

24 February 2022



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By email.

Dear Lucy,

**Twickenham Riverside  
 Response to Additional Officer Comments**

This letter seeks to provide a response to additional queries via email dated 4 February 2022. This email sought clarification on a number of matters from highways and flooding, sustainability, residential standards and more. The table below sets out the issue(s) raised by officers followed by the Applicant’s response.

Officer Comment	Applicant Response
<b>Flooding</b>	
Flooding – Officers requested a revised Flood Risk Assessment and Flood Emergency Plan be provided. Officers will wait until all amendments / additional information has been provided before reconsulting on new information.	The Applicant team issued a revised Flood Risk Assessment, Flood Emergency Plan and supplementary/explanatory note on 26 January 2022. We believe we have now provided all outstanding information and I refer you back to the revised FRA, Flood Emergency Plan and supplementary note, re-issued for ease.
<b>Highways</b>	
Highway Matters	A detailed Highways note was issued to officers on 20 December 2021. We consider the information now with officers is capable of being reconsulted on.
<b>Retail Space</b>	
Officers requested the need to demonstrate the space is usable.	There are a number of surrounding retail properties of similar sizes along Church Street that can be used as precedent. The list below demonstrates nearby examples of small-sized units that are viably in use: <ul style="list-style-type: none"> <li>• 12 Church Street (Shoe repairs) – Ground floor A+B <b>32.98sqm</b></li> <li>• 13 Church Street TW1 3NJ (Rosie Chai) – Ground floor sales <b>24.5sqm</b></li> <li>• 14 Church Street TW1 3NJ (Pet Boutique) – Ground floor sales and storage <b>29.52sqm</b></li> <li>• 16 Church Street – (2 units) retail zones, zones a + b + c <b>74.9sqm</b></li> </ul>

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	<ul style="list-style-type: none"> <li>• 43 Church Street TW1 3NR (Mojo) – Ground floor sales and storage plus basement storage <b>86.5sqm</b></li> <li>• 44-45 Church Street TW1 3NT (Limpopo Biltong &amp; Butchers) – Ground floor sales and office plus basement storage <b>131.6sqm</b></li> </ul> <p>Please see section 1 of the Hopkins Technical Note for further detail.</p>
<b>River Activity Zone</b>	
<p>Changing area and 3 lockers are within turning area, therefore potentially conflicting with bikes, pedestrians, cars. It must be demonstrated how all these activities can function safely.</p>	<p>Please see drawing TRS-HAL-01-B1-DR-A-SK-246-P01-220211. See section 2 of the Hopkins Technical Note for further detail.</p>
<p>Details and location of the proposed Riparian lifesaving equipment are to be provided.</p>	<p>Details of Riparian lifesaving equipment have been previously provided within the supplementary Landscape technical package, issued on LDA's Design's General Arrangement Landscape Plan (dwg no. 697_100). Please see section 2 of the Hopkins Technical Note.</p>
<b>Floating Pontoon</b>	
<p>Local Plan Policy LP19 requires development to not interfere with the recreational use of the river. However, no information has been provided to allow officers to determine how the scheme will impact upon moorings.</p>	<p>Please see drawing TRS-HAL-01-B1-DR-A-SK-245-P01-220211 for details of the floating pontoon. This illustrates the floating pontoons will allow mooring opportunities. Also see section 3 of the Hopkins Technical note.</p>
<p>Piling is an operational decision, and no details of the piles (design, size and location) have been provided in regard to the impact of the pontoon on moorings.</p>	<p>We consider it reasonable for a piling condition to be attached to the development, subject to receiving planning permission. These details would be required to be submitted and approved pre-commencement of works associated with the pontoon. This allows the LPA to retain the appropriate level of control over the design and impact of the piling strategy. Please see submitted moorings survey.</p>
<b>Open Space</b>	
<p>The Applicant should provide the definition to open space in the London Plan.</p>	<p>Page 514 of the London Plan (2021) states:</p> <p><i>“All land in London that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted.”</i></p>

Requested a consistent approach between the calculation inputs into existing and proposed open space at the site.	Please see “DAS_MOL_Slide” prepared by LDA for details.
Sought clarification on quantum of hard and soft landscaping	
<b>Diamond Jubilee Gardens</b>	
Sought clarification on the quantum of existing and proposed hard and soft landscaped areas. Requested breakdown of existing and proposed furniture.	Please see drawing “DAS_MOL_Slide”, as above for hard/soft landscaping details. Please see Seating Slide drawing (prepared by LDA) for illustration of linear meterage of existing and proposed furniture/benches.
Requested further information on frequency of flooding on areas floodable.	We have designed for current predicted fluvial flood events including appropriate climate change buffers applied. The upper gardens in the proposed development remain outside the flood zone and will be protected behind the flood defence wall. Please see the revised Flood Risk Assessment submitted to officers on 26 January 2022.
Requested further detail on potential uses for the Town Square.	Please see event spaces study/precedent issued to officers in the original Design and Access Statement.
<b>Affordable Housing</b>	
The rented affordable housing product is London Affordable Rent. It is not clear whether grant funding has been attached to, given the GLA is now only grants funding to social rented products.	The applicant has met with both the GLA and PA Housing in recent weeks to confirm that the GLA are still willing to fund the scheme through the current grant funding round or, if necessary, through the new grant funding round. PA housing has an indicative amount of funding for schemes in the new grant funding round and have indicated that they would be willing to support the scheme with the same grant amounts and same offer. However it does need to made clear in the Planning report that the scheme is not viable without the GLA grant funding, so that we can lever the funding in should it move into the new round of grant funding. We request that the LPA makes this very clear in the report
Noted a reduction in affordable housing cannot be executed through a deed of variation.	Noted.
<b>Wheelchair Housing</b>	
One lift in the Wharf Lane building requires a robust maintenance plan. Housing colleagues are not supportive of the marketing of the private sale Category 3 units due to the single lift.	Housing colleagues have previously stated they would be prepared to condition this and we have accepted this position.
<b>Town Square</b>	

Requested seating information.	Detailed plans/drawings illustrating seating design were issued in Trees Technical Note and Landscape Supporting Technical Drawings on 20 December 2021 issue to officers. These drawings show terraced timber seating surrounding Town Square and benches surrounding planting on the riverside. These have been reissued for ease for reference.
Requested lighting information.	A Light Spillage Plan was issued to officers in August 2021. This drawing illustrates illumination (lux levels) for the proposed design. Lighting layouts were also included in the planning submission. Please see the reissued drawing for ease. A detailed lighting strategy can be secured through condition.
<b>Heritage Elements</b>	
The Applicant should consider opportunities for public art. A plaque to identify the location/history of the listed boathouse, for example.	The Applicant remains open in principle to public art installations at appropriate locations in the Proposed Development. However, there is currently a potential scheme for Thames Eyot and any proposal for public art should be done in accordance with that scheme whenever it is brought forward. Options for public art can be pursued outside of this planning application in consultation with the local community and stakeholders and the Council's Parks services.  Please see Heritage Slide (prepared by LDA) for
<b>Metropolitan Open Land</b>	
The applicant should provide existing and proposed areas of hard surfacing in MOL.	Please see revised Metropolitan Open Land slide for comparison.
<b>Sitewide Design Matters</b>	
Noted no details of store provided and these are necessary.	Further details of this small structure and associated screening can be secured by condition.
Requested section through to Eel Pie Island for context with wharf on the Island	Please see section 4 of the Hopkins Technical Note.
<b>Water Lane Building Design Matters</b>	
Doors at the rear must be inward opening unless these do not encroach onto public highway/footway. Sought confirmation that the proposals met the Secure By Design standard. Suggested the West façade is too blank and recommended additional materials/detailing. Sought confirmation the rear doors are below 2m	Please see section 5 of the Hopkins Technical Note for Applicant response to these points.

Recommended detailing be introduced at the King Street elevation, below the 1 <sup>st</sup> floor windows to elongate the building.	
Requested section through the elevation.	
<b>Wharf Lane Design Matters</b>	
Requested an explanation for the loss of the wintergardens.	Please see section 6 of the Hopkins Technical Note for greater detail.
Noted too much metal on the building and this needs softening.	The only proposed metal is the proposed zinc roof and roof-detailing and the rain-screen on the ground floor. Please see section 6 of the Hopkins Technical Note for greater detail.
<b>Residential Standards</b>	
Sought clarity regarding the height of the units – specifically the need to demonstrate that 75% of the floor area is over	Please see section 7 of the Hopkins Technical Note for further detail.
<b>Residential Amenity – Visual Impact</b>	
Compared to the pre-application stage, the planning submission has worsened the relationship, with the plant room now immediately adjacent to windows past the adjacent properties; and suggested if the plant room can be sited to the rear of the building to be site	Please see section 8 of the Hopkins Technical Note.
<b>Sustainability</b>	
The non-residential element must meet a 15% reduction. The energy efficiency only equates to 12%.	<p>Improvements have been made on all passive and active energy design measures with improved U-values and equipment efficiencies compared to the notional.</p> <p>The model falls short as a result of much higher glazing ratios compared to the notional building, which typically uses a glazing ratio of 40% of the exposed façade area. The choice to increase glazing levels was a design decision to prioritise good daylight levels within the commercial areas and to promote views across the embankment and Diamond Jubilee Gardens.</p> <p>Fabric u-values have been reduced to reasonable figures given these constraints and a glazing g-value that provides a balance between solar gains and light transmittance has been selected.</p>
The applicant should confirm CO2 reduction through PV panels.	The PV panels provide a site-wide CO2 saving of 2.65 tonnes per annum.
Details of how future district energy connections will be achieved should be provided.	This has been issued previously by the Applicant. We have resubmitted for ease.
Stated a site-wide carbon offset payment of £123,892.	The applicant acknowledges this.

<p>The applicant should provide compliance with TM59 criteria (DSY2 and DSY3) by investigating further mitigation measures (enhanced solar control glazing &amp; retrofit additional brise soleil) for the residential and the non-residential developments).</p>	<p>We have already demonstrated we've complied with the TM59 overheating criteria for DSY1. DSY 2 &amp; 3 are onerous design summer years intended to test extreme summers and we wouldn't typically be expected to demonstrate compliance with these.</p>
<b>Public Realm</b>	
<p>During the pre-application scheme, the public realm was previously labelled as high quality stone paving. Within the submission, asphalt is now proposed in Water Lane/Wharf Lane. This is an issue and a departure to the site allocation in the Twickenham Area Action Plan.</p>	<p>The submitted plans show the proposals for which we are seeking planning permission. The scheme provides generous footway on Water Lane achieved through a set back of the building line and the surfacing and planting strategy helps deliver a high quality of public realm. Water Lane will be subject to vehicular movements to allow for servicing and access to Eel Pie Island, the surfacing on the carriageway will need to be robust enough in order to accommodate this demand. On balance therefore, a distinction between carriageway and footway allows for the creation of a safe and pedestrian friendly footway while also delivering a safe and operational carriageway.</p>
<p>The drawings are also inconsistent with page 63 of the Design &amp; Access Statement, which states '<i>The high quality stone paving used in Church Lane (sic) will continue down Water Lane to create a single connected public space</i>'.</p>	<p>The Design &amp; Access Statement has been updated accordingly. Please see submitted document.</p>
<p>There remains a lack of detail on street furniture</p>	<p>Please see submitted seating plan prepared by LDA Design.</p>
<p>The western end of the Riverside access road should be celebrated more with landscaping and public realm improvements.</p>	<p>This has been previously addressed.</p>
<b>Pedestrian Circulation Routes</b>	
<p>Regarding cycle parking, noted there is a need for appropriate materials in the flooding zones.</p>	<p>We can confirm all bicycle stands are stainless steel.</p>
<b>Landscape</b>	
<p>The applicant should provide further highway detail, particularly the impact on the Oak tree at the top of Water Lane.</p>	<p>Please see drawing 6795_hardwork_details_400_series_RevC prepared by LDA.</p>
<p>The low wall on Water Lane is inconsistent with page 66 of the Design &amp; Access Statement.</p>	<p>Noted. There is an error on the CGI but the drawing is correct.</p>
<b>Ecology</b>	
<p>Noted the application provides the Twickenham Riverside Ecosystem Design Pack, this does not provide detail of species, maintenance or management regimes.</p>	<p>In addition to the Twickenham Ecosystem Design Pack, please see the following:</p> <ul style="list-style-type: none"> <li>• Twickenham Riverside Planting List;</li> <li>• Biomatrix Plant List Guide (2021-2022); and</li> <li>• Floating Ecosystems Maintenance, Monitoring &amp; Engagement</li> </ul>



Should you have any queries regarding the above please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink that reads "Savills".

**Jodane Walters MRTPI  
Planner**