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LONDON BOROUGH OF  
RICHMOND UPON THAMES

# AGENDA

For a meeting of the

## DEVELOPMENT CONTROL COMMITTEE

to be held on

**THURSDAY 28 FEBRUARY 2002**

at

**7:00 PM**

in the

**CLARENDON HALL, YORK HOUSE, TWICKENHAM**

Gillian Norton, Chief Executive

**Committee  
Members:**

Councillor B Miller (Chair), Councillor Elengorn (Vice-chair), Councillor Mann (Vice-chair), Councillor Weber (Vice-chair), Councillor Butler, Councillor Carthew, Councillor Flemington, Councillor Langford and Councillor Mollett.

**Committee  
Administrator:**

James Stanton ☎ 020 8891 7813 ✉ [j.stanton@richmond.gov.uk](mailto:j.stanton@richmond.gov.uk)

**1. MINUTES**

Minutes of the Development Control Committee meeting held 21 February 2002 *TO FOLLOW*

**2. DECLARATIONS OF INTEREST**

Members are asked to declare any interests in matters for consideration at the meeting.

**3. APPLICATIONS FOR DEVELOPMENT PERMISSION; LISTED BUILDING CONSENT; AND ENFORCEMENT OF PLANNING CONTROL**

Reports of the Development Control Manager attached.

The recommendations contained in the attached reports are those of the officers and are not binding upon the Committee. Members are asked to note that there will be an adjournment of the meeting for a period of approximately 10 minutes starting at a convenient time between 9.00 and 9.30pm.

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**PAGE NO.**

**WARD**

*Wards from May 2002  
in italics*

1	01/2584/FUL	FORMER SWIMMING BATHS, CAR PARK, 15 KING STREET AND WHARF LANE, THE EMBANKMENT, TWICKENHAM	Central Twickenham Twickenham Riverside
29	01/2583/CAC	FORMER SWIMMING BATHS SITE, THE EMBANKMENT, TWICKENHAM	Central Twickenham Twickenham Riverside

**PLEASE NOTE:**

1. The next scheduled meeting of the Development Control Committee will be held on **Thursday 14 March 2002** at 6.30pm.
2. In accordance with the Interim Code of Conduct on Declarations of Interest, Members are requested to declare any interests orally at the start of the meeting and again immediately before consideration of the matter. Members are reminded to specify the agenda item number to which it refers; whether it is pecuniary or non-pecuniary; and, if the latter, whether it is "clear and substantial".
3. Members are also reminded of the requirements of Section 106 of the Local Government Finance Act 1992 that they should declare and not vote on specified matters if they are two months or more in arrears with their Council Tax payments.
4. For those members of the public with hearing difficulties infra-red hearing systems have been fitted in the Council Chamber, Terrace Room, Salon and Room 7. Neck loops and headsets are available in the Reception Office.

York House  
Twickenham  
TW1 3AA

21 February 2002

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**DEVELOPMENT CONTROL COMMITTEE - 28 FEBRUARY 2002**

**01/2584/FUL  
FORMER SWIMMING BATHS, CAR PARK  
15 KING STREET AND WHARF LANE  
THE EMBANKMENT  
TWICKENHAM**

**CENTRAL TWICKENHAM WARD  
Contact Officer:  
E Langmaid x7395**



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**Proposal:** Demolition of existing building and construction of a new mixed use development including housing, A1/A3 uses, three screen cinema, health club and swimming pool, new public space and environmental improvements to the embankment, Wharf Lane and Water Lane. Demolition of the ground floor of No.15 King Street to create a new pedestrian link through to the river.

**Applicant:** MacCormac Jamieson Prichard for DDSF Limited

**Application received:** 28 September 2001

**Consultations:**

ADV, Site Notice

Flats 1-6 Eyot Lodge

1-33 (odd) 1A, 1B, 7A, 13A-33A (odd), 33B, 35-59 (odd) Flats A-B 35, Flats A-B 41 and 2-62 (even), Flats A-C 48, Flats 1-3 52, Flats A-B 16, Queens Hall King Street

37A, 39A, 45A-59A (odd) King Street Parade

Flats 1-2 Poulett Lodge

31, 32-37, 32A, upper flat 35, Flats A-C 36 Church Street

1-21(odd), 1A, Riverside Drop-In Centre Water Lane

Copper Beech, Kingslee, The Cottage, Desdemona, Wild Thyme, Wyndfall, Ripple, Mascot, Sunrise, The Nook, Boathouse, Woodford, The Moorings, Eel Pie Marine Centre, Eel Pie Island Slipways, Jacobs Ladder, Eel Pie Island Association, Hurley Cottage, The Chalet,

## DEVELOPMENT CONTROL COMMITTEE - 28 FEBRUARY 2002

Sans Souci, 1-3 River Court, Eel Pie Boatyard, Palm Beach, Twickenham Rowing Club, 8 and 9 Aquarius, Min Y Don, 3 River Court, River Studio Eel Pie island  
Works Premises adj The Moorings Eel Pie Island  
Help a Neighbour in Distress Scheme bath House  
Hobby Horse group for Children, 249 Lincoln Avenue  
8 Tudor Gardens  
34 Albion Road  
4 Campbell Close  
54 Park House Gardens  
16 Cole Road  
Flats 1-80, 28, 32, 34, Porters Lodge Thames Eyot  
Flat 19 31, 241 Waldegrave Road  
36 Gothic Road  
2-10,11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22, 23, 24 Bath House, D'aumale Cottages, The Embankment  
7 Strawberry Hill  
177 Richmond Road  
37 Walpole Road  
Richmond and Twickenham Green Party  
Friends of Twickenham Green  
5-19 (odd), 8-18 (even) Bell Lane  
Barclays Bank York Street  
1-8 Upper Premises, 2-62 Upper Premises London Road  
The Environment Trust  
Twickenham Society  
River Thames Society  
York House Society  
Strawberry Hill Residents' Association  
3 Denmark Road  
Cllr T Whittal  
21 Twining Avenue  
72 Bucklands Road  
72 Queens Road  
111 St Margarets Road  
7, 9, 14, 18, 19, 31, 50, 76 Poulett Gardens  
39 Ashburnum Road  
78 Third Cross Road  
25 Bonser Road  
4 Saville Road  
23 Langham Road  
64 Cambridge Road  
162 Lincoln Avenue  
50 Popes grove  
16, 50 and 54 Sherland Road  
71, 106 Church Road  
55 May Road  
42 Ormond Crescent  
54 Lion Road  
21 Water Lane  
11, 26, 28, Percy House, Lincoln House Montpelier Row  
Eyot Lodge Residents Association  
1 Walpole Road  
Thames Eyot Residents' Association  
27, 72 Queens Road

**DEVELOPMENT CONTROL COMMITTEE - 28 FEBRUARY 2002**

12 Gothic Road  
Riverside House, Thames House Aubrey House Riverside  
16 Fulwell Park Gardens  
34 Sion Court  
18 Heathfield South  
12 Second Cross Road  
12 Trowlock Island  
62 Park House Gardens  
8 Abbotsmede Close  
2 Cambridge Court  
25 Marble Hill Close  
40 Mallard Place  
119 Hampton Road  
11 Stuart Grove  
12 Fieldend Avenue  
43, 46, 47 Moormead Road  
The Cottage Riverdale Road  
41 Talma Gardens  
12 Broadway Avenue  
124 Stanley Road  
40 Popes Grove  
95 Colne Road  
46 Fifth Cross Road  
22 Fairwater House Twickenham Road  
34 Avenue Road  
64 Cambridge Road  
5 Rutland Road  
18 Heathfield South  
15 Waldegrave Gardens  
16 Grange Avenue  
7 The Almshouses Amyand Park Road  
19 Park Road  
16 Grange Avenue  
The Courtyard Evelyn Road  
5 Northcote Road  
36 Gothic Road  
37 Walpole Road  
2 Strawberry Vale  
26 Langham Road  
Millend House, Bredon  
19 and 27 Clifden Road  
Richmond and Twickenham Green Party  
14 Owen House  
30 Alton Gardens  
39 Elton Close  
84 Lincoln Avenue  
1 Hartington Road  
16 Blanchard House  
22 The Green  
Johnson Shoes Shepperton Business Park

**Main development plan policies:**

UDP CET 2 and 3, ENV 1, 3, 5, 8, 10, 16, 17, 19, 20, 22, 23, 24, 25, 26, 32, 33, 37, 38, 39, 40, 41, 42 and 43, HEP 1, HSG 5, 6, 7, 8 and 11, REC 4, STG 1, 2, 3, 4, 5, 6, 8, 9 and 10, SHP 2, 5 AND 11, RIV 1, 3, 4, 5 and 8, TRN 6, 7, 8, 15, 16, 22 and 23; UDP - First Review BLT 2, 7, 8,

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11, 12, 14, 15, 16, 17 and 18, CCE 17, 18, 21 and 22, ENV 1, 4, 9, 12, 18, 24, 26, 27, 28 and 30, HSG 5, 6, 7, 8 and 11, IMP 2 and 3, STG 1, 2, 3, 5, 6, 7 and 10, TC 2 and 4, TRN 1, 2, 3, 4, 5, 6, 8, 9, 10, 12, 22 and 23;CA8; Proposal Site T1 Twickenham Riverside; CAAC; adj Metropolitan Open Land; Thames Policy Area; Proposed Area for Environmental Improvements; Thames Landscape Strategy; Area of Mixed Use

**Present use:** Site of swimming baths, ancillary buildings, private car park and shop

**Site:** The application site comprises the former Twickenham swimming baths which includes buildings which have been occupied by, amongst other community uses, HANDS (Help A Neighbour in Distress Scheme) and a day nursery. It also encompasses the public WCs on the corner of Water Lane, the private car park on the west side of Water Lane and the Embankment, (including raised open grassed area to the east of the baths building), Water and Wharf Lanes, the latter three all being public highways. Finally it includes No.15 King Street which is intended to provide a pedestrian link to the site from the commercial centre of Twickenham. The majority of the site is owned by the Council, the car park and No.15 being under private ownership.

**Most relevant history:** Twickenham swimming pool was closed in 1980 following a decision that it was uneconomic to operate. Since its closure the baths site has remained empty apart from the aforementioned community uses.

There have been a number of schemes promoted for development. However, the only planning application to be considered prior to the current one and another scheme approved last year, was by Marks and Spencer. The proposal included the erection of a food store, community centre run by the YMCA, nineteen self-contained flats, pedestrian link from King Street, public conveniences and public open space. The application was called in by the Secretary of State and following a major public inquiry was refused planning permission in August 1991.

The main conclusions in the Inspectors report related to the following:-

1. The site needs to be seen and considered in the wider landscape context of a much greater stretch of the Thames rather than in isolation to the older part of Twickenham. It is an integral part of the larger river scene.
2. Proposed retail use for the site was considered to be inconsistent and excessive in size with regard to the Unitary Development Plan which looked to retain/provide leisure uses on the site.
3. The form, design and massing did not preserve or enhance the domestic scale and character of the conservation area or its riverside setting within an Area of Special Character and would introduce a seriously harmful development to the area.
4. New build would dominate the site and wider area whereas the existing building, whilst somewhat alien, had limited depth and thus retained the impression of openness behind and to the sides.
5. The pedestrian link, which crossed the service road, raised concerns regarding pedestrian safety.
6. It provided limited public access to the riverside and space to enjoy the river scene.
7. Insufficient consideration to traffic and parking generation as a result of the development. Servicing would dominate the area from Water Lane and parking issue had not been satisfactorily dealt with.
8. M&S and the YMCA, to a lesser extent, would have benefited the town but the negatives identified were sufficient to refuse permission.

**Policy framework:** Following that decision in 1991 the Council took stock of the Inspector's decision which became a seminal document in the policy development for the site, and the wider area, over the next 10 years. (The conclusion of the Inspector is at appendix A)

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**Strategic policy:** At the strategic level Central Government issued Strategic Planning Guidance for London Planning Authorities, RPG 3, in May 1996, complemented and further developed by Strategic Planning Guidance for the River Thames, RPG 3B/9B, issued in 1997. The latter is particularly relevant to the current case which clearly centres on the impact on the Thames at this juncture. RPG 3B/9B introduced the concept of the Thames Policy Area which requires that policies should be included in UDPs to protect the special character of the Thames. It also indicated that Local Planning Authorities should prepare detailed appraisals of their stretches of the River and its environs.

Remaining at the strategic level, the Mayor's Spatial Development Strategy, 'Towards the London Plan' (May 2001), which will supersede Strategic advice in due course, builds upon the concept of viewing the Thames, and other rivers/canals, as a special resource. A 'Blue Ribbon' network is to be developed to, inter alia, ensure new development contributes to the character of the river.....and achieves a high quality of urban design, especially improving public access to the riverside.

Under the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 72 imposes upon the Council as Local Planning Authority a duty to ensure that when considering planning applications within a conservation area they give special attention to the desirability of preserving or enhancing the character or appearance of that area.

### **Local policy:**

**The Unitary Development Plan 1996** remains the approved Development Plan however, the Emerging Unitary Development Plan First Review can now be given considerable weight as it has been through several stages towards adoption and the Inspector did not disagree or suggest material variations to the contents of Proposal T1, which is of great significance to this application.

There are a series of policies and proposals relevant to the application site in both Plans and these have been identified at the head of this report.

**Proposal T1** is the most relevant to the current submission and has been included as appendix B to this report for ease of reference. It includes the application site, 1-33 King Street and former car park on the east side of Water Lane (which has now been developed by a Housing Association for social housing). It seeks 'Enhancement of the Riverside and Shopping Area, Leisure Uses, Housing, Limited Improvements to Rear Servicing, Car Parking and Public Conveniences'.

In summary T1 seeks development in harmony with the small scale and domestic aspects of the conservation area and area of special character and to make a significant contribution to achieving the Thames Landscape Strategy (see below). A prime objective should be to provide the community with leisure uses and increased opportunities to enjoy the riverside. Limited improvement to rear servicing and protection of important trees is included.

Supplementary Planning Guidance (SPG) was prepared, prior to 1996, in the form of a Site Brief (this is not to be confused with the Development Brief issued by the Council as land owner) and this is at Appendix C. Both T1 and the SPG remain relevant although the latter now has less weight given Government's view that such SPG should not form part of the Unitary Development Plan.

T1 also identifies that Proposal T14 for a landing stage should be considered as part of any scheme. The Unitary Development Plan area chapter for Twickenham also seeks, inter alia, to develop the centre as a focal point for shopping, leisure and recreational facilities not only to provide for local residents but to supplement Richmond town centre's

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strategic role; to seek improvements to rear servicing to King Street; to discourage car commuting by controlling on site parking; nor allow buildings which are significantly higher than the surrounding area; and to protect the important character of the riverside.

**The Thames Landscape Strategy**, a non-statutory document but adopted for Development Control purposes, partly evolved from the M&S Public Inquiry in 1991 and is particularly relevant to this application. It notes the importance of the site and the pressures it is under. It recommends under specific policies in the Thames Landscape Strategy for this site that development should conserve the intimate scale and working character of the Twickenham and Eel Pie Island waterfront; conserve the tree framed setting of Twickenham Riverside; secure possible connections to the town centre; encourage a passenger boat stop; set car parking back from the river's edge and improve the layout and seating of the public spaces.

**The Twickenham Riverside and Queens Road Conservation Area Study** refers to the Unitary Development Plan and Thames Landscape Strategy as setting the site in context and identifies it as a major problem which blights the western end of the Embankment in particular. The Study picks up on the points already made above under the Thames Landscape Strategy policies/proposals.

**The emerging Unitary Development Plan - First Review** carries through the above and Proposal T1 is very similar in content to the Adopted Unitary Development Plan T 1. This is set out in full at Appendix D. The Water Lane car park has now been developed by a Housing Association and the reference to the provision of affordable housing is dropped but the modified Proposal states that new housing should include a substantial element of small units of accommodation. Proposal T14 continues to seek provision of a landing stage as part of the overall scheme. The Plan continues to seek improvements to Twickenham in the area chapter as described above.

The Emerging Unitary Development Plan has introduced the concept of the Thames Policy Area as promoted by RPG 3B/9B, and policy ENV 26 of the Plan refers. The policy requires developers to provide detailed design statements justifying schemes based on a number of important issues. Moreover, the detailed appraisals of the riverside also required by strategic advice are fulfilled for much of this Borough through the Thames Landscape Strategy already discussed above.

**Other local policy issues;** The site falls within an Archaeological Priority Area, an Area of Mixed Use and an education deficiency area. These are discussed, where relevant, in more detail under Professional Comments.

**More recent planning history:** Following the refusal of the M&S scheme, a competition was launched in 1996 by the Council for the redevelopment of the site. The chosen architect/developer partnership was Alsop Zogolovich/First Premise Ltd. An initial scheme proposed a new Arts Centre, with low level commercial development including a number of restaurants. The scheme failed to attract Arts Lottery Funding and an amended scheme including enabling development was proposed.

In the light of public opposition to this scheme the Council invited three working parties to comment on it and subsequently their input helped to develop a development brief for the site. The three groups are the River Use Working Party, the Traffic and Access Working Party and the Urban Design Working Party.

It should be noted that this was not a town planning brief but a corporate one developed by the Council as land owner (finally becoming the Twickenham Riverside Development - Final



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Revised Development Brief (Rev B) October 2000). It is distinct from T1 and the SPG issued with the Unitary Development Plan 1996 referred to above.

However, the development brief required that the specific framework for development should include as policies/proposals from the Adopted UDP, original site brief for Proposal T1, 1991 Inspectors Report, policies from the Thames Landscape Strategy, Twickenham Riverside Conservation Area Study and Strategic Guidance for the river Thames (RPG 3b/9b). The Council required that two schemes be developed to the next stage as sponsor of the development, with a common core to the proposals including the following;

1. A pedestrian link from King Street.
2. A 'town square' providing opportunities for outside performances.
3. A health and fitness facility incorporating a swimming pool.
4. A balance of enabling commercial uses comprising restaurants, shops and residential.
5. Provision of public toilets and a river pontoon.
6. Improvements to the local environs.

Option A proposed a three-screen cinema, with one screen available for use by the community as an auditorium. Option B proposed a discovery and heritage centre including arts facility, café and shop, tourist information centre and support facilities.

The Alsop Zogolovich was not proceeded with as the preferred design team and in July 2000 the reserve team put forward a proposal in October 2000 that DDSF Ltd, the adjacent landowner, should become the preferred developer. Following this proposal the Council with DDSF Ltd selected MacCormac Jamieson and Prichard (MJP) from a short list of architects suggested by members of local amenity societies.

Consultations were carried out by DDSF Ltd, MJP and the Council with local groups including meetings and a public exhibition.

In February 2001, following a presentation to the Council's Resources Committee of the two options in the agreed development brief, Option A (the cinema) was chosen on the grounds of the commercial non-viability of Option B.

The application the subject of this report is described more fully below and is based on that development brief.

**Other recent planning history:** A planning application was received on 8 March 2001 from 'K R Hathaway for The Committee' (ref: 01/0540/FUL). The application proposed to remove the top floor of the baths building and create a roof terrace from it with railings to the edge of the flat roof. The ground floor would be converted into a tourist information centre, public lavatories and a boat hire and booking office and the front elevation would be altered to form a series of arched openings. The pool would be filled in and converted to a riverside park. Steps were shown on either side of the main building giving access to the new open space. The current uses on the site would be retained. The public WC land would become open space. Existing trees were shown to be retained and new ones planted, particularly in front of the building. Although the proposal fell short of meeting all the criteria of Proposal T1 it was not considered to prejudice a future fuller development of the site and adjoining land and the scheme was therefore approved by Development Control Committee on 19 July 2001.

**Current proposal:** The proposal includes the demolition of the existing buildings (considered separately under 01/2583/CAC reported after this application) and construction of new mixed use development including housing, A1/A3 uses, three-screen cinema, health club and swimming pool, new public space and environmental improvements to the Embankment, Wharf

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Lane and Water Lane. Demolition of ground floor of No.15 King Street to create a new pedestrian link through the development to the river.

**Land use:** The scheme proposes a three-screen cinema, health and fitness club and swimming pool all of which is accommodated largely in below ground accommodation. The principal ground level is given over to public open space/piazza and to A1 (shop) and A3 (restaurant/bar) units. They would be located on a raised plinth to take account of the fall in levels of the site of approximately 3m from King Street down to the Embankment. Stairs and a ramp give direct access to the Embankment.

The public WC's have been replaced by two new facilities located at the west end of the Embankment and near the new pedestrian link from King Street. The proposed residential accommodation is to be located on the two upper floors; 46 units in total comprising nine three bedroom, 20 two bedroom, 12 one bedroom and five studio units. Two flats would be lost from the breakthrough at 15 King Street the adjoining flats being extended into the upper floors remaining. Underground parking will be provided for the new residents and 19 replacement spaces are also proposed in the basement, accessed from the service road. The public space on the site is defined as a series of areas off a raised terrace that overlooks the Embankment. The existing Seaboard substation located on the site is to be retained and relocated.

**Design and massing:** The architect advises that the design has been inspired by the context of the Twickenham Embankment level and by its riverside setting. The principal ground level of the site has been raised above the existing Embankment level, making reference to the terrace walls associated with the site and the area. This raises the ground level above flood level, but also mediates the 3m drop between King Street and the Embankment. The terrace wall is articulated with windows to the swimming pool and health and fitness centre, stairs and ramps from the Embankment level, and seats and litter bins built into the structure. Above the terraces' base, which forms a raised ground plane, the development is defined by a series of two and three storey linear blocks that seek to allude to the boat house tradition with exposed wood frame and timber infill, their strong roofline and gables fronting onto the river.

**Traffic and parking:** The road layout is being amended to extend the service road to Water Lane to provide improved access, and avoid/minimise service vehicles having to cross the Embankment. Junctions have been designed to accommodate 12m fixed axle vehicles and 16.5m articulated vehicles.

On site parking is provided at one space per residential unit (46) and 19 spaces to replace current business parking provision off Water Lane. Four disabled parking spaces are designated within the on site car parking. On site cycle parking is provided at a rate of 1 per residential unit in the car park and 16 for retail/restaurant use. An additional 32 cycle spaces are provided on the embankment. It is concluded that visitor parking for A1/A3 and other leisure development can be accommodated in existing public off street car parks in Twickenham town centre. Comprehensive signage on approach roads to Twickenham town centre to direct visitors to off street parking will be provided.

Three loading bays are proposed along the service road to allow for servicing King Street properties and the new development. The service road, where it crosses the pedestrian route, will be distinguished with tactile paving and bollards to identify vehicular route. Disabled parking spaces are shown around the site.

Further environmental improvements/suggestions propose to:-

1. Prohibit visitor parking in the Embankment area except for disabled visitors and visitors with residents or business visitor permits.

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2. Designate all parking on Water Lane/Wharf Lane and the western Embankment as resident/business/disabled parking.
3. Open the car park under the civic centre during weekends and evenings and make preferential arrangements for local recreational clubs on Eel Pie Island.
4. Provide dedicated residents parking bays in Flood Lane car park.
5. Provide designated loading bays for the residents and businesses of Eel Pie Island at the end of Water Lane.
6. Provision of a river pontoon through a further planning application if feasible.

Several of these matters will require changes to Regulations not under the control of the applicant and will therefore be dependent on amendments to the CPZ, possible road closures and funding.

**Trees and landscaping:** Five Hornbeam trees on the northern boundary of the site (junction of Wharf Lane and rear service road) are to be retained as part of the development proposal. Six other trees in this location are identified as being diseased or in poor condition and will be removed.

Due to changes in ground level some of the retained trees will need to be set in raised planters. The exact size of these will be determined on the basis of further site investigation.

It is proposed to retain all the larger trees on the Embankment although some thinning of the trees at the western end is required. As such it is proposed to remove two of the five horse chestnut trees in this group.

Hard and soft landscaping can be split into three areas:-

1. On site hard landscaping.
2. Hard and soft landscaping to residential.
3. Environmental improvements to the Embankment, Water Lane, Wharf Lane and the service road.

On site hard landscaping extends the grain of the site in bands of yorkstone paving banded by granite sets. The central band defines the pedestrian link to King Street. The service road will be defined with textured paving, stainless steel bollards and yorkstone sets on the carriageway.

The connection with King Street is being formed by removing the shop unit and independent access to flats at No.15 King Street. Defined by a canopy onto King Street and proposed high levels of lighting the entrance is intended to act as a beacon and provide a pedestrian environment. It is proposed that small kiosks could line the sides to provide animation along the route.

The landscape terraces above the retail accommodation will not be open to the public and will have largely soft landscaping at seat height and raised beds separated by Yorkstone paths.

Environmental improvements to the Embankment, Water Lane and the extended service road, include refurbishing the existing Embankment wall and railings, new paving to the Embankment and concrete sets to the road ways. Raised planters around existing trees will be rebuilt to form sculptural boat like elements and access to the river opened up as much as possible. Some of these proposals are subject to amendments to the CPZ and funding.

New signage is to be proposed around the site with the aim of instigating a wider signage strategy in the town centre to town centre car parks to minimise extraneous traffic using Water Lane and the Embankment. Power points are to be provided to support events on the

## **DEVELOPMENT CONTROL COMMITTEE - 28 FEBRUARY 2002**

Embankment and the spaces on the raised terrace. These will be located in positions above flood levels.

**Archaeology:** The applicant will meet the requirement of English Heritage with regard to pre-development site investigations, having produced a first report on the subject.

**Sustainable development:** The applicant identifies how the scheme will be developed at all stages with sustainability to the fore in a number of ways.

In summary, supporting statements were received from the applicant on design and transport matters. The design report states that whilst it is never possible to satisfy everyone's aspirations, they believe that the perseverance and efforts of both the LBRuT and local people have resulted in a scheme for the site that is superior in both content and appearance to any that have gone before, and a development that promises to be a real community asset for residents and visitors alike.

The Transport Assessment discusses the traffic growth, parking and access arrangements for the riverside development and includes a Green Transport Plan and implementation strategy for pedestrianisation for Embankment. It seeks to demonstrate that the access and parking designed by the architects wherever possible complies with design standards and good practice. It is recognised that there is a commitment by the Council within the UDP to pedestrianise the Embankment between Wharf Lane and Water Lane. However, it is concluded that the closure of the Embankment to traffic is not deemed necessary for the operation of the development.

### **Public and other representations:**

**English Heritage (Historic Buildings)** consider that appropriateness to its context seems to be a most important test, and one that the present scheme fails. The submitted scheme is larger, both in size and in scale, than the context can accommodate. The shallow curving roof forms, which echo boat sheds, would possibly be acceptable for a part of the development, but repeated to the extent and density shown in the submitted drawings lose their casual riverside quality. The almost-symmetry of the scheme, combined with the raised podium that isolates the buildings from their immediate setting, gives it a curiously dated town centre redevelopment character.

**English Heritage (Archaeology)** request that a condition be attached to protect the archaeological potential of the site.

**Commission for Architecture and the Built Environment (CABE)** welcome the mix of uses contained in the development. The design understands and responds to the 'grain' of its surroundings and is all the more successful for the result. It is considered that the three to four storey bulk of the building seems perfectly appropriate for the riverside setting, as does the boathouse aesthetic.

**The Environment Agency** has no objection, in principle, to the proposed development provided that a number of conditions are imposed on any planning permission granted. These include ensuring no loss of flood storage water capacity, use of sustainable drainage systems. Suggestions are made to lower the river wall and incorporate terracing to improve wildlife at this important river location.

**The Port of London Authority** raises no objection in principle to the proposed redevelopment of the Twickenham Baths site and is supportive of the environmental improvements to the river embankment and the proposed public uses at ground floor level, which will promote public enjoyment of the riverside in accordance with RPG3b/9b and the Council's Planning Brief.

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**Thames Water** raises no objection to the application and provides contact details for the developer in the event that planning permission is granted.

**Conservation Area Advisory Group** - Whilst the panel considered the scheme imaginative in design and detail, it was considered that it would not harmonise with the scale of the surrounding conservation area due, in particular, to the excessive height and forward projection of the buildings. A rethink is needed for certain elements of the scheme to reduce the scale and create more convincing open space for the public's use. Concern was expressed about the use of curved roofs, particularly as finished in aluminium, which could create an alien form within the immediate locality and this adding to the lack of integration into this historic conservation area. The massing and scale was felt to be unacceptable and should be reduced in order to produce a successful scheme.

The **Twickenham Society, Eel Pie Boatyard, the Eel Pie Island Association, Eel Pie Island Slipways, the Environment Trust for Richmond Upon Thames, the Eyot Lodge Residents Association, Richmond Yacht Club, HANDS, the LA 21 Building Responsibility Group, the Richmond and Twickenham Green Party, the Richmond Environmental Information Centre, the River Use Working Group, the Strawberry Hill Residents Association, the Thames Eyot Residents Association, the Traffic and Parking Working Party**, 129 letters from individuals, 17 pro-forma letters and two petitions one with 11 signatures and another with 16 signatures have been received and objecting on the following grounds:-

1. A cynical and inappropriate use of this precious site which should be kept for the enjoyment of the people of Twickenham, for whom it was originally purchased.
2. Gross over-development of the site, exclusion of the public to a far greater percentage of the site, detrimental to the environment of the riverside and over development of the river flood plain.
3. The layout and density of the development results in loss of public use of the site.
4. Over-development of a sensitive area, with no specific link to the riverside nature of the site, poor quality of design.
5. Loss of light, overlooking, overshadowing and loss of privacy.
6. The proposal does not comply with the site brief, development plan policy T1 Thames Landscape Strategy, Environment Agency Requirements or PPG 25.
7. Over provision of retail etc units at ground level will result in boarded up spaces and an air of dereliction.
8. The residential dwellings in the development are inappropriate, too numerous and to our present knowledge do not fall into the category of affordable housing.
9. Proposal would involve substantial loss of visual amenity as well as loss of trees along the embankment.
10. Public benefit offered through the private Health Club and cinema is uncertain and even as intimated, is inadequate.
11. In view of regular flooding of the area in high tide we are concerned for the safety of users of the proposed underground cinema so close to the river.
12. The development of a terrace lined with restaurants and bars will lead to the properties opposite on Eel Pie Island losing their privacy.
13. Local charities using the site have been displaced into unsuitable premises.
14. Inappropriate location of public conveniences on an area of the Embankment which is submerged during periods of flood.
15. Noise and fumes from boiler, chillers, heating and ventilation and air conditioning associated with basement and ground floor uses.
16. The architects have rejected the vision of the River Use Working Group outright. The large blocks of building going head on to the river works against linked intimate areas of open space, and forces a linear pattern.
17. The proposal does not comply with the guidelines of the Inspectors Report from 1991 Marks and Spencer scheme.

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18. The Inspectors report stressed that the significance of the site as a riverside site and recommended only two/three storey buildings should be allowed. 'In our view he was right and his recommendations should be followed.' The report also referred to the harmful effect of a single mass of building taking up half the site
19. The main buildings are too long and too imposing and would benefit from being cut back.
20. The amount of public space is less than optimal, there should be larger areas for general circulation.
21. The proposed plans bear no comparison with the UDP policy T1 which stated that 'Development should be in harmony with the small scale and domestic aspects of the parts of the conservation area which give it its distinctive character so as to enhance the conservation area and area of special character.
22. The architectural forms, reminiscent of a 60s new university, are totally unsuitable for the gentle classical architecture of Twickenham Riverside and King Street. They are not in harmony with existing.
23. Design of the buildings and the materials used is totally at variance with the existing ambience of the area.
24. The scale and massing and monolithic shopping precinct aesthetic does not preserve or enhance the special character and appearance of the conservation area.
25. There are large areas of paving, elevations of reconstituted stone, cedar board, and roofs of raised seam aluminium which will only blend in with the one nondescript '60s building at the corner of Water Lane and King Street. The proposals will stand out like a sore thumb in an otherwise mainly brick walled, pitched tiled roof conservation area, on a river bank that has varied historical legacy of intimate riverside buildings. The development will dominate and overlook what is essentially a user friendly waterside amenity area, for visitors, residents and their children.
26. Trees are likely to be damaged or destroyed during construction, as plans call for deep excavation in the area currently occupied by their roots.
27. Concern that no Environmental Impact Assessment has been submitted.
28. Parking provision for riverside residents, nearby businesses and visitors to the riverside area is inadequate.
29. Access to the site for pedestrians, particularly the disabled, is not sufficiently defined. The service road in its proposed form is inadequate for its purposes.
30. Traffic generation is likely to be greater than assessment suggests.
31. Highway safety issues have not yet been fully addressed.
32. The Transport Assessment does not fully conform with the UDP Policy TRN 2 Requirements for a Traffic Impact Assessment.
33. The proposed position of loading and turning areas in the open space by the terrace steps is totally unsympathetic to the everyday ambience of the riverside.
34. Access and parking proposals in the TIA will have drastic effects on the whole riverside community. The boatyards and clubs on Eel Pie Island face disaster within months. Such an outcome is clearly incompatible with: the Thames Landscape's Strategy to sustain what remains of the working river front; LBRUTs aims of increasing tourism, given the boatyards and clubs are part of the local appeal to tourists; LBRUTs objective of using the redevelopment to regenerate the town centre, since loss of character means loss of customers too and the wish of LBRUT to encourage the development of local businesses and leisure facilities in the borough as a whole.
35. Entrance and exit via an inadequate two-way system and a service road that is far too narrow.
36. Turning areas that are impossible to negotiate safely at the riverside and at the entrance to and exit from the service road.
37. Loss of 'pay and display' parking along the Embankment. The concept of parking in the Holly Road car park would not be tenable given the equipment necessary for business and leisure pursuits associated with the river.
38. The plans call for a cut through from King Street to bring a flow of pedestrians across the service road. There are no safety measures to protect those on foot.

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Four letters of support have been received (two from the same author) with the following comments:-

1. The writer is delighted with the proposal in every way as it would be beneficial to Twickenham and benefit the town generally.
2. The river is a beautiful commodity and should be treasured and used by all and this development allows residents to use the bars and restaurants to view the river, whilst also providing much needed amenities such as the swimming pool.

**Amendments:** The following amendments have been submitted:-

1. The applicant cannot control works to the Embankment but in response to objections received an alternative layout is put forward showing more parking on the riverside, an enlarged loading area for Eel Pie Island and a suggested controlled vehicle access along the Embankment for service vehicles during agreed hours. This suggested plan is for illustrative purposes only at this stage and if the application was permitted detailed proposals for the Embankment would be reserved matters, requiring subsequent detailed approval.
2. Enlarged piazza area facing the river by setting part of the single story building further back into the site.
3. Analysis of visibility of site and further justification for massing etc including photo montages seeking to demonstrate the scheme does not have a wider impact on the Thames. More detailed design statement commenting on third party representations including impact on the Thames Landscape Strategy.
4. Further information submitted regarding highway, traffic and parking.
5. A1 shops/A3 restaurants suggested split to be 5-15%/85-95% respectively.
6. Auditorium 2 to be available for 14 weeks a year as community arts centre.
7. Swimming pool to be open 10am-midday and 2pm-5pm and one afternoon each weekend for non-member usage.
8. Confirmation that funding for the environmental improvements will form part of the development agreement.
9. Minor elevational alterations.

A supplementary planning support statement was also submitted with the amendments that provide further justification in response to consultation on the scheme. In particular the report aims to address issues of visibility and conservation, whether the development would have an adverse impact on the character of the river and the conservation area. Issues relating to transport are also included in the summary and expanded further by a supporting document from WS Atkins, the applicant's highway Engineer. This document seeks to clarify the traffic generation and impact on the surrounding highway network, parking demand and reserve capacity in off street car parks and clarification of highway design issues.

**Reconsultation:** Interested parties have been notified of these changes, information has been put in Twickenham library and the Civic Centre.

13 letters including comments from **Eyot Lodge Residents Association and The Marble Hill Society** have been received in response to re-consultation, reiterating previous concerns and with further comments as follows:-

1. The report [Supplementary Planning Support Statement submitted with amendments] seeks to define a 'rural' setting by repeatedly using the term 'village' Twickenham, but the end result is overbuilding.
2. Concerned with the vagueness of the term 'Phase 2'.
3. The planning proposals by Dawnay Day for an intensive redevelopment of the former baths site to create a modern building complex on the historic riverside at Twickenham appear to

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- be in stark contradiction to the aims and the spirit of both the Thames Landscape Strategy and the Arcadia in the City Initiative. The Marble Hill Society regards it as one of the inappropriate developments the Thames Landscape Strategy is intended to help prevent.
4. Amendments to an unsuitable and unpopular scheme are therefore we consider irrelevant and in any even barely attempt to address some of the objections made about the proposal, which we fervently hope will be withdrawn.
  5. We object strongly to the intended plan to allow so many restaurants/pubs/wine bars in such a confined area. Lessons already learned from the Richmond Riverside tell you that even more so, the proposed use of the site would create many community problems.
  6. WS Atkins Traffic Impact and Parking Assessment report dated February 2002 makes no mention of the needs of Eel Pie Island residents, clubs or businesses.
  7. The assumption that people will use public transport to visit various facilities is misguided and dangerous.
  8. The site plan from September 2001 gives a false impression of the development. The areas shown in green indicates an expanse of public space, this is not the case. When viewed from the front these areas are raised well above the view of the public and all that can be seen is the front of a high density development, and not one in keeping with the established quiet and tranquil use of the riverside.
  9. The 'community' uses e.g. hours of use of pool are insufficiently defined.

**Professional comments:** The planning merits of this application must be considered within the context of local and strategic planning policy and guidance and all other material factors. In particular proposal T1 and other policies of the Unitary Development Plan, the Thames Landscape Strategy, Twickenham Riverside Conservation Area Study and Regional Planning Guidance (RPG3b/9b) - Thames Policy Area. These have been extensively covered in the preceding paragraphs and detailed in the appendices.

They should be considered by examining the land uses proposed; how they fit into the area through an analysis of design and massing; whether the workability of traffic management and parking proposed is satisfactory; an assessment of the likely impact of the proposals on neighbouring properties and the wider area; and other issues including archaeology; education supplement.

The need for an Environmental Impact Assessment has been raised through the consultation process. This issue has already been dealt with when the Local Planning Authority determined that an EIA was not necessary when assessed against the criteria laid down in the relevant Regulations. Legal advice concurred with this view. This decision was taken prior to the receipt of the formal planning application but with sufficient information before your officers to take this considered decision.

### **Land use:**

The current site clearly is an eyesore and provides little in the way of benefit to the town.

Proposal T1 seeks enhancement of riverside and shopping area, leisure uses, housing, limited improvements to rear servicing, car parking and public WCs. Rear servicing and car parking will be considered under the Traffic management section of this report.

**Riverside enhancement:** The application seeks to link the site to the commercial centre of Twickenham via the proposed pedestrian route at 15 King Street that will draw people through to the site and onwards to the riverside. The piazza area will provide an opportunity for the public to take the views of the river from a different perspective to that currently available. Moreover, there will be an enhancement for the public to enjoy a higher level walk way as well as at current river level. The latter



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will be improved through hard and soft landscaping with the possibilities of further pedestrianisation of the current roadway to enhance the river area. Whilst the full pedestrianisation of the Embankment may be a well founded aspiration, neither the current Unitary Development Plan nor its First Review insist upon it. However, the applicant is suggesting, in amendments to the scheme, how this could be partly achieved whilst maintaining more of the existing parking and loading areas for the locality. The eventual solution to this aspect of the scheme cannot be fully detailed at this stage because it requires the possible closure of public highways and other highway regulatory processes which have yet to be undertaken and are not within the gift of the applicant. Conditions can be included on a planning permission to secure this element following further studies as the best compromise between pedestrians and limited parking/servicing.

The uses proposed are likely to draw the public along the riverside, as well as from other directions, thus creating a livelier and better-used part of the town. Security is likely to be enhanced due to a greater presence of the public, users of the facilities and residents living above. The piazza could become a meeting place for both informal and formal activities.

**Shopping enhancement:** The mixture of A1 shops and A3 restaurants, with the link from King Street, should assist in the regeneration of the shopping area. Whilst these are not a specific requirement of the Unitary Development Plan the A3 uses are a recreational activity and both uses will help to encourage movement to the site. They are however in accordance with the general policy of the Unitary Development Plan to encourage new retail provision to Richmond and the district centres, of which Twickenham is one.

The exact split of uses is primarily reliant on market forces and the applicant has requested as much flexibility as possible within the constraints of any planning decision. There are arguments for and against having a greater or lesser proportion of the two main components. The Unitary Development Plan is not specifically seeking A1 floor space on this site whereas A3 uses can provide recreational activities and could be complementary to the other leisure proposed uses. Conversely A3 uses throughout the ground floor will be likely to have more impact on traffic, particularly in the evening period. The traffic issue is addressed in the Highways section below, but for these reasons it is suggested that this matter be conditioned to enable the Local Planning Authority to have control over the final mix of uses that will take into account the applicant's requirements for flexibility.

**Leisure:** Leisure uses comprise the cinemas, health and fitness club, A3 uses and the provision of the piazza that creates the opportunity for passive activity and organised functions which could and should also utilise the Embankment, for example a French market or similar function. Such facilities fulfil this requirement of the Unitary Development Plan in land use terms.

Moreover, the applicant has offered that one of the cinemas can be used for 14 weeks in the year for local art groups to stage dramas, music; and that the pool can be accessed by non-members during off peak times; namely 10-midday and 2-5pm, Monday to Friday and one afternoon at week ends. These are to be welcomed as additional facilities for the local community over and above the general leisure facilities being offered as detailed above.

It is arguable that none of these leisure uses respond in functional terms directly to the river i.e. there is no boat related activities etc but T1 does not explicitly state that there has to be such a direct link. Moreover, as discussed the scheme improves

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pedestrian access and the environment and the potential for enjoyment of the riverscene as viewed from the buildings and public open spaces.

There may be other ways of developing the site providing different land uses but the scheme submitted generally reflects the requirements of T1 in terms of retail and leisure.

**Housing:** The proposed housing provision in the latest T1 requires that a substantial element should be small units. This is normally taken to be 25% of the total of any residential scheme that should be studio and one-bedroom units. Of the 46 units proposed 17 (38.6%) fall within that category.

Whilst the latest version of Proposal T1 (Emerging Unitary Development Plan First Review) does not require affordable housing, as it has already been provided on the former Water Lane car park (eight units) the Unitary Development Plan 1996 and Emerging Unitary Development Plan, seeks such provision and, now, the Local Planning Authority seeks 40% of units as affordable on developments of 15 units and above.

This has been raised with the applicant who advises that the need has been met on the adjoining site but that if affordable housing was introduced with its inherent lesser land value then more development would be required to pay for this element. The developer has sought to meet this issue by providing a greater number of small units than the Unitary Development Plan requires providing a better and less exclusive social housing mix.

The issue of financial viability can be a planning consideration. I am advised by the Council's consultants that if affordable housing was to be included in this case, it is almost certain that further development would be necessary to fund such provision.

HSG policies seeking to achieve affordable housing do not state that such provision must be achieved on every site over the threshold figure of 15 units. It is a matter for negotiation and will vary with the circumstances of each site. The thrust of the policy is to achieve 40% of all new units as affordable over the life of the Plan.

Therefore, bearing in mind the absence of a stated requirement to provide affordable housing in Proposal T1 in the UDP Review, it is therefore that the current mix meets, with a greater percentage of small units, the general approach adopted by the Unitary Development Plan for this site.

Provision has been made for disabled and wheelchair housing with regard to lifts and parking spaces in accordance with Plan policies.

**Public conveniences:** Two sets are proposed, one close to the new access route from King Street, the other at the west end of the Embankment. Both will be suitable for disabled access. The latter one will need to be in a slightly raised position to avoid flooding but is partly screened by the treescape and will be further encouragement to users to access the riverside. Their size and location are acceptable.

**Landing stage (T14):** Both Unitary Development Plan proposals recommend that such a facility be incorporated into the redevelopment of the baths site to promote river usage which is encouraged at both strategic and local levels of planning policy.

The applicant advise that they have carried out work on this issue and there are potential problems with low flows of water and other users of the river at this relatively

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narrow stretch close to the foot bridge. The Port of London and Environment Agency have apparently raised concerns about this. However, the applicant has advised that they will carry out further studies as to whether the competing issues can be satisfactorily resolved as part of a further phase which will include assessments of how to best deal with the part or full closure of the Embankment. They further advise that if it is technically viable to undertake these works these would be completed as part of their scheme subject to planning permission. This is therefore not part of the current planning application but it is suggested that the commitment to carry out further studies be included in a legally binding agreement

### **Design, scale and massing:**

**Introduction:** Much of the extensive correspondence received from the applicant, statutory consultees (English Heritage and others), third parties, including several of the main amenity groups, and the CAAG have commented on this aspect of the scheme in particular. It is of vital importance to this key site in the heart of Twickenham Conservation Area and Thames Policy Area. Proposal T1 and the supporting documents including the Thames Landscape Strategy, the Conservation Area study and more general strategic advice flow from the Inspector's report on the M&S scheme.

**Context:** One of the key statements in T1 advises that it '....should be in harmony with the small scale and domestic aspects of the parts of the conservation area which gives it its distinctive character so as to enhance the conservation area and the Thames Policy Area and make a significant contribution to achieving the Thames Landscape Strategy.' This does not necessarily mean that the new build must be domestic in scale but that it must harmonise with the older part of Twickenham.

The Thames Landscape Strategy and Conservation Area study require it to 'conserve the intimate scale and working character of Twickenham and Eel Pie Island water fronts'.

The Inspector concluded that the site could not be looked at in isolation in that it forms part of the wider river scene; that it is part of the experience of moving along the river; and that it needs to be judged in the context of the domestic scale surrounding. He further opined that the present building tends to dominate the riverside which is further compounded by its alien design.

Generally, buildings in Twickenham scale down to the river and this is partly reflected on Eel Pie Island. Thames Eyot, a four storey linear block of flats to the south-west of the site, should not be taken as a qualitative characteristic of development of the town. It is more alien to the appearance of the area and is not in conformity with the more intimate scale that is considered the proper approach to take for this site. The baths building at between approximately 8m and 10m in height, as measured from the Embankment, is not commensurate with the historical evolution of the centre's development that the various planning policies seek to ensure. However, as it is not a deep building the perception is of space around it, which helps somewhat to mitigate its uncomfortable bulk and design.

**Current scheme as amended:** The applicants design justification, as resubmitted, has been set out at Appendix E because this aspect goes to the core of the proposal. This should help members understand how the architect has responded to the site's challenges.

**Height and bulk:** At the Embankment the new build effectively sits on a podium to prevent flooding and to utilise the cross fall of 3m in height. Unlike the M&S scheme

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the proposed built form avoids following the building line of the baths structure along the Embankment. Instead it seeks to provide a series of linear buildings running at right angles to the river with varying recesses to break the building mass down, a reflection of the narrow street pattern of Twickenham. However, the height of those elements which come closest to the river measure 15m in height as a maximum to the top of the curved roof. This is an absolute height and is not carried along the frontage but projects forward in varying degrees in seven of the eight blocks. The widths of these blocks are 7.5m each. Between them are similar buildings but set back from the frontage. The upper parts are in the form of balconies and therefore have an open aspect but with a covered roof. Maximum eaves level is 13.6m as measured from Embankment level.

The most easterly end block drops to two storeys and its eaves height is 10m (average) compared to 5.5m eaves on the houses opposite although the houses have proportionately higher ridge lines.

Design and materials are discussed below but the scheme has a single architectural style with external materials the same through out the development.

The impression from the proposal is that it does not relate to the domestic scale and character of the waterfront/landscape. This is evidenced by the tall ground floor retail uses, with columns emphasising the height; the scale of the building on the Water Lane frontage; and a comparison to the ridge heights of King Street behind

Heights of 15m are not a common feature on the riverside and so close to the water's edge. Thames Eyot is a large wide building set back from the river but the Inspector did not consider that the baths site should relate to that as it did not contribute to the appearance of the locality (although the Council has recognised it as a BTM due to its individual characteristics rather than its contribution to the river scene).

The applicant has sought to show through further drawings and analysis that the scheme is in harmony with the variety of building heights nearby. That the recessed plan of some of the building foot print will provide a varied profile to the viewer and that light and views through the scheme will prevail particularly as the baths structure will be removed, which provides a solid unrelieved mass to much of the frontage. It is argued that the proposal is not a sheer wall of building but a series of linked spaces at a human scale. Whilst noting these arguments in support of the massing, officers remain concerned that the domestic scale could still be eroded by the quantum of development proposed.

Clearly this issue centres, to a large extent, on a subjective judgement as to whether what is being proposed will overdominate the site and the immediate surroundings, which in turn could impact on the wider views of the site. The size and siting of the new buildings would partially block lateral views as one progresses down Water and/or Wharf Lanes. This lessens the visual linkage of the town to the riverside. However, in mitigation trees do partly screen one of these views from the King Street end of Wharf Lane and would be likely to continue to do so assuming the trees remain. Moreover, looking down Water Lane it is quite apparent that the river terminates the view due to its visibility from King Street and thus the larger building proposed would not impinge particularly on the direct view to the river.

The approach taken has sought to create a series of land mark buildings tied by the common theme of design and external materials, providing the type of land uses sought by the development brief. The argument centres on whether the enabling

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development, primarily the flats, works visually without harming the character and appearance of the locality.

**Long views:** The applicant has sought to demonstrate through the use of photomontages how the proposal would be seen, particularly in silhouette, walking from Richmond on the Middlesex side and as viewed from Radnor Gardens to the south. Whilst they give a clearer appreciation of the impact of the scheme from these distant views they do show that it will be of a greater scale than the boat sheds on Eel Pie. No information has been provided in a similar form from the Ham bank. It is therefore arguable that the development will have more than just a limited impact on its wider context.

**Design:** An identical design theme coupled with external materials runs through the scheme. It is arguable that by changing elements of the proposal and having contrasting but complementary designs picking up on some of the characteristics in the historic core of Twickenham could be a preferred way of seeking to address a development which should be in harmony with the domestic scale nearby.

By maintaining the same theme this can be said to add to the perception of mass and bulk and possibly be open to argument that the scheme could be located anywhere rather than purpose designed for this site.

However, having carefully considered the numerous representations from many well-articulated sources, the single design concept is not considered to be inappropriate in this location. Indeed whilst it must be understood that it is the scheme rather than the architect that is being judged the design has been produced by an architectural practice with a high reputation in the country, which was selected by the community in 2000. The type and quality of the materials being suggested are welcomed. This latter point also relates to the hard surfacing proposed for the Embankment, piazza etc which will provide a highly attractive surface to complement the area.

In summary it is not the design approach that is the key issue but the quantum of development above ground and how it impacts on the local and wider area which is the most germane aspect for members to consider.

### **Traffic management, parking and servicing:**

There are a series of interrelated issues that can usefully be dealt with under the following headings;

**The Embankment:** The applicant submits that whilst the scheme seeks to meet the Council's objective of reducing traffic using the Embankment and thus enhancing the area for pedestrians, in their view either the stopping up or part closing of the highway is not a pre-requisite for the implementation of the application. However, drawings have been submitted including the Embankment in the application site and thus it is open to the Local Planning Authority to consider it as a material factor in judging the scheme. But it is accepted that the applicant cannot carry out this part of the development without further surveys etc. This can be the subject of a planning agreement or such other legally binding agreement to ensure there is funding available from the development to pay for Traffic Order amendments and consequent costs etc.

An illustrative plan has been submitted indicating how such work could be carried out indicating parking and loading areas but it is not a definitive solution because the land forms part of the public highway and is therefore beyond the developer's control. Clearly there would be a need for the Council to pursue this through other legislation

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but with a commitment from the developer to fund the work to a reasonable level commensurate with the scale of development proposed.

Some minor stopping up of the highway is required as the proposal projects onto a small part of the pavement either side of the forward projecting part of the baths building. It would also take up some of the turning circle at the current end of the service road, which will become redundant with the introduction of the one way system. This will need to be the subject of an application to the magistrate's court following any grant of planning consent.

**Traffic management:** Following consideration of the Traffic Impact Assessment, submitted with the initial planning application in September last officers have met with the applicant's advisors and further information has now been submitted seeking to answer in more detail points raised in the consideration of the application.

In essence more information has been received using TRAVL data to provide a better understanding of the impact of the proposal on the area at the most sensitive times. The conclusion by the applicant from that further work is that the development will generate in the peak hours of traffic flows no more than a 1-2% in traffic growth which is considered to be insignificant. However, it is recognised that drivers may enter Water Lane looking for parking but this is considered to be less likely as visitors understand the position of other car parks, the use of signage for the those car parks and the banned right turn out of Wharf Lane which is likely to reduce entering the site via Water Lane.

Officers do not fully agree with the way the assessment has been undertaken but broadly agree with the conclusions that traffic generation will not reach such a level to cause demonstrable harm to traffic movements, although as the peak hour traffic is currently problematic additional movements will add to this harm. The eventual split of A1/A3 uses will affect the traffic generation to the town but even allowing for A3 uses throughout, as it is more likely to impact the area in the evening after rush hour periods, there should not be an overriding reason for withholding permission on traffic flow grounds.

However, work to the public highway would be required as a direct consequence of the development; namely the need to improve the enforcement of the banned right turn from Wharf Lane, and the need to carry out an environmentally sensitive traffic scheme at the meeting point of King Street, Church Street and Water Lane to provide a safe environment for pedestrians in particular. The first can be dealt with by a condition, the second would need to be the subject of a legal agreement.

Finally on this aspect the proposal will depend upon well designed and located signage in the town to encourage use of nearby public car parks and discourage vehicles entering Water Lane looking for parking spaces. The applicant has recognised this need and this would also be a part of a legal agreement to secure its provision.

**Proposed parking:** Proposal T1 seeks only limited parking in the scheme. Survey work, primarily using Council information/counts, has been undertaken and the applicant concludes that there is sufficient capacity in the Arragon and Holly Road car parks to cater for the development at different times of day. This is again based on using TRAVL data and extrapolating to produce figures to base decisions on. The applicant further advises that the development has not been designed to encourage traffic to it as no extra parking is provided on site for the leisure and commercial uses. It should be noted that the site is very much a town centre location in an area of

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mixed use with very good public transport links by bus and train during the day and evening.

*Car parking standards for the commercial elements generate upwards of 200 car spaces. However, this is a likely absolute maximum as it does not discount for drivers who use more than one activity; it assumes gross floor figures as a worst case scenario; it assumes full A3 uses across the whole site and no allowance is made for local foot movement and the reduced need for local residents to travel to existing facilities elsewhere.*

One space per flat is proposed, replacement private parking for that lost on the east side of Water Lane with on street parking including disabled spaces shown around the site. Several cycle stands are also included for new residents and users of the other facilities. The proposed flats' parking is a maximum provision and parking permits should not be issued other than for visitors. Officers will seek through negotiation to prevent the issue of such permits using the legal agreement as the proper mechanism for achieving this point.

Again officers do not agree with the figures produced to the extent that they consider that it is likely that there will be a greater need for evening parking spaces in particular, as suggested by the car parking standards, but it is recognised that there is sufficient capacity at night in the public car parks. However, Arragon Road car park currently closes at 9.00pm so there will be a need for that arrangement to be changed to cater for later evening activity. The Council is negotiating with the applicant over a contribution to the funding of these alterations as there are operating costs etc tied in with such a change and this is not unreasonable as its extended use would be as a direct result of the development. This will be dealt with through appropriate legal agreements.

Moreover, the route to Holly Road is recognised as in need of improvement, and it is considered reasonable to seek a contribution from the development for such limited environmental improvements and CCTV, as the evening economy is likely to increase which inevitably causes more activity and possible disturbance. This is quite common in town centres and can be a successful way of preventing such problems from arising. This will also be sought through a legally binding agreement.

**Existing parking:** The initial planning application drawings showed the possibility of substantially clearing the Embankment of parking and changing the location of the loading area at the bottom of Water Lane. Suggestions were put forward that Flood Lane car park could be given over to residents parking only, to make up for the possible loss of 31 spaces on the riverside. Non residents parking could be removed. However, the suggested use of the Civic Centre car park at night is unlikely to be achievable due to major resource and practical implications.

Subsequent to this the applicant has submitted an alternative layout to the Embankment showing improved loading areas for Eel Pie Island and more on street parking. It is also suggested that service vehicles could use the Embankment between controlled hours, to assist businesses but without eroding the objectives of improving the appearance and use of the riverside environs, in line with the various planning policies and supporting documents.

As stated above the exact answer to this remains to be considered at a future date and should not prejudice consideration of the current scheme but clearly the Local Planning Authority has to take into account the amenities of local residents and businesses when considering such later submissions.

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It is also considered necessary for the development to fund a future review of the traffic and parking around the site as the TIA has not been developed as fully as your officers would have expected. With implementation of the scheme a study should then be carried out to assess whether any further work is needed to resolve unforeseen conflicts. The legal agreement is suggested as the way forward on this aspect.

**Service road:** Proposal T1 requires the extension of the existing service road at the rear of King Street onto Water Lane and this is proposed. It is intended to serve both King Street properties as well the new development. It must also be able to cater for other traffic if the Embankment is eventually closed to through traffic, particularly HGVs.

Your officers have sought amendments and clarification from the applicant concerning road widths, radii, gradients and other detailed matters to ensure the facility will work given the limited space available. More information is required on this and it is accepted that the constraints of the site mean that there will be some compromise on gradients etc. The change in levels between Water Lane and the existing road is a difficult engineering challenge but the applicant's further information has helped to resolve points of potential conflict.

Your officers consider that if the dimensions of the existing service road are not materially narrowed then it is workable on a one way basis only. Conditions are suggested to ensure that this issue is properly considered when fuller details are provided.

**Pedestrian route from King Street:** This was criticised by the Inspector on the M&S application as being potentially dangerous for pedestrians crossing the service road. However, the current proposal seeks to overcome those harmful aspects by narrowing the road and introducing tactile paving or similar to emphasise pedestrian priority. Some of these factors were presented in 1991 but there are some material differences. For example there was likely to be much more traffic, both cars and HGVs using the service road on the M&S scheme, as there was a much larger car park proposed and a large food store that would have been likely to generate significantly more traffic than the current proposal. Moreover, the service road will be at right angles to the foot path with better sight lines compared to the angled approach on the previous refusal.

The introduction of the public route is considered to be very important to the whole scheme and it is considered that it is possible to reach a satisfactory solution without harm to highway safety and the appearance of the route through.

### **Impact on neighbours:**

There are several aspects to this which need to be considered. In summary the most affected neighbours are those in King Street above the shops, those on the opposite side of Water Lane and Wharf Lane and properties opposite on Eel Pie Island. However, a development of this size will no doubt also affect the wider community particularly in the evening period as the various attractions close for business.

The overall size of the buildings will mainly affect occupiers of the flats above King Street and the newer properties on Water Lane. With regard to the latter as the flats are at the upper level and there is some 30m distance between the properties this should not cause undue harm to existing amenities by way of overlooking, loss of light and intrusive impact. Moreover, if the large trees on the boundary are kept they will provide a softening of the development as seen from the existing flats. Whilst they



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may lose a view to the river the Planning system is not able to take this into account as no one is normally entitled to a private right of view across some one else's property.

Turning to the Water Lane properties the new build will be some 12.4m from their frontages. This is quite a tight relationship but is not uncommon in town centres, particularly where the historic development is of tight knit housing/shops served by narrow lanes. Moreover, the height of the proposal has been kept at a maximum of two storeys, 10m to eaves, to respect the amenities of those homes.

The small flatted more modern development in the grounds of Thames Eyot to the south-west is some 17m from the nearest part of the blocks and at an angle to them across a public highway. This should not create unneighbourliness to a material degree from either overlooking or visual intrusion.

Noise generated from the development is likely to be from the use of the A3 facilities, which could range from day-time cafes to restaurants, and patrons leaving the cinemas later into the evening. It must be remembered that this is effectively a town centre location and thus controlling hours of use should be less an issue for the Planning system. However, in this case there are residential properties on Eel Pie Island which with others could suffer harmful disturbance and therefore it would be appropriate to control hours of music and closing times for the A3 businesses. The applicant would be prepared to accept such conditions if considered necessary.

Finally, crowds leaving the cinemas and A3 uses in particular could be the cause of some noise in the town but it is unlikely to result in significant numbers as the cinemas are small and would be likely to close at different times to one another. The routes out of the complex would be up Wharf Lane, the new footpath and Water Lane. These are public roads and if the hours of closure are at midnight with music ceasing before that this seems a reasonable solution in such a location.

### **Trees and landscaping:**

There are two groups of trees, those on the Embankment and those on the bath site adjacent to the service road at the rear. It is accepted that the former need some surgery and the containers need to be rebuilt and the concept suggested by the applicant is a satisfactory one. Some smaller trees would be removed to ensure the longer term survival of the more mature ones which is to be welcomed.

With regard to the trees at the rear some have already died and the most important ones are the five Hornbeams, which provide an attractive back cloth to the site and partly screen the site from the top of Wharf Lane. The applicant's arboriculturalist considers that all these trees can survive the excavation work and flourish thereafter. Your officers take a less optimistic view and are of the opinion that some of the trees may be adversely affected during construction and will need fairly drastic tree surgery afterwards to avoid branches taking light from the new flats on the north side of the site. Reshaping of these hornbeams are likely to adversely impact their amenity value to such an extent that even if they do survive the work they will have lost intrinsic qualities. It has been suggested by officers that the tree at each end of the line be retained as there is more space around them and the others be removed and be replaced by advance nursery stock with a management agreement to maintain them for an agreed period in case of disease or damage. However, the applicant wishes for it to proceed on the stated basis of retention.

On any planning permission landscaping conditions could be imposed to ensure that this issue was dealt with in a satisfactory way by ensuring that if the tree(s) died

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within a five year timescale replacements would be provided to an agreed specification.

With regard to other landscaping one of the Environment Agency's suggestions that work could be carried out to the river wall by the introduction of timber balks which would create an ecological resource as the tide rises and falls and covers the timber is worth pursuing. However, the concept of breaking through the river wall to form reed beds etc., whilst of interest, does not appear to be the correct location for such proposals. It is in the heart of the town and is a former wharf area with a wide pedestrian route that should not be disrupted. Trees may also be harmed by this concept. Radnor Gardens, the ends of Eel Pie Island and Ham Lands can and do provide this form of nature conservation. It may be possible to create a planting area by the steps into the river opposite Water Lane and this can be explored with the applicant via the landscaping conditions.

The site has been examined for bat roosts by the Local Bat group and there is no evidence of habitation to effect the redevelopment of the site.

### **Archaeology:**

English Heritage has requested that if planning permission is granted it be conditioned to ensure archaeology is properly dealt with. The applicant has already appointed consultants to deal with this issue.

### **Education supplement:**

The scheme creates the need for an education contribution of £30,536 and the applicant is aware of and has agreed to pay the said sum.

### **Conclusions:**

There are certain general planning principles that need to be borne in mind in considering this application. First of all, the acceptability of the proposals is judged first and foremost against the planning policies and guidance set out in this report. This does not include non-planning matters such as the monetary value of the site that may accrue to the Council as a result of its land holding interest. Secondly, the Development Brief drawn up by the Council having the major land holding interest should not be confused with the aforementioned planning policies and guidance. Finally, as with any planning application, this proposal must be considered on its own merits against the planning policies, guidance, and any other material considerations, and not in comparison with other schemes or ideas for the site.

The following is a summary of conclusions on the main key issues:-Land use: The various proposed land uses are examined in the report and are considered to comply with the outline of the land use types stated in Proposal T1 of the UDP, the related Planning Brief issued as Supplementary Planning Guidance, and the emerging UDP first review. A prime objective of the T1 proposal is to provide a broad range of leisure activities for the community and increased opportunities to enjoy the riverside. As a matter of fact there will be leisure activities provided for the community resulting from the specific land uses proposed including the restaurants, cinema and health and fitness centre, (with pool). The applicant's proposal to make part of the cinema available for local arts group use at certain times and the pool for public use as specified will provide additional scope for leisure and recreational use by a broader spectrum of the community. Opportunities will also be created for out door uses and passive enjoyment of the area in the public walkways and areas. The increased numbers of people attracted to the site and its environs will also increase opportunities to enjoy the river.

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In connection with the river, the applicant has undertaken to explore the construction of a landing stage if practical and desirable. Residential units are proposed by the applicants and this provides an important element in the viability of the overall scheme. However, regardless of the matter of viability, housing is in compliance with the uses specified in proposal T1 and, in principle, is a benefit in terms of planning policy for housing.

Interested parties have expressed concern over the question of the community benefit arising from the scheme, but some of these make little or no reference to the Unitary Development Plan requirements. It should be understood that whilst opinions may well differ over the subjective matter of the degree of community benefit, the basic planning test in this regard is the extent to which the scheme complies with the Unitary Development Plan requirements and in particular those set out in proposal T1. Setting aside other considerations such as the visual and traffic impacts of the proposal, officers consider that the application does comply with the uses specified in the Unitary Development Plan and is therefore acceptable in principle in this respect.

### **Traffic and highway matters:**

The basic requirements of the UDP in terms of, improving the service road behind the King Street properties, using this as the primary vehicular access to the site, creating a new pedestrian link from King Street to the river, and provision of limited car parking only are included in the scheme. Subject to conditions regarding details of design and implementation these elements are considered by the Council's highway engineers to be satisfactory and would be carried out as part of the first phase of the development.

No specific requirements to pedestrianise or make other key highway alterations to the Embankment are made in Unitary Development Plan proposal T1. However, the closure of this road to through traffic is referred to in the planning brief with a view to ending its use as a car parking area, ( with the provision of 31 of its spaces elsewhere for the use of existing residents).

The proposition put forward by the applicants is that part or full closure of the Embankment is not necessary for the implementation of their scheme. However, they have proposed that a second phase of the development could involve this aspect subject to further work being carried out on the traffic and parking management measures, (some of which are outside the planning process). They have provided an indicative drawing showing one way in which further pedestrianisation could be achieved but this is indicative only and not submitted for approval at this stage. The applicants include the Embankment in their application site and confirm that a phase two as described would be a matter conditioned for future approval and provided as part of this development.

The above general proposition in respect of The Embankment is accepted in principle by officers but its final acceptability will be subject to detailed agreement being reached on a number of important matters. In particular, the satisfactory implementation of phase one with no change to the Embankment will depend on certain traffic management measures being put in place . These would include new signage around the town, review of CPZ , later opening of existing public car parks as well as physical alterations to highways outside the site to safely accommodate the additional traffic flows. Subject to these matters being agreed and any planning permission being made conditional upon them being implemented, the phase one of the proposal is considered to be acceptable.

Phase two, involving the changes and enhancements to the Embankment would, as indicated, need to be the subject of further work before being made the subject of a

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future submission. This future detailed planning submission would only be decided after full public consultation and would need to be considered at that stage on its own merits. Agreement to the principle of the enhancement of the Embankment at this stage in a form yet to be approved in detail but involving improvement to existing pedestrian use is consistent with the Unitary Development Plan objectives.

### **Scale and character of the development:**

The acceptability of this development in terms of its scale and character needs to be judged against the criteria and guide lines contained in the regional and local planning policy, proposal T1, the previous appeal decision and the other relevant planning documents referred to in more detail in the body of this report. A recurring theme in all these may be summarised as stated in proposal T1; the need for the development to be in harmony with the small scale and domestic aspects of the conservation area which gives it its distinctive character.

In response to criticism that their development does not accord with the above principle the applicants submitted a detailed appraisal of the scheme in this context. They argue that the development would not be prominently seen from oblique longer views up and down the river away from the immediate locality of the site, and that there are already existing nearby buildings larger than the smaller domestic scale of parts of the conservation area, (e.g. Thames Eyot flats) which form part of the overall character of the area. In terms of the nearer views and visual impact, it is further argued that although the highest parts of the buildings rise to 15 metres above the Embankment the detailed design of these elements lightens the potential impact of this height and the scheme overall has sufficient variety in building line, form and layout to avoid being over dominant or out of character. In this connection a contrast is drawn to both the existing pool building and the previously refused Marks and Spencer scheme which are more monolithic in form, albeit lower.

Although officers do not agree with the detail of all the arguments made, it is considered that the general points made by the applicants do have some validity and should be carefully taken into account. However, the fact that a significant proportion of the development, including parts coming closest to the river, is of a scale which exceeds the majority of existing development along the Twickenham town centre riverside area also clearly needs to be considered. Officers do not object to the principle of a unified design approach to the site as a whole and had always envisaged that there could be parts of this site that could reasonably exceed the scale of the smaller buildings which prevail nearby without harming the overall character of the area. The extent to which a scheme with this design approach can reasonably exceed this scale without being out of harmony with the distinctive character of this part of the conservation area is ultimately a matter of judgement and remains the prime concern of officers. This judgement should be made in the context of the planning policies, guidance and documents referred to and, in view of their conclusions on the other key issues, officers considered this to be the main point of consideration upon which members should focus in assessing the acceptability of the scheme.

Arising from the above conclusions officers consider the main issue affecting the acceptability of the proposed scheme is that of how its scale and character would affect the special qualities of the Twickenham Riverside Conservation Area. If the Development Control Committee considers that the proposal is acceptable in this regard, officers recommend that permission should be granted subject to the conditions, and obligations binding upon the applicant in a legal agreement, set out below. If the Committee considers the proposal would fail to preserve or enhance the character of the conservation area and that this special consideration is not

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outweighed by the benefits of the scheme, it is recommended that permission should be refused for this reason.

*A* **Members are requested to consider the application as described above and decide whether or not to approve it:**

If the application is to be approved it should be subject to the satisfactory completion of a Section 106 agreement or such other appropriately legally binding agreement to secure the provision of education supplement, funding for further traffic studies, environmental improvements as described in the report, signage, CCTV, Arragon Road car park monies, restriction on the issuing of car parking permits to new residents, further studies into the pontoon proposal and subject thereto authorise the Development Control Manager to grant planning permission under delegated powers subject to the conditions and informatives listed below ;

### **Standard conditions:**

- BD12 - Details to be approved
- CP03A - Acquisition of whole site required
- DS01A - Mobility housing
- DS02 - Wheelchair housing
- DV10 - No structure on roof/face of building
- DV14 - Restriction on storage-within building only
- DV18A - Refuse arrangements
- DV23 - Floodlighting
- DV28 - External illumination
- DV30 - Refuse storage
- DV33A - No reduction in dwelling units
- DV40 - Green Transport Plan
- LA04A - Protect trees-shown on plan
- LA08 - Protect major roots and site inspection - 'Hornbeam'
- LA11A - Landscaping require-hard and soft
- LA30 - Landscape works-implementation
- LA33 - Landscape management plan-large schemes
- LB12A - Archaeology
- NO06A - Noise-plant and machinery
- PK02A - Parking/loading/turning construction - 'basement parking, extended access road, loading area, disabled parking (on the development site)' 'P/0010/2.103,104 received 4 October 2001 and P/0010/2.008 received on 6 February 2002'
- PK05 - Mixed use building '19' 'business uses'
- RD01A - Details of extended road
- RD08A - Restricted access and signs - 'extended road' 'Water Lane' 'Wharf Lane'
- RS01AU- Restricted hours/notice-all week - delete 'premises' and insert 'A3 uses' 'A Mon-Sat = 8am-midnight; B Sun = 8am-11pm'
- RS03 - Restriction playing musical instruments - '8am-11pm'
- RS04 - Extraction equipment for restaurants
- RS05 - Restricting air conditioning
- SH04 - Details of shopfronts
- SH05A - Door design - disabled access

### **Non-standard conditions:**

- NS01 - Prior to the occupation of any part of the development hereby approved highways works shall be carried out in accordance with details to be submitted to and approved in writing by the Local Planning Authority; such details to prevent the right turn from Wharf Lane into King Street at any time. REASON; to ensure a safe form of development to users of the new facilities and other users of the highways.

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- NS02 - Prior to the occupation of any of the A1/A3 accommodation, details shall be submitted to and be approved by the Local Planning Authority; such details to show the size and use of the units hereby approved. REASON: to ensure the development does not cause unacceptable traffic movements and to ensure such facilities are compatible with the retail function of the town.
- NS03 - Prior to the commencement of any part of the development hereby approved a plan showing how the development is to be phased shall be submitted to and be approved by the Local Planning Authority to demonstrate how and when the development, including the new access from King Street, and the environmental work to the Embankment, Water Lane, Wharf Lane, including the grassed area at the end of Water Lane, the river wall and steps into the river, will be carried out. The plan must show all aspects of the timing for the development including details of car parking, loading areas, surface finishes and landscaping and the time scales to achieve implementation of the work. The development shall then be carried out in accordance with that plan. REASON: To ensure a satisfactory form of development in accordance with the Unitary Development Plan and to comply with the terms of the application.
- NS04 - That the swimming pool shall be available for non members of the Health Club between the hours of 10am-midday and 2pm-5pm weekdays and between 2pm-5pm on one afternoon of every week end, and that for not less than 14 weeks in any calendar year one of the auditoriums shall be available as a community arts centre. REASON: To comply with the terms of the application and to provide a wide range of leisure facilities in accordance with the Unitary Development Plan.
- NS05 - No building or raising of ground levels shall take place on that part of the site lying within the area of land liable to flood. ~~There shall be no net loss of storage volume on the site but if any is to be displaced, compensation measures will need to be agreed in writing with the Local Planning Authority and implemented as part of the development hereby approved.~~ REASON: To prevent the increased risk of flooding due to impedence of flood flows and reduction of flood storage capacity.
- NS06 - Any openings (including access to car parks and basement) or air vents to the buildings must be kept above the flood defence level of 6.02m. REASON: To prevent the increased risk of flooding

*Understand compensation measures to ensure no loss of storage volume on the site*

**Standard informatives:**

*has been agreed in writing with the LPA & be implemented as part of the development hereby approved.*

- IE02 - External ducting
- IE03 - Restaurants - EHO consultation
- IE05 - Noise control - building sites
- IH01 - New street - highways approval;
- IH06 - Damage to public highway
- IL12 - Approved drawing Nos - '0010/2 - 002, 003, 006, 007, 100, 101, 102, 103, 104, 106, 107, 108, 109, 110, 111, 112, 120, 121, 122, 126, 127, 130, 131, 140 and 141 received on 28 September 2001 and 0010/2 - 001 A, 005 D, 008, 0010, 0011, 0012, 0013, 0014, 105 A and 125 A received on 6 February.'
- IL13 - Section 106 ~~only~~
- IM01 - Disabled persons
- IM10 - Street numbers - shops
- IM12 - Graffiti
- IT06 - Nature conservation - Add 'The Local Planning Authority confirms that landscaping details pursuant to condition LA11A should include works to the river wall and the steps at the end of Water Lane dropping into the river. You are recommended to design these works taking into account the Environment Agency's written comments with regard to enhancing the nature conservation value of the area.'
- IX03 - Thames Water - soil and surface water drainage
- IX06 - River flooding - The Environment Agency

*check information day. No - 22-2-02 Part of 9/01*

*L 123A rec'd 22-2-02  
015, 016, 017 & 018*

*0011*

6-3

**Non-standard informatives:**

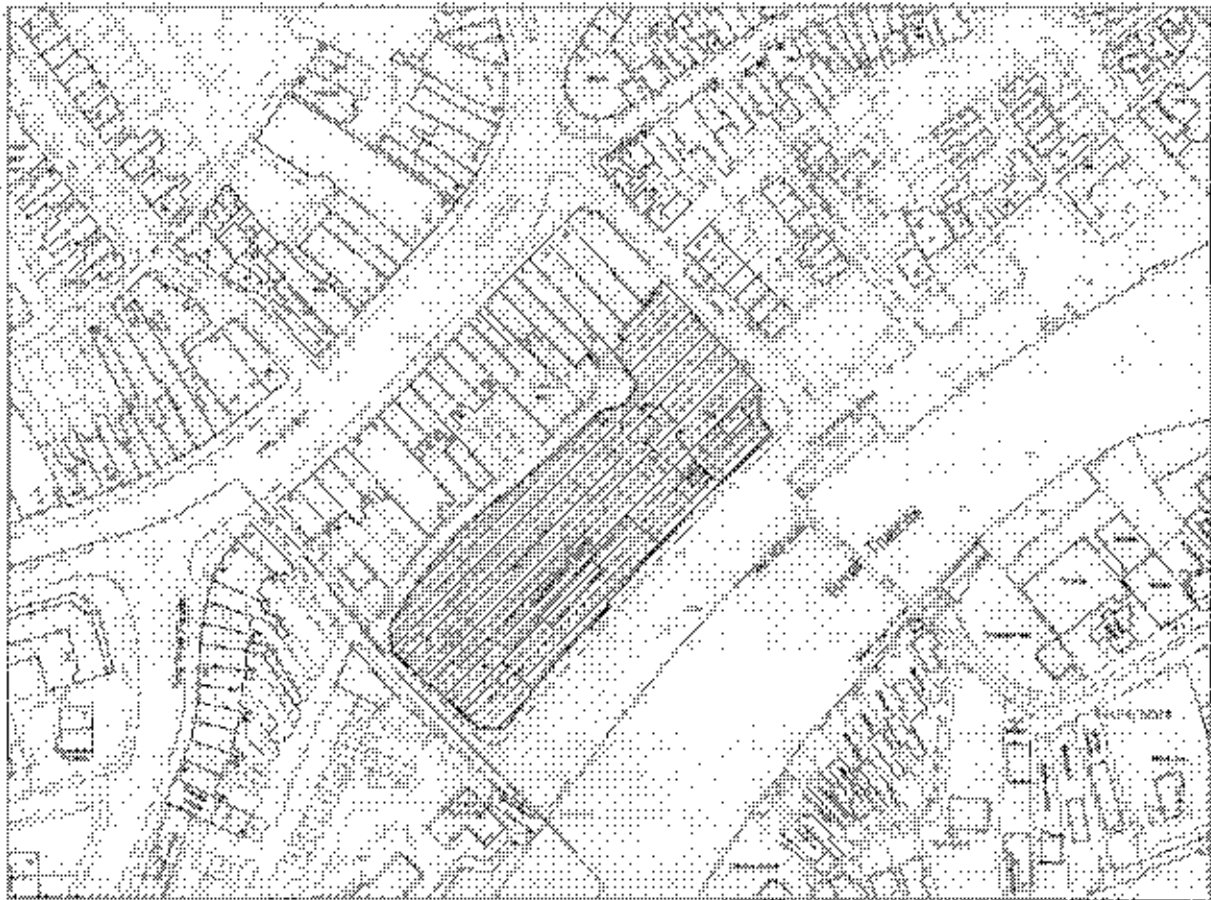
**NI01** - The planning permission hereby granted in no way implies approval under any other legislation, for example under the Highways Act, for the full or part closure of the Embankment nor to the stopping up of those parts of the public highway shown to be built on.

**Background papers:**

Application forms, drawings, design report supporting planning application.  
Transport assessment, supplementary planning statement and traffic impact and parking assessment.  
Letters of representation including all amenity groups etc.  
Letters from English Heritage, C.A.B.E., Thames Water, Environment Agency, Port of London, CAAG minute.  
Previous applications (refs: 90/1213/FUL (inspectors decision only), 01/0540/FUL)  
Thames Landscape Strategy, Twickenham Riverside Conservation Area Study, Twickenham Riverside Development - Final Revised Development Brief (Rev B) October 2000

**01/2553/CAC**  
**FORMER SWIMMING BATHS SITE**  
**THE EMBANKMENT**  
**TWICKENHAM**

**CENTRAL TWICKENHAM WARD**  
**Contact Officer:**  
**E Langmaid x7385**



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**Proposal:** Demolition of swimming pool and ancillary buildings and walls, public WC and electrical sub-station.

## DEVELOPMENT CONTROL COMMITTEE - 28 FEBRUARY 2002

**Applicant:** MacCormac Jamieson Prichard for DDSF Limited

**Application received:** 28 September 2001

**Main development plan policies:**

UDP ENV 1, 10 and 43; UDP - First Review BLT 2 and 9, ENV 26; CA8; CAAC; Proposal site T1 Twickenham Pool; Thames Policy Area; Proposed Area for Environmental Improvements

**Present use:** Former swimming baths and ancillary buildings

**Site, history and proposal:** This application is related to application 01/2584/FUL which is considered in the preceding report on this agenda. The site description and history are the same as for that report.

This application proposes the demolition of the swimming pool and ancillary buildings and walls, public conveniences and electrical sub-station.

**Public and other representations:**

**English Heritage (Archaeology)** request that a condition be attached to protect the archaeological potential of the site.

Four letters have been received specifically relating to this application objecting on the following grounds:-

1. This proposal takes no account of the architectural quality of the buildings, even though they are prime examples of 1920s art deco concrete structures of which very few remain extant. It is essential these buildings are examined and appraised architecturally before any demolition is contemplated.
2. The Unitary Development Plan comments that the banks of the River Thames in the locality are a 'prime ecological area'. It would be irresponsible to consider any commercial demolition on this site before an archaeological survey has been completed.
3. Contained with the associated planning application 01/2584/FUL there is a report by WS Atkins which includes an assessment of the ecology of the site. This indicates the presence of significant species including bats, amphibians and slow worms. It is most probable that these would all be lost if demolition were to proceed.
4. Planning consent has been given for a development of the site that makes use of some of the old swimming pool buildings, and it seems wrong that the Council should seek to remove the buildings at this stage.

**Professional comments:** Consideration of this application revolves around the architectural and/or historic value of the existing buildings on site and their contribution to the Twickenham Riverside Conservation Area and its environs. The Inspector, in his report on the 1991 Marks and Spencer application, noted that the existing buildings represent an alien feature in the conservation area .

I consider that the existing buildings do not make any significant contribution to the conservation area and subject to an acceptable form of development being approved, demolition of the swimming baths and ancillary buildings could occur.

Notwithstanding the recommendation on the main planning application, it is open to members to approve the demolition of the buildings, irrespective of whether planning permission is in place for redevelopment, if it is considered that they do not preserve or enhance the locality.

However, I am recommending a condition that ensures that no demolition takes place other than that required to implement a planning permission. This will ensure that there are no unsightly



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gaps in the streetscene, that a programme of archaeological survey can be carried out and to enable flood defence matters to be dealt with.

I therefore recommend **PERMISSION**, subject to the following conditions and informatives.

### **Standard conditions:**

- AC05 - Commencement of works (CAC)
- LB02 - Retention buildings development commences –‘which lies within a Conservation Area. In addition this will ensure that a programme of archaeological survey can be carried out and will enable flood defence matters to be properly considered’

### **Standard informatives:**

- IE05 - Noise control - building sites
- IH06 - Damage to public highway
- IL05 - Decision drawing numbers - 'P/0010/2.003 and 004 received on 28 September 2001'
- IL16 - Relevant policies and proposals 'ENV 2, 10 and 16, RIV 1, STG 2' 'BLT 2, ENV 4, 18 and 26, STG 2; '

### **Background papers:**

Application forms and drawings  
Letters of representation  
English Heritage letter

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# APPENDIX A

## PART III : CONSIDERATION

*In spite of boring submerged in London's growth, the riverside places have kept their own identity very well. Hardly any of them exploit the river, yet they are all affected by it, in completely different ways ... It is a tip-and-run technique, very English, the opposite of the long quaffs along the Seine in the western suburbs of Paris: the best example is Twickenham. Perhaps because it is never fully displayed, this comparatively puny river has an effect far beyond its size. Far more could be done to accentuate the differences, and multiply places as enchanting and absurd as Eel Pie Island. Nairn's London (1966)*

### 11 CONCLUSIONS

- 11.1 The assessment of the character of an area such as Twickenham depends on qualities that are not immediately apparent, are elusive when glimpsed, and extremely difficult to describe in formal prose. I have placed at the head of my conclusions an extract from a master of this genre of writing, Ian Nairn, whose work was quoted at some length by Mr Plummer [9.35]. Several contributors to the inquiry referred to the progression of view and impression to be gained in approaching Twickenham from Richmond; my own perambulation along the tow-path, as part of my accompanied alto visit, convinced me that the application site could not be looked at almost in isolation either within the Twickenham Riverside Conservation Area [3.6] or in the context of the area of special character which embraces this part of the river [3.7].
- 11.2 The site really is a small part of a landscape strip, as indeed is recognized by the designation of this stretch of the Thames as an area of special character, which has an interruption at the south-west side of Wharf Lane, but even at Thames Eyot there is the continuation of the open riverside character of The Embankment, albeit in private occupation, and the quality which I shall seek to define overarches three and other private grounds which reach down to the river to find public ground again in Radnor Gardens. To suggest, as the case for the applicants and the council demands, that the site is divorced in some significant way from the greater landscape strip, that is, that there is a significant division at Water Lane, for example, is to underestimate its importance and to misunderstand the informal qualities of the English landscape in combination with the river Thames. A more cogent analysis of the site and its relationship to its surroundings was made by many others, for example by the EPIA [7.25-7.27] and by Professor Sir John Hale [9.10].
- 11.3 In these conclusions I shall, taking into account the evidence given and the submissions made at the inquiry as well as those in writing, deal with the several issues raised. These issues are: the significance of the site in the context of the town centre, of the conservation area and of the area of special character, to which I have already referred; the effect of the proposed development on the character and appearance of its surroundings and of the wider context, which includes an assessment of the architectural qualities of the proposal; the effect of the development on the traffic and conditions for the pedestrian; the effect of the development on the shopping centre of Twickenham; and the benefits of the proposed development. There was much discussion about the long history of

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1. References in square brackets are to paragraphs relied on in reaching my conclusions: references are not generally given for my own observations.

attempts to put the site to use, since the closure of the Baths in 1980, and of the consultations carried out by the council; these are relevant insofar as they might persuade me to recommend a scheme for lack of any more acceptable proposal in eleven years, but I do not propose to disentangle the interpretations put upon these consultations and negotiations for the development of the site.

*The significance of the site*

- 11.4 The developed part of the site is, on the face of it, undistinguished, with the large building of the Baths on its frontage masking the open-air pool, and smaller ancillary buildings on the north-eastern part. Being close to the town centre, it lies at the interface between the shopping centre of Twickenham and the riverside. However, since the site is separated from the shops themselves by the unbroken range of buildings in King Street, its development might have little effect on the shopping centres unless positive steps are taken to link it, as indeed is proposed with the new pedestrian link; even then, its significance visually to the shopping centre is slight. On the other hand, the site is an integral part of the riverside scene, and anything which happens on it will vitally affect the character of that scene.
- 11.5 The site is not, as claimed by Marks & Spencer [5.3], 'backland'. That term applies properly to the rear of the premises in King Street, where there is a variety of structures abutting the existing service road; this would, undoubtedly, be improved visually, perhaps also functionally if the use of the service road were increased in line with the council's intentions for it. To call it backland would be to imply, wrongly in my view, that the primary function, purpose and means of access are orientated towards the King Street frontage. It is not, functionally, a part of the shopping centre, although clearly it could become so.
- 11.6 In the context of the river, the site is seen, or, if not wholly seen, is glimpsed from many places, as part of the continuous landscape of the enclosure of the winding river. In summer especially, trees on the Embankment tend to conceal its buildings from a distance, but the site is also part of the experience of moving along the edge of the river, whether by boat or on land: a building not clearly seen at a distance becomes part of the scene on a closer approach, and therefore it is not simply its relationship to its immediate neighbours, riverward or landward, to north-east or south-west, that is significant. It will be sensed, appreciated and judged in the context of the changing scene presented to the beholder.
- 11.7 The site lies on the outside of a bend in the river and is thus thrown into some additional prominence. It comes at a point where the landscape strip is at its narrowest, and therefore at its most fragile, where the domestic character and the scale of the villa, to which Mr Gascoigne referred [9.18], have been most severely eroded by the building prior to the war, of Thames Eyot and the Baths. The domestic character which otherwise predominates in the landscape strip is not to be mistaken for the residential use of, for example, a block of flats; it is the domestic character of the individual house, whether the grand mansion or Marble Hill House or the terraced houses of Sion Row or the modest cottages facing The Embankment and Bell Lane. Upstream from Thames Eyot, the domestic character of the individual house picks up again, although its most notable example, Pope's Villa, no longer exists. This is the context in which the proposal needs to be judged,

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in order to pay regards to the area of special character as well, as to the conservation area.

- 11.8 The present main building on the site tends to dominate the riverside, but because it is a building of little depth on the frontage, its impact is much reduced by the glimpses of the inner open area over, or through, the fence, and between the main and ancillary buildings, which themselves are lower; in addition, its façade (doc 55), with wings to the slightly raised centrepiece, is on two storeys, albeit larger than domestic in scale. Trees on the rear of the Baths area are seen to mark the edge of an open area enclosed behind the fence; some of these can be seen over the Baths building from Eel Pie Island. Thus, while coverage of the site with the pool and main and ancillary buildings is almost complete, the apparent and effective site coverage is quite low.
- 11.9 The forward, public, part of the site is more obviously continuous with The Embankment further to the north-east, beyond the bridge to Eel Pie Island, and is in no sense an isolatable element of The Embankment. It gives the appearance of being less well used now, which is attributable largely to the fact that the Baths building is not in use, and therefore there is little to attract the pedestrian other than the promenade along the river to the south-western boundary wall, where he has the choice of returning along The Embankment or ascending Wharf Lane. The whole length of The Embankment within the site is used for parking vehicles under parking control, and for the occupiers of Eel Pie Island it is the only easily accessible parking place. By contrast with areas to the north-east, there are no small open spaces behind the line of The Embankment walk which the public may use.
- 11.10 The buildings on the site thus stand between the shopping centre and the riverside. The site is isolated from King Street by a continuous range of building and the service road, which is comparatively little used because of the difficulties of manoeuvring large vehicles, and is related to the riverside. Though partly occupied by buildings which do not conform with the characteristics of those to the north-east or to the broader domestic scale of the landscape strip which I have identified, it is an integral part of the conservation area, of which the river and its enclosure are the principal components, and of the area of special character. A new building on the site should not echo the non-conformity of the Baths building.

*The effect of the proposed development on character and appearance*

- 11.11 The applicants and the council are satisfied that the buildings would be appropriate and would enhance the conservation area [5.22. 5.72]. In my assessment of this matter I have been greatly assisted by the thorough professional appraisals of the scheme by others, especially by Mr Double for the EPIA [7.30-7.32], by Mr Beckles Wilson (doc 64, pp 3-10) and by Mr Plummer [9.36-9.38: dot 69, pp 2-9].
- 11.12 The proposal would, in my view, have a very seriously harmful effect on the character and appearance of the conservation area and the area of special character. My comments are related to the mass of the building, the introduction of a large shopping-centre use, the dominance of the roads leading to The Embankment by provision for vehicles and generally the design of the building. The

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architects have been ingenious in accommodating such disparate uses, but have not resolved a major conflict between pedestrians and vehicles. which I will deal with under traffic but which also has consequences for the appearance of the area.

- 11.13 Almost half of the site of the Baths would be occupied by a single mass of building, comprising the foodstore (1.969 sq m gross [2.2] and the flats. The flats, as a veneer facing the river, would tend to mask the bulk from views and from pedestrians immediately opposite the block, but it seems to me that the attempt to disguise a large structure, incorporating a large use, on the site is not successful. Users of the foodstore, of the new courtyard, of Wharf Lane, of the service road, and of The Embankment, would all be aware of the extent of ground cover of this block. which is not, in my view, comparable in impact with the extent of an open-air swimming pool and Baths buildings occupying a similar, or even a larger, area of ground. The flats face the river, but have no access in that direction, are raised above flood level, and are on three storeys. Though smaller in scale than the Baths building, they would be at least as tall, and would actually have a more obtrusive presence on The Embankment.
- 11.14 The imposition of a major shopping use (whether it is called a supermarket or a foodstore makes little difference) would extend the shopping center substantially beyond its present confines on King Street and the river, instead of being a single shopping frontage. This would be reinforced by the erection of a number of small shop units on the backland of King Street shops and on the main site.
- 11.15 In order to service the buildings both on and off the site, and to provide surface and underground parking, Water Lane would be used for access and, Wharf Lane for egress. Both would need wide sweeps into and out of the service road to accommodate the largest service vehicles, and would have entrance and exit ramps almost adjoining them, and rows of surface-parked vehicles, as elements of their appearance. The dominance of vehicular activity and parking provision in Water Lane and Wharf Lane, in combination with the wide new flank wall to the foodstore at one end, with its refuse store, loading bay and escape stairs, and the row of public convenience doors at the other, would make the lanes at best unattractive, at worst unpleasant, both to walk down to The Embankment and to look at. Wharf Lane especially, a rather neglected finale to the walk along The Embankment, needs improvement, not further degradation.
- 11.16 The design of the buildings appears to me to have no relationship with its surroundings, except with a coarse and incongruous post-war building on the corner of King Street and Water Lane. There are many indifferent buildings in the vicinity, but the most significant feature of virtually every building, good or bad, inside and outside the conservation area, is the presence of a pitched roof. Its absence on a small scale could be acceptable, but nothing marks out the present design more clearly as alien to the area than the flat roofs on all buildings; this is mitigated to a very small degree by the 'sail-like' forms or saw-tooth pattern of roof on the flats, where they are related to the scale of the individual units. Flat roofs have been used successfully in some riverside or nautical situations, but that does not, I consider, make them, particularly reminiscent of such situations or particularly apt for the present situation. One of the concerns expressed about the design was the likelihood of roof plant and pipe work; these would be subject to condition, but

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might still be inevitable, and are more easily controlled by incorporation in more traditional roof forms.

- 11.17 While the flats would have a splendid view towards the river and Eel Pie Island, there is little direct contact between the development and the river. The new courtyard, kept at the level of King Street, would be linked to the river by steps and a three-stage ramp, at the outer edge of the building site. Views through to the river would be obstructed or confused by the two canopies which cross the small square. While providing a partly finalised open space some 15m square, the courtyard is, in my view, too small, too busy and too random to be successful as a new public space, and, though small, it lacks intimacy because of the nature of the commercial enclosure. Moreover, it would not even provide a suitable entrance for the YMCA, with its main door set back, and next to the kitchen door; visitors who did not arrive on foot might have to be set down on the pedestrian link or on the service road and approach it through a mean side door.
- 11.18 The building appears to have drawn on several sources of inspiration. Amongst these are echoes of the architecture of the: Bauhaus of the 1920s and 1930s, but without its discipline or conviction, in its large plain rectangular forms and flat roofs. The flats are reminiscent of low slab blocks of the 1950s and 1960s, with a fussiness which fits ill with the large scale of the major components of the development. I find myself compelled to agree with those who saw the design as boring, poorly related in its parts, alien to its situation, and quite unacceptable in this important location.

#### *The effect on traffic and pedestrians*

- 11.19 There are three matters to deal with, the service road, the effect on the traffic in other streets, and parking provision. The service road, with entrance from Water Lane and egress into Wharf Lane, is the key to the functioning of the scheme; it would be 5.5m wide to the north-east of the pedestrian link, and 4.1 m wide to the south-west [5.84], without any footway. It would serve a multiplicity of purposes, servicing the YMCA and Barks & Spencer, servicing of the King Street shops, and car parking; parking at the north-east end would be replacement for lost surface parking for King Street premises, and that at the south-western end would be for the development. The applicants estimate that some 50 service vehicles a day would use the road, some seven of them for the foodstore [5.34].
- 11.20 It seems to me that there would be considerable scope for confusion over the use and role of the service road. If, as the council intends [5.32], rear servicing is provided for King Street properties, there would be a multiplicity of standing spaces or entrances for vehicles. The new loading bay on the north-west side would apparently be just adequate, as shown by drawing [doc 31], but poses the problem of vehicles waiting to enter while another is in the bay, while car users wished to enter. The service road is said to be wide enough on the north-eastern section [5.33], but the narrower portion also could have waiting servicing vehicles, vehicles moving along and car drivers wanting to park or leave.
- 11.21 The service road, in my view, benders on being inadequate for its job, but this might not be unacceptable if it did not also cross the new main pedestrian link

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between King Street and the courtyard. The crossing point would be distinguished by three features, different surface materials, ramps up to the pedestrian paving and down to the service road again, and bollards. The service road would cross the pedestrian link at a skew angle. It was suggested that most servicing would be outside the core shopping period [5.34], but I do not see how the arrivals and departures of service vehicles to King Street shops and the users of car-parking spaces can be so restricted. In any case, whether or not the service road is used frequently, the potential for uncertainty and accidents, especially with prams, children, elderly people, and animals, seems to me to be an entirely unsatisfactory and unacceptable feature of a major new scheme; although the onus might be on the users of vehicles, the pedestrian would not expect vehicles, especially articulated lorries, in an environment apparently designed for and dedicated to the pedestrian.

- 11.22 With regard to traffic in King Street, the applicants asserted that there was more than enough capacity to cope with the additional traffic generated by the development [5.37]. There was no quantified challenge to this, but it seems to me that the already congested state [7.54] is likely to be made worse. I am concerned the use of Wharf Lane by large vehicles leaving the service road would make necessary the installation of an extra set of lights a very short distance from those (in their new position) controlling the junction with Cross Deep. The shape of the junction of Wharf Lane and King Street would make a large vehicle swing out across all three lanes in turning left and it could be left in the wrong position for a further left turn into Cross Deep. Water Lane and Wharf Lane would, according to the applicants be within their capacities [5.38]. A large number of other traffic management changes and additions would be required and would be carried out as part of the development.
- 11.23 Parking provision was one of the most contentious issues. The EPIA pointed out that the provision of parking on the site was well below the council's own standards, although the 1989 site brief had called for provision in accordance with approved standards [7.54]; with a requirement for 191 additional spaces locally [7.41], and a net gain of 29 spaces until the Water Lane car park is developed, and a net loss of 2 thereafter [7.37], EPIA put the overall net increase in demand compared with supply at 162 or 205 spaces [7.42]. There is no specific provision for the new residents of the flats on the site.
- 11.24 According to the council and the applicants, the provision of parking should be considered for the town centre as a whole, and there was ample spare capacity in the Holly Road and Arragon Road car parks [5.39, 5.40]; the council was anxious not to provide too much parking. It was said that Marks & Spencer's foodstore was not like a supermarket: more of its customers came on foot and shopped with a basket rather than with a trolley, so that they came and went through the town centre doing other shopping [5.40]. Precautions would be taken with variable message signals to prevent drivers arriving when the underground car park was full [5.41]; EPIA pointed out that these signals were not accurate enough for the control of short-term parking (7.45).
- 11.25 It is evident that the site cannot provide, and has not been designed to provide, all its parking requirements. To do so would have posed even greater problems of

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parking accommodation than there is now, with numerous areas of parking distributed around the perimeter of the site, effective perhaps technically, but most unfortunate visually: I find the reliance on the Arragon Road car park, some 400m distant from the site, somewhat dubious as a means of supplying the deficiency. That the site needs so much more parking than would be provided is one of several indications that the proposal is an overdevelopment of the site.

#### *The effect on the shopping centre*

- 11.26 It was claimed by the applicants and by the council that the opening of Marks & Spencer would draw back trade from other centres, such as Richmond and Kingston, and would thus benefit the traders in Twickenham [5.4]. This was supported by the representative of the Twickenham and District Chamber of Commerce at the inquiry [ 6.1] and by a number of letters from individual traders [doc 6, 7 ]. Some fears were expressed that the consequence would be an increase in rent and that some shops would be forced to close, but these are not in themselves planning matters unless it can be shown, as it cannot here, that they would be damaging to the vitality and viability of the town centre. Many individuals and groups would welcome Marks Spencer in Twickenham, though not on the application site. The trade which would return to Twickenham was not quantified, and it must remain a matter of speculation, but I accept the view that there would be a beneficial effect on the trade in Twickenham from the opening of, a Marks & Spencer foodstore.

#### *The benefits of the development*

- 11.27 The applicants and the council referred to the numerous attempts which had been made to find a viable use for the site to implement Project T3 of the Local Plan [5.60 ff], which is mainly concerned with the present application site. Since none had been viable it had become evident that an enabling development would have to be accepted in order to get the site put to use [5.63]. The Marks & Spencer proposal would at last secure the redevelopment of the site which had been empty for ten years, and, in their view, provide many other benefits for the public, including the YMCA, the flats, public open space, the new public conveniences, rear servicing, and the implementation of road proposals, all to be paid for by Marks & Spencer [ 5.46]. In addition, there would be environmental and traffic problems to The Embankment [5.36, 5.46]. The site as it is now was seen as an eyesore, and a waste of a valuable asset [5.66, 5.79].
- 11.28 Many objectors to the scheme, while accepting that the site should not remain as it was, thought it better to clear the site and lay it out as an open space until money was available for a more substantial scheme. The present development would preclude a more suitable scheme, without a large retail element, and a more sympathetically designed scheme, at some time in the future by taking a short term gain; the YMCA was now, in the *view* of several objectors, a real 'community centre', and was little benefit to *the* community when there were on the site now several community uses.
- 11.29 With regard to the YMCA, by far the largest single element of the development which was claimed as a benefit, I was impressed on my visit to the Kingston YMCA

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by several matters. The premises were run to a very high standard and were very smartly appointed. I was particularly struck by the high proportion of the premises which appeared to be given over to fitness training; the programmes [doc 18, 96] seem to me to indicate that organized entertainment also plays a large part in the programme. While it seems to me that these may attract a large number of people, they are not primarily a community use in conventional parlance. I was told that similar facilities were available elsewhere in the borough [8.2, 8.3] and that there was a significant proportion who would travel to the YMCA; there are other restaurants, and other meeting facilities.

- 11.30 I have no doubt that all the facilities would be provided to an excellent standard, but I am not convinced that the sum total of the YMCA should be rated so highly as a public benefit in justifying the use of nearly half the site for a commercial retail purposes which does not conform with the terms of Project T3 and which I find inappropriate as a use. I do not regard shopping for food as a 'leisure activity' [5.49], at any rate to such an extent that it could be brought within the scope of Project T3. That the site should lie within an area of 'mixed use' [3.4] does not in itself justify going outside the approved Local Plan, nor do I see the Local Plan as out of date in this matter.
- 11.31 All of the other elements of the proposed development fall within the scope of Project T3 of the approved Local Plan [5.49]. Land-use proposals on the lines of the present scheme are being included in the Unitary Development Plan [7.14]. The review is now taking place, but the Plan itself can carry no weight at present: it had not been published at the time of the inquiry, has not reached any stage set out in Circular 22/84, and it might take 3-3<sup>1/2</sup> years to gaining approval [5.54].
- 11.32 Small flats, a public open space, and new public conveniences would be provided, but the flats appear to suffer from many drawbacks [7.16], the open space would be small, and the new public conveniences would be located in a particularly prominent position. I do not regard they achievement of these as having great weight.
- 11.33 While the placing of Marks b Spencer on this stile would have some effect in drawing trader to other stores as well, thus benefitting traders and shoppers generally. I am not convinced that the shopping centre is in such a parlous state that the new store should be built now on this site. The applicants claimed that the centre was declining [5.48], but their own consultants' fire had not long before produced a study of the town centre for the council which showed that it was 'generally healthy' [5.55], and another firm of consultants had also reported favourably [7.18]. Marks & Spencer stated that if planning permission were not given for this site they would continue their search [5.56].
- 11.34 The traffic management scheme would bring benefits to the town centre. However, it seems to me that significant elements of these have primarily the proposed development in view and would become more necessary if it were carried out.

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*The community groups on the site*

- 11.35 The Riverside Playgroup and HANDS occupy premises on the site [8.1, 8.7]. Any comprehensive development of the site will make necessary the relocation of these community groups, whose work is of great value to the community. Both are most concerned at the prospect of leaving what they see as most suitable accommodation and at the disruption which would be caused by their removal. to other premises: Discussions have been held with the YMCA; it has transpired that the Riverside Playgroup could not be accommodated in the YMCA [5.75, 8.5]. Bearing in mind that the groups have been permitted by the council to use the premises on a temporary basis, that the council has committed itself to finding suitably permanent accommodation, and that the site is allocated for development as Project T3 of the Local Plan. I do not think that their objections constitute a valid objection to the proposed development of the site.

*General conclusions*

- 11.36 I have come to the conclusion that the proposal would have the most serious effect, on the character and appearance of the conservation area and on the area of special character, both because of the building proposed and because of the most significant use proposed. It would introduce a major retail use, bringing the character of a commercial shopping centre, at present delimited by King Street, three-quarters of the way from King Street towards the river, negating its relationship with the riverside. The larger building would be massive without being tall, at odds with the small scale and domestic aspects of the parts of the conservation area which give it its distinctive character, and of a design which is, in my view, alien in this location, and redolent of the clichés of buildings of earlier periods without making a group or composition of quality in its own right.
- 11.37 Many of the problems I have identified relating to conservation, parking and the service road, stem from attempting to put too much on the site. While Project T3 contemplates built development, as the applicants point out [5.79], for the uses proposed for that project, it is the enabling development, which is not part of the project, which has become the principal component of the present scheme.
- 11.38 There would be many benefits in the various elements of the proposal, but I am satisfied that they are not, individually or collectively, of such a nature or on such a scale that they outweigh the objections I see to the development.
- 11.39 The site is wasted as it is, and I see no prospect of re-use of the Baths nor benefit in the retention of the building. However, it seems to me that to use it as now proposed, would be such a serious misuse of this important site that it is better to take a long-term view, making temporary steps for temporary uses which do not preclude a satisfactory use in a satisfactory form of development at some future time; Mr Jessel indeed suggested 100 year view, not one of five or ten years [9.6]. I shall, therefore recommend that planning permission be refused.
- 11.40 Much time was devoted to accounts of consultations, of public and committee meetings, exhibitions, newspaper reports and letters, voting, changes of opinion: it became clear that there was a fundamental division between the applicant: and the

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council on one side and the assembled and concerned societies and individuals on the other. Some of the circulated documents were said to be misleading [eg. 5.85, 9.2]. The inquiry has provided the appropriate forum for a full and well informed exploration of the issues, resulting in my conclusions and recommendation.

11.41 If it is decided nevertheless that planning permission should be given, it will be necessary to obtain the completed agreement (doc 40) between the parties before giving permission and to impose conditions. Those suggested by the applicants and the council (doc 41) appear to me to be generally appropriate, but will need more logical ordering, and conformity with the advice of Circular 1/85.

12 **RECOMMENDATION**

12.1 I recommend that planning permission be refused.

I have the honour to be,  
Sir,  
your obedient servant

Stephen Marks

1.13.10

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APPENDIX B1

13.61 The proposals for the Twickenham area are:

No.	SITE	PROPOSAL	JUSTIFICATION	IMPLEMENTATION
T1*	TWICKENHAM RIVERSIDE AND CAR PARK IN WATER LANE, 1-33 KING STREET	ENHANCEMENT OF RIVERSIDE AND SHOPPING AREA, LEISURE USES, HOUSING, LIMITED IMPROVEMENTS TO REAR SERVICING, CAR PARKING AND PUBLIC CONVENIENCES	<p>This site is of prime importance to the future of Twickenham: a longer term comprehensive planning brief will be drawn up as a framework for phased renewal and improvement of the area, as and when feasible, with the objective of achieving a high quality environment commensurate with its key position on the riverside and in the town centre. Development of the riverside site (expected in the Plan period) should be in harmony with the small scale and domestic aspects of the parts of the conservation area which give it its distinctive character so as to enhance the conservation area and area of special character and make significant contribution to achieving the Thames Landscape strategy. Its emphasis must be directed towards the river but should also provide the potential to link the town centre to the riverside both visually and in relation to activity. This link should be in the form of a pedestrian route from King Street, of sufficient width to create a visual link to the riverside and allow appropriate developments from it to encourage pedestrian movement and activity. A prime objective from the redevelopment of the riverside site should be to provide the community with leisure uses and increased opportunities to enjoy the riverside. Housing provision should include a substantial element of affordable housing and include a reasonable proportion of small units. Primary access to the site should continue to service shop premises in King Street. The opportunity should be taken to make limited improvements to servicing these premises and also improve the appearance of the rear of these properties. Important trees on the Embankment and along the service road must be retained, and opportunities taken to improve the environment of the key shopping frontage of King Street. The public conveniences should be replaced in the scheme and limited car parking only be provided. Proposal T14 for a landing stage should be considered as part of any scheme. (Policies REC 3, CET 2, RIV 1, RIV 3, RIV 4, HSG 6, HSG 11, TRN 16, HEP16, ENV 1, ENV 3, ENV 10)</p>	Private/Council

**13.61 The proposals for the Twickenham area are:**

Former swimming baths, car park, 15 King Street and Wharf Lane, the Embankment, Twickenham

Policy comments.

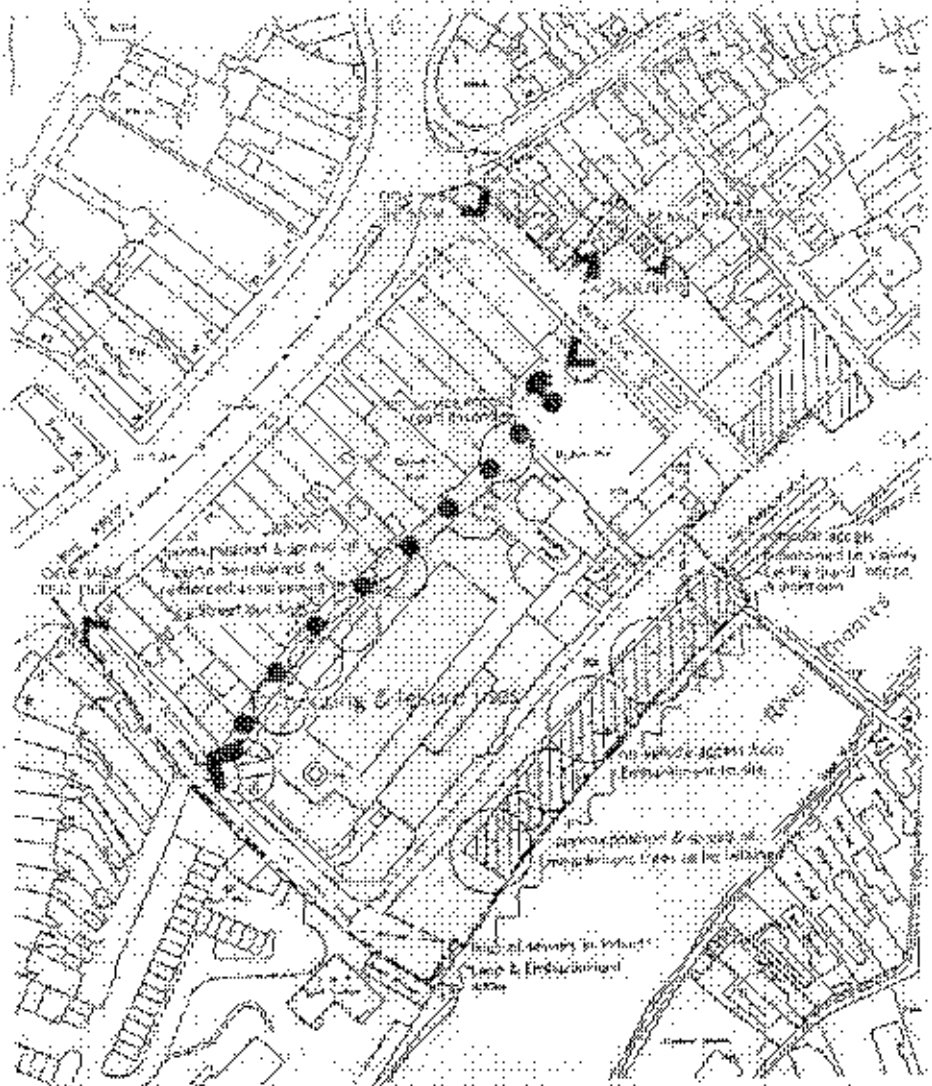
T1*	TWICKENHAM RIVERSIDE AND 1-33 KING STREET	ENHANCEMENT OF RIVERSIDE AND SHOPPING AREA, LEISURE USES, HOUSING, LIMITED IMPROVEMENTS TO REAR SERVICING, CAR-PARKING AND PUBLIC CONVENIENCES	<p>This site is of prime importance to the future of Twickenham. Development of the riverside site (expected in the Plan period) should be in harmony with the small scale and domestic aspects of the parts of the conservation area which give it its distinctive character so as to enhance the conservation area and Thames Policy Area and make significant contribution to achieving the Thames Landscape Strategy. Its emphasis must be directed towards the river but should also provide the potential to link the town centre to the riverside both visually and in relation to activity. This link should be in the form of a pedestrian route from King Street, of sufficient width to create a visual link to the riverside and allow appropriate developments from it to encourage pedestrian movement and activity. A prime objective from the redevelopment of the riverside site should be to provide a broad range of leisure activities for the community and increased opportunities to enjoy the riverside. Housing provision should include a substantial element of small units. Part of the original riverside site on Water Lane has been developed for housing by a Housing Association. Primary access to the site should continue to service premises in King Street. The opportunity should be taken to make limited improvements to servicing these premises and improve the appearance of the rear of these properties, and provide opportunities for small businesses. Important trees on the Embankment and along the service road must be retained, and opportunities taken to improve the environment of the key shopping frontage of King Street. The public conveniences should be replaced in the scheme and limited car parking only be provided. Proposal T14 for a landing stage should be considered as part of any scheme. (Policies REC 3, CET 2, RIV 1, RIV 3, RIV 4, HSG 6, HSG 11, TRN 16, HEP 16, ENV 1, ENV 3 ENV 10)</p>
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**SUPPLEMENTED**

# APPENDIX C

## SITE BRIEF FOR PROPOSAL T1

TRICKENHAM BATHS SITE, CAN PAIN IN WATER LANE, LTD TO KING STREET. Enhancement of existing and shopping area, developments for leisure uses, tourism, car parking and public conveniences on the baths site and housing on Water Lane.



	proposed boundary		metropolitan open land
	retained/development access		vehicular access
	lines of vehicle access		service area
	lines to be retained		potential loading stage

Location:	Twickenham town centre between Embankment and King Street.
Area:	Swimming baths and adjoining sites 0.59 ha; Water Lane car park site 0.167 ha; Total site area 0.757 ha (excluding King Street frontage).
Ownership:	London Borough of Richmond upon Thames and private.
Existing Uses:	Swimming bath site – baths (closed), public toilets, former caretaker's house and cafeteria housing temporary volunteer group uses, private service yard and car park
Major UDP Policies:	Area of special character (policies ENV 1, RIV1); Archaeological excavation (ENV 44 and 45); Conservation Area (ENV 9); recreation. Cultural and entertainment facilities (REC 3, RIV 4, CED 2); Public convenience (HEP 16); increased access to the river (RIV 3, RIV 7); Metropolitan Open land (ENV 3); Housing (HSG 5, HSG 6, HSG 11); Retail (SHP 6).
Planning Guidelines:	<p>Development of the baths and car park sites must be seen as part of the Thames landscape (see Thames Landscape strategy)) in this part of the Borough as well as making a significant contribution towards the consolidation and enhancement of the character of the Twickenham Riverside Conservation Area. It must be in harmony with the small scale and domestic aspects of the parts of the conservation area which give it its distinctive character and provide for the retention of all of Wharf Lane and water Lane. Its principal emphasis must be directed towards the river and should seek to enhance links between the town center and riverside both visually and in relation to activity, and result in increased opportunities for access to, and enjoyment of, the river. The Plan proposes the construction of a landing stage adjacent to this site. The opportunity should be taken to integrate this with the development.</p> <p>Proposed uses:</p> <ul style="list-style-type: none"> <li>- leisure activities, and community uses on the baths site should provide opportunities for a broad spectrum of the local community including the general public and people of different ages;</li> <li>- general policies of the Plan, particularly relating to key shopping frontages and retention of residential uses, will apply to the King Street frontage.</li> </ul>

- housing on Water Lane site and leisure and housing uses including those related to the river on the site of the baths. The amenities of nearby residents must be considered. Any housing provision should include a substantial element (25% minimum) of affordable housing and include a reasonable proportion of small units (bed-sit and one bed).

Design criteria - the Baths and Water Lane sites are riverside sites of exceptional importance and any scheme should exhibit a high quality of design, materials and finish. Variation to the existing building line on the swimming baths site can be accepted so long as the MOL is retained, and opportunities for improvement to the riverside should be undertaken. The constraints relating to the site should be noted. Development of the land on Water Lane will be expected to appear as an extension to the two storey pitched roof cottages of Church Street, and form a satisfactory conclusion to the pattern of the old village. Development of the baths site could in part continue this form of informal development extending, possibly to three storeys, or revert to a single building within grounds, echoing earlier land use patterns found repeatedly along the river.

Its emphasis must be directed towards the river, but should also provide the potential to link the town centre to the riverside. Progressive implementation may be possible and in particular should recognise long term potential arising when King Street properties are ultimately re-developed. The improvement of the pedestrian space along King Street as desirable and could be pursued with the Council in parallel with any scheme for the site. Development of the baths site should screen the rear of the commercial properties on King Street and their service yards and take any opportunities to improve the appearance of the rear of these properties. The flat roof form of the existing baths building should not be taken as a precedent in considering the design of any replacement building. Brick and tile are appropriate materials for extensions to the village. The baths site offers greater flexibility.

Trees - With the possible exception of four trees at the south-western end of the Embankment, existing trees to the service road and to the Embankment are to be retained and where appropriate reinforced with new planting. If the form of development of the baths site does not provide effective screening to the properties on King Street a landscaping scheme must be devised to achieve this aim.



	<p>Public open space - The existing riverside open space within the site should be considered in relation to this development and positive enhancement made both to this space and public access to it.</p> <p>Provision must be made for the Thames Path, a long distance route designated by the Countryside Commission, which runs along the Embankment and Wharf Lane.</p> <p>Metropolitan Open Land - The Metropolitan Open Land designation on the Embankment must be respected (ENV 3).</p> <p>Public conveniences - The existing public conveniences should be relocated and designed for people with disabilities. Siting should be to serve both King Street and the Embankment, preferably as close to Water Lane as possible.</p> <p>Flooding - The site is liable to flooding up to a level of 6.02m above Newlyn datum and account should be taken of this in design.</p>
<p>Access:</p>	<p>Rear access from Water Lane must be provided to the swimming baths site and the existing service road to the north of the site retained so as to serve the shops on the south side of King Street. Consideration must be given to enhancing pedestrian access between King Street and the riverside, if an additional access point is created it should be of sufficient width to create a visual link to the riverside and allow associated developments (eg small shops, cafes) to encourage pedestrian movement and activity and provide an attractive link to the riverside. Proposal T9 proposes a service road to the rear of Church Street and access to housing must be designed to form the first section. Individual accesses for the housing in Water Lane are not favoured. The design of any development must take account of the need to maintain access to Eel Pie Island footbridge and the slipway and to the proposed landing stage.</p>
<p>Parking:</p>	<p>The Embankment will be closed to through traffic and should no longer be considered available for use as a car park. The level of parking within the development will be the subject of discussion with the Local Planning Authority and will depend on the quality of the scheme. A provision of 31 spaces should be considered for replacement for existing residents' parking spaces.</p>

Implementation	<p>The Council will make the former pool site and the site on Water Lane available for joint development. Although the re-development of the King Street frontage is not envisaged at this stage, the properties are included in the site to ensure that a comprehensive approach is taken to the whole site: an approach which recognises the Council's commitment to investigating the potential to improve conditions for pedestrians in King Street, through pavement widening and initiatives. Facilities for archaeological excavation and recording must be granted in the process of development, in accordance with policies. Since the site is identified in an area of archaeological potential (Priority 1) the provision of ENV 44 and 45 will apply.</p>
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## APPENDIX D

12.55 The proposals for Twickenham are:

No.	SITE	PROPOSAL	JUSTIFICATION	IMPLEMENTATION
T1*	TWICKENHAM RIVERSIDE AND 1-33 KING STREET	ENHANCEMENT OF RIVERSIDE AND SHOPPING AREA, LEISURE USES, HOUSING, LIMITED IMPROVEMENTS TO REAR SERVICING, CAR-PARKING AND PUBLIC CONVENIENCES	<p>This site is of prime importance to the future of Twickenham. Development of the riverside site (expected in the Plan period) should be in harmony with the small scale and domestic aspects of the parts of the conservation area which give it its distinctive character so as to enhance the conservation area and Thames Policy Area and make significant contribution to achieving the Thames Landscape Strategy. Its emphasis must be directed towards the river but should also provide the potential to link the town centre to the riverside both visually and in relation to activity. This link should be in the form of a pedestrian route from King Street, of sufficient width to create a visual link to the riverside and allow appropriate developments from it to encourage pedestrian movement and activity. A prime objective from the redevelopment of the riverside site should be to provide a broad range of leisure activities for the community and increased opportunities to enjoy the riverside. Housing provision should include a substantial element of small units. Part of the original riverside site on Water Lane has been developed for housing by a Housing Association. Primary access to the site should continue to service premises in King Street. The opportunity should be taken to make limited improvements to servicing these premises and improve the appearance of the rear of these properties, and provide opportunities for small businesses. Important trees on the Embankment and along the service road must be retained, and opportunities taken to improve the environment of the key shopping frontage of King Street. The public conveniences should be replaced in the scheme and limited car parking only be provided. Proposal T14 for a landing stage should be considered as part of any scheme.</p>	Private / <del>Housing</del> Council

**ANNEX 2            by MacCormac Jamieson Prichard (MJP)**

**COMPLIANCE WITH THE BRIEF BASED ON PROPOSAL T1**

**1.0    *Introduction***

- 1.1    This section aims to relate the current proposals to the Brief T1 which forms part of the adopted UDP, to illustrate compliance with the primary aims and ambitions for the site.

**2.0    *Planning Guidelines***

- 2.1    “the Sites must be seen as part of the Thames Landscape (see Thames Landscape Strategy)”

- 2.1.1    Pol.7.1 ‘Conserve the intimate scale and working character of the Twickenham and Eel Pie Island Waterfront’.

- 2.1.2    The current proposals do not threaten the scale and working character of the existing Twickenham and Eel Pie Island Waterfront. The development offers new opportunities for the tourist related riverside industries.

- 2.1.3    Pol.7.6 ‘Conserve the tree framed setting of Twickenham Riverside’

The current proposals retain all the principal trees on the river frontage.

- 2.1.4    Pol. 7.8 ‘Secure possible connections between the centre of Twickenham and the swimming bath site.

The current proposals contain a new pedestrian link back to King’s Street.

- 2.1.5    Pol. 7.9 ‘Encourage provision of passenger loading facilities in front of Twickenham Baths site’.

A landing stage will complement the aspirations of the development and will be developed on the basis of a feasibility study being carried out, and financial viability being confirmed. This will form part of a separate application.

- 2.1.6    Pol. 7.8 ‘Set Car Parking back from the edge of Twickenham Embankment and improve the layout and seating of the public spaces.’

The ambition to pedestrianise or partially pedestrianise the Embankment is consistent with this policy. The final detail will be dependent on obtaining the necessary CPZ and road traffic orders.

- 2.1.7    Pol. LC1 ‘Conserving and enhancing the unique character of the Thames landscape as defined in the strategy.’

The photomontage massing studies demonstrate the limited impact of the development on the Twickenham stretch of the Thames Landscape.

- 2.1.8 Pol. LC5. 'Identify conserve and reveal the main Landmarks of the area; with particular concern for the frame and backdrop of the view. Where appropriate; new developments should contribute fresh Landmarks and foci to work with the existing urban pattern.'

The proposed development does not impact on any of the principal landmarks in the area namely the church tower or St James School. Thames Eyot is identified in the Conservation Area Proposals as being a building worthy of inclusion on the Schedule of Buildings of Townscape Merit. The new development does not challenge this role. The proposed development aims to be a landmark in terms of its role as a new focus for public engagement with the river.

- 2.1.9 LC.18 'Guide redevelopment of built recreation sites to complement the scale, character and urban structure of the surrounding waterfronts and make the most of the amenity, river related recreation and nature conservation potential. New visitors and access routes should be incorporated into redevelopment.'

The proposed development complements but does not mimic 'the scale and character and urban structure of the surrounding waterfronts'. It responds to the grain and structure of routes and intimate spaces that characterise Twickenham Village, whilst mediating between the scale of the village and that of the King Street and Thames Eyot flats that provide the most prominent backdrop for the site.

The development will bring visitors to the riverfront which, it is hoped, will support recreation on the Embankment in the form of markets or performance, whilst offering opportunities for further development such as the river pontoon and tourist related river traffic to the area.

The link from King Street provides a much needed new route and view to the river from Twickenham Town.

- 2.1.10 LC 20 'Conserve the unique river edge of continuous pedestrian public access; restricting vehicles and wherever possible remove car parking from the waterside. Consider the need of people with mobility difficulties and the provision of alternative parking where necessary.'

(see 2.1.5 above) The requirements of disabled visitors have been considered at all levels of the design, from parking provision, access to and from the development site, as well as access to all the proposed buildings.

- 2.1.11 Pol. RL1: 'Conserve and enhance the riverside spaces for people to sit watch, and sunbathe. Encourage riverside cafes, pubs and restaurants in the built waterfront'.

The current proposals comply with this policy offering opportunities for 'Cafes, Pubs and Restaurants' overlooking the river, with a variety of spaces for people to sit, watch be entertained or sunbathe by the river.

2.1.12 Pol. RL 18. Promote river tourist transport services etc.

The proposed development will raise the profile of Twickenham as a tourist destination and thus increase the feasibility and a boat service for Twickenham. (See 2.1.5 above).

2.2 Make a "significant contribution towards the consolidation and enhancement of the character of the Twickenham Riverside Conservation Area".

The proposed development will consolidate and enhance the character of the conservation area at a number of levels:

- It replaces a derelict site which currently blights the western stretch of the Embankment
- It provides improve linkage to King Street and the western end of Twickenham Town.
- It brings residences onto the site reinforcing the residential character of the area.
- It offers new leisure uses to the riverfront as well as new open space with views over the river.
- It offers a wide range of public new opportunities to enjoy the riverfront.

2.3 "It must be in harmony with the small scale domestic aspects of the parts of the conservation area which give it its distinctive character"

The proposed development aims to be in "harmony" with the "small scale domestic aspects" etc without attempting to mimic the scale or style of Twickenham Village.

The design responds to a number of features of the conservation area as noted in the Design Report.

The photomontage views demonstrate that, whilst larger than the pattern of development to the east, the development does not dominate its setting. It mediates between the scale of the village, with its broken down massing and informal series of spaces, and the scale of Thames Eyot, which dominates its western aspect.

The perceived height of the development is exaggerated by the raised ground floor level of the Upper Embankment. This relates to the existing ground level of the site – which probably dates back to its time as the Garden to Richmond House.

2.4 "Its principal emphasis must be directed towards the river and should seek to enhance links between town centre and the riverside".

This is clearly achieved in the current proposals, which place the main emphasis of the site onto the river frontage whilst providing the pedestrian link to the town centre.

- 2.5 “The plan proposes the construction of a landing stage adjacent to the site. The opportunity should be taken to integrate this with the development”.

(See 2.1.5 above).

### **3.0 Proposed Uses**

- 3.1 “Leisure activities and community uses on the baths site should provide opportunities for a broad spectrum of local community including the general public and people of different ages”.

The development includes:

- An arts cinema – which will have a range of programmes on offer including children’s programmes and OAP matinees.
- One of the auditorium will be given over to arts uses for 14 weeks a year providing local arts groups the opportunity to stage drama, music, poetry dance or other arts events.
- A health club containing a 25-meter swimming pool which will provide leisure opportunities for the entire community.
- Access to the pool for school parties, OAP’s, ladies only swimming, family swimming etc. at off peak hours ( 10-12 am and 2- 5pm weekdays and one afternoon at week ends) will offer greater opportunities for these key groups.
- Restaurants, café’s bars and specialist retail complement the max of leisure activities on offer. (see 2.1.11)
- The events supported by the public spaces both on the Upper Embankment and on the Lower Embankment (subject to satisfactory resolution of parking and access issues) such as French and Farmers markets of public performances, provide further opportunities for a wide cross section of the public to enjoy the riverside experience.

- 3.2 “Leisure and housing uses, including those related to the river on the site of the baths. Any housing should include a substantial element (25% minimum) of affordable housing and include a reasonable proportion of small units (bed-sit and one bed).”

The Water Lane site was developed as affordable housing. It was intended that this would satisfy the affordable housing requirements of the brief for the entire site. However, in order to comply with brief T1, and since the site was developed with 8 No. family houses rather than a greater number of smaller flat units, it has limited the total number of units permitted on the brief site to No.32. This would result in only 24No. the new units on the bath site.

This could be achieved through the development on the bath site of 8 No. small units, to satisfy the requirement for 25% smaller units, and 16 No. exclusive luxury maisonette apartments.

Such an approach was felt to be going against the spirit of the intentions of Brief T1, and the adopted solution is to provide a greater number of smaller units providing a better and less exclusive social mix to the area.

The total number of studios and one-bed apartments is 17 over 36% of the total.

#### **4.0 Design Criteria**

- 4.1 "Development the land on Water Lane will be expected to appear as an extension to two storey pitched roof cottages of Church Street and form a satisfactory conclusion to the pattern of the old village."

This has been completed successfully and to a high standard by others. It should be noted that there is recognition here, and in the following sentence, that there is an acceptance of a change in character across Water Lane.

- 4.2 "development of the baths site could in part continue this form of informal development extending possibly to three storey; or revert to a single building within grounds, echoing earlier land use patterns found repeatedly along the river".

There is a recognition here of the different historic land use patterns of the bath site compared with the Twickenham Village area. There is also a recognition that the size of the development could afford to be greater due to the different physical and historic context.

To this end, whilst the developments aims to continue the urban structure of Twickenham Village, the size of the development steps up from Water Lane to better address the 1930's developments of Thames Eyot and the King Street Shops which frame it on two sides.

The impact of this increase in size is mitigated by the massing which by running back from the river reduces the impact of the height.

Analytical sections demonstrate how the proposed scheme is lower and set back further over a majority of its length than the existing swimming pool building.

The taller three storey elements, whilst they are lower than the ridgeline of the King Street shops and the Thames Eyot flats, are seen as striking features on the new waterfront. They have precedents, in the four storey terrace houses that sit on the river edge on Riverside or in the scale of the larger residential developments on Cross Deep.



The development whilst seeking to minimise the impact of its mass on the site and surrounding area through breaking down massing into elements of a scale that are consistent with the domestic character of the area, and whilst employing a grid and pattern of fenestration that responds to the residential uses, is not pretending to be something that it is not.

It is a 21-st century mixed-use development with an emphasis on public engagement.

The site is being developed as one site, which is consistent with its historical unity

This finds expression in the common language of elements employed over the whole site

- 4.3 “Recognise the long term potential arising when King Street properties are ultimately re-developed”

Dawnay Day as owners of the King Street properties are aware of this potential and the possible development around the pedestrian link inherit to the design proposals.

- 4.4 “Development of the baths site should screen the rear of the commercial properties on King Street”.

The current proposals self evidently provide an effective screen.

- 4.5 “ The flat roof form of the existing baths building should not be taken as a precedent in considering the design of any replacement building”.

The design evokes riverside boathouses in its use of barrel vaulted roof profiles. Balconies on the river frontage are contained within the architectural form of the roof to avoid the association with flat roof.

- 4.6 “Brick and tile on appropriate materials for extensions to the village. The bath site offers greater flexibility”

Again the acceptance that the bath site has a different contextual fabric than the Water Lane Site.

The former has been developed using brick and tiles as advised.

The materials proposed for the bath site of white precast concrete to express the framing of the building and timber boarding infill panels evoke the more utilitarian aesthetic of boat sheds and the working river frontage.

- 4.7 “With the possible exception of four trees at the south western end of the embankment, existing trees to the service road and the Embankment are to be retained and where appropriate reinforced with new planting”.

- 4.8 "Public Open Space - The existing riverside open space within the site should be considered in relation to this development and positive enhancement made both to this space and the public access to it".

The proposals supplement and reinforce the existing open space with the upper embankment with its strong linear relationship to the lower embankment and river beyond. The stairs on Water Lane connect physically and visually to the green open space between Water lane and Bell Lane.

The anticipated environmental improvement of the embankment will reinforce the strategy adopted on the site.

- 4.9 "The existing public conveniences should be relocated and designed for people with disabilities. Sitting should be to serve both King Street and the embankment, preferably as close to Water Lane as possible".

The WC facilities have been split as envisaged above. The location on the embankment at the end of Water Lane is close to disabled parking spaces and avoids cluttering the busy area around the end of Water Lane and the Eel Pie Island Bridge.

## 5.0 Access

- 5.1 "Rear Access from Water Lane must be provided to the swimming baths. Site and the existing service road to the north of the site retained so as to serve the shops on the south of King Street".

This has been provided for as described.

- 5.1 "Consideration must be given to enhancing pedestrian access between King Street and the riverside, if an additional access point is created it should be of sufficient width to create a visual link to the riverside and allow associated developments to encourage pedestrian movement".

The pedestrian link has been provided. This provides the framework for the kind of future development at the rear of King Street envisaged above. This will be implemented as leases become available.

- 5.2 "The design of any development must take account of the need to maintain access to Eel Pie Island foot bridge and the slipway..."

The proposals can work with current traffic arrangement. **(See W S Atkins Report)**. Any changes will need to take due regard of the policy and will be subject of further consultation.

## **6.0 Parking**

- 6.1 "The Embankment will be closed to through traffic and should no longer be considered available for use as a car park".

"A provision of 31 spaces should be considered for replacement for existing residents parking spaces".

The proposals illustrate how the development could relate to a fully pedestrianised or partially pedestrianised embankment.

These proposals will be reviewed subject to further consultation and the compliance with the necessary changes to CPZ or Road Traffic Order.