



Planning Department  
Richmond and Wandsworth Council  
Civic Centre,  
44 York St,  
Twickenham  
TW1 3BZ

Our ref: Pending  
2 September 2024

**PUBLIC**

02/09/2024

Dear Sir / Madam,

**1-1C King Street, 2-4 Water Lane, The Embankment And River Wall, Water Lane,  
Wharf Lane And The Diamond Jubilee Gardens, Twickenham**

**NMA Submission to alter trigger for conditions:**

- **NS29 Affordable Housing**
- **NS30 Accessible Homes**
- **NS32 Noise Impact on Structurally**
- **NS42 Play Provision (possibly)**
- **NS122 Energy Reduction**
- **NS34 Residential Refuse and Waste**

On behalf of our client Wandsworth and Richmond Council, c/o Kier Construction, please find enclosed a Non Material Amendment application to vary the trigger for condition NS29, NS30, NS32, NS34, NS42 and NS122 of planning permission ref 21/2758/FUL (granted 21/12/2022) for 'Demolition of existing buildings and structures and redevelopment of the site comprising 45 residential units (Use Class C3), ground floor commercial/retail/cafe (Use Class E), public house (Sui Generis), boathouse locker storage, floating pontoon and floating ecosystems with associated landscaping, reprovision of Diamond Jubilee Gardens, alterations to highway layout and parking provision and other relevant works'.

This application seeks an amendment to the triggers of the consent only, as opposed to any changes to the actual requirements of the condition. This change is sought because the detail required in relation to the relevant conditions will not be confirmed until later design phases. Our client is currently focussed on submitting the information required in relation to the relevant pre commencement conditions to allow a start on site in line with programme, and removal of the conditions as listed above from the list of full pre commencement conditions will allow efforts to be focussed on the information required for these.

The changes are outlined in the table below:

Condition	Approved Wording	Suggested Wording
NS29 – Affordable Housing	Prior to the commencement of development.....	Prior to construction of the super structure / above ground works (excluding any demolition of the buildings above ground as per Plan TRS-HAL-ZZ-00-DR-A-SK-262 CO1),
NS30 – Accessible Homes	Prior to commencement of development hereby permitted, excluding any demolition of buildings above ground as per plan TRS-HAL-ZZ-00-DR-A-SK-262 CO1.....	Prior to commencement of the above ground works hereby permitted, excluding any demolition of buildings above ground as per plan TRS-HAL-ZZ-00-DR-A-SK-262 CO1
NS32 – Noise Impact on Structurally Adjoining Properties	Prior to the commencement of the development hereby permitted.....	Prior to the commencement of above ground works (excluding demolition).....
NS34 – Residential refuse and waste	Prior to commencement of development....	Prior to commencement of excavation works for the basement level or above ground works
NS42 – Play Equipment	Prior to the commencement of the development.....	Prior to above ground works....
NS122 – Energy Reduction	Prior to the commencement of development.....	Prior to the commencement of above ground works (excluding demolition).....

Below is the suggested wording for the conditions in full, with the amendments highlighted in yellow. A copy of the decision notice is attached in appendix 1 with the approved wording.

## PROPOSED WORDING FOR NS29

U0146069 NS29: Affordable housing

1. The upper floors of the Water Lane building shall not be occupied other than by 21 affordable homes with the following tenure, mix and size of unit:

- a) Affordable rent:
  - i. 1bed (2 person): 9 units
  - ii. 2bed (3 person): 1 unit
  - iii. 2bed (4 person): 6 units
  - iv. 3bed (6 person): 1 unit

- b) b. Intermediate:

- i. 1bed (2 person): 2 units
- ii. 2bed (3 person): 2 units

2. No more than 50% of the market housing within the Wharf Lane building shall be occupied, until the time when all the affordable homes in the Water Lane building are ready for occupation.

3. The London Borough of Richmond shall have nomination rights for all the affordable rented products.

4. The intermediate housing units shall meet the London Borough of Richmond's Intermediate housing statement, and will deliver two thirds of the shared ownership homes that are affordable at gross household income of £50,000, and the remaining third affordable to those on household incomes up to the GLA intermediate housing threshold of £90,000 per annum.

5. Prior to construction of the super structure / above ground works (excluding any demolition of the buildings above ground as per Plan TRS-HAL-ZZ-00-DR-A-SK-262 CO1), the following details shall be submitted to and approved in writing by the Local Planning Authority.

The development shall not be occupied other than in accordance with the approved details.

- a) details of the affordability of all the residential units, taking account of service charge and the affordability criteria
- b) marketing strategy for all intermediate homes.

REASON: To accord with the terms of the application and ensure the scheme delivers the priority housing.

### **PROPOSED WORDING FOR NS30**

U0146070 NS30 Accessible homes

Prior to commencement of the above ground works hereby permitted, excluding any demolition of buildings above ground as per plan TRS-HAL-ZZ-00-DR-A-SK-262 CO1, a scheme confirming engagement with the Councils Specific housing occupation therapist in the design and fit out of the affordable residential units hereby approved shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be implemented other than in accordance with the approved scheme.

REASON: To ensure an acceptable design and layout to all M4 homes.

### **PROPOSED WORDING FOR NS32**

U0146072 NS32 Noise Impact on Structurally Adjoining Properties

Prior to the commencement of above ground works (excluding demolition), hereby permitted, details of the proposed sound insulation scheme to be implemented between the residential accommodation and any non-residential uses shall be submitted to and approved by the Local Planning Authority. Details should include airborne and impact sound insulation. The developer shall certify to the local planning authority that the noise mitigation measures have been installed. The approved scheme is to be completed prior to occupation of the development and shall be permanently maintained thereafter.

REASON: To ensure a suitable standard of accommodation.

### **PROPOSED WORDING FOR NS34**

#### U0146074 NS34 Residential - Refuse and Waste

1. Prior to **commencement of excavation works for the basement level** or above ground works, the following details shall be submitted to and approved in writing by the Local Planning Authority

- a. details of the push routes between the bin stores and the vehicle waiting area. The details shall demonstrate the service is smooth, hard standing, drop kerbs, and free of any steps or steep slopes.
- b. Details of potential locations for temporary storage of bulky waste items for collection shall be identified.
- c. A feasibility scheme into whether additional space in each of the two residential bin stores for a 240L wheelie bin could be provided for food recycling.
- d. Confirmation of the access detail to the bin stores The development shall not be implemented other than in accordance with the approved scheme.

2. Refuse and waste collections shall only access the Embankment between the hours of 7am-10am.

REASON: To ensure appropriate provision and access, and encourage recycling.

#### **PROPOSED WORDING FOR NS42**

##### U0146082 NS42 Play provision

**Prior to above ground works,** full details (siting, equipment, design, materials, surface treatment, accessibility and sensory provision) of the play provision shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented in full and ready for use prior to the first occupation of the development and use of the open space. The approved scheme shall remain in situ thereafter.

REASON: To ensure a suitable play space environment with sufficient facilities for the occupants and visitors to the site.

#### **PROPOSED WORDING FOR NS122**

##### U0146152 NS122 Energy Reduction

1. The energy reduction for both residential and non-residential uses shall be achieved in line with the strategies outlined in the Energy Statement (Skelly & Couch, August 2021)

2. The residential uses hereby approved shall achieve not less than 64% reduction in Carbon dioxide emissions beyond Building Regulations requirements (2013).

3. The non-residential uses hereby approved shall achieve not less than 45% reduction in Carbon Dioxide emissions beyond Building Regulations requirements (2013).

4. **Prior to the commencement of above ground works (excluding demolition)** a scheme shall be submitted to and approved in writing by the Local Planning Authority to detail measures that will be implemented to ensure there is a robust plan for monitoring both residential and non-residential uses and annual reporting (for at least 5 years), in accordance with the London Plan Be Seen layer of the energy hierarchy. The development shall not be implemented other than in accordance with the approved scheme.

REASON: In the interests of energy conservation in accordance with the Development Plan.



We trust the above is clear. The changes do not result in any reduction in the level of information to be provided to the LPA, but merely move those requirements to a more appropriate juncture in the build process. We believe the changes are clearly non material alterations to the approved scheme.

Yours sincerely

**Matthew Black**  
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Planning  
WSP

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