

**Arlington Works,
Arlington Road,
Twickenham, TW1 2BB**
Planning Statement (including
Heritage Statement and Statement
of Community Involvement)
August 2018

indigo.

**Arlington Works, Arlington Road,
Twickenham, TW1 2BB**
Planning Statement (including Heritage
Statement and Statement of Community
Involvement)
August 2018

Indigo

indigo.

Aldermay House
10-15 Queen Street
London EC4N 1TX

T 020 3848 2500
E info@indigoplanning.com
W indigoplanning.com

**Arlington Works, Arlington Road,
Twickenham, TW1 2BB**
Planning Statement (including Heritage
Statement and Statement of Community
Involvement)

Contents	Page
1. Introduction	1
2. Site context	2
Site description	2
Planning history	3
3. Statement of Community Involvement	4
Policy context	4
Pre-application feedback	4
Public consultation	5
Consultation responses	5
Summary	6
4. Proposed development	7
Commercial space	7
Residential	7
5. Development Plan	9
NPPF (2018)	9
London Plan (2016)	9
Richmond Local Plan (2018)	10
West London Waste Plan (2015)	10
Other Supplementary Planning Documents	10
Emerging Policy	10
6. Planning Assessment	11
Principle of Development	11
Affordable housing	14
Mix and quality of proposed living accommodation	15
Design	17
Transport and parking	17
Sustainability and energy	18
Flooding	19
Ecology and Trees	19
Contamination	20
Air Quality	20
7. Heritage Assessment	21
Legislation and policy	21
Buildings of Townscape Merit	21
St Margaret's Conservation Area	22
Church of St Margaret's (Grade II)	22
Summary	22
8. Conclusion	23

**Arlington Works, Arlington Road,
Twickenham, TW1 2BB**
Planning Statement (including Heritage
Statement and Statement of Community
Involvement)

Appendices

Appendix 1

Written pre-application feedback dated 12 February 2018

Appendix 2

Public exhibition leaflet

Appendix 3

Public exhibition leaflet distribution map

Appendix 4

Public exhibition boards

1. Introduction

- 1.1. This Planning Statement has been prepared by Indigo Planning on behalf of Sharpe Refinery Service Ltd to support a planning application at Arlington Works, Arlington Road, Twickenham.
- 1.2. Planning permission is sought for the:
- “Redevelopment of the site to provide 610sqm of commercial space (B class) within existing Buildings of Townscape Merit plus a new built unit, 24 residential units (5 x 1 bedroom, 12 x 2 bedroom and 7 x 3 bedroom) and associated car parking and landscaping.”*
- 1.3. This Planning Statement comprises a comprehensive analysis of the proposed development against relevant planning policies and material considerations. It also includes a Heritage Statement and a Statement of Community Involvement.
- 1.4. This application is also supported by the following documentation:
- Signed and completed planning application form;
 - Existing and proposed plans (including Site Location Plan), prepared by Brookes Architects;
 - Design and Access Statement, prepared by Brookes Architects;
 - This Planning Statement (including Heritage Assessment and Statement of Community Involvement), prepared by Indigo Planning;
 - Health Impact Assessment, prepared by Indigo Planning;
 - Affordable Housing Statement and Viability Report, prepared by Grimshaw Consulting;
 - Transport Assessment, prepared by Caneparo Associates;
 - Construction Logistics Plan, prepared by Caneparo Associates;
 - Flood Risk Assessment and Statement of Sustainable Urban Drainage, prepared by Paul Garrad;
 - Marketing Report, prepared by Featherstone Leigh;
 - Energy Report including Sustainable Construction Checklist and BREEAM Pre-assessment, prepared by Bluesky;
 - Land Contamination Assessment, prepared by Leap;
 - Foul Sewage and utilities statement, prepared by Glanville;
 - Ecology Report, prepared by Arbtech;
 - Tree Survey & Constraints Plan, prepared by Arbtech;
 - Aboricultural Impact Assessment and Aboricultural Method Statement, prepared by Arbtech;
 - Tree Protection Plan, prepared by Arbtech;
 - Acoustic (noise + vibration) Assessment, prepared by Aulos Acoustics;
 - Air Quality Assessment, prepared by WSP;
 - Archaeological Statement, prepared by AB Heritage;
 - Topographical Survey, prepared by Sunshine Survey Ltd; and
 - Waste report, prepared by Waterman.
- 1.5. The requisite planning application fee has been sent directly to the Council under separate cover.

2. Site context

Site description

- 2.1. The site comprises structures associated with the treatment of waste oil and a combination of B1 uses. However, the oil recycling business is less viable, employing only a skeleton staff as it plans for closure later this year.



- 2.2. The site is bound to the north-west by a railway line and to the south-west by the Twickenham Studios and the St Margaret's Local Centre. The surrounding area is predominantly residential.
- 2.3. Vehicular access into the site is via a long driveway accessed from Arlington Road, past the Twickenham Studios and adjoining residential development to the north.
- 2.4. The site is not situated within a conservation area, and none of the existing buildings are statutorily listed. However, the two mews buildings located within the southern area of the site, were designated as Buildings of Townscape Merit (BTM's) in November 2013.
- 2.5. St Margaret's Conservation Area is situated approximately 20m to the north of the site, but is separated by the railway line. The nearest statutorily listed building is the Grade II Listed Church of St Margaret's of Scotland, which is approximately 50m to the west, but is again separated by the railway line.
- 2.6. The site has a Public Transport Accessibility Level (PTAL) score of 3, which is defined by the London Plan as 'moderate'. The nearest bus stops are located on St Margarets Road and St Margarets Train Station is approximately an 8 minute walk from the site, providing an important link to central London via Richmond.
- 2.7. The site is within flood zone 1 and therefore has a low probability of flooding.

Planning history

- 2.8. The site has an extensive planning history, however most decisions are not relevant to this application.
- 2.9. A Certificate of Lawful Use or Development (LPA Ref: 94/2139/S191) was granted on 23 August 1994 that defines the lawfully permitted area at Arlington Works that is for the 'waste use'. The decision notice and plan for this CLUED is included within the Waste Report, prepared by Waterman at Appendix C.
- 2.10. This CLUED is integral in considering the permitted waste area and will be referred to subsequently in this Planning Statement.
- 2.11. The only other recent applications made in relation to the site propose alterations to antennas, masts and other communication equipment situated within the north-western corner of the site.

3. Statement of Community Involvement

Policy context

- 3.1. The comprehensive pre-application process undertaken by the applicant and the project team has considered relevant national and local policy and guidance. The importance of pre-application consultation and community engagement are emphasised in the following national and local policy and guidance:
- Community Involvement in Planning: The Government's Objectives (2004);
 - Localism Act (2011);
 - National Planning Policy Framework (2018); and
 - Richmond upon Thames Statement of Community Involvement (SCI) (2006).
- 3.2. The Localism Act states that developers have a duty to take account of the responses to pre-application consultations and use them when developing proposals. The Act also clarifies the position relating to pre-determination by councillors and encourages elected members to play an active role in discussions on schemes at pre-application stage.
- 3.3. Paragraph 128 of the NPPF states that applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of new development should be looked on more favourably.
- 3.4. Paragraph 41 of the NPPF encourages developers and local planning authorities to engage in pre-application discussions. Local planning authorities should encourage applicants to engage with the local community before submitted their applications.
- 3.5. Richmond upon Thames SCI states that the developer should have regard to any comments or responses generated by the consultation undertaken when deciding whether to make any changes to their proposals before submitting their planning applications.
- 3.6. In light of the above legislative and policy context, the applicant and project team have undertaken a collaborative pre-application programme, engaging both the Local Authority and the local community to positively develop the scheme proposals.

Pre-application feedback

- 3.7. In accordance with the Council's pre-application guidance, the applicant has engaged in productive and extensive pre-application discussions with officers regarding the proposed development.
- 3.8. The proposal has undergone two separate pre-application meetings, the first in January 2017 and the second November 2017. Written pre-application advice was received from the Council on 12 February. A full copy of this is provided at **Appendix 1**.
- 3.9. Further clarification regarding the approach to the apportionment of waste was agreed subsequent to the written pre-application advice in an email from Wendy Wong Chang on 18 April 2018. This stated:
- "...following the London Plan, policy 5.19, 12,000 tonnes of another hazardous waste stream, is fine."*
- 3.10. Further detail on the approach to the apportionment of waste is detailed in the report authored by Waterman (Waste planning policy considerations).

Public consultation

- 3.11. The consultation process for the redevelopment proposals was designed to allow the local community to view the development scheme and share their feedback with the design team.
- 3.12. The project team identified a suitable engagement strategy commensurate to the scale of the proposed development and its likely impacts on the surrounding area and community. Specifically, the consultation has included:
- A leaflet drop on 29 May to the local community (residents and businesses) comprised of 146 households advising them of an upcoming public exhibition and contact details to acquire further information;
 - An electronic copy of the consultation flyer was sent to the three Ward Councillors of Twickenham Riverside and to the three Ward Councillors of St Margarets & North Twickenham; and
 - A drop-in exhibition was held on 12 June within the nearby ETNA Community Centre.
- 3.13. The community engagement programme culminated in a public exhibition to allow members of the local community to drop in over the course of an evening to view the proposed plans and speak to the project team.
- 3.14. The exhibition was advertised through leaflets (**Appendix 2**) which were distributed to properties within the immediate proximity of the site (**Appendix 3**). Given the nature of the site, it was deemed appropriate that the leaflet drop was restricted to the streets immediately surrounding the site.
- 3.15. The drop-in exhibition was held at Turner (Green Room) in the ETNA Community Centre, 13 Rosslyn Road, St. Margarets, TW1 2AR, on 12 June from 3:30pm to 7pm. Exhibition boards (**Appendix 4**) were displayed showing the contextual analysis and studies which formed the basis of the design, and the design itself. The architects, planning consultant, transport consultant and developer were on hand to answer questions.
- 3.16. There was a total of 30 attendees at the drop-in event. Five emails and three phone calls were received in the lead up to the public exhibition, seeking to clarify that the existing waste use would be going as part of the proposals. Detail was also provided to the Twickenham Park Residents Association.

Consultation responses

- 3.17. The consultation process aimed to give all local residents, community representatives and other key stakeholders the opportunity to view and comment on the proposals.
- 3.18. A feedback form was made available to attendees at the drop-in event. A total of 18 forms were completed, all of which were completed by local residents. All of the responses received have been reviewed and where appropriate, the feedback has been incorporated into our final scheme. The responses received can be summarised as follows:
- 72% of respondents support the proposal to cease the existing waste use, with the remaining 28% of respondents expressing no opinion on this matter;
 - 50% of respondents expressed either 'support' or 'strong support' for the provision of new homes and commercial/business space in this location;
 - A majority of respondents suggested that the design of the proposed homes could be improved while the large majority of respondents were satisfied that the BTMs are proposed to be retained and refurbished as part of the proposals; and

- A number of attendees at the public exhibition raised concerns about the parking strategy proposed for the site, citing parking issues in the local area. A number of residents noted that significantly more parking should be proposed as part of the development. The existing parking arrangements for Twickenham Studios was also questioned with residents noting that residents are negatively impacted by the Twickenham Studios parking in the local area.

3.19. As a result of this feedback, and the two pre-application meetings with Council officers, the proposed scheme has been amended in the following ways:

- The design has been revised to include additional car parking and one additional residential unit, making best use of the site.
- Considered the proposed landscaping and the protection of the existing trees around the site. Ecological enhancement, including provision of bird/bat boxes, native fruiting, flowering and climbing shrubs are to be provided.
- Parking for the site has been maximised, providing 21 spaces for 24 residential units and 2 spaces for the commercial units. The applicant has also advised residents that the scheme will be subject to a prohibition on parking permits, meaning that new residents either purchasing or renting a unit in this location, will be unable to park in the surrounding streets during scheduled hours.
- Caneparo Associates, on behalf of the applicant, have also engaged with ZipCar, to investigate the ability of the proposals to support an additional car in this area. These discussions are on-going at the time of submission of the planning application.
- Individual meetings have been offered to Twickenham Studios to discuss the proposals, particularly the parking strategy and approach to noise and vibration. Discussions with Twickenham Studios are on-going at the time of submission of the planning application.
- A dedicated consultation website has been set up in order to allow local residents to review the consultation boards and receive updates as the scheme progresses. All residents who were invited to the public exhibition were notified of the website via a leaflet drop following the submission of this application. The website is: www.arlingtonworks.co.uk

Summary

- 3.20. The details set out in this section demonstrate that a comprehensive engagement process has been undertaken by the Applicant, allowing the local residents to influence the submitted proposals. Comments received from both Council officers and local residents have directly influenced the revisions that have been made to the scheme.
- 3.21. Overall, the engagement exercise has demonstrated that there is broad support for the redevelopment of the oil recycling facilities for a mixed-use development that is sensitive to the surrounding area.
- 3.22. The applicant will continue to keep neighbours and local stakeholders informed through updating the dedicated consultation website. This engagement will continue throughout the determination of this application and beyond to keep them informed of progress.

4. Proposed development

- 4.1. This application seeks consent for a mixed use development at Arlington Works, Twickenham. Permission is sought for the redevelopment of the site to provide 610 sqm of commercial space (B Class) and 24 residential units comprising of 5 x 1 beds; 12 x 2 beds and 7 x 3 beds.
- 4.2. The proposed site layout is included below:



Commercial space

- 4.3. The two Victorian Cottages which are Buildings of Townscape Merit (BTM) will be retained and sensitively refurbished as part of the redevelopment of the site to provide 610 sqm of self-contained commercial space. As part of the refurbishment, the northern BTM will be extended to create an additional commercial unit.
- 4.4. The commercial space has been divided into five duplex units however this arrangement is flexible and the space can be divided into a smaller number of larger units or a greater number of smaller units depending on demand.

Parking

- 4.5. Two parking spaces are proposed for the commercial units, adjacent to the western BTM.

Residential

- 4.6. The residential units are proposed within two separate buildings. The main block is located in the northern corner of the site and comprises 20 residential units. The smaller block, located adjacent to the eastern BTM, comprises 4 units and is 3 storeys.

Parking

- 4.7. A total of 21 parking spaces are proposed for the residential units, including three disabled

spaces. Further detail on parking is set out in the Transport Assessment, prepared by Caneparo Associates.

- 4.8. Cycle parking, in line with London Plan (2016) standards for both the commercial units (8 spaces) and residential units (43 spaces). The provision of adequate cycle parking is integral in encouraging sustainable travel behaviour.

Amenity space

- 4.9. Each residential unit will have access to private amenity space in addition to 360sqm of landscaped communal amenity space.

Refuse and recycling

- 4.10. Both the residential and commercial refuse and recycling will be stored in separate designated storage areas. Further detail on refuse is set out in the Transport Assessment, prepared by Caneparo Associates.

5. Development Plan

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2. The proposals are designed to accord with all relevant national, regional and local planning policy and guidance. Broadly speaking, policy and guidance at the national and regional levels highlight a pressing need for more housing and promotes the efficient use of urban land at sustainable locations to meet this need.
- 5.3. The relevant Development Plan for the site comprises:
- The National Planning Policy Framework (NPPF) (2018);
 - London Plan (March 2016);
 - London Borough of Richmond upon Thames Local Plan (2018); and
 - The West London Waste Plan (2015).
- 5.4. Key paragraphs of the NPPF and policies within the remaining Development Plan documents are listed below.

NPPF (2018)

- 5.5. The revised NPPF was pushed in July 2018 and at the heart of the Framework is a presumption in favour of sustainable development.
- 5.6. Paragraph 59 makes reference to the Government's objective of significantly boosting the supply of homes.
- 5.7. Paragraph 118 states that decisions should support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 5.8. Paragraph 118 further notes that decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.
- 5.9. Paragraph 121 states that Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. This includes the use of employment land for homes in areas of high housing demand.

London Plan (2016)

- Policy 3.3 – Increasing Housing Supply
- Policy 3.4 – Optimising Housing Potential
- Policy 3.5 – Quality and Design of Housing Developments
- Policy 3.8 – Housing Choice
- Policy 4.3 – Mixed Use Development and Offices
- Policy 5.3 – Sustainable Design and Construction
- Policy 5.17 – Waste Capacity
- Policy 5.21 – Contaminated Land
- Policy 6.9 – Cycling
- Policy 6.13 – Parking

- Policy 7.3 – Designing Out Crime
- Policy 7.4 – Local Character
- Policy 7.6 – Architecture.

Richmond Local Plan (2018)

- Policy LP1 – Local Character and Design Quality
- Policy LP2 – Building Heights
- Policy LP8 – Amenity and Living Conditions
- Policy LP10 – Local Environmental impacts, Pollution and Land Contamination
- Policy LP16 – Trees, Woodlands and Landscape
- Policy LP17 – Green Roofs and Walls
- Policy LP20 – Climate Change Adaption
- Policy LP21 – Sustainable Drainage
- Policy LP22 – Sustainable Design and Construction
- Policy LP23 – Water Resources and Infrastructure
- Policy LP24 – Waste Management
- Policy LP31 – Public Open Space, Play Space, Sport and Recreation
- Policy LP34 – New Housing
- Policy LP35 – Housing Mix and Standards
- Policy LP36 – Affordable Housing
- Policy LP40 – Employment and Local Economy
- Policy LP41 – Offices
- Policy LP42 – Industrial Land and Business Parks
- Policy LP44 – Sustainable Travel Choices
- Policy LP45 – Parking Standards and Servicing.

West London Waste Plan (2015)

- Policy WLWP 2 – Safeguarding and Protection of Existing and Allocated Waste Sites.

Other Supplementary Planning Documents

5.10. There are a number of relevant non-statutory documents that are also relevant to the determination of this application. These are:

- Affordable Housing SPD (2017)
- Car Club Strategy (2006)
- Design Quality (2006)
- Planning Obligations (2014)
- Refuse and Recycling Storage Requirements (2015)
- Sustainable Construction Checklist (2016).

Emerging Policy

5.11. The Draft London Plan (2017) has also been considered in the context of the proposed development. The following draft policies are of some relevance:

- Policy D3 – Inclusive Design
- Policy D4 – Housing Quality and Standards
- Policy D5 – Accessible Housing
- Policy D6 – Optimising Housing Density
- Policy H1 – Increasing Housing Supply
- Policy H2 – Small Sites
- Policy H5 – Delivering Affordable Housing.

6. Planning Assessment

6.1. This section identifies the key planning considerations relating to the scheme and assesses the proposed development in the context of relevant national and local planning policy and other material considerations.

6.2. The key planning considerations that relate to this development are:

- Principle of development
 - Replacement employment floorspace
 - Loss of waste management site
 - Residential
- Housing mix
- Affordable housing
- Design
- Residential amenity
- Transport and parking
- Refuse and recycling
- Sustainability and energy
- Flooding
- Ecology and Trees
- Contamination

Principle of Development

6.3. The proposed development comprises of a mixed use scheme through the combination of both (replacement) employment and residential uses.

6.4. The key principle at the heart of the NPPF is the presumption in favour of sustainable development (paragraph 10). Paragraph 117 goes on to state that the planning system should encourage the effective use of land by re-using land previously developed (ie brownfield land) and the planning system should proactively drive and support sustainable development for new homes and other uses by promoting new development to encourage the re-use of land in urban areas and meet housing need as a priority.

6.5. St Margaret's is a Local Centre and is identified within Policy LP34 as an area appropriate for increased residential development and Policy LP25 notes that Local Centres provide appropriate employment opportunities.

6.6. The effective, best use of sites, particularly in areas in the proximity to centres, is clearly supported by the Development Plan, the London Plan and within the NPPF.

6.7. Feedback was received during the consultation process that local residents would like to see the site redeveloped. The proposed re-development of this site, with much needed new housing, is therefore supported by the NPPF, The London Plan and Richmond planning policy.

Replacement Employment Floorspace

6.8. It has been established that the current lawful use of the site is a combination of B1 floorspace and this is provided within the existing BTM's and metal clad work sheds and the waste facility is Sui Generis.

6.9. This existing employment use has directly influenced the mixed-use nature of the proposed

scheme and although not a designed employment site, it is proposed to re-provided a significant percentage of the overall scheme as B1 space.

- 6.10. There is support for the redevelopment of this site at all levels of policy. Specifically, paragraph 118 of the NPPF (2018) states that planning decisions should:

“Promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.”

- 6.11. Paragraph 121 of the NPPF also states that Council's should take a positive approach to developing employment land for homes in areas of housing demand.
- 6.12. Policies 4.2 and 4.4 of the London Plan also support mixed use developments that incorporate B1 uses, particularly in sustainable locations with good access to public transport. Policy 4.4 notes that employment floorspace should be flexible and able to meet the needs of different types of uses.
- 6.13. In terms of local policy, Policy LP 40 states that land in employment use should be retained in employment use for business, industrial or storage purposes and encourages the provision of small units, affordable units and flexible workspace. Policy LP41, which relates to offices, notes that there is a presumption against the loss of office floorspace in all parts of the borough. The policy notes a loss of office space will only be permitted with robust evidence and then a sequential approach. This sequential approach is firstly the redevelopment for office or alternative employment uses and then mixed use including residential.
- 6.14. In terms of light industrial, storage and warehouses, Policy LP 42 notes that a loss of industrial space will only be permitted where robust and compelling evidence is provided to demonstrate that there is no longer demand for an industrial base in this location and then a sequential approach to the redevelopment is undertaken. This sequential approach is firstly the redevelopment for office or alternative employment uses and then mixed use including other employment generating uses.
- 6.15. As noted, the site currently comprises of the existing BTM's which have a GEA of 505sqm and the metal clad sheds which have a GEA of 405sqm. However, this current employment floorspace is in poor condition and is in a state of disrepair.
- 6.16. The metal work sheds are rusted and are bent out of shape and the windows are rotten, as shown in the below image. In regards to the BTM's these currently suffer from damp as there is no heating, subsidence, and rotting timber sash windows. The slate tiles on the BTM have also been covered in mesh to keep them in place as a temporary measure, however, this has now been in place for over 20 years.



- 6.17. The proposal seeks to refurbish and extend the existing BTM's to provide five good quality commercial units which will deliver a total of 714.5sqm (GEA) of B1 employment space (610sqm GIA).
- 6.18. A marketing feasibility report has been prepared by Featherstone Leigh Commercial and the report states that the new proposed floorspace in the BTM will easily absorb the minimal loss that will occur within the metal sheds.
- 6.19. The marketing report notes that over the past two to three years there have been a significant number of enquires to buy small office units but this demand has not been met. Importantly, the refurbished BTM's will provide good quality, sustainable and usable space that meets the high demand in the area and will be suitable for small to medium enterprises and start-ups.
- 6.20. The units have been designed to address this demand for smaller units and the marketing report states that the proposed units are "ideal for the current levels of demand". The report concludes that the proposed commercial space will be very well received by tenants and purchases. The internal configuration of the units has been designed to allow further subdivision or let as smaller units subject to the marketing response and demand.
- 6.21. Overall, the planning policy context establishes the need to retain employment on the site and this proposal complies with that requirement and provides high quality employment space which is a significant improvement compared to existing. It will also enable more people to be employed on the site.

Waste Management Site

- 6.22. London Plan Policy 5.17 states:
- "If, for any reason, an existing waste management site is lost to nonwaste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved."*
- 6.23. Policy SI9 of the draft New London Plan (December 2017) also states that the proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last three years should be used.
- 6.24. The Council note in their summary of responses received to their pre-publication Local Plan that Arlington Works is a Safeguarded waste site, to which policies in the West London Waste Plan (WLWP) apply. This is also reflected in Local Policy LP24 which states that proposals affecting existing waste management sites will be assessed against the policies of the West London Waste Plan (WLWP) (2015).
- 6.25. Policy WLWP 2 of the WLWP states:
- "Development for non-waste uses will only be considered on land in existing waste management use, or land allocated in Table 5-2 if compensatory and equal provision of capacity for waste, in scale and quality, is made elsewhere within the West London Boroughs"*
- 6.26. A waste report has been prepared by Waterman Infrastructure & Environment Limited. The report identifies 83% of the material received at Arlington Works comes from sources outside of London. It should also be noted that Arlington Works was ranked poorly (286 out of 309 sites) within the WLWP evidence base document 'Site Selection and Assessment Process – Summary Report' prepared by BPP Consulting (July 2014).
- 6.27. The report notes that from the Quarterly Waste Return Summary's, the application sites

three year rolling average (2013-2016) is 9,512 tonnes of material. In accordance with Policy WLWP 2, table 6 of the report identifies that there is over 20,000 tonnes of unexploited hazardous waste capacity (three year rolling average) at two sites within the WLWP area. Therefore there is clear capacity for waste in scale and quality at other sites within the WLP waste area to compensate for any loss. The proposal thus complies with Policy WLWP 2. Further detail is contained within the Waterman Infrastructure & Environment waste report which accompanies this application.

Residential

- 6.28. The need for more housing across London is well understood. Local, regional and national planning policy promotes the effective use of previously developed land to help deliver much needed new homes.
- 6.29. Policy 3.3 of the London Plan identifies the pressing need for more homes in London and sets an annual target for housing supply of at least 315 new homes (per year) for Richmond upon Thames between 2015 and 2025. This figure is reflected in Policy LP34 of Richmond's Local Plan which states that the Council will deliver at least 315 homes per year up to 2025. This equates to a total of 3,150 homes between 2015 and 2025, of which, the council state that 1,000 - 1,050 units should be delivered in five areas within Twickenham, including St Margarets.
- 6.30. However, it should be noted that The Greater London Authority (GLA) published a new London Plan for consultation in December 2017. The Draft London Plan (DLP) identifies new housing targets for all London Boroughs and a range of new policies designed to deliver an increased level of housing across Greater London through making more efficient use of well-located brownfield sites.
- 6.31. The DLP proposes a significant increase in Richmond's minimum housing target from 315 dpa to 811 dpa. This significant increase will require Richmond to ensure delivery of suitable residential developments on brownfield sites in sustainable locations.
- 6.32. Policy H2 of the DLP proposes a minimum housing target for London Boroughs to be delivered on small sites defined as being sites capable of delivering up to 25 homes. For schemes within this range, Policy H2 introduces a presumption in favour of infill developments on vacant or underused sites such as this. The DLP notes that Richmond is expected to deliver 634 dpa on small-sites which is more than double its current overall London Plan target. This emphasises the need for the Council to positively determine these types of applications.
- 6.33. Policy 3.4 of the London Plan confirms that taking into account local context character and design principles, development should optimise housing output. This application enhances the character of the area and also optimises the level of housing in this location.
- 6.34. Policy LP 34 of the Local Plan states that the council will take full advantage of opportunities to deliver new housing and exceed its housing target where possible. This scheme provides a rare opportunity to provide additional housing within an established residential area and one that will positively contribute to the character of the surrounding area.

Affordable housing

- 6.35. Policy LP 36 states that the Council will expect 50% of new housing units across the Borough to be affordable and this 50% will comprise of 40% affordable housing for rent and 10% for affordable intermediate housing. The Policy notes that Council will seek the maximum reasonable amount of affordable housing on individual private residential and mixed-use schemes having regards to economic viability, site costs, the availability of public subsidy and the overall mix of uses and other planning benefits.
- 6.36. This application is supported by a Financial Viability Appraisal Report, prepared by

Grimshaw Consulting Limited. This document is confidential as it contains commercially sensitive information and should not be placed on the public record.

- 6.37. The Viability Appraisal demonstrates that the proposed development can viably support the delivery of four on-site affordable units in a shared ownership tenure. The four units would be two 2-bed units and two 3-bed units within the small block.
- 6.38. This is the maximum reasonable amount of affordable housing the development can provide in line with the NPPF, Policy LP 36 and Policy 3.12 of the London Plan and Homes for Londoners Affordable Housing and Viability SPG (August 2017).

Mix and quality of proposed living accommodation

Housing Mix

- 6.39. Policy LP 35 seeks to provide family sized accommodation expect within five main centres and Areas of Mixed Use however the policy also notes that the housing mix should be appropriate to the site-specifics of the location. The subtext states that an appropriate mix should be considered on a site by site basis having regard to its location, the existing stock in the locality and the character of an area and take account of existing infrastructure capacity such as schools and transport.
- 6.40. The proposed development will provide 29% three bedroom units (seven units in total). This is considered to be an appropriate housing mix for the site in the context of emerging London Plan policies, the mix of the surrounding environment and the viability of the development.
- 6.41. With regards emerging London Plan policies, the small sites policy and targets set out in the DLP require flexibility in the approach to delivering housing if Richmond is going to get anywhere near its envisaged targets. The delivery of housing on sustainably located brownfield sites such as this would be constrained if this mix policy were applied rigidly.
- 6.42. The majority of the residential dwellings surrounding the site are large family homes with private gardens. The proposed mix (with an emphasis on two-bedroom units) will, therefore, provide a greater overall mix of housing sizes within the area.
- 6.43. Finally, this application is accompanied by a viability report which demonstrates that the proposed development cannot viably deliver the full amount of affordable housing to meet the Council's targets. A larger provision of three-bedroom dwellings would reduce the overall housing output for the site and, therefore, the overall development value. This will have a direct impact on viability which would undermine the deliverability of the development proposals.
- 6.44. Overall, the proposed development strikes an appropriate balance in delivering three-bedroom and larger two-bedroom units to deliver a true housing mix within the local area. There is, therefore, a good basis for the council to support the proposed residential mix in accordance with emerging policy LP 35.

Housing quality

- 6.45. The London Plan and the accompanying London Housing SPG (March 2016) set out the most up to date internal space standards for new residential accommodation. These standards are adopted from the Nationally Described Space Standard.
- 6.46. The proposed units have been designed to meet and exceed these standards. The table below identifies the range of unit sizes in relation to the national standards adopted by the London Plan.

	London Plan / Housing SPD Standard	Proposed Scheme Range
1 bed / 2 person (1 storey)	50sqm	51sqm
2 bed / 3 person (1 storey)	61sqm	62 – 74sqm
2 bed / 4 person (1 storey)	70sqm	76sqm
3 bed / 4 person (1 storey)	74sqm	76 – 101sqm

- 6.47. As well as minimum unit sizes, the Mayor's Housing SPG sets out a number of internal design standards which should be met in order to deliver high quality development. The proposed accommodation will comply with these standards with regards internal circulation, floor to ceiling heights, dual-aspect units and accessibility.
- 6.48. The proposed development will deliver high quality residential accommodation to accord with London Plan policy 3.5, Policy LP 35 and the Mayor's Housing SPG.

Private amenity space

- 6.49. The Housing SPG sets out that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant.
- 6.50. The proposed development offers private amenity space of at least 5 sqm per unit for the majority of units in the form of balconies at upper floor levels and patio gardens are ground floor level. Each balcony has a minimum width and depth of 1.5 metres, in accordance with policy.

Communal amenity space and child playspace

- 6.51. Communal amenity space totalling 360sqm is to be provided as part of the development proposals. This landscaped amenity space is predominately located to the southern end of the small block.
- 6.52. The communal amenity area will meet the criteria of Standard 4 of the Housing SPG as it will be well overlooked by the residential units within the development, accessible, benefit from ample amounts of direct sunlight and will be subject to a suitable management arrangement.
- 6.53. Policy 3.6 of the London Plan and policy LP 31 require proposals to include play and informal recreation areas based on the expected child population generated by the scheme and an assessment of future needs. Using the GLA's SPG play space calculation spreadsheet for a 24-unit development, a total of 57.5sqm of playspace is required.
- 6.54. Due to the site constraints, it is not practical of feasible to deliver the playspace on site. However, the area is well served with parks and gardens which contain playspace within a 15 minute walk of the site, including Moormead and Bandy Recreation, Marble Hill Park; Cambridge Gardens and playpark. Richmond Green is also within close proximity to the site. In accordance with policy LP 31, the application is willing to consider contributions to the upkeep and maintenance of these parks in lieu of any on site amenity space.

Residential amenity

- 6.55. A key principle of the NPPF seeks to secure a good standard of amenity for all existing and future occupants of land and buildings. This is reflected in Local Policy LP 8 and LP 35 which require proposals to protect the amenities of occupants of new, existing, adjoining and

neighbouring properties.

- 6.56. Within the apartment blocks themselves, windows, walls and balconies have been arranged to minimise overlooking from one unit to another whilst also maximising dual aspect units. Similarly, the layout of the proposed development has been designed in such a way to ensure the maximum separation distances are achieved on the site between the two blocks while not compromising the utilisation of the site.
- 6.57. These design measures ensure that the development will not result in overlooking to any adjoining residential property or garden area and therefore the proposal accords with Policy LP 8 and LP 35.

Design

- 6.58. The NPPF attaches great importance to the design of the built environment as a key part of sustainable development. Planning policies and decisions should not attempt to impose architectural styles or tastes, but should seek to promote or reinforce local distinctiveness. This approach is reinforced in London Plan policies 7.4 and 7.6 and Local Plan Policy LP 1.
- 6.59. The final design of the submitted scheme has evolved from the pre-application submission. The design team has taken on board comments received from officers during the extensive pre-application discussions and during the public exhibition. Please note that the design matters in relation to the BTM's is addressed in Section 7 – Heritage Assessment.

Height, scale and massing

- 6.60. The proposed massing of the development comprises one four storey larger block and one three storey smaller block. To reduce the massing of the development the fourth storey of the larger block and third storey of the smaller block will be stepped back.
- 6.61. The site is located in a back-land location and, therefore, its development will not have an impact on an established street-scene. The development will, therefore, have a minimal impact on the visual amenities of the surrounding area.

Materiality and appearance

- 6.62. The architectural detailing with the proposed development is of high quality and will positively contribute to the character of the surrounding area.
- 6.63. The larger and smaller apartment buildings will be arranged as described above and will be finished in yellow London stock brick to match the BTM terraces. To relate to the sites industrial history, zinc metal cladding will be used on the top floors of the two blocks.
- 6.64. Overall, the proposed development will positively contribute to the character of the area and significantly enhance the appearance of the existing site. The development will, therefore, accord Policy LP1.

Transport and parking

- 6.65. A Transport Assessment, prepared by Caneparo has been submitted in support of the application.

Trip generation

- 6.66. A trip generation assessment was undertaken to determine the potential impact of the development proposals on the local transport network. The results showed that the proposal will result in a net benefit for the local highway network given the existing uses at the development site.

- 6.67. The proposal is therefore in accordance with national policy, Policy 6.9 and 6.13 of the London Plan and Policy LP44 and Policy LP45 of the Local Plan.

Car parking

- 6.68. The London Plan sets out maximum car parking standards for development in London and these standards are adopted in Richmond upon Thames.
- 6.69. The proposal will provide 21 on-site car parking spaces for the proposed 24 residential dwellings and two spaces for the commercial units. The residential provision has been increased following pre-application discussions with officers and discussions with the local community. This provision provides an appropriate balance between enabling adequate parking provision whilst not undermining the use of alternative transport modes. Each residential dwelling will also be provided with a two-year car club membership.
- 6.70. Policy 6.13 of the London plan states that disabled car parking in a residential development should comprise of 10% of the total off-street parking provision and in relation to the number of enlarged but unmarked spaces there must be 1 space per 10 dwellings. The proposal complies with policy by providing three spaces that will be suitable for disabled parking.

Cycle parking

- 6.71. On-site cycle parking will be provided in accordance with London Plan (2016) stands for both commercial floor space and the residential units.
- 6.72. A secure and covered cycle store is proposed within the envelope of the main apartment building and will provide 42 cycle spaces. A covered cycle store will be provided in the stable terrace yard to provide 8 cycle spaces for the commercial units.

Refuse collection and servicing

- 6.73. The residential refuse and recycling will be stored in designated storage areas within the envelope of the main apartment building and will comprise of 6 x 1,100l eurobins. The commercial refuse and recycling store is located in the stable terrace yard and will house 1 x 1,00l eurobin.
- 6.74. The site's refuse storage and collection strategy is in accordance with best practice guidance and the proposal is therefore in accordance with national policy, Policy 5.3, Policy 5.16 and Policy 5.17 of the London Plan, Policy LP24 of the Local Plan and the Refuse and Recycling Storage Requirements SPD.

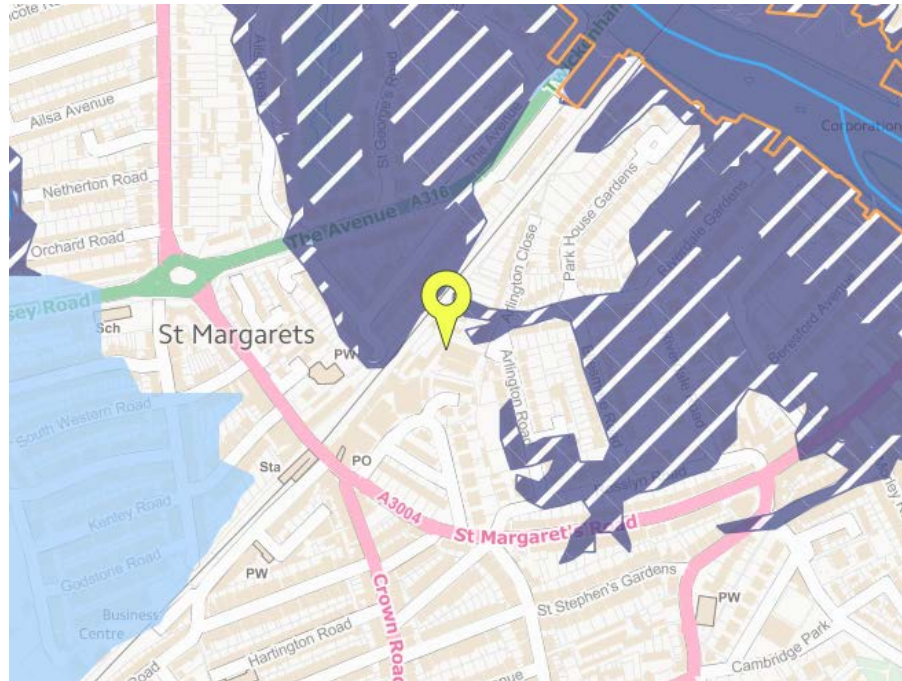
Sustainability and energy

- 6.75. Blue Sky Unlimited have prepared a Sustainability and Energy Statement (SES) which includes an energy demand assessment how selected energy efficiency, low carbon and renewable energy measures have been incorporated into the development design.
- 6.76. It is proposed to enhance the fabric insulation standards of the buildings and to install an air source heat pump into each of the seven commercial units. These systems will provide space heating and cooling if required. The proposed flats will be provided with individual gas condensing boilers. In addition, it is proposed to install a photovoltaic array totalling 19.8 kW comprising of 66 x 300W panels.
- 6.77. The residual carbon dioxide emissions are 25.494 tonnes and therefore the carbon offset payment required by the London Plan is £44,089 as set out within the SES.
- 6.78. The commercial units will achieve BREEAM "excellent". Further information on sustainability and energy can be found in the SES submitted in support of the application, including a completed Sustainable Construction Checklist.

- 6.79. The proposal is therefore in accordance with national policy, Policy 5.3 and Policy 5.17 of the London Plan and Policy LP20, LP22 and LP24 of the Local Plan.

Flooding

- 6.80. The site is located within Flood Zone 1, as shown in the map below and therefore at a low risk of flooding.



- 6.81. Flood Risk Assessment (FRA) is not usually required unless (a) the site is larger than 1ha, or (b) it could be at risk from sources of flooding other than rivers or the sea. The site is approximately 0.3ha, however, the latter is assumed, therefore a FRA, prepared by Dr P Garrad, has been prepared in support of this proposal.
- 6.82. The FRA concludes that there is no evidence of historical flood events in St Margarets and other potential sources of flooding such as storm water, roads, sewers, tides, impounded water bodies and groundwater are considered to be low. Furthermore, the raised floor levels will protect the buildings from pluvial and other sources of flooding and additional flood resistance or resilience measures are not required.
- 6.83. The FRA also includes an assessment on Sustainable Drainage System (SuDS). The SuDS options have been assessed in Chapter 4 of the FRA. The FRA concludes that the preferred SuDS measure is the provision of an oversized drainage network and storm cells to reduce the developed site runoff. Further detail of this is set out in Chapter 4 of the FRA.
- 6.84. The proposal is therefore in accordance with national policy, Policy 5.15 of the London Plan and Policy LP17, Policy LP21 and Policy LP23 of the Local Plan as well as the Council's Strategic Flood Risk Assessment.

Ecology and Trees

- 6.85. A Tree Survey was undertaken by Arbtech in May 2018 and the results have been set out in the Tree Survey report, dated June 2018. The survey concluded further assessments were required prior to submitting an application which included the preparation of an Arboricultural Impact Assessment (AIA), an Arboricultural Method Statement (AMS) and a tree protection plan.

- 6.86. The AMS sets out the strategy for protecting the trees within close proximity to the site during the construction of the development. The AMS concludes that the proposal would not adversely affect the trees and the groups of trees within and adjacent to the site.
- 6.87. The tree protection plan (drawing ref. Arbtech TPP 01 rev. A) provides detail of the protection fence located to the south of the site to protect trees that are located outside of the application site. Furthermore, the plan provides detail on the ground protection areas for G1 and G2 to ensure the roots are well protected during any demolition and construction of the proposal.
- 6.88. A separate Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment Survey has been undertaken and prepared by Arbtech. The survey concluded that there would be no impact on notable habitats and plants, invasive/non-native species, reptiles, great crested newts, other terrestrial mammals and invertebrates.
- 6.89. Additional surveys were undertaken for birds and it has been recommended to install 17 nest boxes to be located at least 3m above ground level where they will be sheltered. These recommendations will be undertaken in accordance with the survey findings. Further surveys are being undertaken for bats (from mid-May to August) to comply with national guidelines and these additional results will be provided to the Council at a later stage.
- 6.90. The proposal is therefore in accordance with national policy, the London Plan and Policy LP16 of the Local Plan.

Contamination

- 6.91. A Phase 1 Desk Study, Site Reconnaissance and Phase 2 Site investigation Report, prepared by Leap Environmental Ltd has been submitted in support of the proposal. An initial desk study and intrusive site investigation was undertaken in 2014/2015 and the Phase 2 report has undertaken further assessment of the site.
- 6.92. The surveys found that the site is covered in a mantle of made ground under concrete hardstanding which was found to be contaminated with arsenic and lead. However, this does not hamper the redevelopment of the site and the report recommends to include some provision so that the redevelopment of the application site will protect human health. These have been set out in chapter 23 of the report. The proposal is therefore in accordance with national policy, Policy 5.21 of the London Plan and Policy LP10 of the Local Plan.

Air Quality

- 6.93. An Air Quality Assessment has been prepared by WSP to accompany this planning application. The report assesses the air quality impacts during construction and operation of the proposed development.
- 6.94. During construction the report notes that there is a medium risk of dust soiling during earthworks and low risk from demolition and construction activities and from trackout. This poses a negligible to low risk in terms of human health impacts. Nevertheless, mitigation measures are proposed to ensure that the residual effects during construction on air quality will not be significant. These mitigation measures are outlined in section 6.1 of the report by WSP.
- 6.95. During operation it is expected that all but one local road will experience a decrease in traffic because of the change in use and therefore it is not predicted to result in a significant increase in traffic. The proposal will therefore not have a significant effect on air quality.
- 6.96. Overall the report concludes that the proposed development will not have a significant residual effect on local air quality and therefore accords with Policy 7.14 of the London Plan and Policy LP 10 of the Local Plan.

7. Heritage Assessment

- 7.1. The site is not situated within a Conservation Area, and none of the existing buildings are statutorily listed. Two mews buildings within the site were designated as Buildings of Townscape Merit (BTM's) in November 2013 and are considered non-designated heritage assets.
- 7.2. In terms of the surrounding area, St Margaret's Conservation Area is situated approximately 20m to the north of the site and Church of St Margaret's of Scotland is Grade II listed and is situated 50m to the west of the site. Importantly, both these designated heritage assets are separated from the site by the railway line.

Legislation and policy

- 7.3. When dealing with development that lies within or adjacent to a Conservation Area and that involves the setting of listed buildings, the Council must follow a hierarchy of legislative tests and guidance. In this instance, these are, in diminishing order of importance:
- S66 and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990;
 - National Planning Policy Framework (NPPF) (March 2018); and
 - LB Richmond upon Thames Local Plan (2018).
- 7.4. Other material considerations include the National Planning Practice Guidance (NPPG).
- 7.5. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering applications within a Conservation Area, Local Planning Authorities must pay special attention to the desirability of preserving, or enhancing the character and appearance of the area.
- 7.6. Paragraph 189 of the NPPF directs applicants to describe the significance of any heritage assets that are affected by development. The level of detail provided should be proportionate to the importance of the asset and it should also evaluate the potential impact of the scheme on the significance of that heritage asset, including its setting.
- 7.7. Planning policy and guidance sets out differing approaches to designated and non-designated heritage assets, reflecting their different levels of importance. In both cases an assessment must be made of their significance and any harmful impact proposals would have on the asset. Where harm is caused to a designated heritage asset (in this case the whole Conservation Area) then, depending on the level of harm, various criteria must be satisfied to justify such harm (paragraphs 195 and 196 of the NPPF). Where proposals have an effect on the significance of a non-designated heritage asset, including through change to its setting, then any harm caused must be taken into account in making a judgement as to the overall acceptability of the proposal (paragraph 197 of the NPPF).
- 7.8. This section assesses the impact of the proposed scheme on the two Buildings of Local Townscape Merit on the site. Any potential impact on the setting of St Margaret's Conservation Area and the Church of St Margaret's of Scotland is also assessed.

Buildings of Townscape Merit

- 7.9. Two mews buildings located within the southern area of the site are designated as BTMs. The character and heritage value of the stable buildings as a BTM come from the original fabric of its external elevations and that of the cobbled mews/yard between the terraces.
- 7.10. The scheme proposes to retain and sensitively refurbish these buildings and extend the

northern terrace at both ground and first floor levels to the western site boundary to create a new B1 unit. The extension will be made of brick to blend into the existing BTM's and the cobbled surfacing of the mews will be retained and extend so that it covers the full length of the mews to enhance the setting of these BTM's.

- 7.11. The height and configuration of the buildings proposed across the other areas of the site have been carefully considered to ensure that there is no impact on these non-designated heritage assets.
- 7.12. The two new residential buildings will predominately comprise of brick to complement the materials of the BTM's and are a significant improvement in terms of building quality and materials, when compared with the existing use and layout of the site. This has a positive impact in heritage terms.

St Margaret's Conservation Area

- 7.13. St Margaret's Conservation Area (SMCA) was designated in 1971 and the area 20m north of Arlington Works formed part of SMCA when the conservation area was extended in 2005. A Conservation Area Appraisal (CAA) has been adopted by the Council but is not dated.
- 7.14. The CAA notes that the majority of the buildings within the SMCA were built on the site of two enclosed private garden. A variety of architectural styles are represented with many two storey detached villas in a deliberate mixture of Gothic and Italianate styles.
- 7.15. It is therefore clear that the existing mixture of industrial buildings and structures at Arlington Works currently provide no contribution to the setting of the Conservation Area. The proposed development is therefore an opportunity to provide high quality buildings that will enhance this adjoining Conservation Area.
- 7.16. In this way, the proposals will make a positive contribution to the setting of the SMCA. In fact, the overall setting of the conservation area will be enhanced as a result of the proposed development.

Church of St Margaret's (Grade II)

- 7.17. The Church of St Margaret's of Scotland was Grade II listed on 5 May 1999 (List entry Number: 1387183). The building was built in 1968 and was listed due to its modern movement style comprising of forticrete concrete block walls with steel trusses supporting flat roofs.
- 7.18. The building is located 50m to the west of the site however a railway line, dense foliage and a car park separate the site from this heritage asset. Furthermore, the two BTMs within Arlington Works within closest proximity to this asset are being retained and refurbished.

Summary

- 7.19. Overall, the proposed development is acceptable on both design and heritage grounds, and the setting of St Margaret's Conservation Area will be enhanced through the removal of low quality industrial buildings.

8. Conclusion

8.1. This Planning Statement has been prepared in support of an application for full planning permission on behalf of Sharpe Refinery Service Ltd to support a planning application at Arlington Works, Arlington Road, Twickenham.

8.2. Planning permission is sought for the:

“Redevelopment of the site to provide 610sqm of commercial space (B class) within existing Buildings of Townscape Merit plus a new built unit, 24 residential units (5 x 1 bedroom, 12 x 2 bedroom and 7 x 3 bedroom) and associated car parking and landscaping.”

8.3. Our conclusion in respect of our assessment of this scheme can be summarised as follows:

- Provision of a high quality and accessible mixed-use development in a sustainable location within walking distance to St Margarets Train Station and accessible to Twickenham Town Centre;
- 24 new homes, including seven family homes are provided, contributing to the housing need in Richmond and affordable housing on-site;
- The oil recycling use on this site will cease having significant benefits in terms of residential amenity, sustainability, noise and odour;
- Higher quality and fit for purpose employment floorspace to replace the oil recycling and dilapidated commercial units on the site, allowing the local employment opportunities in this area to increase;
- The sensitive refurbishment of the BTMs is a clear heritage benefit of the scheme. The proposal will enable these two buildings to remain in viable use well into the future;
- The bespoke design ensures no overlooking as well as significant levels of light into the habitable areas of the flats;
- Through the use of high quality materials, this scheme provides a strong design. The proposed materials of yellow stock brick match the existing BTM's and the metal cladding emphasis the sites industrial history;
- Car parking and cycle parking encouraging sustainable travel behaviour is provided on site. The scheme will be permit free, ensuring that new residents will not be able to park in the surrounding streets; and
- High quality landscaping, particularly in the communal areas, will create a positive environment, integrating with nearby trees and the existing environment.

8.4. This is a substantial list of planning benefits which arise directly from the application scheme, and which will provide demonstrable improvements to the local area. The scheme is compliant with Development Plan policies and so fully justifies the grant of planning permission.

Appendix 1

Civic Centre, 44 York Street, Twickenham TW1 3BZ
tel: 020 8891 7300 text phone 020 8891 7120
fax: 020 8891 7789
website: www.richmond.gov.uk

Ms Jessica Carmichael
Senior Planner
Indigo Planning
11 Walpole Road
Wimbledon
SW19 4JS

Please contact: Ross Harvey
Centre on 0208 891 1411
email:
ross.harvey@richmond.gov.uk

Date: 12 February 2018

Dear Ms Carmichael

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

Site: Arlington Works, 23 Arlington Road, Twickenham, TW1 2BB

Proposal: Redevelopment of the site to provide replacement employment space (580sqm) and 23 residential units, with associated landscaping and car parking.

Thank you for your pre-application submission for the above site and please accept my apologies for the delay in issuing our response.

Site and surrounding

The site refers to the 'Arlington Works' and adjoins the railway approximately 80m to the north east of St Margarets Station. Twickenham Film Studios is situated to the south-west and Kelvin Court (flats) are to the east. The site is situated to the north but is not located within the St Margarets Conservation Area. The site comprises a collection of industrial buildings for an oil refinery and associated waste oil recycling, manufacturing, vehicle repair and storage. The site also accommodates two Buildings of Townscape Merit (BTM's) which are situated to the south west.

Whilst the site is not situated within a Conservation Area, it does benefit from being within the Ravensbourne Road and Surrounds Character Area under the East Twickenham Village Planning Guidance, which describes Arlington Road as follows:

The east side of Arlington Road is made up of semi-detached houses of a regular design with inset, round-headed porches and rendered elevations. They appear to have originally had pebble-dash rendered facades which in many cases have been replaced with stucco. Many of the timber casement windows have been replaced with uPVC. The front boundary walls have not survived as well as those on Ellesmere Road; most front gardens have been fully converted to parking. On the west side are blocks of flats from the first half of the twentieth century. By and large, these are fairly unremarkable but some have attractive Deco detailing. One of these blocks is built of multi-coloured brick and is of an earlier date than the others. The ground floors of the flats are below street level, at the height of a normal basement. On the west side of this junction stands an attractive Victorian house built from gault brick. This street also has wide pavements with tree lined streets, with the perception that they were originally laid out with grass verges that have been subsequently tarmacked over. The pavements here too are a haphazard mixture of materials.

Although the sites backland location would ensure that development would not appear overly visible

from Arlington Road, any formal application should demonstrate compliance with the characteristics typical of the area.

Proposal

Redevelopment of the site to provide replacement employment space (580sqm within 6 commercial/office units) and 23 residential units, with associated landscaping and car parking.

Planning History

Whilst the site is subject to an extensive planning history, the following relevant cases have been outlined below:

- 94/2139/S191 – Use For The Refining Of Waste Oil (other Than Petroleum Or Petroleum Products) (to Include The Use Of Fuel Storage Tanks In This Connection) – Granted permission 18.10.1994
- 89/1750/OUT - Redevelopment Of Site For Business Purposes Falling Within Use Class B1, to Provide 1,458 Sq. M. Of Floorspace – Unkown status
- 59/0883 - Installation of fuel storage tanks – Granted permission 22.10.1959
- 47/7909 - Erection of building to be used for storage purposes. – Granted permission 27.03.1957
- 47/4716 - The erection of factory buildings and offices – Refused permission 15.03.1954
- 47/3740 - The use of a lean-to shed as a temporary garage and a repair shop – refused permission 04.02.1953
- 47/3442 - The erection of 4 factory buildings. – 13.10.1952
- 47/1511 - Use for light industry (textile printing) – Granted permission 15.05.1950
- 47/0267 - Use for light industry – Granted permission 13.12.1948

Policies

Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise. The development plan in the London Borough of Richmond upon Thames (LBRuT) is the Core Strategy (2009) and the Development Management Plan (2011).

In line with paragraph 216 of the National Planning Policy Framework (NPPF) (2012), weight can be given to the policies in the emerging Local Plan according to:

1. the stage of preparation of the emerging plan;
2. the extent to which there are 'unresolved objections';
3. the degree of consistency of the policies with the NPPF.

LBRuT's Cabinet agreed in December 2016 that the emerging Local Plan and its policies would be adopted and used for development management purposes with immediate effect. All responses received on the Publication Local Plan during the consultation have now been published online. It was submitted on 19/05/2017 to the Secretary of State for Communities and Local Government for independent examination in public by a Planning Inspector. The hearings phase completed in October 2017, and the Inspector is now producing his report. Once the Planning Inspector has submitted his report on the Local Plan to the Council, this will be made available on the Council's website. The assumption is that Plan is considered 'sound' and consistent with the NPPF, and that the policies within the whole Plan are to be given significant weight in the determination of planning applications, and are now a material planning consideration.

A planning application for the above would therefore be considered against all relevant national, regional and local planning policies as well as any relevant guidance. Until the Local Plan is adopted (anticipated by spring 2018), both the existing Core Strategy and Development Management Plan policies, as well as the emerging Local Plan policies, will need to be considered. Set out below are those policies most relevant to this application; however, consideration is made against the development plan as a whole.

National Planning Policy Framework (NPPF) (2012)

The London Plan (2015) (as amended by the Minor Alterations to the London Plan, 2016)

Regional planning guidance

- Greater London Authority (GLA) Industrial Land Demand Study (2017)
- GLA Industrial Land Supply and Economy Study (2015)
- Mayor of London's Land for Industry and Transport SPG (2012)

Adopted Core Strategy (CS) (2009) Policies

- CP1 'Sustainable Development'
- CP2 'Reducing Carbon Emissions'
- CP3 'Climate Change – adapting to the effects'
- CP5 'Sustainable Travel'
- CP6 'Waste'
- CP7 'Maintaining and Improving the Local Environment'
- CP14 'Housing'
- CP15 'Affordable Housing'
- CP19 'Local Business'

Adopted Development Management Plan (DMP) (2011) Policies

- DM SD1, 'Sustainable Construction'
- DM SD2, 'Renewable Energy and Decentralised Energy Networks'
- DM SD10, 'Water and Sewerage Provision'
- DM OS5, 'Biodiversity and New Development'
- DM OS7 'Children's and Young People's Play Equipment'
- DM HD3, 'Buildings of Townscape Merit'
- DM HD7 'Views and Vistas'
- DM HO3, 'Backland Development'
- DM HO4, 'Housing Mix and Standards'
- DM HO6, 'Delivering Affordable Housing'
- DM EM1, 'Development for Offices, Industrial, Storage and Distribution Uses'
- DM EM2, 'Retention of Employment'
- DM TP1, 'Matching Development to Transport Capacity'
- DM TP2, 'Transport and New Development'
- DM TP6, 'Walking and the Pedestrian Environment'
- DM TP7, 'Cycling'
- DM TP8, 'Off-street Parking – retention and new provision'
- DM TP9, 'Forecourt Parking'
- DM DC1, 'Design Quality'
- DM DC2, 'Layout and Design Use of Mixed Use Schemes'
- DM DC4, 'Trees and Landscape'
- DM DC5, 'Neighbourliness, Sunlighting and Daylighting'
- DM DC6 'Balconies and Upper Floor Terraces'
- DM DC9 'Planning Application Checklist'

Local Plan (LP) (Publication Version 2017) Policies

- LP1 'Local Character and Design Quality'
- LP4 'Non-Designated Heritage Assets'
- LP5 'Views and Vistas'
- LP8 'Amenity and Living Conditions'
- LP10 'Local Environmental Impacts, Pollution and Land Contamination'
- LP15 'Biodiversity'
- LP16 'Trees, Woodlands and Landscape'
- LP20 'Climate Change Adaptation'
- LP24 'Waste Management'

- LP34 'New Housing'
- LP35 'Housing Mix and Standards'
- LP36 'Affordable Housing'
- LP37 'Housing Needs of Different Groups'
- LP39 'Infill, Backland and Backgarden Development'
- LP40 'Employment and Local Economy'
- LP41 'Offices'
- LP42 'Industrial Land and Business Parks'
- LP44 'Sustainable Travel Choices'
- LP45 'Parking Standards and Servicing'

Supplementary Planning Guidance (SPG) / Documents (SPDs)

- Design Quality SPD (2006)
- Residential Development Standards SPD (2010)
- Small and Medium Housing Sites SPD (2006)
- Sustainable Construction Checklist SPD (2011)
- Affordable Housing SPD (2014)
- Front Garden and Other Off-Street Parking Standards SPD (2006)
- Planning Obligations SPD (2014)
- East Twickenham Village Planning Guidance SPD

West London Waste Plan (WLWP) (2015)

All London Plan, Core Strategy, Development Management Plan, Local Plan policies and Supplementary Planning Guidance and Documents referred to in this letter are available to view on the Council's website (www.richmond.gov.uk).

Following on from your meeting with Wendy Wong Chang, the Council has had an opportunity to look at the plans in some detail in the context of the site.

The main issues for consideration would be:

- Principle of redevelopment and re-use of site
- Design, Massing and Layout
- Sustainability and renewable energy targets
- Parking and transport considerations
- Impact on existing residential amenity

Principle of Redevelopment

Loss of Employment and loss of Waste Management Site

Core Strategy Policy CP19 seeks to retain land in employment use in order to support a diverse and strong local economy in Richmond.

The criteria set out in the emerging Local Plan Policy LP42 and DMP Policy DM EM 2 should be addressed when considering the loss of employment / industrial space. The use of industrial space (outside of the locally important industrial land and business parks) will only be permitted where:

1. Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an industrial based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing use or an alternative industrial use completed over a minimum period of two continuous years in accordance with the approach set out in Appendix 5; and then
2. A sequential approach to redevelopment or change of use is applied as follows:
 - a. Redevelopment for office or alternative employment uses.
 - b. Mixed use including other employment generating or community uses.

Each borough has been allocated an amount of London's waste that it is required to positively plan for and manage. This includes ensuring that sufficient capacity is identified to meet the apportioned

targets in the London Plan (2011).

The prepared jointly by London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond Upon Thames, and Old Oak Common and Royal Development Park Corporation (OPDC) West London Waste Plan (WLWP) forms part of the Local Plan:

The WLWP identifies and safeguards sites for waste management facilities in the area to deal with West London's waste over the period up to 2031. These were selected through a rigorous process lasting a number of years where the public and industry were invited to express their opinions and suggest suitable sites. Site no. 335 is the existing 0.23ha Arlington Works, in Richmond upon Thames. It is acknowledged that the applicants submitted Waste Plan refers to the portion of land being lawfully permitted to manage waste as approximately 0.05ha. The report includes a copy of the land use certificate granted permission under 94/2139/S191 which indicates that only the land portion of the land is subject to permission for change of use to the waste oil refinery, being the northern part of the site. Whilst it is acknowledged that the use is limited to only a portion of the site, the single point of access as a right of way to the facility would be considered as ancillary to the function of the waste oil refinery. Further, it is evident that the existing BTM's are currently used as part of the waste oil refinery. It would therefore be considered that these buildings are used as ancillary to the function of the waste oil refinery. On this basis, whilst there is some merit to the lawful use of the site being limited to a portion less than 0.023 hectares, it would need to be demonstrated that the use of the remainder of the site is not currently and has not previously been associated with the waste use for a period of 10 years.

Policy WLWP 2 - Safeguarding and Protection of Existing and Allocated Waste Sites states that land accommodating existing waste management uses in West London will be protected for continued use for waste management.

Existing sites which have been allocated as having the potential for capacity expansion by redevelopment (Table 5-1) and new sites with potential for development for waste management facilities (Table 5-2) are also to be safeguarded.

To ensure no loss in existing capacity, re-development of any existing waste management sites must ensure that the quantity of waste to be managed is equal to or greater than the quantity of waste for which the site is currently permitted to manage, or that the management of the waste is being moved up the waste hierarchy.

Development for non-waste uses will only be considered on land in existing waste management use, (or land allocated in Table 5-2) if compensatory and equal provision of capacity for waste, in scale and quality, is made elsewhere within the West London Boroughs.

In addition, land in employment uses should be retained in employment use for business, industrial or storage purposes, as outlined under Policy LP40 of the emerging Local Plan. The borough has a very limited supply of industrial land and is categorised as "restrictive transfer" by the Mayor of London. This means the Council should take a restrictive approach to the transfer of industrial land to other uses. The criteria set out in LP42 must be met even if WLWP policy 2 could be satisfied.

It is noted that whilst the adjacent Twickenham Film Studios is identified within the emerging Local Plan as a Key Employment Site, Arlington Works is not.

New Residential Use

The proposed residential use as part of a mixed use development would only be considered acceptable provided it does not result in any loss of existing employment floorspace unless the requirements of the aforementioned policies have been addressed and that comprehensive and equal provision for waste handling is made elsewhere in London. The proposal needs to ensure it does not have any negative impact on the employment use nor the successful operation of that use and any neighbouring businesses in terms of access, servicing or any conflict such as hours of operation, noise, to address the requirements of Policy DMDC2. The scheme submitted for Pre-App suggests separate access for the commercial and residential elements which could possibly address

the above. However, the main housing policy issues would then be:

- the need to provide on-site affordable housing;
- the need to address policy requirement for a mix of units, internal and external space standards and inclusive access;
- assessment of the acceptability of backland housing on this site with regards to scale and massing, impact on the character of the area, and amenity impact.

Affordable Housing

Affordable Housing

Affordable housing should be provided on-site and reflect the priorities set out in Policy CP15 - which seeks of at least 50% to be affordable, of which 80% should be for rent and 20% intermediate. Where there is a loss of employment floorspace, in accordance with Policies CP19, DMEM2 and LP36, any residential use replacing employment floorspace should be in the form of affordable housing. Due to the lower existing use value of employment use it is recognised that such sites can deliver more affordable housing to compensate for any loss of employment (see paragraph 2.4.2 of the Affordable Housing SPD).

The provision of affordable housing should be discussed with the Council's Housing Development Manager and local Registered Providers, who have a strong understanding of the local housing market, and evidence of these discussions are required to be submitted with any future planning application (as set out in the Local Validation Checklist) so that local housing priorities in terms of tenure, size of units and affordability can be best met.

The Council requires a Registered Provider is engaged at an early stage in order that specifications meet their requirements, and so that their offer for affordable housing takes account of available funding opportunities to inform viability. The Council's Strategic Tenancy Policy includes guidance on affordable rents, and the Intermediate Housing Policy Statement sets out guidance on intermediate housing, both are at www.richmond.gov.uk/housing_services_summary_of_strategies.htm

Housing standards

Housing mix

Policy DM HO4 and LP35(A) state that development should generally provide family-sized housing outside of town centres and Areas of Mixed Use, and that the housing mix should be appropriate to the location. The supporting documents submitted as part of the application states that proposal will provide a number of family sized dwellings whilst noting that there is limited space on the site for family recreation/playspaces. The proposed mix is stated as 6x one bed apartments (26%), 11x two bed apartments (48%) and 6x three bed apartments (26%). The occupancy and unit sizes have been included within the submitted area schedule. It would appear from the area schedule that several 3 bedroom 4 person units could be utilised as family sized dwellings, however detailed floor plans have not been submitted with the application. The areas stated can therefore only be considered as indicative. Notwithstanding this, the mix appears to provide a range of unit sizes; however, this would need to be assessed alongside tenure as part of a proposed scheme, and whether the proposed mix is appropriate to the location.

Internal space standards

The standards set out in Policy DM HO4, the Residential Development Standards SPD and Policy LP35(B) should be addressed. Since 1 October 2015, the Council is applying the nationally described space standard when assessing new residential units. No information has been provided in order to enable an assessment of whether the units would meet these standards. An application would need to address the relevant standards by submitting detailed floor and section plans.

External space standards

The Council seeks the provision of external amenity space in accordance with Policy DM HO4, the Residential Development Standards and Policy LP35(C and D). For houses, a minimum total private amenity space of 40sqm for two-bedrooms and 70sqm for three or more bedrooms should be provided. For flats, a minimum of 5sqm of private outdoor space for a 1-2 person dwelling should be

provided and a further 1sqm per additional occupant.

The submitted drawings show private amenity space for the majority of dwellings by way of courtyards for ground floor units and protruding balconies for upper level units. Should a formal planning application be submitted, it would be strongly advised that plans include sufficient detail to demonstrate that sufficient private amenity space has been provided. Although it is acknowledged that the current scheme is indicative, the size and extent of private amenity space is not clear on the submitted drawings.

There is a lack of children's playspace, which needs to comply with London Plan and LBRuT policy requirements (DM OS7 and LP31). Where on-site provision of Public Open Space or play space is not feasible or practicable, surrounding facilities and spaces would need to be improved and made more accessible to the users and occupiers of the new development at the expense of the applicant.

Noise and Vibration

As the site is situated adjacent to a railway line, potential issues may arise in relation to noise and vibration.

As the site is situated adjacent to a railway, it would be advised that a noise risk assessment of the proposed development site should be conducted by a competent noise practitioner at the earliest opportunity, before any planning application is submitted. In addition, under Section 9 of the Draft SPD 'Noise Generating and Noise Sensitive Development', it is noted that the '*Borough will normally require a vibration assessment where railways, either surface or underground, are within 30m of a proposed development site*'.

Inclusive access

Since 1 October 2015, 90% of new housing in a development is expected to meet Building Regulation Requirement M4(2) 'accessible and acceptable dwellings' and 10% is expected to meet Building Regulation Requirement M4(3) 'wheelchair-user dwellings'. This is set out in Policy LP35(E). Both M4(2) and M4(3) require step-free access, though upper-floors served by a lift may be considered appropriate.

The submitted Design & Access Statement notes that all units within the large building will be accessible and include a passenger access lift to each level. It also notes that the communal stair will be built to an ambulant disabled standard. The statement further notes that the above requirement for 10% of dwellings to meet Building Regulation Requirement M4(3) will be achieved.

Should a future application be submitted, compliance with the above would be secured by condition of any permission granted for redevelopment of the site.

Amenity

In terms of amenity and outlook, more information is required to demonstrate that the proposed residential units would receive adequate levels of daylight, sunlight and outlook. It is noted that the proposal is for predominantly dual aspect homes with large front and rear facing windows. The Council would expect the numbers of homes which are dual-aspect to be maximised, and would request justification where dwellings do not meet this standard. Please note that this is especially the case regarding flats, as per the Council's Residential Standards SPD which states that increased ventilation and dual aspect dwellings in flats should be created wherever possible, to allow for cross ventilation. Where there are single-aspect dwellings proposed, the Council would expect to see adequate amenity space in order to mitigate the potential impacts.

Backland housing: character, design and layout

Acceptability of backland housing

Policy DM HO3 and LP39 state that all backland development must reflect the character of the surrounding area and protect the amenity of neighbours. Notwithstanding the in-principle objection to the loss of employment/industrial floorspace, in considering applications for backland developments, the following factors will be taken into account:

1. Retain plots of sufficient width for adequate separation between dwellings;

2. Retain similar spacing between new buildings to any established spacing;
3. Retain appropriate garden space for adjacent dwellings;
4. Respect the local context, in accordance with policy LP 2 Building Heights;
5. Enhance the street frontage (where applicable) taking account of local character;
6. Incorporate or reflect materials and detailing on existing dwellings, in accordance with policy LP 1 Local Character and Design Quality;
7. Retain or re-provide features important to character, appearance or wildlife, in accordance with policy LP 16 Trees and Landscape;
8. Result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens, in accordance with policy LP 8 Amenity and Living Conditions;
9. Provide adequate servicing, recycling and refuse storage as well as cycle parking;
10. Result in no adverse impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.

In considering backland schemes, regard will be had to density and dwelling type, the London Plan Density Matrix and public transport accessibility.

Character Design & Layout

No issues with the principle of redevelopment with the retention of the existing BTM (2 buildings). The existing jumble of industrial structures are not a very positive visual feature from the railway line.

The NPPF attaches great importance to the design of the built environment, stating that good design is a key aspect of sustainable development and should contribute positively to making places better for people. It stresses the need to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings and smaller developments. Whilst it states that LPAs should not impose architectural styles or particular tastes, it reinforces that it is important to consider local character and distinctiveness.

Policies CP7 and DM DC1 of the Council's adopted Development Plan are consistent with the aims of the aforementioned statements. Policy DM DC1 states that new development must be inclusive, respect local character, including the nature of a particular road, and connect with, and contribute positively to, its surroundings based on a thorough understanding of the site and its surroundings. The thrust of the above policy is carried forward within emerging Policy LP1 of the publication version of the Local Plan.

As noted in the above chapters, the surrounding area comprises a range of land uses and building typologies. Buildings within the area general locality range from single to 5 storeys. The site itself is situated to the rear of buildings associated with the Twickenham Film Studios and would be accessed by way of an existing driveway from Arlington Road. Due to its rear siting, it would be considered unlikely that any future development would be visible from the Arlington Road streetscene. Notwithstanding this, the rear of the property has frontage to a railway. The site contains two locally listed Buildings of Townscape Merit (BTM) which would be retained and re-used as office use as part of the proposed scheme.

The proposals include the construction of a 'main building' comprising 2 levels and a double mansard roof. Noting the form and proportions of the double mansard, this building would be considered as comprising 4 storeys. Similarly, a 'small block' is proposed which would comprise 2 storeys and an additional large single mansard. Again, due to the form and proportions of the mansard roof, this building would also be considered as comprising 3 storeys. Whilst the proposed heights would be similar to other existing properties within the local area, the scheme due to its rear siting would be highly visible from the railway line. The views to and from St Margarets/Twickenham Stations should therefore be appropriately considered as part of any formal submission. Despite being setback 3-4m from the shared boundary with the railway, it would be considered that a 4 storey building at a length of approx. 36m would not be characteristic of development along this important approach route into St Margarets and Twickenham. This is therefore considered to be out-of-character with the grain of the area, and would not be supported. In addition to its bulk and scale, the proposal would include two excessively large common areas for stairway and lift access. This would result in a direct impact when viewed from the rail line by way of two approximately 4m wide

(22% of frontage) unarticulated service enclosures for the full height of the building. The proposed fenestration to these service enclosures would do little to enhance the appearance of the building when viewed from the railway, which would be considered as too bulky and uncharacteristic of the lower density nature of the approach route into St Margarets.

Concerns are raised in relation to the appearance of the double mansard roof, as it would result in an untypical top heavy look with a comparable height to the host building. The proposed height of, effectively 4 storeys, would fail to consider and relate to the scale of the BTM's and other surrounding development. Whilst it is acknowledged that some taller blocks of flats exist in Arlington Road, these are generally on larger footprints with fewer constraints for larger scale development. Council would consider that the loss of at least one level should be considered prior to submitting a formal application.

The proposed balconies would appear to provide sunlight access to dwellings, as well as allow for private amenity space for occupiers. However, it is noted that they would protrude from the front and rear elevation for nearly the full width of each façade. It would be considered that the balconies would therefore appear incongruous and dominate the appearance of the main building, particularly when viewed from the railway line. The type of balconies proposed would also further alienate the building from the characteristics of the adjacent BTM's. It would be considered that balconies that are set-in from the front and rear elevation would result in a greater relationship with the architectural characteristics of the BTM's and achieve greater consistency with Policies DM DC6 and LP8 which state that *'Balconies or terraces on roof of main buildings can be visually intrusive...'* and that they should be *'designed to provide some shelter and privacy to neighbouring properties, either by using screens or by setting the balcony back within the façade'*.

The size of windows proposed would be considered as being excessively large and do not add to the visual interest of the main building. With regard to the front and rear elevations, windows are generally in the form of sliding doors providing access to balconies. Given the size of the balconies, as well as the number of openings proposed, it would be considered that these windows dominate the façade of the building. In addition, the double mansard windows are of a comparable size to those proposed on the levels below. It would be considered that they are not typical of a mansard window and add to the bulk and top heavy nature of the overall appearance of the building.

With reference to the 'small block', this would also need to better relate to the form and proportions of the existing adjacent BTM's. Whilst this building does not comprise a double mansard, it would be considered that its roof height, form, scale, bulk and mass of a would appear overbearing and dominate the adjacent BTM's. A flat or significantly lower mansard roof would therefore be considered more appropriate for this building, given its context. Similar objections would be raised in relation to the proposed fenestration, which would appear too large on all elevations and the mansard roof. Whilst the use of glazing bars would add some interest to the front and rear elevations, window sizes should be reduced as part of a revised scheme. The submitted drawings do not reference materials, but Council would discourage the use of unsustainable materials, such as uPVC, particularly noting the traditional architectural features present at the adjacent BTM's.

The submitted Design and Access Statement makes reference to the London Plan's Density Matrix, noting the sites Public Transport Accessibility Level (PTAL) rating of 3, size and surrounding context. The schemes compliance with the Density Matrix would not be disputed by Council noting the site could be considered as being within an urban setting and the proposed number of dwellings is far less than the suggested 70-170. Notwithstanding this, it would be considered that the London Plan's Density Matrix should be used as guidance to inform densities across London generally. It does not consider specific site constraints, or compliance with relevant local policies. On this basis, whilst consistent with the guidance with the London Plan's Density Matrix is achieved, for the reasons outlined above and within this report it would be considered that the current scheme would represent an over development of the site.

Policies DM OS6 and LP31 require the provision of open space with the aim of striking a balance between private, semi-private and public open space provision. An Open Space Assessment is

required in any future submission which demonstrates the hierarchy of open space and levels of public accessibility provided within the proposed development. The current scheme does not propose any public open space. Perimeter landscaping would not be considered sufficient to address policies DM 0S6 and LP31. It would also be considered that the site does not have quick or easy access to public open space within the surrounding area.

Views and Vistas

Policies DM HD7 and LP 5 state that the '*Council will protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area*' and '*... seek opportunities to create attractive new views and vistas and, where appropriate, improve any that have been obscured*'.

A View Protected Line traverses the site in an east west direction. The site is also situated within a View Protected Indicative Zone protecting the views from near Ham House to Orleans House. Whilst it is noted that 4-5 storey buildings exist within the local area, it is currently unknown as to whether they are subject to the same protected view designations. Any formal application would therefore need to demonstrate that no harm would be caused to the wider views from Ham House and Orleans House. This would need to be demonstrated by way of computer-generated imagery (CGI) and visual impact assessments in order to satisfy the requirements of LP 5 and DM HD7.

Residential amenity

Policy DM DC5 states that in considering proposals for development, the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance. This is reiterated in Policy LP8.

It is noted that the subject site is situated adjacent to Twickenham Studios and a railway line. It would be considered that the site is somewhat tucked away from nearby residential properties and would therefore be unlikely to result in significant harm to the neighbouring amenities of occupiers within the surrounding area. Although the proposal would allow for overlooking to the rear of properties west of the railway line (fronting Heathcote Road) it is noted that the proposed buildings would be sited approximately 40m from the rear elevation of those dwellings. It would therefore be considered unlikely that any detrimental impacts to the privacy of occupiers of those dwellings would occur.

In addition, the siting of buildings proposed would be arranged in a manner that would ensure that it would be unlikely for significant harm to occur to future occupiers of the indicative scheme.

In light of the above, Council would not raise any in-principle objections to the current proposal based on loss of privacy and/or access to daylight.

Transport and Highway Safety

Car parking

Policies DM TP8 and LP45 outline that developments must demonstrate an appropriate level of off-street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions. It is further stated that in areas with a low PTAL rating (1-4), it is particularly important that parking standards are met. The site has a PTAL level of 3 which denotes a moderate accessibility to public transport. The parking requirements of the site need to be provided in accordance with the Parking Standards set out in Appendix 4 of the DMP, including refuse vehicle access across the scheme.

The parking spaces proposed include 1 space for every 1 and 2 bedroom unit and 1.5 spaces per 3 bedroom unit. A total of 25 parking spaces would have been proposed for the residential element of the scheme, which would be 1 less than the 26 required. A further 2 parking spaces would be proposed for the commercial units. Submitted drawings also indicate that a total of 2 disabled/accessible parking spaces would be provided with the proposed scheme. Whilst these figures appear broadly consistent with policy requirements, further clarification would be required prior to the submission of a formal planning application with regards to the types of commercial uses

proposed.

The Transport Officer was consulted with during the assessment period of the pre-application. The following concerns were raised:

1. On site car parking required is 26 for the residential. Commercial parking should be calculated on gross floor area. It would be suggested that a minimum of 1 parking space per commercial unit be proposed.
2. The applicant needs to clarify the in use and occupancy as well as intended car parking and servicing provision
3. An S106 agreement to remove access to resident/business/all zones/visitor permits and contracts in council run car parks for the site may be required and agreed prior to permission being granted as part of a planning application.
4. Cycle storage must be covered, secure and weatherproof for the residential and staff of the commercial. Separate stores for each use. Visitor cycle parking should be provided which is covered and overlooked. It should also be demonstrated that cycle storage is situated within an accessible location.
5. Residents must not walk more than 30m to deposit their refuse. Refuse/recycling stores to be shown clearly on plan with the number of required receptacles in each. Separate stores required for the different uses.
6. CMS in draft form required
7. Service and Delivery Plan to be provided with any formal submission of a planning application

Cycling

DM TP7 seeks provision of appropriate cycle access and sufficient, secure cycle parking facilities. This is reiterated in LP44. The minimum cycle parking requirement for the residential units is 23 spaces. Cycle parking for visitors would also need to be provided. It would appear that a total of 26 cycle parking spaces would be provided on-site. However, whilst the location of cycle storage is shown on the submitted Proposed Ground Floor Plan, details have not been provided showing what the cycle storage would look like, and so it has not been possible to assess its impact on the character and appearance of the streetscape. In addition, it would appear that the cycle stands would not be secured within covered storage. This would need to be addressed prior to the submission of a formal application.

Cycle parking for the proposed B1 uses should be provided at a rate of 1 space per 150sqm for long-stay and 1 space per 5,000sqm per short stay.

Pedestrians

Regarding the proposals for shared-use streets between pedestrians, cyclists and motorists, the Council would need to be satisfied that the safety of pedestrians and cyclists would not be compromised. It is noted that the proposal does not include changes to the vehicular access point to the site. Details have not been provided showing how pedestrians would gain safe access to the site. A formal planning application should detail how pedestrians would enter and leave the site safely.

Refuse & Waste

The Council's Residential Development Standards require that secure storage be provided on-site for refuse and recycling bins. Further details can be found in the Council's Refuse and Recycling Storage Requirements SPD. Details would need to be shown on plan in a formal application.

It is also noted that the site layout does not provide sufficient area for a refuse/recycling vehicle to enter and exit the site in a forward gear. It would be likely that under the current scheme a refuse/recycling vehicle would be required to reverse into the site in order to exit in forward gear.

The SPD Refuse and Recycling Storage Requirements notes 'In the event that it is not possible to create permeable through routes for collection vehicles, British Standard (BS 5906: 2005) recommends a maximum reversing distance for vehicles of 12m'. Therefore, the distance required to reverse into the site would be in excess of that suggested within the SPD. The submission of any formal planning application should demonstrate that refuse and waste could be collected on-site in a manner that is safe and in accordance with the requirements of the above-mentioned SPD.

Transport, servicing and construction

A Draft Construction Method Statement would need to be submitted with any formal application. Narrow roads should be taken into account and access to the area is limited by this. Use of articulated vehicles would not be permitted. Operative car parking will be very sensitive and must be accommodated on site.

A Transport Statement would be required, and should include current/new trip generations and current speeds and car generation on roads leading to the site. Surveys would need to be undertaken, and the applicant would be required to contact the Council's Transport Department to discuss appropriate methodologies and scope.

Sustainability.

Should the proposed redevelopment be considered acceptable, future scheme would be required to comply with the following:

- Conform to the Sustainable Construction Checklist SPG
- Achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation unless it can be demonstrated that such provision is not feasible.
- Achieve a minimum 35% reduction in carbon dioxide emissions over Building Regulations 2013.
- Achieve water consumption targets of 105 litres or less per person per day, and 5 litres or less per head per day for external water use.
- Comply with Lifetime Homes Standards
- Living roofs (70% roof coverage)

Future applications would need to be accompanied with a completed Sustainable Construction Checklist, an Energy Statement and Lifetime Homes Standard Statement to demonstrate compliance with the above.

Should future schemes fail to comply with the above standards then evidence would need to be provided to justify departure from these.

Ecology and biodiversity

Policy DM OS5 states that all new development will be expected to preserve and where possible enhance existing habitats including river corridors and biodiversity features, including trees. All developments will be required to enhance existing and incorporate new biodiversity features and habitats into the design of buildings themselves as well as in appropriate design and landscaping schemes of new developments with the aim to attract wildlife and promote biodiversity, where possible. When designing new habitats and biodiversity features, consideration should be given to the use of native species as well as the adaptability to the likely effects of climate change. New habitats and biodiversity features should make a positive contribution to and should be integrated and linked to the wider green and blue infrastructure network, including de-culverting rivers, where possible. The thrust of this policy is reiterated in LP15 and LP16.

As the site is completely modified for the use of industrial operations, the Council would not be looking to the applicant to undertake a phase 1 habitat survey as a baseline appraisal of a site's ecology. The introduction of new trees and landscaped areas is welcome, though it would be requested that these are of native species. Other measures of preserving and enhancing ecology and biodiversity would be encouraged. Further landscaping information, including landscape master

plans and an ecological enhancement plan should be provided as part of any formal planning application.

Environmental Impact Assessment

Environmental Impact Assessment may be required for the proposed redevelopment as such we would advise you to submit a request for Screening Direction to ascertain whether an EIA would be required.

Other Material Considerations

No information has been submitted on the following planning matters which would need to be addressed in any forthcoming application:

- Contamination
- Ecology
- Light pollution
- Sustainable Urban Drainage System
- Utilities Infrastructure
- Archaeological Assessment
- Daylight and Sunlight
- Statement of Community Engagement

Council would advise that the National and Richmond Council's Local Validation checklist in relation to the submission of planning applications be reviewed prior and attach the relevant web-site link below as well as having regard to the comments in the preceding paragraphs.

http://www.richmond.gov.uk/local_validation_checklist_september_2016.pdf

Council would also advise that consultation with Network Rail, Environment Agency and Thames Water be undertaken during the design process of future schemes.

Planning Obligations and CIL

In addition to the Affordable Housing contribution noted above, financial contributions and planning obligations may be sought for the proposed scheme in line with the Planning Obligations SPD. Notwithstanding this, the application would be liable to pay the Mayoral and Borough Community Infrastructure Levy. Further information can be found on our website.

Planning Performance Agreement

Should a future scheme be pursued with this Council, it would be advised that on major applications further meetings and planning guidance at both pre-application and pre-determination stages be undertaken in accordance with a Planning Performance Agreement.

Conclusion

In view of the above there is an in principle objection to the loss of existing employment floorspace unless it can be demonstrated there is no demand for the continued use of the premises in existing use or other employment generating uses through a full and proper marketing exercise of a minimum of 2 years. In addition, the bulk and mass of the proposal would be considered to be of a significantly larger scale than other development within the local area and the important approach route into St Margarets and would fail to complement the characteristics and size of the existing BTM's to be retained. In particular, Council would object to the proposed double mansard roof and the appearance of the communal areas providing access to units within the main building.

Without prejudice

Any advice given by Council officers for pre-application enquiries does not constitute a formal response or decision of the Council with regards to future planning consents. Any views or opinions expressed are given in good faith and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the

Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications.

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstances may change or come to light that could alter the position. It should be noted that if there has been a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes.

I hope that the above comments are viewed as constructive and of assistance when submitting any future application.

Yours sincerely

Mr Chris Tankard
North Area Team Manager
London Borough of Richmond Upon Thames

Appendix 2

Invitation to public exhibition for Arlington Works, Arlington Road, Twickenham, TW1 2BB



Indigo Planning, on behalf of Sharpe Refinery Service Ltd, invite you to attend a public exhibition to provide feedback on the proposed redevelopment of the site at Arlington Works, Arlington Road, TW1 2BB.

A planning application will be submitted to the Council and we are holding a public exhibition to explain our proposals and provide an opportunity for you, as residents, to ask questions and provide feedback.

The proposed development is for a mixed use scheme comprising 23 new residential units and employment space along with car and cycle parking and landscaping.



Indicative image

Exhibition

Date: Tuesday 12 June 2018
Time: 3:30pm – 7pm
Location: Turner (Green Room) in the ETNA
Community Centre, 13 Rosslyn Road,
St. Margarets, TW1 2AR

Contact

Please get in touch with us if you have any questions.
A: Indigo Planning, Aldermary House,
10-15 Queen Street, EC4N 1TX
W: indigoplanning.com
E: comment@indigoplanning.com
T: 020 3848 2500

Appendix 3



Arlington CI

Appendix 4

Introduction to the Site

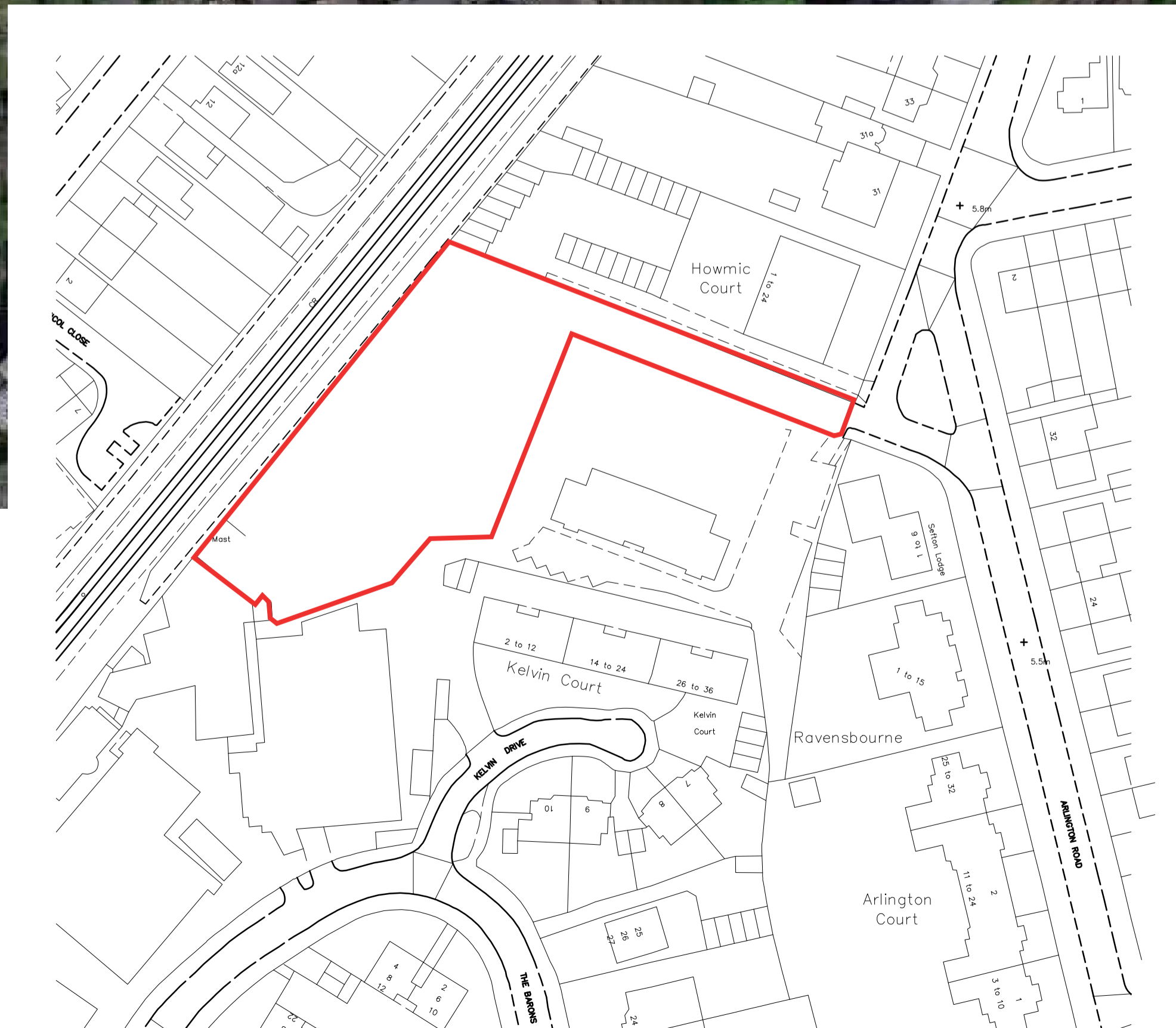


The current owners of the Sharpe's Recycling Oil Refinery at Arlington Works are seeking permission for the redevelopment of the site.

The proposal will see the existing oil refinery decommissioned, removing this incongruous use from the local residential area. The dilapidated workshops will also be demolished, decontaminating the site to create a new mixed-use (commercial and residential) development.

It is proposed to provide small self-contained commercial units within the refurbished Victorian cottage building (designated as a Building of Townscape Merit) and to provide 24 new one, two and three bedroomed flats with car parking and landscaped amenity spaces.

This proposal has been developed following an extensive period of pre-application review and will continue to be developed for the submission of a full planning application. This presentation illustrates the opportunities and constraints for redevelopment and how the design addresses these to provide an appropriate redevelopment proposal.



Site location plan



Approach to the site

Existing Site Plan



Existing view of the site

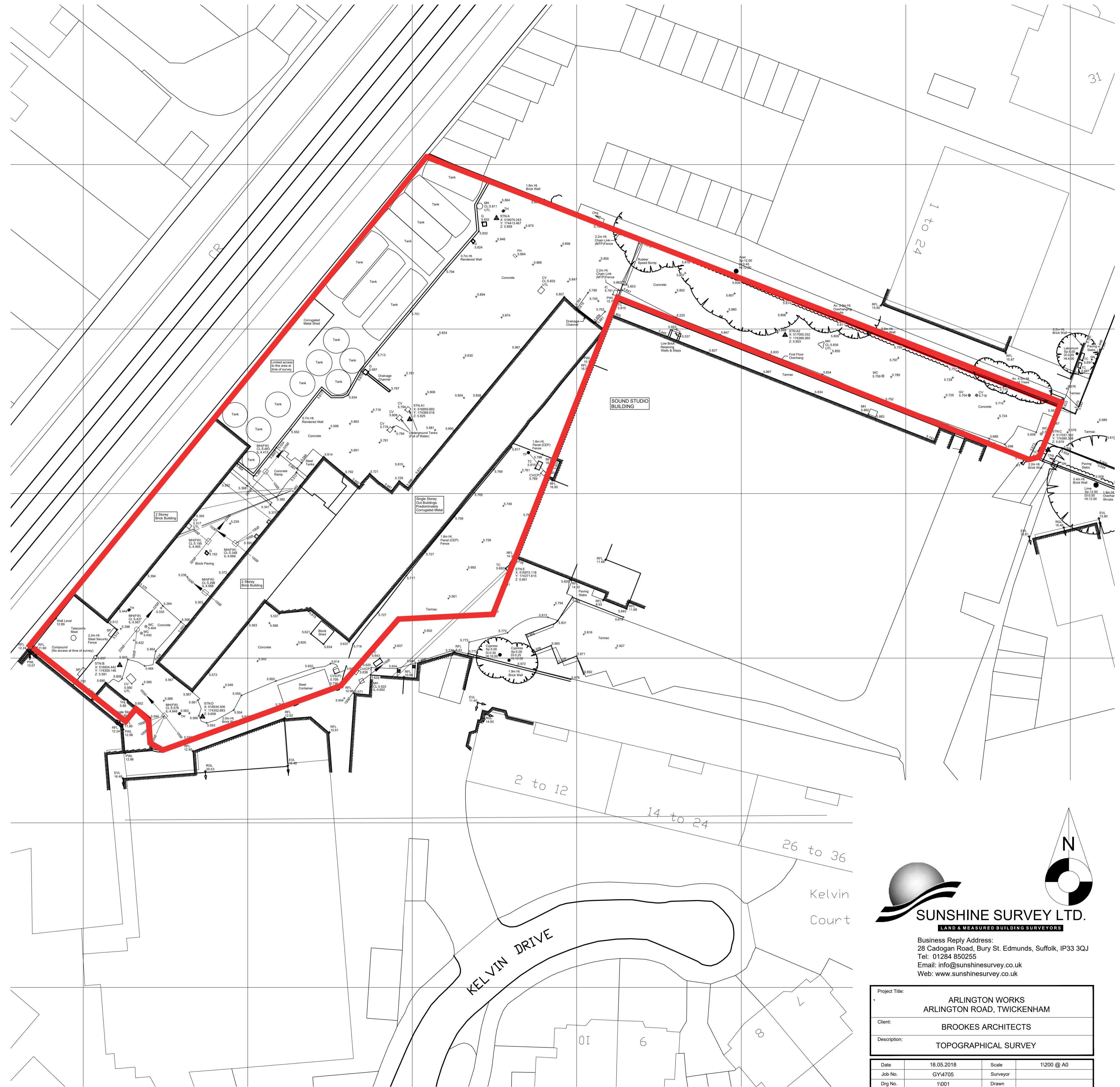
This is an initial consultation exercise, to present our proposals and to seek the views of local residents and neighbours prior to the scheme being prepared for planning submission and the formal consultation that will form part of the application process.

The oil refinery business is no longer viable, employing only a skeleton staff. Despite having been established for many years It is inappropriate and far from compatible with the residential context.

We believe that redevelopment will reduce the impact caused by the disturbance of the oil tankers accessing the site through the residential area and the unpleasant fumes and smells aroma caused by the refinery process.

The workshops, although currently rented out, are in a very poor state of repair, verging on being dilapidated. They provide a very poor quality of accommodation and do not provide any comfort / thermal efficiency. The redevelopment will provide better and more comfortable accommodation, and create the potential for a greater level of employment, as well as providing much needed additional housing.

Redevelopment of the site could make much better use of the site. A mixed-use redevelopment would be more in keeping with the surrounding area. It will provide the opportunity to remediate ground contamination, and would remove the risk of further contamination and from oil storage in a predominantly residential area.



Business Reply Address:
28 Cadogan Road, Bury St. Edmunds, Suffolk, IP33 3QJ
Tel: 01284 850255
Email: info@sunshinesurvey.co.uk
Web: www.sunshinesurvey.co.uk

Project Title:		ARLINGTON WORKS ARLINGTON ROAD, TWICKENHAM	
Client:		BROOKES ARCHITECTS	
Description:		TOPOGRAPHICAL SURVEY	
Date:	18.05.2018	Scale:	1:200 @ A0
Job No.:	GY14705	Surveyor:	
Orig No.:	1001	Drawn:	

Proposed Site Plan

Area Schedule - Offices			
Level	Type	NSA (m ²)	NSA (ft ²)
C1			
00 - Ground Floor	Office / Commercial	42 m ²	454 ft ²
01 - First Floor	Office / Commercial	42 m ²	454 ft ²
C2			
00 - Ground Floor	Office / Commercial	51 m ²	553 ft ²
01 - First Floor	Office / Commercial	51 m ²	553 ft ²
C3			
00 - Ground Floor	Office / Commercial	40 m ²	429 ft ²
01 - First Floor	Office / Commercial	40 m ²	429 ft ²
C4			
00 - Ground Floor	Office / Commercial	38 m ²	410 ft ²
01 - First Floor	Office / Commercial	38 m ²	409 ft ²
C5			
01 - First Floor	Office / Commercial	41 m ²	442 ft ²
00 - Ground Floor	Office / Commercial	41 m ²	443 ft ²
C6			
01 - First Floor	Office / Commercial	49 m ²	528 ft ²
00 - Ground Floor	Office / Commercial	49 m ²	528 ft ²
C7			
00 - Ground Floor	Office / Commercial	43 m ²	468 ft ²
01 - First Floor	Office / Commercial	43 m ²	468 ft ²
Total		610 m²	6568 ft²

Area Schedule - Residential					
Number	Type	No beds	No persons	NSA (m ²)	NSA (ft ²)
Unit 1	Residential	2	4	74 m ²	797 ft ²
Unit 2	Residential	2	3	62 m ²	667 ft ²
Unit 3	Residential	2	4	62 m ²	667 ft ²
Unit 4	Residential	1	2	51 m ²	545 ft ²
Unit 5	Residential	3	4	76 m ²	819 ft ²
Unit 6	Residential	3	4	76 m ²	823 ft ²
Unit 7	Residential	1	2	51 m ²	545 ft ²
Unit 8	Residential	2	4	76 m ²	815 ft ²
Unit 9	Residential	2	4	76 m ²	815 ft ²
Unit 10	Residential	1	2	51 m ²	545 ft ²
Unit 11	Residential	3	4	76 m ²	819 ft ²
Unit 12	Residential	3	4	76 m ²	823 ft ²
Unit 13	Residential	1	2	51 m ²	545 ft ²
Unit 14	Residential	2	4	76 m ²	815 ft ²
Unit 15	Residential	2	4	76 m ²	815 ft ²
Unit 16	Residential	1	2	51 m ²	545 ft ²
Unit 17	Residential	3	4	76 m ²	819 ft ²
Unit 18	Residential	2	4	72 m ²	776 ft ²
Unit 19	Residential	2	4	71 m ²	769 ft ²
Unit 20	Residential	2	4	78 m ²	840 ft ²
Unit 21	Residential	2	3	62 m ²	672 ft ²
Unit 22	Residential	2	3	62 m ²	672 ft ²
Unit 23	Residential	3	4	101 m ²	1088 ft ²
Unit 24	Residential	3	4	101 m ²	1088 ft ²
Total Units: 24				1684 m²	18124 ft²



All areas are approximate

Existing Site Photographs

PUBLIC CONSULTATION
JUNE 2018

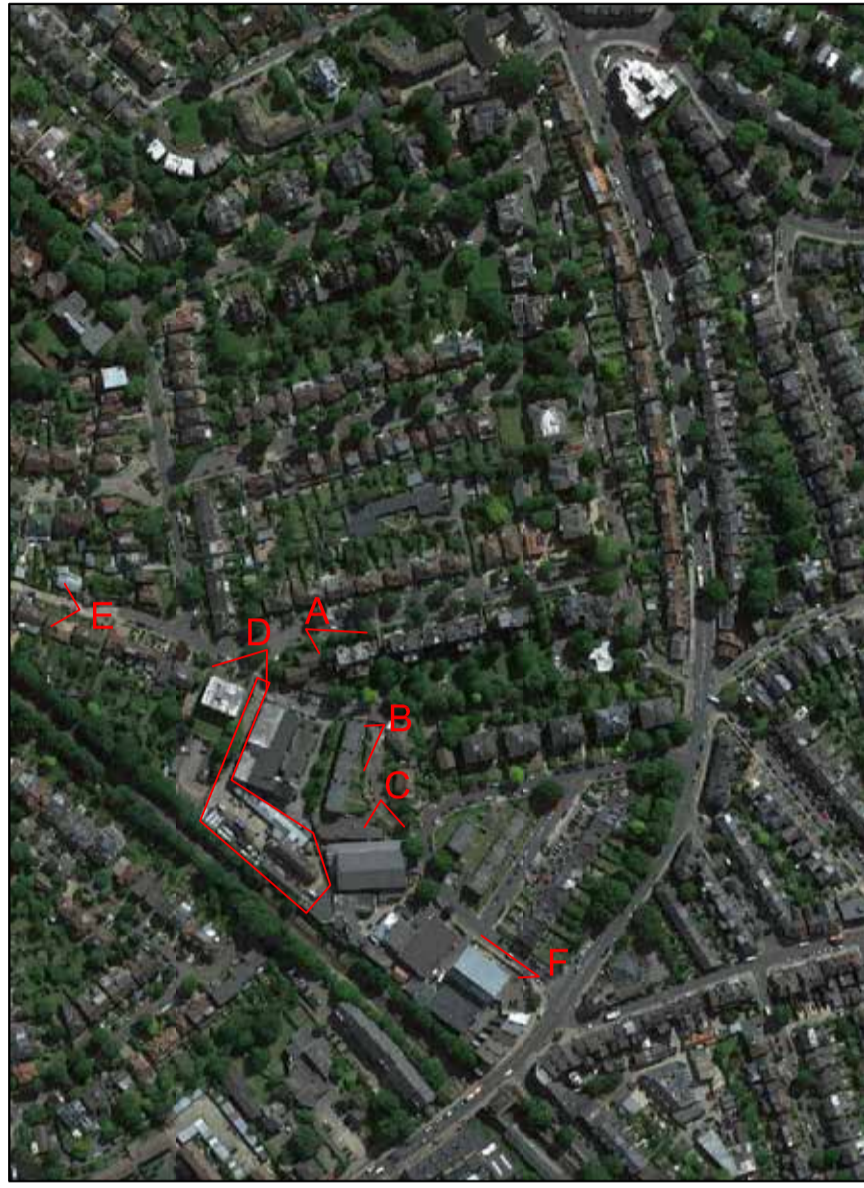
ARLINGTON WORKS
TWICKENHAM



Site Context Photographs

PUBLIC CONSULTATION
JUNE 2018

ARLINGTON WORKS
TWICKENHAM



A. Residential Arlington Road



B. Residential St Margarets Court



C. Industrial Twickenham Studios, Barons Drive



D. Residential Arlington Road



E. Residential Arlington Close



F. Residential and industrial Barons Road