



UNION4 PLANNING

SOLUM REGENERATION (TWICKENHAM) LLP

Station Yard, Twickenham, TW1

Proposed redevelopment of existing car park to provide a new building of 5 to 6 storeys, comprising 46 no. residential units (Use Class C3), disabled car parking, cycle parking, landscaping, enhancements to public realm and associated works

PLANNING STATEMENT

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Author(s): Tanya Kozak

Checked By: Alan Hannify, Steven Fidgett

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30 Stamford Street | London | SE1 9LQ
0207 122 0094
planning@union4.co.uk
www.union4.co.uk

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Executive Summary

This Planning Statement has been prepared by Union4 Planning on behalf of Solum Regeneration (Twickenham) LLP (hereafter referred to as 'Solum') in support of a full planning application (the Application) for the redevelopment of land at Station Yard, Twickenham (the site) to provide 46 no. residential units, disabled parking, cycle parking, landscaping, sedum roof, enhancements to the public realm and associated works.

The proposals were subject to pre-application consultation with Officers at the London Borough of Richmond upon Thames (LBRuT), the Design Review Panel and comments received from public consultation, which have helped to inform the proposals set out within this planning application.

The application site is currently used as a station related car park which is underutilised and is no longer required when the station redevelopment opens.

The open hardstanding of the car park creates a void in the surrounding built form and creates a poor setting for the other buildings fronting Station Yard, including the Albany public house, which is a building of local townscape merit.

The proposals therefore seek to address this gap in the townscape and help to frame the street frontage, to reflect the predominant street pattern and create an enhanced public realm. The proposals also make more efficient use of previously developed land and provide new, high quality residential accommodation which would sit comfortably within the existing urban context and complement the changing nature of the area surrounding Twickenham Station.

The site lies within the town centre of Twickenham and is in a highly accessible location. The proposed building comprises 38 no. 1-bed flats and 8 no. 2-bed flats to reflect the location and likely future demographic of the site. The proposals will include 5 no. flats that are wheelchair accessible, meeting Building Regulation M4(3). The proposed development is car free, to accord with policies within town centre locations, so no parking is proposed on-site, with the exception of 2 no. disabled bays.

The site lies within the defined town centre of Twickenham, which is one of the two principal locations for growth in the Local Plan spatial strategy. The development plan identifies this as a location where the majority of higher density housing will be targeted.

The site itself is also allocated for residential development in the Twickenham Action Area Plan. The principle of the development proposed is, therefore, supported by the Richmond Local Plan, the London Plan and NPPF.

There is also an expectation under the London Plan that on such brownfield sites within town centres and within areas of good transport accessibility, development densities will be optimised in order to achieve sustainable development and maximise their contribution to housing supply within London.

The site lies within an accessible urban area. It is not subject to any environmental or other designations that would restrict its redevelopment. It represents an underused, brownfield site that can and should contribute positively to regeneration.

The proposed scale and design of the building has been informed by the pre-application and Design Review Process. It responds positively to its setting and mediating between the smaller scale of the residential properties to the south and west, and the larger buildings along London Road to the east and north.

The siting of the development and layout also retains and helps frame key views of the neighbouring Albany Pub from Station Yard and London Road.

The design, materials and layout of the development has been informed by the site context, neighbouring buildings and former use of the site associated with the original Twickenham Railway Station. It is considered to respond appropriately to the residential areas to the south and west, and the larger buildings along London Road to the east.

The proposed development will be constructed with high-quality materials, which will be carefully selected, will be sympathetic to the nearby Conservation Areas and will reflect the surrounding uses and former use of the site. The use of brick facades and metal detailing reflects the station heritage.

The development will essentially be car-free, which is considered appropriate for a highly accessible site close to existing public transport infrastructure, with the exception of disabled parking located at the western end of Mary's Terrace.

The planning application is supported by a range of technical and environmental assessments, including transport, drainage, noise, air quality, microclimate, heritage, townscape and daylight and sunlight reports.

It is therefore, considered that the proposed development accords with the relevant adopted planning policies and associated guidance at the local, regional and national level and we would respectfully request that planning permission should be granted.

1.0 Introduction

- 1.1 Union4 Planning has been instructed by Solum Regeneration (Twickenham) LLP (hereafter referred to as 'Solum') to prepare a full planning application following pre-application advice received from London Borough of Richmond upon Thames (LBRuT) in respect of Station Yard, Twickenham, TW1 ('the Site').
- 1.2 The proposed development comprises a residential building with a height of 5 to 6 storeys comprising 46 no. residential units, disabled parking, cycle parking, landscaping, a sedum roof and enhancements to the public realm.
- 1.3 The site is part of an area allocated within the Twickenham Area Action Plan to provide a residential scheme of 3 – 4 storeys in height with re-provision of bus stands and a possible public car park if parking has been lost from other town centre development. It was determined through pre-application discussions that an increase in height is acceptable and that parking is not required as there remains extensive parking within the town centre.
- 1.4 In addition to this Planning Statement, the application comprises the following documents:
- Application Form and Certificates;
 - Covering Letter;
 - Plan Drawings;
 - Design and Access Statement; and
 - CIL Questions Form.
- 1.5 In addition, the planning application is supported by a range of specialist reports and inputs, which may be summarised as follows:
- Heritage Statement;
 - Public Realm Report;
 - Townscape Impact Assessment including verified views;
 - Transport Statement;
 - Phase I Land Contamination Desk Study;
 - Factual Report on Ground Investigation;
 - Daylight and Sunlight Assessment;
 - Energy and Sustainability Statement;
 - Drainage Strategy Report;
 - Air Quality Assessment;
 - Noise and Vibration Assessment;
 - Health Impact Assessment;
 - Construction Logistics Plan;
 - Preliminary Construction Management Plan;

- Delivery and Servicing Plan;
- Wind Microclimate Assessment;
- Structural Layout;
- Statement of Community Involvement.

1.6 The Planning Statement also includes commentary on ecology and an Arboricultural Impact Assessment.

The Applicant

1.7 Solum is a joint venture between Network Rail and Kier, established in July 2008, with a focus on providing new homes close to transport hubs and gateway destinations. They have completed schemes in Epsom, Christchurch and Haywards Heath and are currently building in Walthamstow and Twickenham with four further schemes in the pipeline.

1.8 Solum won the What House award for Best Partnership Scheme for their work with Waltham Forest Council and Islington and Shoreditch Housing Association in respect of the redevelopment of Walthamstow Central Station. The scheme provided much needed housing for the borough along with an improved public realm and new station square, as well as a mix of business uses.

1.9 Solum's work in Twickenham includes the transformation of Twickenham Station which is currently underway and will provide a modern railway station on a new public plaza, creating a gateway to Twickenham. The redevelopment will also provide 115 new homes, additional cycle parking, new shops and a new pedestrian route.

Structure of the Planning Statement

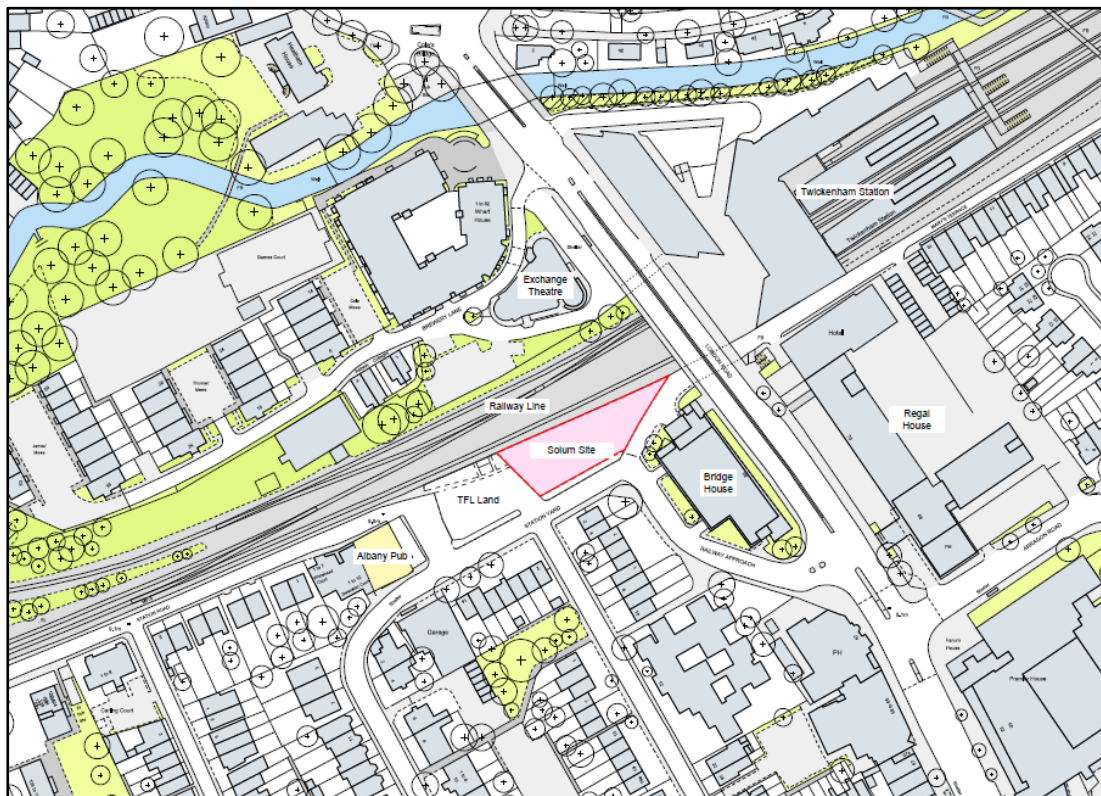
1.10 This Planning Statement is structured as follows:

- Section 2 provides an overview of the application site's location and description, including details of the site's relevant planning history;
- Section 3 describes the proposed development;
- Section 4 sets out the policy context pertaining to the proposals;
- Section 5 summarises the Council's pre-application advice;
- Section 6 outlines the planning and environmental considerations;
- Section 7 provides a summary and conclusions.

2.0 Site Location and Description

2.1 The site is located centrally within Twickenham in the London Borough of Richmond upon Thames. It is approximately 0.10 ha in size and is located on the northern side of Station Yard which forms the southern site boundary. The site is bound to the north by the railway line, Mary's Terrace to the east and land belonging to Transport for London (TfL) to the west. Twickenham Railway Station is approximately 75m to the northeast.

Figure 1: Site Location



Source: Wimshurst Pelleriti (2019)

2.2 The site was previously utilised for purposes associated with the railway and is currently used as a car park by residents of Mary's Terrace in connection with development works at Twickenham Railway Station. This use will cease on completion of the station redevelopment. The adjacent TfL land is used as event day and emergency parking for buses and a turning circle. Beyond the TfL site is the Locally Listed Albany Pub.

2.3 On the southern side of Station Yard are a number of three-storey terraced residential properties and the five-storey commercial Bridge House to the southeast. Opposite the railway line to the north is a recently completed mixed-use development at Brewery Yard comprising a number of three- to six-storey buildings, including the theatre at Exchange House.

- 2.4 The site is situated within an area largely dominated by major regeneration schemes including Brewery Yard and the redevelopment of Twickenham Station which will provide a new station, retail shops, car and cycle parking and new residential units. The redevelopment of Twickenham Station comprises buildings ranging between two and seven storeys in height.
- 2.5 The ten-storey building known as Regal House located to the east of the site on the opposite side of London Road, now a hotel with offices and ground floor A3/A5 uses.
- 2.6 The site is allocated for residential development within the development plan.
- 2.7 The site itself is not subject to any constraints or designations. However, it is within close proximity to Cole Park Road Conservation Area to the north, Amyand Park Road Conservation Area to the east and Twickenham Riverside Conservation Area to the south. Located some 50m west of the site is Queen's Road Conservation Area which is the most pertinent heritage designation in relation to the proposals given its direct views to the site.
- 2.8 There are no statutory listed buildings within or adjacent to the site, but there are a number of local buildings of townscape merit (referenced as Locally Listed properties) nearby which are set out below.
- Nos. 1-16 Marys Terrace;
 - Albany Public House, Queen's Road;
 - Nos. 2-8 (even) and Nos. 3-7 (odd) Queen's Road;
 - Cabbage Patch Public House, London Road;
 - Nos. 1-4 Railway Cottages;
 - Disused Industrial Building Southwest of Railway Cottages.
- 2.9 Of particular note is the closest of these, facing the TfL land, the Albany Public House, a three-storey stucco building on an island site which is situated to the west of the application site. The pub is a key landmark building within the area, located at the northern end of Queen's Road Conservation Area.
- 2.10 The site is located within Flood Zone 1. Land and property in Flood Zone 1 have a low probability of flooding.
- 2.11 The major part of the site has a high PTAL rating of 5 meaning that the site has good accessibility to public transport.

Planning History

- 2.12 The planning history for the site is set out in the table below.

Reference	Description	Decision
95/0286/FUL	Change of use of land for storage of cars and commercial vehicles	Granted permission 22/06/1995
92/1464/FUL	Use of land as public car park	Decided as no further action be taken 13/01/1993

Surrounding Development

- 2.13 The planning history has also been provided below for the Brewery Lane development and redevelopment of Twickenham Railway Station due to their relationship with the application site, their influence during the design process and as a representation of the changing nature of the area.

Reference	Description	Decision
12/3650/FUL	Demolition of existing buildings and redevelopment of the site to provide a mixed use development comprising of a 3 to 5 storey building accommodating 82 residential units (16 affordable and 66 private sale), 2 restaurant units (A3 Use Class) with basement car and cycle parking, associated plant equipment and courtyard area; Erection of a 2 to 5 storey community building with associated outdoor space; 28 houses with associated car parking and gardens; New public space, internal access road, landscaping and associated infrastructure and utilities Twickenham Sorting Office, London Road, Twickenham, TW1 1EE	Granted permission 06/03/2014

11/1443/FUL	<p>Demolition of existing station building and access gantries to the platforms and a phased redevelopment to provide; 1. Removal of existing footbridge structures, adjustment of existing platform canopies and rebuilding of a section of the London Road wall. Erection of a podium over the railway lines, to incorporate green wall and decorative screening panels, and a new bridge structure providing access from the existing station building to the station platforms. Relocation of out of hours access bridge. (Phase 1) 2. A new station concourse with stair and lifts to platform level; three buildings ranging in height between 7 storeys and 2 storeys (where measured from London Road Bridge) comprising 115 residential units, 734 sq.m of flexible Use Class A1 (shops), A2 (Financial and Professional Services) and A3 (restaurant and cafe) floorspace, plant space, a combined heat and power plant, and green roofs; sustainable transport facilities to include a taxi rank, kiss and ride and car club spaces, 27 commuter car parking spaces (including disabled spaces), 7 residents disabled spaces, delivery and servicing spaces, electric car charging points, 250 covered cycle spaces for commuters and 208 covered cycle spaces for residents; provision of a new station plaza, river walkway including children's playspace, soft and hard landscaping; and off site highway works to include the relocation of the existing bus stop (Phase 2)</p> <p>Twickenham Railway Station, London Road, Twickenham, TW1 1BD</p>	<p>Granted permission 30/03/2012</p>
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3.0 Proposed Development

3.1 The proposed development may be summarised as follows:

"Proposed redevelopment of existing car park to provide a new building of 5 to 6 storeys, comprising 46 no. residential units (Use Class C3), disabled car parking, cycle parking, landscaping, enhancement to public realm and associated works."

3.2 The scheme has been designed in consultation with stakeholders, design review panel and following pre-application discussions with LBRuT. Full details of the design evolution and rationale are included within the Design and Access Statement.

Residential Mix

3.3 The proposal involves clearance of the site and construction of a new residential building comprising 38 no. one-bed apartments and 8 no. two-bed apartments. The proposed residential mix reflects the likely demographic of future occupiers given the site's location within the town centre.

Table 1: Proposed Residential Mix

Level	1B1P 37sqm	1B2P 50sqm	2B4P 70sqm	Total
Ground	3	3	0	6
First	2	4	2 (1 no. WAU)	8
Second	2	4	2 (1 no. WAU)	8
Third	2	4	2 (1 no. WAU)	8
Fourth	2	4	2 (1 no. WAU)	8
Fifth	6	2 (1no. WAU)	0	8
Total	17	21	8	46
%	37%	46%	17%	100%
38 no. 1-bed apartments 83%		8 no. 2-bed apartments 17%		

- 3.4 All units will comply with the required Nationally Described Space Standards which are set out below.

Table 2: Nationally Described Space Standards

Number of bedrooms / persons	Minimum gross internal floor area (sqm)	Built in storage (sqm)
1B1P	39 (37)*	1.0
1B2P	50	1.5
2B4P	70	2.0
<p>Notes:</p> <p>* Where a 1b1p has a shower room instead of a bathroom, the floor area may be reduced from 39 sqm to 37 sqm.</p> <p>A minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged to address overheating and ensure appropriate ventilation and daylight.</p>		

- 3.5 The proposed development aims to provide both good quality new homes in a sustainable part of the Borough but also aims to enhance the townscape character of Station Yard by filling a void in the current street scene, recreating a new street frontage and improving the public realm and pedestrian movement.

Siting, Scale and Massing

- 3.6 The proposed development will comprise a single building rising to a maximum of 5 to 6 storeys. The building will be stepped back at 5th floor level to provide a strong shoulder height of 5 storeys and help mediate between the larger forms of buildings framing London Road and those to the south and west around Station Yard and Queens Road.
- 3.7 The siting of the building proposed has been designed to help frame the street edge in a manner that reflects form seen within much of the street pattern in the area and to help frame key views and end points to views within Railway Approach and Station Yard.
- 3.8 The proposed scale and massing reflects the form supported by the Design Review Panel and the articulation of the facades has been carefully considered to ensure it sits comfortably within its existing context.

Figure 2: Southern Elevation of Proposed Development



Source: Wimshurst Pelleriti (2019)

Access, Servicing and Parking

- 3.9 The main entrance to the proposed development will be via Station Yard and located centrally on the southern frontage of the building. There is a further secondary entrance located centrally at the rear of the building, accessed securely by gates from either side of the building.
- 3.10 To ensure that the building is Part M compliant and accessible by all, it is proposed to incorporate a ramp system within the building circulation, rising up 600mm to the finished floor level of the ground level flats. The rear entrance will also incorporate external ramps to provide level access to the building from this area.
- 3.11 No car parking is proposed with the exception of the provision of 2 no. disabled spaces which will be located to the east of the building.
- 3.12 A total of 55 no. cycle parking spaces will be provided in accordance with London Plan standards which requires 1 long-stay space per studio/1-bed unit, 2 long-stay spaces for all other dwellings, as well as 1 short-stay space per 40 units. Secure cycle storage facilities will be located at ground floor level and accessed via the rear of the building adjacent to the railway line.
- 3.13 Servicing for the site will take place at the service area to the rear of the building with access continued to be taken via Mary's Terrace. At present, the western end of Mary's Terrace is closed with controlled barriers allowing for emergency access only which would be maintained.
- 3.14 It is proposed to incorporate a substation within the northeast portion of the building at ground floor level. Whilst an external substation was originally proposed, there was insufficient space to provide the 10m offset parameter required by UKPN for access purposes. Access to the substation will be available 24 hours a day.

Landscaping

- 3.15 The landscape strategy aims to enhance the public realm and introduce softer elements to the current hard landscape, as well as enhancing native species to provide ecological enhancement.
- 3.16 The landscape strategy for the development seeks to enhance the overall townscape by introducing new street trees and shrub planting in key locations within the site and in the adjoining public realm. It aims to address the lack of soft landscape elements and introduce new, climate resistant species to help ensure their long-term development. Planting is proposed along the frontage of the building onto Station Yard to provide a soft edge to the street and complement the limited street trees already present.
- 3.17 There are no trees on site or affected by the development itself. The existing street trees near the TfL land are in a poor condition and subject to agreement with LBRuT are proposed to be replaced with more appropriate species and supplemented by new tree planting at key points around the site.
- 3.18 Whilst not part of the proposals, it is understood that LBRuT are undertaking public realm improvements around the Albany Pub and Station Yard area which have informed the application proposals and formed a basis for the additional hard and soft landscape works proposed to further enhance the public realm. This will also improve the overall outlook of the area and complement the proposed development.
- 3.19 It is also proposed that the railway boundary wall will be rebuilt as part of the application proposals.

Ecology

- 3.20 The site comprises a car park at present with no nature conservation features. As part of the development, it is proposed to enhance the overall nature conservation potential by using native species within the landscaping wherever possible, through the introduction of an extensive sedum green roof and the use of bird and bat boxes.

Design

- 3.21 The design of the building contains both vertical and horizontal articulation to break up the form and provide a finer grain, responding to the local context. The overall approach is to provide a solid form, reflective of the railway heritage, using predominantly brick facades with complementary use of recesses, detailing and metalwork.
- 3.22 The proposed building will be predominantly constructed using red/buff brick, reflecting the surrounding buildings and the former use of the site associated with the original Twickenham Railway Station. It will also incorporate a mix of high-quality materials, including steel channels, glass, metal infill panels and balustrades.

Amenity Space

- 3.23 All of the proposed apartments will be provided with private balconies, the majority of which meet or exceed the Mayor of London’s Housing SPG standards and LBRuT’s Residential Development Standards. The standards require that the minimum depth and width for all balconies is 1500mm, and that a minimum of 5 sqm of private outdoor space be provided for 1-2 person dwellings plus an extra 1sqm for each additional occupant thereafter.
- 3.24 The design and location of balconies has been considered carefully to avoid any issues of overlooking or privacy and to ensure that residents benefit from natural daylight.
- 3.25 Given the restricted size of the site, there is limited space to provide outdoor amenity space at ground level. Nonetheless, the proposed development incorporates greening of the site where possible as detailed in the landscaping scheme.

Refuse and Recycling Storage

- 3.26 Refuse and recycling storage will be provided at ground floor level within the building in accordance with LBRuT’s Refuse and Recycling Storage Requirements SPD which are set out below. The SPD requires that developments using communal refuse storage containers should provide a storage capacity of 70 litres per bedroom.

Table 3: Recycling Storage Requirements

Number of households served by bin area	Mixed paper, card and carton recycling bins	Mixed container recycling bins	Total recycling bins
3 – 5	1 x 240L	1 x 240L	2 x 240L
7 – 8	1 x 360L	1 x 360L	2 x 360L
9 – 11	2 x 240L	2 x 240L	4 x 240L
12 – 17	2 x 360L	2 x 360L	4 x 360L
18 – 25	1 x 1100L	1 x 1100L	2 x 1100L
26 – 45	2 x 1100L	2 x 1100L	4 x 1100L
46 – 70	3 x 1100L	3 x 1100L	6 x 1100L

- 3.27 The development proposes 46 no. residential units with a total of 54 beds, thereby generating a need to accommodate 6 no. recycling bins with a capacity of 1,100 litres recycling bins.

- 3.28 The amount of refuse storage required totals 3,780 litres which will be provided by 9 no. bins with a storage capacity of 1,100 litres and 2 no. binds with a storage capacity of 240 litres.

Energy and Sustainability

- 3.29 The development is designed as being low carbon using sustainable energy sources in accordance with Local and London Plan requirements.
- 3.30 Heating will be provided by air source heat pumps, four communal condenser units and a community heating plant room. A substation will be provided on the ground floor of the building to help supply the development.
- 3.31 The proposals have been influenced by and assessed using LBRuT's Sustainable Construction Checklist to demonstrate how the development aims to achieve targets for carbon dioxide emissions reduction. The proposals achieve a score of 63 which equates to a rating of A, meaning that the development will make a major contribution towards achieving sustainable development in Richmond.
- 3.32 Full details of the energy strategy can be found within the accompanying Energy and Sustainability Statement.

4.0 Planning Policy

4.1 This section considers the planning policies and legislative framework which together provide the context by which a planning application would be considered. It identifies the national, regional and local policies which are contained within statements of Government policy and the Development Plan for the area, or which may otherwise be material to the consideration of the proposed development.

National Policy

National Planning Policy Framework (2019)

- 4.2 The new National Planning Policy Framework (NPPF) was adopted in February 2019, setting out the Government's planning policies for England and how these are to be applied by Local Authorities.
- 4.3 The NPPF sets out the economic, environmental and social planning objectives for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 4.4 The NPPF introduces a presumption in favour of sustainable development. Paragraph 11 requires Local Authorities to provide for objectively assessed needs for housing and with regard to decision taking on planning applications, development proposals that accord with an up-to-date development plan should be approved without delay. Planning permission should be granted without delay where proposals accord with the development plan.
- 4.5 Paragraph 59 requires a sufficient amount and variety of land to come forward where it is needed to significantly boost the supply of homes. Paragraph 60 requires that strategic policies are informed by a local housing need assessment.
- 4.6 Paragraph 68 places an importance on small and medium sized sites as they can make an important contribution to meeting the housing requirement of an area. Local Authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.
- 4.7 Paragraph 80 places significant weight on the need to support economic growth and productivity.
- 4.8 Paragraph 91 promotes social interaction through mixed use developments and street layouts that allow for easy pedestrian and cycle connections. Paragraph 92 seeks the provision of community facilities, including social, recreational and cultural facilities.
- 4.9 Section 9 promotes sustainable transport, with Paragraph 103 directing development towards accessible areas and Paragraph 104 supports an appropriate mix of uses on site.

- 4.10 Paragraph 108 requires that appropriate opportunities to promote sustainable transport have been taken up and that any impacts on the transport network have been mitigated.
- 4.11 Paragraph 109 states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or impacts on the road network would be severe. Paragraph 110 prioritises pedestrian, cycle and public transport movements ahead of the private car.
- 4.12 Paragraph 117 seeks the effective use of land in meeting the needs for new homes. As much use as possible should be made of brownfield land. This is further emphasised in paragraph 118, which gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. It also supports the development of underutilised land and buildings.
- 4.13 Paragraph 121 states that Local Authorities should take a positive approach to applications for alternative uses of land, including supporting housing on retail and employment land where this does not undermine economic sectors or town centre viability.
- 4.14 Paragraph 123 seeks to avoid homes being built at low densities and encourages development to make optimal use of each site.
- 4.15 Section 12 aims to achieve well-designed places with Paragraph 124 stating that good design is a key aspect of sustainable development.
- 4.16 Paragraph 127 requires development that will add to the overall quality of the area, is visually attractive as a result of good architecture, layout and landscaping, is sympathetic to local character, establishes a strong sense of place and optimises the potential of the site.
- 4.17 Paragraph 131 states that great weight should be given to outstanding or innovative design which helps raise the standard of design in the area and promotes high levels of sustainability.
- 4.18 Paragraph 189 requires a consideration of heritage assets and their settings, with Paragraph 192 stating that Local Authorities should take account of the positive contribution that the conservation of heritage assets can make to sustainable communities, and the desirability of new development making a positive contribution to local character and distinctiveness.

The Development Plan

- 4.19 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, all planning decisions must be made with reference to the statutory Development Plan first, and all decisions must accord with the provisions of the Plan unless other material considerations indicate otherwise.
- 4.20 The statutory Development Plan for the site comprises the London Plan and the London Borough of Richmond upon Thames Local Plan.

London Plan (2016)

- 4.21 Chapter 3 of the London Plan is the key consideration for this proposal at the regional level. The Plan identifies a need for 315 additional dwellings per year within the Borough.
- 4.22 Policy 3.3 seeks to increase housing supply and states that Boroughs should seek additional development capacity through intensification, town centre renewal and mixed-use redevelopment.
- 4.23 Policy 3.4 seeks to optimise housing potential, especially in accessible areas with good public transport links.
- 4.24 Policy 3.5 requires that housing developments are of a high quality and should protect and enhance London's residential environment. Policy 3.8 requires a range of different homes that Londoners can afford.

Draft London Plan (2019)

- 4.25 The Mayor of London is in the process of preparing a new London Plan which is due to be adopted in February or March 2020. As the Plan progresses, the policies will carry increasing weight and as such have been referred to in relation to this planning application.
- 4.26 The Draft Plan removes the residential density guidance, further promotes development by public transport links and significantly increases the Boroughs housing target from 315 to 811 units per year, requiring the local authority to identify a much larger number of sites for residential development.
- 4.27 The key policies within the Draft Plan are set out below.
- 4.28 Policy GG2 seeks to create successful, sustainable mixed-use places that make the best use of land. Sites which are well connected by existing or planned public transport should be prioritised.
- 4.29 Policy GG4 seeks to create a housing market that works better for all Londoners. Those involved in planning and development must ensure that more homes are delivered, support the delivery of 50 percent affordable housing and provide good quality homes that meet high standards of design.
- 4.30 Policy D4 requires housing development to be of high quality design with adequately sized rooms and comfortable and functional layouts. A minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings where there are no higher local standards in the borough development plan documents, and an extra 1 sqm for each additional occupant.

- 4.31 Policy D5 requires at least 10 percent of dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings.'
- 4.32 Policy H1 sets out the ten year targets for net housing completions. The target for LBRuT is the provision of 8,110 new dwellings over the plan period.
- 4.33 Policy H2 states that boroughs should proactively support well-design new homes on small sites (below 0.25 hectares in size). The ten year target for housing on small sites in LBRuT is 6,340 new dwellings over the plan period.
- 4.34 Policy H5 sets a strategic target of 50 percent of all new homes to be genuinely affordable. Policy H7 sets out the following split of affordable products to be applied to residential development:
- A minimum of 30 percent low cost rented homes
 - A minimum of 30 percent intermediate products
 - The remaining 40 percent to be determined by the borough.
- 4.35 Policy H12 requires schemes to provide a range of unit sizes. A higher proportion of one and two bed units are generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.

Richmond Local Plan (2018)

- 4.36 Richmond's Local Plan was adopted on 3 July 2018 replacing the Core Strategy and Development Management Plan. The Plan sets out policies and guidance for development within the borough until 2033. Those policies which we consider pertinent to the proposed development are set out below.
- 4.37 Policy LP 1 'Local Character and Design Quality' requires all development to be of a high architectural and urban design standard. Proposals should demonstrate a thorough understanding of the site and how it relates to its existing context. The following will be considerations when assessing proposals:
1. *"compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;*
 2. *sustainable design and construction, including adaptability, subject to aesthetic considerations;*
 3. *layout, siting and access, including making best use of land;*
 4. *space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;*
 5. *inclusive design, connectivity, permeability (as such gated developments will not be*

- permitted), natural surveillance and orientation; and*
6. *suitability and compatibility of uses, taking account of any potential adverse impacts of the collocation of uses through the layout, design and management of the site."*
- 4.38 Policy LP 2 'Building Heights' requires new buildings to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights, by the following means:
1. *"require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area;*
 2. *preserve and enhance the borough's heritage assets, their significance and their setting;*
 3. *respect the local context, and where possible enhance the character of an area, through appropriate:*
 1. *scale*
 2. *height*
 3. *mass*
 4. *urban pattern*
 5. *development grain*
 6. *materials*
 7. *streetscape*
 8. *Roofscape and*
 9. *wider townscape and landscape;*
 4. *take account of climatic effects, including overshadowing, diversion of wind speeds, heat island and glare;*
 5. *refrain from using height to express and create local landmarks; and*
 6. *require full planning applications for any building that exceeds the prevailing building height within the wider context and setting."*
- 4.39 Policy LP 3 'Designated Heritage Assets' requires development to "*conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough.*" Great weight should be given to the conservation of heritage assets when considering the impact of a proposed development on the significance of the asset.
- 4.40 Policy LP 4 'Non-Designated Heritage Assets' states that the Council "*will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage*

assets, including Buildings of Townscape Merit, memorials, particularly war memorials, and other local historic features."

4.41 Policy LP 8 'Amenity and Living Conditions' requires development to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. The Council will:

1. *"ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development; where existing daylight and sunlight conditions are already substandard, they should be improved where possible;*
2. *ensure balconies do not raise unacceptable overlooking or noise or disturbance to nearby occupiers; height, massing or siting, including through creating a sense of enclosure;*
3. *ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting, including through creating a sense of enclosure;*
4. *ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climatic effects."*

4.42 Policy LP 10 'Local Environmental Impacts, Pollution and Land Contamination' seeks to ensure that the environmental impacts of developments do not cause detrimental effects on the health, safety and amenity of existing and new users or occupiers of the development site or surrounding land. This includes air pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle and land contamination.

Air Quality

4.43 Development should be at least 'Emissions Neutral.' In considering the impact of new developments in areas already subject to poor air quality, the following will be required:

1. *"an air quality impact assessment, including where necessary, modelled data;*
2. *mitigation measures to reduce the development's impact upon air quality, including the type of equipment installed, thermal insulation and ducting abatement technology;*
3. *measures to protect the occupiers of new developments from existing sources;*
4. *strict mitigation for developments to be used by sensitive receptors such as schools, hospitals and care homes in areas of existing poor air quality; this also applies to proposals close to developments used by sensitive receptors."*

Noise and Vibration

4.44 Good acoustic design is encouraged to ensure that occupiers of new and existing noise sensitive buildings are protected. The following will be required, where necessary:

1. *"a noise assessment of any new plant and equipment and its impact upon both receptors and the general background noise levels;*
2. *mitigation measures where noise needs to be controlled and managed;*
3. *time limits and restrictions for activities where noise cannot be sufficiently mitigated;*
4. *promotion of good acoustic design and use of new technologies;*
5. *measures to protect the occupiers of new developments from existing sources."*

Light Pollution

4.45 To ensure that artificial lighting in new developments does not lead to unacceptable impacts, the following will be required where necessary:

1. *"an assessment of any new lighting and its impact upon any receptors;*
2. *mitigation measures, including the type and positioning of light sources;*
3. *promotion of good lighting design and use of new technologies."*

Land Contamination

4.46 Where necessary, remediation of contaminated land should be carried out. Any potential contamination risks must be properly considered and mitigated prior to development taking place.

Construction and Demolition

4.47 Environmental disturbances during construction and demolition should be managed and a Construction Management Statement submitted in support of the following types of development:

1. *"all major developments;*
2. *any basement and subterranean developments;*
3. *developments of sites in confined locations or near sensitive receptors; or*
4. *if substantial demolition/excavation works are proposed."*

4.48 Policy LP 15 'Biodiversity' seeks to protect and enhance the borough's biodiversity and in particular, sites designated for their biodiversity and nature conservation value. Where development would impact on species or habitats, potential harm should:

1. *"firstly be avoided (the applicant has to demonstrate that there is no alternative site with less harmful impacts),*
2. *secondly be adequately mitigated; or*
3. *as a last resort, appropriately compensated for."*

4.49 Policy LP 16 'Trees, Woodlands and Landscape' requires *"the protection of existing trees and provision of new trees, shrubs and other vegetation of landscape significance that complement*

existing, or create new, high quality green areas, which delivery amenity and biodiversity benefits."

4.50 Policy LP 17 'Green Roofs and Walls' aims for the incorporation of green roofs and/or brown roofs into "*new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact.*" At least 70% of any potential roof plate should be used as a green/brown roof. It is the responsibility of the applicant to provide evidence and justification if a green roof cannot be incorporated. The Council will expect a green wall if a green/brown roof is not feasible.

4.51 Policy LP 20 'Climate Change Adaption' promotes and encourages development "*to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property.*

New development, in their layout, design, construction, materials, landscaping and operation, should minimise the effects of overheating as well as minimise energy consumption in accordance with the following cooling hierarchy:

1. *minimise internal heat generation through energy efficient design*
2. *reduce the amount of heat entering a building in summer through shading, reducing solar reflectance, fenestration, insulation and green roofs and walls*
3. *manage the heat within the building through exposed internal thermal mass and high ceilings*
4. *passive ventilation*
5. *mechanical ventilation*
6. *active cooling systems (ensuring they are the lowest carbon options)."*

4.52 Policy LP 21 'Flood Risk and Sustainable Drainage' states that "*all developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere.*"

4.53 Policy LP 22 'Sustainable Design and Construction' requires developments to "*achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change.*

All new major residential developments (10 units or more) should achieve zero carbon standards in line with London Plan policy."

4.54 Policy LP 23 'Water Resources and Infrastructure' states that "*the borough's water resources and supplies will be protected by resisting development proposals that would pose an unacceptable threat to the borough's rivers, surface water and groundwater quantity and quality.*

New major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development."

- 4.55 Policy LP 24 'Waste Management' requires that *"waste is managed in accordance with the waste hierarchy, which is to reduce, reuse or recycle waste as close as possible to where it is produced.*
1. *All developments, including conversions and changes of use are required to provide adequate refuse and recycling storage space and facilities, which allows for ease of collection and which residents and occupiers can easily access, in line with the guidance and advice set out in the Council's SPD on Refuse and Recycling Storage Requirements.*
 2. *All developments need to ensure that the management of waste, including the location and design of refuse and recycling facilities, is sensitively integrated within the overall design of the scheme, in accordance with policies on Local Character and Design.*
 3. *Development proposals, where appropriate, should make use of the rail and the waterway network for the transportation of construction, demolition and other waste. Development proposals in close proximity to the river should utilise the river for the transport of construction materials and waste where practicable.*
 4. *All major developments, and where appropriate developments that are likely to generate large amounts of waste, are required to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials."*
- 4.56 Policy LP 25 'Development in Centres' states that *"development in the borough's centres will be acceptable if it is in keeping with the centre's role and function within the hierarchy and is of a scale appropriate to the size of the centre. "*
- 4.57 Policy LP 27 'Local shops and services' seeks to ensure that residents have shops and services within reasonable walking distance (400 metres).
- 4.58 Policy LP 28 'Social and Community Infrastructure' aims to ensure that there is *"adequate provision of community services and facilities, especially in areas where there is an identified need or shortage."*
- 4.59 Policy LP 29 'Education and Training' states that *"the Council will work with partners to encourage the provision of facilities and services for education and training of all age groups to help reduce inequalities and support the local economy.*

The Council will promote local employment opportunities and training programmes. Where the employment opportunities generated by construction as well as the end use of the development create more than 20 (Full Time Equivalent) jobs, a Local Employment Agreement, secured through a Section 106 agreement, will be required."

- 4.60 Policy LP 30 'Health and Wellbeing' "*promotes and supports healthy and active lifestyles and measure to reduce health inequalities.*

The Council will support development that results in a pattern of land uses and facilities that encourage:

- 1. Sustainable modes of travel such as safe cycling routes, attractive walking routes and easy access to public transport to reduce car dependency.*
- 2. Access to green infrastructure, including river corridors, local open spaces as well as leisure, recreation and play facilities to encourage physical activity.*
- 3. Access to local community facilities, services and shops which encourage opportunities for social interaction and active living, as well as contributing to dementia-friendly environments.*
- 4. Access to local healthy food, for example, allotments and food growing spaces.*
- 5. Access to toilet facilities which are open to all in major developments where appropriate (linked to the Council's Community Toilet Scheme).*
- 6. An inclusive development layout and public realm that considers the needs of all, including the older population and disabled people.*
- 7. Active Design which encourages wellbeing and greater physical movement as part of everyday routines.*

A Health Impact Assessment must be submitted with all major development proposals."

- 4.61 Policy LP 31 'Public Open Space, Play Space, Sport and Recreation' states that "*public open space, children's and young people's play facilities as well as formal and informal sports grounds and playing fields will be protected, and where possible enhanced.*

The Council will require all major development proposals in the borough to meet the Public Open Space, play space, and playing fields and ancillary sport facilities needs arising out of the development by requiring the following:

- 1. **Public Open Space:** applicants should provide an analysis of existing open space provision in line with the Council's accessibility standards for travel to open spaces. Where there is inadequate existing provision and limited access to such facilities, publicly accessible facilities will be expected on site to mitigate the impacts of the new development on existing provision.*
- 2. **Play space:** applicants should provide a play and child occupancy assessment to determine whether the proposal will lead to an estimated child occupancy of ten children or more, by using the Council's child yield calculator as set out in the Planning Obligations SPD. In addition, an assessment of existing play facilities within the surrounding area will be required. Where the assessment demonstrates an estimated child occupancy of ten children or more, the development proposal should make appropriate and adequate*

provision of dedicated on-site play space by following the London Plan benchmark standard of 10sqm per child. The Council will seek to integrate new major development within existing village areas and neighbourhoods. Therefore, new dedicated on-site play space should be made publicly accessible.

3. **Playing fields and sport facilities:** *applicants should assess the need and feasibility for on-site provision of new playing fields and ancillary sport facilities in line with the borough's Playing Pitch Strategy.*
4. *Where on-site provision of Public Open Space, play space or new playing fields and ancillary facilities is not feasible or practicable, the Council will expect existing surrounding facilities and spaces to be improved and made more accessible to the users and occupiers of the new development through, for example, improved walking and cycling links or enhancements of play space or existing playing fields and associated sport facilities. Financial contributions will be required to either fund off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development."*

4.62 Policy LP 34 'New Housing' sets out the borough's housing target of 3,150 new homes for the period from 2015 to 2025. In Twickenham, the indicative amount of housing required to 2025 is 1000-1050 units.

4.63 Policy LP 35 'Housing Mix and Standards' states that "*development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the site-specifics of the location.*

All new housing development, including conversions, are required to comply with the Nationally Described Space Standard.

All new housing development, including conversions, should provide adequate external space. Purpose built, well designed and positioned balconies or terraces are encouraged where new residential units are on upper floors, if they comply with policy LP8 Amenity and Living Conditions. Regard should be had to the Council's Residential Development Standards SPD as appropriate.

Amenity space for all new dwellings, including conversions, should be:

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

and easy access to adequate private amenity space.

90% of all new build housing is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% of all new build housing is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings'."

- 4.64 Policy LP 36 'Affordable Housing' requires 50% of all housing units to be affordable comprising a tenure mix of 40% for rent and 10% intermediate housing.

"Where a reduction to an affordable housing contribution is sought on economic viability grounds, developers should provide a development appraisal to demonstrate that schemes are maximising affordable housing. The developer will be required to underwrite the costs of a Council commissioned economic viability assessment."

- 4.65 Policy LP 39 'Infill, Backland and Backgarden Development' states that all *"infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours."*

- 4.66 Policy LP 40 'Employment and local economy' states that *"the Council will support a diverse and strong local economy in line with the following principles:*

- 1. Land in employment use should be retained in employment use for business, industrial or storage purposes.*
- 2. Major new employment development should be directed towards Richmond and Twickenham centres. Other employment floorspace of an appropriate scale may be located elsewhere.*
- 3. The provision of small units, affordable units and flexible workspace such as co-working space is encouraged.*
- 4. In exceptional circumstances, mixed use development proposals which come forward for specific employment sites should retain, and where possible enhance, the level of existing employment floorspace. The inclusion of residential use within mixed use schemes will not be appropriate where it would adversely impact on the continued operation of other established employment uses within that site or on neighbouring sites."*

- 4.67 Policy LP 41 'Offices' states that *"the Council will support a strong local economy and ensure there is a range of office premises within the borough, particularly for small and medium size business activities within the borough's centres, to allow businesses to grow and thrive."*

- 4.68 Policy LP 44 'Sustainable Travel Choices' aims to *"promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment."*

4.69 Policy LP 45 'Parking Standards and Servicing' requires "*new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment, and ensuring making the best use of land.*

Car free housing developments may be appropriate in locations with high public transport accessibility, such as areas with a PTAL of 5 or 6, subject to:

- a. the provision of disabled parking;*
- b. appropriate servicing arrangements; and*
- c. demonstrating that proper controls can be put in place to ensure that the proposal will not contribute to on-street parking stress in the locality.*

All proposals for car free housing will need to be supported by the submission of a Travel Plan."

Twickenham Area Action Plan (2013)

4.70 The Twickenham Area Action Plan (AAP) provides the framework for development and change in the town centre over a period of 15 years. It sets out the proposals for several key sites in the town, improvements to the public realm, a reduction in traffic impacts and environmental improvements.

4.71 Policy TWP SD 1 'Presumption in favour of sustainable development' states that "*the Council will take a positive approach that has regard to the presumption in favour of sustainable development contained in the National Planning Policy Framework.*

Planning applications that accord with the policies in this Action Area Plan, the Core Strategy and, where relevant, with other adopted Development Plan Documents, will be approved without delay, unless material considerations indicate otherwise."

4.72 Principles 1 'Transport' seeks to ensure that motor vehicles can access the centre conveniently whilst reducing their dominance in favour of pedestrians.

4.73 Principles 2 'Parking' calls for the redevelopment of Station Yard to include public car parking if required. New development should provide sufficient parking to avoid adverse impacts on on-street parking.

4.74 Principles 4 'Environmental Improvements' seeks to ensure that all new developments and environmental and transport improvements are designed to be sustainable.

Proposal Site TW 2 Station Yard

4.75 Subject to adequate re-provision of the bus stands, to redevelop the site with a residential scheme up to 3-4 storeys from ground level. Part of the site to be developed as a public car park provided it is required to replace other parking lost from the town centre. Buildings should

be of appropriate height and should integrate well with the surrounding residential area and enhance the setting of the Albany PH, with improved public realm and landscaping.

Design Guidance

- Height/massing should form an intermediary between that of Bridge House and surrounding development;
- Maximum height of 3-4 storeys from ground floor level to ensure development is compatible in scale to the surrounding residential area, including the Queens Road conservation area;
- Designed to integrate well with the surrounding residential area including the Queens Road conservation area;
- Excellent design to provide a positive frontage towards the Albany Public House (a Building of Townscape Merit) and its setting;
- The opportunity should be taken to provide a small area of landscaped space to improve the area closest to the Albany PH; Relocation of bus stands;
- High quality tree planting and other landscaping to improve the quality of the environment;
- Public car parking will only be provided to replace any parking lost to the town centre as a result of regeneration; and will be subject to a traffic assessment.

Twickenham Station and Surroundings Design Standards Supplementary Planning Document (2010)

4.76 Area 3 - Station Yard (T23 in saved UDP)

- Scale/ massing should form an intermediary between that of Bridge House and surrounding development, 3-4 storeys to avoid adverse impact on residential area.
- Provide a positive frontage towards The Albany (Building of Townscape Merit)
- Include tree planting on the railway side to screen new development and add to landscaping in otherwise built area

5.0 Pre-Application Consultation

First Pre-Application Submission

- 5.1 Pre-application advice was sought from LBRuT Council in November 2018 to confirm whether the principle of the proposed development was considered acceptable and to obtain the Council's feedback on the scheme. The proposal was for a 7 storey residential building with commercial space at ground floor. Following a site visit and meeting held in December 2018, the Council issued a written response on 15 February 2019, a summary of which is set out below.

"The principle of development is considered acceptable, particularly given that the site is allocated for residential development and public car parking, the latter of which should only be provided if parking is lost elsewhere within Twickenham Town Centre. It does not appear that there has been any loss of parking, and therefore the need for additional provision should be reconsidered. "

- 5.2 The proposed residential use of the site *"would further add to the vitality and viability of the town centre and contribute towards the borough's housing targets"*.
- 5.3 The first pre-application scheme included possible commercial units at ground floor level due to uncertainty at the time over the need for access to below ground services and the consequent impact this had on usable space. The pre-application advice supported the possible introduction of such commercial uses, notwithstanding the residential allocation of the site.
- 5.4 The requirement for 50% affordable housing is set out within the pre-application advice, as per regional and local policy. The Council highlighted that affordable housing must form an integral part of the proposals from an early stage. The process of informing provision of affordable housing through a viability appraisal after the scale and nature of the proposals is developed was not considered to be appropriate or acceptable.
- 5.5 The target unit mix of 60% 1-bed units and 40% 2-bed units is considered appropriate given the site's location within Twickenham Town Centre. An even higher proportion of studio and 1-bed units was encouraged.
- 5.6 Amenity space should be provided at a rate of 5 sqm per flat plus an additional 1 sqm per additional occupant. Amenity space should be private, usable, functional, safe, easily accessible and oriented to respond to the need for sunlight and shading.
- 5.7 Play space provision should be determined using the GLA population yield calculator.
- 5.8 It was recommended that the overall height of the building is reduced to no more than 4 storeys and noted that justification would be required to demonstrate that a proposal for a 7-storey building would respect the local context. It recommended that consideration should

be given to incorporation of setbacks at upper levels, or obvious differentiations to the façade treatment at each level.

- 5.9 Concern was expressed at proposed undercroft parking and it was noted that possible introduction of commercial space would help to ensure a positive frontage at ground level.
- 5.10 The use of brickwork was supported in the pre-application advice letter and it was recommended that the Design and Access Statement should set out justification for the proposed materials.
- 5.11 It was advised that a full townscape analysis and Design Statement should be provided which assess the acceptability of the proposals for the site and wider area. Whilst key views were provided at pre-application stage, these should be further developed with the final design and rendered buildings incorporated. It was recommended that a view to the east of the site is included.
- 5.12 It was recommended that a brief Heritage Statement be provided to demonstrate how the proposals protect and enhance the setting of designated and non-designated heritage assets including views, gaps, vistas and any other features identified in the relevant Conservation Area Statements.
- 5.13 The pre-application advice set out that any planning application must demonstrate that the proposals are acceptable in relation to nearby residential properties, particularly those along Railway Approach and Grosvenor Road. The design and siting of windows, balconies, external terraces and external lighting should be informed by these and other nearby residential areas.
- 5.14 In addition to a Sunlight and Daylight Assessment, it was recommended that special consideration be given to solar glare.
- 5.15 Given the sustainable location of the site, it advised that car-free development would be supported. It should be demonstrated, however, that suitable facilities exist for servicing and disabled parking. It noted that the proposed car parking unrelated to the development would not be accepted and that cycle parking should be provided in accordance with London Plan standards.
- 5.16 Policies LP 20 and LP 22 requires 'zero carbon' standards for major residential and mixed-use schemes. At least 35% of regulated CO2 emission reductions must be achieved on-site. It was also advised that green/brown roofs and sustainable drainage systems should also be incorporated.
- 5.17 The pre-application advice also outlined that given that the site is surrounded by noise generating uses, consideration must be given to the acoustic design of buildings to protect future occupants from existing noise and vibration sources.

5.18 In terms of nature conservation, although the site is completely covered in hardstanding, the Council will require the development to provide net ecological gains. Development should create new habitats and biodiversity features and a comprehensive tree planting scheme should be considered.

Second Pre-Application Submission

5.19 A second pre-application submission was made in May 2019 which responded positively to these comments and proposed a 5-6 storey building that was residential in nature and reflected much of the form and massing of the current application proposals. The pre-application comments received at that submission are summarised below.

5.20 The principle and form of the overall development was supported and reflected the earlier pre-application comments.

5.21 It was recommended that the scheme was presented to the Design Review Panel (DRP) to address the design comments set out in the conservation officers comments (below).

5.22 The overall principles of the development were again supported. There was some concern over the scale and massing and it was recommended that a building of 5 storeys could be acceptable and that the top floor should be stepped back to give a strong shoulder level. The building should step down from Bridge house and form a mediating element to the smaller scale of the buildings to the west. The façade should be refined and detailed to help break down the overall massing and help the building relate to the railway heritage. The use of brick was supported.

5.23 It was noted that in order for the overall scale and form to be accepted the key issue to demonstrate is that the proposal mends the urban fabric by framing the street frontage and presents a good quality design that is accompanied by strong public realm works to enhance the street scene. This should if possible, include engagement with TfL to see if this area can be enhanced for public benefit, but should work with the public realm around the area.

5.24 The scale of development also needs to be justified with reference to the planning balance and the level of affordable housing together with the public realm enhancements and other planning benefits. The step down and set back were helpful in providing variation in height and stepping down from Bridge House towards the Albany.

5.25 The elevations need further working up and materials and interest added. The top floor needs different materials treatment to contrast. The form needs to be more detailed. The windows and entrances to the street need to provide engagement and passive surveillance and be secure by design compatible.

- 5.26 It was agreed that public consultation was a positive step as well as engagement with ward councillors.
- 5.27 In relation to the elevation treatment, further work on the top floor was recommended to reduce its apparent height and remove tall glazing. The façade treatment was recommended to use brick and use materials to visually reduce the overall scale - possibly by using a contrasting finish towards the top. It was noted that the replacement of parking at ground floor level is beneficial and will help to provide an active frontage.

Design Review Panel

- 5.28 Following on from this advice, the scheme was further developed with additional detailing added to the building and materials, and inclusion of a recessed top floor. This was then presented to the Design Review Panel in July 2019.
- 5.29 The overall scheme was supported by the DRP, who supported the approach to the siting, form and overall scale and massing.
- 5.30 The DRP also supported the use of brick and the detailing of the development, and the mix of brick and metal as the principle materials, echoing the references to railway heritage.
- 5.31 The DRP recommended additional improvements be made to provide level threshold access to the ground floor apartments and to consider the introduction of rooftop amenity space if this was feasible.
- 5.32 Following on from the DRP comments, the scheme was further revised to provide full level access to the ground floor, so the scheme is fully wheelchair accessible. Although a rooftop amenity space was considered, it was clear that this would be limited in size and would require a taller building due to the need for balustrades and lift access. Given these factors and the need to provide enhanced ecological provision, the decision was made to retain the reduced height of the building and provide a sedum roof which has both sustainable urban drainage and nature conservation advantages.
- 5.33 The brickwork was further worked up with reference to the detailing and panels used in the older railway buildings. The building was also developed to achieve an overall A sustainability rating based on LBRuT guidance and hence makes a substantial contribution to sustainable development in the Borough.
- 5.34 In all other respects the scheme accords with the DRP recommendations.

Public Consultation

- 5.35 The scheme proposals were also the subject to stakeholder engagement and public consultation which is summarized in the Statement of Community Involvement (SCI) which is submitted as part of the application documents. The comments made in this process were input to the

design team and where appropriate are reflected in the application and the Design and Access Statement.

6.0 Planning Assessment

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, if regard is to be had to the Development Plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the Plan, unless material considerations indicate otherwise.
- 6.2 In this case, the site is allocated for residential development in the development plan and the principle of development therefore, accords with the relevant policies of the development plan, subject to consideration of the details of the development. As a result of the detailed assessment set out in the supporting technical and environmental reports and the pre-application and DRP process, it is also concluded that the application proposals accord with the detailed policies of the development plan and benefit from the presumption in favour of development being permitted. The key basis for this is set out in the following section.
- 6.3 The proposed development represents a high quality built form and a significant improvement to this highly accessible site, providing much needed residential accommodation in a sustainable location and in an area characterized by a mix of high density residential and commercial buildings. The application proposals complement the existing cluster of buildings within the vicinity of London Road and mediate the change in scale with the reduced scale of development to the south and west.
- 6.4 This section considers the proposals against national, regional and local planning policy context which are summarised under the following headings:
- Principle of Development;
 - Design and Layout;
 - Heritage and Archaeology;
 - Access, Highways and Parking;
 - Daylight and Sunlight;
 - Energy and Sustainability;
 - Noise and Vibration;
 - Air Quality;
 - Landscaping and Private Amenity Space;
 - Refuse and Recycling;
 - Drainage;
 - Community Involvement;
 - Affordable Housing.

Principle of Development

- 6.5 The site lies within an accessible urban area and is not subject to any environmental or other designations that would restrict the principle of its redevelopment. It represents an underused, brownfield site that can contribute to regeneration and meeting key planning policy objectives.
- 6.6 The site is within the town centre of Twickenham which is one of the two principal locations for growth in the Local Plan (2018) spatial strategy and a location where the majority of higher density housing will be targeted. The site itself is also allocated for development in the Action Area Plan (2013). The principle of development is, therefore, supported by the Richmond Local Plan, the London Plan and NPPF.
- 6.7 There is also an expectation under the London Plan that development on such brownfield sites within town centres and within areas of good transport accessibility, that development densities will be optimised in order to achieve sustainable development and maximise their contribution to housing supply within London.
- 6.8 Paragraph 3.1.37 of the Local Plan makes clear that Twickenham as a centre, with its accessible locations and established range of services is, alongside Richmond, the most sustainable option for development in the Borough. It supports major developments and notes that there is some potential for 'tall' buildings and higher densities close to Twickenham train station.
- 6.9 It goes on to note that increased densities of housing, including some 'taller' buildings, as well as the provision of smaller residential dwelling sizes, are appropriate in these centres, to an extent that is compatible with the established character and environmental and heritage constraints.
- 6.10 There is clearly therefore, a realisation that the centre of Twickenham should wherever possible, accommodate higher density housing development to fulfil the spatial and quantitative requirements of the Plan.
- 6.11 Paragraph 3.1.28 of the Local Plan also notes the housing target of 315 dwellings per annum to be provided for the period of 2015-2025 will be expected to be exceeded by the Mayor. The Local Plan spatial strategy seeks to do so by optimising the use of sites, particularly in centres with good public transport accessibility and mixed-use redevelopments.
- 6.12 As highlighted in the previous section, the Council confirmed within their pre-application response that the principle of development is considered acceptable and *"would further add to the vitality and viability of the town centre and contribute towards the borough's housing targets"*.

Design and Layout

- 6.13 The proposed design and layout, as set out in the accompanying Design and Access Statement, have adopted a form that reflects the location of the site and its relationship with the surrounding built form. The proposals have had regard to Policy LP2 in relation to building heights and are based on an assessment of prevailing character, which in this case spans the taller, larger footprints of the buildings fronting London Road and the smaller scale 3 storey residential properties to the south and west. The site's context is, in large part, determined by Bridge House, The Exchange and the emerging buildings at Twickenham Station. The application proposals will help address the void in the London Road frontage that is formed by the current site and adjoining railway.
- 6.14 The site also has to relate well to the residential apartment buildings and homes to the south and west, fronting Station Approach, Station Yard and Queens Road, where the majority of buildings are 3-storey pitched roof design. It therefore forms an intermediary role that provides for a stepping down towards the western end of the site and includes a recessed top floor, recessed balcony forms and brick detailing on the facades to help achieve this.
- 6.15 While the Twickenham AAP suggests a height range of 3-4 storeys above ground floor level to relate well to the surrounding residential area to the west and Bridge House to the east, the design development through the pre-application and DRP process has helped to develop the scale, massing and design rationale and endorse the approach now set out in this application. The pre-application process and DRP have agreed that the 5/6 storey building as proposed is therefore, acceptable on the site.
- 6.16 Paragraph 4.2.2 of the Local Plan notes that Twickenham Town Centre and the area around the station is appropriate for such buildings, while respecting local character. The building will step down from Bridge House and in adopting a parapet height at 5 storeys and recessed top floor, helps mediate between this the larger buildings to the east and lower-rise residential buildings and the Albany to the south and west.
- 6.17 There is good space around the building, fronting the western end of Mary's Terrace, Station Yard and the TfL land which also helps mediate between the heights of the surrounding buildings and allows for additional landscaping. The height and massing of the building proposed will therefore, respect the neighbouring properties and also allow for the most efficient use of currently underutilised land.
- 6.18 The design of the building contains both vertical and horizontal articulation to break up the form and provide a finer grain, responding to the local context. The overall approach is to provide a solid form, reflective of the railway heritage, using predominantly brick facades with complementary use of recesses, detailing and metalwork.

6.19 The proposed building will be predominantly constructed using red/buff brick, reflecting the surrounding buildings and the former use of the site associated with the original Twickenham Railway Station. It will also incorporate a mix of high quality materials, including steel channels, glass, metal infill panels and balustrades.

Heritage and Archaeology

6.20 The accompanying Heritage Statement and Townscape and Visual Impact Assessment have considered the proposed development in relation to statutory and locally designated heritage assets.

6.21 There are no heritage assets within the site, however Queen's Road Conservation Area is some 50m to the west which includes the locally listed Albany Pub. The site is also in close proximity to Amyand Park Road Conservation Area, Cole Park Road Conservation Area and Twickenham Riverside Conservation Area, but is not visible from any of these areas and thus will not have any impact on their character or setting.

6.22 The majority of the Queen's Road Conservation Area extends towards the south and is enclosed by small residential streets, thereby largely obscuring views of the site from within this area. In this regard, the proposed development is not likely to affect the character or setting of the Conservation Area which is generally contained. The Albany Pub directly faces the application site and therefore careful consideration has been given to its context and setting.

6.23 The proposals will maintain the setting of the Albany, particularly given the large separation distance between its frontage and the application site. The proposed building has been set back and angled from the street, thereby maximising the view towards the Albany. This will ensure that the pub remains visible from London Road and Station Approach as shown in the image below.

6.24 The development will also provide continuity of hard and soft landscaping to the west and around the site, softening the view of the building for patrons of the pub. This coincides with the LBRuT public realm works proposed outside of the pub, which are part of the realignment of the Station Road and Station Yard junction, further complementing and enhancing its setting.

6.25 Overall, the proposed development is not considered to have any significant impact on any statutory or locally designated heritage assets. Indeed, in helping to frame the street and mend the current gap in the townscape, with a building of an appropriate form and materials, the development enhances the setting of the northern part of the Conservation Area and the Albany.

6.26 The site does not lie in an Archaeological Priority Area and is located outside of the core of historic Twickenham. The potential for any early prehistoric and post-Roman archaeology is considered very low, as set out in the detailed assessment.

- 6.27 A possible Roman farmstead was found 300m east of the site though any archaeological potential from this period is considered to be low-moderate.
- 6.28 The Heritage Statement suggests that 3 trenches may be required to check for in situ archaeology, however given the lack of archaeological potential, these works can be secured by condition.

Figure 3: Views towards the Albany Pub



Source: Wimshurst Pelleriti (2019)

Access, Highways and Parking

- 6.29 A Transport Statement has been provided by Mayer Brown in support of the application to assess the implications of the scheme in terms of highways and parking.
- 6.30 The site is located in a highly accessible location with a PTAL rating of 4 – 5. There are good connections to public transport links with bus stops approximately 180m from the application site and Twickenham Railway Station approximately 200m to the northwest.
- 6.31 The proposed development is car-free, with the exception of 2 no. disabled bays. A total of 55 no. cycle parking spaces will be provided, including 1 short stay space, in accordance with the London Plan cycle parking requirements. Cycle storage will be secure and covered, located at ground floor level and accessed via the rear of the building adjacent to the railway line.
- 6.32 Given that the site is currently used as a car park and the proposals include the provision of two disabled bays only, there will be a reduction in vehicle movements to and from the site.

Overall it is expected that there will no vehicle trips associated with the future use of the development.

- 6.33 The Transport Statement notes that there will be an estimated 104 residents living at the development. In terms of public transport, Census Data indicates that this would result in an additional 2 persons per train and less than one additional person per bus during peak periods. In terms of walking and cycling, the development would result in an additional 0.4 pedestrians and cyclists per minute on surrounding streets during peak periods.
- 6.34 The report concludes that there will be no impact on existing transport, pedestrian and cycle networks, and the development will result in an overall reduction in vehicle movements in the vicinity of the site. Consequently, the proposals are considered to be in accordance with national, regional and local planning policies, in particular Policies LP 44 and LP 45 of the Richmond Local Plan (2018).

Daylight and Sunlight

- 6.35 A Daylight and Sunlight Assessment has been provided by Paragon in support of the planning application, which assesses both the internal lighting conditions of the proposed building and the potential impact of the building on the lighting conditions of adjacent occupiers.
- 6.36 The assessment has been carried out in accordance with the recommendations in BRE Report 209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (Second Edition, 2011). The development was concluded to offer good levels of sunlight and daylight and accord with BRE guidance.
- 6.37 All proposed habitable rooms were assessed in terms of internal daylight and sunlight amenity. Out of a total of 84 rooms assessed, 73 met or exceeded the target Average Daylight Factor (ADF) values. All of the rooms assessed meet or exceed the NSL criteria in that more than 80% of the room area on the working plane will receive direct light from the sky.
- 6.38 The rooms that did not meet ADF targets are a result of windows located below balconies, thus reducing daylight availability. The report highlights that *"this is a recognised reason not to meet an ADF target due to the fact that the provision of private external amenity space is traded for interior daylight"* and *"87% of rooms meeting the targets is commensurate with apartment buildings within urban locations."*
- 6.39 Residential properties surrounding the site were also assessed in terms of the impacts of the proposed building on existing levels of daylight and sunlight and included:
- 2 Grosvenor Road;
 - 2 and 4 Station Yard;
 - 1 Queen's Road (The Albany Public House); and

- 1 and 2 Brewery Lane.
- 6.40 In respect of 2 Grosvenor Road, the analysis found that all windows would retain more than 0.84 times the former VSC value, whilst all rooms would retain more than 0.97 times the former NSL value. The results are compliant with the BRE Guide.
- 6.41 Analysis of all other properties indicated that the VSC, NSL and APSH are fully adherent with the BRE Guide and therefore there will be no material harm to amenity once the development is completed.
- 6.42 Overall, the report concludes that there will be no harm to the existing residential properties surround the site, and that the amenity for future occupiers of the proposed development is deemed acceptable.
- 6.43 A Solar Glare assessment was also undertaken to understand the potential impact to the Railway signal to the west of the development and determine whether the development could cause reflected solar glare or dazzle from the glazed or reflective facades. The assessment was carried out in relation to the set of railway signals located approximately 170m to the west of the site with testing points taken 60m and 120m back from the signal.
- 6.44 The assessment demonstrated that the building will be visible by drivers and has some potential to cause glare. However, given that the elevation is not fully glazed that the glare from 60m away will be mainly outside peripheral vision, and that from further away the building appears smaller and hence the area of glare smaller, the overall impact would be minor for a driver travelling east into Twickenham Station. It concluded that no mitigation measures are required.

Energy and Sustainability

- 6.45 An Energy and Sustainability Statement has been provided by Integration which follows the Mayor's 'Be Lean, Be Clean, Be Green' methodology.
- 6.46 'Be Lean' refers to passive measures in the building fabric which can reduce energy use such as the walls, windows, doors and other building components. In terms of the proposals, the building fabric has been specified to meet or exceed the minimum fabric parameters outlined in Part L of the Building Regulations 2013, as set out within the Energy and Sustainability Statement and are shown to achieve a 9.9% reduction in CO2 emissions compared to the Regulations.
- 6.47 'Be Clean' refers to the potential to connect to any local decentralized heating (DH) networks. The closest existing or potential heat networks are located away from the proposal site and therefore connection to third party heat networks is not viable for the development. A central system has been proposed however which could connect to a more efficient heat network should one arise in the future.

- 6.48 'Be Green' refers to the provision of renewable and low carbon technologies. In terms of the 'Be Green' measures to be incorporated within the development, it is proposed to provide Air Source Heat Pumps for space heating and hot water. This was considered to be the most viable option following a renewable energy feasibility exercise and results in 40.4% reduction of carbon dioxide emissions compared to Building Regulations 2013.
- 6.49 The report concludes that "*overall, using the Richmond Sustainable Construction Checklist, the scheme scores A as demonstrated in the supplementary checklist document*". This indicates that the project "*makes a major contribution towards achieving sustainable development in Richmond*".
- 6.50 It is therefore, considered to be both sustainable and policy compliant and a low carbon development.

Noise and Vibration

- 6.51 A Noise and Vibration Assessment has been provided by Cole Jarman which quantifies the existing noise climate on-site and impacts of vibration from the railway line, as well as providing a noise intrusion assessment for the proposed development.
- 6.52 Two attended noise surveys were carried out at the site to establish the existing noise climate with measurements taken from positions on the northern and southern site boundaries. The locations were selected to determine noise levels from the railway line on the proposed northern façade, as well as representative noise levels from Station Road along the southern boundary of the site.
- 6.53 The background noise at the site was found to primarily be from traffic along London Road, with elevated noise levels during periods of vehicular activity along Station Yard and Railway Approach. Significantly elevated noise levels were noted when trains passed on the site's northern boundary, with some trains sounding their horns during the daytime. Minor noise levels were also noted from high aircraft flyovers and pedestrian activity from Twickenham Station.
- 6.54 High performance glazing is required for all windows and balcony doors in order to control external noise intrusion. The assessment found that internal noise levels will be suitable with windows closed, however ventilation should be carefully considered. It is therefore proposed to incorporate Mechanical Ventilation and Heat Recovery units to provide background noise ventilation to flats on the northern, western and eastern facades. Ventilation systems should have a user operated 'boost' setting to increase ventilation rates to provide Mechanical Ventilative Cooling.
- 6.55 To further reduce noise levels, it is also recommended to use solid parapets/balustrades to balcony fronts.

- 6.56 With the aforementioned ventilation and glazing recommendations, it is concluded that the internal noise criteria will be protected to provide suitable levels of amenity to future occupiers of the development.
- 6.57 Vibration measurements were taken from a single location using a real-time analyser. The passing of trains was manually compared to the expected station schedule and noted when present at the time of survey. Numerous passenger trains, as well as two freight trains, passed the site during the assessment.
- 6.58 The vibration levels recorded were compared with the criteria in BS6472 and it was determined that the worst-case vertical vibration experienced on site would not be expected to reach even the range of 'low probability of adverse comment.'
- 6.59 Consequently, vibration is not considered to be an obstacle in respect of the development and the development proposed is acceptable and policy compliant.

Air Quality

- 6.60 An Air Quality Assessment (AQA) has been provided by WYG in support of the proposals to assess the potential air quality impacts during the construction and operational phases of the development.
- 6.61 The proposal site is located within the Richmond Air Quality Management Area (AQMA) which covers the entire borough due to concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀). The AQA highlights that baseline levels of NO₂ in the study area and at the development site were below the Air Quality Objective (AQO) and as such, it is expected that future residents will not experience NO₂ above the AQO.
- 6.62 During construction, the main emissions are likely to be dust and particulate matter generated during earth moving or from construction materials. The AQA sets out a number of mitigation measures to be implemented in order to ensure that any impacts on air quality are minimised. Following implementation of these measures, the effects from the construction phase are not anticipated to be significant.
- 6.63 The report highlights that the proposed development will be heated through air source heat pumps and consequently there will be no building emissions associated with the proposals. Furthermore, as the proposed development is car-free, with only disabled car parking, there will be no material traffic generated as a result of the development.
- 6.64 The development is therefore considered to be 'Air Quality Neutral' and no further mitigation is required.

Landscaping and Private Amenity Space

- 6.65 The site is currently dominated by hardstanding, generally comprising of asphalt. The proposed development incorporates a number of improvements through the landscaping strategy which includes hard and soft landscape features.
- 6.66 The aim of the landscape proposals set out are to unit the materials and planning around the site with high quality public realm that helps to enhance the overall character and appearance of Station Yard. While the adjoining TfL bus stand remains an operational requirement, the proposals help frame this as far as is possible within the public realm and on the application site to ensure that the wider environment is enhanced.
- 6.67 Landscaping where possible uses climate resilient planting and native species that has the added benefit of offering ecological enhancement.
- 6.68 In terms of hard landscaping, it is proposed to resurface the pavement at the front of the development with concrete flags from Mary's Terrace to the footpath in front of the Albany Public House. This will ensure consistent surfacing surrounding the new building.
- 6.69 The section of carriageway directly in front of the Albany and the adjacent TfL carpark will be resurfaced with HRA. The new surfacing will match the uplift of the surrounding area, and improve the appearance and functionality of the space.
- 6.70 The new building entrance on Station Yard will be highlighted by a 'doormat' of granite setts to provide legibility and differentiate from the main street footpath palette.
- 6.71 All areas will be designed to ensure that the development is accessible by all. All routes will be free of obstacles and appropriate textural and colour contrast will be provided at footpaths and road junctions.
- 6.72 In terms of soft landscaping, it is proposed to provide tree planting with ornamental shrub and herbaceous planting to ensure that the site has a significantly improved soft landscape character. Street trees will be selected based on their ability to provide seasonal variation, greenery, visual interest and character. Planting at the base of the building will create a soft buffer from the public domain to the ground floor units. Species will be selected which are low to medium sized plants in order to maintain good visibility and remove potential hiding places. Taller plants are to be located against the ground floor terrace upstand.
- 6.73 All of the proposed apartments will be provided with private balconies, the majority of which meet or exceed the Mayor of London's Housing SPG standards and LBRuT's Residential Development Standards. The standards require that the minimum depth and width for all balconies is 1500mm, and that a minimum of 5 sqm of private outdoor space be provided for 1-2 person dwellings plus an extra 1sqm for each additional occupant thereafter.

6.74 Balconies have been carefully oriented to ensure that residents benefit from natural light whilst avoiding any issues in terms of privacy and overlooking, with central balconies on the southern facade facing the flank wall of the adjacent house.

6.75 As such, it is considered that the hard and soft landscaping proposals are consistent with LBRuT proposals for the Station Yard/Station Road junction realignment and enhance the public realm within the vicinity of the site, improving the townscape and pedestrian and cycle environment.

Refuse and Recycling

6.76 The proposed bin store has been designed with reference to LBRuT's Refuse and Recycling Storage Requirements SPD which requires adequate storage capacity to allow for weekly collections or refuse and recyclables.

6.77 In the case of the proposed development, we would submit the following with regard to the waste management strategy:

- The siting and design of the bin store will not result in any adverse impact to residential amenity;
- The bin store will be easily accessed by occupiers of the proposed development and by local authority/private waste providers;
- The bin store will not obstruct pedestrian, cyclists or driver site lines.

Drainage

6.78 The proposals are supported by a Drainage Strategy Report which was produced by Pell Frischmann and sets out the proposed surface water drainage strategy for the development. The report also notes the existing underground services, including a water main, surface water sewer and foul water sewers.

6.79 As part of the development, it is proposed to build over the existing foul and surface water sewers and divert the existing water main under Station Yard to comply with Thames Water clearance requirements. The report notes that build over and diversion agreements are currently being discussed with Thames Water.

6.80 The sustainable drainage features to be incorporated as part of the proposals are an extensive green, seedum roof over the whole scheme and a 35m³ attenuation tank below the slab. Permeable paving is being considered for the two car parking bays. These measures will ensure the reduction of runoff across the site, improve attenuation and improve building performance whilst adding ecological value.

6.81 A number of additional drainage features were also considered such as ground infiltration, large-scale attenuation and connection to existing watercourses. However, these were not

considered suitable or practical for the development due to ground conditions and the relatively small scale of the proposals.

- 6.82 The report concludes that *"the proposed development can be adequately provided with all necessary surface and foul water infrastructure and, through the use of green roof and small scale attenuation the proposed development will attenuate surface water flows, provide water quality treatment and prevent downstream flooding and reduce overall discharge rates"*.
- 6.83 In terms of drainage, the proposed development is therefore considered to be in accordance with the relevant national, regional and local planning policy.

Community Involvement

- 6.84 The planning application is supported by a Statement of Community Involvement (SCI) which provides details of the consultation and engagement activities that were undertaken by the Applicant to ensure that residents, businesses and local representatives in the area were provided with the opportunity to ask any questions about the proposals and provide feedback. The feedback was then used to inform the planning and design process in order to ensure that the proposals take into account of important issues or concerns raised by interested parties.
- 6.85 A public consultation event was held on 16 July 2019 with invites having been sent to 738 residential and business addresses within the vicinity of the site. Individual invitations were also sent to ward councilors and the Leader of Richmond Council and an advertisement was posted in the Richmond and Twickenham Times newspaper.
- 6.86 The event was staffed by members of the planning and design team, including Solum Regeneration (Twickenham) LLP (the Applicant), Wimshurst Pelleriti (Project Architects), Union4 Planning (Planning Consultants), Mayer Brown (Transport Consultants) and Portland (Community Engagement Consultants).
- 6.87 A series of exhibition boards were on display to provide details and images of the proposed development, as well as highlighting key features of the scheme, including public realm, design, and project timelines.
- 6.88 Approximately 96 people attended the event of which 56 gave feedback on the proposals using the forms provided. Overall, 40% of respondents were strongly supportive or supportive of the plans, 31% were neutral and 29% opposed or strongly opposed the scheme.

Affordable Housing

- 6.89 A Viability Assessment was undertaken by Savills to identify the level of planning obligations the scheme can sustain, including the provision of affordable housing.

- 6.90 It was determined that the proposals contain a financial viability deficit, and therefore the scheme is not considered commercially viable in planning viability terms. Notwithstanding this, the Applicant is committed to providing some level of affordable housing given their wider activity locally. This provision will in part be informed by the review of the viability information undertaken by the Council's advisors and discussions over the nature of any affordable provision that might be made. It should be highlighted that there are challenges within the scheme configuration in relation to LBRuT's policy target of affordable housing delivery as the small footprint of the site only allows a single core, and thus a relatively small number of residential units.
- 6.91 The overall affordable housing that can be provided with this application will depend on the tenure, unit mix and number of units identified. The Applicant wishes to engage with LBRuT to identify the preferred route forward in order to obtain accurate input from local providers over the course of the application and to determine the nature and level of affordable units to be provided. Affordable housing is proposed to be secured through an appropriate s106 obligation at a level to be agreed with LBRuT.

7.0 Summary and Conclusions

- 7.1 In summary, the proposed development is considered to accord with the relevant national, regional and local planning policy context and represents an appropriate and suitable development for this highly accessible site within Twickenham Town Centre.
- 7.2 The site is allocated for residential development in the development plan in order to provide for a town centre residential development that also mends the urban fabric of Station Yard and enhances the local townscape and public realm.
- 7.3 There is also a policy priority in London Plan terms to make the most of highly accessible town centre locations.
- 7.4 The site is currently under-utilised and the proposed development represents an efficient use of previously developed land. The scheme will provide new, high-quality residential accommodation in a sustainable location within the borough.
- 7.5 The scheme has been informed by pre-application discussions with LBRuT, the DRP process and public consultation to ensure that as far as practicable the proposed development is informed by the comments relevant stakeholders and takes account of matters raised.
- 7.6 The site lies on the boundary between areas of distinct character and in an area of significant change, adjoining other major redevelopment proposals. The proposed scale and design of the building is in keeping with the surrounding area and this emerging townscape, striking a balance between the residential properties to the south and west, and the larger buildings along London Road to the east. The layout also retains key views of the neighbouring Albany Pub and is respectful of the railway heritage and the smaller scale of the Queens Road conservation area to the west and south.
- 7.7 The proposed development will be constructed with high-quality materials which will be carefully selected, will be sympathetic to the nearby Conservation Areas and will reflect the surrounding uses and former use of the site.
- 7.8 The development will essentially be car-free, with the exception of disabled parking which is policy compliant and is considered appropriate for a highly accessible site close to existing public transport infrastructure.
- 7.9 In conclusion, it is considered that the proposed development accords with all relevant adopted planning policies and associated guidance at the local, regional and national level. Accordingly, it is respectfully submitted that planning permission should be granted, subject to the imposition of appropriate and necessary conditions and s106 obligation.

APPENDIX 1 S106 PLANNING OBLIGATION

The application is proposed to be accompanied by a s106 obligation which would secure two elements of the proposed development:

1. Affordable housing provision under the terms of any agreement reached with LBRuT and subject to the results of the related viability appraisal;
2. Car free development, preventing future occupiers from applying for car parking permits within LBRuT.

APPENDIX 2 DESIGN REVIEW PANEL RESPONSE

**Richmond
Design Review Panel
C/o Richmond Council**

Environment and Community Services
Department
Civic Centre
44 York Street
Twickenham TW1 3BZ

Please ask for/reply to:
Telephone: 020 8891 1411
Direct Line: 020 8871 7564

Email: bsellers@wandsworth.gov.uk
Web: www.wandsworth.gov.uk

Our ref: ECS/
Your ref:
Date: 26 July 2019

Steven Fidgett
Union 4 Planning
30 Stamford Street
South Bank
London
SE1 9LQ

Dear Steven

Richmond Design Review Panel: Station Yard, Twickenham, TW1 1BD

The Panel is grateful to you and your Development Team for participating in the Richmond Design Review Panel (RDRP) held on the 12 July 2019. The Panel was able to visit the site and thanks the Team for the clear and comprehensive presentation of the proposals for Station Yard in Twickenham. This letter will remain confidential until a formal planning application has been submitted, whereupon it will appear alongside the information provided.

The proposals involve the development of the car park site on Station Yard to provide a building of 44 residential flats. The site which falls within the Twickenham Area Action Area, occupies a narrow strip of land along the railway line to the north of Station Yard and adjacent to Bridge House. The Queens Road (Twickenham) Conservation Area lies to the south-west and the site is in close proximity of the Albany Public House (PH), a Building of Townscape Merit. A dense area of three-storey terraced residential properties is located to the south. An open parcel of land currently owned by Transport for London (TfL) and used for event day and emergency parking for buses with a turning circle, adjoins the site to the south-west.

The site is used as a car park in connection with Twickenham Railway Station and currently utilised by the residents of Mary's Terrace whilst the Station development works are ongoing. The site presents a number of technical challenges that restrict the amount of developable land and constrain the design of the building. Nonetheless, the Panel is generally supportive of the design approach and suggests revisiting in particular, access to the ground floor of the building, and the appearance of the adjacent TfL site to create a more attractive and flexible public realm.

The Panel's detailed comments are set out below:

Site Development

The site is challenging due to its narrow shape, susceptibility to surface water flooding, the offset to be retained along the rail line, and various technical constraints below ground including Thames Water sewers and power lines. Importantly, the adjacent site will continue to be needed by TfL for operational purposes including bus parking/rail replacement services during match days.

Considering the broader context and the specific site constraints mentioned, the Panel is pleased to see this scheme coming forward that reclaims an under-utilised area of brownfield land at a central location in Twickenham. We also welcome the proposals to integrate the adjacent TfL site into the scheme in order to make a more liveable and pleasant environment for residents and visitors, as well as providing an improved setting for the locally listed Albany PH.

Given the site was until the mid-1950s the location of Twickenham Railway Station, we encourage the team to draw on historical references to the local railway heritage that reinforce the sense of place, and where the design of the new building and associated public realm is rooted.

Height and Massing

The proposed new building bridges between the higher and denser cluster of development around Bridge House, Regal House and Twickenham Railway Station, and the much lower scale and density of the residential areas to the south and west. The need for good quality housing and the proximity to a public transport interchange makes the site a good candidate for higher density residential development. Despite the difference in height to the adjacent residential areas being notable, the Panel is generally comfortable with the height and massing proposed on the basis that the new building relates more to the cluster of taller buildings along London Road, and the set back of the upper floor helps mitigate the transition in height to the surrounding housing.

Access, Architectural Expression and Materiality

Proposing a multi-functional space on the adjacent TfL land and integrating this within a wider public realm for the development, is considered very positive. However, the combination of event crowds who congregate there and the manoeuvring of [large] vehicles around the tight 'S' bend of the existing roadway, have the potential to make residents within ground floor flats feel exposed. The Panel agreed that a change in level from the street up to ground floor provides stronger defensible space to help overcome this, but noted that the internal steps that result, render the ground floor units inaccessible for non-ambulant occupants, which is undesirable. It is recommended that the design team explore ways to make all ground floor flats accessible/DDA compliant, and preclude the need for future occupants to retrofit individual stair lifts by introducing ramps that provide level access to ground floor accommodation.

The Panel is pleased with the calm and balanced architectural expression of the building. Cues taken from the railway heritage of the area including the [former] railway building on Brewery Lane, bring richness and interest to the elevations. The Panel agreed that quality of the building appearance will be largely provided by elegant detailing and high quality façade materials, and strongly encourages the Applicant to commit to delivering the design approach presented at the Review session.

Landscape Strategy and Amenity Space

The proposal for a new urban square on the TfL site to provide a place for residents and visitors to use and enjoy, and flexible to accommodate a temporary overflow of bus parking on match days, is applauded. The move will significantly improve the setting of the Albany PH as well as

making the space safer through greater natural surveillance from increased pedestrian activity and the addition of appropriate lighting. The Panel wishes the new square to be a quality piece of public realm and supports the intention to involve an experienced Landscape Architect in its design. We also encourage the Team to explore the opportunity to incorporate an art strategy into the proposals; this could also reference the transport heritage of the site.

Recreating the old pattern of tree planting along Station Yard (as the original Twickenham Railway Station approach) is welcomed and could make a positive contribution to the square. However, a recommendation on species is to avoid planting [more] Ash trees as these are prone to 'Ash dieback' disease. A review with the Richmond Council Tree Officer over appropriate choice of species is suggested.

In terms of amenity space, the provision of a balcony per flat is welcomed. However, given the restricted amount of green space around the building, we encourage the Team to explore introduction of green roofs. The rooftop offers opportunity to provide green amenity/garden space for the residents as well as forming a pleasant outlook from surrounding buildings.

The provision or contribution towards a Play Strategy should be considered and provided for in accordance with the relevant standards in the London Plan and local policies.

Environmental Strategy

The Panel suggests testing the site for microclimate comfort through wind modelling and mitigation measures. A full Environmental Strategy should be provided as part of the planning application. We encourage the Team in their consideration of air source heat pumps and roof solar panels as a way to make the building more sustainable.

Conclusion

The Panel is pleased to see this centrally located area of under-utilised brownfield land next to Twickenham Railway Station coming forward for redevelopment. Creating a high-quality residential development and a new public square is a significant improvement to the current situation and is applauded. Given some of the technical challenges of the site, we compliment the Team on the design response presented. As expressed above, more should be done to tease out reference to the local railway heritage and create something that feels more rooted and integrated with the surroundings.

Yours sincerely



Rebecca Mortimore

Chair, Richmond Design Review Panel
Principal, Hassell

Panel Members

Craig Anders
Glen Macfarlane
Holly Barker

Cole Thompson Anders
Macfarlane Associates
Assael Architecture

Panel Coordinator

Daniela Lucchese

Senior Urban Designer, LB Wandsworth

Attendees invited to observe

Nicki Dale

Area Team Manager North, LB Richmond

Andrew Vaughan

DM Case Officer, LB Richmond

Marc Wolfe-Cowen

Principal Urban Design Officer, LB Richmond

Cllr Martin Elengorn

LB Richmond

Cllr Roger Crouch

LB Richmond

Cllr Julia Neden-Watts

LB Richmond