

## Technical Note

Project: Twickenham Riverside

Date: 21.02.2022

Subject: **Response to planning officers' comments**

Revision: P01

Notes:

### 1. Retail space

We have provided provision for a shared WC and shower off the Ground Floor corridor, but feedback from the commercial letting agents Avison Young suggests that the individual operators are likely to want their own WCs as part of their back-of-house provision. The advice we have received is that the service charge should be reduced as much as possible to make the units more desirable to potential tenants. It was also felt that using cleaning rotas between the tenants as a means to reduce the service charge is unlikely to be successful, resulting in poorly maintained spaces.

The advice we have received is that the market prefers the retail units to be 'shell only', so back-of-house facilities, including storage and WCs, are to be designed by the fit-out contractors to suit the needs of the individual operators. Avison Young are not concerned by the sizes of the retail spaces provided in the Water Lane building, which are sized accordingly to attract the boutique style businesses, similar to those operating on Church Street. The design does however allow for flexibility to remove the partitions between units, should a larger unit be required, as has been done for a few of the units on Church Street, including Limpopo Biltong & Butchers (see below).

As a comparison, the retail units in the Water Lane building are larger than many of the units on Church Street, as can be seen below: -

#### **Water Lane building** (excluding kiosk)

- Unit 1 (northern-most unit): 130 sq.m
- Unit 2: 55 sq.m
- Unit 3: 55 sq.m
- Unit 4: 55 sq.m
- Unit 5: 55 sq.m

#### **Church Street**

according to the Valuation Office Agency, the properties have the following areas:

- 12 Church Street (Shoe repairs): 32.98 sq.m
- 13 Church Street (Rosie Chai): 24.5 sq.m
- 14 Church Street (Pet Boutique): 29.52 sq.m
- 16 Church Street: 74.9 sq.m (2 units)
- 43 Church Street (Mojo): 86.5 sq.m (incl. basement storage)
- 44-45 Church Street (Limpopo Biltong & Butchers): 131.6 sq.m (2 units, incl. basement storage)

## 2. River activity space

The west end of the embankment where the riverside activity space is located is a pedestrian priority area with a raised table, for which the TA predicts a low usage for vehicular activity. Refer to SK-246 which shows the usage of the space for turning the largest vehicle anticipated, a 7.5T box van. Larger vehicles such as refuse or emergency vehicles will exit Wharf Lane via the embankment.

As can be seen on the sketch, there is sufficient space to the north of the box van's turning manoeuvre, for those using the boathouse lockers and changing area to do so safely.

Activation to the west of the flood defence wall is not feasible as this sits in Flood Zone 3 so may only be used for water compatible development. The rain garden in this area is also necessary to meet the EA's flood storage requirements, and if this was to be lost, the storage would need to be reprovided elsewhere on the site at the same level AOD. The raingarden provides biodiversity opportunities on Wharf Lane. There are future plans to bring the Victorian Thames Eyot Boathouse back into operation, which will provide further activation to the western end of the embankment.

Locations of riparian lifesaving equipment can be found on LDA Design's General Arrangement Landscape Plan (dwg. no. 6975\_100).

## 3. Floating pontoon

A mooring survey has been completed which shows a low usage of the existing mooring points, and records that within the surveyed period no two mooring points were used at once. As can be seen on SK-245, the proposal restricts the use of one mooring point by the ecology baskets, but keeps two in operation as well as the steps to the west. There is also flexibility to move the pontoon east if required to give more space to the western-most mooring point.

## 4. Design – site wide matters

In response to point c), find attached sections through Water Lane and Wharf Lane extending to include Eel Pie Island, based on the limited survey information we have for the island (refer to SK-243).

## 5. Design - Water Lane building

a) Further to comments made in respect of doors opening onto the highway, we have reviewed the doors on the west elevation of the Water Lane building and provide the following commentary: -

- **Café deliveries:** We will replace the café deliveries door with an inward opening door.
- **Retail deliveries and refuse and residential refuse:** The doors to the north of the lift are suitably set-back to not interfere with the highway.

- **Substation:** It is a requirement that substation doors open outwards. The usage of these doors is extremely infrequent, and many of the below points raised for the café refuse store are also relevant.
- **Residential fire escape:** The escape door to the stair must open out in the direction of escape in accordance with Approved Document B.
- **Café refuse store:** It is noted through the comments made that bin store doors should not open outwards over a public highway or road which is understood to be in line with section 3.1 of the LBRuT Refuse and Recycling Storage Requirements SPD (April 2015).

The following summary points of justification are made with respect to the current proposed refuse store designs:

- **Design & practical use:** The bin store design does not facilitate people being inside the store, and then opening the doors from within as they are too small.
- **Management and safe operation:** The external refuse doors will not be managed and operated by residential tenants but instead will be operated by trained café maintenance / facilities staff familiar with their environment or refuse collection operatives.
- **Footfall:** Footfall along the immediate pavement areas is expected to be low, with the footways in proximity of the refuse store not within a natural pedestrian desire line to the main masterplan areas (including the café and gardens) and therefore not expected to experience any significant level of pedestrian activity, and not opening out onto an area where pedestrians will be gathering. There is also no footpath at the south side of the service road beyond this point.
- **Infrequency of operation:** Occurrence of refuse collection will be very infrequent across the weekly operation of the site, further limiting the number of occasions that the doors will be opened externally.
- **Infrequency of vehicle activity:** Pedestrian and vehicle visibility along the service road is good, and vehicle trips will be low. Therefore, if a pedestrian is accessing / egressing the Water Lane building to the west whilst the doors are open, visibility of any vehicles parked or utilising the turning head will be good.

b) The set-back to the east elevation provides shelter as is required by Approved Document M for principal communal entrances to M(4) 3 flats. The recess has been discussed with the project's security consultant SGW who have produced a Security Needs Assessment based on the Police Designing Out Crime Officer's comments, making references to providing good lighting and CCTV coverage for doors with limited visibility.

c) As can be seen on SK-244, there are a series of recesses and set-backs to the west elevation, which, viewed alongside the north gable end to the café, provide a visually engaging elevation.

The rear doors are circa 2.5m in height as per all other external doors for the Water Lane building.

d) Whilst originally looking at incorporating recesses below the Water Lane building's windows, these were removed some time ago, as it required the external wall build-ups to be increased to get the detail to work. This would have taken the GIAs of many of the flats below the minimum standards set by the 'Technical housing standards – nationally described space standards'. The detail below the first-floor windows on King Street is therefore consistent with the Water Lane elevation, as neither have recesses below the windows.

e) The typical bay drawings have been amended and split across 2 sheets to include typical bay sections alongside the elevations (refer to drawings 2695 and 2696).

## **6. Wharf Lane**

- a) The winter garden was lost as a means of maintaining flood storage to meet the EA's requirements. This is explained in further detail on pages 45-48 of the DAS.
- b) The flank balconies have not been enclosed to create private winter gardens for three primary reasons: -
- Both LBRuT's Supplementary Planning Document Residential Development Standards and the New London Plan suggest that private amenity space should be located externally.
  - Enclosing the balconies with glazing will create overheating concerns for spaces of such as small size.
  - The planning officers have previously raised concerns about the flatness of parts of the Wharf Lane façade. The presence of recessed balconies creates more variety and depth to these areas.
- c) In early Pre-App meetings, a scheme with metal cladding was presented to the planning officers. Brick panels were introduced in lieu of this, reducing the quantity of metal panels considerably. The only aluminium panels still present on the Wharf Lane building clad the gastro pub/restaurant kitchen and the bin store on the west elevation of the ground floor. There is also zinc cladding behind the brise soleil on the top floors of the gable ends, but this forms a small portion of the overall cladding area, is at high level and is partially masked by the brise soleil.

## **7. Residential standards**

It is unclear where the requirement for 75% of the floor area to have a ceiling height above 2.5m comes from. However, we note the following requirement from 'Technical housing standards – nationally described space standards', and have measured the scheme against this: -

'the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area'

As can be observed in the amended Residential Standards Schedule (TRS-HAL-XX-XX-SH-A-9550), all flats except for two market flats on Level 4 of the Wharf Lane building comply with this. The two flats in question are marginally below the recommendation, but as with other top floor flats, both have a large proportion of the ceiling at a height of 2.95m. We therefore believe that these flats will have a spacious feeling to them. The only ways to bring them in compliance with the guidance are to increase the height of the building or to decrease the GIA of these flats by removing some of the area from the edges, neither of which we feel are appropriate.

## **8. Residential amenity – visual impact**

At Pre-Application stage, plans and sections comparing the positioning and height of the Water Lane building against the existing buildings and previous CJCT scheme were provided to the planning officers (these have also been included on pages 130 - 132 of the DAS). A request was made that the King Street gable end should not project any further than the building line of the existing parade, and this relationship can be observed on page 132 of the DAS. Concerns over the massing of the rear elevation weren't expressed until after the planning submission, but notwithstanding this, please refer to the below justification:

- Two further sections have been completed close to the rear windows of the adjacent building, which have been attached (refer to SK-247 and SK-248 for the sections and SK-249 for a plan of where the sections are cut). Although it is acknowledged that the massing follows the boundary line and steps inboard slightly further south than the previous CJCT scheme, the Water Lane Building is significantly lower than the previous scheme along this western boundary edge.

- Refer to pages 75 and 76 of the 'Impact on Neighbouring Properties Report: Appendices' submitted with the application (17085\_2021\_0315\_DaySun\_Impact\_Internals\_Report\_Part 1a) which shows that there is no significant reduction in light to these two neighbouring rooms closest to the plant room.

- The length of the plant room against the boundary is an improvement on the scheme presented in the Pre-Application meeting on Friday 20<sup>th</sup> November 2020. The current plant room placement was presented on Wednesday 24<sup>th</sup> February 2021. At this meeting, and the number of Pre-Application meetings that followed this, the massing of the plant room was not raised as a concern.