

Planning Committee – 19 December 2011 Addendum (1 & 2)

The Addendum details amendments made to the agenda reports since their publication. It may include corrections to the report, additional information (such as extra informatives and conditions) and late correspondence received in relation to the agenda items.

1st Addendum (published 16 December 2011)

11/1443/FUL - TWICKENHAM RAILWAY STATION, LONDON ROAD, TWICKENHAM

Revised conditions:

Condition DV29C to be replaced with DV29E.

Condition NS01 to include existing drawing numbers:

- SRG-TWICKENHAM-TRACK.1 C, SRG-TWICKENHAM-TRACKS.2 received on 26 September 2011.
- SRG.TWICKENHAM-QUEUING.3 C and SRG.TWICKENHAM-QUEUING.4 A received on 26 September 2011.
- SOLUM.TWICKENHAM-QUEUING.1 D received on 3 November 2011.

Condition NS02 - Fixed louvres to be revised as follows:

The fixed louvres shown on 4674/T(20)P01 Rev C, 4674/T(20)P02 Rev C, 4674/T(20)P03 Rev C, 4674/T(20)P04 Rev C, 4674/T(20)P05 Rev D, 4674/T(20)P06 Rev C to Block A and B shall be installed prior to occupation and thereafter retained. REASON – To ensure that the privacy of units within the development and the rooms to the adjacent hotel are protected.

Condition: fixed louvers to be thereafter retained

Condition NS20 to be revised as follows: NS20 – Delivery, Site Waste Management and Servicing Plan:

Prior to the occupation/use of the development hereby approved, a delivery, site waste management and servicing strategy for the site on event days and non-event days shall be submitted to and agreed in writing by the Local Planning Authority. The scheme approved by the local planning authority shall be implemented at all times in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure a safe and convenient form of development with limited impact on local roads and to safeguard the amenities of nearby occupiers and the area generally to include Site Waste Management.

New conditions:

NS81 - No gates shall be erected to the commuter car park at any time. REASON: To ensure that access is not restricted to the underpass.

NS82 - No alterations to the underpass shall take place unless otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure that any alterations do not prejudice pedestrian access.

NS83 - The access into the station on event days shall accord with the details set out on drawings SRG.TWICKENHAM-QUEUING.3 C, SRG.TWICKENHAM-QUEUING.4 A and

SOLUM.TWICKENHAM-QUEUING.1 D unless otherwise agreed in writing with the submission of details by the Local Planning Authority. Temporary barriers shall be provided to prevent event day crowds from accessing the doorstep playspace to the north of block C as identified in the play strategy drawing.

REASON: To ensure the effective management of crowds on event days.

NS84 – Prior to the occupation of the residential properties of phase 2 (with the exception of Block C), that at least 20% of the parking bays shown on drawing no. T(20)P-1 E shall have been equipped with electric charging points. REASON: To comply with the London Plan Policy 6.13.

NS85 – Prior to the commencement of development of Phase 2, details of the wind mitigation measures shall be submitted to and approved in writing by the Local Planning Authority and thereafter implemented and retained in accordance with the agreed details.

REASON: To reduce the impact of wind on the plaza.

NS86 – Prior to the commencement of phase 2, details of the vibration dampening within the building shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure the flats hereby approved provide a suitable standard of accommodation for future occupants.

REASON: To ensure suitable levels of light into the bedroom of this unit.

NS87 – Prior to the occupation of unit CLG-11 in Block C, details of windows to the southern elevation of the said unit shall be submitted to and approved in writing by the Local Planning Authority and thereafter implemented.

Page 26 - additional amendments

- Revised drawings received showing the servicing and swept path analysis and revised ingress of passengers into the station on event days including residential access.
- 2. Unit B00-03 (Bridge Level) where Block B meets Block C has been altered from a three bedroom flat to a two bedroom flat.

A Noise Modelling of Twickenham Station and Vicinity Pre and Post Redevelopment Scenario Modelling received. This has been reviewed by the Council's Environmental Health Department who set out that:

The model has used one of the Council's preferred packages.

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- The model outputs indicate that the development will not have an adverse impact on the acoustic environment of existing residential dwellings and in some cases will reduce received noise levels from transportation noise.
- The predicted facade levels for the proposed development fall within NEC categories A&B.
- Mechanical services noise has not been included, this will be controlled via a noise condition which will limit any future noise to what is effectively a max increase in background level of +1dB(A). This will be imperceptible.

The Council's Environmental Health Department note that the model is representative of the pre and post development situations.

Late letters received

Twickenham Residents Action Group (TRAG) have submitted an alternative proposal for the site that should be considered as part of TRAG's ongoing objection to the Solum application. It is alleged that this presents a policy compliant, viable alternative to the formal planning proposal. TRAG's position remains that the consideration of an alternative design should be done by the applicant (whether or not there is an alternative scheme prepared by the community) and until it has been, no weight can be afforded to the viability argument that has been advanced by Solum.

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- River Crane walkway

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1. Windsor Lines Passenger Association have submitted the following comments:

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- · the entire redesign of the station
- modern replacements for the footbridges, stairs and platform architecture
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2. The Teddington Society

Concern about the adequacy of investment levels for the station and supports the Windsor Lines Passenger Association's polices with regard to the station, these being:

- A 4th track and reinstated linked platform
- · Opening up of the underpass
- · A review of the future use of the old station site
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- A replacement for the failed Crossrail plans for a Norbiton to Stratford service
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The approval of a single development on one side of the tracks limits the scope of station improvements and developments on the other side of the road. No reason why the underpass cannot be used during major events.

Residents:

1 letter of support received stating that it is a better plan. It is not clear if this is in reference to TRAG's plans or not.

1 Late letter received concerned that no mention of bats or requirement for a survey is set out in the report or mention of mitigation required given that there have been recordings of bats in the area.

5 other objections reiterating that already stated in the committee report.

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Page 41 paragraph 7 remove sentence 'Describe nature conservation areas'

Page 46 paragraph 8, last sentence delete 'which has shown'.

Page 47 delete paragraph 7 entirely i.e. 'local objections...platform above them'

Page 48 paragraph 2 revised as follows:

Investment by Network Rail into other station improvements (platforms, canopies, signage, legibility etc) at the station are also triggered by this development's legal agreement, this investment would be £1.4m with a further amount potentially secured by the Council through the Outer London Bid process of £1.5m allowing for the construction of a new footbridge and other improvements to the canopies and Cole Park Road-Beauchamp Road pedestrian footbridge.

Page 55, to the end of the Borough's Heritage Assets section include the following:

Policy DM HD7 seeks to protect the quality of views indicated on the Proposals Map and in addition to the view from Richmond Hill, the view from King Henry's Mound is also protected. With regard to this view in Richmond Park, the proposed building would be visible from this vantage point however part of it (particularly the taller element of Block B and Block A) would be screened by Regal House and the recently erected hotel. Whilst there is a predominant view over the green areas of Petersham Park and the river Thames, the foreground is scattered with views of built form with more distant views of Regal House, the lvy Bridge Estate and Twickenham Stadium. As the building would not break the horizon and skyline it is not considered to detract from this view.

Page 61, additional paragraph to section on Outlook:

With regard to the pedestrian and cyclist environment of Mary's Terrace and the outlook from the recently erected hotel it should be noted that the visual massing of the southern elevation of Block B is broken by the inset of a wedge from the 1st to the 4th floor of the building with the 5th and 6th floors to the east of the block chamfered away from Mary's Terrace. The use of a mixed palette of materials separating the elevation into different elements and the softening sections where a green wall is proposed would limit the impact of the development on the outlook from the north facing hotel bedroom windows and avoids a monotonous slab of development along this highway which would otherwise create a canyon effect with the hotel development.

Page 62, paragraph 8, delete '...is intended for building designers and their clients, consultants and planning officials'

Page 66, paragraph 7 to insert after 'include' the streets Cole Park Road, Station Road, March Road, Arragon Road, London Road, Whitton Road, Mary's Terrace, Queen's Road, Beauchamp Road, Amyand Park Road, Cheltenham Avenue and Grosvenor Road.

Page 66 paragraph 8 to be revised as follows:

Having taken into account the stress on the bays within the surveyed roads (as opposed to including single yellow lines) the average parking stress on the Thursday and Friday surveys was 75% and 74% respectively. It is clear from the surveys that many of these roads already experience a parking stress (above 90% capacity) and these are Arragon Road, Station Road, Beauchamp Road and Amyand Park Road. These levels are not considered untypical given their siting in or bordering a town centre location. It is considered that the road where a perception of parking stress is most likely to be caused by the development and felt by residents would be on Cole Park Road and within its CPZ where parking stress is relatively low at 20-30% and given the number of available bays on this surveyed section of the road (119) an unacceptable parking stress of 90% would only come about with an overspill of approximately 80-85 vehicles from the development.

Page 67 - delete paragraph 4

Page 70 paragraph 4 and page 73 paragraph 10 correct the child yield breakdown to 19, 20 and 15 for ages 0-5 (nursery), ages 5-11 (primary) and ages 12 and above (secondary school) respectively.

Page 71after paragraph 5 insert the following:

'Given that the site is located on top off and adjacent to a train station, private and semi private amenity space is restricted. As such and in line with policy DM DC6 and the London Plan, each flat would have access to either a private/semi private balcony, terrace or in the case of those units fronting the station winter gardens, with a few exceptions. Six units on the ground floor of Block A and B would have modest gardens and the lower duplexes in Block C would have modest front gardens which would lead onto 'doorstep' play areas, the play areas adjacent to the platform footbridge and access road and the riverside walk beyond.

The Council's SPD: Residential Development Standards requires that a minimum of 5sqm of private outdoor amenity space should be provided per 1-2 person dwellings and the winter gardens, terraces, balconies and gardens comply with this.'

Page 71, paragraph 2. Insert at the end 'Members should note that an area of the play space is within permanent shadow being sited to the immediate north of Block C.

Page 81 – delete '(- and the limited area to the east of the site where the river bank is particularly close to the access road and London Road Bridge)' from paragraph 4.

Page 84 test points referred to in paragraph 8-10 are from the following areas:

Test point 7: At road junction of Arragon Road and London Road looking Northwest at drivers eye level

Test point 8: At road junction of Whitton Road and London Road looking Southeast at drivers eye level.

Test point 14: On proposed Regal Hotel development north elevation, fourth floor looking northwest.

Page 87, paragraph 4 to be revised as follows:

The impact of buildings on television and radio reception is a material planning consideration however there are no specific planning polices to safeguard the quality of television signals.

Page 95 paragraph 6 replace sentence '-has John agreed this' to 'The council's environmental health section have agreed with this assessment.'

Page 95 paragraph 7 replace reference to condition DV19C with DV29E.

Page 99, replace paragraph 5 with the following:

'In conclusion, it is considered that the pre-application consultation that has taken place on the current application is satisfactory however the consultation process on the revised scheme submitted would have benefitted from a further series of public exhibitions and a full summary of the findings to the responses to the July 2011 newsletter. In particular, Members should note that support for a new station and improved facilities, as with the RFU petition is not accepted by officers to be a direct translation of support for the submitted scheme. It is hence concluded that dialogue with the community could have been improved and the findings have not been reported or influenced the final design.'

Other information

Members will be aware that the Twickenham Advisory Panel have reported their findings of the application to the Leader of the Council (Lord True) on the back of the public event held in July 2011.

This response has not been submitted against the planning application or formally to planning officers and as such the comments therein are not considered material in the consideration of this application.

Affordable Housing Summary

This application is a renegotiated scheme for a 115 units. These units are all private sale and represents a reduction of 50 units (28 affordable and 22 private sale) compared to the larger, 165 unit scheme (proposed previously under 10/3465/FUL). which allowed for the height and massing of the current development to be reduced and pressure on parking and surrounding infrastructure to be reduced.

The proposal for no affordable housing on -site does not fulfil policy requirements set out in Proposal Site T17 and Policy CP15. There is an unarguable need for affordable housing in the borough and this is recognised in the evidence set out in the Environment Statement. The lack of any provision of affordable housing creates an adverse impact that needs to be quantified - as within a borough where land supply is limited the opportunity to meet local housing need is lost.

As part of the planning application, a comprehensive financial assessment has been submitted by the applicants, and verified through an independent assessment by the Council's consultants, which demonstrates that no affordable housing can be delivered by this scheme, to meet the requirements of Policies CP15 and DM HO6. This is partly due to the expectation of abnormal constructions costs in connection with the raft, the Council's assessor having confirmed that the developer's profit is in

line with current market expectations for a development of this type. Clearly, the scheme's viability renders it deliverable but with only a limited financial contribution towards Planning Obligations, this would be eroded should market unit prices not be achieved throughout the development because of the provision of affordable housing. Therefore the Council's valuer concludes that the development cannot support any affordable housing. Colleagues in Housing Policy (Corporate Partnership and Policy) advise that because no affordable housing is proposed for the site, accordingly no public subsidy has been able to be allocated for on-site provision.

Nonetheless, financial contributions for off-site provision are safeguarded by an overage clause in the legal agreement. This takes the form of a 2-part appraisal process. The first stage comprises an audit of build costs linked to the raft on its completion and should savings have been achieved below the £4m figure contained in the EAT, these monies shall be dedicated towards POS contributions of £300,000 and then affordable housing. The 2nd stage will comprise a conventional appraisal of the main development's actual costs and sale prices achieved for the first 50 units. A further financial contribution towards off-site affordable housing may again be secured at this stage.

In conclusion, this application is for the redevelopment of a unique site and facilitates the creation of a new station, platform improvement works, a new plaza, river walk and other riverside enhancements which offer a very significant community benefit as part of the Twickenham town centre's regeneration. It will be for Councillors to consider if these deliverable planning benefits in a time of economic uncertainty, and the potential financial contribution towards an off-site affordable housing provision secured by the legal agreement, are sufficient to outweigh the need for affordable housing provision on-site.

2nd Addendum (published 19 December 2011)

11/1443/FUL - TWICKENHAM RAILWAY STATION, LONDON ROAD, TWICKENHAM

Additional conditions

NS88 – Prior to the commencement of phase 2, details of the controlled ventilation and filtration system shall be submitted and approved by the Local Planning Authority and implemented in accordance with such details thereafter. REASON: To ensure the flats hereby approved provide a suitable standard of accommodation for future occupants.

NS89 - Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking or re-enacting that Order) no telecommunications equipment shall be carried out to the building(s) hereby approved.

REASON: To safeguard the amenities of the occupiers of adjoining property and the area generally.

Residents

1 additional letter re-iterating the objections already reported.

Twickenham Residents Action Group have submitted the following:

- 36 signatures on the standard letter objecting to the oppressive wall, poor quality design, cost of the station and raft and contrary to the Council's SPD.
- 186 signatures on support cards for TRAG's plan B proposals
- 6 e-mail responses (submitted by TRAG) supporting the TRAG proposal and objecting to the Solum proposal.

A petition with 454 signatures received stating that the following will be supported on the Twickenham Station and Post Office Site:

- 1. Well planned, appropriate, low rise station development.
- 2. A mixture of uses on these sites.
- 3. The Council's SPG where a maximum of 5 storeys will be permitted.

And the following objected to:

- 1. High rise tower blocks.
- 2. No additional school places provided.
- 3. No on site car parking
- 4. Twickenham becoming the next Croydon

One late letter from Friends of the River Crane (FORCE) stating the following:

- Accept that no river naturalisation is possible on site and welcome the proposed S106 funding of environmental improvements upstream of the river.
- They also note that potential still remains for on-site naturalisation at some time in the future.
- Concerns that the conditions related to the land adjacent to the river do not specifically require the developer to apply them to the whole of the open area within the application site and that the conditions be amended to specify this.
- Japanese knotweed should be dealt with in the owners entire area of ownership.
- Welcome the riverside walk although not supportive of this being locked overnight and possible loss of this route to Moormead Park in the future.
- Request that FORCE are involved with the council in the development and implementation of maintenance and management plans for the riverside walk area.

One later letter received from Mr Mellor setting out the following:

- The physical capacity of the new station has decreased insofar as the new plaza has a very similar area to the existing one when taking into account crowd measures on event days, the decrease in platform lengths given the reduction in transitional space leading to the stair and lift access (80sqm), an increase of only 40sqm for the ticket office and decrease of over 75sqm beyond the gates. There is no public or disabled WC located off of the ticket hall (a requirement of Network Rail's Guide to station planning & design) or direct access off of the ticket hall to an information desk, waiting areas or retail facilities.
- The use of the underpass would result in the loss of 19 car parking spaces and cycle spaces, the latter undermining SWT car parking requirement.

- Design aspects of the ticket hall will suffer in peak times such as the conflict
 of queues with circulation areas, conflict with the bus stop's location between
 residents, visitors and bus passengers. Access to the residential cores of
 matchdays will not be possible and the access to Block C impossible for
 those impaired movement. The physical area for matchday holding has been
 reduced with the access corridor narrower than that of the underpass.
 Access for emergency vehicles on match day into the car park access will be
 near impossible with the area used as a holding area.
- Objections from CABE on the previous scheme cited in particular the confusion of public and private space and lack of prominence of the station entrance.
- TRAG's plan B proposal would remain primarily a station and the other functions would compliment it.

One later letter from Mr Milner stating the following:

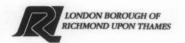
- The widening of Mary's Terrace with Beauchamp Road may no longer be possible as a result of the installation of signalling equipment in the area.
- If widened the area by the garages will also require widening to allow turning.
- Mr Milner suggest permanent widening of the road with a cycle lane, new boundary wall and soft landscaping incorporated.
- Objection to a closure of Mary's Terrace for 33 months and use as a construction yard.
- Unacceptable noise and disturbance on weekends and evenings and token
 efforts during work at the station recently making little difference when
 implemented. Proposal to form a group with the council, resident group and
 councillor to assess working hours' proposals, these be communicated in
 advance, council officers on call for monitoring, no consecutive weekend work
 or during holidays weekends and Solum to provide funds for residents to have
 sound insulation, double glazing etc.
- Alternative parking spaces required for residents with CPZ permits such as rental of Mary's Terrace garages, widening of the road for parking and/or increase in parking in Beauchamp Road.
- Concern regarding 12 months of construction due to the Travel lodge and work already at the station and consideration from officers during the proposed build out period.
- Objections from application 10/1972 also submitted for reference.

Alterations to the officer's report:

Page 5, paragraph 10 to refer to 2035 and not 2025.

Parge12, paragraph 1, replace '3 residents disabled spaces' with '7 residents disabled spaces' and replace '35 commuter' with '27 (which includes 3 disabled spaces and 3 electric charging point spaces).

Page 96 paragraph 6 remove '(EA view?)'



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Page 48 paragraph 2 revised as follows:

Investment by Network Rail into other station improvements (platforms, canopies, signage, legibility etc) at the station are also triggered by this development's legal agreement, this investment would be £1.4m with a further amount potentially secured by the Council through the Outer London Bid process of £1.5m allowing for the construction of a new footbridge and other improvements to the canopies and Cole Park Road-Beauchamp Road pedestrian footbridge.

Page 55, to the end of the Borough's Heritage Assets section include the following:

Policy DM HD7 seeks to protect the quality of views indicated on the Proposals Map and in addition to the view from Richmond Hill, the view from King Henry's Mound is also protected. With regard to this view in Richmond Park, the proposed building would be visible from this vantage point however part of it (particularly the taller element of Block B and Block A) would be screened by Regal House and the recently erected hotel. Whilst there is a predominant view over the green areas of Petersham Park and the river Thames, the foreground is scattered with views of built form with more distant views of Regal House, the lvy Bridge Estate and Twickenham Stadium. As the building would not break the horizon and skyline it is not considered to detract from this view.

Page 61, additional paragraph to section on Outlook:

With regard to the pedestrian and cyclist environment of Mary's Terrace and the outlook from the recently erected hotel it should be noted that the visual massing of the southern elevation of Block B is broken by the inset of a wedge from the 1st to the 4th floor of the building with the 5th and 6th floors to the east of the block chamfered away from Mary's Terrace. The use of a mixed palette of materials separating the elevation into different elements and the softening sections where a green wall is proposed would limit the impact of the development on the outlook from the north facing hotel bedroom windows and avoids a monotonous slab of development along this highway which would otherwise create a canyon effect with the hotel development.

Page 62, paragraph 8, delete '...is intended for building designers and their clients, consultants and planning officials'

Page 66, paragraph 7 to insert after 'include' the streets Cole Park Road, Station Road, March Road, Arragon Road, London Road, Whitton Road, Mary's Terrace, Queen's Road, Beauchamp Road, Amyand Park Road, Cheltenham Avenue and Grosvenor Road.

Page 66 paragraph 8 to be revised as follows:

Having taken into account the stress on the bays within the surveyed roads (as opposed to including single yellow lines) the average parking stress on the Thursday and Friday surveys was 75% and 74% respectively. It is clear from the surveys that many of these roads already experience a parking stress (above 90% capacity) and these are Arragon Road, Station Road, Beauchamp Road and Amyand Park Road. These levels are not considered untypical given their siting in or bordering a town centre location. It is considered that the road where a perception of parking stress is most likely to be caused by the development and felt by residents would be on Cole Park Road and within its CPZ where parking stress is relatively low at 20-30% and given the number of available bays on this surveyed section of the road (119) an unacceptable parking stress of 90% would only come about with an overspill of approximately 80-85 vehicles from the development.

Page 67 - delete paragraph 4

Page 70 paragraph 4 and page 73 paragraph 10 correct the child yield breakdown to 19, 20 and 15 for ages 0-5 (nursery), ages 5-11 (primary) and ages 12 and above (secondary school) respectively.

Page 71after paragraph 5 insert the following:

'Given that the site is located on top off and adjacent to a train station, private and semi private amenity space is restricted. As such and in line with policy DM DC6 and the London Plan, each flat would have access to either a private/semi private balcony, terrace or in the case of those units fronting the station winter gardens, with a few exceptions. Six units on the ground floor of Block A and B would have modest gardens and the lower duplexes in Block C would have modest front gardens which would lead onto 'doorstep' play areas, the play areas adjacent to the platform footbridge and access road and the riverside walk beyond.

The Council's SPD: Residential Development Standards requires that a minimum of 5sqm of private outdoor amenity space should be provided per 1-2 person dwellings and the winter gardens, terraces, balconies and gardens comply with this.'

Page 71, paragraph 2. Insert at the end 'Members should note that an area of the play space is within permanent shadow being sited to the immediate north of Block C.

Page 81 – delete '(- and the limited area to the east of the site where the river bank is particularly close to the access road and London Road Bridge)' from paragraph 4.

Page 84 test points referred to in paragraph 8-10 are from the following areas:

Test point 7: At road junction of Arragon Road and London Road looking Northwest at drivers eye level

Test point 8: At road junction of Whitton Road and London Road looking Southeast at drivers eye level.

Test point 14: On proposed Regal Hotel development north elevation, fourth floor looking northwest.

Page 87, paragraph 4 to be revised as follows:

The impact of buildings on television and radio reception is a material planning consideration however there are no specific planning polices to safeguard the quality of television signals.

Page 95 paragraph 6 replace sentence '-has John agreed this' to 'The council's environmental health section have agreed with this assessment.'

Page 95 paragraph 7 replace reference to condition DV19C with DV29E.

Page 99, replace paragraph 5 with the following:

'In conclusion, it is considered that the pre-application consultation that has taken place on the current application is satisfactory however the consultation process on the revised scheme submitted would have benefitted from a further series of public exhibitions and a full summary of the findings to the responses to the July 2011 newsletter. In particular, Members should note that support for a new station and improved facilities, as with the RFU petition is not accepted by officers to be a direct translation of support for the submitted scheme. It is hence concluded that dialogue with the community could have been improved and the findings have not been reported or influenced the final design.'

Other information

Members will be aware that the Twickenham Advisory Panel have reported their findings of the application to the Leader of the Council (Lord True) on the back of the public event held in July 2011.

This response has not been submitted against the planning application or formally to planning officers and as such the comments therein are not considered material in the consideration of this application.

Affordable Housing Summary

This application is a renegotiated scheme for a 115 units. These units are all private sale and represents a reduction of 50 units (28 affordable and 22 private sale) compared to the larger, 165 unit scheme (proposed previously under 10/3465/FUL). which allowed for the height and massing of the current development to be reduced and pressure on parking and surrounding infrastructure to be reduced.

The proposal for no affordable housing on -site does not fulfil policy requirements set out in Proposal Site T17 and Policy CP15. There is an unarguable need for affordable housing in the borough and this is recognised in the evidence set out in the Environment Statement. The lack of any provision of affordable housing creates an adverse impact that needs to be quantified - as within a borough where land supply is limited the opportunity to meet local housing need is lost.

As part of the planning application, a comprehensive financial assessment has been submitted by the applicants, and verified through an independent assessment by the Council's consultants, which demonstrates that no affordable housing can be delivered by this scheme, to meet the requirements of Policies CP15 and DM HO6. This is partly due to the expectation of abnormal constructions costs in connection with the raft, the Council's assessor having confirmed that the developer's profit is in

line with current market expectations for a development of this type. Clearly, the scheme's viability renders it deliverable but with only a limited financial contribution towards Planning Obligations, this would be eroded should market unit prices not be achieved throughout the development because of the provision of affordable housing. Therefore the Council's valuer concludes that the development cannot support any affordable housing. Colleagues in Housing Policy (Corporate Partnership and Policy) advise that because no affordable housing is proposed for the site, accordingly no public subsidy has been able to be allocated for on-site provision.

Nonetheless, financial contributions for off-site provision are safeguarded by an overage clause in the legal agreement. This takes the form of a 2-part appraisal process. The first stage comprises an audit of build costs linked to the raft on its completion and should savings have been achieved below the £4m figure contained in the EAT, these monies shall be dedicated towards POS contributions of £300,000 and then affordable housing. The 2nd stage will comprise a conventional appraisal of the main development's actual costs and sale prices achieved for the first 50 units. A further financial contribution towards off-site affordable housing may again be secured at this stage.

In conclusion, this application is for the redevelopment of a unique site and facilitates the creation of a new station, platform improvement works, a new plaza, river walk and other riverside enhancements which offer a very significant community benefit as part of the Twickenham town centre's regeneration. It will be for Councillors to consider if these deliverable planning benefits in a time of economic uncertainty, and the potential financial contribution towards an off-site affordable housing provision secured by the legal agreement, are sufficient to outweigh the need for affordable housing provision on-site.

2nd Addendum (published 19 December 2011)

11/1443/FUL - TWICKENHAM RAILWAY STATION, LONDON ROAD, TWICKENHAM

Additional conditions

NS88 – Prior to the commencement of phase 2, details of the controlled ventilation and filtration system shall be submitted and approved by the Local Planning Authority and implemented in accordance with such details thereafter. REASON: To ensure the flats hereby approved provide a suitable standard of accommodation for future occupants.

NS89 - Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking or re-enacting that Order) no telecommunications equipment shall be carried out to the building(s) hereby approved.

REASON: To safeguard the amenities of the occupiers of adjoining property and the area generally.

Residents

1 additional letter re-iterating the objections already reported.

Twickenham Residents Action Group have submitted the following:

- 36 signatures on the standard letter objecting to the oppressive wall, poor quality design, cost of the station and raft and contrary to the Council's SPD.
- 186 signatures on support cards for TRAG's plan B proposals
- 6 e-mail responses (submitted by TRAG) supporting the TRAG proposal and objecting to the Solum proposal.

A petition with 454 signatures received stating that the following will be supported on the Twickenham Station and Post Office Site:

- 1. Well planned, appropriate, low rise station development.
- 2. A mixture of uses on these sites.
- 3. The Council's SPG where a maximum of 5 storeys will be permitted.

And the following objected to:

- 1. High rise tower blocks.
- 2. No additional school places provided.
- 3. No on site car parking
- 4. Twickenham becoming the next Croydon

One late letter from Friends of the River Crane (FORCE) stating the following:

- Accept that no river naturalisation is possible on site and welcome the proposed S106 funding of environmental improvements upstream of the river.
- They also note that potential still remains for on-site naturalisation at some time in the future.
- Concerns that the conditions related to the land adjacent to the river do not specifically require the developer to apply them to the whole of the open area within the application site and that the conditions be amended to specify this.
- Japanese knotweed should be dealt with in the owners entire area of ownership.
- Welcome the riverside walk although not supportive of this being locked overnight and possible loss of this route to Moormead Park in the future.
- Request that FORCE are involved with the council in the development and implementation of maintenance and management plans for the riverside walk area.

One later letter received from Mr Mellor setting out the following:

- The physical capacity of the new station has decreased insofar as the new plaza has a very similar area to the existing one when taking into account crowd measures on event days, the decrease in platform lengths given the reduction in transitional space leading to the stair and lift access (80sqm), an increase of only 40sqm for the ticket office and decrease of over 75sqm beyond the gates. There is no public or disabled WC located off of the ticket hall (a requirement of Network Rail's Guide to station planning & design) or direct access off of the ticket hall to an information desk, waiting areas or retail facilities.
- The use of the underpass would result in the loss of 19 car parking spaces and cycle spaces, the latter undermining SWT car parking requirement.

- Design aspects of the ticket hall will suffer in peak times such as the conflict
 of queues with circulation areas, conflict with the bus stop's location between
 residents, visitors and bus passengers. Access to the residential cores of
 matchdays will not be possible and the access to Block C impossible for
 those impaired movement. The physical area for matchday holding has been
 reduced with the access corridor narrower than that of the underpass.
 Access for emergency vehicles on match day into the car park access will be
 near impossible with the area used as a holding area.
- Objections from CABE on the previous scheme cited in particular the confusion of public and private space and lack of prominence of the station entrance.
- TRAG's plan B proposal would remain primarily a station and the other functions would compliment it.

One later letter from Mr Milner stating the following:

- The widening of Mary's Terrace with Beauchamp Road may no longer be possible as a result of the installation of signalling equipment in the area.
- If widened the area by the garages will also require widening to allow turning.
- Mr Milner suggest permanent widening of the road with a cycle lane, new boundary wall and soft landscaping incorporated.
- Objection to a closure of Mary's Terrace for 33 months and use as a construction yard.
- Unacceptable noise and disturbance on weekends and evenings and token
 efforts during work at the station recently making little difference when
 implemented. Proposal to form a group with the council, resident group and
 councillor to assess working hours' proposals, these be communicated in
 advance, council officers on call for monitoring, no consecutive weekend work
 or during holidays weekends and Solum to provide funds for residents to have
 sound insulation, double glazing etc.
- Alternative parking spaces required for residents with CPZ permits such as rental of Mary's Terrace garages, widening of the road for parking and/or increase in parking in Beauchamp Road.
- Concern regarding 12 months of construction due to the Travel lodge and work already at the station and consideration from officers during the proposed build out period.
- Objections from application 10/1972 also submitted for reference.

Alterations to the officer's report:

Page 5, paragraph 10 to refer to 2035 and not 2025.

Parge12, paragraph 1, replace '3 residents disabled spaces' with '7 residents disabled spaces' and replace '35 commuter' with '27 (which includes 3 disabled spaces and 3 electric charging point spaces).

Page 96 paragraph 6 remove '(EA view?)'