
Twickenham Riverside

Planning Statement Supplementary Note

1 Introduction

1.1 Following consultation with the LPA, statutory consultees and local residents, this note is intended to supplement the submitted Planning Statement. It provides a summary of the material considerations the LPA ought to weigh in the planning balance when considering policy LP21 and the outcomes of the sequential test.

2 Policy context

2.1 The Site partially lies within Flood Zone 2, Flood Zone 3a and Flood Zone 3b. This means the Proposed Development is vulnerable to flooding from the River Thames but is in an area benefitting from flood defences to mitigate risk of flooding. As a result of the Site's location within Flood Zones 2, 3a and 3b, a Flood Risk Assessment ('FRA') was submitted in support of the planning application in August 2021.

2.2 Paragraph 159 of the National Planning Policy Framework ('NPPF') seeks to steer development away from areas at high risk of flooding. Paragraph 161 requires development plans to apply a sequential, risk-based approach to the location of development by applying the sequential test and then, if necessary, the exception test.

2.3 Paragraph 166 of the NPPF states that where planning applications are brought forward on sites allocated in the development plan through the sequential test, applicants need not reapply the sequential test.

2.4 LBRuT Policy LP21 (Flood Risk and Sustainable Drainage) requires all development to avoid or minimise its contribution to all sources of flooding including fluvial, tidal or surface water among others, accounting for climate change and without increasing flood risk elsewhere. Development will be guided to areas of lower risk by applying the 'Sequential Test' as set out national policy guidance, and where necessary the 'Exception Test' will be applied.

2.5 Flood Zone 3b is identified in the Council's Strategic Flood Risk Assessment as the functional floodplain. The policy states that the floodplain will be protected by not permitting any form of development on undeveloped sites unless it is for Water Compatible development or essential utility infrastructure. Redevelopment of existing developed sites will only be supported if there is no intensification of the land use and a net flood risk reduction is proposed.

2.6 In Flood Zone 3a, policy LP21 states that land uses are restricted to Water Compatible, Less Vulnerable and More Vulnerable development. Highly vulnerable developments will not be permitted. A Sequential Test is required for all developments in Flood Zone 3a unless exceptions outlined in the justifications apply.

2.7 In Flood Zone 2 and Flood Zone 1 there are no land use restrictions.

2.8 Table 3 in the Flood Risk and Coastal Change chapter of the PPG identifies that "More Vulnerable" uses such as housing and "Less Vulnerable" uses such as shops, offices and restaurants should not be permitted in Flood Zone 3b but are appropriate in Flood Zones 1 and 2. "Highly Vulnerable" uses should not be permitted in Flood Zone 3a and an exception test is required for "More Vulnerable" uses.

3 The application site

3.1 As identified in the images below, the existing site is located within Flood Zone 2 (light blue) and Flood Zone 3a (light pink) and Flood Zone 3b (dark pink).



Existing Site – Flood Zone 2 (flood defence line in dark blue)



Existing Site – Flood Zones 3a (light pink) and 3b (dark pink)

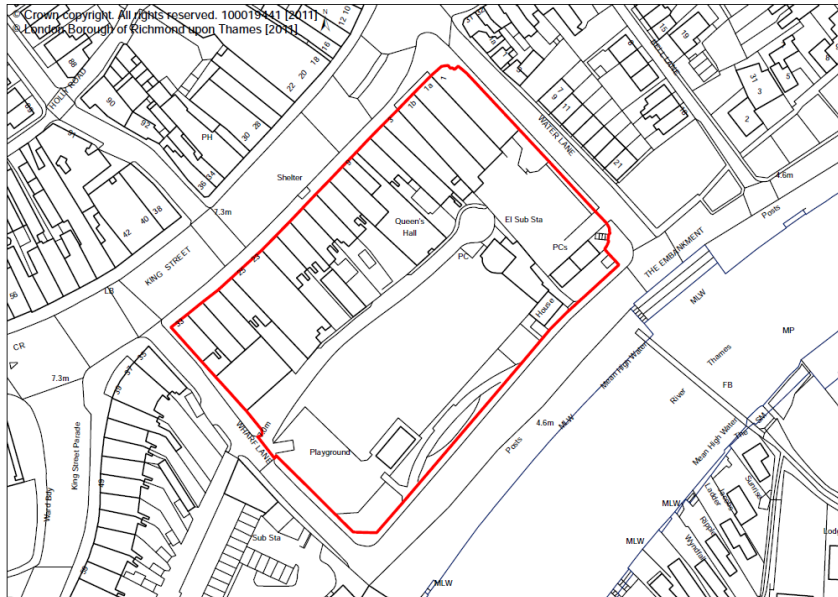
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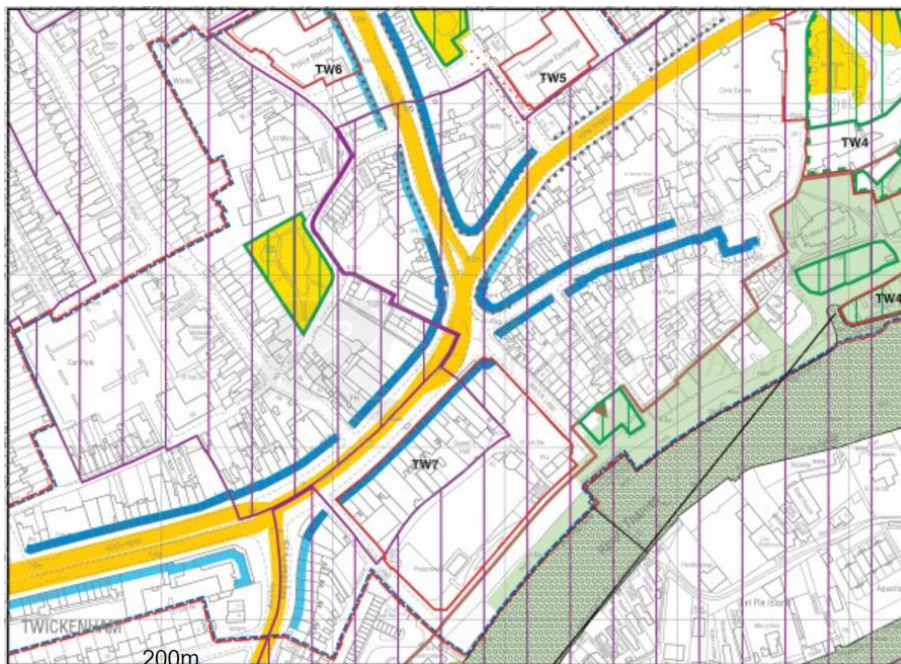


3.2 In terms of strategic allocations, the application site forms part of the TW7 Twickenham Riverside Proposal Site as identified in the adopted Twickenham Area Action Plan.



TW7 Twickenham Riverside (former pool site) and south King Street proposal site

3.3 The application site is also located within Twickenham Main Town Centre.



Twickenham Town Centre (boundary shown in the blue dashed line)

- 3.4 The diagram below overlays the TW7 proposal site boundary and Flood Zones 2 and 3 on top of the proposed development.



Overlay of the TW7 boundary and flood zones over the proposed development

- 3.5 There is an area in the southeast corner of the proposed development which falls outside of the TW7 proposal site which has been sequentially tested shown in the area marked by an orange line.
- 3.6 As this small area falls outside of the sequentially tested site boundary, we have been asked to carry out a sequential test, details of which are set out in the accompanying update to the Flood Risk Assessment by Webb Yates. A search for alternative reasonably available and developable sites has been undertaken. No alternative sites have been found that are capable of delivering this development which is intrinsically linked to its riverside setting.
- 3.7 However, since the development theoretically could be reconfigured and the Wharf Lane building relocated to fall within the TW7 proposal site boundary, this development would not pass the sequential test and as such would not undergo an exceptions test. Nonetheless the rearrangement of the buildings would have detrimental effect on the development and despite failing the sequential test there are still a number of reasons why this development should still be considered to be appropriate in this location having regard to paragraph 167 of the NPPF. Further detail is set out in the accompanying Flood Risk Assessment.
- 3.8 In addition to these reasons, and in considering the wider planning balance, we wish to draw attention to other material planning considerations relevant to the proposed development that ought to be given weight.

4 Realignment of the flood defence wall and re-classification of flood zones in the proposed scheme

4.1 The Proposed Development was designed in consultation with the Environment Agency to provide sufficient protection and appropriate setbacks from the flood wall and adequate flood water storage on-site. This includes the realignment of the existing flood wall and setting back of buildings with “More Vulnerable” and “Less Vulnerable” uses by 4 metres. The image below illustrates the proposed flood defence wall.



Proposed re-alignment of the flood defence wall

4.2 The realigned flood defence wall will provide protection from flooding equal to or greater than the Thames Estuary 2100 defence level of 6.90m. This alters the topography of the Site such that the core area of the Proposed Development whereby the “More Vulnerable” and “Less Vulnerable” uses are located, lies within Flood Zone 1. This reclassification occurs without reducing the available flood volume on site.

4.3 The proposed new flood defence wall is an integral part of the scheme and will be constructed as part of the first phase of works. The Council may wish to consider the use of a Grampian condition or planning obligation to secure delivery of the new flood defence wall prior to the occupation of vulnerable uses.

4.4 See paragraphs 7.71-7.83 of the Planning Statement (August 2021) for further detail on the benefits of the realigned flood defence wall.

5 Exemptions for development within a main town centre boundary

5.1 The site is located in a Main Town Centre. In accordance with paragraph 6.2.2 of the Local Plan and section 6.2 of the Council's Strategic Flood Risk Assessment, development in Flood Zone 3 and 2 is exempt from the requirement for a Sequential Test. Paragraph 6.2.2 sets out a number of other circumstances where an exemption from a sequential test will apply. These include where a site is a Local Plan proposal site that has already been sequentially tested. The boundary of the application site extends beyond that of the TW7 proposal site, meaning that this exemption does not apply. However, paragraph 6.2.2 clarifies that only one of the exemptions needs to apply. In this case, the qualifying exemption is the location of the site within a main centre boundary.

6 Local circumstances

6.1 In addition to the re-classification of the flood zones through the delivery of a new flood defence wall, in considering flooding matters, the Council ought to also give due regard to a number of local circumstances relating to the wider catchment area as set out in paragraph 033 of the PPG (Ref ID: 7-033020140306).

Making best use of previously developed land

6.2 The application seeks to make best use of previously developed brownfield land in a sustainable, highly accessible town centre location which is consistent with paragraph 119 of the NPPF which states:

"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land" (Paragraph 119, NPPF).

6.3 Good Growth Principle GG2 in the London Plan also promotes a brownfield, town-centre first approach stating that planning and development must:

"enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites (Good Growth Principle 2, the London Plan)."

Meeting objectively assessed housing and employment need

6.4 The application seeks to accommodate objectively assessed housing and employment needs in a way that makes best use of highly accessible brownfield land. The Local Plan at policy LP34 sets out that the borough's housing targets over the plan period will be met in part through the delivery of approximately 1000 and 1050 new homes in Twickenham.

6.5 The proposed development helps to meet this need by delivering 45 new homes in total, with 24 homes being private tenure and 21 homes being affordable. The proposed development delivers a 50:50 split between private and affordable housing (by habitable rooms). The proposed development will also deliver 5 homes as wheelchair accessible/adaptable homes (equating to 10%) in line with relevant Building Regulations.

6.7 The delivery of housing and affordable housing is a key central and regional government strategic target as emphasised across all layers of planning policy: the NPPF, the London Plan (2021) and the Local Plan (2018). Although London Borough of Richmond upon Thames has passed the Government's Housing Delivery Test (2021) – i.e., met local housing need over the previous 3-year period (incl. a Covid-19 allowance); London remains a single housing market and local contributions are important to London-wide delivery.

6.8 The proposed development also replaces existing office floorspace to meet local need for employment floorspace in accordance with policy LP41 in the Local Plan. This states that there is a presumption against the loss of office floorspace in all parts of the borough.

Uses that sustain the existing community

6.8 The application seeks to provide employment, leisure and retail uses to promote vitality and regeneration in Twickenham Town Centre and sustain the existing community. This includes the re-provision of the existing Diamond Jubilee Gardens public open space.

Regeneration of a derelict town centre site

6.9 The application seeks to bring this derelict site back into active use, taking advantage of its riverside location and improving links between this area and the core of the town centre in alignment with the Twickenham Area Action Plan (TAAP).

6.10 The TAAP identifies key objectives for the Site which the proposed development delivers against. These objectives and related outcomes in the proposed scheme are intrinsically linked to the site and can only be realised in this location. They include:

- Creation of a destination and unique riverside setting in this location
- Creation of new open space to provide for a wide range of open uses, including on the former pool site and in the form of civic space/event space on the Embankment
- Maintenance of the Embankment as a working quay
- Improvements to Water Lane and Wharf Lane as links between the town centre and river front
- New retail uses on Water Lane

7 Summary

7.1 A Sequential Test exercise has been undertaken to address a small portion of the application site that falls outside of the boundary of the TW7 Twickenham Riverside Proposal Site and proposed vulnerable uses.

7.2 The Sequential Test has found that there are no reasonable available developable and deliverable sites in Twickenham Town Centre for this development. The scheme could be reconfigured to fall within the TW7 boundary, but such an arrangement would detract from the urban design merits of the proposed scheme.

7.3 Where the proposed development fails to pass the Sequential Test, and where there may be conflict with policy LP21, we ask that the LPA gives due regard to the following material considerations when undertaking a planning balance exercise:



- The proposed development would not be in conflict with the development plan as a whole.
- In accordance with the development plan, the proposed development makes best use of previously developed, accessible brownfield land.
- In accordance with the development plan, the proposed development brings a derelict site back into active use, taking advantage of its riverside location and improving links between this area and the core of the town centre in alignment with the Twickenham Area Action Plan.
- The proposed development meets objectively assessed housing need in Twickenham Main Centre.
- The proposed development provides town centre uses including retail, office and a gastropub. These uses are required to sustain the existing community and promote vitality in one of the borough's five main centres.