



Figure 18: Proposed King Street Elevation Building A

- 4.16. The third element along Water Lane steps down from four storeys through to three storeys and features a linking section of simple design. This component needs to be designed as such as the proposal shifts to a more traditional vernacular at the fourth element which features hipped roofs and gables. Glazing dominates this element.
- 4.17. The design of the fourth element is reflected throughout the remaining facades of bottom half of Building A and the entirety of Building B. The two blocks are connected by two bridging links at first and second floor. As illustrated in Figure 19 there is symmetry between these two elements.



Figure 19: Proposed Water Lane Elevation - Building B

- 4.18. On the Embankment façade of Building B is an undercroft seating area as part of the A3 unit at ground floor with residential development at first and second floor featuring balconies overlooking the river. The roof is hipped with two gables replicating both the bottom end of the Water Lane elevations, the Diamond Jubilee Gardens elevations and the northern and southern facades of Building B and Building A respectively. Materials are brick with tile roof and metal railing for the balconies.

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- 4.19. At lower ground floor level, the proposal seeks to provide for six arched entrances to seasonal units and lower ground floor car park.



Figure 20: Embankment Elevation - Building B

- 4.20. At the Diamond Jubilee Gardens elevation, the proposal continues the feature gable elevations and hipped roof form with inset balconies featured in Building B and Juliette balconies on Building A. A chamfered edge to Building B has been included to provide a turning head for servicing, waste and delivery vehicles.



Figure 21: Diamond Jubilee Garden Elevation

- 4.21. The Planning Appraisal section of this Statement and the Design and Access Statement considers the design of this proposal in greater detail.

5. Policy Overview

5.1. Introduction

- 5.1.1. A key role of the planning system is to regulate the development and use of land in the public interest. At the heart of the planning framework are Statutory Development plans, which seek to guide the decision making process. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

5.2. National Planning Policy Framework (NPPF)

- 5.2.1. The NPPF was adopted in 2012, and at its heart is the presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

- 5.2.2. Paragraphs 6 and 7 promote the three dimensions of sustainable development (economic, social and environmental) which should not be undertaken in isolation, and are mutually dependent. The planning system must adhere to these roles through:

- Economic Role – contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth;
- Social Role – supporting strong, vibrant and healthy communities;
- Environmental Role – contributing to protecting and enhancing our natural, built and historic environment.

- 5.2.3. Paragraph 14 of the Framework is pertinent. It states:

At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For decision-taking this means:

- *approving development proposals that accord with the development plan without delay; and*
- *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole;*

- 5.2.4. The Core Planning Principles, as set out in paragraph 17 are also relevant. Of particular importance are the following (although not limited to):

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- *proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.*
- *always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
- *encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;*
- *conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;*

5.2.5. The promotion of sustainable transport performs ‘an important role to play in facilitating sustainable development’ (Paragraph 29, NPPF). It is therefore considered that the proposed redevelopment of the site is ‘located where the need to travel will be minimised and the use of sustainable transport modes can be maximised’ (Paragraph 34, NPPF).

5.2.1. In relation to design, paragraph 58 for the Framework states:

Planning policies and decisions should aim to ensure that developments:

- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- *optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
- *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
- *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
- *are visually attractive as a result of good architecture and appropriate landscaping.*

5.2.2. Paragraph 63 of the Framework reinforces this commitment to high quality design, stating; ‘in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area’.

5.2.3. Full consideration has been given to Section 10 of the National Planning Policy Framework that seeks to meet the challenge of climate change, flooding and coastal change. In this regard the application is accompanied by a Flood Risk Assessment and is considered acceptable in this respect.

5.2.4. Paragraph 131 of the Framework states that in determining planning applications local authorities should take account of:

- *The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*

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- *The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *The desirability of new development making a positive contribution to local character and distinctiveness.*

- 5.2.5. Paragraph 134 sets out the test for impact on heritage assets and acceptability of proposals, stating ‘*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use*’. Therefore, if it is perceived that assets are impacted then this would need to be weighed against the wider public benefits of the proposals.
- 5.2.6. Paragraph 137 sets out that local planning authorities should look for opportunities for new development within Conservation Areas and within the settings of heritage assets to enhance or better reveal their significance.
- 5.2.7. Paragraph 138 highlights that not all elements of a Conservation Area will necessarily contribute to its significance.
- 5.2.8. The Framework also confirms that legislation relating to the historic environment is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990. Of particular relevance are sections 16, 66 and 72, summarised as follows:

Concerning a listed building or its setting, the local planning authority or Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Concerning conservation areas, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

- 5.2.9. In this respect, it is our view that the proposal sustains and enhances the Conservation Area and the setting of nearby listed buildings.
- 5.2.10. Paragraph 173 of the Framework is of particular relevance in this instances, it states:

Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

5.3. National Planning Practice Guidance (NPPG)

- 5.3.1. The National Planning Practice Guidance (NPPG) supplements those overarching objectives of the National Planning Policy Framework. Those elements of the NPPG that are considered most pertinent in the determination of this planning application relate to the flood risk and coastal change, conserving and enhancing the historic environment, and the importance of good design.

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5.4. Spatial Development Strategy – The London Plan March 2016

- 5.4.1. 'The London Plan' is a strategic planning document for London and is the responsibility of the Mayor of London, 32 London boroughs and the Corporation of the City of London. The Localism Act of 2011 empowers communities to prepare neighbourhood plans for their area. In London, these plans are also required to be in general conformity with policies in the London Plan, making the London Plan a material consideration in the determination of planning applications.
- 5.4.2. The document is the overall strategic plan for London, setting out an integrated economic, environment, transport and social framework for the development of London over the next 20-25 years.
- 5.4.3. The London Plan identifies Richmond as being within the 'Inner London' zone. Paragraph 2.38 notes the extensive population growth which the Inner London zone has been subject to, and will be subject to. The paragraph notes how there is a predicted increase of 590,000 in its population, accounting for 31% of London's population growth to 2036. Paragraph 3.14 identifies how with a growing population delivering more homes for the people of London of 'high design quality' supported by the social infrastructure essential to a good quality of life will be a particular priority over the period covered by the Plan.
- 5.4.4. Policy 3.3 states:

Strategic

- B. Working with relevant partners, the Mayor will seek to ensure the housing need identified in paragraphs 3.16a and 3.16b is met particularly through provision consistent with at least an annual average of 42,000 net additional homes across London which will enhance the environment, improve housing choice and affordability and provide better quality accommodation for Londoners.*
- C. This target will be reviewed by 2019/20 and periodically thereafter and provide the basis for monitoring until then.*

LDF preparation

- D. Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1, if a target beyond 2025 is required, boroughs should roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target.*
- Da. Boroughs should draw on the housing benchmarks in table 3.1 [Lewisham has a ten year target (2015-2025) of 13,847 an annual target of 1,385 housing supply within this table] in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need (see Policy 3.8) and supply in line with the requirement of the NPPF.*
- E. Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets having regard to the other policies of this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including:*
- a. Intensification (see policies 2.13, 3.4)*
 - e. Sensitive renewal of existing residential area, especially in areas of good public transport accessibility (see policies 3.4, 3.5, 3.14)*

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5.4.5. Table 3.1 identifies 3,150 new dwellings over the ten-year period between 2015 – 2025 in the London Borough of Richmond upon Thames area.

5.4.6. Policy 3.4 refers to optimising the potential of housing, specifically looking at the relevant density of housing development. The policy states:

A. Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in table 3.2. Development proposals which compromise this policy should be resisted.

5.4.7. With relevance to Policy 3.4, table 3.2 is laid out as follows:

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150-200 hr/ha	150-250 hr/ha	200-350 hr/ha
3.8-4.6 hr/unit	35-55 u/ha	35-65 u/ha	45-90 u/ha
3.1-3.7 hr/unit	40-65 u/ha	40-80 u/ha	55-115 u/ha
2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha
Urban	150-250 hr/ha	200-450 hr/ha	200-700 hr/ha
3.8-4.6 hr/unit	35-65 u/ha	45-120 u/ha	45-185 u/ha
3.1-3.7 hr/unit	40-80 u/ha	55-145 u/ha	55-225 u/ha
2.7-3.0 hr/unit	50-95 u/ha	70-170 u/ha	70-260 u/ha
Central	150-300 hr/ha	300-650 hr/ha	650-1100 hr/ha
3.8-4.6 hr/unit	35-80 u/ha	65-170 u/ha	140-290 u/ha
3.1-3.7 hr/unit	40-100 u/ha	80-210 u/ha	175-355 u/ha
2.7-3.0 hr/unit	50-110 u/hr	100-240 u/ha	215-405 u/ha

Table 1 - Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectares), as of Table 3.2 of The London Plan, highlighted with relevance to the proposed development – highlighted sections are explained in the following paragraphs

5.4.8. As stated within the proposal section, the scheme will provide 39 no. dwelling units with a density of 227 habitable room per hectare or 88 units per hectare.

5.4.9. The Transport Assessment accompanying this application notes that the PTAL score lies somewhere between 5 and 6a and is subsequently very well connected. According to the table, Twickenham is considered to be a District Centre offering medium capacity for growth as set out within the London Plan (suggesting it is an 'Urban' setting) and as such the site would ordinarily require a high density of development (up to 260 u/ha or up to 700 hr/ha). However, paragraph 3.28 states:

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A rigorous appreciation of housing density is crucial to realising the optimum potential of sites, but it is only the start of planning housing development, not the end. It is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure (Policy 3.16), open space (Policy 7.17) and play (Policy 3.6).

- 5.4.10. In this instance, the proposal is located within a Conservation Area and provides for the wider aims of the Twickenham Area Action Plan including provision of open space (such as the public square) and public realm improvements, which take up a significant proportion of the available site area.
- 5.4.11. Paragraph 3.29 states that *‘while there is usually scope to provide a mix of dwelling types in different location, higher density provision for smaller households should be focused on area with good public transport accessibility (measured by Public Transport Accessibility Levels [PTALs])’*.
- 5.4.12. Paragraph 3.30 states that within the ranges identified within Table 1 of this statement, housing density should reflect the connectivity of the site: *‘where connectivity and capacity are limited, density should be at the lower end of the appropriate range’*. Whilst the connectivity is clearly good, capacity is constrained by policy, design, character and heritage constraints.
- 5.4.13. Policy 3.5, Quality and Design of Housing Developments, states that *‘Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment’*. The policy states: *‘New homes should have adequately sized rooms and convenient and efficient room layouts’*.
- 5.4.14. Policy 3.13, Affordable Housing Thresholds, states that *‘Boroughs should normally require affordable housing provision on a site which has capacity to provide 10 or more homes, applying the density guidance set out in Policy 3.4 of the Plan and Table 3.2.’*
- 5.4.15. With regard to sustainability Policy 5.3, Sustainable Design and Construction, states that *‘Development proposals should demonstrate that sustainable design standards are integral to the proposal’*.
- 5.4.16. Paragraph 5.25 notes that design features such as green roofs *‘can enhance biodiversity, absorb rainfall, improve the performance of the building, reduce the urban heat island effect and improve the appearance of a development’*.
- 5.4.17. Policy 5.10 - Urban Greening, states that proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening. Section C of the policy states that *‘Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping’*.
- 5.4.18. Within Policy 5.7, Renewable Energy, it is stated that the Mayor seeks to increase the proportion of energy generated from renewable sources. Following this policy paragraph 5.42 states that individual development proposals should also help to achieve these targets. It states how individual developments should apply the energy hierarchy outlined in Policy 5.2 of The London Plan – the hierarchy is as follows:

A. Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

- 1. Be lean: use less energy*

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2. *Be clean: supply energy efficiently*

3. *Be green: use renewable energy*

5.4.19. Policy 6.9, Cycling, Section B, prescribes that developments should ‘provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3 and the guidance set out in the London Cycle Design Standards’. Table 6.3 illustrates that for a C3 Use Class there is a requirement of two cycle spaces per dwelling.

5.4.20. Policy 6.13, Parking, refers to the required parking standards of developments. The policy refers to Table 6.2 (Figure 22, below) in allocating parking standards to new developments. The table illustrates that provision of up to 1 space per unit is acceptable on any site although the notes to the ‘All developments in area of good public transport accessibility in all parts of London should aim for significantly less than 1 space per unit’. The proposal is seeks to provide 21 residential spaces which equates to just over half a parking space per property.

	PTAL 0 to 1		PTAL 2 to 4		PTAL 5 to 6	
	150-200 hr/ha	Parking provision	150-250 hr/ha	Parking provision	200-350 hr/ha	Parking provision
Suburban						
3.8-4.6 hr/unit	35-55 u/ha	Up to 2 spaces per unit	35-65 u/ha	Up to 1.5 spaces per unit	45-90 u/ha	Up to one space per unit
3.1-3.7 hr/unit	40-65 u/ha		40-80 u/ha		55-115 u/ha	
2.7-3.0 hr/unit	50-75 u/ha		50-95 u/ha		70-130 u/ha	
Urban	150-250 hr/ha		200-450 hr/ha		200-700 hr/ha	
3.8-4.6 hr/unit	35-65 u/ha	Up to 1.5 spaces per unit	45-120 u/ha	Up to 1.5 spaces per unit	45-185 u/ha	Up to one space per unit
3.1-3.7 hr/unit	40-80 u/ha		55-145 u/ha		55-225 u/ha	
2.7-3.0 hr/unit	50-95 u/ha		70-170 u/ha		70-260 u/ha	
Central	150-300 hr/ha		300-650 hr/ha		650-1100 hr/ha	
3.8-4.6 hr/unit	35-80 u/ha	Up to 1.5 spaces per unit	65-170 u/ha	Up to one space per unit	140-290 u/ha	Up to one space per unit
3.1-3.7 hr/unit	40-100 u/ha		80-210 u/ha		175-355 u/ha	
2.7-3.0 hr/unit	50-110 u/hr		100-240 u/ha		215-405 u/ha	

Figure 22 - Parking provision limits

5.5. London Borough of Richmond upon Thames Core Strategy (2009)

5.5.1. The London Borough of Richmond upon Thames Core Strategy was adopted in 2009 and as such pre dates the publication of the Framework and the National Planning Practice Guidance. The Council is in the process of replacing this document with an emerging Local Plan. This plan is at an advanced stage of production having recently been subject to examination in public (September / October 2017) and as such carries weight. Until such a time that the Local Plan is adopted however, the Core Strategy remains the Development Plan (alongside the Twickenham Area Action Plan and Development Management Plan).

5.5.2. **CP1 Sustainable Development** seeks to locate development within town centres to reduce the need to travel by car and provide higher density development in such locations; consider the noise, air quality and contamination of proposed sites and seek an overall environmental gain in development.

5.5.3. **CP3 Climate Change – adapting to the effects** requires proposals to consider water conservation and drainage, summer cooling and flood risk in new proposals.

5.5.4. **CP4 Biodiversity** – the policy requires biodiversity to be safeguarded and enhanced in areas of new development and along wildlife corridors and green chains such as the River Thames and River Crane corridors.

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- 5.5.5. **CP5 Sustainable Travel** – seeks to give priority to pedestrians, including those with disabilities; provide and promote a well-designed bicycle and walking network; prioritise the needs of pedestrians and cyclists in the design of new developments; Limit any further expansion of parking in town and local centres; Require all major developments to submit a Transport Assessment (as submitted).
- 5.5.6. **CP7 Maintaining and Improving the Local Environment** – seeks to improve areas of poorer environmental quality and should recognise distinctive local character and contribute to creating places of a high architectural and urban design quality
- 5.5.7. **CP8 Town and Local Centres** - identifies Twickenham as a District Centre (shops and services primarily serving local catchments), encourages high density, car free residential development, to maintain and reinforce the centre's retail role; office development; provide a range of evening activity to promote a more diverse evening economy attractive to all age groups
- 5.5.8. **CP9 Twickenham Town Centre** – promotes high quality sustainable and accessible design through redevelopment and refurbishment of existing built environment and public space; encourage higher density residential development including affordable and small units and car free development, ensuring the protection of retail use in the key shopping frontages; promoting the centre as a visitor and tourist destination; place with a more diverse evening economy attractive to all age groups; Improving the environment particularly in the main shopping area and protecting and enhancing the historic environment and riverside;
- 5.5.9. **CP10 Open Land and Parks** – states that new provision of open space is encouraged within south Twickenham.
- 5.5.10. **CP14 Housing** – sets a housing target of 2,700 dwellings between 2007 and 2017 (270 dwellings per annum) and indicates that 700-1100 will be delivered in Twickenham. The private sector element of any development will include an appropriate number of small (1-bed) units, depending on location. This would be at least 25%, rising to the great majority (at least 75%) in more sustainable locations, such as town centres and other areas with high public transport accessibility and with good access to facilities.
- 5.5.11. **CP15 Affordable Housing** – seeks provision of 50% of all new units to be affordable housing, with a tenure mix of 40% housing for social rent and 10% intermediate housing and that the affordable housing mix should reflect the need for larger social rented family units.
- 5.5.12. **CP17 Health and well being** - new development should encourage and promote healthier communities and places; A pattern of land use and facilities will be promoted to encourage walking, cycling, and leisure and recreation and play facilities to provide for a healthy lifestyle for all, including provisions for open and play space within new development as appropriate.
- 5.5.13. **CP19 Local business** – seeks to retain land in employment uses for business, industrial or storage; requiring mixed use schemes to retain the level of existing employment floorspace.
- 5.5.14. **CP20 Visitors and Tourism** - encourages tourist attractions (such as the River) and seeks to enhance the environment in areas leading to and around such destinations.
- 5.5.15. The Planning Appraisal section of this report considers the proposal against relevant policies.

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5.6. Richmond upon Thames Development Management Plan (2011)

- 5.6.1. The London Borough of Richmond upon Thames Development Management Plan (2011) sets out more detailed policies for consideration alongside the Core Strategy 2009. The emerging Local Plan will replace all policies within this document. Until such a time that the new Local Plan is adopted, the Development Management Plan remains as part of the adopted Development Plan against which development proposals are assessed.
- 5.6.2. **Policy DM SD 1 Sustainable Construction** - New non-residential buildings over 100sqm will be required to meet the relevant BREEAM 'excellent' standards. All development in terms of materials, design, landscaping, standard of construction and operation should include measures capable of mitigating and adapting to climate change to meet future needs.
- 5.6.3. **Policy DM SD 2 Renewable Energy and Decentralised Energy Networks** - New development will be required to conform with the Sustainable Construction Checklist and should follow the energy hierarchy.
- 5.6.4. **Policy DM SD 5 Living Roofs** - The aim should be to use at least 70% of any potential roof plate area as a living roof.
- 5.6.5. **Policy DM SD 6 Flood Risk**
- 5.6.6. **Policy DM SD 7 Sustainable Drainage** to follow the drainage hierarchy (see below) when disposing of surface water and must utilise Sustainable Drainage Systems (SuDS) wherever practical. Any discharge should be reduced to greenfield run-off rates wherever feasible.
- 5.6.7. **Policy DM SD 8 Flood Defences** - The effectiveness, stability and integrity of the flood defences, river banks and other formal and informal flood defence infrastructure within the borough will be retained and provision for maintenance and upgrading will be ensured. Setting back developments from river banks and existing flood defence infrastructure, where there are opportunities, will be encouraged. The removal of formal or informal flood defences is only acceptable if this is part of an agreed flood risk management strategy by the Environment Agency. The Environment Agency must be consulted for any development that could affect a flood defence infrastructure.
- 5.6.8. **Policy DM SD 10 Water and Sewerage Provision** New development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development.
- 5.6.9. **Policy DM OS 5 Biodiversity and new development** All new development will be expected to preserve and where possible enhance existing habitats including river corridors and biodiversity features, including trees.
- 5.6.10. **Policy DM OS 6 Public Open Space** New Public Open Space with convenient access for all will be provided where possible, or existing areas made more accessible, particularly in areas poorly provided with public open space. These will be linked to the wider network of open spaces
- 5.6.11. **Policy DM OS 7 Children's and Young People's Play Facilities** New developments must assess the needs arising from the new development by following the benchmark standards outlined in the Mayor's Supplementary Planning Guidance on Providing for Children and Young People's Play and Informal Recreation (see para 4.1.27).

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- 5.6.12. **Policy DM OS 9 Floodlighting** Floodlighting of sports pitches, courts and historic and other architectural features will be permitted unless there is demonstrable harm to character, biodiversity or residential amenity.
- 5.6.13. **Policy DM TC 1 Larger Town Centres** Proposals that contribute towards a suitable mix of uses will be approved, provided that they are appropriate to the function, character and scale of the centre. Acceptable town centre uses could include retail (if within or well related to designated frontages), business, leisure, tourism, community uses, health and residential development compatible with other development in the town centre.
- 5.6.14. **Policy DM TC 3 Retail Frontages** The Council will protect the existing retail areas of the town centres by controlling changes of use from retail. The Council has designated parts of centres as Key Shopping Frontage or Secondary Shopping Frontage. Proposals that result in a loss of retail space in key shopping frontages will be generally resisted. The Council will support other uses converting to retail, subject to there being no adverse impact on the centre, and seek to retain key facilities, including Post Offices.
- 5.6.15. **Policy DM TC 5 The Evening Economy** Uses that support the evening economy such as cinemas, leisure, restaurants, bars, pubs or other similar uses will be supported if they are compatible with other policies within the plan and add diversity to places such as Twickenham and there is no adverse impact to amenity.
- 5.6.16. **Policy DM HD 1 Conservation Areas - designation, protection and enhancement** Buildings or parts of buildings, street furniture, trees and other features which make a positive contribution to the character, appearance or significance of the area should be retained. New development (or redevelopment) or other proposals should conserve and enhance the character and appearance of the area
- 5.6.17. **Policy DM HD 3 Buildings of Townscape Merit** The Council will seek to ensure and encourage the preservation and enhancement of Buildings of Townscape Merit.
- 5.6.18. **Policy DM HD 4 Archaeological Sites** It will take the necessary measures required to safeguard the archaeological remains found, and refuse planning permission where proposals would adversely affect archaeological remains or their setting.
- 5.6.19. **Policy DM HO 2 Infill Development** - All infill development must reflect the character of the surrounding area and protect the amenity of neighbours and should take account of:
1. Plot width - plots must be sufficient width to allow a dwelling(s) to be sited with adequate separation between dwellings;
 2. Spacing between dwelling - new dwellings must have similar spacing between buildings to any established spacing in the street;
 3. Height - dwelling height should reflect the height of existing buildings;
 4. Materials - where materials on existing dwellings are similar, new dwellings should reflect those materials;
 5. Architectural details - new dwellings should incorporate or reflect traditional architectural features;
 6. Trees, shrubs and wildlife habitats - features important to character, appearance or wildlife must be retained or re-provided;
 7. Impact on neighbours - including loss of privacy to homes or gardens.

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5.6.20. **Policy DM HO 4 Housing Mix and Standards** Development should generally provide family sized accommodation, except within town centres where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the location. Amenity space for all new dwellings should be:

- private, usable, functional and safe;
- easily accessible from living areas;
- orientated to take account of need for sunlight and shading;
- of a sufficient size to meet the needs of the likely number of occupiers;
- accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space.

5.6.21. The Planning Appraisal section of this report considers the proposal against relevant policies.

5.7. Twickenham Area Action Plan (2013)

5.7.1. The proposed development site comprises one section of the Twickenham Riverside and Approaches (TW7) allocation within the adopted Twickenham Area Action Plan (TAAP, 2013). The TAAP sets out more detailed policies for specific site allocations within Twickenham. The TAAP is clear that the future use and appearance of the site is considered critical to the success more generally of Twickenham as a destination.

5.7.2. Subsequently, a comprehensive approach to the site is set out within the TAAP under TW7. The application site is one part of the allocation (refer to Figure 23 below), any proposal must be mindful of the wider aspirations of the allocation so as not to prejudice successful future implementation.

5.7.3. The TAAP as adopted sets out a number of overlapping / repeated aims, objectives and key principles. The summarised bullet points below include the main relevant aims of the TAAP to the development site:

- To improve the pedestrian environment and reduce dominance of parked and moving traffic;
- To strengthen the retail offer on King Street and in Water Lane to provide for pedestrian priority with extension of existing service road across the car park to Water Lane, and redevelopment of the car park to provide for residential and/or town centre uses;
- To open up and redevelop/refurbish the remaining area of the former pool site, which adjoins the recently refurbished Diamond Jubilee Gardens;
- To upgrade the Embankment south of the Diamond Jubilee Gardens to provide a pedestrian priority/shared surface with new landing facilities;
- The visual amenity and significance of Eel Pie Island, its historical working waterfront, leisure clubs, businesses, moorings and eclectic mix of chalets are part of the character and function of this part of Twickenham, and the impact of the proposals in the Twickenham Area Action Plan must be given due consideration;
- The whole area will have improved links to the retail core, the Thames Path and open spaces up- and downstream and will become an attraction in its own right.

5.7.4. In addition to the main aims the TAAP identifies the following key objectives:

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- maintain the existing ground floor retail frontages and residential uses above on King Street and provide new specialist retail, leisure and community uses;
- to link the existing service road to Water Lane;
- create new open space to provide for a wide range of open uses, including on the former pool site and in the form of civic space beside Water Lane;
- to improve the environment of the Embankment including reduction in car parking;
- to improve the Water Lane and Wharf Lane links from the town centre to the Embankment as shared use spaces; to provide a link between the service road and Water Lane; and to secure the redevelopment of the car park in Water Lane with residential and/or town centre uses;
- to achieve high quality traditional design and/or reuse of buildings;
- to conserve and enhance the Twickenham Riverside Conservation Area and its setting and the setting of the Queens Road Conservation Area;
- all new uses to take account of the unique riverside setting.

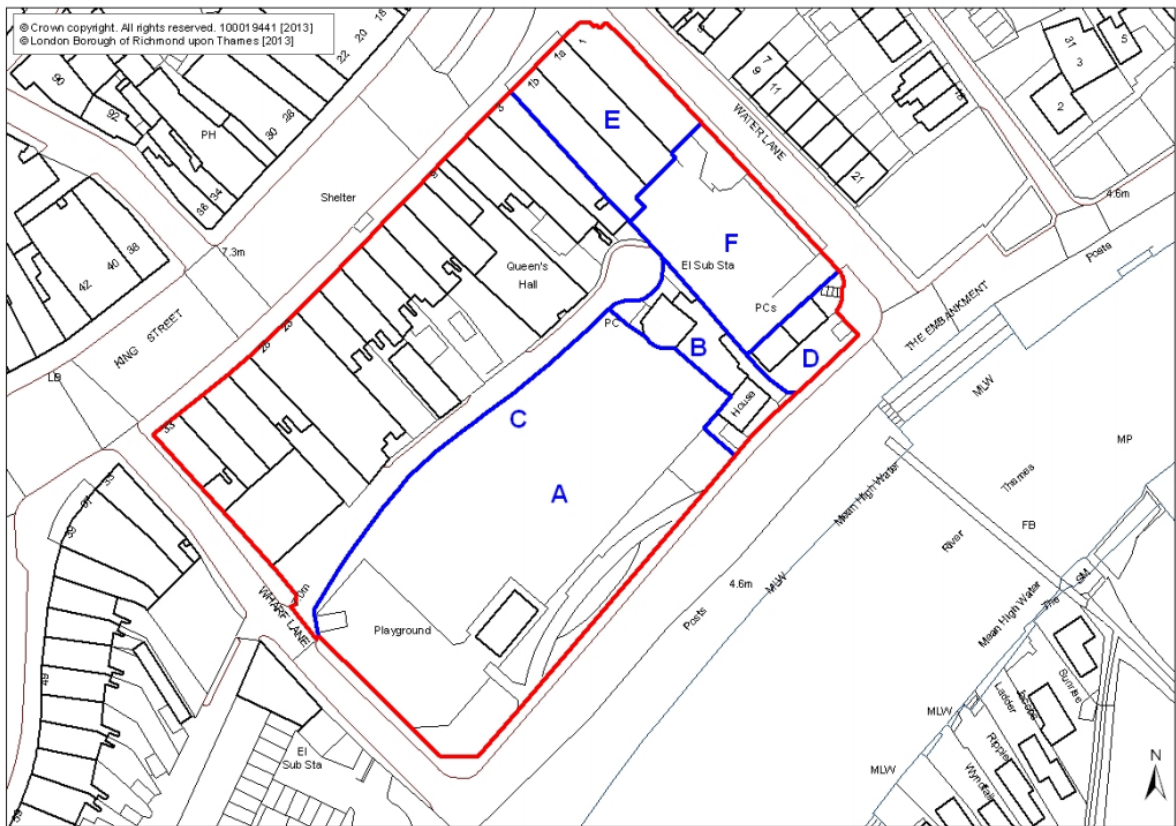


Figure 23: TAAP: Twickenham Riverside Site

5.7.5. These objectives in turn are reflected within the proposed uses on site as follows:

- (A) Open space (excluding the area where there are currently buildings), a mixture of hard and soft landscaping to allow a variety of leisure activities, playground and café;
- (B) Reuse or replacement of existing buildings to provide mixed uses with active frontages at ground floor level;

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- (C) In long-term, subject to agreement of the community, potential low rise leisure and community pavilions closer to the service road area, to enliven the area and allow public enjoyment of the riverside open space;
- (D) Redevelopment or reuse of former public toilets fronting Water Lane for residential, leisure or café use;
- (E) Redevelopment or partial redevelopment of 1, 1a and 1b King Street with setback or inset to create a public square or other civic space with active frontage at ground floor level and residential development above of a height and design appropriate to the location of the site;
- (F) Redevelopment of the car park in Water Lane with residential and/or town centre uses together with the continuation of the service road between Water Lane and Wharf Lane.

5.7.6. In addition to the aims, objectives and key uses the TAAP provides specific design guidelines. These are set out as below:

- Create a destination on the riverside with high quality facilities/events;
- Enhance and extend Diamond Jubilee Gardens with high quality landscaping, children's play space and performance/events space, on site of former swimming pool;
- Along the Embankment to upgrade the areas of open space, create a pedestrian priority area and review the car parking provision;
- Retention of significant trees;
- Creation of pedestrian priority area on Water Lane and Wharf Lane to extend the ambience of Church Street to riverside;
- Development on Water Lane frontage to complement existing residential development and to include town centre uses where feasible.
- Future redevelopment of 1, 1a and 1b King Street to include set back of building at junction with Water Lane to create enhanced public space with views towards the river where possible.
- Design of new development to respect character of Conservation Area and to minimise impact on residential amenity;
- Promote improvements to rear courtyards of properties in King Street;
- Encourage reuse or redevelopment of buildings to rear of King Street to create active frontage onto improved service yard.

5.7.7. Policy TWP1 of the TAAP seeks to enhance the retailing in the town centre which either enhance the specialist role of Twickenham by providing a limited number of small retail units *or upgrading of existing units to meet modern needs.*

5.7.8. There are clearly significant aspirations for the site as set out within the TAAP. The proposals have taken into consideration these ambitions and has sought to deliver the key aspects set out above where possible. It must be reiterated the application site is only one part of the wider TAAP allocation and as such, some of the aspirations referred to cannot be delivered by this development alone. However, the proposal has sought to ensure that it does not prejudice the potential for the wider aspirations for the site to come forward at a later date.

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5.8. Emerging Local Plan 2017

- 5.8.1. The Council is in the process of replacing this document with an emerging Local Plan. This plan is at an advanced stage of production having recently been subject to examination in public (September / October 2017) and as such carries weight.
- 5.8.2. According to the Richmond upon Thames website the Local Plan is anticipated to be adopted in spring 2018. A list of relevant policies considered through the design of the proposal are provided below. Where relevant these have been discussed within the Planning Appraisal section of this Statement.

Policy LP 1 Local Character and Design Quality
Policy LP 2 Building Heights
Policy LP 3 Designated Heritage Assets
Policy LP 4 Non-Designated Heritage Assets
Policy LP 5 Views and Vistas
Policy LP 7 Archaeology
Policy LP 8 Amenity and Living Conditions
Policy LP 9 Floodlighting
Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination
Policy LP 11 Subterranean developments and basements
Policy LP 12 Green Infrastructure
Policy LP 15 Biodiversity
Policy LP 16 Trees, Woodlands and Landscape
Policy LP 17 Green Roofs and Walls
Policy LP 18 River corridors
Policy LP 20 Climate Change Adaptation
Policy LP 21 Flood Risk and Sustainable Drainage
Policy LP 22 Sustainable Design and Construction
Policy LP 24 Waste Management
Policy LP 25 Development in centres
Policy LP 26 Retail Frontages
Policy LP 28 Social and Community Infrastructure
Policy LP 29 Education and Training
Policy LP 30 Health and Wellbeing
Policy LP 31 Public Open Space, Play Space, Sport and Recreation
Policy LP 34 New Housing
Policy LP 35 Housing Mix and Standards
Policy LP 36 Affordable Housing
Policy LP 37 Housing Needs of Different Groups
Policy LP 39 Infill, Backland and Backgarden Development
Policy LP 40 Employment and local economy
Policy LP 41 Offices
Policy LP 43 Visitor Economy
Policy LP 44 Sustainable Travel Choices
Policy LP 45 Parking standards and servicing

5.9. Supplementary Planning Documents and Guidance

- 5.9.1. In addition to the Development Plan policies, the Council has adopted numerous Supplementary Planning Guidance and Documents. The guidance within the following documents carry varying weight as Material Planning Considerations and have been reviewed as part of this planning application.

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Affordable Housing
Buildings of Townscape Merit
Car Club Strategy
Design Quality
Front Garden and other Off-Street Parking Standards
House Extensions and External Alterations
Planning Obligations
Refuse and Recycling Storage Requirements
Residential Development Standards
Shopfronts
Small and Medium Housing Sites
Sustainable Construction Checklist
Conservation Areas
Contaminated Land
Design for maximum access
Historic Buildings - Maintenance and Repair
Nature Conservation and Development
Planning guidance for food and drink establishments
Security by Design
Shopfront Security
Trees: Landscape Design, Planting & Care
Trees: Legislation and Procedure
Wildlife in Gardens

6. Planning Appraisal

6.1. Introduction

6.1.1. The main issues in relation to this proposal are as follows, but not limited to:

Principle of Development

Design, Form and Appearance

Landscape and Open Space

Residential Amenity

Affordable Housing Provision

Viability and Community Infrastructure Levy

Flood Risk

Heritage

Daylight Assessment

Ecology

Arboriculture

Transport, Highways and Accessibility

Delivery and Services

Noise Assessment

Air Quality and Odour Assessment

Contaminated Land

Energy and Sustainability

6.2. Principle of Development

6.2.1. The Twickenham Area Action Plan (TAAP) provides the detailed *site specific* land use policy. Since the site is one part of allocation TW 7 within this document (and which forms part of the Development Plan), the proposal has sought to address the relevant requirements and objectives of the TAAP as a priority.

6.2.2. Further location specific policies are held within the Core Strategy whilst more generic policies are held within the Development Management Local Plan. The weight applied to each must therefore follow on the basis of site specific requirements and as such the aspirations of the TAAP would carry more weight (also being the most recently adopted Development Plan Document). Furthermore, the TAAP will remain as part of the Development Plan if and when the emerging Local Plan is adopted.

6.2.3. On this basis, the aim of the TAAP for Site TW 7 (within which the application site falls) is to *bring this derelict site back into active use, taking advantage of its riverside location and improving links between this area and the town*. The allocation also notes that a *substantial area of open space is to be retained*.

6.2.4. The TAAP has a significant number of aspirations that apply to the application site (and indeed a number of aspirations which do not relate to the application site). Relevant aspirations include the provision of the following uses: open space; mixed uses with active frontages on the riverside; provision of café / leisure uses; the redevelopment of 1, 1a and 1b King Street with active frontages at ground floor and residential uses above and the retention of retail frontages. No specific floor space figures or housing numbers are referred to within this document.

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- 6.2.5. A specific requirement of the TAAP is the provision of a public square and to create a 'destination' on the riverside and policies CP9 and CP20 of the Core Strategy seek to enhance the environment in areas leading to and around tourist destinations – the River is identified as such a destination. The TAAP seeks to increase views towards the river where possible and to create enhanced public space along Water Lane.
- 6.2.6. The proposal seeks the redevelopment of a brownfield site in a highly sustainable location within the built up area of Twickenham for a mix of residential, retail, commercial and open space uses (including significant public realm improvements such as a new public square and the widening of Water Lane making for a much improved pedestrian environment and increasing glimpses of the river).
- 6.2.7. The proposal is thus considered to accord with the main aims of the TAAP to regenerate the site bringing it back into active use taking advantage of the riverside location and improving links with the town. The proposed uses within a town centre location are considered appropriate in principle and accord not only with the aims of the TAAP but indeed with the Spatial Strategy and Policy 1.B of the Core Strategy and the Local Plan Strategic Vision of the emerging Local Plan.
- 6.2.8. The effective use of brownfield land is encouraged within the Framework at paragraph 17, the London Plan at Policy 3.3 and *maximising* such sites is referred to within both the Core Strategy and emerging Local Plan Spatial Strategy. In this regard the proposal seeks to make most efficient and effective use of land whilst recognising the aspirations of the TAAP and character being located within a Conservation Area.

Ground Floor Uses

- 6.2.9. A mix of A1 and A2 uses prevail on the existing King Street frontage at ground floor level. A B1 office space is located at first floor level on this frontage.
- 6.2.10. In terms of ground floor land uses, the proposal would provide A1, A3, B1 and 'other' (flexible – commercial) provision. The table below (Figure 24) illustrates the existing and proposed ground floor uses as well as an assessment of existing and proposed employment levels.
- 6.2.11. The proposal will therefore lead to a complete loss of A2 use as well as a reduction in retail sales floor space. There are no specific policies within the Development Plan which require the retention of A2 use and such loss is therefore considered acceptable.
- 6.2.12. Whilst the proposal will lead to a loss in A1 floor space, the retail frontage will be increased by virtue of Unit 1 wrapping around both King Street and Water Lane frontages whereas the existing Santander building predominantly fronts onto King Street. In this respect, the proposal will increase the active retail frontage from the existing circa 24m of frontage to circa 35m of frontage (or a circa 45% increase in retail frontage).
- 6.2.13. The proposal is therefore considered compliant with policy CP9 of the Core Strategy which seeks to protect retail *uses* within key shopping frontages and with the general design aspirations of the TAAP since it protects and retains the retail use as well as extending the retail frontage, promoting a more vibrant retail environment.
- 6.2.14. In replacing what is a tired and unattractive set of retail units with a retail offer that truly addresses the corner of King Street and Water Lane, the proposal seeks to positively address the first two parts of Policy CP9 which seek to revitalise the town centre of Twickenham through high quality design and refurbishing the existing built environment.

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Use Class	Floor area required per Full Time Equivalent Employee	Existing Active Floorspace (sqm)	Approximate job total (Existing floorspace divided by density)	Proposed Floorspace (sqm)	Approximate job total (Proposed floorspace divided by average lower density)
A1 (Retail Sales Floorspace)	15-20 (average = 17.5)	494	28	244	14
A2	16	219	14	0	0
A3	15-20 (average = 17.5)	0	0	505	30
B1	13 (highest density)	255	20	250	20
Flexi (A1, A3 and D1)	15-20 (assumed A1/A3 use) (average = 17.5)	0	0	62	4
Total		968	62	1085	68

Figure 24: Existing Floorspace Vs Proposed Floorspace (employment densities follow the Employment Density Guide 3rd edition, 2015, HCA).

- 6.2.15. It should be noted that Policy CP9 is a site specific policy relevant to Twickenham Town Centre only. The loss of A1 *floor space* is resisted in the more generic Policy DMTC 3 of the Development Management Plan which states that *proposals that result in a loss of retail space in key shopping frontages will be generally resisted* and similar wording has been carried over to the emerging Local Plan.
- 6.2.16. Policy TWP 1 of the TAAP conversely notes that proposals to upgrade existing units to meet modern needs will be supported and whilst the proposal would result in a loss of retail floor space, it is clear that it will also result in a significant improvement to the retail offer of the town in providing for retail units which meets modern standards. The background text to this policy is clear that the aim is to create suitably sized units for modern needs and to *enhance or improve the outward appearance...*
- 6.2.17. In turning down Water Lane, a B1 (250 sqm) use is proposed to ensure that the scheme will cause no loss of employment floor space in line with adopted policy (TWP 2, DM EM1 and emerging policy LP41).
- 6.2.18. This new unit will replace the existing dated offer which is poorly located at first floor level. It will provide for a high quality new office space for future occupiers, an approach which is specifically encouraged by TAAP policy TWP 2 which seeks to *consider proposals to bring unsuitable office space above shops into residential use* and to *upgrade the external appearance and internally to meet modern day requirements*. Furthermore, policy CP9 of the Core Strategy seeks to promote the town centre as an *employment location particularly for new or refurbished high quality offices*.

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- 6.2.19. Policy TWP 1 of the TAAP notes that retailing proposals outside of the designated frontages will not normally be acceptable. Subsequently, the larger retailing element has been located on King Street with the potential for smaller retailing offer within a flexible unit located within Unit 4.
- 6.2.20. From a commercial point of view, the provision of a new retail use addressing the corner of Water Lane and King Street is considered to be a significant improvement on the existing offer providing greater street frontage and presence on what is a critical corner within Twickenham.
- 6.2.21. The proposed unit is of sufficient width replacing the poorly configured deeper units that currently occupy the site. There is clear demand for well-proportioned retail units fronting King Street that can service the needs of high street retailers. The *only* location that high street brands will consider in Twickenham would be those units fronting King Street hence the design for one unit covering the entirety of this frontage, encouraging further footfall towards the river.
- 6.2.22. A loss of retail floor space has been incurred as a result of the proposal seeking to meet the aims of adopted policy. The significant public realm improvements proposed along Water Lane (as identified within the TAAP and discussed below) has directly resulted in the loss of floor space for retail use. In this regard, the proposal increases the total amount of pedestrian realm on Water Lane from the existing width of circa 1.8m – 1.9m to a proposed width of circa 6.5m to 7.5m. This has a direct impact on the King Street frontage where retail uses are best placed for commercial reasons (considered further below).
- 6.2.23. Plant, bin stores and the core for the residential uses are required at the northern end of the development and therefore limit the amount of space for retail use. The cores have been carefully positioned to ensure the proposal is efficient and meets fire safety distances for the residential uses above.
- 6.2.24. Retail floor space has also been reduced to ensure that B1 use is replaced and to ensure that the uses proposed elsewhere in the scheme (i.e. the A3 uses) create the necessary activity and vitality to act as a draw to the Riverside. From a layout point of view, these A3 uses have been carefully placed to address the areas of open space within and surrounding the site and in order to create activity and interest. In relation to this last point, the corner of Unit 3 is particularly important being visible from King Street.
- 6.2.25. The proposed B1 use has been positioned to the south of the A1 unit as a logical location for such a use. It would not be appropriate to locate B1 to those units with views of the river and fronting onto the proposed open space (ie Units 3 and 5) since B1 would not create the desired activity, interest and place making 'destination' requirements stipulated within the TAAP.
- 6.2.26. During the design of the proposal the B1 unit had been considered for an A1 use but this would result in the total loss of B1 which would be contrary to adopted policy. Furthermore, providing retail uses southwards on Water Lane or indeed elsewhere within the scheme is considered less commercially supportable since there is no obvious existing retail loop attracting shoppers away from King Street.
- 6.2.27. The B1 unit to the rear of Unit 1 is less commercially attractive for retail since it has no frontage on to King Street. Amalgamating these two units would be a possibility but commercial marketability of one single space of this size would be extremely challenging. Subsequently, the decision to retain a B1 use in line with policy was considered entirely appropriate.
- 6.2.28. In order to attract people to Water Lane the proposal needs to create a destination and provide people with a reason to head off King Street. The only way to do this is by creating a destination due to the lack of passing trade/footfall on King Street.

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- 6.2.29. The proposed A3 units (Units 3 and 5) are of a sufficient size to ensure commercial uptake by a future occupier and furthermore meet the modern requirements expected of such uses. Such town centre uses are further considered entirely appropriate in this location but more importantly are considered to exploit the unique riverside location referred to within the TAAP. The proposal seeks to provide Unit 4 as a flexible use including potential A1, A3, and D1 uses and as such there may be some uptake of retail use in this unit.
- 6.2.30. Subsequently, in meeting the requirements of the TAAP and adopted policy specifically by widening and substantially improving the Water Lane environment, providing for significant new areas of open space, re-providing employment floor space and encouraging uses that will draw visitors from the town towards the riverside, there has been a loss in A1 floor space. Whilst this is contrary to one part of Policy DMTC 3 of the Development Management Plan, the overall approach to ground floor retail and commercial uses is considered in all other respects to be policy compliant providing for a regeneration scheme which is greater than the sum of its individual parts.

First, Second and Third Floors

- 6.2.31. Residential uses are proposed on the first, second and third floors. Such uses are considered appropriate in principle being supported within the TAAP, Core Strategy and emerging Local Plan.
- 6.2.32. Policy CP8 of the Core Strategy encourages higher density development, including the provision of smaller units within Twickenham Town Centre.
- 6.2.33. Policy CP14 part (e) states that the private sector element of any development should include an appropriate number of small (1bed) units, depending on location. This would be at least 25%, rising to a great majority (at least 75%) in more sustainable locations, such as town centres and other areas with high public transport accessibility and with good access to facilities
- 6.2.34. Development Management Plan (2011) Policy DM HO4 states:
- Development should generally provide family sized accommodation, except within town centres where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the location.*
- 6.2.35. This policy is less prescriptive than the Core Strategy policy and has been repeated, virtually verbatim, within the emerging Local Plan Policy LP35 which clearly illustrates the direction of travel with regards to housing mix. The policy is provided as follows:
- Development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the location.*
- 6.2.36. The Twickenham Area Action Plan is not prescriptive on residential provision for the site although the document does refer to the Core Strategy and Development Management Plan Housing policies.
- 6.2.37. The Development Management Plan and the emerging Local Plan define small units as 1 bedroom units or studio flats. Family sized accommodation has been defined as 2 bedroom, 4 person and above sized units as set out within the Council's pre application meeting response (dated 29.08.17).

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6.2.38. The proposal includes 39 new apartments as follows:

18	x	1 bedroom (2 person) (46%)
5	x	2 bedroom (3 person) (13%)
14	x	2 bedroom (4 person) (36%)
2	x	3 bedroom (5 person) (5%)

6.2.39. The proportion of 'non-family sized' properties (smaller properties) is 59% of the total provision. The total proportion of one bedroom units is 46% and is higher than the proportion of family sized units as proposed (41%). The Strategic Housing Market Assessment which has informed the emerging Local Plan notes the following mix more generally across the Borough:

9.34 On the basis of these factors it is considered that the provision of market housing should be more explicitly focused on delivering smaller family housing for younger households (2-bedroom homes) and some 1-bedroom units for younger single people and childless couples. On this basis, the following mix of market housing is recommended:

- 1-bed properties: 10-15%
- 2-bed properties: 25-30%
- 3-bed properties: 30-35%
- 4-bed properties: 25-30%

9.35 The figures can be used as a monitoring tool to ensure that future delivery is not unbalanced when compared with the likely requirements as driven by demographic change in the area. Evidently there will be sites where higher density flatted development is appropriate and as such a higher proportion of smaller 1 and 2 bed properties would likely be delivered, or vice versa taking account of local character.

6.2.40. The proposal is clearly providing for a mix of predominantly 1 and 2 bedroom apartments (95%), with a higher proportion of smaller, non-family sized 1 and 2 bedroom apartments (59%) and subsequently the proposal is considered to reflect the Council's emerging housing need evidence as set out above.

6.2.41. Furthermore, the character of the area clearly needs to be factored into considerations of the housing mix being provided and in this respect Water Lane is characterised by family sized houses. Site allocation TW7 in the TAAP as noted does not specify housing mix requirements for the site. However, it does note, within the background text, that key issues for residential uses in Twickenham (paragraph 2.2.18):

Need for family housing on suitable sites in the centre

6.2.42. Furthermore, the viability of this scheme will be a consideration and delivery of higher numbers of one bedroom units has an impact on delivery in this respect. This is considered further below alongside affordable housing provision.

6.2.43. Overall therefore the proposed mix is considered to strike the right balance of unit sizes in this area.

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6.3. Design, Form and Appearance

- 6.3.1. The Design and Access Statement that accompanies this application provides a detailed analysis of the design evolution, contextual analysis and in addition to a consideration of the form, mass, scale and appearance of the development in this sensitive location within the Conservation Area.
- 6.3.2. The proposal has been designed to address the aims and objectives of the TAAP and site constraints and opportunities. The design evolution section of the DAS describes the design process in greater detail with respects to the layout of the site and breaks down each element as illustrated in the following diagram.

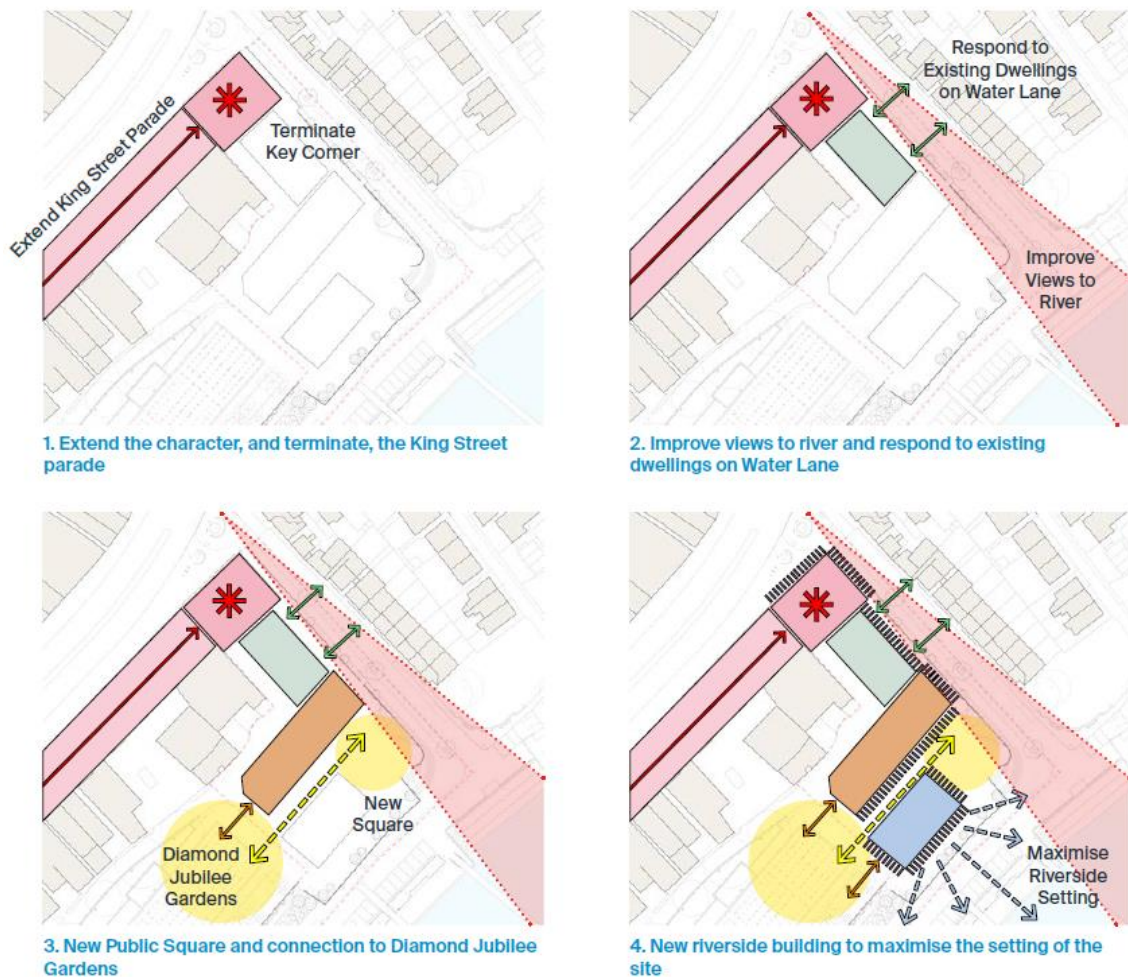


Figure 25: Design Evolution

- 6.3.3. In addressing the corner of King Street the proposal seeks to extend the character of the existing built form but furthermore seeks to provide for a significantly improved approached to terminating the King Street shopping parade. The proposal seeks therefore to replace the existing poor quality 1970s buildings with a much more attractive building which truly addresses the corner with Water Lane.
- 6.3.4. As set out in image 2 (Figure 25) above, the proposal sought to increase views to the river as well as significantly improving the pedestrian experience as one travels north and south along Water Lane. This would be achieved through significantly widened pedestrian access on this street and by stepping building back from the Water Lane frontage. This reflects the aims of the TAAP as discussed above.

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- 6.3.5. The next image demonstrates the desire to provide for a public square on site which would link to the existing open space at Diamond Jubilee Gardens via a space between Buildings A and B. Again these elements reflect the main aims of the TAAP in providing for a public square and improving linkages between the service road and Water Lane (discussed further below).
- 6.3.6. The final image illustrates the positioning of Building B which has been placed to maximise the unique riverside setting of the site and frame views through to Diamond Jubilee Gardens creating a sense of place appropriate to the context of Twickenham (and the Conservation Area within which it sits).
- 6.3.7. The DAS provides further detail in relation to the justification for the built form. In terms of heights and separation distances between buildings, it is considered that the provision of three and four storey development in close proximity is prevalent within the immediate vicinity of the area as illustrated in Figure 26. Please refer the DAS for further details.

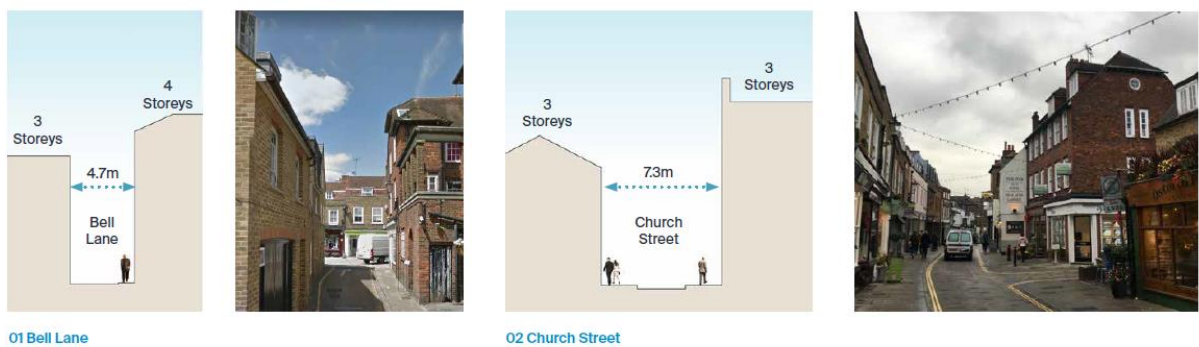


Figure 26 - Context - Building Heights and Separation Distances

- 6.3.8. The elevational treatment has also been considered in detail within the DAS in relation to the existing context and unique opportunities of the site. With respect to the elevational treatment strategy (Figure 27), the DAS notes:

The elevational strategy follows the same principles that determined the site layout for the scheme, where the different elements of the proposal respond to the differing conditions of their immediate context, as the diagram illustrates.

The King Street building (1) reflects the traditional character of the existing neighbouring parade in order to read as an extension of it, but to also to act as an endpoint in the streetscape.

The central section of the Water Lane frontage (2) has a more domestic character, in response to the residential terraces opposite, albeit of a contemporary apartment aesthetic. This acts as a transitional element between the King Street building and the terrace fronting the new public square.

The new terrace (3) plays an important part in the composition because it fronts two public spaces at its eastern and western ends as well as providing a backdrop for the riverside building.

The riverside building (4) needs to respond to its setting in the public realm, fronting two important public spaces, as well as its riverside setting, whilst still feeling as though it belongs to the townscape and conservation area.

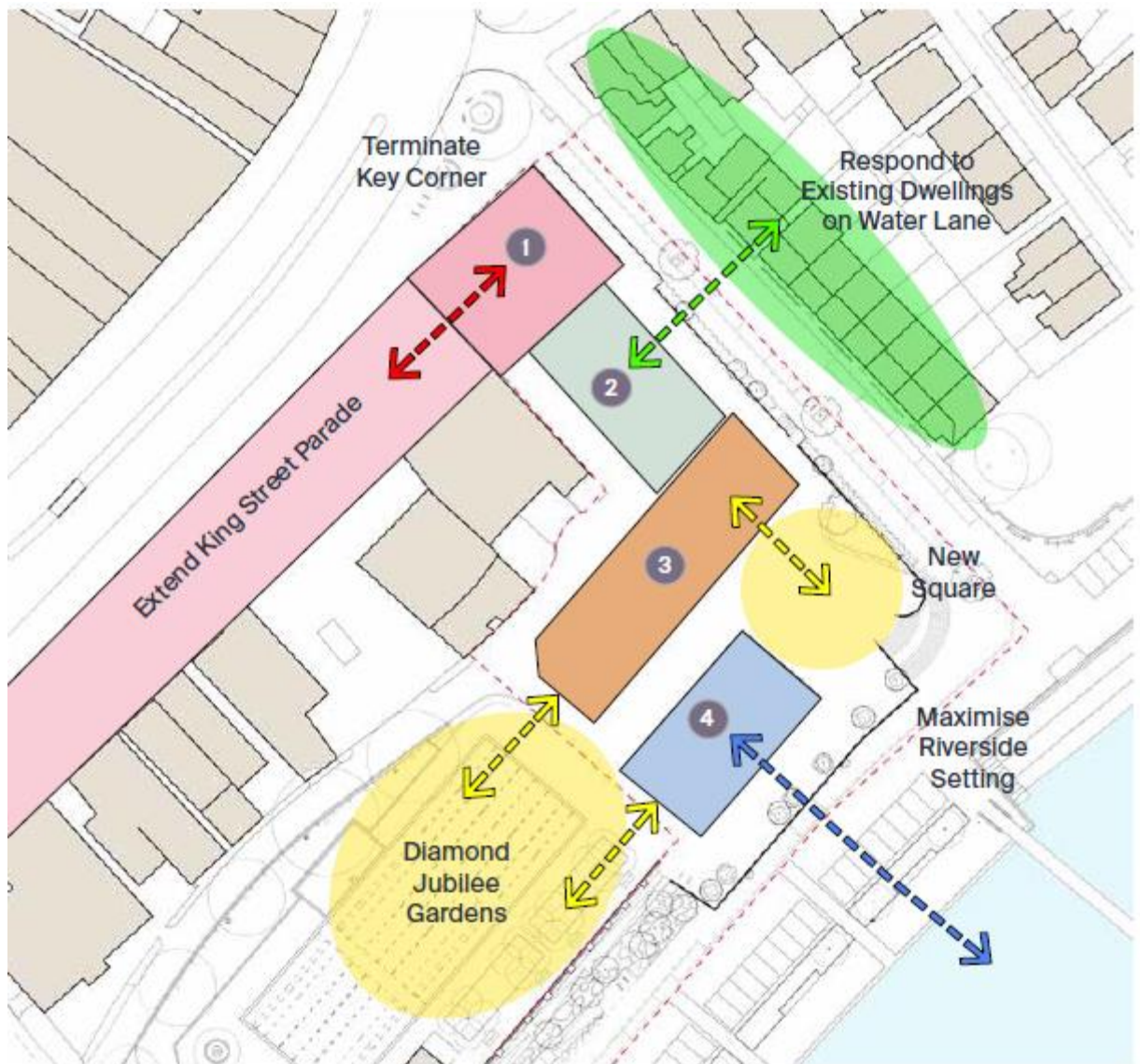


Figure 27: Elevational Strategy

- 6.3.9. Please refer to the DAS for a more detailed explanation of the elevational treatment and contextual analysis of the proposal.
- 6.3.10. In summary, the proposal seeks to provide a scheme of the highest design quality which has been developed through significant pre application discussion with the Council's Planning and Design Officers. In our view the proposal will provide a significant uplift in the overall design quality of this key site within Twickenham linking the shopping areas with the river frontage. Furthermore this proposal has been carefully considered given the context of the site within a Conservation Area and within the setting of other heritage assets.

6.4. Landscape and Open Space

- 6.4.1. The proposed landscaping and pedestrian improvements of the proposed development site are considered to be of significant benefit to future residents, existing residents and critically to visitors of the area.

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6.4.2. In land use terms, the proposal is significantly increasing the total area of public open space and pedestrian access. The following table amply illustrates this point (refer to Figure 28). Furthermore, in providing for a significant increase in public open space and improved public realm, the proposal will lead to a loss in surface car parking and currently inaccessible space.

Open Space Type	Existing (m2)	Proposed (m2)	Difference (m2)
Publically Accessible Open Space	515	1310	+ 795
Pedestrian Footways	512	1125	+ 613
Parking and Carriageways	1465	476	- 989
Inaccessible Space	806	0	- 806

Figure 28: Open Space Comparison

6.4.3. In terms of landscaping and public realm, the TAAP sets out the following aspirations relevant to the application site:

- Enhance / extend Diamond Jubilee Gardens – high quality landscaping, children’s playspace and performance / events area; -
- Along Embankment – create a pedestrian priority area;
- Water Lane – provision of civic spaces, to improve the links from the town centre,
- Water Lane / King Street – create a public square
- To conserve and enhance the Twickenham Riverside Conservation Area
- Take account of the unique river setting, create a destination on the riverside and provide space suitable for holding events,
- Link the existing service road to Water Lane;
- Create new Public Open Space and Civic Space;
- Lighting columns should complement the character of the area and create safe and attractive environment. (Principle 5); and, - Markets will be encouraged (TWP1).

6.4.4. The TAAP promotes pedestrian priority on Water Lane, Wharf Lane and the Embankment. As stated within the Landscape and Public Realm Design Strategy, the proposal does not include the entirety of Water Lane and it is not the intention of this application to provide for the pedestrian priority surface referred to within the TAAP. However, the proposals have been designed with this future improvement in mind and the development would in no way prejudice this future aspiration.

6.4.5. A key aim of the proposal is the provision of a public square that would provide sufficient usable space for events and activities to take place but which would also complement the open space provision at Diamond Jubilee Gardens. The TAAP specifically refers to this public square provision although it specifies that this should be along King Street.

6.4.6. This was initially shown in this location through the early design stages however as a deeper colonnaded area to provide such a civic space. However, following consultation it was considered that provision of a larger space to the south of the site would be preferable since it would allow for a much more genuine, open and usable space that would also act as a destination in its own right making the most of the riverside location.

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- 6.4.7. The TAAP also refers to linking the service road, located at the rear of King Street, to Water Lane. Again, this was considered as part of an earlier scheme design and was discounted for a number of reasons.
- 6.4.8. As set out in the Design and Access Statement, the shared surface 'lane' behind King Street was supported by some during the consultation whilst some disagreed with the proposed location.
- 6.4.9. Due to the levels of the site and the need for elevated finished floor levels due to flood constraints, the provision of a vehicular link to the Water Lane level created a complicated change in levels. This in turn created a convoluted pedestrian movement through the site which was considered detrimental to the overall quality of the scheme. Furthermore, the buildings north of the new link on Water Lane would have been more prone to flood risk. It also required the need for steps and an access ramp to the southern end of Water Lane resulting in a loss of useable open space and a visually abrupt and odd elevated platform to the south of the link. Lastly, the alignment of the proposed link provides for a far more legible link with the Diamond Jubilee Gardens than the previous lane alignment which connected to the service road.
- 6.4.10. Subsequently, this singular aim of the TAAP is not met as specifically conceived albeit the spirit of a pedestrian link between the two areas has been a key design requirement.
- 6.4.11. A full consideration of all other relevant policy is included within the Landscape and Public Realm Design Statement and the proposal is considered to meet the requirements of relevant policies.

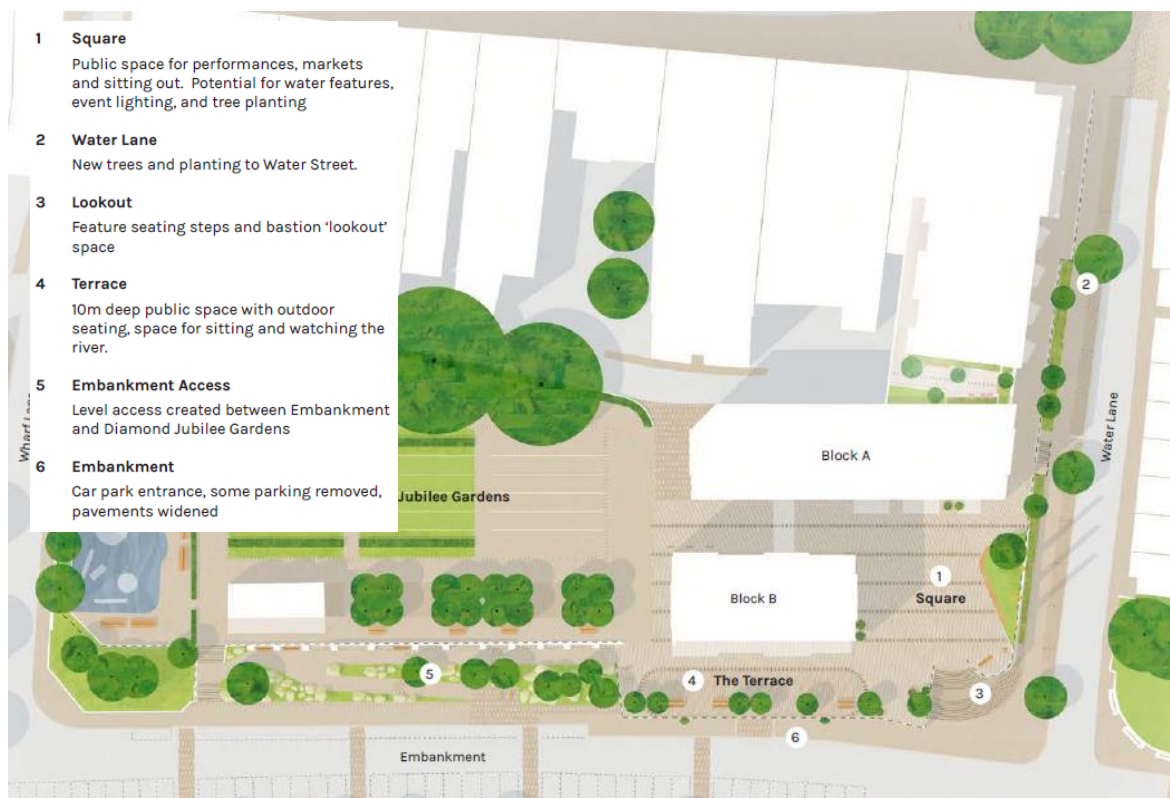


Figure 29: Proposed Landscape and Public Realm

6.4.12. As set out within the Landscape and Public Realm Design Statement, the aim of the landscape design has been to *respond to Twickenham's rich heritage and to celebrate its riverside location* inline with the requirements of the TAAP. In this context, *the site's key assets are external, being its relationship with DJG and the water - the elevated terrace provides a place to sit and watch the south-facing river*. Furthermore, the site *sits at a key junction between the historic village core, cultural Eel Pie Island, and the semi-rural riverside*.

6.4.13. The proposed landscape includes the following key elements:

Enhanced pedestrian access along Water Lane across a split, upper and lower level. This has increased the width of pedestrian access from circa 1.8m to between 6.5m and 7.5m on Water Lane and has further enhanced the links to the river from King Street.

New public square and bastion 'look out' area providing for circa 412m² of public space and a new feature step and seating area at the junction of Water Lane and Embankment. Soft landscaping, seating areas and feature lighting and furniture proposed to add interest. Potential space for future markets and spill out space for commercial units.

Riverside terrace – a south facing, river frontage area, 10m deep, offering an attractive place to sit in addition to spill out space for commercial units.

Embankment Access – providing for a 'playable landscape feature', ramped access and rock garden soft landscaping providing for access to both the site and the Diamond Jubilee Gardens.

6.4.14. All soft landscaping has been designed in line with the ecological mitigation measures (considered below). Hard surfacing materials have been considered in relation to the Conservation Area and in order to tie in with existing and surrounding areas.

6.5. Residential Amenity

6.5.1. The proposal has been fully considered with regards to residential amenity in relation to both the impact on surrounding neighbouring properties and the proposed development itself. The proposal has been assessed with regards to outlook and prospect, overlooking and inter looking, daylight and sunlight and noise implications.

Existing Properties

6.5.2. The proposed development has been assessed in relation to its impact on the surrounding properties on Water Lane, King Street and Church Street.

6.5.3. Development on Water Lane will extend further southwards than the existing retail units fronting King Street and will have a greater height and mass than the existing properties. Whilst there will be an impact of this new built form, there will also be an increased separation distance between the development on the northern element by virtue of the increased width of the pedestrian environment (by circa 4.5m – 5.5m).

6.5.4. Distances between the proposed Building A and the existing Water Lane properties are around 12m – 15m and this distance is considered acceptable in outlook terms (interlooking and overlooking) given the existing public nature of the space between the two built forms (i.e. the public highway). In terms of Building B, this distance is circa 35m and is considered entirely acceptable. These separation distances are entirely consistent with the historic pattern of development found elsewhere within Twickenham and discussed further below.

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- 6.5.5. Furthermore, the improved street environment and quality of built form proposed would be a significant improvement in terms of the appearance of the area providing for a general uplift in public realm environment and the outlook enjoyed by existing residents.
- 6.5.6. The other properties impacted by the development include properties to the north of King Street and to the south of King Street (i.e. the south facing accommodation on King Street).
- 6.5.7. It is considered that the development would have minimal impact to the outlook enjoyed by occupiers of properties to the north of King Street by virtue of the circa 25m + separation distance between the properties. In this respect, the development will only be increased by one storey in height and subsequently any impact would be minimal.
- 6.5.8. With regards to the accommodation at the rear of King Street, the ground floor accommodation of numbers 3 – 13 (odd numbers) include predominately back of house retail uses and would be therefore be minimally affected by the proposal.

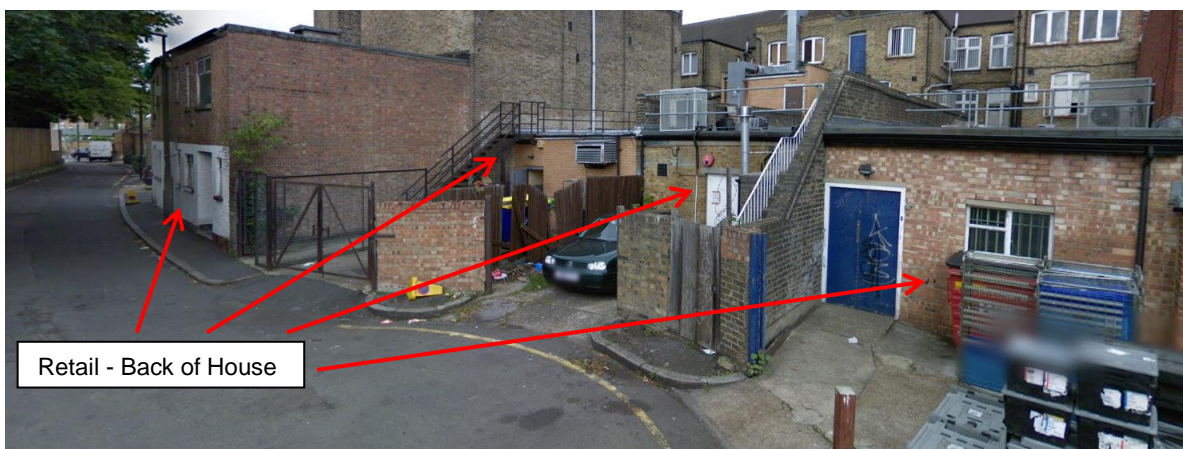


Figure 30: Service Road Rear of Properties

- 6.5.9. At first and second floors above these properties, it is our understanding that residential uses are present as illustrated within Figure 31. The most impacted properties will be those directly adjacent to the west of the proposed development and the following paragraphs refer to these properties as the worst case scenario.
- 6.5.10. There will be a mixed impact of the proposed development in outlook and prospect terms from this property (3 King Street). On the one hand, the proposal is shifting built form to the east providing a small separation between buildings that currently doesn't exist. Furthermore, the location of the external access arrangements has the effect of further removing residential uses and some element of the built form.
- 6.5.11. On the other hand, the proposal will be taller and bulkier at a small part of the development immediately adjacent to 3 Kings Street property. This will have some impact on those windows highlighted in yellow in Figure 31 at second floor level since the proposed development will be set at a higher level than existing.
- 6.5.12. The westerly window will be only marginally affected since the development is set at a circa 45 degree angle considered to be acceptable in outlook terms. The most easterly window will be most affected by the proposal and the angle of outlook will be reduced from the existing 180 degrees by circa 70 degrees of available outlook.

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Figure 31: Service Road - Residential Uses

- 6.5.13. However, at first floor level, the outlook is considered to be an improvement since there will be a greater separation distance between existing residential accommodation and the built form than currently exists. Whilst taller, the separation is considered to increase the outlook from this room
- 6.5.14. The proposal would also result in development circa 29m to the south of these properties (ie Building B refer to blue arrow Figure 32). This separation distance is considered to be significant and would not in our view result in any impact on outlook or prospect.

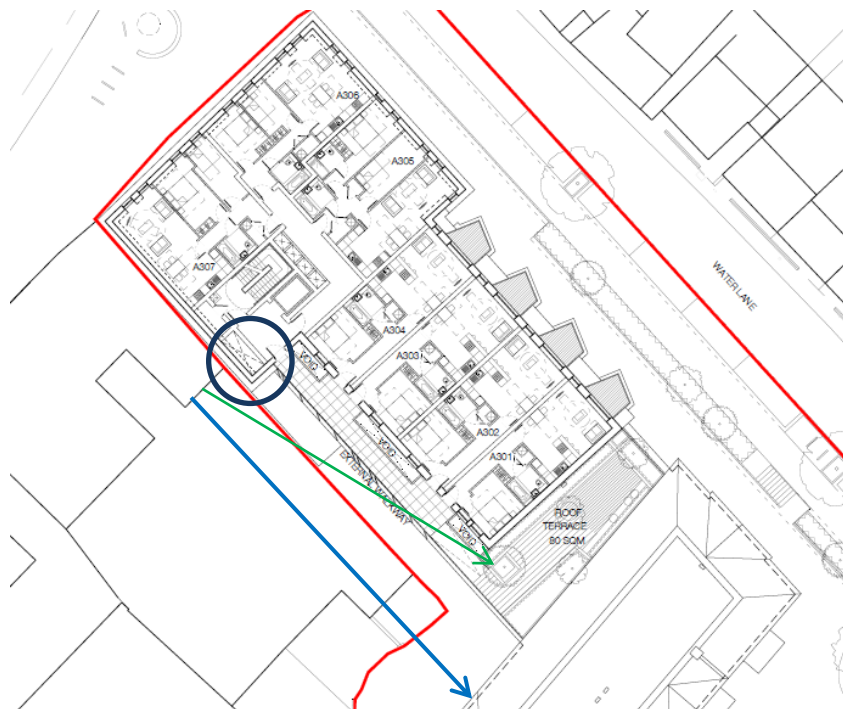


Figure 32: Residential Amenity

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- 6.5.15. In terms of interlooking and overlooking, again these windows will be most impacted by the proposed development due to the external walkway at first and second floor levels and the proposed roof terrace at third floor level.
- 6.5.16. With regards to the roof terrace, the impact will be minimal by virtue of its positioning some circa 24m away (refer to Figure 32 – green arrow).
- 6.5.17. Measures have been proposed that seek to reduce the impact from the external walkway as far as possible such as the introduction of perforated steel panels to reduce the potential for those using the walkway to look into neighbouring property windows.
- 6.5.18. Interlooking and overlooking has also been considered for the properties on Water Lane. The design of the balconies on this frontage have been angled to the south to direct views in this direction as opposed to being directed towards the existing properties. Furthermore, the separation distances of circa 12m – 15m are considered appropriate in the context of Twickenham across what is already a publically accessible space.

Proposed Properties

- 6.5.19. The proposed development has been designed to provide high quality living environment for future occupiers and residents.
- 6.5.20. The site constraints and design aspirations of the TAAP have shaped the form and mass of the proposal and significant work has been carried out to ensure the best possible internal living environment for future occupiers.
- 6.5.21. In this context, the design has been careful to ensure that the vast majority of apartments across the development are dual aspect units (69%) as illustrated within Figure 33.
- 6.5.22. Private amenity external spaces are provided for the majority of apartments (67%) in the form of balcony spaces. These have been positioned to take advantage of the view towards the Embankment and riverside. Balconies have not been provided on the King Street element and the Diamond Jubilee fronting units for design reasons (as established through pre application discussions). A significant area of public open space is however proposed throughout the site (i.e. the public square) and the provision of a semi private roof terrace for residents goes some way to offset the fact that not all apartments have balcony space.
- 6.5.23. Future occupiers will therefore enjoy a very high quality living environment, with access to the Embankment, the new public square, roof terrace and Diamond Jubilee Garden environment which would offset any lack of onsite provision of private amenity space.
- 6.5.24. In terms of interlooking and overlooking, the proposal has been careful to ensure minimal impact. In this regard, the main area of potential impact relates to the relationship between Building A and Building B.
- 6.5.25. Figure 34 illustrates the close proximity of the two residential elements of the scheme being separated by a 7m wide area of public access. This type of separation distance is common place in Twickenham as illustrated within Figure 34 and is necessary to achieve the sense of place that is characteristic of nearby streets within the Conservation Area.

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Figure 33: Dual and Single Aspect Properties

- 6.5.26. Notwithstanding this point, the internal layout has been designed to minimise impact. In this respect, the north west side of Building B on both floors feature corridor space. Any windows for this element could be obscured if considered necessary to limit impact to properties facing Building B.
- 6.5.27. The layout has been careful to ensure that properties facing Building B are dual aspect where possible. Properties on the southern element of Building A are single aspect, however, the scheme has sought to ensure that outlook for these properties is predominantly over the public square, the Embankment and river beyond.

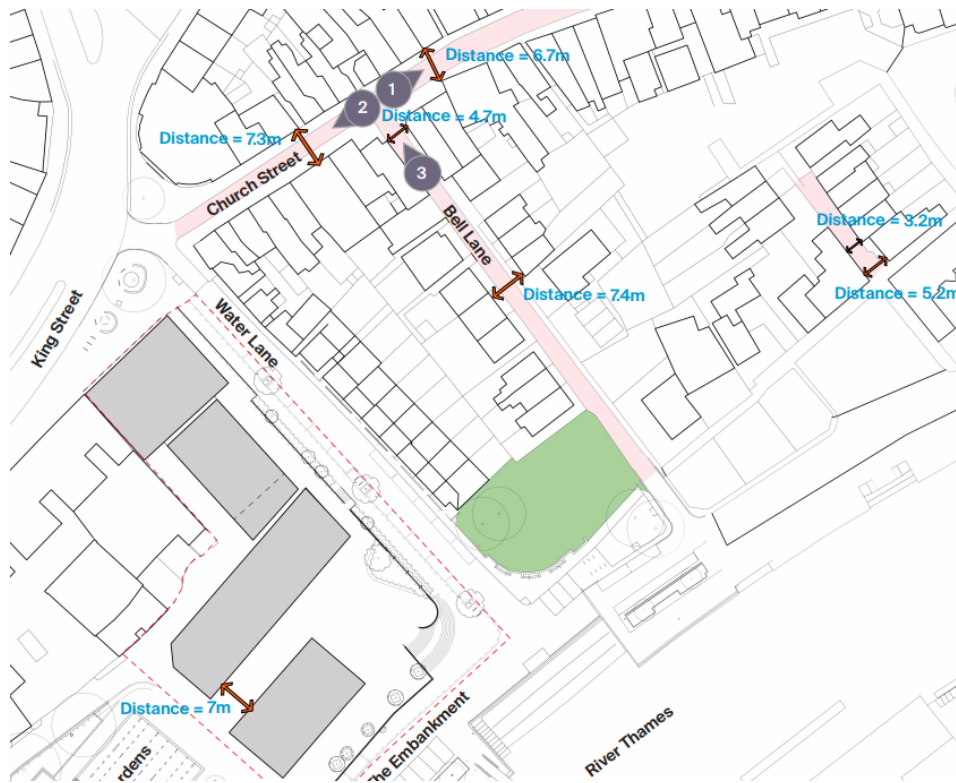


Figure 34: Separation Distances

Summary

- 6.5.28. Whilst there will inevitably be some impact on the residential amenity of existing residents, in our view the impact on outlook, prospect, inter and overlooking would not result in an unacceptable impact to the enjoyment of existing properties. The proposed development has been designed to ensure the highest possible standard of residential amenity given the constraints of the site. The proposal has been designed to meet the aims of the TAAP whilst also seeking to address the myriad other policy requirements where feasible.

6.6. Daylight / Sunlight

- 6.6.1. A Daylight and Sunlight Study (Neighbouring Properties) report has been produced to accompany this planning application. The report assessed the impact of the development on surrounding development on King Street, York Street, Church Street and Water Lane. In summary, the report noted that the development design is likely to be acceptable in daylight and sunlight terms. Furthermore, it states:

The majority of the windows tested meet or surpass the BRE numerical recommendations. Whilst some windows do not meet the recommendations, the results are not unusual in the context of an urban location. The BRE guide explains that the numerical guidelines should be interpreted flexibly, since natural lighting is only one of many factors in site layout design. The local authority should therefore balance daylight and sunlight considerations against all other material planning considerations when deciding whether to grant planning permission.

- 6.6.2. Any proposal on this site is likely to cause some transgressions with regards to daylight and sunlight given the urban grain of the surrounding area as a historic townscape. The design of the proposal has been careful to ensure that such transgressions have been reduced as far as practicable.

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6.6.3. With regards to overshadowing to gardens and open spaces, the proposed development passes the BRE overshadowing to gardens and open spaces test and is considered acceptable in this respect.

6.6.4. The proposal is also supported by a Daylight and Sunlight Study (Within Development) which considers the living environment for future occupiers of the new scheme. In conclusion, the report notes:

Right of Light Consulting confirms that the proposed development design achieves a relatively high level of compliance against the BRE recommendations. In our opinion there is no daylight/sunlight related reason why planning permission should not be granted for this scheme.

6.6.5. In summary, whilst there is some impact to daylight / sunlight of existing properties, it is our view that this impact relates only to a limited number of windows within properties and that the impact acceptable given the urban context of town centre of Twickenham and in the context of the wider regeneration benefits that the proposal brings.

6.7. Noise

6.7.1. The proposal is supported by two acoustic reports which consider the noise implications of the proposed plant on the surrounding environment and the noise break-in to the proposed residential development.

6.7.2. With regards to the noise and mechanical plant, the report notes that noise emission from the proposed plant will require noise mitigation measures in order to meet with the derived noise limits and such specification for noise mitigation measures has been provided.

6.7.3. With regards to noise break in to the proposed residential properties, a separate report has been submitted which provides details of mitigation measures required for the development in order to meet guideline internal noise levels. The report notes that glazing, ventilation measures, wall and roof cavity measures may be required on the King Street façade and north Water Lane element of the proposal.

6.8. Air Quality and Odour

6.8.1. An air quality impact assessment has been carried out to assess both construction and operational impacts of the proposed development.

6.8.2. An assessment of the potential impacts during the construction phase has shown that during this phase of the proposed development releases of dust and PM10 are likely to occur during site activities. Through good site practice and the implementation of suitable mitigation measures, the impact of dust and PM10 releases may be effectively mitigated and the resultant impacts are considered to be negligible.

6.8.3. With regards to air quality of the proposed residential dwellings, the report notes:

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ADMS Roads dispersion modelling has been carried out to predict NO₂ and PM₁₀ concentrations at the development site. The assessment has found concentrations of NO₂ are exceeding the annual mean objective at 1st floor level within the northern part of the Site, although the 1-hour objective would be met at all locations and concentrations of PM₁₀ would also meet the relevant objective at all locations within the Site. As the proposed development would locate residential receptors at 1st floor level appropriate mitigation measures are required to reduce exposure of future occupants in these locations. It is therefore recommended that the flats on the 1st floor within this part of the new building are fitted with sealed windows and mechanical ventilation, with air intakes located at roof height to ensure a clean supply of intake air (i.e. where NO₂ concentrations are below the annual mean objective).

- 6.8.4. With regards to Odour emissions from the proposed A3 units, the report states that development would:

...be fitted with an extraction system which meets the requirements of the DEFRA guidance on the 'Control of Odour from Kitchens and Exhaust Systems' including the location of any extract flue at least 1 m above the eaves of the roof of the building in which the kitchen facility is located and the incorporation of both a fine filtration system and active carbon filters.

- 6.8.5. Subsequently the proposal is considered acceptable subject to proposed mitigation measures to safeguard the residential amenity of future occupiers.

6.9. Affordable Housing Provision

- 6.9.1. Policy CP15 of the Core Strategy and policy LP 36 of the emerging Local Plan requires 50% of all housing units to be affordable housing, with a tenure mix of 40% housing for rent and 10% intermediate housing.

- 6.9.2. As set out within the following section, in meeting the wider regeneration aims of the site, the proposal will not be financially viable with such a provision.

- 6.9.3. However, despite this viability situation a total of six apartments are proposed to be affordable as part of the scheme. This provision represents a circa 15% provision of affordable housing and the indicative offer would include a mix of one and two bedroom properties. The proposed tenure is shared ownership.

- 6.9.4. The affordable housing provision has been discussed with three registered housing providers in July 2017 as follows:

- Thames Valley Housing (TVH)
- Richmond Housing Partnership (RHP)
- PA Housing

- 6.9.5. Each housing provider was asked to submit an expression of interest on the proposed Shared Ownership offer and were asked the following questions:

- *Whether the identified shared ownership units would be of interest or if not the reasons and suggested alternative units;*
- *An indicative offer for the shared ownership units and a breakdown of how this is determined and any grant assumptions made;*
- *The stage at which RHP would provide a financial commitment and on what basis;*

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- *How RHP propose the ongoing relationship between the private and affordable elements of the scheme would be managed.*

6.9.6. The applicant has received indicative offers on the units on the basis of the layouts and proposed tenures from all three providers.

6.10. Viability and Community Infrastructure Levy

6.10.1. A viability appraisal* has been produced in support of this application. In summary, the affordable housing offer is non policy compliant and has been reduced on the basis of the very significant negative viability of the scheme. However, the Applicant being the Council has a vested interest in regenerating this site and is prepared to offer a proportion of the residential element as affordable housing within the development, to bring this scheme forward whilst meeting the wider aims of the TAAP in regenerating this key site.

6.10.2. The proposal in this respect seeks to significantly improve the open space and public realm offer for this key site within Twickenham

6.10.3. Notwithstanding this point, the Community Infrastructure Levy is a non-negotiable charge on development. Only in exceptional circumstances can CIL be exempted. On this basis, the proposal is liable to pay **£807,225 of CIL (£667,730 of LBRuT CIL and £174,250 of Mayoral CIL)**. Please refer to the Appendix B for detailed calculations.

6.10.4. (*Please note, the viability appraisal documentation discloses detailed financial statements relating to the redevelopment and contains commercially sensitive information, the disclosure of which would be severely prejudicial to commercial interests in relation to Section 3 (2) of the Freedom of Information Act 2000 and therefore must not be made available to third parties.)

6.11. Flood Risk

6.11.1. The EA's flood map shows that part of the site is located in Flood Zone 3 and is at risk of flooding from the River Thames – both tidal and fluvial. In terms of tidal flood risk, the FRA states:

The present day water level at this node is 5.95m AOD and future water level, in 2100, is 6.45m AOD. New development should either include future defence raising or demonstrate that future raising will be feasible to a level of 6.9m AOD.

6.11.2. With regards to fluvial flooding the FRA states:

The maximum flood water level for the 1 in 100 year plus 35% climate change and 1 in 100 plus 70% climate change was found to be 6.908m AOD and 8.1405m AOD respectively.

6.11.3. The FRA also sets out that the proposal would need to pass both the sequential and exceptions tests as set out within the Framework. The aim of the sequential test is to direct development to those areas at lowest probability of flooding and development should not be permitted if other available sites have been identified for development.

6.11.4. The site is allocated within the TAAP for the type of uses proposed and as such would not need to pass the sequential test having already been through this process during the plan preparation process.

6.11.5. Equally, the allocation of the site provides sufficient justification under part A of the exceptions test and therefore the site is only required to pass part B of the exceptions test.

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Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓*

Key:
 ✓ Development is appropriate
 X Development should not be permitted.

Figure 35: Flood Risk Vulnerability and Flood Zone Compatibility

6.11.6. Part two of the exceptions Test requires applicants to demonstrate that the development will be safe for its lifetime taking into account the vulnerability of its users and that it won't increase flood risk elsewhere. On this point, the FRA states:

Tidal

The ground floor level has an FFL of 7.9m AOD and internal areas on the ground floor will have an FFL of 8.0m AOD, which provides 1m of freeboard above the TE2100 future defence level. The car park has an FFL of 4.75m AOD, however, the back of the car park will form the flood defence line and this will be fully accessible for inspection from the EA. Therefore, in a high storm or tidal event, the car park will flood. However, the new flood defence will ensure that surrounding properties are protected up to the TE2100 level of 6.9m AOD, plus an additional 1m. This new flood defence will be tied into the flood defence line at the east and west of the site. An automatic flood barrier at the entrance to the car park is proposed, which will be classified as a formal flood defence. However, this additional barrier will only protect the car park in flood events where the flood depth does not exceed 600mm. Therefore the flood water will enter the car park after exceeding a level of 5.635m AOD, which provides an adequate level of protection considering the low vulnerability.

Fluvial

The FFL of the ground floor podium is 7.9m AOD and the ground floor buildings have a FFL of 8.000m AOD. Therefore, in the 1 in 100 plus 35% climate change fluvial flood event, which is the design flood level, the flood level is below the ground floor FFL. Furthermore, more than 300mm freeboard is provided between the design flood level and the FFL.

The 1 in 100 plus 70% climate change flood levels should also be considered for the more vulnerable parts of the development. In this rainfall event, the lower ground floor car park and seasonal units flood. However, the "More Vulnerable" parts of the development are above this flood level, as they are proposed at first floor and above. It should be noted that the chances of this flood level to occur is very low, currently estimated at 10%. The proposal is therefore considered to pass the requirements of the exceptions test and is considered acceptable in flooding terms

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6.11.7. The proposal is therefore considered acceptable in flood risk terms on the basis that the mitigation measures outlined within the FRA are implemented.

6.12. Heritage

6.12.1. A Heritage Statement has been produced in support of this planning application which assesses the potential effects of the proposal on the archaeological and heritage assets of the site and its surroundings.

6.12.2. In archaeological terms, the site has been highlighted to have high archaeological potential with a moderate to high probability of medieval evidence being encountered during the course of development. The heritage assessment therefore recommends that a programme of trial trenching evaluation be carried out prior to development.

6.12.3. As noted previously, the site is located within the Twickenham Riverside Conservation Area (No. 8) and the Conservation Area Statement in relation to the site notes the development potential of the site and states:

Visual, as well as physical links to the centre of Twickenham also perform an important function in tying the river to the settlement's historic core on the terrace. There are design opportunities for the pool site, temporarily landscaped, which would strengthen these links as well as restoring a use sympathetic to its riverside location.

6.12.4. In addition there are a number of listed and non-statutorily listed buildings within the vicinity of the site although it should be noted that there are none located within the red edge boundary of the site itself.

6.12.5. The Heritage Assessment considers the impact of the proposal on both the listed buildings (both statutory listed and non-statutory listed) and the Conservation Area. The Assessment concluded that the existing structures and uses represented negative features within the Conservation Area. Furthermore, the assessment establishes that the increased visual and physical links between the historic core and riverside would result in a direct Moderate beneficial effect on the character of the Twickenham Riverside Conservation Area.

6.12.6. In relation to the potential effects on the settings of surrounding Listed Buildings and the Queens Road Conservation Area, the assessment identified a range of effects ranging from Minor beneficial to Neutral.

6.12.7. Subsequently, in line with the Framework, the proposal maintains and enhances the historic environment and is considered acceptable in this respect. Any potential effect must also be considered against the significant public benefits of the scheme.

6.13. Ecology

6.13.1. The application is supported by a Preliminary Ecological Assessment and, following the results of this assessment, a Bat Survey.

6.13.2. In habitat terms, the site is not subject to any statutory or non-statutory nature conservation designations and represents a predominantly hard surfaced, urban environment. However, the site does include an area of self-seeded trees considered to be of only local value. The PEA in this respect states:

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Habitats present are considered to be of local value only and include lowland mixed deciduous woodland and a hedgerow which are Habitats of Principal Importance and Richmond Biodiversity Action Plan habitats.

- 6.13.3. The proposal will lead to the loss of this small area of woodland. Following the principal of 'no-net-loss' the PEA recommends that compensatory habitat must be established on site. The PEA has considered the landscaping proposals put forward as part of the scheme including the provision of trees and the hedgerow and states that: only native species of tree and hedging species (at least 5) should be used for this planting and, where possible, the scattered trees should be supplemented by an understorey of native forb species.
- 6.13.4. Further recommendations of the report seek to enhance the biodiversity value such as the inclusion of sustainable drainage systems (including green roofs), landscape planting of recognised wildlife value; the provision of bird nesting opportunities; and wildlife-friendly fencing.
- 6.13.5. In relation to breeding birds, the report noted:

Breeding birds were confirmed as being present. Buildings and vegetation have potential to support breeding birds. In order to comply with legislation, where these habitats are to be removed this should take place September to February inclusive which is outside of the main bird breeding season. Where this is not possible, a check for nesting birds prior to vegetation clearance must be undertaken by an experienced ecologist and, if any nests are found, the nests must be protected until such time as the young have left the nest.

- 6.13.6. The PEA noted some potential for roosting bats in buildings and trees and recommended further survey work to be undertaken and subsequently a Preliminary Roost Assessment was undertaken and concluded that the development proposals are unlikely to have any significant impact on the favourable conservation status of the local bat population.
- 6.13.7. The recommendations of the PEA and Preliminary Roost Assessment have been considered throughout the design of the proposal.

6.14. Arboriculture

- 6.14.1. As set out above, a small group of naturally regenerated Sycamore and occasional Goat Willow, many of which are multi-stemmed occupy the vacant part of the former pool site within site. This group of trees and four other individual trees are proposed for removal. The Arboricultural Impact Assessment notes the following:

One tree group (G009) and 4 individual trees (T008, 014, 015 and 034) are to be removed to enable the development.

- 6.14.2. None of the trees on site are Tree Preservation Order trees, however are located within a Conservation Area offering statutory protection.
- 6.14.3. Group 009 have been assessed as lower quality C grade trees. Tree 08 is of moderate quality and is assessed as a B grade tree whereas all other trees requiring removal are of C grade quality. The AIA considers the loss of these trees and notes their modest contribution to the visual amenity of the area.
- 6.14.4. Whilst their loss will have a small negative impact on the visual amenity of the site, it is our view that the proposed high quality design of the development and the exceptional standard of the hard and soft landscaping proposed will mitigate this loss.

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6.14.5. The Design and Access Statement notes the following:

In line with LB Richmond policies, the proposal is to replace trees which are being removed 1:1 or more. The proposal adheres to the principles contained in the London Plan of 'right tree, right place' and carefully ensures that none of the proposed trees will grow up to dominate any particular building or space, minimising future liabilities.

6.14.6. The ornamental planting scheme will be designed to be ecologically rich with seasonal interest and structure which complements the public realm. Further details are contained within the Landscape Strategy and Design and Access Statement.

6.15. Transport, Highways and Accessibility

6.15.1. The application is supported by the following documents related to highways, access and travel:

- **Transport Assessment**
- **Residential and Commercial Travel Plans**
- **Inclusive Access Statement**

6.15.2. The Site is in a Town Centre location within Twickenham and has excellent public transport connectivity (PTAL 5-6a) in addition to high-quality pedestrian and cycle infrastructure.

6.15.3. The proposals seek to formalise the existing poorly coordinated and managed servicing arrangements to King Street units and minimise car parking dominance in surrounding roads by converting the existing servicing road to a cul-de-sac with restricted access, providing two new loading bays (one on Water Lane and one on Wharf Lane) and reducing or reallocating existing on-street parking.

6.15.4. The proposal will subsequently lead to the loss of a private, 26 space car park on site in addition to 11 on street parking spaces (although it must be noted that this results in the provision of two new loading bays and five new residents bays – the loss of spaces relates predominantly to pay and display spaces and shared use bays).

6.15.5. The proposal subsequently seeks to provide 23 car parking spaces within the lower ground floor car park as follows:

- **1 car parking space for each 2-bedroom or 3-bedroom unit, with the exception of the affordable units (19 spaces for 19 units);**
- **2 Blue Badge parking spaces for staff of the proposed retail units; and**
- **2 spaces to be allocated either to residents or staff members, subject to future demand.**

6.15.6. The Transport Assessment provides a full justification for this level of parking in relation to policies CP 8 and 9 which note that higher density development in areas of good public transport should be car free and DM TP 8 which requires new development to demonstrate that new schemes provide an appropriate level of off street parking to avoid on street implications (and Principle 2 of the TAAP). All car parking bays will have passive electric provision, with 4 spaces (20%) provided with active provision – this exceeds the policy requirement of 20% passive connection.

6.15.7. A total of 68 long stay cycle spaces are proposed for the residential and commercial uses in line with London Plan requirements. A further 26 spaces are proposed for short stay visitors exceeding requirements.

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- 6.15.8. A clear benefit of the scheme is the increased permeability of the site and the creation of a high quality accessible pedestrian environment.
- 6.15.9. The Transport Assessment also considers the impact of the proposal in terms of future trip generation. It demonstrates that the majority of trips will be undertaken by foot and public transport with minimal car movements likely within peak hours. The Transport Assessment states:

This trip generation exercise has indicated that the Proposed Development will have a negligible impact on the highway and public transport network, but will result in a substantial increase in pedestrian trips to the Site.

- 6.15.10. The proposal is considered acceptable in transport and highway terms.

6.16. Delivery and Services

- 6.16.1. The Site is in Twickenham Town Centre, and is currently serviced from King Street, Water Lane and the private car park on Site. The adjacent developments (King Street retail units and Eel Pie Island) are serviced from King Street, Wharf Lane, the Service Road and the Embankment.

- 6.16.2. The application is accompanied by a Delivery and Servicing Plan which states:

Servicing surveys undertaken at the Site raised highway safety issues with regards to current servicing activity on Wharf Lane and the Service Road, in particular conflicts with non-motorised vulnerable users.

To address these safety concerns, a wide range of options were considered for the servicing and delivery strategy of the Site and of the adjacent M3 Capital properties. Given the level and land ownership constraints, on-street servicing was deemed to be the only option which guaranteed the safety of all users.

Therefore, as part of the Proposed Development, the Service Road will be converted to a Service cul-de-sac, with traffic restricted to essential users (refuse collection, residents and staff and emergencies). A turning head has been provided on Site, allowing vehicles to enter and exit the Service cul-de-sac in forward gear.

Two new loading bays are proposed on Water Lane and Wharf Lane, minimising servicing activity on the cul-de-sac, formalising existing servicing activity on Wharf Lane and ensuring servicing vehicles do not encroach footways and cycle lanes.

Refuse collection will take place on the service cul-de-sac, with waste operatives able to drive to within 10m of the refuse stores.

A servicing trip generation assessment has been undertaken, indicating that the Proposed Development will be serviced by approximately 40 vehicles on a daily basis. The final figure and the type of vehicles are likely to change subject to the final occupiers.

In summary, the servicing and delivery arrangements for the Proposed Developments aim to resolve existing highway safety issues and minimise conflicts with non-motorised users, creating an environment that is less vehicle-dominated, in line with policy requirements.

- 6.16.3. Subsequently, the proposal will result in an improvement to the existing poorly coordinated, unmanaged and unsafe delivery and servicing arrangements and is considered to be a benefit of the scheme.

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6.17. Contaminated Land

- 6.17.1. The application is accompanied by a Ground Investigation Report. The report identifies that contaminated land was identified on site. It states:

Contamination testing has revealed no elevated levels of contaminants within the soil samples tested, although raised levels of TPH and PAH were encountered within the natural soils at 3.7 m and 4.7 m. Groundwater samples recovered from each of the standpipes revealed soluble PAH and TPH contamination toward the south of the site. The source of the contamination may be able to be removed as part of the proposed basement scheme but it is more likely that additional testing will be required to identify and locate the source of the contamination. Once the source is identified a full remediation strategy and validating testing can be completed.

- 6.17.2. Further testing would therefore be required should the application be permitted and this could be ensured through an appropriately worded condition.

6.18. Energy and Sustainability

- 6.18.1. The planning application is accompanied by an Energy Strategy Report, a BREEAM pre assessment report and a Sustainable Construction Checklist. The Energy Strategy Report sets out the proposed approach to follow the energy hierarchy in the development in order to meet the requirement for commercial and residential development. The report states:

The proposed strategy has the potential to provide a 42% and 15% improvement over the Building Regulations 2013 minimum target for the residential and non-residential parts of the development respectively; through passive design measures, energy efficient equipment and renewable technologies.

Renewable technologies have been specified to achieve a 20% reduction in site wide CO2 emissions and generate 11.65% of the total energy consumption of the development.

- 6.18.2. The approach to renewable energy is to include solar photovoltaic panels for the residential units while an air source heat pump shall be provided for the commercial units.
- 6.18.3. The proposal is also accompanied by a BREEAM Pre-Assessment Report for the commercial new build elements of the scheme. This report demonstrates that the building has the potential to achieve a score of 71.83%, which equates to an Excellent BREEAM rating.
- 6.18.4. This provides a small buffer over the target score of 70% (the threshold for an Excellent rating) should credits be lost through design or cost constraints as the project progresses.
- 6.18.5. A Sustainable Construction Checklist is also submitted as part of this application and scores a 54 placing it on the borderline of making a major contribution towards achieving sustainable development within Richmond.

6.19. Summary

- 6.19.1. The design of the proposal has considered in detail the policy requirements in addition to the unique constraints and opportunities of this key regeneration site. The proposal is considered to provide a significant uplift in the design quality of the area, creating a destination of the site, making the most of the unique riverside setting and providing for increased and enhanced areas of public realm and open space. This section has covered in detail the planning matters relating to the proposal and the scheme is considered to provide multiple benefits which would outweigh any perceived impacts.

7. Conclusions

- 7.1. This Planning and Affordable Housing Statement has been prepared by ECE Planning Ltd on behalf of the London Borough of Richmond Upon Thames in support of a:

Full planning application for the demolition and removal of all existing buildings and structures and redevelopment with a mixed use development of the site at 1A, 1B King Street and 2/4 Water Lane; the site of the remaining former swimming pool buildings at the corner of Water Lane and The Embankment; and the river-facing parcel of land on the Embankment in front of Diamond Jubilee Gardens. The development proposals comprise: three seasonal units (201m²) at Lower Ground Floor level; 505m² A3 floor space, 250m² B1 floor space, 244m² A1 floor space and 62m² flexible commercial at ground floor level; 39 residential apartments at first, second and third floors (18 no. 1 bedroom, 19 no. 2 bedroom and 2 no. 3 bedroom, including six no. affordable homes); new public square / areas of public realm throughout the site; a Lower Ground Floor car park with new vehicular access from The Embankment consisting of 23 car parking spaces and cycle storage; reconfiguration of street parking in the roads immediately adjacent to the Site; amended pedestrian access and landscaping to the South of Diamond Jubilee Gardens; and amendment of service vehicle access to the service road at the rear of Diamond Jubilee Gardens.

This statement has set out the relevant background for the determination of the planning application, including a description of the site and its surroundings, the relevant planning history, relevant planning policy, details of the development proposed suitable for a full application, and an assessment of the relevant planning considerations.

- 7.2. The proposal seeks to meet the requirements of the Twickenham Area Action Plan (which sets out the site specific policy) in addition to meeting the requirements of other adopted local, regional and national policy. This is achieved through a re-provision / new offer of active uses at the ground floor level with increased residential across the site in addition to large areas of high quality, landscaped public realm including a new public square.
- 7.3. The proposed design of the development has evolved following detailed discussions with the Council's Planning Officers in addition to significant public consultation. The design is considered to respond to the requirements of the TAAP, the site context within a Conservation Area and within close proximity to Listed Buildings and the flood risk experienced.
- 7.4. The proposal will lead to the widening and substantial improvement of the Water Lane environment, providing for significant new areas of open space, re-providing employment floor space and encouraging uses that will draw visitors from the town towards the riverside. The large public square offers opportunities for event / performance space and is considered to be a significant benefit of the scheme.
- 7.5. The lower ground car park will ensure that the proposal reduces the impact on onstreet parking acknowledging the highly sustainable location of the site.
- 7.5.1. The proposal has been is considered to be acceptable in design and residential amenity terms as set out within the preceding chapter. Whilst there will inevitably be some impact on the residential amenity of existing residents, in our view the impact on outlook, prospect, inter and overlooking would not be unacceptable.

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- 7.5.2. The scheme is considered to be of a high quality and has been sensitively considered with respects to the requirements of the TAAP and site constraints and opportunities. The design is considered to enhance the local character of the area and furthermore enhance the character and settings of the heritage assets in close proximity of site (such as Conservation Areas and Listed Buildings).
- 7.5.3. The proposed development has been designed to ensure the highest possible standard of residential amenity given the constraints of the site. The proposal has been designed to meet the aims of the TAAP whilst also seeking to address the myriad other policy requirements where feasible.
- 7.6. The design of the scheme has been cognisant of the flood and heritage and other constraints to the site as considered within the planning appraisal section of this Statement. In conclusion, the proposal is considered to provide a significantly wide range of regeneration benefits and would fully meet the site specific aspirations and aims of the TAAP where relevant without jeopardising the wider objectives of the site allocation.
- 7.7. It is considered that the proposed scheme provides for an exceptionally high quality public realm environment encouraging visitors and members of the public to enjoy the unique opportunities that this riverside site has to offer and we respectfully request that this planning application is approved.

Appendix A – EIA Screening Opinion

2 June 2017

Dear Chris Barker

**RE: TWICKENHAM RIVERSIDE SITE - FORMAL REQUEST FOR
SCREENING OPINION UNDER REGULATION 6 OF THE TOWN AND
COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2017 (EIA Regulations)**

Thank you for your letter and the attached plans received on 8 May 2017 requesting a formal screening opinion concerning the above site and its mixed use redevelopment, consisting of:

- New commercial floor space on the ground floor comprising A1, A2 and A3 and inclusion of some B1 incubator space totalling an area of no more than 1500m².
- Residential uses on upper floors with the provision of up to a maximum for 50 units comprising a mix of 1, 2 and 3 bed units.
- The development ranges in height with a maximum of 4 storeys. The overall height of the buildings will be no more than circa 22m.
- Public realm enhancements to improve the pedestrian links from King Street to The Embankment and through to the Diamond Jubilee Gardens.
- Public open space / performance space for community uses
- Underground basement car park for no more than 55 car parking spaces.
- Surface car parking near the site will be rationalised to address both existing and future demands.
- Servicing and delivery of the scheme will be secured via both Water Lane to the east and the service road from Wharf Lane to the west.

I attach the Local Planning Authorities Screening Opinion adopted on the 2 June 2017, which concludes the proposed development is not deemed to be a Schedule 1 or 2 development, nor an EIA development, as defined by the EIA Regulations. In line with NPPG, an **Environmental Impact Assessment is not required**, and does not need to be further screened. In line with Regulation 5 (5) of the above EIA Regulations, the accompanying Screening Opinion outlines:

- The main reasons for this conclusion; and
- Any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment.

Yours sincerely


Robert Angus
Head of Development Management

LONDON BOROUGH OF RICHMOND UPON THAMES

**ENVIRONMENT AND COMMUNITY SERVICES, PLANNING AND TRANSPORT -
DEVELOPMENT MANAGEMENT (PLANNING)**

**FORMAL SCREENING OPINION IN CONNECTION WITH THE TWICKENHAM
RIVERSIDE SITE, TWICKENHAM (REGULATION 6)**

PREAMBLE:

In line with regulation 6(2), the request for the screening opinion was accompanied with:

- (a) A plan sufficient to identify the land
- (b) A description of the development, including
 - i. a description of the physical characteristic of the development and where relevant demolition works.
 - ii. A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.
- (c) A description of aspects of the environment likely to be significantly affected by the development
- (d) A description of any likely significant effects resulting from:
 - i. Residues / emissions and waste (where relevant)
 - ii. Use of natural resources
- (e) Such information the person making the request may wish to provide, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

SITE:

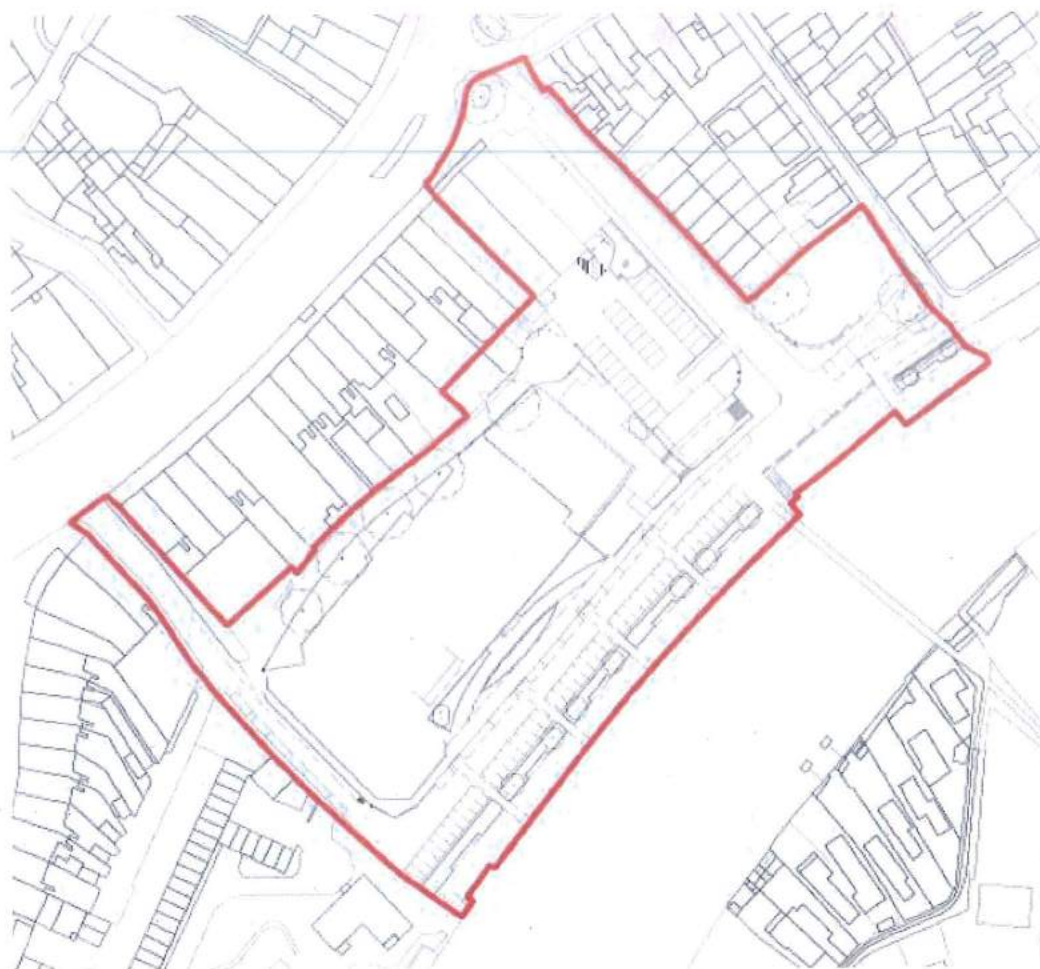
ECE Planning has provided a site plan identifying the site boundaries (Figure 1) and description of the location of the development:

The Agents advise that the application area will be of a reduced scale, and the area below has been identified for completeness to ensure that the site and any associated proposals would not be considered EIA development when considered cumulatively. The total area is 1.4ha.

The site is located in Twickenham town centre, on the corner of King Street, Water Lane and The Embankment, incorporating commercial units on King Street and Water Lane, a private car park to the rear of the units, and the former swimming pool buildings on the riverside land fronting The Embankment.

The site is partially at risk of flooding on its southern extreme boundary and is located within Twickenham Riverside Conservation Area. Riverside proposals will be required to improve biodiversity. Riverside proposals will need to ensure that there is no impact on these designations.

Figure 1



In addition, the site has the following designations:

- Key shopping frontage
- Within Twickenham Town Centre
- Within an Article 4 Direction Area – removing permitted development rights from B1a to C3
- Within Twickenham Riverside Conservation Area
- Archaeological Priority Area
- Previous Industrial Land Use
- Flood Zones 2 and 3

The site is adjacent to or within the setting of the following designations:

- Within the setting of Queens Road Conservation Area
- Within the setting of Listed Buildings and Buildings of Townscape Merit (BTMs)
- Adjacent to Thames Policy Area
- Adjacent to Metropolitan Open Land (MOL) – River Thames
- Adjacent to Other Site of Nature Importance – River Thames

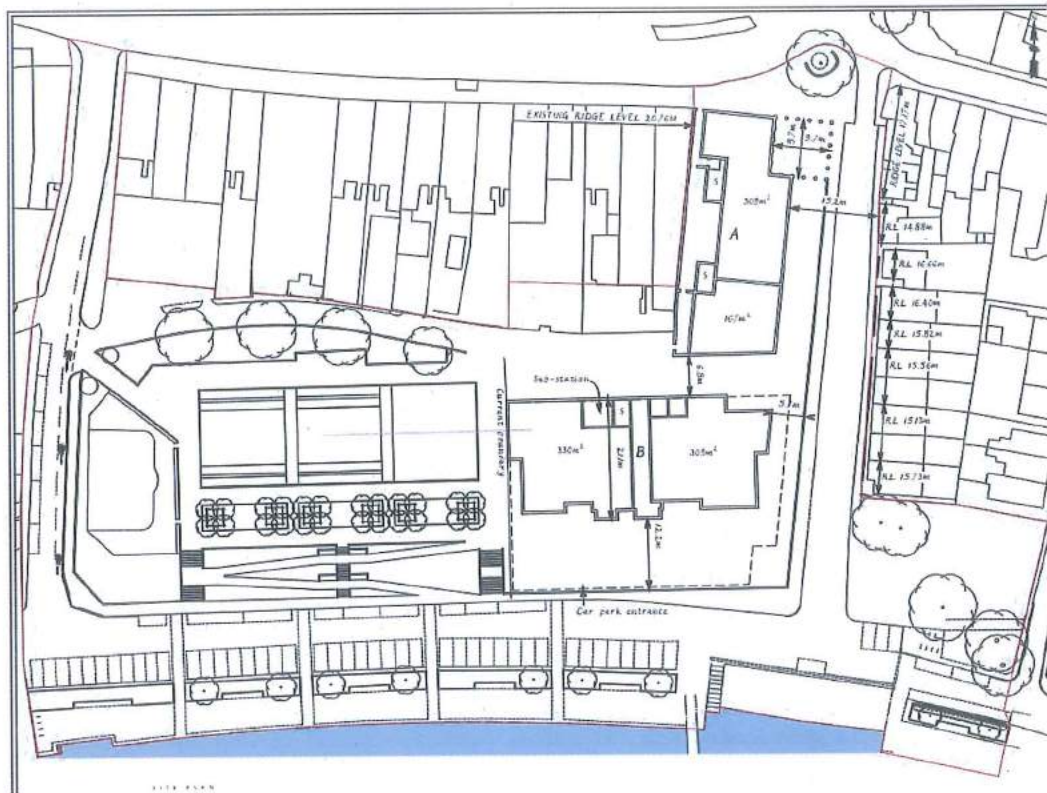
PROPOSED DEVELOPMENT:

Mixed-use redevelopment consisting of:

- New commercial floor space comprising A1, A2 and A3 and inclusion of some B1 incubator space totalling an area of no more than 1500m²
- Maximum for 50 units comprising a mix of 1, 2 and 3 bed units
- Public realm enhancements
- Public open space / performance space for community uses
- Underground basement car park for no more than 55 car parking spaces
- Surface car parking near the site will be rationalised to address both existing and future demands
- Servicing and delivery of the scheme will be secured via both Water Lane to the east and the service road from Wharf Lane to the west.

A description of the physical characteristics was provided including:

- An indicative site layout;



- Indication of scale – the proposed development ranges in height with a maximum of four storeys, with an overall height of the buildings will be no more than circa 22m.

DEFINITIONS AND GUIDANCE:

The EIA Regulations (2) states, "EIA development" means development which is either –

- (a) Schedule 1 development; or
- (b) Schedule 2 development likely to have significant effects on the environment by virtue of facts such as its nature, size of location.

"Schedule 2 development" means development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where –

- (a) Any part of that development is to be carried out in a sensitive area;
- or
- (b) Any application threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development

"Sensitive area" means any of the following:

- (a) land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981
- (b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949
- (c) the Broads
- (d) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage;
- (e) a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979;
- (f) an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000 as confirmed by the Secretary of State;
- (g) a European site;

When a project exceeds the thresholds in Schedule 2 or is within a sensitive area, the NPPG states,

If a proposed project is listed in the first column in Schedule 2 and exceeds the relevant thresholds or criteria set out in the second column (sometimes referred to as 'exclusion thresholds and criteria') the proposal needs to be screened by the LPA to determine whether significant effects