

20 December 2021



FAO Lucy Thatcher
Civic Centre
44 York Street
Twickenham
TW1 3BZ

Jodane Walters
E: jodane.walters@savills.com
M: +44 (0) 7929 770 914

33 Margaret Street W1G 0JD
T: +44 (0) 20 7499 8644
F: +44 (0) 20 7495 3773
savills.com

By email.

Dear Lucy,

**Twickenham Riverside (Ref. 21/2758/FUL)
Response to Comments Received During Public Consultation**

Following consultation with the LPA, statutory consultees and local residents, we are pleased to submit a pack of additional information to aid the determination of the Twickenham Riverside planning application.

This pack includes the following information:

Transport/Highways

- Highways response letter by WSP dated 17th December 2021
- General Arrangement Plan (cycle parking updates)
 - 6975_100 Rev B
- Lower Ground Floor Plan – Wharf Lane Building (cycle parking update)
 - TRS-HAL-01-B1-DR-A-3110 Rev P23

Architecture/Design

- Twickenham Riverside Ecosystem Design Pack by Biomatrix Water
- Café demise plan
 - TRS-HAL-00-00-DR-A-SK-223 Rev C01
- Wharf Lane Building – Typical Bay of Office Entrance
 - TRS-HAL-01-ZZ-DR-A-A-SK-224 Rev C01
- Wharf Lane Building – Typical Section Through Roof Ridge
 - TRS-HAL-01-ZZ-DR-A-SK-225 Rev C01
- Water Lane Building – Typical Section Through Plant Louvres
 - TRS-HAL-02-03-DR-A-SK-226 Rev C01
- Residential Standards Schedule
 - TRS-HAL-XX-XX-SH-A-9550
- Response to feedback from pre-application meeting on 4th June 2021 by Hopkins Architects dated 12/07/2021

Landscape

- General Arrangement Plan
- Existing Play and Amenity Space
 - 6975_100
- Proposed Play and Amenity Space
 - 6975_100

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- Landscape Supporting Technical Drawings incl:
 - 8975-100 Rev B (General Arrangement Plan)
 - WWs-J2132-DWG-001 Rev 00 (Irrigation System: Areas to be irrigated automatically)
 - 6975_102 Rev B (General Arrangement Roof)
 - 6975_103 Rev B (General Arrangement Tree Pit Plan)
 - 6975_350 Rev A (Sitewide Canopy Plan)
 - 6975_401 Rev B (Section through Wharf Lane)
 - 6975_402 Rev B (Section through Lawn/Terraces)
 - 6975_403 Rev B (Section through River Garden & Promenade)
 - 6975_404 Rev B (Section through trees in pavement and Rain Garden)
 - 6975_405 Rev B (Section through Water Lane & Service Bay)
 - 6975_406 Rev B (Section through Flood Wall/Terraces)
 - 6975_601 Rev A (Softworks details)

Arboriculture

- Technical Note by LDA Design

We would welcome a further meeting, particularly with the Council's Highways and Trees services to discuss our responses in more detail.

In addition to the above, we have below set out responses to other queries raised by the LPA in its assessment of the planning application. These comments are set out under the following heads:

Land Use

- Retail units
- Class E flexibility

Riverside

- Floating pontoon
- Ecology baskets
- Mooring
- Boat store

Landscape

- Existing artificial lawn in DJG
- Play equipment
- Storage unit
- Café demise
- Tree line
- Parking bays
- Gate to the service road
- Water Lane surfacing
- Levels
- Benches

Wharf Lane Building

- Stair core
- Refuse store
- Kitchen frontage

- Brick type
- Office entrance

Water Lane Building

- Facing bricks
- King Street elevation
- Roof details
- Building lines

Housing

- Affordable housing
- Lift management plan
- Residential space standards

- Sustainability

Land Use

Retail units

A query was raised about the usability of the proposed retail units particularly in respect of their size and provision for back of house facilities. The design of these units has been informed by agency advice from Avison Young where the absence of basements or first floor storage/ancillary areas has been considered. Avison Young have advised that the units are fine as they are a good size for the type of retail uses they will be used by. In addition, we know note that the proposed units will be larger than existing units on Church Street and that interested parties have already begun to approach the Council about potential tenancies.

Class E flexibility

The application seeks the more flexible Use Class E for the retail units on Water Lane and the office space in the Wharf Lane building. Use Class E was created by central Government to introduce greater flexibility within the planning system reflect changing retail requirements in town centres. In developing the retail strategy for this scheme, commercial agents have as advised the importance of incorporating flexibility into the letting strategy for Water Lane noting a surfeit of retail space in Twickenham Town Centre. A flexible approach to uses classes in the Water Lane units is therefore considered key to their commercial viability and ultimately to the realisation of the Twickenham Area Action Plan principle to strengthen the retail offer on Water Lane and ultimately make Twickenham a more attractive destination.

The scheme proposes 320sqm of office floorspace (Use Class E) on the ground floor of the Wharf Lane building, resulting in an uplift on the site of 75sqm. This space has been designed with office uses in mind, however Use Class E is sought in order to ensure future flexibility, particularly in the context of changing work patterns and demand for new office floorspace resulting from advances in technology and the ongoing COVID-19 pandemic.

Riverside

Floating pontoon

Officers have stated that details of piling for the proposed floating pontoon and other measures required to keep the pontoon afloat will be required. As is standard for a project of this scale, this level of detail is to be worked up in the next stage of construction design in consultation with Port of London Authority. We are happy for such details to made subject to a Grampian condition.

Ecology baskets

Further details relating to the modular floating ecology baskets from the supplier Biomatrix Water are enclosed.

Mooring

Detailed design and siting of the floating ecology baskets will ensure that mooring opportunities are safeguarded, particularly for cruisers/recreational users who cannot leave their boats on land or shallow water. The planning stage design assumes the availability of at least one mooring in the proposed condition.

A survey to establish the existing number of moorings has been instructed. However, our observations to date is that very little mooring takes place on this stretch of the river front owing to the presence of the Eel Pie bridge which impedes onward movement. We would be happy to accept a Grampian condition requiring details of provision for mooring informed by the surveys and detailed design of the ecology baskets.

Boat store

The scheme proposed the provision of boat store within the flood defence wall to the south of the Wharf Lane building. The design has been developed in consultation with Environment Agency (EA) and meets EA's requirements in the following ways:

- The flood defence wall is visible through structure and has no back allowing for inspection
- The top of flood defence wall remains visible from above for inspection
- The structure is water permeable and floodable
- The structure is easily removable/demountable to allow repair work to the flood defence wall
- In developing the proposals, meetings took place with a number of local interest groups and clubs to gauge the level of interest in such a facility.

The design of the boat store strikes an appropriate balance between meeting a set of clear functional requirements while also being sensitive to the riverside setting of this part of the site. We do not agree that the proposed design is basic or that it would benefit from further detailing that we consider would compromise its functionality.

Landscape

Existing artificial lawn in Diamond Jubilee Gardens (DJG)

An existing area of artificial grass in the DJG adjacent to the astroturf is currently used flexibly for outdoor gatherings and events. This space is 216sqm and has no connections to either power or water. The loss of this space in the proposed development is offset by the provision of 720sqm of flexible event space on the Embankment which will have power and water connections. The submitted Landscape Design and Access Statement identifies how this space can also be used for smaller-size activities. Plans showing the existing and proposed provision are enclosed.

Play equipment

A comparison of the existing and proposed provision of play equipment is set out on page 84 of the submitted Design and Access Statement and in the enclosed plans 6795_100. Existing items are to be replaced on a like for like basis in addition to new provision for children residing in the development. Drawings showing the existing and proposed play and amenity provision are enclosed which confirm the provision of a sand pit and sand tipper in the proposal. The sand pit is located in the corner of the play area in order to ensure that access is not inhibited for people using wheelchairs or pushchairs.

Storage unit

The scheme proposes a storage unit adjacent to the play area. A freestanding storage unit has been requested by the Twickenham Riverside Trust to ensure ease of access and the ability to securely store equipment. The unit is sited to ensure it can be screened by planting. Further design detail can be provided through discharge of condition.

Café demise

A demise plan illustrating the café spill out area is enclosed (TRS-HAL-00-00-DR-A-SK-223 Rev C01).

All tables and chairs will be moveable.

Tree line

Officers have suggested that a continuous line of trees along the embankment should be provided. The provision of a gap is central to the design intent for the landscaping which seeks to provide visual, as well as physical links between the upper parts of the site and the riverfront.

Parking bays

Officers have advised that an element of landscaping should be incorporated along the parking bays by Eel Pie Island, further suggesting there should be a landscaping strip to the east. The strip of planting by the service bays to Eel Pie Island bridge has been widened and a vehicle barrier added. Details are provided in the revised plan and section in the updated Landscape Supporting Technical Drawings document.

Gate to the service road

Officers have suggested that the service road gate be removed and that set back bollards are provided instead. The use of bollards was considered by our design team in consultation with the Twickenham Riverside Trust and it is considered that to ensure the safety of children using the play space that a gate is more appropriate than bollards. A pedestrian gate adjacent to the proposed café ensures that permeability from the service road into the site is maintained.

Water Lane surfacing

Officers have suggested that the small stone pavers proposed for the footway should be extended along the carriageway of Water Lane to match the paving along Church Street. We note that in contrast to Church Street, Water Lane is a direct vehicular connection between King Street and the river front and will have

heavier traffic demands placed on it than experienced by Church Street. It is therefore paramount to ensure that the treatment to the carriageway is robust and can be maintained in an efficient and expedient way.

The proposals by virtue of the setting back of the building line, provision of natural pavers, active ground floor frontages and increased greening significantly enhance the streetscape and pedestrian experience on Water Lane.

Levels

Officers sought confirmation over whether the proposed ramps satisfy relevant access guidance. As all proposed are at a 1:21 standard they are not technically ramps. Notwithstanding, the dimensions of these are identified on page 65 of the submitted Design and Access Statement.

Benches

The submitted plans show indicate where benches/seating will be provided. Further details will be worked up in the next stage of design as is typical for a project of this scale and we would be happy with the imposition of a condition requiring the submission of this information.

Wharf Lane Building

Wharf Lane stair core

Officers suggested windows be reinstated at the base of the building's staircase opening to avoid a blank frontage. However, these must be blank in order to be fire separated from the staircase of the residential uses on the upper floors. The solid wall is required at the lower levels of the building and must be sealed for fire safety.

Refuse store

Officers sought clarification of whether doors open out on Wharf Lane onto public highway. These doors serve the proposed the bin store and a larger storage area would be required if the doors were opening inwards.

Kitchen frontage

Officers have queried whether the proposed kitchen frontage on Wharf Lane can be softened. Kitchens typically require blank facades for practical reasons such as for storing equipment. Notwithstanding this, to introduce more glazing to this element of the proposed development reduces the overall energy efficiency of this scheme.

Brick type

Officers have suggested that a buff brick is too bland and noted a Richmond Blend is preferred. For clarity, the proposal for the Wharf Lane building is for London Stock which has tonal variations in it. Notwithstanding, we are happy to agree to the imposition of a condition on the brick details.

Office entrance

Officers asked for consideration of the office entrances and the sense of place and arrival for users and visitors. The entrance includes a canopy and this together with the signage strategy and overall landscape design will aid wayfinding. A drawing showing a dimensioned typical office bay is enclosed.

Water Lane Building

Facing bricks

Officers have advised that condition should be imposed on a planning permission to ensure a multi-blend of red brick is used, we are happy to agree to this.

King Street elevation

Officers have suggested that the inclusion of a window or other detail is required to provide greater vertical emphasis on the stair element of the King Street elevation. This has been reviewed at pre-application stage by the design and given the level of the staircase landings behind the façade, we still consider that it is better to not have a window in this piece of wall but to leave it as a neutral recess between the two buildings.

Roof details

As requested by officers, typical sections through the roofs on both buildings are enclosed.

- TRS-HAL-02-03-DR-A-SK-226 Rev C01 (Water Lane)
- TRS-HAL-01-ZZ-DR-A-SQ-225 Rev C01 (Wharf Lane)

Building lines

A study comparing the proposed building line with the existing condition and the previously recommended scheme by Carey Jones Chapman Tolcher is provide at page 130 of the submitted Design and Access Statement. This shows that although the new building is taller than the existing building it replaces, because it has been set back from the existing building lines it will generally have a lesser impact on daylight and sunlight to neighbouring properties and visual amenity than either the existing building or the previous proposal.

Housing

Affordable Housing

Officers sought clarification on what the affordable housing funding has been attributed. An assumption around GLA funding has been factored into the offer from the Registered Provider and qualification for the current round of funding is being targeted.

Lift management plan

Officers requested a robust lift management plan be submitted. The Applicant can agree to this and is willing to provide this through the discharge of condition.

Residential space standards

Officers requested a separate document outlining that the proposed units satisfy adopted residential space standards. Details are set out in the enclosed Residential Standards Schedule (TRS-HAL-XX-XX-SH-A-9550) by Hopkins.

Sustainability

Officers have raised a query around the submission of a BREEAM pre-assessment for non-residential uses. This details has already been submitted and is included in the submitted retail and office pre-assessments.

Officers queried whether the proposed development's 'Be Lean' target can be improved from 12% to 15%. The score of 12% is largely a function of the high levels of glazing in the retail and commercial units required to both animate the ground floor plane and optimise attractiveness to potential tenants.

I hope the enclosed information is useful and allows the LPA to progress with the assessment and positive determination of this planning application.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read "Savills" in a cursive, stylized script.

**Jodane Walters MRTPI
Planner**