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planning report PDU/2619/02

29 February 2012

## Twickenham Station, London Road, Twickenham

in the London Borough of Richmond upon Thames

planning application no. 11/1443/FUL

### Strategic planning application stage II 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 on a podium across existing railway lines. The development comprises three buildings of up to seven storeys (measured from an elevated podium), up to a height of approximately 28 metres from ground level, 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

Outstanding issues at the consultation stage, including **transport, climate change, and flood risk**, have been resolved, and there are no outstanding strategic issues.

The proposal is the subject of **significant local opposition**, with in excess of 3,000 objections submitted directly to the Mayor. This response includes proposals for an **alternative scheme** that proposes a station upgrade that may have the potential to be delivered in time for the 2015 Rugby World Cup.

### The Council's decision

In this instance, Richmond upon Thames Council has resolved to grant permission.

### Recommendation

That Richmond upon Thames Council be allowed to determine the application itself.

### 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. This was referred to the Mayor under Category 2C of the Schedule to the Order 2008: "Development to provide ... (d) a railway station or tram station".

2 On 17 October 2011, the Mayor considered planning report PDU/2619a/01, and subsequently advised Richmond upon Thames Council that the application did not comply with the London Plan, for the reasons set out in paragraph 107 of the above-mentioned report; but that the possible remedies set out in paragraph 109 of that report could address these deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, additional information has been provided in response to the Mayor's concerns (see below). On 19 December 2011, Richmond upon Thames Council agreed to approve the application, and on 17 February 2012 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged or direct Richmond upon Thames Council under Article 6 to refuse the application. The Mayor has until 1 March 2012 to notify the Council of his decision and to issue any direction.

4 For the purposes of determining this application, the Mayor has delegated his powers to the Head of Paid Service. As such, the power to issue a direction to Richmond upon Thames Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application is not available.

5 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.

6 The Secretary of State has issued an Article 25 notice dated 15 February 2012, under the Town and Country Planning (Development Management Procedure) Order 2010, preventing the Council from granting permission for the scheme without his specific authorisation. This is so that he can consider whether to direct under Section 77 of the Town and Country Planning Act 1990 that the application should be referred to him for determination.

7 The decision on this case, and the reasons will be made available on the GLA's website [www.london.gov.uk](http://www.london.gov.uk).

## Update

8 At the consultation stage, Richmond upon Thames Council was advised that the application did not comply with the London Plan, for the reasons set out in paragraph 107 of the above-mentioned report; but that the possible remedies set out in paragraph 109 that report could address these deficiencies:

- **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.

9 It is noted that following the Mayor's consultation, Richmond upon Thames Council adopted its Development Management Plan Development Plan Document (DMP) on 1 November 2011. This has the effect of integrating the policies for development of the site, as given within the Council's Twickenham Station Supplementary Planning Document (SPD) into the DMP, with a specific focus on height limits for new development. As noted at the consultation stage, the proposal does not comply with the SPD; nor does it comply with the DMP. However, having considered the impact of the development at the consultation stage, the Mayor was of the view that although the development did not comply with locally adopted policy, the development would be appropriate within the context of the area and its regeneration, particularly given the strategic significance of achieving improvements to the existing station.

## **Transport**

10 At the consultation stage, the Mayor highlighted issues in relation to transport, notably site access, parking, bus infrastructure, the quality of the pedestrian environment, and construction and servicing.

### Site access and design

11 This application would assist in delivery of a larger station concourse and step free access, an improved taxi rank and dedicated 'kiss and ride' facility and a commitment to provide Legible London signage. Transport for London (TfL) supports the principle of providing an improved station and interchange. A Grampian obligation is required restricting occupation of more than 50% of the residential units until the station building is completed and available for occupation. This must be secured through the s106 agreement.

12 At TfL's request, the applicant entered into discussions with the Royal Mail Group concerning the re-provision and improvement of the underpass from the station under London Road Bridge. The application includes passive provision for connection under London Road. A Grampian obligation is required which restricts substantial completion of phase 2 (station buildings and residential) until refurbishment of the subway has been completed. This must be secured through the s106 agreement.

### Parking

13 TfL supports the car-free nature of the residential and commercial uses. Three car club spaces are provided. This must be secured through the s106 agreement. A planning condition has been included restricting residents from eligibility for parking permits within the controlled parking zones surrounding the development.

14 TfL welcomes the proposed reduction in commuter car parking spaces from 44 to 35. TfL notes that three of these spaces are for disabled users and this level of provision will support the planned accessibility improvements at the station. Three of the commuter parking spaces would have electric vehicle charging points, and another four spaces would have passive provision.

15 TfL supports the 250 station cycle parking spaces, and 208 residential spaces which is consistent with London Plan policy 6.9, including Table 6.3.

### Buses

16 The redevelopment of Twickenham station includes improved interchange facilities. This will require the relocation of the southbound bus stop, which is secured by condition, and the council must consult with TfL prior to discharge of this condition. The works are to be funded as part of the wider s278 agreement.

### Walking and cycling

17 TfL supports the provision of a new riverside walkway along the western boundary of the development site. This increases pedestrian and cycle accessibility in the area which ensures consistency with London Plan policy 6.10 and London Plan policy 6.9.

### Travel plans

18 The proposed travel plans must be secured, monitored, reviewed, and enforced through the Section 106 agreement.

### Servicing and construction

19 A delivery and servicing plan (DSP) will be secured by condition.

20 A draft construction logistics plan (CLP) has been submitted. It is noted that a planning condition and proposed s106 obligation will include adequate provisions for a detailed demolition and construction method statement (DCM) is submitted and agreed in writing by the Local Planning and Highways Authority. It is understood that a temporary crane will be used at pre-agreed times, when the station is closed. This crane will be based on Mary's Terrace and full notification and consultation will occur with the applicants to agree the timescales. TfL notes the residential car parking spaces will be temporarily relocated to the station compound on Station Yard during this period. This land will be shared (but with segregation) for the remaining construction traffic. TfL considers that the DCM adequately covers the demolition and construction process necessary to deliver the associated proposals.

21 The council must consult with TfL prior to discharge of planning conditions affecting the strategic transport network including the bus lane adjacent to the station.

### Summary

22 TfL agrees with the council's view that the associated conditions attached to the development would ensure that all outstanding transport issues have or will be addressed through the s106 agreement.

### **Climate change**

23 The size of the combined heat and power (CHP) unit has been confirmed and would be appropriate to meet a base load of approximately 67% of the heat demand of the site. This is appropriate and GLA officers have no further concerns regarding this matter.

24 A condition of the draft approval specifies that the development would need to "incorporate energy efficiency measures which secure a Building Carbon Emissions Rate that shall not exceed the development's 2010 Building Regulations Target Emission Rate", using 2010 Building Regulations software. Although this is not as ideal as providing an assessment in advance of the decision making process, the condition is adequate for ensuring compliance with the energy hierarchy of the London Plan.

### **Flood risk**

25 The Environment Agency has confirmed that it has no objection to the scheme with regard to flood risk, and that the site is within a flood zone 1 (low risk) area. The Agency suggested a suitable condition to form part of the decision notice regarding the integrity and stability of the

river wall flood defences, and this has been applied. This satisfies the concerns raised at the consultation stage.

## **Response to consultation**

### Representations to the Council

26 The Council received individual letters and standard signed letters from approximately **1,760 residents**, and a petition with **3,381 signatures**. Letters of objection were also received from several local residents' groups. An annex containing a list of all issues is attached to this report. In summary, the most frequently raised issues of objection are:

- The height of the proposal and non-compliance with adopted Council policy.
- The scale of the proposal and its impacts on residential amenity and views, both locally (such as along the High Street and from Mary's Terrace) and long-range (including views from Richmond Hill).
- A belief that the proposal is being 'rushed through' the planning system for the benefit of the 2015 Rugby World Cup.
- Comments on the inappropriateness of the design in terms of its style and appearance, massing and bulk, and layout.
- The lack of affordable housing provision.
- The amount of car parking, the impact on other transport patterns such as crowds returning from events at the stadium, and the operation of the station and its ability to function effectively.

27 The Council also received approximately **500 letters** of support for the proposal, noting the scheme's benefits to the station and the town centre, the public realm, its design, and impacts on transport.

28 Comments were also received from the following consultees:

- Environment Agency: Initial comments noted the missed opportunity to restore the ecological value of the River Crane, by relocating its bank within the site. The removal of some trees was supported, and conditions were requested regarding contamination and flood defences. Following discussions between the Agency, the Council and the applicant, the Agency issued a further letter that noted that there is no objection to the proposal on flood risk grounds, and that although recognising that environmental improvements would not be financially viable, that the section 106 should provide scope for funding, should financial conditions change. Further discussions were held, and the Agency suggested alternative sites where bank naturalisation and habitat enhancement could occur, with benefits for local biodiversity and ecology. A contribution for these has been secured within the section 106 agreement.
- Thames Water: Standard comments on drainage and water pressure, with no objections. Additional comments on water runoff were also supplied.
- Natural England: No comments.
- English Heritage (archaeology): No objection; request for a standard condition to be added to the decision notice.

- Rugby Football Union (RFU): Offers support for the application, stating that an alternative scheme would be unlikely to be delivered in time for the 2015 Rugby World Cup (although GLA officers note that the alternative scheme submitted by the Twickenham Residents' Action Group, and described below, has been further developed since this response). Concerns are expressed that the scheme does not improve the platforms. Additionally, the RFU submitted the results of an online petition with **3,661 signatories** supporting the improvement of the station for the Rugby World Cup, although the petition does not directly describe the current development.
- South West Trains: Offers support for the application, and notes that options for funding improvements at platform level are currently being identified. Additional correspondence to the Council provided confirmation that track possessions are likely to take place in late 2012/early 2013 (rather than 2011 as planned) and confirmation that additional possessions for construction are unlikely to be acceptable.
- London Fire and Emergency Planning Authority: No objections, and standard comments issued.
- Metropolitan Police (crime prevention and design): Requests conditions on approval regarding provision of relevant security systems/lighting and landscaping plan.
- British Transport Police (design): Notes that crowd management on the platforms is the responsibility of South West Trains.
- South West London NHS: States that there would be a negative impact on local healthcare provision, in line with the findings of the Environmental Statement.

29 In addition, a submission from Network Rail supports the application, although it is noted that the organisation forms part of the applicant:

30 The applicant also undertook its own local campaign to garner support for the scheme, and submitted to the Council **433** signed cards stating that the signatories supported the scheme, a record of **150** online support pledges for the scheme, a residents' petition with **73** signatories supporting the proposal, and a petition supporting the scheme signed by **59** Twickenham business operators and representatives.

#### Representations to the Mayor

31 The application was the subject of a significant and sustained campaign by the Twickenham Residents' Action Group (TRAG), which has collected a number of letters and petition signatures, as well as comments addressed directly to the Mayor. TRAG has collated these responses, which have been verified by GLA officers and made available to the Mayor several days before the date of this decision, although the responses have been edited for inclusion within this report. The comments were presented to GLA officers by TRAG, accompanied by a local councillor and Tony Arbour AM.

32 TRAG requested residents sign a letter that noted their objection to the development on the basis of non-compliance with London Plan policy 7.7, with the following reasons (reproduced from the letter):

- "The fact that the Solum application was clearly not backed by "significant local support for the public benefits of the proposal", which is contrary to the site specific policy embodied

in the Council's own Development Management Plan (DMP), which was adopted on 1 November 2011.

- "The fact that the acceptable maximum height of any proposals for the Station site, also incorporated in the DMP, was exceeded in the Solum proposals.
- "The fact that a viable policy compliant alternative for the Station site (see below) that has the full support of the Community, has been commissioned, designed, costed and programmed, both to highlight deficiencies in the Solum proposal and to demonstrate that there is clearly another way.
- "The fact that the proposals do not comply with the "plan led" approach advocated in Policy 7.7 of the London Plan for the consideration of strategic applications and that the Local Planning Authority has wilfully failed to determine the current application in accordance with their adopted policy which is less than two months old."
- The letter also noted that the "application fails to meet the requirements of Network Rail's Guide for Station Planning & Design dated July 2011 and only provides the bare minimum level of station facilities and minimal improvement for match day visitors as acknowledged at the planning committee meeting by Solum and their design team".

33 In total, **1,194** copies of this letter were submitted to the Mayor, with the majority of these from local residents.

34 The other main component of the TRAG response is a petition containing **1,723** online signatures, again with a significant majority of respondents living in the local area. The grounds of the petition are reproduced below:

- Lacked public support - less than 20 comments to the Council supported the height of the residential development and over 5,500 opposed it.
- Poor design - the poor design was not challenged by the Council who did not seek any advice.
- Station fit for purpose - the new station will only provide the bare minimum level of station facilities and minimal improvement for match day visitors (quotes from the developer) and fails to meet the requirements of Network Rail's guide for Station Planning and Design (July 2011).
- Social housing - no social housing is provided whereas the standard requirement is 50%.

35 A substantial number of individual comments from residents are also included within the response. Details of the letters and a copy of the petition were also prepared to be presented to the London Assembly (Plenary) meeting on 7 March 2012, although the date of this determination precedes the meeting, and as such the petition will not be considered by the Assembly. The prayer of the petition is as follows: "That the Mayor of London and Assembly Members refuse the application of the London Borough of Richmond upon Thames Council (LBRuT) to implement the decision of the LBRuT Council *Planning Committee* to accept the Solum Regeneration Proposals for the development of Twickenham Station made at an Open Meeting of 19<sup>th</sup> December 2011."

36 In a further submission, the designer of the alternative scheme (see below), acting on behalf of TRAG, noted that the scheme had not been subject to a formal design review: that the application had not been referred to the Design Council/CABE, and that the report of the

Twickenham Advisory Panel had not been incorporated within the Council's report to its planning committee. The Council has confirmed that the Panel has no formal role in the decision making process (it was set up by the Leader of the Council in an advisory capacity). It is noted that although this scheme was not referred to the Design Council/CABE, the original scheme was, and was criticised for its architectural quality. Nonetheless, the strategic design issues have been thoroughly assessed by GLA urban designers, and the strategic principles of the design agreed by the Mayor within his consultation comments at stage 1.

37 At the time of writing, the Mayor has also received 49 direct responses, mirroring the concerns already expressed to the Mayor and Council. Among these were letters from the Ham & Petersham Association and the Open Spaces Society, objecting to the impact of the proposal on the protected view from Richmond Hill. Additionally, the latter organisation also objects to the proposal on the basis of a lack of significant local support, the proposal not complying with Council or London Plan policies, or with Network Rail's own design guidance.

38 A letter from Vince Cable MP was received by the Mayor. In his letter, Dr Cable notes that he is receiving a strong response from his constituents who are affected by or concerned about the scheme. He states that, "(residents) have pointed me to some quite glaring basic deficiencies in the approved development such as the lack of toilet or waiting room provision. They told me that the plans are said to meet Network Rail's minimum standards and compared the redevelopment very unfavourably with Wembley Stadium, which has vastly better provision for passengers". Additional concerns were raised in his letter regarding the appropriateness of the development to serve as a major transport hub, the height of the development, and the lack of affordable housing. He concludes by stating, in support of residents' objections: "I hope that in light of the evidence that is presented to you that you will agree it is appropriate to take over the application."

39 Previous informal discussions between the applicant and the GLA's access officer noted the Mayor's concern that adequate toilet and waiting facilities should be made available as part of any future station improvement, although it was agreed that this would probably be more appropriate at platform level. It is noted that the draft section 106 agreement that an applicant's contribution will enable platform and other related access works to proceed.

40 Letters of support for the scheme have been received from the Rugby Football Union, South West Trains, and Network Rail, with similar content as described previously within this report.

41 Some residents have raised concerns regarding the Council's decision making process. It is noted that alternative avenues exist for some complaints and the Mayor has no role in determining the appropriateness of the Council's response, other than based on planning concerns as described by the Mayor of London Order 2008. Additional concerns regarding the level or type of information provided by the applicant to the public (in canvassing support for the scheme) have also been raised, but other than the number of responses being stated above, this information has not influenced GLA officers in their assessment of the strategic planning issues.

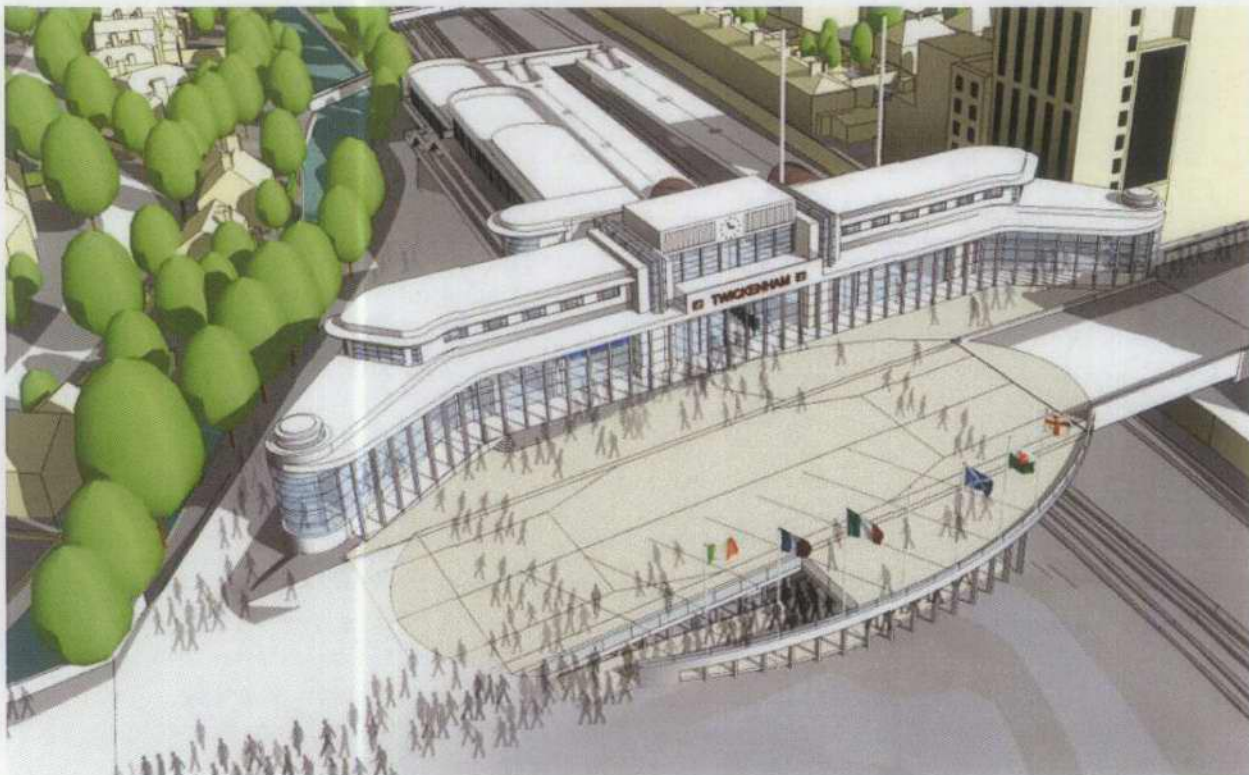
42 All comments have been noted and have been addressed within the Council's committee report, the conditions of the draft planning permission and the provisions of the draft section 106 agreement, and within the Mayor's previous consideration of this scheme, as expressed in his consultation comments.



### Alternative proposal

43 As part of its objection to the application scheme, the Twickenham Residents' Action Group (TRAG) commissioned an alternative scheme, which includes details of design, viability, and a construction schedule.

44 The design of the scheme is influenced by the Art Deco style, which was the style originally proposed for the station when improvements were mooted in the 1930s. Several other stations in the area, such as Surbiton station, were completed in this style. The development would incorporate a new station hall, and retail facilities on a podium smaller than that proposed within the current application, and a three storey block of 32 one- to three-bedroom flats projecting to the rear. The development would also include an increased level of car parking provision at ground and lower-ground level, access improvements from local residential streets, and a new public space *in front of the station*, incorporating under-road access and providing opportunities for links with future development on the Post Office site, facing the station to the west of London Road.



Above: Image of the alternative scheme proposals. Source: Twickenham Station 2015 Conversion Plan document, TRAG/Landmark.

45 There does not appear to have been any input into the application from Network Rail or the applicant, although it is understood by GLA officers that TRAG representatives will meet with these organisations with a view to progressing its proposal.

46 An application for planning permission for this alternative scheme would likely require referral to the Mayor for the same reason as the current application scheme. Nonetheless, regardless of any merits of an alternative scheme, the Mayor must determine the current application based on its strategic planning considerations, and compliance with the London Plan. The current application is considered to be in compliance with the London Plan.

## Legal considerations

47 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. The Mayor must also have regard to the guidance set out in GOL circular 1/2008 when deciding whether or not to issue a direction under Article 6.

## Financial considerations

48 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (*Costs Awards in Appeals and Other Planning Proceedings*) emphasises that parties usually pay their own expenses arising from an appeal.

49 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

## Conclusion

50 Whilst it is acknowledged that there is significant local public opposition to the proposals, along with a lesser level of local support, the issues identified at the consultation stage have been resolved. Although there are some aspects of the development such as affordable housing which do not strictly accord with London Plan policy, taking into account the associated benefits of the proposal, on balance, the proposal complies with the London Plan. Should an application be made for the alternative scheme, the Mayor would consider it on its own merits, as he has considered the strategic issues on this current scheme on its own merits.

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**Planning report PDU/2619/02  
Twickenham Station  
Annex 1**



This annex has been reproduced from the Richmond upon Thames Planning Committee report and addendum, and is a schedule of the representations received by the Council prior to the application being heard at the Committee meeting.

**Cole Park Residents Association**

Objects on the following grounds:

- Does not meet the Council's SPD criteria.
- No attempt to show a lower storey development on the £3m deck
- Minimal station improvements and disproportionate for a public usage benefit compared to developer profit and long term negative effect on residents.
- Inappropriate high rise development within a suburban and local townscape.

**Mary's Terrace Residents Group**

Objects on the following grounds:

- Gross overdevelopment causing permanent visual harm to the local environment in which BTMs exist.
- Damage to amenity of Mary's Terrace resident due to scale, height and bulk.
- Sense of enclosure and narrow dark tunnel created due to the cliff like 9 storey high wall along Mary's Terrace.
- Cumulative impact of the hotel and all blocks should be considered and this would create a continuous high rise wall of development unacceptable in a suburban location that features modest 2-storey homes and the River Crane.
- Poor design quality with flats overlooking each other and those in Block C overlooking the bedrooms of Mary's Terrace homes.
- Not an attractive landmark that enhances Twickenham.
- Extreme wind impact would be caused due to the development and hotel and a desk based wind study is inadequate. Assumptions that this is a typical urban site and at ground level and applying mean factors are invalid.
- Increased shadowing in months between the autumn and spring equinox and analysis limited to only one day a year.
- No details of environmental improvements to the River Crane, the introduction of the path is likely to cause damage to the natural environment and nature, personal safety, litter and maintenance.

**Friends of the River Crane (FORCE)**

In principle, FORCE welcomes the proposed new public access to Moormeads Park along the *Crane corridor* on the provision that the route is carefully designed with a commitment to manage and maintain the route in the long term, the implementation of environmental improvements and that the development is not provided at the expense of the environmental value of the corridor. Key comments within their letter are set out below:

- Ecological mitigations proposed are of a minor benefit to the corridor.
- Planting schemes should be mindful of the wider environmental aspirations of the corridor.
- No commitment from the developer to include the enhancements identified within the Twickenham Station and Surroundings SPD such as the incorporation of natural or semi natural banks and the creation of a riverside walk which incorporate ecological enhancements.
- Development should include the movement of the concrete channel wall back one metre to allow in-stream planting.
- Expect the longer term management of Japanese knotweed to be included in any land management arrangements.
- Safe access for maintenance of river and its bank required from the south and an agreement to the responsibility for the removal of litter and general maintenance.
- Measured policy to tree retention, removal and planting to improve overall quality of environment.
- Development proposals would have an adverse impact upon the views along the river and no commitment to implement any improvements to local views along the river.
- Concerns regarding shading of the river and its bank an the environmental impact requires evaluation, requirement to allow daylight to penetrate this area and minimise the introduction of artificial light.
- No assessment of any impact of additional light into the corridor on its value for bats.
- Public access should include significant environmental improvements, respect privacy of Cole Park Road properties, consider environmental impact, safety, management of anti social behaviour, levels of lighting, provision of visual links, incorporate bins and signage, allow for both pedestrians and cyclists.
- Monitoring and management of impacts required along corridor, avoid tarmac surfaces, design of fencing to be considerate, wider areas to be incorporated for public use.
- A direct link between the post office site and the station is not set out in the application.
- No consideration of archaeology.

### **Richmond AID (Advice and Information on Disability)**

The following points are raised:

- The London Road lay-by set aside for evening taxis should be able to be used for disabled travellers as a pick up/drop off point to aid access/egress to the station.
- The bus stop needs to be further south as it is too close to the cafe entrance and planters.
- The pedestrian crossing on London Road should be moved further south.
- The residents' disabled bays should have a dual use with the kiss and ride for disabled travellers to allow more time for assistance.
- Concern that only one lift is proposed to the kiss and ride area and another required in the event of a break down.

- Concern that there would not be 10% fully disability accessible units and that 75% would be disability adaptable thereby leaving wheelchair users with the cost of adaptation.
- Ticket office should be accessible for disability groups and surfaces on sections of the plaza smooth to allow for wheelchair accessibility.
- *Seating by the kiss and ride area and hand rails on the stairs required and planters should not obstruct access.*
- No indication of disabled toilet facilities other than on the platforms.

**Metropolis Planning Design on behalf of Twickenham Residents Action Group (TRAG)**

Objections on the following grounds:

- Contrary to planning policy and the considerations with regard to time constraints (2015 Rugby World Cup) and viability are fundamentally flawed.
- Misrepresentation and ignored views of the community set out in the Statement of community Involvement.
- Flawed views analysis with cropped/condensed photographs.
- *Presents a solid/unrelenting wall of development, with little transition and poor design quality.*
- Lack of articulation in the massing
- Scale, height and bulk will have an unacceptable and overbearing impact on the character and appearance of the townscape in local views and distant cumulative views in particular Richmond Hill.
- Unacceptable impact on the amenity of residential occupiers of Cole Park Road and Mary's Terrace and disagreement to the categories of impact envisaged.
- Failure to respond to townscape context and surrounding residential character and adverse impact on character, setting and outlook of the BTMs on Mary's Terrace.
- Reduction in unit numbers not reflected by reduction in volume of the scheme and this coincides with the number of affordable housing units removed from the scheme.
- *Number of habitable rooms in the scheme has not changed significantly and thus should not be less valuable than the first scheme.*
- High density when factoring in the retail units.
- Previous comments by CABE.
- Poor quality accommodation: crowded, overdeveloped, cramped, claustrophobic, prone to noise, limited separation distances, reduced levels of day/sunlight and overshadowing. A third of flats in Blocks A and B are single aspect with many looking directly over platforms reducing amenity.
- Poor location and quality of residential entrances.
- Requirement to view the viability assessment to effectively comment on the loss of and value of the affordable housing.
- Use of RFU money/other revenue to fund station improvements.
- No alternative solution presented in the ES regarding a situation with no or a limited podium.
- *As the cost of the podium is justified to build on top of it (a self fulfilling prophecy) the development profit should be lowered as they are voluntarily incurring the expense of the podium in order to achieve greater returns.*

A further letter from **Metropolis PD** has been submitted clarifying the reasons for raising the issue of consideration for alternative proposals. This is set out below:

- The applicants have not assessed if a policy compliant alternative scheme would be viable. As viability is a material consideration there is no evidence that alternative schemes are unviable or unrealistic.
- As such no weight can be afforded to the applicant's viability argument as being material.

#### **Odyssey Consulting Engineers on behalf of TRAG:**

With regard to the submission of the transport assessment and EIA have the following statements:

- No significant objections to the implications of the proposal on a typical day.
- Recognise current constraints on events days (platform length, train length and station size).
- No assessment in the Transport Assessment of the increased train capacity and natural growth on the station and surrounding roads.
- Limited increase in the eastbound queuing area and with growth a 'nil detriment' would not be achieved.
- Potential queuing arrangements not set out in the existing drawing of ingress for east bound passengers on match days and this space would be lost as a result of development (although the objection recognises that Network Rail and the Police may have valid reasons for not utilising this space).

#### **York House Society**

Objects on the following grounds:

- Traffic and parking – exacerbate parking problems and congestion, cut the existing provision of parking at the station and make no provision for passenger interchange between buses and the railway.
- Pedestrian safety – due to the proximity of the blocks and narrowness of the pavement on London Road.
- Urban Design – overlarge, out of keeping, forbidding and fortress like in the conservation area and threatening. Cheap materials lacking dignity and elegance. The station entrance is grandiose and unnecessary. Block C has no relationship with the river environment. Further eyesore from Richmond Park.
- Massing and density – Regal house is a prime example of the worst kind of development for Twickenham and should not be used to make comparisons. The scheme is contrary to the adopted SPD. Contrary to existing density patterns creating pressure on schools, medical and transport facilities and infrastructure. Harm from drawing footfall away from the town centre.
- Lack of affordable housing, artificial time constraint and rush to push it through for the 2015 Rugby World Cup.
- YHS supports a simple redevelopment with lower height, better design and in keeping with the needs of the town and community.

**Letters from 505 households received supporting the application on the following grounds:**

Regeneration/benefits

- Station needs replacing and the area regenerating (poor and depressing point of entry to the town) and this will have a trickle down effect to the rest of the town.
- Regeneration only achieved through cross subsidy from residential provision.
- Improves safety of the station and the additional homes will improve surveillance.
- Lack of action will result in further decline and decay.
- Benefit and enhancement to the town (shops and restaurants) and visitors, particularly crowds using Twickenham Stadium.
- Investment and additional housing to support local retail is required.
- Benefit to first time buyers and provides a housing need.
- It would provide much needed employment.
- Integration with the town centre welcomed.

Design

- Aesthetically pleasing and environmentally friendly.
- Proportionate, tasteful and balanced redevelopment and a great addition to Twickenham without affecting the existing sky line.
- Impact of height acceptable given that it sits next to and no taller/in scale with and softens Regal House.
- The hotel development is adding to the skyline so unfair that this development cannot.
- Twickenham town centre needs a focal point.

Transport

- Will reduce crowding and congestion around the station with better pick-up/drop-off points.
- Provision of an efficient transport hub.
- Increase in the capacity of the station.
- Benefit of lifts and disabled access.

The public realm

- Benefit of access to Moormead Park.

Other matters

- Some letters cite the requirement for adequate school places and other necessary infrastructure as well as affordable housing if this were to be approved.
- Some concerns have been raised with regard to the architecture to Block C.
- The entrance to the station has been cited as being bland and *sustainability* standards are not ambitious enough.

- A request for lifts and walk ways between platforms and escalators from the platforms to ground level.
- Concern raised of 'NIMBY-ism'

#### Non-material objections

- Matters not related to this application (drawing similarities with the stalled Twickenham Riverside development).

#### **Letters from 805 households received objecting to the application on the following grounds:**

##### Design/scale/mass

- Exceeds the height set out in SPD and dwarfs the adjacent hotel building.
- Creation of a utilitarian/unimaginative/imposing/barricade/overbearing/cliff like entrance into the town with no sense of arrival and lacking in inspiration.
- Scale and proportion with the rest of the town inappropriate/incongruous and with the period property that gives Twickenham its unique quality.
- Does not reflect the riverside nature or village feel of Twickenham.
- Brutal, ugly and alienating tower blocks with no architectural merit.
- Ultra modern construction looks cheap with metal and glass design clashing with other predominantly brick faced buildings in the area.
- No assessment on the impact on Heatham House.
- Dubious/drab/austere/pastiche neo Georgian style housing which does not suit the area.
- No objections to a low rise development.
- Regal House should not be used as a precedent.
- Comparisons with Croydon and Manhattan.
- Would clone the town and lose identity.
- The construction of the podium will allow more floors to be added in time.
- Improvements required to the routing of trains, i.e. platform 2 and 3 for eastbound trains and 4 and 5 for west bound trains.
- Impact on the views to and from Richmond Hill and view from Star & Garter House and clutter in the landscape.
- Adverse impact on conservation areas.

##### Neighbour amenity

- Overshadowing and loss of sun/daylight.
- Loss of privacy.
- Anti-social behaviour on the plaza and its furniture and river walk.
- Noise and disturbance and increase in population near Cole Park Road

##### Environmental concerns

- Creation of a wind tunnel on London Road and other freak weather phenomenon.
- Adverse impact on schools.



- Adverse impact on healthcare facilities.
- Pollution of the River Crane.
- Train noise echo.
- Impact on nesting birds, in particular kingfishers.

#### Transport/train station matters

- Platforms not enlarged and limited/minimal station improvements and ticket office and number of doors do not reflect an improvement to the station.
- Unrealistic parking provision and adverse impact on surrounding streets.
- Traffic congestion.
- Nothing wrong with the existing station and only a minimal amount of work required to bring it into a suitable state.
- Proximity of the station does not mitigate against car ownership.
- Concerns that the restriction of parking permits through a S106 may be modified or removed by the Council.
- 25% improvement in queuing space unacceptable given the increase in population and rail traffic, does not deal with the handling of 80 000 rugby fans and appears to have reduced the amount of space available for crowds and perpetuates the channelling of match day crowds up Whitton Road.
- Potential holding areas for crowds lost due to the high density residential development.
- Amount of cycle spaces discriminates against those unable or unwilling to cycle.
- Does not enhance accessibility and does not provide adequate disabled access or for those with buggies.
- No indication that the trains will be able to accommodate the additional residents from the development.
- No pedestrian link to the rugby ground as referred to in the UDP.
- Transport interchange is a revamp of the current inadequate system.
- Escalators and more exits for event traffic needed.
- No mention of rerouting the rail tracks to avoid the current illogical and inconvenient platform arrangement and that the development prejudices the future expansion of the station with more lines.
- Riverside walk an empty public relations gesture, not necessary, unattractive and damaging to the river and will lead to vandalism, increased litter, danger to women, a 'no go' area, increased noise and burglaries.
- The Rugby World Cup in 2015 should not be a planning consideration.

#### Housing/density

- No key worker or affordable housing.
- S106 money should not be seen as a substitute for affordable housing.
- 4 bedroom houses needed, not starter flats.
- Too many small flats to be used as rental/low income properties and will not encourage 'young blood' to settle in the area and add to the community.
- Overpopulation and crowding leading to 'slums'.
- Lacks open space and play spaces for children.
- Poor standard of accommodation and lack of sunlight to some flats.

#### General concerns/other matters

- Scant regard to previous objections raised on the initial scheme.
- Limited time of the rugby world cup compared with irreversible damage of the scheme.
- Only improvements required are for improved access, more ticket machines, improved toilet facilities and better access to platforms on event days.
- Limited details on construction.
- Flawed community consultation procedure and misleading information.
- River walk misleading presented as it will be in shade for the majority of the day.
- No Council perusal of alternative funding as suggested by Vince Cable or funding by the RFU as a beneficiary and Plan B development should be considered.
- Station improvements (£2m) is small compared to £40m development investment.
- Investment of station improvements should come out of Network Rail budgets.
- Setting a precedent for similar development on the post office sorting site.
- Only providing an absolute minimum in sustainability.
- No proper attempt to look at alternatives.
- Financial contribution towards education vague and wont contribute to new classrooms and teachers
- No public space in front of the station.
- The visualisations and elevations under represent the mass of the development.
- Increased anti social behaviour under the bridge and around the Mary's Terrace stairwell.
- Archaeology concerns – missed opportunities to excavate the site.

#### Land use proposals

- No need for more restaurants/food outlets or justification behind this.
- No demand for flats or commercial development.
- More importance attached to the housing, plaza and shops than the station improvements.
- Impact on retail core of Twickenham and not in keeping with the rejuvenation of the centre.
- Provision of nursery and primary school on site required.
- Public leisure facilities required.

#### Non planning matters

- Should be smaller to minimise construction disturbance.
- Developer greed.
- Retail competition.
- Financial incentive for the council.
- Concerns with Solum's development in Epsom replicated.
- Process objections – the Council's planning web page has a default setting on the comments section set as 'support'.

**A standard letter received with 849 signatures objecting on the following grounds:**

- Too tall and creation of an oppressive wall of development.
- Poor quality design not befitting this site.
- Amount of development not required where the station improvements cost £2m compared to the deck which costs £3m.
- Contrary to SPD for the site and being pushed through despite this.

It should be noted that many of the signatories have also made representations, as reported above.

**Letters received from 12 households with the following general observations:**

Transport/station

- Questions regarding capacity of trains with the increased population above the station.
- Support for improvements to the station.
- Lack of parking (car and cycle).
- Concern regarding the management of increased traffic flow from residents and guests of the adjacent hotel.
- No account for future planning and space for difference transport such as trams, more cycle spaces etc.

Environment

- Questions regarding provision of school places.
- Questions regarding provision of health care for the additional population.

Land Use

- Regretful that affordable housing has been removed.

Design/mass/scale

- Objection to the height and proximity to the pavement.
- Lack of comprehensive development with the Royal Mail site.
- A *contemporary* piece of architecture commensurate with the site and surroundings would be welcome although it is too high.
- Massing should step back in tiers from London Road.
- Proposal illustrated on the Save Our Skyline flyer appears inappropriate to the site.

General matters

- Contradiction between the Core Strategy and Twickenham Station and surroundings SPD.
- Does not meet the Council's planning guidelines.
- Unfortunate that this scheme does not provide basic station facilities such as toilets, escalators, and disabled facilities in light of the impending world cup.

Non planning matters:

- Questions regarding the restriction on buy to let investors.
- Procedural matters (the consideration of representations prior to consultation, the website indicates a delegated decision would be made and the consultation dates and the likely decision date do not tally).

### **A petition with 3381 signatures received**

The petition states that the following would be supported on the Twickenham Station and Post Office Site:

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

And the following objected to:

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

The petition allows for a rating of uses deemed important. In many cases this has not been filled in but where it has the common uses that have been ticked are 'new school', 'river walkway linking the station to Richmond College and the stadium'.

### **Late letters received**

#### **Twickenham Residents Action Group (TRAG)**

TRAG has 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.

At the time of writing no detailed cost information has been submitted to verify if this alternative proposal is viable.

TRAG's alternative proposal comprises:

- A station building in Art Deco form that stretches across the site with a public plaza (1960sqm) fronting London Road.
- 30 residential units within a 3-4 storey high building fronting the River Crane and above the station building.
- A mix of small retail units (ranging from 13-167sqm).
- Seven B1 business units totalling 378sqm.
- Twenty car parking spaces for residents.

- 48 car parking spaces for the station.
- 340 cycle spaces.
- Kiss and ride drop off point.
- Match day access via the underpass onto platform 2.
- River Crane walkway.

A draft construction method statement *also accompanies the submission.*

TRAG have also submitted the following:

- 550 response cards supporting TRAG's alternative proposal for the development of Twickenham Station.
- 61 e-mail responses supporting the alternative proposal and objecting to the Solum proposal.

**Windsor Lines Passenger Association have submitted the following comments:**

Redevelopment of Twickenham Station is strongly supported and should secure:

- The entire redesign of the station.
- Modern replacements for the footbridges, stairs and platform architecture.
- Full accessibility to the platforms.
- Retail units at platform level.
- Undercover drop off for bus and taxis in both directions.
- A drop off point at ticket office level.
- Design is capable of dealing with large crowds.

The final plan must not hinder the reinstatement of four running tracks and urge the Council to take note of the TRAG scheme in light of the transport hub proposed.

**The Teddington Society**

Concern about the adequacy of investment levels for the station and supports the Windsor Lines Passenger Association's policies 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
- Plan for direct rail or underground links to Heathrow
- Extra loopline services
- A replacement for the failed Crossrail plans for a Norbiton to Stratford service
- A bus/rail interchange at the station for all bus routes passing through Twickenham.
- 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.

**Additional residents' representations**

One 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.

One 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.

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

97 letters received objecting on the following grounds:

- Too tall creating an oppressive wall of development.
- Poor quality design.
- The amount of development proposed is not required to improve the station.
- Contrary to the Council's own SPD.