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Development & Environment Directorate

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Our ref: PDU/3122/GC/02
Your ref: 12/3650/FUL
Date: 21 March 2013

Robert Angus

Richmond upon Thames Council
Civic Centre
44 York Street
Twickenham
TW1 3BZ

For the attention of Cathy Molloy (case officer)

Dear Mr Angus,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
Twickenham sorting office site, Twickenham Town Centre, TW1 1EE
Local Planning Authority reference: 12/3650/FUL**

I refer to the copy of the above planning application, which was received complete on 18 February 2013. On 21 March 2013 Sir Edward Lister, Deputy Mayor and Chief of Staff, acting under delegated authority, considered a report on this proposal, reference PDU/3122/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not comply with the London Plan for the reasons set out in paragraph 65 of the above-mentioned report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.

If your Council subsequently resolves to grant permission on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, a statement of any conditions the authority proposes to impose and (if applicable) a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

If your Council resolves to refuse permission it need not consult the Mayor again (pursuant to Article 5(2) of the Order), and your Council may therefore proceed to determine the application without further reference to the GLA. However, you should still send a copy of the decision notice to the Mayor, pursuant to Article 5 (3) of the Order.

Please note that the Transport for London case officer for this application is Andrew Dorrian, email AndrewDorrian@tfl.gov.uk, telephone 020 3054 7045.

Yours sincerely,



Colin Wilson

Senior Manager– Planning Decisions

cc Tony Arbour, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
Simon Lewis, St. James Group Ltd., Berkeley House, 19 Portsmouth Road, Cobham, Surrey
KT11 1JG

21 March 2013

Twickenham sorting office site, Twickenham town centre

in the London Borough of Richmond upon Thames

planning application no. 12/3650/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

Comprehensive redevelopment of the site to provide seven blocks of between two to five-storeys, to accommodate 110 homes, two restaurants units, a community building, new public open space, basement parking, landscaping and public realm works.

The applicant

The applicant is **St. James Group Ltd.**, and the architect is **John Thompson and Partners**.

Strategic issues

Whilst the residential-led mixed use redevelopment of this site is supported in principle, the proposed development configuration includes development on **Metropolitan Open Land**.

Other strategic issues are identified with respect to **social infrastructure, housing, urban design, inclusive access, sustainable development** and **transport**.

Recommendation

That Richmond Council be advised that the application does not comply with the London Plan for the reasons set out in paragraph 65 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

Context

1 On 7 February 2013 the Mayor of London received notice from Richmond Council of a planning application of potential strategic importance to develop the above site for the above uses. On 18 February 2013 the associated application documentation was provided to the GLA. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 31 March 2013 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 3D 1.(a)(b) of the Schedule to the Order 2008: *“Development on land allocated as Green Belt or Metropolitan Open Land in the development plan...; and which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.”*

3 Once Richmond 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 or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

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

Site description

5 The site comprises 1.15 hectares and is situated at the northern end of the town centre, directly opposite Twickenham rail station, on the west side of London Road. The northern edge of the site is bounded by the River Crane and Metropolitan Open Land (including a hardsurfaced area providing various sports pitches associated with a youth facility at Heatham House [on the opposite bank of the River Crane]). Wooded Metropolitan Open Land wraps round the western extent of the site, whilst the southern boundary is defined by four railway cottages, a large railway shed, and the mainline railway line to London Waterloo, beyond.

6 The site is currently occupied by a range of warehouse buildings (providing approximately 5,000 sq.m. of floorspace). The buildings were purpose built for use as a delivery and sorting office, but are currently occupied by a biodiesel distributor, providing approximately five full-time jobs at the site.

7 The red line boundary overlaps an area of Metropolitan Open Land at the north-western extent of the site (which is currently occupied by car parking and hardstanding), and the site is surrounded to the north, west and south by an area of designated importance for nature conservation. The site does not lie within a Conservation Area or contain any Listed Buildings. However, there are various heritage assets in the vicinity of the site, including the Grade II listed Heatham House (north of the site), Amyand Park Road Conservation Area (to the east) and Queen’s Road (Twickenham) Conservation Area (to the south).

8 The site is approximately 500 metres from the nearest section of the Transport for London Road Network (at Chertsey Road, to the north), whilst King Street (500 metres to the south) forms part of the Strategic Road Network. Seven bus routes operate within 500 metres of the site, including routes 267 and 281, which serve London Road and provide links between Hampton Court and Hammersmith, and, Surbiton and Hounslow, respectively. Overall the site has a good level of public transport accessibility, registering a score ranging between three and five, on a scale where six represents the most accessible locations in London.

Details of the proposal

9 The proposal is to demolish the existing sorting office buildings and redevelop the site to provide a 1,265 sq.m. community building (of between two and five storeys) and a residential-led mixed use block providing 592 sq.m. of restaurant uses and 82 flats (in a building of between three and five storeys), both fronting London Road. A new public space is proposed at the northernmost part of the site, fronting the River Crane, and adjacent to London Road. Behind the London Road blocks the applicant proposes 28 houses laid out within five, north-south aligned, terraces.

Case history

10 There is no relevant strategic case history associated with this application.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Metropolitan Open Land *London Plan;*
- Employment *London Plan;*
- Housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Providing for Children and Young People's Play and Informal Recreation SPG;*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy;*
- Density *London Plan; Housing SPG;*
- Urban design *London Plan;*
- Historic environment *London Plan;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM);*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Biodiversity *London Plan; the Mayor's Biodiversity Strategy; Tree and Woodland Strategies;*
- Blue Ribbon Network *London Plan;*
- Transport and parking *London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; and, Mayoral Community Infrastructure Levy.*

12 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 Core Strategy; the 2011 Richmond Development Management Plan; the 2005 Richmond Unitary Development Plan (saved policies); and, the 2011 London Plan.

13 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework;
- The Revised Early Minor Alteration to the London Plan;
- The Twickenham Area Action Plan (submission stage); and
- The Twickenham station and surroundings SPD (2010).

Principle of development

14 The Twickenham sorting office site is identified as a development site by the saved policies of the 2005 Richmond Unitary Development Plan (UDP), which promotes a balance of public service/mixed use redevelopment at the site, capitalising on the good level of public transport accessibility, and seeking to maximise benefits for the town centre. More recent emerging local policy within the submission stage Twickenham Area Action Plan (AAP) promotes redevelopment of this site to provide a mix of uses including: employment; residential; leisure; a substantial level

of community use. The AAP also states that *“There may be some scope for flexibility in the MOL [Metropolitan Open Land] boundary to achieve the objectives for the site provided that there are demonstrable benefits, which could include provision of a compensatory protected open area, and no adverse impacts on the quality and function of the MOL in this location.”*

15 Having regard to the above adopted and emerging policy context, officers are broadly supportive of the submitted proposal for residential-led mixed use redevelopment of this site, in strategic planning terms. As discussed in paragraph seven above, the red line boundary overlaps an area designated as Metropolitan Open Land by the adopted UDP and London Plan Policy 7.7 gives MOL the same level of protection as Greenbelt. However the boroughs most recent draft policy statement indicates some scope for flexibility subject to certain caveats and these are considered in further detail below.

Metropolitan Open Land

16 As discussed in paragraph fifteen, the application includes development on Metropolitan Open Land (MOL). London Plan Policy 7.17 affords MOL the same level of protection as Green Belt, and states that inappropriate development should be refused, except in very special circumstances. The reference to ‘inappropriate development’ flows from national guidance, and is defined within the National Planning Policy Framework (NPPF).

17 The planning statement submitted in support of the application suggests that the proposed development may be treated as infill of a previously developed MOL site, and may not, therefore, constitute inappropriate development. The NPPF defines this form of exception thus: *“limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.”*

The built development at the sorting office site does not lie within the MOL designation. However a portion of the site currently occupied by a hard surfaced car park which, the applicant states, has been in place for more than thirty years is within MOL. Based on the submitted plans the scheme would construct six, three to three-and-a-half-storey houses on this land. Whilst this development would have a greater impact on openness than the existing surface car park, the existing car park contributes little to the quality of the local environment or the River Crain corridor and is not functionally linked to that corridor.

18 In these terms, the form of flexibility recommended within the emerging Twickenham AAP (with respect to the MOL boundary at this site) appears to represent the most pragmatic way forward.

19 On this basis GLA officers are willing to balance the development on MOL against the response to emerging AAP policy, which seeks demonstrable benefits to outweigh any loss, and the avoidance of any adverse impacts on the quality and function of the MOL. The applicant should, therefore, present a case accordingly. In preparing a response, the applicant should also seek to address the issues raised in paragraphs 38 and 50 of this report, with respect to the visual permeability of MOL boundary treatments, and living roofs, respectively. GLA officers will provide a full and balanced assessment of the scheme against London Plan Policy 7.17 at the Mayor’s decision making stage.

Employment

20 As discussed in paragraph six above, the site is occupied by approximately 5,000 sq.m. of storage/distribution employment floorspace, and currently provides approximately five jobs. Whilst this workspace is not allocated as employment land through designation within the development plan, it is afforded a degree of protection by virtue of the existing employment use. It is also noted that emerging guidance within the submission stage Twickenham AAP seeks a proportion of employment uses for this site.

21 The applicant has not proposed any business (B Class) uses within the scheme, citing concerns with respect to market demand, and long-term commercial viability, within its rationale for discounting these. Instead, the applicant has allocated space for two restaurant units, which are expected to generate 33 jobs. The applicant also states that it expects the proposed community building to provide a further fifteen jobs, creating fifty new jobs in total (representing an uplift of 45 jobs at the site).

22 Whilst it is acknowledged that the nature of the employment proposed within the scheme would represent a shift away from the role of this site as a 'B Class' business location, this does not raise a strategic concern with respect to London Plan Policy 4.4. Nevertheless, the applicant is strongly encouraged to maintain an open dialogue with the existing business that operates at the site, and to take all reasonable steps to facilitate its successful relocation.

Social infrastructure

23 As discussed in paragraph nine the applicant proposes to provide a community building of between two and five-storeys, fronting London Road. The building will comprise 1,265 sq.m. of flexible community floorspace, to include a community hall/auditorium (to seat between 350 to 400 people), and a cafe/bar with an outdoor terrace at the ground floor. The upper floors will comprise various flexible areas capable of use for a range of purposes, including art and music studios, rehearsal space, teaching, meeting rooms and conferencing space.

24 The proposed community provision is strongly supported in line with London Plan Policy 3.16, and the emerging aspirations of the Twickenham AAP. Nevertheless, GLA officers would welcome clarification of the terms under which this provision is proposed to be made, for example, whether the building is to be delivered fully fitted (or simply as a shell and core), and whether it will be transferred free of charge to the Council, or subject to rental.

Housing

25 The proposal includes the provision of 82 flats and 28 houses, providing a total of 110 residential units. The table below sets out the proposed residential schedule.

Unit type	Intermediate affordable	Private market	Total
One-bedroom	10	12	22
Two-bedroom	1	59	60
Three-bedroom	0	6	6
Four-bedroom	0	22	22
Total	11	99	110

Affordable housing

26 Based on the above housing schedule the applicant is proposing a 10% provision of affordable housing. GLA officers acknowledge that the level of affordable housing will need to be balanced against the cost of providing of the community facility. Nevertheless, to support the

proposed level of provision, and in response to the requirements of London Plan Policy 3.12 (which seeks to secure the maximum reasonable amount of affordable housing), the applicant has submitted an affordable housing viability report. The viability report, and the financial modelling which underpins it, is currently undergoing a locally-led assessment to verify whether the proposed affordable housing provision would be the maximum reasonable. GLA officers will update the Mayor of the findings of the assessment, and of any further negotiations, at the decision making stage.

27 Irrespective of the findings of the viability assessment, GLA officers would support the inclusion of a financial review mechanism within the section 106 legal agreement, in order to reappraise the scheme at a suitable point, and capture any additional financial surplus generated by an uplift in private residential sales values. Such a mechanism would need to be designed so as to ensure an appropriate proportion of any financial surplus would be awarded to the Council, and ring-fenced for the delivery of additional affordable housing units.

Tenure

28 The proposed affordable housing provision is 100% intermediate. Whilst it is acknowledged that the residential offer within this scheme is comparatively small in strategic planning terms, GLA officers are of the view that it should still be capable of providing a balance of intermediate and affordable rent products. The applicant is, therefore, advised to have regard to the comments made below with respect to the need to prioritise affordable family housing, and to seek to provide a balance of affordable tenure on site, in accordance with the strategic aims of London Plan policies 3.9 and 3.11.

Mix of units

29 Based on the residential mix presented in support of paragraph 26 above, the scheme would deliver a good range of unit types, and achieves a 25% provision of family housing overall. However, no affordable family housing is proposed within the mix. This is disappointing. In line with London Plan Policy 3.11 (which identifies affordable family housing as a strategic priority for the capital) the applicant is strongly encouraged to provide some of the proposed house typologies as three and/or four-bedroom affordable rented units.

Residential standards

30 The applicant has stated that all dwellings will meet or exceed the minimum space standards within London Plan Table 3.3, and the submitted information supports this. Based on detail within the design and access statement and supporting plans, officers are also content that that unit layouts and other facets of residential design will be delivered in broad accordance with guidance in the Housing SPG (2012) and the best practice principles of the London Housing Design Guide (2010). Residential standards within the proposal are, therefore, broadly supported in line with London Plan Policy 3.5.

Children's play space

31 Based on the residential mix presented above, and the methodology within the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012), GLA officers have calculated an expected child population of 33 for the development. Based on this, the Mayor's SPG indicates that the development would need to make provision for 333 sq.m. of children's play and informal recreation space.

32 Officers note that the house typologies would benefit from private gardens, and that a private communal garden courtyard is proposed for the London Road mixed use block, as well as a

new public open space at the Crane riverside, which the applicant intends to furnish with informal play features to benefit young children. Officers also acknowledge that the nearby Craneford Way Playing Fields East provides more than two hectares of public open space, including sports pitches and formal play equipment, offering a range of formal and informal recreation opportunities for the older children expected within the development.

33 Based on the drawings and layouts provided GLA officers anticipate that the scheme could meet and exceed the on-site play requirements generated by the SPG in area terms. However, in the absence of specific figures within the submission documents, the applicant is requested to confirm this accordingly. Furthermore, to ensure accordance with London Plan Policy 3.6, the Council is encouraged to secure detailed approval of the proposed multi-functional landscaping and play features by way of planning condition. The Council may also wish to seek a financial contribution towards maintaining Craneford Way Playing Fields (or other local play/recreation provision) in order to mitigate the intensified use of these facilities as a result of the development.

Density

34 The site is located in at the edge of Twickenham town centre, within the predominantly urban setting of London Road. However, this character changes to the west and north of the site, where the setting is largely influenced by Metropolitan Open Land and suburban residential development beyond. Given the characteristics of the site, the London Plan density matrix (Table 3.2 in support of London Plan Policy 3.4) would suggest a residential density in the region of 200 to 700 habitable rooms per hectare.

35 In response to the site's characteristics the scheme has been designed to provide the higher density flatted development at the London Road street frontage, and lower density house typologies towards the west of the site. This approach is supported, and the planning statement submitted in support of the application indicates that the overall density of the scheme, based on net residential area, is 400 habitable rooms per hectare. This falls comfortably within the range identified by the London Plan and is supported in accordance with Policy 3.4.

Urban design

36 With the exception of the concern raised with respect to the proposed buildings on Metropolitan Open Land (refer above), officers are of the view that the overall layout and massing of the masterplan generally responds well to the challenges and opportunities presented by this site, and the design is broadly supported in strategic planning terms.

Layout

37 The north-south alignment of blocks, perpendicular to the internal access road, will allow for good visual permeability through the Metropolitan Open Land (MOL), and is supported. This arrangement also creates good quality residential mews courts, which will be well overlooked and activated by the surrounding buildings. However, officers are concerned that the proposed three metre high boundary treatment at the end of each of the mews will undermine the desired north-south visual permeability, and could also be detrimental to the quality of the MOL. Accordingly, the applicant is strongly encouraged to ensure the treatment of this boundary allows good visual permeability between the residential courts and the MOL.

Masterplan blocks

38 The applicant is advised that care will need to be given to the treatment of the gable ends of the residential terraces. This applies equally for the MOL, and street side, of the terraces, as

both of these areas rely on good levels of overlooking and pedestrian activity to ensure that they feel safe and well used. In these terms officers strongly support the proposed location of front entrances onto the main access route (rather than the mews) for houses at the southern end of the terraces. With respect to the northern end of the terraces, the applicant is encouraged to incorporate windows overlooking the MOL, in order to improve levels of passive surveillance on to this space, and to make the most of this visual amenity.

39 The community building has been designed as a standalone structure, with a triangular hall/auditorium on the ground floor. This provides a building of distinctive character, but results in a large amount of inactive frontage around the auditorium. Whilst the proposed cafe on the south side, and main entrance on the north side, does mitigate this to an extent, the applicant is encouraged to consider making the acute angle of the building more visually permeable (possibly through the use of semi-transparent glass blocks/panels). Consideration should also be given to ensuring that the external cafe patio has a strong visual relationship to the route leading to the London Road underpass.

40 The proposed mixed use London Road block is well laid out around a semi-public courtyard space. The restaurant provision within this block will bring welcome activation to the adjoining riverside public space, and collectively this arrangement will represent a substantial enhancement for the northern end of the town centre. The residential quality of this block is broadly supported. However, the applicant is encouraged to provide entrances to the ground floor units on the southern edge of the block, directly from the access route. This will improve the quality of this street, and ensure a good distribution of activity along it in accordance with London Plan Policy 7.3. This will also help mitigate the issues associated with the community hall frontage, as discussed above.

Historic environment

41 As discussed in paragraph seven above, the site is surrounded by a number of heritage assets, including a Listed Building and two Conservation Areas. Based on the information available, GLA officers are of the view that the development would not harm the setting of the neighbouring Listed Building, or adversely affect the character of the adjacent Conservation Areas.

Inclusive access

42 The planning statement includes the applicant's stated commitment to ensure that 100% of the proposed dwellings would meet the Lifetime Homes standard, and that a 10% provision of wheelchair accessible/adaptable dwellings would be provided across the scheme. This is supported in principle, however, whilst the design and access statement indicates that nine wheelchair accessible flats would be provided within the mixed use London Road block (representing 8% of the overall dwellings), it is not clear where the additional two wheelchair adaptable units are to be located. In line with London Plan Policy 3.8, the applicant is encouraged to identify two of the houses as capable of wheelchair adaptation, in order to meet the strategic target, and to offer a good balance for adaptable provision across the proposed residential typologies.

43 The proposed provision of a community building at London Road is strongly supported, and has the potential to become a valuable asset to the scheme, and the town centre. When resolving the detailed design of the internal spaces the applicant is reminded to have regard to the need to provide wheelchair spaces amongst seating within the proposed community auditorium. The proposed provision of a wheelchair accessible toilet within the reception area of the community building is strongly supported, however, the applicant is encouraged to ensure that this would be designed to be a 'Changing Places' toilet, to ensure that these facilities are as inclusive as possible.

44 Based on the information provided officers note that the development would allow at-grade access to dwellings, the new northern public space, and the main entrance of the proposed community building. This is supported, however, in order to maximise the benefit of these assets to the community it is important that the detailed resolution of the associated landscaping is underpinned by the principles of inclusive design. To this end, officers would welcome the submission of an inclusive access strategy within the overall landscaping scheme for the development, to be approved by the Council, and secured by way of planning condition.

45 It is further noted that the scheme will incorporate shared surface access. Whilst this feature can help to reduce traffic speeds and promote pedestrian priority, such areas must be designed carefully to ensure that they would not pose unnecessary challenges for visually impaired people. The applicant should, therefore, ensure that the landscaping strategy will promote a clear demarcation between the carriageway and footway in shared surface areas, and that a 'safe zone' will be created for pedestrians to use and access the site entrances and properties.

46 It is noted that house typologies will have two dedicated car parking spaces each. However, whilst the scheme would provide seven Blue Badge parking spaces within the basement allocation for the mixed use London Road block (10% of the associated provision), given the ability of this block to provide up to nine wheelchair accessible dwellings, and in accordance with the principles of London Plan policies 6.13 and 7.2, officers would welcome the development of a parking strategy within the travel plan to respond to any increased need for Blue Badge parking provision in future. Such a strategy should be secured by way of planning condition/planning obligation as appropriate. The applicant is also advised that disabled parking spaces should be located as close as possible to building entrances and lift cores, and that the detailed design of the disabled parking spaces should accord with the Department for Transport's 'Inclusive Mobility' guidance.

Sustainable development

Energy strategy

47 In line with London Plan Policy 5.2, the applicant has submitted an energy strategy for the development, setting out how the scheme will reduce carbon dioxide emissions in accordance with the London Plan energy hierarchy. The components of the energy strategy are supported, and overall the proposal is expected to deliver a reduction of 59 tonnes of carbon dioxide per year in regulated emissions, compared to a 2010 Building Regulations compliant development. This is equivalent to an overall saving of 35%, which would exceed the current (2010-2013) target within London Plan Policy 5.2. The Council is strongly encouraged to secure accordance with the proposed energy strategy by way of planning condition.

Climate change adaptation (including Blue Ribbon Network and biodiversity)

48 The applicant has set out the proposed climate change adaptation measures within the sustainability statement and environmental statement. These documents confirm that the proposed development is situated within Environment Agency flood zone one, and therefore has a low probability of flooding. The flood risk assessment confirms that the applicant is proposing to incorporate sustainable urban drainage systems (SUDS) to reduce surface water discharge rates into the River Crane by 50%. This is supported in line with London Plan Policy 5.13, and the Council should secure detailed approval of the associated SUDS infrastructure by way of planning condition.

49 As currently proposed, the scheme does not make provision for green roofs. In line with London Plan policies 5.10, 5.11 and 7.19 the applicant is strongly encouraged to make provision

for living roofs on top of the London Road mixed use block, in order to contribute towards urban greening, and offer biodiversity enhancements for the site.

Transport

Impact on the transport network

50 Transport for London (TfL) has assessed the expected trip generation figures and impact assessments associated with the proposed development, and is satisfied that the scheme would have an acceptable impact on local public transport, and the strategic highway network.

Car parking

51 The scheme proposes 127 car parking spaces in total, including visitor parking. The transport statement identifies that 68 unallocated spaces will be provided for the mixed use London Road block, within a basement car park. This results in a parking ratio of 0.8 spaces per unit for the apartments (with 10% allocated as Blue Badge provision). The remaining spaces will be allocated for the 28 houses (two spaces each), and visitors (three spaces). TfL is of the view that the level of car parking associated with the houses is excessive, and the applicant is encouraged to make a reduction in recognition of the site's good public transport accessibility. When considering the balance of car parking provision the applicant should also have regard to the comments in paragraph 47 above, with respect to Blue Badge parking.

52 The applicant's commitment to provide active and passive provision for electric vehicle charging points in line with strategic standards is supported in line with London Plan Policy 6.13. The Council is encouraged to secure and monitor this provision through the travel plan, with a threshold point established to trigger the conversion of passive provision to active charging spaces, when demand dictates.

Cycling

53 The application proposes 208 cycle parking spaces. 142 of these are located in the basement of the London Road mixed use block, with a further 56 spaces provided for the houses. The remainder (ten spaces) are allocated for the retail and community building. Whilst TfL is content that the residential cycle parking allocation is in line with London Plan standards, clarification is sought with respect to the level attributed to the community building. Given the flexible nature of its proposed use, TfL is keen to ensure that an appropriate level of visitor cycle parking would be provided in accordance with the strategic aims of London Plan Policy 6.9. To this end TfL would welcome further discussion with the applicant and Council on this matter.

Walking

54 Offices support the proposed connection to a the east-west pedestrian link under London Road in line with London Plan Policy 6.10. In addition, and in accordance with emerging aspirations within the submission stage Twickenham AAP, it is also noted that the scheme opens up a short section of the River Crane. This is welcomed, and will support the opportunity to achieve a continuous link from Twickenham station to the river, and onwards, towards Twickenham Stoop Stadium. It is, nevertheless, noted that the fruition of this link requires the acquisition of third party land. TfL encourages the Council to continue to promote this connection through ongoing discussions with the relevant land owners, in order to help relieve pedestrian congestion on matchdays. This route should also be designed for use by cyclists.

Travel planning

55 The submission of a framework travel plan within the transport statement is welcomed. TfL has assessed this plan using the ATTrBuTE assessment tool, and is broadly satisfied with the content of the document. Nevertheless, as discussed in paragraph 53 above, the monitoring of electric vehicle charging point usage should be incorporated within the travel plan. To ensure accordance with London Plan Policy 6.3, the travel plan should be secured, monitored, reviewed and enforced through the section 106 legal agreement.

Servicing and construction

56 The applicant's commitment to submit a delivery and servicing plan is supported. The plan should identify off-street servicing areas for the various uses within the scheme, and promote the optimised coordination of delivery timings. The applicant is also advised that the associated delivery and servicing principles should be incorporated within the travel plan, in accordance with TfL's guidance 'A New Way to Plan'.

57 The applicant is further advised that a construction logistics plan should be submitted and approved prior to commencement of the development. TfL requests that this includes phased drawings, showing: construction routes for plant and vehicles; traffic management layout and signs for the works; and, swept path analysis of access points to accommodate construction vehicles. The construction logistics plan should be secured by way of planning condition in line with London Plan Policy 6.14.

Community Infrastructure Levy

58 The Mayor has introduced a London-wide community infrastructure levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail.

59 The Mayor has arranged boroughs into three charging bands. The rate for Richmond upon Thames is £50 per square metre. The required CIL should be confirmed by the applicant and Council once the components of the development, or phase thereof, have themselves been finalised.

60 London borough councils are also able to introduce CIL charges which are payable in addition to the Mayor's CIL. Richmond Council has yet to adopt a scheme, but consulted on a preliminary draft charging schedule between December 2012 and January 2013. Further details are available on the Council's website.

Local planning authority's position

61 Richmond Council is expected to formally consider the application at a planning committee meeting in April 2013.

Legal considerations

62 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. 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

63 There are no financial considerations at this stage.

Conclusion

64 London Plan policies on Metropolitan Open Land, employment, social infrastructure, housing, urban design, inclusive access, sustainable development and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Metropolitan Open Land:** The proposed construction is on Metropolitan Open Land. In accordance with emerging site specific policy, the applicant should present a case demonstrating that the scheme would avoid adverse impacts on MOL, and deliver benefits that would clearly outweigh the associated loss.
- **Employment:** The proposed shift away from the role of this site as a 'B Class' business location does not raise a strategic concern with respect to London Plan Policy 4.4.
- **Social infrastructure:** The proposed community building is strongly supported in line with London Plan Policy 3.16, however, officers would welcome further clarification with respect to the terms under which this building will be provided.
- **Housing:** The viability of the scheme should be fully assessed at the local level to ensure that the maximum reasonable amount of affordable housing would be delivered. A financial review mechanism is also sought in accordance with the principles of London Plan Policy 3.12. In addition, the applicant is strongly encouraged to make provision for affordable family housing in line with London Plan Policy 3.11, and clarification of the proposed playspace provision, in area terms, is sought to ensure accordance with London Plan Policy 3.6.
- **Urban design:** Notwithstanding the concern with respect to inappropriate development on Metropolitan Open Land (MOL), the design of the scheme is broadly supported. However, the applicant is encouraged to ensure that boundary treatments would allow good visual permeability, and that frontages across the scheme are as open and active as possible in accordance with the principles of London Plan policies 7.1 and 7.3.
- **Inclusive access:** Whilst the overall response to access and inclusion is generally supported, the applicant should clearly demonstrate how the scheme would meet the 10% target for wheelchair accessible/adaptable homes in line with London Plan Policy 3.8. An inclusive access strategy for the landscaping scheme should also be secured by condition in accordance with London Plan Policy 7.2. Further discussion is also sought with respect to Blue Badge parking provision, in the context of managing potential future demand.
- **Sustainable development:** The proposed response to climate change mitigation and adaptation is broadly supported, however, the applicant is strongly encouraged to make provision for living roofs on top of the London Road mixed use block in line with London Plan policies 5.10, 5.11 and 7.19. Conditions are also sought to secure the energy strategy and sustainable urban drainage systems in accordance with London Plan policies 5.2 and 5.13.

- **Transport:** Whilst the proposal is broadly acceptable in strategic transport terms, further discussion, clarification and/or commitments are sought with respect to car parking; cycling; travel planning; and, servicing and construction to ensure accordance with London Plan policies 6.3, 6.9, 6.13 and 6.14.

65 On balance, the application does not yet comply with the London Plan.

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