Twickenham Film Studios

Planning Statement



Prepared on behalf of Twickenham Studios London Ltd. | January 2021

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1. INTRODUCTION AND BACKGROUND

Introduction

- 1.1 This Planning Statement (Statement) is prepared in support of a planning and advertisement consent application made by Twickenham Studios London Ltd for the proposed development of the Studios site at The Barons, Twickenham, TW1 2AW.
- 1.2 The proposed description of development is as follows:

Erection of a new block (Block A) at the front corner of the site together with the partial demolition of Block C and the construction of a single storey extension, the construction of an additional storey and external stair access to Block E, the construction of an additional storey above Block H and the refurbishment and modernisation of all existing blocks within the site along with new signage.

- 1.3 This Statement assesses the proposals against London Borough of Richmond upon Thames (LBR) Local Plan policies as well as the policy objectives in the London Plan and the NPPF. The Statement describes the development, explains the pre-application process and assesses the proposal against all relevant policy and other material considerations.
- 1.4 The Statement is structured as follows:
 - Section 2 describes the site and surrounding context;
 - Section 3 sets out the planning history of the site and nearby properties;
 - Section 4 outlines the pre-application discussions with Richmond upon Thames Council;
 - Section 5 provides an overview of regional and local planning policy and guidance relevant to the proposed development.
 - Section 6 provides an assessment of the proposal against the provisions of the Development Plan and other material considerations
 - Section 7 provides a summary and conclusion.
- 1.5 The following documents have been commissioned in support of the application and should be read alongside this Planning Statement:

Documents	Consultant
Arboricultrual Impact Assessment and Method Statement, Tree Survey, Tree Protection Plan and Tree Reference Plan	ACD Environmental
Heritage Statement	Montagu Evans

Transport Assessment and Travel Plan	Stantec
Flood Risk Assessment and Drainage Strategy	Logika
Local Employment Plan	ACD Environmental
Energy Strategy and Sustainability Assessment	XCO2
Preliminary Ecological Appraisal, Bat Method Statement, Initial Biodiversity Impact Assessment and Biodiversity Enhancement Strategy, and New Habitat Map	Elite Ecology
Acoustic Assessment	Noise Consultants Ltd
Air Quality Assessment	AQ consultants
Daylight Assessment and Lighting Pollution	XCO2
Health Impact Assessment	Boyer
Economic Benefits Report	Boyer

Background

- 1.6 Twickenham Film Studios were established by the London Film Company in 1913 and is London's oldest film studio. It is a multi-award winning studios with very strong local ties and global recognition as a facility and a heritage brand. The Studio is unique in London, offering three stages for live filming alongside post-production facilities. It is the only studios inside the M25 which offers script to screen production facilities and it is, therefore, of considerable importance to the television and film industry in London.
- 1.7 The London Film Company was the leading producer during the First World War, but was dissolved in 1920 and the Studios were sold off to various independent productions with the ownership and operational model changing on a number of occasions during the pre- and post-war eras.
- 1.8 In 2012, current Chairman, Sunny Vohra, saved the Studios from demolition and oversaw its recovery to once again become one of the country's most prestigious and desirable filming locations.
- 1.9 In February 2020 The Creative District Improvement Company ("TCDIC") bought a 50% stake in the Studios for development in partnership with General Projects (a London-based real estate developer with a track record of delivering employment generating developments for business of all sizes, including SMEs and those operating within the creative industries). The Creative District Improvement Company is overseeing significant investment into film studios across the country and has recently secured notable planning permissions which include a £250m investment in new studio, post production and media village space in Ashford, Kent.

- 1.10 TCDIC intend to invest significantly into Twickenham Studios to further enhance the Studios' capabilities and compete with other studios in the country and world which do not occupy such physically constrained sites.
- 1.11 Over recent years, Twickenham Studios has been used for filming and/or post-production of a number of high profile films and television series, including Calender Girls (2003), Mona Lisa Smile (2003), Wimbledon (2004), Elizabeth: The Golden Age (2007), Angels & Demons (2009), The Best Exotic Marigold Hotel (2011), War Horse (2011), The Iron Lady (2011), McMafia (2017) and Black Mirror (2014-2018). Internationally renowned actors and actresses, including Dame Judy Dench, Meryl Streep, Johnny Depp, Mark Wahlberg, Gary Oldman, Nicole Kidman and Colin Firth have all recorded at the Studios in recent years.
- 1.12 At full capacity, approximately 700-1,000 people are employed at the Studios and it is, therefore, one of the largest employers in the whole of the London Borough of Richmond.

2. SITE AND SURROUNDING AREA

- 2.1 The Twickenham Film Studios site comprises a number of buildings, which together comprise approximately 9,000sqm of floorspace with the most prominent buildings fronting The Barons. The site contains three recording stages together with a number of other buildings which are used for purposes including postproduction suites, dressing and make-up rooms, wardrobe departments, camera rooms, prop rooms, art departments and offices. The current Studios site extends to approximately 0.95ha (9,500sqm) and as illustrated by the Site Location Plan, the site is almost entirely covered in building footprint. Other than at its front (southern) corner, there is no space onto which the Studios can expand.
- 2.2 The buildings on the Studios' site display a mixed character, reflecting their time of construction. The buildings are of varying of architectural merit with some being of a stark, utilitarian appearance. Overall there is and lack of a cohesive and unifying architectural language across the site.
- 2.3 The Studios front The Barons to the east and St Margarets Road to the south. To the west is the railway line running between St Margarets and Richmond stations and to the north is the Arlington Works, 23 27 Arlington Road. The Studios has a long held interest in the acquisition of this site in order to further expand and enhance its operations.
- 2.4 To the north and east of the site, the area is predominantly residential in character. To the south, beyond Twickenham Studios, are Crown Road and St Margarets Road, which host a number of cafes, restaurants, shops and other commercial outlets.
- 2.5 In terms of Local Plan designations, the Studios site is located within an area of mixed use and the vacant plot to the south (front) corner of the site is located within the St Margarets Conservation Area. The site also lies adjacent to the Twickenham Park Conservation Area. Adjacent to the vacant plot to the south of the site is a designated shopping frontage at 126 – 116 St Margarets Road with some of these buildings also being identified as Buildings of Townscape Merit.
- 2.6 Twickenham Film Studios is defined at paragraph 10.3.6 of the Local Plan as 'locally important industrial land and business parks' (a map of the site is at Appendix 6 of the Local Plan), which are considered to of particular importance for warehousing, distribution, storage and other industrial employment, as well as, locally important creative industries.
- 2.7 There are three street trees in front of the application site which are subject to a Tree Preservation Order.
- 2.8 Due to the Studios' proximity to St Margarets Station and bus stops immediate to the front of the site, it has a Public Transport Accessibility Level (PTAL) of 4, which indicated good accessibility by public transport.

3. PLANNING HISTORY

The Site

3.1 An online search of LBR planning database returned an extensive number of planning applications relating to the site. None of the site's history is considered to be directly relevant to this application, but nonetheless, a summary of the site's history is set out in the Table at Appendix 1.

Relevant planning history surrounding the site

- 3.2 A review of the planning history in the surrounding area has been undertaken and save for a development proposal at The Arlington Works, there are no planning proposals or live permissions which are relevant to the determination of this application.
- 3.3 The Studios is a Rule 6 Party in the planning appeal made by Sharpe Refinery Service Ltd, in respect of a proposed development at the neighbouring Arlington Works site.
- 3.4 A planning application (dated 10 August 2018) was submitted to the London Borough of Richmond upon Thames and was refused permission under reference 18/2714/FUL. The development proposed comprises: 'Redevelopment of the site to provide 610sqm of commercial space (B1 Use Class) within existing Buildings of Townscape Merit plus a new build unit, 24 residential units in two blocks (5 x 1 bedroom flats, 12 x 2 bedroom flats and 7 x 3 bedroom flats) and associated car parking and landscaping and other works.'
- 3.5 Planning permission was refused at committee with the Council identifying eight reasons for refusal. The Studios' objection in that case focusses on the conflict with policies in the development plan which set out to protect industrial land for such future use. The appeal Inquiry is due to commence on 19 January 2021 and is scheduled to last for 10 days. Until such time as that appeal is dismissed, that proposed development remains a material consideration and we address the relationship with that site and proposal below.

4. PRE-APPLICATION DISCUSSIONS

4.1 As part of the planning process and in accordance with paragraph 39 of the NPPF, the applicant has engaged in extensive pre-application discussions with the Council, comprising the submission of two separate enquiries alongside presenting the proposed development to the Council's Design Review Panel.

Pre-application submission no.1

- 4.2 The first pre-application proposal was submitted to the Council in December 2019 and proposed the development of the Studios' site alongside the redevelopment of the neighbouring Arlington Works site given the Studios' hope that commercial negotiations would facilitate the acquisition of that property, allowing its development as part of an expanded, enhanced studio campus. A meeting was held at the Council's offices on 11 February 2020 with detailed written advice being provided by the Council on 11 May 2020.
- 4.3 The Council advised that the Studios is important for creative industries and for its contribution to the wider economy. The Council therefore supported the principle of developing enhanced facilities at the site including the refurbishment of existing spaces and the expansion of the facility.
- 4.4 The Council also supported the provision of new workspace in Block A alongside a café at ground floor. The Council recognised that the development would optimise cultural opportunities and would create employment alongside very important economic benefits which would positively impact on the local economy.
- 4.5 The primary focus for the first pre-application meeting was the design of Block A, which at that time was proposed to be of a contemporary design which contrasted with and complemented the adjoining terrace. The Council advised that there would be no objection to the principle of developing a new building at this part of the site and indeed made clear that there exists an opportunity for the development to significantly enhance the appearance of this corner plot.
- 4.6 The Council advised that the location of Block A within the conservation area and its proximity to neighbouring Buildings of Townscape Merit means that it is sensitive to new development. It was advised that the contemporary design of the building would be "unduly discordant" and so would not successfully fit into this location. It was recommended that the development explores a design which follows the rhythm of the existing frontages and completes the adjoining terrace. The Council's advice made clear, however, that a modern interpretation could be acceptable.

Pre-application submission no.2

- 4.7 Following receipt of the Council's initial advice, the applicants spent considerable time reassessing the proposed development in the light of the comments and recommendations received. A second pre-application enquiry was submitted to the Council in October 2020 and proposed and more considered and contextual approach to the site's development, with the design of Block A in particular being completely revisited.
- 4.8 The advice received from the Council during the meeting was very positive, with the guidance primarily focusing on the evolution of the design of the development, including more detailed matters around the use of materials and the redecoration of buildings within the site.
- 4.9 The Council advised that the design of Block A has advanced considerably since the first pre-application submission and comments centred around design features on the front façade and the use of materials. Questions surrounded the impact on the neighbouring residential amenity of the residential properties fronting onto St Margarets Road.
- 4.10 The principle of the proposed extensions to Blocks E and H were supported by the Council.
- 4.11 The signage on the front façade was supported in principle (it being noted that the building originally at the site had similar signage) but was considered to be too prominent and it was suggested that it be reduced in size. The Council advised that the street furniture and cycle racks removed from the front of the site will need to be accommodated elsewhere in the development proposals. The Council also advised that the protected trees to the front of the site could be removed and with associated highway repairs to be secured through a legal agreement.

Design Review Panel Presentation

- 4.12 The proposed development was presented to the Council's Design Review Panel in December 2020.
- 4.13 In terms of the overall design approach, the Panel advised that the design did not deliver a holistic vision for the entire site and so it was suggest that a 'joined up' design concept should be used with strong rationale that appropriately addresses architecture, urban design, public realm and sustainability aspects. The Panel also suggests holistic site-wide strategies, such as design interventions to help establish an urban 'campus' feel. A common design language for all architectural interventions and a common strategy for external signage and wayfinding was also encouraged alongside upgrading or replacing the site boundary wall to present a more cohesive street frontage.
- 4.14 The design approach to Block A, comprising a deconstruction of the adjoining historic terrace was supported and it was considered that the "façadism" approach being advocated resonated with the use of the site although concern was raised regards the proposed use of material (Corten steel) and the prominence of the top floor. The Panel also supported the proposed extension of Blocks E and H, albeit with some associated design recommendations.

- 4.15 The Panel considered the relationship between Block A and Block B to be very important, including the view along The Barons towards St Margarets Road and further consideration has been given to this, as described in the Design and Access Statement.
- 4.16 Whilst the roof extensions at Blocks E and H were supported in principle, the Panel suggested referencing the design of Block A in order to reinforce the shared, site-wide approach, but considered consistency of materials and graphics would help enhance this.
- 4.17 In terms of the 'Public Realm and Boundary Wall', the Panel suggested introducing a footway and soft planting with the boundary wall becoming a binding architectural element in terms of materiality.
- 4.18 Finally, the Panel suggested that the signage is given more prominence and a consistent graphic style and appearance to provide a strong narrative and unifying effect.

5. PROPOSED DEVELOPMENT

- 5.1 The development proposals include the partial demolition of Block C, the refurbishment of all buildings and the extension of Blocks E and H. The proposal also includes the construction of a new building (Block A) at the corner of St Margarets and The Barons, Twickenham, TW1 2AW.
- 5.2 Overall, approximately 1,740 sqm of new build is proposed across the site, with the majority comprising new space to be used in association with the operation of the studios (Use Class E(g)(iii) industrial processes (formerly Use Class B1(c)) with the upper floors of new Block A (approximately 664sqm) proposed to be used as offices (Use Class E(g)(i) (formerly Use Class B1(a)). The new ground floor accommodation at Block A will comprise a café (Use Class E(b)), which would be open to the public and would extend to approximately 240sqm.
- 5.3 Block A comprises the erection of a new, landmark four-storey building located within the Site's south eastern corner to provide a new ground floor café fronting St Margarets Road and The Barons, and 664 sqm of modern co-working office space across the upper floors. At fourth floor the curved elevation will be set back from the façade behind a roof terrace. The main entrance will front onto St Margarets Road. In order to accommodate this new building, a section of the boundary wall enclosing the site will be removed, as well as the street trees, cycle parking and street furniture on the highway.
- 5.4 Block A's front façade will be made out of terracotta-coloured concrete, formed in polystyrene casts in order to achieve the fine level of detail required to complement the adjoining terrace. The historic 'Twickenham Film Studios' sign will be reinstated onto the front façade.
- 5.5 Block B will see the refurbishment of the foyer, cinema, and Foley Studios at ground floor, at the second floor, new office space will be created within the building following the rationalisation and reorganisation of other spaces. At roof level the Lounge will be refurbished and the kitchen will be extended. The façade of Block B will retain the period blue panels and be redecorated.
- 5.6 The façade of main TV Studio in Block C will be enhanced through the removal of the decaying ventilation ducts. A new sign that reads 'Studio 3' will be painted onto the front elevation in white letters. These works of redecoration and repair do not require planning permission. The studio will contain a new build prop store in the south-eastern corner, providing 198 sqm of additional floor space, and will see one of its stages converted from a production studio to a TV studio. The roof of Block C will be covered in PV panels. The new prop store will also contain a refuse storage area.
- 5.7 Block D is ancillary to Block B and will be refurbished and redecorated. The works to this block do not require planning permission.

- 5.8 Block E will have a light weight roof extension added above the main building at second floor level with the new space to contain post-production suites and a theatre, providing 439 sqm of additional floor space. The extension will be of a pre-fabricated construction in order to ensure a swift on-site construction process, which will minimise disruption to filming and use of the production suites. A new stair and lift core will be constructed to the east side of the building, leading up from ground floor to the first and second floors. At first floor level there will be an external walkway with doors opening into the canteen and breakout space. The outside area will also provide an enhanced external landscaped courtyard with an Airstream Café.
- 5.9 Block F will be have its exterior shell repainted and a sign of 'Twickenham Film Studios 1' in white block lettering on the façade facing The Barons. Again, the works to Block F do not require planning permission.
- 5.10 Block G will have an exterior refurbishment, with an addition of a sedum roof. These works are not considered to require planning permission.
- 5.11 Block H will have a light weight, pre-fabricated roof extension added to the south side of the building. The new space will provide expanded (204sqm of additional floorspace) and enhanced accommodation within the Studios' Oscar-winning Sound Centre. As with the proposed extension at Block E, the pre-fabricated construction ensures minimal disruption to the operation of the sound theatres within this building.
- 5.12 A new cycle store with capacity for 100 bikes will be provided between Block A and Block B.

Advertisement Consent

5.13 As noted above, the development proposes the reinstatement of the iconic and historic "Twickenham Film Studios" sign on the front elevation of Block A. The sign will comprise individually formed white letters which will have illumination.

6. PLANNING POLICY CONTEXT

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act (2008) sets out that the starting point for the determination of planning applications are the policies in the development plan unless material considerations indicate otherwise.
- 6.2 The development plan in Richmond relevant to this application comprises the London Plan (2016) and the Local Plan (2018). The Government's planning policy objectives as set out in the NPPF are also material considerations.
- 6.3 On 21 December 2020, the Mayor of London published the Publication London Plan, which included changes made to the Intend to Publish London Plan in response to Directions issued by the Secretary of State. There is now a final 6 week period within which the Secretary of State can issue further Directions, or can approve the Plan for adoption. Once adopted, the Plan will form part of the development plan for Richmond and will replace the current London Plan. The emerging policies now carry almost full weight.
- 6.4 This section of the report provides a summary of the relevant planning policy framework against which the application will be assessed. It covers national, regional and local level policies of relevance to the site.

National Planning Policy Framework (February 2019)

- 6.5 In February 2019, the National Planning Policy Framework (NPPF) was published by the Department of Communities and Local Government. The NPPF sets out the Government's economic, environmental, and social planning policies for England; it states that the purpose of the planning system is to contribute to the achievement of sustainable development. Sustainable development can be defined as development which meets the needs of the present without compromising the ability of future generations to meet their own needs. In terms of economic sustainability, the NPPF supports the building of a strong, responsive and competitive economy. It sets out to achieve this by ensuring that sufficient land of the right type is available in the right place and at the right time in order to support economic growth, innovation and improved productivity.
- 6.6 At the very heart of this objective is the acknowledgement that growth is necessary to enable the country and our communities to support themselves. Growth and development must happen in order to accommodate the needs of a growing population, through the provision of employment and the generation of economic growth.
- 6.7 Section 6 of the NPPF relates to building a strong, competitive economy and in paragraph 80 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It further states that weight should be placed on the need to support economic growth and productivity, so that Britain can be a global leader in driving innovation and productivity.

- 6.8 Paragraph 82 requires planning policies and decisions to recognise and address the specific locational requirements of different sectors, making provision for clusters or networks of creative or high technology industries.
- 6.9 Section 11 encourages planning policies and decisions to promote an effective use of land, utilising previously-developed land and supporting the development of under-utilised land and buildings and airspace above existing commercial premises.
- 6.10 A specific focus on conserving and enhancing the historic environment forms Section 16 of the NPPF. The overarching aim of the policy is to ensure that developments preserve or enhance the historic character, appearance and significance of heritage assets. Paragraph 201 is relevant, noting that not all elements of a Conservation Area will necessarily contribute to its significance.

Regional Planning Policy

London Plan (2016)

- 6.11 The London Plan provides the strategic policy context for all of London and seeks to provide an integrated framework for its development to 2036. Its main themes are economic development, social development and improvement of the urban environment.
- 6.12 Policy 4.1 (Developing London's Economy) promotes the development of strong and diverse economy, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost. There is also a need to promote London as a suitable location for European and other international agencies and businesses.
- 6.13 Policy 4.2 (Offices) supports the management and mixed use development and redevelopment of office space to improve London's competitiveness, and to attract businesses of different types and sizes. The policy also encourages the increase in the current stock and renewal and modernisation of office stock in viable locations to improve its quality and flexibility.
- 6.14 Policy 4.4 (Managing industrial land and premises) aims to ensure a sufficient stock of land and premises will meet the future needs of different types of industrial and related uses in different parts of London. The supporting text at paragraph 4.20 explains that Boroughs must make clear in DPDs the types of uses considered appropriate for industrial sites across different industrial land designations, including sites which are not designated industrial sites.

- 6.15 Policy 4.6 (Support for and enhancement of arts, culture, sport and entertainment) supports the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors. The policy also aims to enhance and protect creative work and performance spaces, and seeks to enhance the economic contribution and community role of arts, cultural and entertainment facilities. The supporting text at paragraph 4.32 sets out strong, unequivocal support for the creative industry, noting that this is "central to the city's economic and social success". The text further explains the Mayor's objective to maintain London as one of the greatest world cities for creativity, addressing the need to increase the provision of targeted support for the creative industries.
- 6.16 The Mayor seeks to reduce London's carbon dioxide emissions through Policy 5.1 (Climate Change Mitigation) and Policy 5.2 (Minimising carbon dioxide emissions), ensuring that development proposals should Be lean: use less energy, Be clean: supply energy efficiently, and Be green: use renewable energy.
- 6.17 Policy 5.3 (Sustainable Design and Construction) ensures that new developments standards of sustainable design and construction to improve their environmental performance and adapt to effects of climate change over their lifetime.
- 6.18 Similar to Policy 5.3, Policy 5.4 (Retrofitting) encourages the implementation of sustainable design and construction to new developments and existing buildings through the retrofitting of energy efficiency measures, decentralised energy and renewable energy opportunities.
- 6.19 The Mayor seeks to increase the proportion of energy generated from renewable sources through Policy 5.7, which promotes the use of on-site renewable energy generation.
- 6.20 Policy 5.10 (Urban Greening) promotes the uses of new planting in the public realm and multifunctional green infrastructure, including tree planting, green roofs and walls, and soft landscaping, to help mitigate the effects of climate.
- 6.21 Policy 5.11 (Green Roofs and Development Site Environs) requires major development proposals to include roof, wall and site planting, especially green roofs and walls where feasible.
- 6.22 London Plan Policy 5.13 promotes the use of SuDS to reduce the contribution of climate change to flooding and seeks to ensure that surface water runoff is managed as close to its source as possible.
- 6.23 Policy 6.3 (Assessing Effects of Development on Transport Capacity) requires development proposals to full assess the impact on transport capacity and the transport network, at both a corridor and local level, through a transport assessment.
- 6.24 Policy 6.9 (Cycling) requires developments to provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3 and the guidance set out in the London Cycle Design Standards and provide on-site charging facilities and showers for cyclists.

- 6.25 Policy 6.10 (Walking) ensures development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space.
- 6.26 Through Policy 6.13 the Mayor seeks to see an appropriate balance between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. The maximum standards for parking are set out in Table 6.2.
- 6.27 Developments should be of high quality design and have regard to the form, function and structure of a place, and the scale, mass and orientation of surrounding buildings, as required by Policy 7.4 (Local Character). Paragraph 7.13 supports designs based on an understanding of the character of a place and encourages new development to help residents and visitors understand where a place has come from, where it is now and where it is going.
- 6.28 Policy 7.5 (Public Realm) ensures that London's public space should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.
- 6.29 Policy 7.6 supports architecture that is of the highest quality and that makes a positive contribution to a coherent public realm, streetscape and wider cityscape. Proposed buildings and structures should be of highest architectural quality, be of scale and orientation that enhances the public realm, comprise details and materials that complement local architectural character, not cause unacceptable harm to the amenity of surrounding land and buildings, incorporate resource management and climate change mitigation, provide high quality indoor and outdoor space, and meet the principles of inclusive design.
- 6.30 Policy 7.8 (Heritage Assets and Archaeology) seeks to protect heritage assets by enhancing their significance and utilising their positive role in place shaping. Furthermore, development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 6.31 London Plan Policy 7.14 (Improving Air Quality) requires new developments to be air quality neutral and not lead to further deterioration of existing poor air quality.
- 6.32 Policy 7.19 (Biodiversity and Access to Nature) ensures that development proposals, where possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity. LDF's should identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites.
- 6.33 Policy 7.21 (Trees and Woodlands) seeks to protect and retain existing trees of value and prevent any loss as a result of development. Wherever appropriate, the planting of additional trees should be included in new developments.

Richmond Local Plan

- 6.34 Policy LP1 (Local Character and Design Quality) requires all developments to be of high architectural and urban design quality, and where possible developments should maintain and enhance the high quality character and heritage of LBR's villages. Proposals should have a relationship to existing townscape, include sustainable design and construction, appropriate layout, siting and access, and be of inclusive design. Part C relates to 'Advertisements and hoardings' over which the Council will ensure the character of individual buildings and streets are not materially harmed, having regard to the interest of amenity and public safety.
- 6.35 Paragraph 4.1.14 provides more detailed advice on advertisements and hoardings. The Council require advertisements to not have an adverse effect upon road traffic conditions and public safety, Conservation Areas, listed buildings or BTM, views, predominantly residential areas.
- 6.36 Policy LP2 (Building Heights) sets out to ensure that new buildings, including extensions and redevelopment of existing buildings, respect and strengthen the townscape through appropriate building heights, thereby respecting the borough's heritage assets and local context.
- 6.37 The Council will seek to conserve and enhance the borough's 'Designated Heritage Assets' through Policy LP3. Part C requires all proposals in Conservation Areas to preserve and enhance the character or the appearance of the Conservation Area. Paragraph 4.3.5. of the supporting text states that development proposals should describe the significance of any designated heritage assets or their settings affected and demonstrate how the development protects, and where possible enhances the setting, including views, gaps and vistas as identified in relevant Conservation Area Studies.
- 6.38 In a similar fashion, Policy LP4 seeks to preserve, and where possible enhance, the significance, character and setting of 'Non-Designated Heritage Assets', including Buildings of Townscape Merit.
- 6.39 All developments will be required to protect the 'Amenity and Living Conditions' of new, existing, adjoining and neighbouring properties through Policy LP8. The design and layout of buildings should enable good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development. Proposals should not visually intrude or have an overbearing impact as a result of their height, massing or siting.
- 6.40 Policy LP10 (Local Environmental Impacts, Pollution and Land Contamination) seeks to ensure that development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, by monitoring air quality, noise and vibration, light pollution, odours and fume control, land contamination and through construction and demolition.
- 6.41 Policy LP15 will seek to protect the Borough's 'Biodiversity', by creating new habitats or biodiversity features on development sites and in the design of buildings themselves, enhancing wildlife corridors and maximising the provision of soft landscaping.

- 6.42 Policy LP16 (Trees, Woodlands and Landscape) will seek to protect and retain existing trees, unless the tree has little or no amenity value, and require new trees to be of a suitable species for the location.
- 6.43 Local Plan Policy LP 17 'Green Roofs and Walls' states that green and/or brown roofs should be incorporated within all major developments where technically feasible.
- 6.44 Policy LP20 (Climate Change Adaption) promotes and encourages new development in their layout, design, construction, materials, landscaping and operation to be resilient to the future impacts of climate change and to minimise the effects of overheating and energy consumption.
- 6.45 Policy LP21 (Flood Risk and Sustainable Drainage) requires all development proposals to avoid or minimise contributing to all sources of flooding.
- 6.46 Policy LP22 requires developments to achieve the highest standards of 'Sustainable Design and Construction' to mitigate the likely effects of climate change. Developments of 100sqm or more of non-residential floor space will be required to complete the Sustainable Construction Checklist SPD and to meet BREEAM 'Excellent' standard. Development proposals should improve energy conservation and efficiency as well as contributions to renewable and low carbon energy generation. Part B3 challenges all non-residential buildings over 100sqm to achieve zero carbon standards in line with London Plan policy.
- 6.47 Policy LP 23 relates to 'Water Resources and Infrastructure' requires sufficient capacity in the public sewerage network to facilitate development.
- 6.48 Policy LP24 (Waste Management) seeks to ensure that development proposals include refuse and recycling facilities in the overall design of the scheme, in line with the guidance set out in the Council's SPD on Refuse and Recycling Storage Requirements.
- 6.49 The Council will support a strong and diverse local economy. Policy LP40 (Employment and Local Economy) requires land in employment use to be retained in such use for business, industrial or storage purposes. The provision of small units, affordable units and flexible workspace is encouraged, and for mixed use development should retain and enhance existing employment floorspace.
- 6.50 Paragraph 10.1.3 highlights the importance of having a large range of local employment opportunities for its residents without the need to travel far.
- 6.51 Policy LP41 (Offices) encourages the provision of a range of office premises, particularly for small and medium sized business activities, to allow businesses to grow and thrive. The policy seeks to retain all office floorspace including low cost office space to meet the requirements of small businesses and start-ups. Part C supports new office development that would be suitable for local businesses and small firms.

- 6.52 Policy LP42 (Industrial Land and Business Parks) sets a strong policy presumption in favour of the protection and enhancement of the Borough's industrial sites. At Part C the policy offers very strong support for the expansion and enhancement of sites identified as 'locally important industrial land and business parks', which includes the Twickenham Film Studios site.
- 6.53 Policy LP44 (Sustainable Travel Choices) seeks to ensure that new developments maximise the permeability of a site for walking and cycling, provide safe access to public transport, and create no detrimental impact to the local or strategic highway networks.
- 6.54 Policy LP45 (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, whilst also minimising the impact of car based travel including on the operation of the road network and local environment. Paragraph 11.2.3 explains that fewer parking spaces can be provided when a Transport Assessment can show that there would be no unacceptable adverse impact on on-street parking availability, amenity, street scene, road safety or emergency access in the surrounding area, as a result of the generation of unacceptable overspill in the vicinity. Paragraph 11.2.8 requires all major development proposals to provide Delivery and Servicing Plans and Construction and Logistics Plans.

Emerging London Plan

Publication London Plan 2020

- 6.55 The emerging London Plan is at a very advanced stage with the new policies now attracting almost full weight.
- 6.56 Chapter 1 sets out the Mayor's objectives for Good Growth in London. This is growth that is socially and economically inclusive and environmentally sustainable. The objectives set out in Chapter 1 of the emerging plan underpin the whole Plan and each policy. To ensure that London's future growth is "good growth", each of the policy areas is informed by a good growth objective. Objective GG5 sets out the Mayor's objective to grow London's economy. The objective explains the aim to enhance London's global economic competitiveness with the city's success being shared amongst all Londoners. It explains that planning and development must seek to ensure that London's economy diversifies and that the associated benefits of this are shared more equally across London. Criterion C is of particular relevance in that it explains that planning and development should plan for "sufficient employment and industrial space in the right locations to support economic development and regeneration".
- 6.57 The supporting text at paragraph 1.5.1 notes London's unique strength in the creative industries as well as in other sectors and explains that the wealth this generates "is essential to keeping the whole country functioning".

- 6.58 Paragraph 1.5.6 states that Britain's exit from the EU will put pressure on London's economy and explains that the need to strengthen and diversify London's business base will be evermore important. Achieving this in a way that spreads London's success more evenly across the City is noted as being an important part of delivering Good Growth and emphasises the need to support employment generating development in areas other than those specifically designated for industrial and employment purposes.
- 6.59 Delivering good design is addressed through Emerging Policy D4 and seeks to ensure that development proposals are scrutinised and meet the design requirements of the London Plan. Furthermore, emerging Policy D5 requires that development proposals are designed inclusively.
- 6.60 Emerging Policy D8 (Public realm) aims to ensure that development proposals create a public realm that is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. The policy also requires lighting, for advertisements, to be carefully considered and well-designed.
- 6.61 Emerging Policy E1 (Offices) promotes improvements to offices of different sizes, including refurbishment and incorporation into mixed-used development proposals. Criterion E requires existing viable office floorspace capacity in locations outside the areas identified in Part C to be retained and where appropriate, redeveloped.
- 6.62 Emerging Policy E2 relates to the provision of suitable business space and supports the provision and protection of a range of such spaces.
- 6.63 Emerging Policy HC1 (Heritage conservation and growth) states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 6.64 Policy HC5 (Supporting London's culture and creative industries) supports the continued growth and evolution of London's diverse cultural facilities and creative industries and protects existing cultural venues. It explains that this growth can be achieved through the intensification of an industrial area.
- 6.65 Paragraph 7.5.2 and 7.5.3 note the importance of London's culture sector and the creative industries, which deliver both economic and social benefits for the capital. In 2015, the Gross Value Added (GVA) of the creative industries in London was estimated at £42 billion, accounting for just under half of the UK total from these industries, and contributing 11.1 per cent to London's total GVA.
- 6.66 Despite this generally positive picture, paragraph 7.5.4. describes the struggle that creative industries face when trying to find sufficient venues to grow and thrive, and as a consequence of London's competitive land market, they tend to lose out on essential spaces and venues for cultural production.

7. PLANNING ASSESSMENT

7.1 In this section we assess the proposed development against the relevant policy objectives set out in the development plan, the NPPF and the emerging London Plan, as described above. Our assessment of the main planning matters considers the principle of development; design; heritage; neighbouring residential amenity considerations; and relevant technical matters.

Principle of development

- 7.2 In line with the foregoing summary of the existing and emerging policy context, it is clear that there is considerable support for the principle of expanding and enhancing Twickenham Studios. The site is identified as a locally important industrial land and business park at Policy LP42, which establishes a strong presumption in favour of the proposed development. This presumption is enhanced further by the emerging policies in the Publication London Plan, specifically at Policy GG5, which supports "good growth" and Policy HC5 which acknowledges the importance of the creative industries to London's economy and supports developments which facilitates the continued growth and enhancement of this sector. In addition, at paragraph 80 of the NPPF, the Government establishes that planning decisions should help create the conditions in which businesses can invest, expand and adapt and further states that weight should be placed on the need to support economic growth and productivity, so that Britain can be a global leader.
- 7.3 Overall, the proposed development will provide a net increase of 1,740 sqm of new floorspace, facilitating the expansion and enhancement of the Studios alongside the formation of a café which will be open to the public and co-working office space within new Block A. All of the proposed uses are appropriate at this site, enhancing the existing facility, providing much needed co-working office space and a café, all of which will complement and enhance this commercial part of St Margarets.
- 7.4 The Economic Benefits Statement assesses the positive impact the development will have, including an assessment of the uplift in employment opportunities arising from the development and the associated fiscal and other benefits to the local economy. The Statement identifies that the proposed development would invest £10 million in building the redeveloped film studios, generate £2,266,000 additional GVA and 44 construction jobs over an 18 month build period, create 60 jobs overall and that studio audience members would generate an additional £2.5 million of spending in the local area each year.
- 7.5 In the light of the overwhelming policy support and the significant economic benefits arising from the development, the principle of expanding and enhancing Twickenham Film Studios is clearly acceptable.

7.6 The proposals will provide much needed refurbishment of the Studios, whilst increasing the floor area, and rationalising existing floorspace to increase their efficiency and to enhance further the Studios' global reputation. The Studios are internationally renowned, and one LB Richmond's landmark creative industry employers. The proposals will boost investment and employment within the Borough, generating very significant economic benefits to both the local and national economy.

Design of the development

- 7.7 Policy in the development plan and in the NPPF seeks to ensure that development achieves a high standard of design, respecting the character of the surrounding area in order to reinforce local distinctiveness. In particular, Policy LP1 requires all development to be of a high architectural and urban design quality.
- 7.8 The Council has published a number of Village Planning Guidance Supplementary Planning Documents (SPD). The purpose of the documents is primarily to establish a vision for maintaining and enhancing the character of the individual areas. The Twickenham Studios site is located within the area covered by the East Twickenham SPD (2016), however, the area outside the Studios is within the St Margarets SPD area. Both guidance documents have been considered in the preparation of this application proposal.
- 7.9 The East Twickenham SPD sets out that the Studios are important to the character of the area and the Council's economic strategy and the SPD's vision is based on the retention of studio use on the site. The document identifies an opportunity to improve the boundaries and areas adjacent to Twickenham Studios.
- 7.10 The Studios forms part of Character Area 11 "Ravensbourne Road and surrounds" and specifically the area defined as "The Barons". The SPD notes that the Studios forms much of the north western boundary of the area and identifies the pebbledash boundary wall running along the The Barons. It further describes that despite the industrial character of the Studios, the streets are tree-lines and the studio buildings are not unduly prominent in the general streetscape. The SPD identifies a small number of threats and opportunities, including increased parking pressure following development and the potential to improve the public realm and boundary areas adjacent to Twickenham Studios.
- 7.11 The St Margarets SPD makes reference to the Studios in its consideration of the Crown Road Conservation Area (within which proposed Block A is situated). In its consideration of the opportunities which exist to enhance the conservation area, it identifies the potential to enhance the architectural quality of the area and to improve the overall streetscape including the area outside the Studios and to street paving. In respect of signage, the SPD notes that this should be of a sympathetic design, having regard to both size and use of materials.

- 7.12 The existing Site and its surroundings present a number of opportunities to which the proposed design and has sought to respond to. Pre-application discussions with the Council, including the DRP were positive and the advice given by officers and the Panel has significantly influenced the design of the development and in particular has seen a complete redesign of proposed Block A and a revised site-wide strategy in respect of the use of materials and the delivery of a unified architectural language.
- 7.13 The overall rationale for design and materiality are covered in-depth within the Design and Access Statement prepared by Hollaway. However, a summary of the design of the development's key features is discussed below.
- 7.14 The main new intervention into the site is the proposed construction of Block A. This is proposed to be a 4 storey building, the top floor of which is recessed behind the parapet of the main building below. The building will contain ground floor office space with co-working space above.
- 7.15 The initial concept for this building was a highly contemporary building, but following the Council's advice, a more contextual approach has been taken with the aim of completing the terrace and replacing the buildings which formerly stood at this part of the site, but which were destroyed by fire.
- 7.16 The building will be constructed from through-coloured concrete, the colour of which will be controlled to respect that of the adjoining terrace and the curved front elevation will extend the building's active frontage around the corner and along The Barons.
- 7.17 The design of the building is a deconstructed version of the adjoining terrace and as explained at pg.42 of the Design and Access Statement, the proposed front elevation incorporates the detailed design features of the terrace, but in a playful way, which respects the creative industry use of the existing and future enhance operations at the Studios site.
- 7.18 The north side elevation of the building will stand forward of existing Block B and a great deal of care and consideration has been given to its design and construction. The narrative explained in the Design and Access Statement (pg.63) is that the design follows the idea of a film set façade which is constructed around a scaffold frame. Again, such a creative and imaginative design interpretation enhances the building's contribution to the site's character and will add interest to and enhance views along The Barons towards St Margarets.
- 7.19 Although the construction of new Block A will result in the loss of the street trees, the development will, through a s.106 obligation, secure the repair of the highway across the front of this block. Coupled with this, the long-standing vacant plot at the site will be developed with a new building of very high architectural quality which respects both the surrounding context and the character and use of the subject site. Accordingly, this part of the development meets the design policy objectives of the existing and emerging development plan and the NPPF.

- 7.20 The new "Twickenham Film Studios" signage proposed on the front elevation of Block A was subject of considerable discussion and support across the pre-application phase of the project. The size and location of the sign has been revised in accordance with officer advice and as such is considered to be acceptable.
- 7.21 Alongside the construction of the new building at Block A, the boundary wall along The Barons will be repaired and finished in a matching material in order to enhance the site's appearance along The Barons and to deliver a more unified public-facing design to the Studios campus.
- 7.22 The front section of Block B that faces The Barons has a tired appearance, with the rear having an industrial, utilitarian appearance. The proposals involve the redecoration of the external façade to whole block, which will improve to the building's public facing elevation. At ground floor will be an enhanced public reception, including a small infill extension to form the new entrance to the block, along with a new cinema (with associated bar and lounge) and Foley Studio and store.
- 7.23 The small cinema will show films predominantly made at The Studios and it is proposed that this will be open to the public.
- 7.24 The office spaces on the upper floors will be refurbished and the kitchen for 'The Lounge' will be extended, although this will not require any external expansion or alteration of the building.
- 7.25 In view of the nature of the works, predominantly involving internal alterations and works of maintenance and repair the building's exterior, it is not considered that planning permission is required for the works proposed to Block B.
- 7.26 Block C is a large red brick building which contains the main filming stage. To the eastern corner of the building is a single storey structure, which is proposed to be demolished. This will be replaced with a new extension containing a new prop store, which will provide more space and a more efficient internal layout. The new extension will stand to the equivalent of 2 storeys in height, but will be a double height space internally. The extension will stand below the height of the existing Block and will have a flat green roof.
- 7.27 A large section of the existing roof above Block C will have new PV panels installed.
- 7.28 The building's elevations, which are currently plain, will have a new painted sign reading 'Studio 2', which will help break up its mass and provide visual interest. This signage does not require advertisement consent. The exterior ducts and vents on the main building will be removed and matching brickwork used to make good.
- 7.29 The works proposed to Block C are considered to be uncontentious and the design of the new extension and associated external works to the existing building will enhance its appearance within the site and when viewed from The Barons.
- 7.30 Block D will provide a refurbished art department and ancillary spaces. The external facades will be redecorated with such works not requiring planning permission.

- 7.31 The light weight roof top extension for post-production offices and external staircase and terrace in Block E will create a visually interesting building, which will also increase the size of the usable space and create an appealing terrace/balcony for future occupiers to enjoy.
- 7.32 The extension to form the new access core will be located to the south corner of the building, enveloped by the building's western and southern limbs. Accordingly, it will not have any external impact and is an appropriate and acceptable addition to the building, which facilitates the enhancement and optimisation of the internal space.
- 7.33 The new second floor will be of a pre-fabricated design in order to facilitate swift on-site assembly and minimise disruption to the use of the theatres, suites and offices across the building's lower floors. The new extension will be finished in pre-fabricated lightweight panels with aluminium cladding system and will extend across the building's full footprint. The extension abuts the boundary with the railway line and The Arlington Works to its western and northern sides, respectively.
- 7.34 The new extension will maintain a separation from the BTMs on The Arlington Works site by approximately 9m at its closest point and as such, the relationship with these buildings will not fundamentally be altered.
- 7.35 The development proposed at The Arlington Works site (currently at appeal) includes a proposal to extend the northern BTM, infilling the gap between that building and the application site boundary. In the event that the appeal succeeds and permission is granted for that development, the proposed extension would continue to relate acceptably to the new space within that extension and it should be noted that the design of the extension proposed to Block E includes a "blind" north elevation which will prevent any mutual overlooking.
- 7.36 The development proposal at The Arlington Works site is currently a material consideration given the live appeal. In the event that the appeal is dismissed in advance of a decision being taken on this application, that proposal will cease to be a material consideration in the determination of this application.
- 7.37 At the second floor of Block H there will be a light weight extension to accommodate much needed space for the Studios' Oscar-winning Sound Centre. The existing building at Block H increases in height from 1 to 3 storeys and the proposed lightweight, pre-fabricated roof extension will increase the height of the 1 and 2 storey parts, located to the south side of the building. The design of the extension was supported at pre-application stage and the proposed use of materials will match that proposed at Block E. The front façade will display new "Sound Centre" signage, but this would not require advertisement consent.

7.38 It is detailed above and in the Design and Access Statement that very careful and close attention has been paid to the design of the development. It is concluded that the proposal will result in an overall manifest enhancement to the site's appearance, both in the location of new Block A, the boundary wall and the other design interventions across the Studios site. The development meets the policy requirement for high design quality and the proposed use of materials and the incorporation of extensive environmentally sustainable features is also considered to be acceptable.

Heritage

- 7.39 The majority of Site is located outside the Crown Road Conservation Area. However, proposed Block A is within the conservation area and the Site is located adjacent to the Twickenham Park Conservation Area.
- 7.40 The Conservation Area consists of late 19th century residential infill built following the construction of the railway. The urban quality of the street scene is emphasised by three dramatic terraced blocks of red brick, pedimented, dutch gabled design.
- 7.41 The Heritage Statement, prepared by Montagu Evans, finds the high quality design of the proposals to satisfy all of the requirements of Local Plan design policies LP1, and historic environment policies LP3 and LP4, through the enhancements to the Crown Road Conservation Area and settings of the Conservation Areas. The Statement concludes that the proposals are in keeping in terms of building heights and would result in a contextually appropriate and functional studio site.
- 7.42 The Heritage Statement concludes that the heritage benefits constitutes an overall benefit to the character and appearance of the Conservation Areas. The Statement also considers that the development will deliver a number of tangible enhancements to the Crown Road Conservation Area and the setting of the adjacent Twickenham Park Conservation Area. These include the infilling of the current gap in the terrace of St Margarets Road, reinstating the original form of the terrace, which the Statement explains will enhance the setting of the surrounding locally listed buildings. It is further explained that Block A will create a new landmark building and that enhancements to the setting of Conservation Areas will be secured through the refurbishment of the Studios' buildings and improvements to the boundary wall.
- 7.43 In the light of the evidence set out in the Heritage Statement, it is concluded that the heritage benefits constitute an overall benefit to the character and appearance of the Conservation Areas. On that basis the development would comply with the NPPF and development plan policies.

Neighbouring residential amenity considerations

7.44 Local Plan Policy LP 8 (Amenity and Living Conditions) requires that all developments protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties.

- 7.45 The nearest residential occupiers are located on the upper floors of 126-116 St Margarets Road, which is located to the south of the site. Whilst the upper floors of some of the properties are in commercial use throughout, there are a number of residential windows facing Twickenham Studios.
- 7.46 Proposed Block A will complete the terrace fronting St Margarets Road and will extend back towards Block B, slightly beyond the rear elevation of the adjoining terrace. The closest windows to the rear of the adjoining terrace are set away from the shared boundary with the Studios. The Daylight and Sunlight Report by XCO2 confirms that the new building is not considered to have a demonstrable impact on the neighbouring residents in terms of daylight, sunlight or overshadowing.
- 7.47 The other roof level extensions at Blocks E and H are well separated from surrounding residential properties along The Barons and Kelvin Drive such that there will not be any adverse light impact.
- 7.48 The Kelvin Drive properties are located between 15m and 20m from the proposed extension to the Sound Centre at Block H. Views between the properties are heavily screened by coniferous trees which line the common boundary and which are within the applicant's control. It can be ensured, therefore, that this screen will be maintained and in any event, the separation distance is sufficient to ensure an acceptable relationship would result.
- 7.49 Given the attention to detail and consideration for the relationship with neighbouring properties, it is considered that there will not be any harmful level of overlooking or unacceptable loss of privacy arising from the proposed development. Accordingly, the proposal meets the tests at Local Plan Policy LP8.

Technical matters

- 7.50 This section summarises the conclusions of the technical reports submitted with the application, including matters of noise, transport, energy and sustainability, air quality, trees, ecology, and flood risk.
- 7.51 In terms of noise matters, the Noise Impact Assessment by Noise Consultants Ltd, concludes that the development is not consider to likely to give rise to a significant adverse impact on health and quality of life in relation to noise, in accordance with paragraph 170 and 180 of the NPPF.
- 7.52 The Transport Assessment, prepared by Stantec, finds the trip generation, across all modes, from the proposed new floorspace in the daytime (between 0700-1900) is likely to be approximately 191 two-way trips. Whilst in the evening during the live audience events the site could generate a maximum of 360 two-way trips if the facilities are approaching capacity. As the proposed development will be car free most of these trips are expected to be made by public transport. These trips are shown to be satisfactorily accommodated within the integrated transport network.

- 7.53 Stantec's Report concludes that, as the number of trips generated by the live audience aspects is satisfactorily containable, a detailed crowd management plan would not be required.
- 7.54 A Parking Beat Survey was conducted and the results confirm the expected status of onstreet parking. Namely, visitors to the Studios should not expect to be able to find on-street parking easily available. The Studios will promote the live audience events as only being suitable to an audience attending by either public transport, taxis or walking.
- 7.55 The proposed development will be car free, with the site as a whole seeing a reduction of 13 car parking spaces as a result of the construction of Block A. The proposed development will also see the provision of 100 cycle parking spaces to ensure the whole site is bought in line with current cycle parking policy. This can be seen as a planning gain.
- 7.56 Extra refuse storage will be provided within the new prop store in Block C with delivery and servicing will continue as currently.
- 7.57 Stantec's Transport Assessment concludes that the proposed development is considered to be in accordance with the national, regional, and local development policies. It is considered that the implementation of the proposed development will have no adverse impact on the operation of the highway, public transport, and walk and cycle networks surrounding the development site. If is deemed necessary by the council to extend the operation time of the CPZ, Twickenham Studios London Ltd are happy to provide a contribution towards the consultation process within the S106 agreement.
- 7.58 In respect of energy and sustainability, the Energy and Sustainability Statement prepared by XCO2 concludes that the proposed development will comply with London Plan and the Council's Policies. The Energy and Sustainability Statement confirms the aspiration for the development to achieve a BREEAM rating of 'Excellent' and is expected to reduce on-site regulated carbon emissions by 42.1% with SAP10 emission factors.
- 7.59 The Air Quality Assessment, prepared by Air Quality Consultants Ltd, makes two conclusions. First that the development will be car free and thus there will be no air quality impacts at existing properties. Second, the development will be provided with heat, cooling and hot water via individual, high efficiency Air Source Heat Pumps, with supplementary photovoltaic panels therefore, there will be no centralised energy plant and thus no significant point sources of emissions within the development. The Report also shows that there will be no exceedances of the 1-hour nitrogen dioxide objectives, and thus future users of the café in Block A will experience acceptable air quality. The report summarises that the construction and operational air quality effects of the Development are judged to be 'not significant' and the development has been shown to meet the London Plan's requirement that new developments are at least 'air quality neutral'.

- 7.60 The Tree Survey, Arboricultural Impact Assessment & Method Statement and Tree Protection Plan, by ACD Environmental, finds the development proposals to be in accordance with BS5837:2012 'Trees in relation to design, demolition and construction – Recommendations'. The Statement concludes that adequate protection can be provided to ensure all retained trees are protected throughout development in the form of barriers and/or ground protection. Subject to mitigation planting agreement, as discussed at the preapplication meeting with the local authority, the trees located within the public highway are proposed for removal to facilitate the development.
- 7.61 Preliminary Ecology Appraisal by Elite Ecology concludes that any building works would be of no detriment to the surrounding habitats and landscape and that the proposed scheme would not impact upon any rare or valuable habitats. The report also suggests that root protection areas for trees need to be identified and adhered to for the installation of the fence and that designated wildlife corridors are incorporated into the design of the scheme. Specific recommendations were made in respect to the protection of bats, birds, and hedgehogs and general site enhancements.
- 7.62 A Biodiversity Net Gain report by Elite Ecology shows that a minimum of 10% gain in biodiversity can be achieved on site during and post development.
- 7.63 A Flood Risk Assessment and accompanying Drainage Strategy, prepared by Logika Consultants Ltd, finds the Site to lie within a Critical Drainage Area as defined by LBR's SWMP, but also to be entirely located within Flood Zone 1 by EA mapping, and therefore considered to be at low risk of tidal and fluvial flooding. The Report concludes that because the majority of the building would be retained as existing, in particular through the centre of the Site, there would be no change in flow routes caused by the new development. Where new build elements are proposed FFLs would be set above the level of the external surfaces. The report demonstrates that the development has a low risk of flooding from tidal, fluvial, pluvial, groundwater and artificial sources, and would not increase flood risk elsewhere. It is considered that the information provided within this report satisfies the requirements of the NPPF and local policy.

8. CONCLUSION

- 8.1 The proposed development comprises the erection of a new block (Block A) at the front corner of the site together with the partial demolition of Block C and the construction of an extension, the construction of an additional storey and external stair access to Block E, the construction of an additional storey above Block H and the refurbishment and modernisation of all existing blocks within the site along with new signage.
- 8.2 The proposals enable the much-need refurbishment of the Studios whilst increasing the useable floor area and rationalising existing floorspace to increase efficiency. The works are considered essential to enhance the Studios capabilities and ensure that they remain competitive in the global and national market.
- 8.3 Expansion of the world class, Oscar-winning film studio in St Margarets will create jobs for local residents, will attract investment from national and international television and film production companies, will enhance the Twickenham Film Studios brand and will provide a café and work-spaces that will benefit the local community and London as a whole .
- 8.4 The development will deliver substantial economic benefits through the construction and operational phases. It will assist the growth and further diversification of Richmond's and London's economies and facilitating the expansion of a world-renowned Studios at a time when there is otherwise rising unemployment and economic uncertainty following the UK leaving the EU and the impact of the Coronavirus pandemic.
- 8.5 The development will be of the highest quality architectural design, improving the character of the local area and resulting in localised enhancements to the Conservation Areas and their settings.
- 8.6 The technical reports submitted with the application demonstrate that there will be no unacceptable impact on the neighbouring residential properties in terms of access to daylight and sunlight, or resulting from overlooking.
- 8.7 The technical reports also demonstrate that there will be no detrimental environmental impact in terms of transport, noise, air quality, trees, ecology and energy.
- 8.8 There will be significant sustainability benefits including on-site renewable energy generation technology in the form of roof-mounted PV panels and sedum roofs.
- 8.9 In the absence of any identifiable conflict with adopted policy objectives, the Council is respectfully requested to grant planning permission for the proposed development.

APPENDIX ONE – PLANNING HISTORY

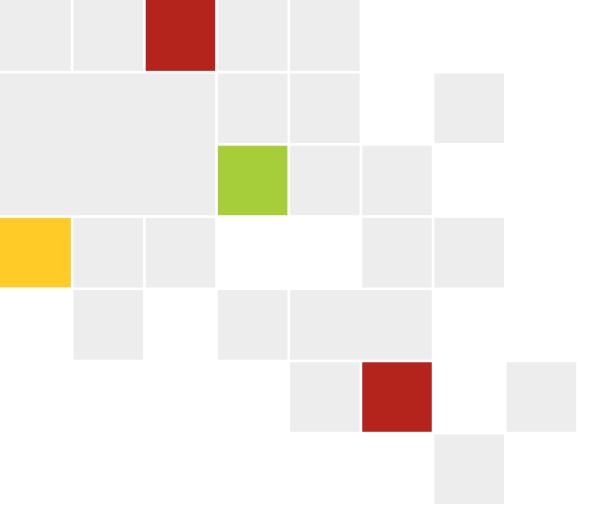
Reference	Proposal	Decision
16/2623/FUL	Proposal for the installation of white UPPVC windows to two elevations of the Mill building.	No Further Action be Taken 19/12/2017
15/1512/VRC	Variation of condition U73026 (DV48 Approved Drawings) of planning permission 14/0735/FUL dated 9 July 2014 to allow enlargement of lift over run, replacement of existing zinc coping to aluminium coping to the existing castle effect parapet to front, side and rear elevations and insertion of a door to southwestern (side) elevation to allow service access to members bar terrace area.	Granted Permission 09/07/2015
15/1520/FUL	Installation of awning above third windows/doors on south eastern elevation (The Barons frontage) and the installation of cable balustrade between castle effect parapet to third floor of the Admin building.	Granted Permission 17/06/2015
14/0735/DD04	Details pursuant to condition U73028 - Further Plan of planning permission 14/0735/FUL dated 9 July 2014.	Granted Permission 09/07/2015
14/0735/DD01	Details pursuant to condition U73029 - Details of Doors and Windows of planning permission 14/0735/FUL.	Granted Permission 05/02/2015
14/0735/DD03	Details pursuant to condition BD12 - Details - Materials to be approved of planning permission 14/0735/FUL.	Granted Permission 05/02/2015
14/0735/DD02	Details pursuant to condition U73027 - Details of Screen of planning permission 14/0735/FUL.	Granted Permission 05/02/2015
14/0735/FUL	Erection of extensions at third floor level (following removal of zinc screened tank room) and elevational changes (front, side and rear) to the administration building; second floor extension to Stage 2 and 3 building.	Granted Permission 09/07/2014
14/0736/ADV	Proposed non-illuminated 'Twickenham Studios' signage to end flank wall of 116 St Margarets Road; large scale painted numbering to three stage (1, 2 and 3) buildings.	Granted Permission 22/09/2014

98/2166	Pole Antennae Fixed To Existing Structure And Equipment Housing.	Permission not required 06/10/1998
95/1424/FUL	Complete Refurbishment Of Existing Dressing Rooms And Ancillary Accommodation To Sound Stage 1 Including New External Walls And Raising And Fitting New Roof And New Bridge Link.	Granted Permission 30/06/1995
93/0085/FUL	Erection Of An Additional Floor To Existing 3 Storey Office Block To Provide 2 No Additional Offices.	Granted Permission 28/05/1993
91/0499/FUL	Part Ground,part Two Storey Rear Extension.	Granted Permission 09/05/1991
90/0435/DD01	Details Pursuant To Condition (b) (staircase) Of Planning Permission 90/0435 Dated 21/5/90.	Granted Permission 30/01/1991
90/0435/FUL	Two Storey Front Extension To Restaurant.	Granted Permission 21/05/1990
86/0806	Erection of gate, screen wall and security gate house.	Granted Permission 27/06/1986
85/0923	Erection of part three storey part four storey building comprising car parking, cutting rooms, dubbing and post-syne theatres and offices. (Plan Nos. GJ1/BR2 Rev.2 amended on 2nd August 1985).	Granted Permission 18/09/1985
84/1187/DD01	The demolition of the existing warehouse building and the erection of a new building containing new sound studios and cutting rooms, and 31 parking spaces. (Detailed Drawings - Materials). Condition No. 3 of planning permission 84/1187 dated 17.12.84.	Granted Permission 21/06/1985
80/1571/ADV	For Advertisements.	Granted Permission 19/01/1981

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80/0601	Erection of a two storey office building, involving the demolition of existing single storey office and toilet block and the provision of additional car parking adjacent to service road on the northern boundary.	Granted Permission 10/12/1980
77/1160/DD01	Erection of a two storey building for use as cutting rooms and offices, including the provision of two external fire escape staircases. (Detailed drawings tree planting and landscaping). Condition No. 42 of planning permission 77/1160 dated 15/3/78.	Granted Permission 10/01/1979
78/1402	Erection of single storey toilet block for male and female staff.	Granted Permission 24/01/1979
78/0869	Demolition of four garages, the erection of six new garages and the relocation of six existing spaces with the widening of the existing access road.	Granted Permission 31/05/1979
77/1160	Erection of a two storey building for use as cutting rooms and offices, including the provision of two external fire escape staircases.	Granted Permission 15/03/1978
77/0439	The erection of a single storey building comprising ten cutting rooms, involving the demolition of existing temporary buildings together with the formation of car parking area.	Granted Permission 30/08/1977
72/3440	Demolition of existing buildings and erection of three-storey block of offices over semi-basement car park; provision of 22 parking spaces.	Granted Permission 22/11/1973
67/1226/DD01	Erection of temporary workshop and offices. Condition No. (a) of planning permission 67/1226 dated 21st August, 1967.	20/10/1967
67/1227	Demolition of existing workshop and erection of two-storey workshop, four-storey block of offices and provision of 66 car parking spaces.	Granted Permission 03/01/1968
67/1226	Erection of temporary workshops and offices.	Granted Permission 21/08/1967
65/0015	Addition to existing building for cutting room facilities.	Granted Permission 19/02/1995

59/1018	Erection of re-recording and music scoring theatre and ancillary block.	Granted Permission 30/11/1959
59/0195/DD01	Erection of new stage, viewing and dubbing theatre, and property store. Condition No. (a) of planning permission 0195/59 dated 28th May, 1959.	Granted Permission 30/10/1959
59/0195	Erection of new stage, viewing and dubbing theatre, and property store.	28/05/1959
47/8883	Erection of a new sound departmental building.	Granted Permission 30/01/1958
47/8041	The use of two Nissen huts for light engineering purposes and the use of the office block for clerical purposes.	Granted Permission 11/06/1957
47/6394	The erection of boiler house.	Granted Permission 25/08/1995
47/6151	The erection of dressing room block.	Granted Permission 22/06/1955
47/5338	Erection of brick building for administration purposes.	Granted Permission 04/10/1954
47/5309	The erection of a temporary building.	Granted Permission 04/10/1954
47/5168	Retention of nissen hut for use as canteen.	Granted Permission 27/07/1954
47/3664	Erection of nissen hut.	Granted Permission 20/11/1952
47/3576	Erection of nissen hut.	Granted Permission 24/10/1952

47/2743	The use of the existing premises for light engineering work involving the manufacture of radar equipment.	Granted Permission 21/11/1951
47/0604	The erection of Nissen huts as temporary workshops and stores and the provision of a temporary covered way.	Granted Permission 14/04/1949





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