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17 October 2011

Twickenham Railway Station

in the London Borough of Richmond upon Thames

planning application no. 11/1443/FUL

Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

Redevelopment of the station to provide a new station concourse with lifts and stairs to platform level and a new ticket hall with a podium across existing railway lines.

Three buildings of up to seven storeys, comprising 115 flats, units for retail, financial services, cafe/restaurant and/or leisure uses, a new station plaza and new riverside walkway.

The applicant

The applicant is **Solum Regeneration**, and the architect is **Rolfe Judd**.

Strategic issues

The proposal is a mixed-use but predominantly residential scheme, that would deliver an **upgraded railway station** in time for the 2015 Rugby World Cup. The **principle and density** of the development is appropriate, although the scheme would provide **no affordable housing**, in favour of the station improvements. The **design**, level of **play space** and **access** is appropriate for a town centre and station context. Matters of **ambient noise**, and **transport and parking**, and **climate change** are generally compliant with the London Plan, although some further information is required regarding the energy strategy.

Recommendation

That Richmond upon Thames Council be advised that while the application is generally acceptable in strategic planning terms, the application does not comply with the London Plan, for the reasons set out in paragraph 107 of this report; but that the possible remedies set out in paragraph 109 of this report could address these deficiencies.

Context

1 On 13 September 2011, the Mayor of London received documents from Richmond upon Thames Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 27 October 2011 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan,

and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 2C of the Schedule to the Order 2008: *"Development to provide ... (d) a railway station or tram station."*

3 Once Richmond upon Thames Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The site is located on the eastern side of London Road, above and to the north of the railway lines at the station. Its position is elevated, being on the apex of the bridge that rises to carry London Road over the lines. The site marks the effective northern end of Twickenham's high street but stands as a major station in its own right. Existing low-rise residential development faces the site's northern boundary, across the River Crane. To the south, the station abuts Regal House, a ten-storey building, which was recently the subject of planning permission for remodelling and extension, with change of use to a hotel, although this has not yet been implemented.

7 Twickenham Station is managed by South West Trains and provides services to Clapham Junction and Central London as well as to Windsor and Reading. The station fronts onto (A310) London Road which links to (A316) Chertsey Road approximately 500m to the north. The A316 is part of the Transport for London road network (TLRN) while (A305) King Street to the south is part of the strategic road network (SRN).

8 Bus routes 267 and 281 operate along London Road and provide direct interchange with the station. An additional five bus services are available within 500 metres of the site. The combination of bus and rail services result in a public transport accessibility level (PTAL) of 5 for this site, on a scale of 1 to 6 where 6 is most accessible.

9 The site comprises the land currently occupied by the station office and facilities of Twickenham Railway Station, the plaza in front of the station, together with the land between the station and the River Crane. It is approximately one kilometre south of Twickenham Stadium, which is a site for major sporting and non-sport events. Twickenham Station is the main station serving the stadium, and is subject to over-crowding on match days. The stadium will be one of three London venues supporting England's hosting of the 2015 Rugby World Cup, and will host the final match.

Details of the proposal

10 The development will provide a predominantly residential-led scheme that will also include the demolition and redevelopment of the existing station.

11 The station redevelopment component will include a new ticket hall at podium level with direct stair and lift access down to the platforms.

12 At podium/bridge level, the new ticket hall would be accessed via a public plaza abutting London Road. Six retail/commercial/leisure units of various sizes would abut the station entrance and face London Road, providing a new active frontage over the bridge to the north of the station entrance. To the north, the plaza provides access to private residential entrances and a stairway down to the level of the River Crane.

13 At river level, development underneath the podium and adjacent to the river would include a 41-bay car park (35 bays would replace the existing station car park) and a landscaped walk along the southern bank of the River Crane, leading to entrances to new multilevel flats with small private front gardens. Other facilities at this level would include a taxi area and a drop-off area.

14 At podium level and above, residential accommodation would be located in three buildings. Block A would be built parallel with London Road and rise up to five storeys above podium level. Block B would rise above the railway station ticket office, six storeys above podium level. Block C would contain duplex flats and be built at river level, with three storeys above.

15 The design is intended to enable match-day crowd movements serving Twickenham Stadium, with flows separated between podium/bridge level access via the ticket office, and direct platform access via the car park access at river/platform level.

16 The applicant, Solum Regeneration, is a joint venture between Network Rail and Kier Property.

Case history

17 A pre-application meeting was held on 28 April 2010, attended by the applicant, Richmond upon Thames Council officers, and GLA officers. A follow-up meeting was held at City Hall on 11 August 2010.

18 In 2010, Richmond upon Thames Council approved plans for extension of the station platforms. A separate application for the construction of the podium over the station with access from the existing station building is currently being considered by the Council, but is not referable to the Mayor.

19 On 17 March 2011, the Mayor considered a report (PDU)/2619/01), and provided comments to Richmond-upon Thames Council, on an earlier iteration of the current scheme. As well as the station elements proposed by the current scheme, the proposal was for a similarly mixed-use scheme, including three buildings of between three and eight storeys, comprising 165 flats. This application has not yet been determined by the Council. On determination, it will be referred back to the Mayor for his decision.

Strategic planning issues and relevant policies and guidance

20 The relevant issues and corresponding policies are as follows:

- World city role *London Plan*
- Mix of uses *London Plan*
- Housing *London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft*
- Affordable housing *London Plan; PPS3; Housing SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft*

- Density *London Plan; PPS3; Housing SPG; Interim Housing SPG; Housing SPG EiP draft*
- Tall buildings / views *London Plan; RPG3A, Revised View Management Framework SPG*
- Urban design *London Plan; PPS1*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13; Land for Transport Functions SPG*
- Parking *London Plan; the Mayor's Transport Strategy; PPG13*
- Climate change *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*
- Ambient noise *London Plan; the Mayor's Ambient Noise Strategy; PPG24*
- Blue Ribbon / Flood risk *London Plan; Mayor's draft Water Strategy; PPS25, RPG3B*

21 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2009 Richmond upon Thames Core Strategy, and the saved policies of the 2005 Richmond upon Thames Unitary Development Plan, and the London Plan (Consolidated with Alterations since 2004).

22 The Richmond upon Thames Development Management DPD, which is expected to be adopted by the Council on 1 November 2011, is also a material consideration.

World city role / mix of uses

23 The station improvement is strongly welcomed given the forthcoming (2015) Rugby World Cup, which will utilise Twickenham Stadium. The Rugby Football Union (RFU) considers that a station upgrade is imperative. The Rugby World Cup is the world's third-largest sporting event and is expected to attract three million visitors to the UK, and the experience of passengers using the station should therefore be world-class.

24 The proposed mix of uses is appropriate given that the development is located above the station in the town centre. The development is residential-led, which will provide a viable financial case for the station redevelopment, while the non-residential uses are limited to uses allied to the station environment, and the continuation of the town centre frontage over the railway bridge. The delivery of a new public square in front of the station entrance is supported.

Housing /affordable housing

25 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so, each council should have regard to current and future requirements for affordable housing at local and regional levels, its own overall target for affordable housing provision, and the need to encourage rather than restrain residential development. Policy 3.11 states that borough targets should take account of matters including current and future housing requirements, the strategic targets and priority accorded to affordable family housing, the need to promote mixed and balance communities, and the viability of future development, and that within those targets 60% of affordable housing should be for social rent, and 40% for intermediate rent or sale.

26 The Council's adopted Core Strategy requires 50% of all new housing development to be affordable. The proposed residential mix is shown in the table below:

	One-bedroom flat	Two-bedroom flat	Three-bedroom flat	Total
Private	37 (32%)	66 (57%)	12 (10%)	115

27 The proposal does not provide affordable housing in any tenure. As such, the proposal neither addresses the Mayoral priority to increase affordable housing within London, nor does it comply with the London Plan.

28 It is noted that the previous proposal commented on by the Mayor provided 17% affordable housing by unit number, which was also considered unacceptable. However, in his comments on that proposal, the Mayor noted that given the context of the proposal, whereby it would deliver improvements to the station and precinct, the proposed housing mix would be appropriate.

29 The current scheme's viability assessment has been independently reviewed by the commercial arm of the Valuation Office Agency. Its report concludes that the development has no financial capacity to provide affordable housing or other section 106 contributions, and that the proposed costs are appropriate. A query is raised regarding the sizes of units, which is discussed in the design section of this report.

30 While the Mayor's priority is for the provision of affordable housing, he recognises the importance of the station to provide an adequate facility to serve the stadium, specifically for the 2015 Rugby World Cup. The earlier proposal, although able to provide both station improvements and affordable housing, is understood to be facing opposition from residents for reasons predominantly related to its scale, and was not supported by the Mayor. The removal of the affordable housing provides an opportunity to reduce the scale of the proposal, but the retention of much of the private housing would provide funding for the station improvements.

31 The provision of infrastructure to support world-class events in London is also a Mayoral priority, and must be balanced against the Mayoral priority of addressing London's shortage of affordable housing. The scheme provides a programme for station improvements to be delivered, to ensure the station's fitness for 2015, at the cost of the affordable housing. Given these competing priorities, on balance, the provision of the upgraded station facilities is considered to be the more important.

Housing mix

32 10% of units would provide family accommodation. In the absence of affordable accommodation, and given the development's town centre location and station context, this mix is acceptable.

Children's play space

33 The London Plan states that the Mayor will and the boroughs 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. Using the methodology within the Mayor's supplementary planning guidance 'Providing for Children and Young People's Play and Informal Recreation' it is anticipated that there will be about 17 children within the

development. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. As such the development should make provision for 170 sq.m. of playspace.

34 This development provides approximately 500sq.m. play space incorporated within the landscape, with provision for under-5s on site, and doorstep play. This would be provided alongside the river with direct access from block C, and access via the podium stairway for the other blocks. The provision of playspace away from the podium area and railway facilities is supported.

Density

35 Residential density is calculated using the net residential site area, removing the non-residential uses. Based on the site area of 0.96ha and 92.5% of the total development floorspace allocated to residential use, the site area for density calculation purposes is 0.88ha. Calculating the site density of 115 dwellings over this area provides a residential density of 130 dwellings per hectare. This is in comparison with the previous scheme seen by the Mayor, which would provide 194 dwellings per hectare.

36 Using the 'urban' category of the London Plan density matrix, the optimal density range for this site is between 70 and 260 dwellings per hectare. The density of the proposed development is within this range, demonstrating that in purely quantitative terms, this quantum of development is appropriate for the site.

Tall buildings / views

37 London Plan (2011) policy 7.7, which relates to the specific design issues associated with tall and large-scale buildings, is of particular relevance to the proposed scheme. This policy sets out specific additional design requirements for tall and large-scale buildings, which are defined as buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline and are larger than the threshold sizes set for the referral of planning applications to the Mayor.

38 The development is likely to be considered as a tall building for strategic assessment purposes, based on the London Plan definition of tall buildings as being "those that are noticeably taller than their surroundings, (or) have a significant impact on the skyline". The Core Strategy defines Twickenham town centre as a suitable location for tall buildings, and it is noted that Regal House, to the immediate south of the site, is taller than the proposed development.

39 The location is not visible from any of the defined view locations as set out within the London View Management Framework.

40 An issue for strategic consideration is the proposed scheme's impact on views from Richmond Hill, which is the only view in England to be specifically protected by an Act of Parliament. The view supplied within the applicant's views assessment demonstrates that the proposal would be lower than Regal House, and while it would be visible in this view, it would appear as part of the townscape. Importantly, it would not break the skyline/horizon line when viewed from the hill. The proposal would have no detrimental impact on the view.

41 Other long-range and local views have been supplied within the townscape and views assessment. These demonstrate that there would be no strategic impact. The Mayor will take the findings of the Council into account when considering its assessment of the local impact. It is noted that the proposal does not comply with the Council's adopted (2010) *Twickenham Station*

and surroundings design standards supplementary planning document, which seeks to limit development to 4-5 storeys in height above the station, and 2-3 storeys in height in the area between the river and station.

Urban design

42 Good design is central to all objectives of the London Plan (2011) and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. *London Plan Policy 7.1 sets out a series of overarching design principles for development in London.* Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage and World Heritage Sites, views, the public realm and the Blue Ribbon Network. New development is also *required to have regard to its context, and make a positive contribution to local character within its neighbourhood (policy 7.4).*

Design principles

43 The site is transitional in many respects; it is located between a district-level town centre to the south, with development that is of a scale relevant to this function, and low-density suburban housing to the north. It is part of the high street, yet also has a quiet river frontage. The architectural quality of the existing station buildings is poor, and the station is clearly not fit for purpose, given its role as the station serving a town centre and nearby major stadium.

44 The general approach to design is supported, and the creation of an improved station entrance and accompanying high quality development welcomed. The scheme will also increase the passenger-handling capacity of the station, especially for London-bound travellers at event times, and extend the town centre across the break in the town centre frontage that is presently created by the bridge.

45 The design allows for the possible future extension of the present terminating bay platform underneath the podium to form a fourth railway running line to the west, underneath London Road.

Massing, scale, layout and appearance

46 The proposed scheme has been reduced in scale compared with the previous scheme, varying in height between one and two storeys. Comparisons are provided in the pictures overleaf. The general style of blocks A and B has been retained, as has the general layout. However the appearance of block C has been revised to incorporate traditional elements, as indicated in figure 3. For the previous scheme, the Mayor commented that its visualisations demonstrated a large scale when viewed from the surrounding predominantly residential streets, and in his letter to the Council, he objected to the scheme's scale. The current scheme reduces the scale and the transitions between scales are lessened.



Figure 1 (above): view of bridge / podium level from London Road, looking north, comparing previous scheme (blue outline) and the present proposal.



Figures 2 (above) and 3 (below): Visualisations of the previous scheme (on left) and the present proposal. Figure 2 shows the ticket hall entrance and public plaza as viewed from the top of London Road bridge; figure 3 shows the river walk and car park access, looking east from London Road. (Source: applicant's "Height and massing comparison to previous application" application document.)



47 The station's double-height entrance area and enlarged plaza, along with a simplification of access between the street and platforms, via the plaza and new ticket hall, is welcomed. The associated plaza improvements will increase visibility of the station from the high street and assist with crowd capacity. Other routes for crowd management are identified within the proposal and appear adequate, with residential areas and entrances away from main routes.

48 The scheme would provide access to the southern bank of the River Crane, in the form of a walk between London Road and a footbridge beyond the site's eastern boundary, linking to future Council aspirations for the link to become part of a longer riverside walk. This area has been incorporated within the scheme's open space offer, with front doors and overlooking onto the space providing *passive surveillance* and assisting safety.

49 The scale of the proposal is appropriate when viewed from the high street. It would be slightly lower in height than the proposed extension to Regal House, which abuts the proposal site to the south, but retain a scale that announces the station's presence and would be clearly visible from the main shopping and commercial area. The effect is more striking when approached from the north, where there is an existing low-rise context, with the new buildings stepping down over the bridge while acting as a gateway for the town centre.

50 The proposed development's appearance would be modern and relevant within the town centre context. Predominant materials would be light and dark coloured brick, metal cladding and glazing. Sufficient variation would be applied across facades to make the buildings appear interesting. Residential entrances would be clear within the context of the buildings' exteriors, and communal entrances would be visible from the public realm, but away from main crowd routes. Dwellings facing the river would have more of a traditional domestic appearance, which is appropriate to the 'stepping down' of the development on its northern side.

Residential quality

51 Policy 3.5 of the London Plan states that housing developments should be of the highest quality internally, externally and in relation to the wider environment. Part C of the policy states that new dwellings should generally conform with the dwelling space standards set out in table 3.3, have adequately sized rooms and convenient and efficient room layouts. Part E of the policy states that the Mayor will provide guidance on implementation of this policy including on housing design for all tenures. The reasoned justification provides further guidance and explanation. In particular, paragraph 3.32 makes clear that "*Securing new housing of the highest quality and protecting and enhancing residential neighbourhoods are key Mayoral priorities*". The Mayor's draft Housing Design Guide (July 2009) and the Interim Housing SPG (EiP version – August 2010), provides further guidance on the implementation of these policies.

52 One of the residential quality issues raised at pre-application stage with this scheme was outlook and noise, specifically where the design proposed single-aspect units directly facing railway platforms. The applicant has been responsive in incorporating recommendations to improve the residential quality, and the development is now generally compliant with the Housing Design Guide's recommendations. Features include the incorporation of dual aspect flats where single-aspect flats were previously proposed to face the railway, the inclusion of balconies or wintergardens for every flat, and increased legibility of residential entrances (and changes to make entrances appear more welcoming). Buildings have multiple cores and the majority of units would be dual-aspect.

53 The independent assessment of the viability report notes that some of the units are larger than market standards, and that there could be potential for smaller units, thereby enabling more units on the site, and a better financial return. All but one of the units exceed the London Plan

space standards in table 3.3, some by approximately 10 sq.m., although these are a minority. Given the proximity of the railway and other constraints, the provision of larger units is supported in design terms, and is appropriate for the site.

Public realm

54 The design of the public realm is key to the success of the scheme. It must incorporate successful design for crowd management, ensuring that there is a welcoming environment for both residents and visitors alike, and a pleasant and safe environment around its quieter spaces, such as alongside the River Crane. The development achieves this through good landscape design. The submitted scheme provides spaces that would have different characters, assisted by their design and the design of the buildings around them – for example, the station plaza area would be unambiguously public, but narrower outdoor decks leading to residential areas would be more private. The character of the riverside area would be different again, moving from parking and access to a domestic scale. The design provides clear delineations between private and public space, which will be helpful in ensuring that crowd control and access could be effective.

55 Access to the River Crane, is supported, and is in line with the Mayor's London Plan policies seeking to improve access to the Blue Ribbon Network. The site will ultimately form part of a link between the sports fields to the east, past the town centre to the Harlequins Ground (The Stoop) to the west. The area is sufficiently overlooked, and the draft section 106 agreement provides for the future management and public access of this space.

Access

56 Inclusive design principles – if embedded into the development and design process from the outset – help to ensure that all of us, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The London Plan aims to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum).

57 The station access caters for less ambulant passengers, with public lift access behind the station gateline, between the ticket hall and platform level. There is only one lift per platform, and although alternative (but lengthy) access is available to the London-bound platforms, no alternative step-free access would be available from westbound platforms. A public outdoor lift is also available from podium to parking level, alongside stair access. While the provision of lift access within the public realm and at the main station entrance is supported and is an improvement on the current situation, the applicant was also requested by the Mayor within the comments issued on the previous application to consider whether provision for additional lifts elsewhere on the platforms, to accommodate lift failure and excess match day demand, would be feasible. In response, the applicant has stated that the applicant's contingency plan is to assist or carry passengers up the stairs as necessary, in addition to on-train and station announcements throughout the network. Although this is not the optimum situation, it is the same contingency plan that is currently undertaken at all other Network Rail and South West Trains platforms in the area.

58 Building access is acceptable, and the provision of 10% wheelchair accessible and adaptable dwellings is supported. Access to these flats will also be available by lift from the parking area, where three blue-badge parking bays and a drop-off/collection area would be located.

59 The proposal does not achieve 100% Lifetime Homes compliance. The non-compliant flats are located in Block C, between the railway and river. The earliest pre-application layout provided

flats that were Lifetime Homes compliant, but were unacceptable in terms of orientation (towards the railway) and overall living standards. The provision of the duplex flats within this block are not compliant, but have been designed to achieve as many of the Lifetime Homes criteria as possible, while providing a layout that allows future residents to obtain a reasonable living quality and outlook.

Transport

Comments from Transport for London

60 Transport for London (TfL) supports the proposed access to the station car park, 'kiss and ride' and taxi drop off facilities, which would be accessed from the existing junction on London Road. The applicant has applied TfL's *Interchange Best Practice Guidance* (2009) in designing the station access and in so doing has maximised interchange opportunities at the station. This process has generated: a larger station concourse and step free accessibility; an improved taxi rank and dedicated 'kiss and ride' facility; a proposal to move the southbound bus stop to be nearer the station entrance; a Pedestrian Environment Review System (PERS) audit to address pedestrian concerns; an increased number of cycle parking bays and sheltered cycle parking; and a commitment to provide Legible London signage.

61 Transport for London was consulted on the previous application considered by the Mayor on 17 March 2011. The proposed scheme has been adapted from that previously considered, although the applicant has re-submitted the original (November 2010) transport assessment. TfL is satisfied with this approach as the analysis represents a worst-case scenario. In addition, all of the issues raised previously with the transport assessment were resolved prior to consideration of that application, at which point it was concluded that *"subject to the transport mitigation and other measures identified above being secured either through the Section 106 agreement or appropriate planning conditions, this application is in general accordance with the relevant London Plan policies is therefore supported in strategic transport terms"*. This remains TfL's position. The original consultation comments have been revised to take account of the new London Plan (2011) and are set out below.

Site access and design

62 The proposed access to the station car park, kiss and ride and taxi drop off facilities, is supported. These would be accessed from the existing junction on London Road.

63 At TfL's request, the applicant has entered into discussions with the Royal Mail Group concerning the re-provision and improvement of the underpass from the station under London Road Bridge, which is an aspiration of the Council's Twickenham Station SPD. This is strongly supported as an opportunity to relieve the disruption caused by road closures to TfL bus services on Twickenham Stadium event days. The applicant's view that the underpass would not improve the efficiency of event day crowd management is acknowledged, and it is noted that the proposed event day management system has been endorsed by South West Trains.

64 The applicant has made passive provision within the development's design which will not obstruct the later construction of a walking route. A contribution towards the necessary works to enable pedestrians to use this access route, and for it to be made available by Network Rail for public use (once a connection exists on the other side of the road), should be included within the section 106 agreement.

65 The proposal for a larger station concourse area at the main station entrance is supported; this would double the capacity for match day queuing of west-bound passengers. The design

would also aid in relieving congestion from passengers queuing on London Road. However, the proposal would not affect London (east) bound passengers, for which the current match day queue management will remain in place.

66 Prior to Twickenham Stadium event days, Network Rail is requested to consult with TfL's LSTTC Events Co-ordinator to discuss traffic mitigation measures such as Variables Message Signs / UTC on London Road and the A316 Chertsey Road, and thereby improve the station interchange for customers.

Car parking and traffic impact

67 The car-free nature of the residential and commercial elements of the scheme (with the exception of three disabled spaces for residents) is supported. At a location with a PTAL of 5, this is in accordance with London Plan policy 6.13. A proposed planning condition stating that residents would not be eligible for parking permits for the controlled parking zones surrounding the development would be supported.

68 To encourage more sustainable travel by private vehicle, the proposal includes the provision of three public car club spaces in the car park of the station. The applicant would encourage residents' membership within their Residential Travel Plan. Additionally, the proposed reduction in commuter car parking spaces from 44 to 35 is welcomed. It is noted that three of these spaces would be for disabled users, and this level of provision would support the planned accessibility improvements at the station.

69 As requested by TfL and in line with the aspirations of London Plan policy 6.13, three of the commuter parking spaces would have electric vehicle charging points, and another four spaces would have passive provision.

70 The car parking management plan, included as part of the transport statement, is welcomed. The plan includes; a signage schedule; parking charges for commuter parking; regular car park monitoring surveys to measure rail commuter usage; marketing packs for residents; and a parking survey of surrounding streets prior to occupation and on an annual basis and reviewed with the Council. The applicant has committed to a planning condition to provide a detailed car parking management plan and necessary funding to address any issues that may arise from the car park surveys.

71 Due to the car free nature of the residential element of the development, the impact of the scheme on the local road network would be negligible.

Buses

72 The transport statement indicates that there would be approximately 27 AM peak (7am to 9am) and 28 PM peak (4pm to 6pm) bus trips from this site. Given the existing frequency of local bus services, this development would have a limited impact on bus service capacity.

73 The redevelopment of Twickenham station includes improved interchange facilities. This would require the relocation of the southbound bus stop serving routes 267 and 281, so that it is directly outside of the new station entrance. This would increase the stop's effective capacity to meet additional demand from the development and the station, and complies with London Plan policy 6.7. TfL requests further discussions with the applicant on the details of the relocation of this stop as soon as possible, following the grant of any planning permission.

Taxis

74 The proposed taxi arrangements are supported. The layout would include a three-space taxi rank within the station car park and a shared surface bay off London Road immediately outside the station (which would be restricted to 8pm to 2am for late night operation only). This location, which would be overlooked by the main station entrance, would improve safety for taxi users. In addition, the main taxi rank would be well lit and monitored by CCTV.

Walking

75 Within its transport statement, the applicant has indicated that 37% of trips to the site would use walking as the main mode. Legible London wayfinding totems are now in place connecting the station with Twickenham town centre, and therefore no further contributions are required. The proposal also includes provision of a riverside walk along the western boundary of the development site, which would increase pedestrian and cycle accessibility from London Road to Moor Mead Gardens. These improvements ensure the application is consistent with London Plan policies 6.9 and 6.10.

76 The Pedestrian Environmental Review System (PERS) audit carried out by the applicant is welcomed. This identifies deficiencies with the existing 'kiss and ride' and taxi facilities at the station and in the queuing capacity in front of the main entrance. The audit also supports TfL's view that the existing pedestrian crossing is in a good accessible location.

77 The applicant is making significant improvements to the station step free access and the proposals would increase the station concourse space by 530 sq.m. This would help to improve queue management on Twickenham stadium event days. The event day queue management system has been reviewed by South West trains, as requested by TfL.

Cycling

78 250 cycle parking spaces are proposed for commuters to/from the station and visitors to the site. This is an increase from the 80 spaces currently available and is consistent with London Plan policy 6.9. Additionally, 208 residential cycle spaces that will be provided. This provision is in excess of the London Plan cycle parking standards, and is supported. However, there is no indication of showering and changing facilities within the retail units or station staff areas. This is encouraged by TfL in order to promote increased levels of cycle use amongst employees.

Travel plans

79 The submission of the station and residential travel plans is welcomed. TfL's Smarter Travel unit has assessed these plans and both have passed the ATTrBuTE assessment used by TfL to assess content, and are of a very high standard. These travel plans should be secured, monitored, reviewed, and enforced through the Section 106 agreement. This would ensure the proposal is in line with London Plan policy 6.11.

Servicing and construction

80 A delivery and servicing plan (DSP) has been submitted. The plan details off-street servicing areas for the different elements of the scheme, with a coordinator to manage the loading bays. In particular, the restrictions on timings of servicing to avoid conflict with weekday peak time users of the station, and on event days, are supported. The DSP brings the proposals in line with London Plan policy 6.14. However, TfL notes that there would not be a concierge/drop-off facility included within this scheme, which would have reduced non/repeat deliveries to the residential units.

81 A construction logistics plan (CLP) has also been submitted. This notes the construction of the station podium to take place between February 2011 and April 2012, utilising planned rail closures (possessions) by Network Rail. It is clear that a proportion of the construction vehicles required for this site will access London Road from the TLRN A316 Chertsey Road. TfL requests that the CLP includes phased drawings showing construction routes for plant and vehicles, traffic management layout and signs for the works, together with analysis of access points to accommodate the swept paths of construction vehicles.

82 The applicant has stated that during construction, several night time closures of the bus lane will be necessary. In this event, the bus stop will be suspended and customers will be signed to the stop on Arragon Road. In order to minimise disruption, discussions with London Buses should be held at the earliest opportunity.

83 In line with TfL guidance 'Building a better future for freight: Construction Logistics Plans', the applicant has agreed to utilise selected operators that are committed to best practice and are a member of TfL's Freight Operator Recognition Scheme (FORS). Therefore, these plans, which must be secured by condition, accord with London Plan policy 6.14.

Summary

84 The proposed development would have minimal impact on the surrounding highways and bus network. The development would offer step free station access and redevelopment in line with the National Stations Improvements Programme and Network Rail's 'Access for all' initiative, relocation of the southbound bus stop and provision of several pedestrian access improvements including a larger station concourse area, improved interchange and an enhancement in the overall quality of the station environment.

85 Overall, subject to the funding or provision of the transport mitigation measures identified above, including a legal commitment to provide the pedestrian underpass on match days, the application is in accordance with London Plan transport policies.

Climate change

86 The proposed development would achieve a Code for Sustainable Homes level of 4, and a BREEAM rating of 'excellent' for the non-residential elements. The achievement of these standards is welcomed, as is the commitment to a range of measures to improve building sustainability, such as green roofs and water-saving fittings.

87 No existing trees would be removed, and additional trees would be planted alongside the river as light mitigation for river ecology. No significant effects are foreseen for protected species, and incorporation of other biodiverse-friendly features within the scheme could be secured under a planning condition.

Energy

88 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. The proposals are broadly acceptable; however, further information is required before the carbon savings can be verified.

Energy efficiency standards (be lean)

89 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by the Building

Regulations. Other features include mechanical ventilation with heat recovery and energy efficient lighting.

90 Based on the information provided, the proposed development does not appear to achieve any carbon savings from energy efficiency alone, compared to a 2010 Building Regulations compliant development. The applicant should model additional energy efficiency measures and commit to the development exceeding 2010 Building Regulations compliance through energy efficiency alone.

District heating (be clean)

91 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network, should one become available.

92 The applicant is proposing to install a site heat network to provide hot water and space heating, with all dwellings and non-domestic building uses connected. A diagram showing the heat distribution main linking all buildings on the site has been provided. The site heat network would be supplied from a single energy centre located in the lower ground floor plant room in Block B. Further information on the floor area of the energy centre should be provided.

Combined Heat and Power (be clean)

93 The applicant is proposing to install three gas fired CHP engines, each with an output of 5.5 kW power and 13.3 kW heat, as the lead heat source for the site heat network. Load profiles have been provided to illustrate the sizing.

94 A reduction in regulated carbon dioxide emissions of 56 tonnes per annum (15%) is suggested through this second part of the energy hierarchy.

Renewable energy technologies (be green)

95 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 25 kWp of photovoltaic (PV) capacity across the Block A, Block B and Block C roofs. Drawings showing indicative PV locations have been provided.

96 A reduction in regulated carbon dioxide emissions of 12 tonnes per annum (4%) will be achieved through this third element of the energy hierarchy.

Overall carbon savings

97 The estimated regulated carbon emissions of the development are 173 tonnes of carbon dioxide per year after the cumulative effect of energy efficiency measures, CHP and renewable energy has been taken into account.

98 Taking into the comments above, the applicant should provide an estimate of the overall reduction in regulated carbon dioxide emissions, expressed in tonnes per annum and percentages, relative to a 2010 Building Regulations compliant development.

Ambient noise

99 Significant officer concerns were expressed at the pre-application stage, regarding the potential impact of noise and vibration from trains on residential units. Although it is noted that

there are no non-stopping trains at this station, ambient noise levels would be significant due to station activity, and London Road activity. The redesign of the majority of units to face away from railway areas, or at least be dual-aspect to provide some quieter internal areas within affected flats, is supported. However it is noted that there are areas of the scheme where forced ventilation would still be necessary.

100 Ambient noise levels used for the modelling process were recorded during a crowd event, to utilise a worst-case scenario. The applicant's noise report notes that, "the biggest impact was from the loud-hailer used by station staff to direct people to the appropriate trains." Noise levels were on the site were within noise exposure levels of B (daytime) and C (night-time) of national Planning Policy Guidance (PPG) 25, which offers the following definitions:

- B: "Noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to ensure an adequate level of protection against noise."
- C: "Planning permission should not normally be granted. Where it is considered that permission should be given, for example because there are no alternative quieter sites available, conditions should be imposed to ensure a commensurate level of protection against noise."

101 The report recommends that with appropriate mitigation measures, there would be a comfortable residential environment for new residents and impact on existing residents that would not be unreasonably detrimental (especially during the construction stage). Measures for the proposed flats include acoustic ventilation and double-glazing, with vibration dampening measures on the lower levels of the development.

Blue Ribbon Network / Flood risk

102 The opening of the riverside for public access is supported and is in accordance with the London Plan's desire to enable public use of the Blue Ribbon Network. The river is non-navigable and unsuitable to be used for construction transport or access.

103 In its flood risk assessment summary, the applicant states that neither the Environment Agency nor Thames Water hold any record of flooding in the area; that the site is located within Flood Zone 1 a minimum of approximately 650mm above the level of a 1 in 100 year flood event (including the predicted effects of climate change); and the Environment Agency's Modelled Flood Extent Map confirms that safe dry access will be available throughout the duration such an event. While the assessment appears to be sound, confirmation of the scheme's acceptability will be sent to the Council by the Environment Agency, which is a statutory consultee.

Local planning authority's position

104 The proposal does not comply with the Council's Twickenham Station SPD, due to the height of the scheme exceeding the document's guideline heights. Officers are yet to make a recommendation on the both the previous and current schemes, but the Council is understood to be opposed to the former.

Legal considerations

105 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the

Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

106 There are no financial considerations at this stage.

Conclusion

107 London Plan policies on the world city role and the site's mix of uses, housing and affordable housing, density, tall buildings and views, urban design, access, transport and parking, climate change, ambient noise, biodiversity, the Blue Ribbon Network and flood risk are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **World City role / mix of uses:** The proposal would deliver an improved station prior to the 2015 Rugby World Cup and is supported. The mix of uses is acceptable and is compliant with the London Plan.
- **Housing / affordable housing:** The proposal does not comply with the London Plan, as no affordable housing would be provided. However given the competing priority of ensuring the upgrade of the station facilities, on balance the non-provision of affordable housing is appropriate in this case.
- **Density:** The residential density is compliant with the London Plan density matrix.
- **Tall buildings / views:** The proposal complies with the London Plan.
- **Urban design:** The proposal complies with the London Plan.
- **Access:** Although the proposal is not compliant with London Plan recommendations for 100% Lifetime Homes provision, the split-level design of some dwellings makes this difficult to achieve. However the constraints of the site have informed layout and orientation of these dwellings, and their design is considered to be an acceptable compromise.
- **Transport / parking:** The proposal is generally compliant with the London Plan, although there are some minor outstanding issues regarding section 106 commitments.
- **Climate change:** The proposal would incorporate a range of sustainability measures, and is generally compliant with the London Plan, although there are some minor outstanding issues.
- **Ambient noise:** The proposal complies with the London Plan.
- **Blue Ribbon Network / Flood Risk:** The proposal complies with the London Plan, although the consultation response of the Environment Agency is required to ensure that the scheme is acceptable with regard to flood risk.

108 Whilst the application is broadly acceptable in strategic planning terms, on balance, the application does not comply with the London Plan.

109 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Transport:** The proposal should include a contribution to improve the underpass under London Road, providing access to the station.
- **Climate change:** The applicant should model additional energy efficiency measures and commit to the development exceeding 2010 Building Regulations compliance through energy efficiency alone. The size of the proposed combined heat and power (CHP) plant should be confirmed.
- **Flood risk:** The response of the Environment Agency will be assessed with regard to flood risk.

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