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By email.

Dear Lucy,

**Twickenham Riverside
Response to Additional Comments – PLA, Public Realm, Parks and Ecology Response**

This letter seeks to provide a response to additional queries via email dated 23 and 24 March 2022. This email seeks clarification on a number of matters raised from officers. These responses should be reviewed prior to the workshop session being held with officers on 27 April 2022.

Officer Comment	Applicant Response
Port of London Authority	
Twickenham Riverside LBRUT Highways Comments Response' should be updated - page 21 states that the only vehicles larger than 7.5t box vans are anticipated to require access to Wharf Lane via the Embankment are the articulated lorries generated by the existing Iceland supermarket, and the LBRuT refuse collection vehicles. This is incorrect and must also refer to the occasional large vehicles which provide deliveries to the operational boatyards located on Eel Pie Island.	This is correct and the applicant will update this response accordingly.
There is concern that the floating ecosystem may not be suitable in tidal waterways, where the fluvial and tidal flows can reach 6 knots of current. Please confirm it has been designed for such waterways and provide examples to demonstrate suitability	We confirm that the floating ecosystem is suitable for tidal waterways. Please see the Biomatrix Modular Floating Ecosystems document for further details and examples of how this has worked in other locations.
Agreement for a condition regarding the management of floating ecosystem, to be included in the Landscape and ecology management plan (LEMP), including details on who will be responsible for the ongoing maintenance/monitoring of the floating ecosystem	The applicant is happy to accept an appropriately worded condition, of which will be discussed and agreed following the grant of planning permission.
Please detail / confirm as to whether the floating ecosystems will float at low tide. If not, how will the design take this into consideration	Please see the re-submitted Biomatrix Floating Ecosystems document which explains how the ecosystem responds to low tides.
The Port of London has raised a number of other matters, which can be conditioned. However, I will need agreement from you on the following pre-	The applicant can agree to these in principle but it is requested we discuss and agree the exact wording accordingly.

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<p>commencement conditions if a positive recommendation is made:</p> <ul style="list-style-type: none"> • Transport: Details of the management of vehicle access along the Embankment • Construction Stage: Construction Management Plan - Include clause for engagement and coordination with stakeholders / operational boatyards on Eel Pie island. <ul style="list-style-type: none"> • River Works Licence: Slipway repairs - further details required (condition) and an informative to advise the proposed slipway repairs, pontoon and floating ecosystem proposals requires a river works licence with the PLA • Riparian lifesaving equipment • Piling methodology and proposed mitigation measures to prevent impacts from underwater noise - percussive piling is likely to be prevented from being undertaken between 1st March and 31st October. • Navigation Risk Assessment – (as part of the required River Works Licence) – need to consider impacts of the proposed pontoon would have on recreational/leisure use in the summer months with a further mooring survey undertaken to assist with assessing the impact on the area within the NRA. • Further details of pontoon (in consultation with PLA) 	
Ecology	
<p>Lighting: Excessive, overspill on river and impact on biodiversity – trees are not a barrier to such light pollution as these will take a minimum of 20+years to reach maturity required to act as a proper light barrier for bats and even then, only in the summer months. There must be no artificial light spill on the river and along the top of the riverside bank (in front of the trees).</p>	<p>The lighting strategy has been devised to minimise lighting to the River Thames and soft landscape areas, whilst fulfilling safety needs and other functional requirements. Please refer to lux level plan attached and contained in Appendix 5 of the submitted Ecology Impact Assessment. Moreover, the new lighting along the south-eastern boundary will include downward directional lighting to provide an improvement from the pre-development lantern style lighting scheme.</p>

	<p>No new lighting is proposed along any of the boundaries of the Site with the exception of the south-eastern boundary along the River Thames. This is required as it was not possible to retain the existing light columns in this location. It is also proposed to replace the current lighting along the pedestrian walkway on the north side of the service road with heritage lantern lighting for consistency with Wharf and Water Lanes.</p> <p>Three lights are proposed on each pole. Calculations show lux levels at approximately 1 lux over the edge of the River Thames, equivalent to a full moon on a clear night/twilight (BCT & ILP, 2018).</p>
<p>The gap in the tree line along the river is unacceptable. There must be further tree planting to provide a connected canopy layer.</p>	<p>The gap in the tree line along the river embankment is the result of the iterative design process to maximise views of the River Thames from the site, particularly the proposed event space. Notwithstanding, gaps between trees already exist within the existing layout.</p>
<p>Concerned over the lack of detail regarding the transplantation of the Black Poplar and ongoing maintenance to ensure it survives.</p>	<p>We will be relocating the Black Poplar to the southeast corner of the proposed children's playground, near the Service Road. The applicant has been in discussions with Civic Trees, who have visited the site, assessed the tree and advised that the tree can be safely moved using their tree spade with a good chance of survival.</p>
<p>The inclusion of green walls and roofs is welcomed, however, sedum roofs are not acceptable.</p>	<p>We will be omitting the 5 sq.m of sedum roof from the bin store, replacing and relocating this with 7 sq.m of biodiverse roof with plug planting on top of the garden store.</p>
<p>Noted the failure to meet the UGF score of 0.4</p>	<p>The site red line boundary includes Water Lane and Wharf Lane and the service road, all public highway. The inclusion of these roads artificially inflate the area in which a UGF score could be calculated. Once these roads are removed from the realistic calculation area, the UGF score increases to 0.37, up from 0.32. Please see drawing 6975_150_UGF.</p> <p>Notwithstanding, as the proposed development is a mixed-use proposal it is more appropriate to seek a UGF target of between 0.3 and 0.4, rather than a 0.4 target which is for residential-only developments. Moreover, a commercial development requires more hard landscaping because of an increased footfall.</p>

<p>Floating ecosystem - Twickenham species list and the plant list do not correlate (if the yellow highlighted sections in the plant list and the yellow dotted species are supposed to be the same) please can this be checked and if necessary updated?</p>	<p>The Biomatrix Plant List Guide is effectively a catalogue of all possible planting species offered to the applicant. However, the Twickenham Riverside Planting List details those plant species recommended specifically in relation the proposed development. Both aforementioned documents have been reissued for ease.</p>
Public Realm	
<p>The scheme proposes tarmac along Water and Wharf Lane for the carriage way surfacing. This is contrary to the TAAP, which seeks:</p> <ul style="list-style-type: none"> a) An extension of the shared surface treatment along Water Lane / Embankment / Wharf Lane (Principle 1) b) Pedestrian priority with shared surface treatment along Water and Wharf Lane (7.5.4) 	<p>The applicant can agree to treat Water Lane in modules of natural stone to footways and natural stone in order to create continuity with the Church Street parade and extend the shared surface treatment along Water Lane to the Embankment and river edge. Please see drawing 6975_100 prepared by LDA.</p> <p>We do not consider it appropriate to pave Wharf Lane given it is predominately a public highway for service vehicles to use rather than as a main access point to the River Thames.</p>
<p>It is noted that the junction of Water Lane with King Street is currently paved in granite setts and is already quite heavily used by vehicular traffic including heavy lorries on occasions, without problems. Therefore, it is recommended the materials for the carriageway are reconsidered. If not achievable, alternatives should be explored, such as Resin bound gravel, which will appear visually better than asphalt, and such is used on the eastern section of The Embankment and has characteristics of a shared surface.</p>	<p>Please see drawing 6975_100 prepared by LDA. This illustrates that Water Lane and the area of King Street within the applicant's red line boundary to be paved with small-sized modules of natural stone.</p>
<p>There remains inconsistency with the submission - The Landscape Supporting Technical Drawings include sections down Water Lane, and still indicates stone to footways and shared surface.</p>	<p>As we are now proposing paving to the footways and shared surfacing along Water Lane, there is no longer an inconsistency. Please see drawing 6795_100 prepared by LDA.</p>
Parks	
<p>Lighting: The applicants are advised amendments are needed in the layout, design and type of lighting proposed. Any new lighting must have the ability to support banners, decorations and hanging baskets and a colour temperature of 3000K in all areas.</p>	<p>We propose to provide a good light distribution across the site, meeting the appropriate British Standards required for the different types of space. Please refer to the External Lighting Strategy drawing. This drawing locates lighting columns evenly across the different areas whilst minimising visual clutter. Directional lighting is proposed along the embankment to mitigate light spill onto the river. Luminaires are proposed with minimal or no upwards light component. The lighting proposal will meet the 3000K requested within the public amenity</p>

	spaces. We propose that the products are decided upon through condition.
<p>Landscaping and Public Realm: If Parks are to maintain the site, they need to have significant input into the choice of landscape and public realm to ensure they can be maintained sustainably and are affordable. The public realm is a significant part of the development, and it is deemed necessary to have clarity over such matters prior to decision, in particular:</p> <ul style="list-style-type: none"> • Hard surfacing • Furniture <ul style="list-style-type: none"> ○ Seating (particularly their accessibility and maintenance needs) ○ bin types; ○ bollards (reliability, especially in flood conditions); • Irrigation • Water supply to Events area; • Plant choice (easy future maintenance needed); • Flood impacts on access / furniture / planting; • Riverside lifesaving equipment (including necessity of). 	<p>The details listed in officer comments are typically addressed post-planning planning during the Stage 4 design process. Therefore, subject to receiving planning permission, the applicant is willing to discuss and agree to appropriately worded conditions to ensure the council retains the appropriate level of control over the quality and delivery of the public realm/landscape.</p>

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

Yours sincerely,



Jodane Walters MRTPI
Senior Planner
Savills Planning