

Planning Application Supporting Statement

on behalf of

Omaha Properties

for a

Class D2 and Residential Development

at

9 King Street, Twickenham, TW1 3SD

June 2013

Ref: 8255/54

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SECTION 1.0

INTRODUCTION

1.1 This planning application supporting statement forms part of a full planning application submission on behalf of Omaha Properties, the freeholders of the application site, no. 9 King Street, Twickenham, TW1 3SD for:

“Partial demolition of existing building and redevelopment/conversion on ground to third floor levels for a mixed use scheme comprising Class D2 Assembly and Leisure Use together with 2no. two bed flats and 2no. one bed flats.”

1.2 This document, in conjunction with the planning application forms and information on planning obligations should be read alongside the:

- Scheme drawings and Design and Access Statement prepared by Haskoll Architects;
- Transport Statement prepared by Cannon Consulting Engineers;
- Sustainability Reports of Silcock Dawson;
- Archaeological Assessment by Compass Archaeology.

1.3 The current proposals for the site follow a scheme submitted in late 2011 (11/3695/FUL) and a subsequent appeal which was dismissed in December 2012 (APP/L5810/A/12/2179082). This statement includes information on:

- The background to the application submission;
- Details of the proposals;
- The planning policy context;
- An appraisal of the proposals.

1.4 This statement concludes that the proposals are positively supported by all tiers of planning policy and should therefore receive planning permission.

SECTION 2.0

APPLICATION BACKGROUND

The Site

- 2.1 The application site extends to approximately 334 sqm. It has a small, narrow frontage to King Street which acts as a pedestrian access and which leads via a corridor link to a reception area and then a building at the rear – Queens Hall - (which has a smaller two storey extension on its southern end) and which fronts a service road which leads off Wharf Lane.
- 2.2 The site falls within Twickenham town centre with the main body of the site sitting behind, and not visible from, the commercial properties that front onto the south side of King Street between Water Lane and Wharf Lane. Its frontage to the service road has a separate pedestrian access but no vehicular access into the site itself. The site sits amongst the rear curtilages of the properties that front King Street and which contain an assortment of yards, parking areas and buildings. On the opposite side of the service road to the south of the application site is the Twickenham Riverside Site.

Planning History

- 2.3 The Council's online planning history records show a total of 13 applications relating to no 9 King Street although not all relate to the exact boundaries of the current application site. The most relevant applications are:
- **04/3420/FUL** Re-arrangement of existing leisure and retail units. Alterations to access to upper part of no. 9 King Street and conversion of the upper part of existing hall structure to form 6 flats including demolition and rebuilding of rear part of hall.

NON DETERMINATION APPEAL DISMISSED

PLANNING WORKS

- **05/2492/FUL** Rearrangement of leisure and retail floorspace, alterations to access to upper part of 9 King Street, conversion of upper part of existing hall structure to form 6 flats, including demolition and rebuilding of rear part of hall

REFUSED

- **06/0132/FUL** Rearrangement of uses on ground and first floors to provide class A1 retail unit and leisure facility, alterations to access to upper part of 9 King Street and the conversion of the upper part of the existing hall structure to form six flats, including demolition and rebuilding of the rear part of hall.

APPROVED

- **11/3695/FUL** Partial demolition of existing building and redevelopment/conversion at ground to fourth floor levels for a mixed use scheme with D2 Assemble and Leisure, 4no. two bed flats and 1no. one bed flat and alterations to access and the provision of 2no. car parking spaces.

REFUSED AND SUBSEQUENT APPEAL DISMISSED

The Applicants

2.4 Omaha Properties are the freehold owners of the application site and, in addition, own the land adjoining the application site to the north east and south west as shown on the application drawings.

2.5 The application proposals are designed not only to regenerate the existing building but also to act as a catalyst development not only for the applicant's surrounding land but also the wider area in general.

SECTION 3.0

PLANNING POLICY

National Policy

National Planning Policy Framework

- 3.1 The National Planning Policy Framework (NPPF) was published on the 27th March 2012 and sets out the Government's planning policies for England and how these are expected to be applied.
- 3.2 The NPPF is a material consideration in the determination of planning applications. The purpose of the planning system is to contribute to the achievement of sustainable development.
- 3.3 As part of this goal, the system has an economic, social and environmental role in supporting vibrant and healthy communities with accessible local services, enhancing and protecting the built and historic environment together with a role to improve people's quality of life by widening the choice of high quality homes.
- 3.4 At the heart of the NPPF is the presumption in favour of sustainable development. In terms of decision making this means approving developments that accord with the development plan without delay and where any such plan is out of date or silent, grant permission unless the adverse impacts would significantly and demonstrably outweigh the benefits.
- 3.5 In relation to the Core Planning Principles in the NPPF, planning should be about finding ways to enhance and improve the places in which people live their lives; meet the need for housing in an area; seek high quality design and reuse land that has been previously developed. Mixed use developments are also encouraged.
- 3.6 The NPPF also requires Local Planning Authorities to significantly boost the supply of housing and housing applications should be considered in the context of the presumption in favour of sustainable development. A wider choice of high quality homes should also be delivered as part of this process. New housing in town centres is also recognised as playing important role in the vitality of centres.

- 3.7 Good design in proposals should contribute positively to making places better for people while optimising the potential of a site to accommodate development. Schemes should respond to local character but not be overly conformist to local forms or styles. Permission should only be refused when opportunities for improving the character and quality of an area are not taken.
- 3.8 Finally, in relation to decision taking, Local Planning Authorities should approach this in a positive way

Regional Policy

The London Plan (July 2011)

- 3.9 This provides the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. It sets the strategic, London-wide policy context within which Boroughs should set their detailed local planning policies.
- 3.10 The most relevant policies and chapters from the plan are:
- 2.15 Town Centres;
 - 3.3 Increasing housing supply;
 - 3.4 Optimising housing potential;
 - 3.5 Quality and design of housing developments;
 - 4.6 Support for and enhancement of arts, culture, sport and entertainment;
 - The general themes of Chapter 5 London's response to climate change;
 - The general themes of Chapter 7 London's living places and spaces.

Local Policy

Local Development Framework Core Strategy (April 2009)

3.11 The Local Development Framework Core Strategy sets out the strategic planning framework for the Borough.

3.12 The document has three inter related themes/objectives and related to each are a number of spatial policies.

1. A Sustainable Future

Ensuring an appropriate location for land uses (taking into account the network of town centres);

Making the best use of land;

Reducing environmental impact (by reuse of existing buildings)

Locating development so as to reduce the need to travel

2. Protecting Local Character

New development to recognise local character and create places of high architectural and urban design quality

Recognise the role of town centres generally in providing a range of services and housing

In Twickenham Town Centre proposals should help revitalise the centre through redevelopment/refurbishment.

3. Meeting People's Needs

Provide new homes

Provide services and facilities for the community.

3.13 The individual key spatial policies are:

- CP1 Sustainable Development;
- CP2 Reducing Carbon Emissions;
- CP3 Climate Change - Adapting to the Effects;
- CP8 Town and Local Centres;
- CP9 Twickenham Town Centre;
- CP14 Housing;
- CP16 Local Services/Infrastructure.

Local Development Framework Development Management Plan (November 2011)

3.14 The Development Management Plan was adopted on the 1st November 2011. The Unitary Development Plan (March 2005) is now superseded with the exception of the site specific proposals and the policy on waste collection and disposal.

3.15 The policies in the plan are arranged into four broad groups

- For a Sustainable Future;
- Protecting Local Character;
- Meeting People's Needs;
- Detailed Generic Policies.

3.16 The key policies are:

SD 1 Sustainable Construction;
SD 2 Renewable Energy and Decentralised Energy Networks;
SD 4 Adapting to Higher Temperatures and Need for Cooling;
SD 7 Sustainable Drainage;
SD 9 Protecting Water Resources and Infrastructure;
SD 10 Water and Sewerage Provision;

TC 1 Larger Town Centres;
TC 5 The Evening Economy;

HD 1 Conservation Areas - designation, protection and enhancement;
HD 4 Archaeological Sites;

HO 4 Housing Mix and Standards;
HO 6 Delivering Affordable Housing;

SI 1 Encouraging New Social Infrastructure Provision;
SI 2 Loss of Existing Social Infrastructure Provision;

TP 2 Transport and New Development;
TP 3 Enhancing Transport Links;
TP 6 Walking and the Pedestrian Environment;
TP 7 Cycling;
TP 8 Off Street Parking - Retention and New Provision;

DC 1 Design Quality;
DC 2 Layout and Design of Mixed Use Schemes;

DC 5 Neighbourliness, Sunlighting and Daylighting;
DC 6 Balconies and Upper Floor Terraces;
DC 9 Planning Application Checklist.

Supplementary Planning Documents and Guidance

3.17 There are also a series of Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPD) which have been produced by the Council. Since 2004, SPGs have been replaced with SPDs.

3.18 The most relevant documents are:

- Design Quality 2006;
- Residential Development Standards 2010;
- Small and Medium Housing Sites 2006;
- Sustainable Construction Checklist 2006;
- Affordable Housing March 2012 (draft)
- Planning Obligations 2005.

Twickenham Area Action Plan

3.19 The emerging Twickenham Area Action Plan (AAP) will form part of the Local Development Framework and will set out an overall strategy for the future of Twickenham town centre, covering the period up to 2027. The plan will cover the area within the town centre boundary as defined in the Development Management Plan. The scope of the action area plan will be:

- Use of land and buildings, including key sites;
- Use of parks and civic spaces;
- Transport and parking proposals and principles;
- Environmental improvement schemes – large scale and principles;
- Design Guidance – policies and principles.

- 3.20 The AAP is expected to be adopted by the Council on the 2nd July 2013. The application site is identified in the AAP as a building where reuse/redevelopment is encouraged.

SECTION 4.0

PLANNING CONSIDERATIONS

- 4.1 The context for the application proposals are principally provided by the appeal decision dated 27th December 2012 (APP/L5810/A/12/2179082) which related to application 11/3695/FUL.
- 4.2 The appeal decision considered the proposals within the framework of current planning policy and concluded that the living conditions for future occupiers were acceptable, that the proposed housing mix was appropriate and that the replacement D2 floorspace was also acceptable. Issues remained however with the effect of the proposals on the character and appearance of the surrounding area, highway/pedestrian safety and refuse, recycling and cycle storage provision.
- 4.3 The application proposals therefore address those areas where concern was previously raised while maintaining those elements which were supported. As a consequence the number of residential units now proposed is four and the amount of retained D2 floorspace has been increased.
- 4.4 **Character and Appearance:** Perhaps the key consideration in the appeal decision was the impact of the proposals on the character and appearance of the area. Queen's Hall was regarded as a distinctive and prominent building in the area.
- 4.5 In response to this the application proposals retains the original Queens Hall building with the replacement rear extension being of a subordinate scale with significant use made of glazing. The overall design is now simple and uncomplicated.
- 4.6 The palette of materials is now simplified and respectful of the context and includes a zinc roof to blend with the slate roofs nearby.
- 4.7 Significantly, there is no increase in height of the Queens Hall.

- 4.8 The Design and Access Statement contains further detail on the design evolution of the proposals which are now considered to accord with Core Strategy Policies CP7 and CP8 as well as Development Management Policies DM DC1, DC2, TC1, OS11 and HD1.
- 4.9 **Living Conditions:** The proposals now provide four flats on two upper floors – 2no. 2 beds and 2no. 1 beds.
- 4.10. The habitable living areas for each of the flats are located at the southern end of the building fronting Jubilee Gardens and the River Thames. Each of the flats have terraces on this elevation. The living areas have large windows which lead onto the terrace areas and combine to provide high quality space with an excellent outlook.
- 4.11 The rooms within each flat that may be regarded as having more of a restricted outlook are the bedrooms and bathrooms but all still have a window or rooflight.
- 4.12 Following a similar approach to the appeal proposals, all flats are regarded as providing acceptable living conditions that accord with DMP policies DM DC1 and DM HO4.
- 4.13 **Housing Mix:** The proposed mix of the 4 flats is 50% 1 beds and 50% 2 beds.
- 4.14 In common with the appeal proposals, the constraints of the site do not allow for the preferred mix of units to be provided. In acknowledging this position, the appeal Inspector understood the constraints and accepted that it was not possible to provide more one bed units without resulting in poor quality living conditions.
- 4.15 Identical issues remain with the application proposals. Appendix D of the Design and Access Statement demonstrates the difficulties in providing more 1 bed flats and the impact that would have on living conditions, external amenity space and additionally the elevational treatment of Queens Hall itself.
- 4.16 In common with the appeal scheme, which the Inspector found acceptable, the proposals accord with policy DM HO4.
- 4.17 **Replacement D2 Space:** The application proposals include an additional 44sqm of D2 floorspace over that proposed in the appeal scheme.

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- 4.18 The proposed D2 floorspace will be split over two floors. A reception area and changing rooms/toilet facilities on the ground floor with the main D2 exercise/leisure space on the first floor.
- 4.19 The D2 space is in a different format to that currently provided on the site but would be, in common with the appeal scheme, inclusive and accessible to all members of the community.
- 4.20 The proposals do not therefore conflict with CS policies CP16 or CP17 as these policies do not seek to protect such uses for specific occupiers or sports. Instead they seek to retain community facilities and encourage and promote health and well being which is precisely what the application proposals do.
- 4.21 The proposals by retaining the D2 use would also accord with DMP policy DM SI2.
- 4.22 **Highway and Pedestrian Safety:** The proposals are now car free. The space previously occupied by the two off street car parking spaces is now utilised partly for the D2 reception area, refuse and recycling areas, cycle parking and an increased pavement width.
- 4.23 This removes the issues the appeal Inspector raised with parking manoeuvring and the general traffic movements associated with these two spaces which were seen as having the potential to undermine highway and pedestrian safety.
- 4.24 The Transport Statement submitted in support of the application concludes that the car free development will not have any unacceptable highway consequences or prejudice pedestrian safety. There is no conflict with DMP policies DM DC1 and DM TP8.
- 4.25 **Refuse, Recycling and Cycle Storage Provision:** The revised ground floor layout of the application proposals now fully addresses these issues.
- 4.26 Internally, each of the four flats are provided with a secure storage locker which is capable of accommodating two cycles each.
- 4.27 Externally, and directly adjacent the D2 reception area, four cycle stands are proposed and which are capable of accommodating eight cycles.

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- 4.28 Refuse and recycling storage areas are provided separately for the D2 use and the flats off the service road. The facilities for each use are in discreet, secure areas which are integrated into the building design so as to be as unobtrusive as possible. There is no conflict with DMP policy DM TP7.
- 4.29 **Sustainability:** Underpinning all aspects of the proposals including the design approach however has been the need to deliver a sustainable development.
- 4.30 The proposals primarily utilise an existing building but incorporate elements of demolition and new build to ensure the most efficient use of the existing fabric which includes the use of green roofs. The proposals achieve the BREEAM “Excellent” standard and Level 4 of the Code for Sustainable Homes to exceed the requirements of DM policy SD1.

SECTION 5.0

CONCLUSIONS

- 5.1 The context for the application proposals have essentially been driven by the December 2012 appeal decision.
- 5.2 The current application proposals build on those elements of the previous scheme that were deemed to be acceptable – living conditions, housing mix, replacement D2 floorpspace – and combine these within a new design to overcome issues with character and appearance, highway issues and refuse, recycling and cycle storage provision.
- 5.3 The proposals utilise an existing and inefficiently used single use building in a town centre location and through a combination of adaptation and new build provide a mixed use development that increases the flexibility of the existing D2 Assembly and Leisure space while providing 4 new residential units.
- 5.4 These proposals are supported in principle by a the National Planning Policy Framework which promotes a presumption in favour of “sustainable development”
- 5.5 Support for the proposals is also evident at the regional policy level through The London Plan, including the policies to regenerate town centres and increase the supply of housing.
- 5.6 At the local policy level through the Local Development Framework this support for the application proposals is also echoed and, indeed, positively promoted.
- 5.7 The themes/principles contained in the Core Strategy - a Sustainable Future, Protecting Local Character, Meeting People’s Needs - are all supportive of the application proposals. In particular the proposals:
- are in an appropriate location for the uses proposed (D2 and residential);
 - make the best use of land including the re-use of existing buildings;
 - create a high quality architectural development;
 - provide new homes, enhance the existing use and help regenerate the Town Centre.

5.8 At the most detailed policy level, the application proposals have regard to the four broad policy areas of the Development Management Plan:

- For a Sustainable Future;
- Protecting Local Character;
- Meeting People's Needs;
- Detailed Generic Policies.

5.9 The proposals are also demonstrably sustainable, exceeding the requirements of DM policy SD1.

5.10 The transport issues relating to the proposals have also been carefully assessed and these conclude that there are no transport related issues that would prevent the grant of planning permission

5.11 The range of uses proposed is positively supported in a town centre location. DM policy TC1 states:

“Proposals that contribute towards a suitable mix of uses will be approved, provided that they are appropriate to the function, character and scale of the centre. Acceptable town centre uses could include retail (if within or well related to designated frontages), business, leisure, tourism, community uses, health and residential development compatible with other development in the town centre”

5.12 The design and architectural quality of the proposals has evolved since the previous scheme and has been a key focus in the current application proposals. This is now a high quality scheme respectful of its context but also importantly, through this quality, is designed to be an asset to the immediate area, the town centre as a whole and should therefore be recognised as a proposal capable of acting as a catalyst, not least for the adjacent Twickenham Riverside Site.

5.13 This statement has identified and assessed the key planning issues in relation to the application proposals within the context of the previous appeal. This has demonstrated the benefits of the proposals and the support they receive from all tiers of planning policy. On this basis, it is considered that planning permission should be granted for the proposals.

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