



The Planning
Inspectorate

Report to the London Borough of Richmond upon Thames

by Wendy Burden

an Inspector appointed by the Secretary of State for Communities and Local
Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO THE TWICKENHAM AREA ACTION PLAN

Document submitted for examination on 5 October 2012

Examination hearings held between 12 and 19 February 2013

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Abbreviations Used in this Report

AAP	Area Action Plan
CS	Core Strategy
DMDPD	Development Management Development Plan Document
LBRuT	London Borough of Richmond upon Thames
LDS	Local Development Scheme
LEDS	London Economic Development Strategy
LP	The London Plan (2011)
LPA	Local Planning Authority
MM	Main Modification
NPPF	National Planning Policy Framework
PUA	Principal Urban Area
TfL	Transport for London
TP	Mayor's Transport Plan
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SES	Strategic Employment Site
SRA	Strategic Regeneration Area

Non-Technical Summary

This report concludes that the Twickenham Area Action Plan provides an appropriate basis for the planning of the Area over the next 15 years providing that a number of modifications are made to the Plan. The Council has specifically requested that I recommend any modifications necessary to enable them to adopt the Plan. Many of the modifications to address this were proposed by the LPA, and I have recommended their inclusion after full consideration of the representations from other parties on these issues.

The modifications can be summarised as follows:

Changes to the proposals for Station Yard (Site TW2) and supporting text to ensure that any redevelopment only includes public parking if there is a proven requirement within Twickenham following any loss of parking spaces as a result of regeneration within the Town Centre.

Revisions to the proposals for Twickenham Riverside (Site TW7) and to Map 7.12 in respect of: the use of the Embankment for servicing and local access with the provision of a service road to the rear of properties in King Street; the redevelopment/reuse of the former public toilets; the redevelopment/reuse of buildings associated with the former public baths; and the redevelopment of the car parking area in Water Lane;.

Other changes necessary to ensure that the plan is consistent with the modifications set out above.

Introduction

1. This report contains my assessment of the Twickenham Area Action Plan (TAAP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted draft plan (October 2012) which is the same as the document published for consultation in July 2012.
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (MM). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound and thus incapable of being adopted. These main modifications are set out in the Appendix.
4. A list of changes to the TAAP proposed by LBRuT as a result of final consultation was issued on the 17 October 2012, and a further list of changes relating to Site TW2 was issued in November. All of these changes have been the subject of public consultation. Other changes to the TAAP were discussed during the Hearings on the Plan, and these have been the subject of public consultation. I have taken the consultation responses into account in writing this report. However, for the avoidance of doubt, this report deals only with those changes which I consider to be major modifications which are necessary to secure the soundness of the TAAP.

Assessment of Duty to Co-operate

5. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation. The duty came into effect on 15 November 2011 on the Localism Act coming into force.
6. The TAAP covers the town centre of Twickenham, and its boundaries are set within the London Borough of Richmond upon Thames (LBRuT) at some distance from adjoining Boroughs. There are no proposals of such significance within the TAAP which might impact upon adjoining Boroughs, which is reflected in the lack of any response from those Boroughs or from the Surrey County Council to the consultation which has taken place at each stage of TAAP preparation.
7. In addition to neighbouring Boroughs, the Council consulted with the Greater London Authority and other statutory consultees. There are also a number of regional and sub-regional groupings where the TAAP has been discussed. The Local Nature Partnership for London is the All London Green Grid Partnership, which is now one of the bodies prescribed for the purposes of S33(A) of the Planning and Compensation Act. The submission of the TAAP predates the implementation of this amendment to the legislation such that no specific consultation has been carried out with the ALGG in relation to the AAP. However, the Council has been working closely with the ALGG on

nature conservation matters¹ such that the ALGG would have been aware of and engaged in any such matters of relevance to the TAAP.

8. The Council has set out the consultation undertaken at each stage of the Plan preparation process in the Statement of Consultation², and has submitted to the examination a statement to set out the steps which it has taken to comply with the duty to cooperate³. Representors have not raised any issue as to the quality or level of the engagement which has been carried out and I am satisfied that the duty to cooperate has been discharged.

Assessment of Soundness

Preamble

9. The TAAP will form part of the development plan for the LBRuT. It must be in general conformity with national planning policy as set out in the National Planning Policy Framework (NPPF); regional policy which includes the London Plan (LP), the London Economic Development Strategy (LEDS) and the Mayor's Transport Plan (TP); and the LBRuT's Core Strategy (CS) and Development Management DPD (DMDPD).

Main Issues

10. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings, I have identified the issues upon which the soundness of the Plan depends under four main headings⁴, and the LBRuT has responded to these issues in its position statements.

Issue 1 - Vision, Objectives, Spatial Strategy and Opportunity Areas

1.1 – Does the plan have a sound spatial strategy/vision and objectives, having regard to the local context and needs?

11. The TAAP provides a framework for development and change within Twickenham town Centre over the next 15 years. It is intended to provide the context for achieving the revitalisation of the town centre. The Plan area includes that part of the Thames Embankment which faces Eel Pie Island, and extends to the north of the railway line to include the former Post Office Sorting Office, to the civic centre precinct to the east, and westwards to include the commercial uses along Heath Road. The town centre is the largest of the four district centres of the Borough, and was identified in Core Strategy Policy CP9 as a focus for revitalisation to meet the needs of local residents, local workers and students, and visitors to the local attractions including the Riverside, the Twickenham Stadium, Strawberry Hill, and local museums and historic buildings.
12. The Eel Pie Island Association and others considered that the boundary of the Town Centre should include Eel Pie Island. However, there are no proposals for development or redevelopment on the Island which it would be appropriate to include in the TAAP, whereas there are a number of policies in the DMDPD which seek to protect the traditional mix of uses which characterise the Island. Whilst I understand the interest of the Association in seeking to include the Island in the Plan area, its omission does not affect the soundness of the Plan in terms of any of the tests set out in para 182 of the

¹ CR/02A

² SD/09

³ ED/02

⁴ ED/03

NPPF. In these circumstances it would be inappropriate for me to recommend such a change to the boundary of the Plan area.

13. However, proposals for developing the Embankment (Site TW7) would be likely to have consequential effects on the residents and businesses of Eel Pie Island; and I identify a need in the AAP for it to attach importance to the Twickenham Embankment as a working water front which supports Eel Pie Island and its uses. I consider that modifications to the Plan in this respect are required to ensure that the plan is positively prepared and effective. I deal with the matter in detail in relation to TW7, but the spatial strategy requires clarity in relation to the working waterfront from which Eel Pie Island is serviced and accessed. I therefore recommend **MM3** to ensure that the Plan takes a positive approach to the continuation of the waterfront uses which give character to the embankment fronting Eel Pie Island. Furthermore, work has already been carried out to create the Jubilee Gardens on the site of the former swimming pool. Having regard to the difference in levels between the Gardens and the embankment, I question the likelihood that the two areas would be amalgamated into one area of open space. I deal with this matter in more detail later in my report, but in order to ensure that the Spatial Strategy as expressed in para 3.4.2 is consistent with my recommendations for site TW7, **MM2** is required to ensure that the strategy for the Riverside is one which is likely to be delivered and therefore meets the test of being effective. I note the Council's views on **MM2** and return to my reasons for this recommendation under sub issues 2.3, 3.1 and 3.2.
 14. The Vision for the TAAP takes forward the provisions of CS Policy CP9, and the five key themes on which the Vision is based together with the Overall Objectives reflect the local context and needs of the area which the TAAP covers. The Vision provides the basis for the spatial strategy which is expressed through the specific proposals in the TAAP, and accords with National Policy which supports the maintenance and development of healthy town centres for retail, commercial and leisure uses.
 15. The Vision and Spatial Strategy for the AAP identify the five opportunity areas in which proposals for redevelopment and or enhancement are focussed in order to deliver the Vision and objectives of the Plan. Within these areas the Plan puts forward schemes for specific locations thus providing a positive spatial basis for the AAP. With the modifications which I propose in relation to the Embankment, I am satisfied that the spatial strategy/vision and objectives have regard to the local context and needs, and are sound.
- 1.2 – Are the policies and proposals consistent with national guidance, the London Plan (LP) and the LB Richmond upon Thames Core Strategy (CS), and/or supported by clear and robust evidence?*
16. I am recommending as **MM1** the addition of a new policy after the Context and Issues section of the Plan, to incorporate into the AAP the presumption in favour of sustainable development as set out in the National Planning Policy Framework. The introduction of the policy would ensure that the AAP accords with one of the tests of soundness, which is that the Plan is consistent with National Policy. It would also articulate the principle of achieving sustainable development set out in CS Policy CP9.
 17. In general terms, the policies and proposals of the TAAP carry forward the strategy for Twickenham which is set out in the policies of the CS, in particular Policy C9. The retail policies seek to upgrade, spatially consolidate and diversify retail opportunities in the Plan area and are consistent with the designation of Twickenham as a major centre in table A2.1 of the LP. The LP recognises that there could be moderate opportunities for growth in employment uses, and the AAP policies seek to protect existing employment provision and attract new opportunities in accordance with CS Policy CP9.C and table A2.1 of the LP. In terms of community uses and promotion of the riverside and town

centre to visitors, the AAP policies accord with the Blue Ribbon and tourism policies of the LP. This includes maximising opportunities for development in the short term, where the northern part of the town centre is well placed to benefit from station improvements and the 2015 Rugby World Cup.

18. Subject to the insertion of the new policy to set a presumption in favour of sustainable development, and subject to further detailed modifications in relation to specific proposals within the Plan, I find the policies and proposals of the TAAP to be generally sound.

1.3 – Are the Opportunity Areas suitably identified and are the strategic roles of the Town Centre and of the Twickenham Riverside properly defined?

19. The five opportunity areas are identified in the Vision at para 3.3 of the AAP. These separate the AAP area into the zones in which measures are to be focussed in order to strengthen the attraction of the town centre for retailing, entertainment and cultural activities. Each zone has its own particular characteristics, and the Strategy identifies the aims which the AAP seeks to meet for each area.
20. Taking each in turn, the Northern Approach is an important entrance point to the town by road users and includes Twickenham station so is the first area of the town seen by visitors travelling by rail. There are plans to upgrade the station which are currently being pursued, and three sites for redevelopment. The former Post Office Sorting Office site (TW1) is currently the subject of proposals by a developer; Regal House is being refurbished (TW3) and there are proposals for the redevelopment of the former Station Yard site (TW2) subject to its release by TfL and Network Rail. I deal with the proposals for site TW2 later in my report, and set out reasons why the proposals should be modified. Nevertheless, in view of the potential for positive improvements to this part of the town, the identification of the Northern Approach as an opportunity area is justified and likely to be effective.
21. For the Retail Core, the Council is pursuing a scheme to manage traffic and improve public areas. Through enhancement of the environment of the retail core LBRuT can increase the attraction of the area to shoppers and retailers, leading to a positive cycle of improved range and quality of retailing. Having regard to the relatively high number of charity shops, restaurants and takeaways in the retail core, and the low proportion of multiple comparison goods retailers in the centre⁵, the identification of this area within the Strategy for the enhancement of the environment is justified.
22. The Civic and Cultural Quarter includes York House and Garfield Road. York House and its grounds are in Council ownership so the aim to make more use of York House lies within the control of LBRuT. At my visits to York House I witnessed the renovation works which are currently underway to ensure the property can meet this aim. In these circumstances the area is appropriately identified as an Opportunity Area in the AAP.
23. Twickenham Riverside is a unique location having regard to the proximity of Eel Pie Island with its working boatyards and mix of residences. I heard that the debate over the future use of the Embankment together with the former swimming pool site and associated buildings had been on going for a considerable period of time. The Council has outlined in the AAP an aspirational scheme for the amalgamation of the Jubilee Gardens with the Embankment into one public park, with the associated reduction of parking and traffic access from the Embankment west of Water Lane. Whilst I have reason to consider that the Council's detailed proposals for the area cannot be justified and are unlikely to be effective (see later in this report), there is clearly scope for redevelopment or reuse of the former swimming baths buildings, the public toilets and

⁵ SD22 Twickenham Town Centre Health Check 2011

the car park fronting Water Lane. As a consequence the identification of the Twickenham Riverside in the AAP as an Opportunity Area is justified, and as stated above, I recommend a modification **MM2** to the wording of para 3.4.2 bullet point 4 to reflect the modifications recommended for the detailed proposals in the area.

24. Heath Road has an important role as a secondary shopping and service area for local residents. The aim of the AAP is to continue the enhancement of the environment and reinforce its role for retail and business uses. As an area which has potential for improvements, and where actions to be taken by the Council can be effective, its identification as an opportunity area is justified.
25. Whilst I find there are some modifications required to the detailed proposals within the opportunity areas each area has its own proposals for future development and change, and is suitably identified to support the aims and fulfil the strategy of the AAP. The aims for each area generally support the strategic role for the Town Centre set out in the LP and the CS, and this role is reflected in the Vision, Objectives and Strategy for the town centre. The opportunity area of Twickenham Riverside is appropriately defined, but for reasons which I set out more fully in relation to site TW7, I consider that the role of the Riverside and its physical constraints are not fully recognised in the aims for the area set out in para 3.4.2 or in the site specific proposals identified under TW7.

Issue 2 – Transportation, Environmental Improvements, and Land Use

2.1 – Are the transport policies and proposals consistent with national guidance, the LP and the CS, and are they clear and deliverable in the plan period?

26. The NPPF requires policies to support the viability and vitality of town centres, whilst providing for a transport system that is balanced in favour of sustainable transport; and the LP, the LEDS, and the TP include policies which accord with this national policy approach. Policies in the CS and the DMDPD also accord with the overall principles of supporting Twickenham town centre whilst giving priority to sustainable forms of transport.
27. In the AAP, the transport strategy aims to support the regeneration of Twickenham, making the town centre a more attractive place to visit and do business. It seeks to enhance the town centre and improve the environment by reducing the dominance of through traffic and creating an improved and accessible pedestrian environment in the retail core and improved links to it. Redevelopment sites identified within the AAP are well located for public transport and access to local services, and as a result the need to travel will be minimised. Better parking signage should ensure that present car parks are more efficiently used.
28. The town experiences a high level of through traffic and any scheme which sought to divert traffic from the centre would be likely to cause congestion elsewhere and be unacceptable in strategic terms. Therefore the measures which can be pursued by LBRuT are generally restricted to street scene improvements, and traffic management with improvements to pedestrian and cycling links wherever the opportunity arises. Details of the traffic scheme to be progressed for the town centre have been published for consultation in the Highways and Street Scene Scheme⁶. Some comments have been received in response to the AAP which relate to the details of this document, but the purpose of my report is to deal with the soundness of the AAP alone, so I make no comment on the detailed scheme.

⁶ SD/12

29. In general terms the transport policies and proposals in the TAAP are consistent with and seek to implement national guidance, the regional planning policy context and the CS. However, the AAP is a detailed plan which seeks to put into effect the strategic and local policies for LBRuT. In this respect I raise concern about the soundness of the principle of providing a new public car park at Station Yard. Changes have been proposed by the Council to the proposals for Site TW2⁷ such that the whole site is no longer proposed for a car park. However, the Council continues to propose public parking on a part of the site.
30. Whilst the NPPF encourages local authorities to seek to improve the quality of parking in town centres, it does not seek to increase the level of parking provision. At the local level, the CS Policy CP5F states that the Council will limit any further expansion of parking in town and local centres. I note that LBRuT refers to the recently published Portas Review⁸ to support its position that the site should be allocated for public car parking to support the town centre. However that Review is not policy, and in any event it calls for a more flexible, well communicated parking offer with high quality and secure parking provision, rather than an increase in parking provision.
31. That part of the TW2 site which is in the ownership of Network Rail is currently used for parking, with about 30 spaces provided and open to the public. The charging regime currently makes it suitable for commuter parking. The Council would seek to increase the number of parking spaces and change the charges to encourage short term parking in support of the town centre. However, the Atkins parking beat surveys⁹ carried out in 2012 indicated that whilst parking supply is well used, there are available free spaces in central Twickenham throughout the day both on weekdays and at weekends. With better signage to direct shoppers to available spaces, there is no evidence that the existing provision would be insufficient to support the town centre without the provision of an additional car park adjacent to the station, which would not in any event be conveniently located for use as a town centre car park.
32. There is concern that the traffic management measures and street scene improvements would result in the loss of on street parking spaces which would limit efforts to attract more shoppers and businesses to Twickenham. In my view the use of Station Yard as a public car park could only accord with strategic and local policy if there was evidence to demonstrate that it was necessary to replace existing car parking spaces. I therefore recommend **MM4** to change the first bullet point under para 4.5.2 such that a redevelopment of TW2 only includes public car parking if it is to replace car parking lost as a result of town centre improvements. I note that Network Rail has indicated that it would only agree to redevelopment for car parking if that were to be connected to the use of the Station. However, that must be a matter for negotiation in the future.
33. The proposals in the AAP for Twickenham Embankment seek to reduce on street parking, including that used by Eel Pie Island residents. There is no vehicular access to Eel Pie Island so residents and visitors are dependent on the embankment for parking. I deal with the provision of replacement parking along the north side of the Jubilee Gardens later in my report in relation to Site TW7, and find that it is unlikely to be appropriate.
34. Eel Pie Island with its businesses and dwellings is an integral part of the character of the working waterfront in Twickenham. The loss of parking for residents along part of the Embankment facing the Island, with the consequent increase in pressure on any parking remaining to the east of Water Lane, could undermine the existing character and

⁷ SD/35

⁸ OD/18

⁹ OD/03 para 4.7

viability of the Island as a place to live and work. This would not accord with DMDPD Policy DM OS 12 which seeks to protect and enhance existing river dependent and river related uses. I have taken into account the comments made by the Council and the River Thames Society in relation to the published draft modification DMM4 in relation to para 4.5.2 bullet 5, and recommend a modification which reflects the concerns of both parties (**MM4**). Nevertheless, I remain of the view that it is essential the Council attaches a high level of importance to meeting the parking needs of the Island residents and businesses in order to maintain the vitality and viability of the working waterfront.

2.2 – Are the proposals for environmental improvements soundly based and consistent with national guidance, the LP and the CS, including regarding heritage assets and the River Thames and Crane corridors, and are they reasonable and realistic bearing in mind associated costs?

35. The approach taken by the LBRuT in the TAAP accords with policy in the NPPF to identify strategic sites for investment and environmental enhancement, including the historic buildings and their settings, the rivers Crane and Thames and their environs, and the existing and proposed new open spaces. It also plans positively for community and local facilities, for example seeking to make more use of York House, and including community uses within the scheme for the site TW1. The AAP also promotes good design and the conservation and enhancement of the natural environment and heritage assets. All these proposals are consistent with the LP, the CS and the DMDPD.

36. There are some proposals for changes from consultees such as those put forward by the Environment Agency, but I accept the reasons given by the Council that these changes would not be appropriate. For example it would be unrealistic to commit to full river bank naturalisation along the River Crane in view of the existing development and uses which abut the river in Twickenham. Nevertheless, a number of the area specific proposals such as the upgrade to York House and redevelopment of TW1 are already being progressed which indicates that the plan is both reasonable and realistic. I am satisfied that the TAAP is sound in respect of environmental improvements.

2.3 – Is the policy approach to economic development appropriate and capable of delivery? In particular will the Policies for Retail Development (TWP1) and Employment (TWP2) enable the achievement of the Vision and Objectives of the AAP?

37. The TAAP does not seek the physical expansion of commercial uses within the town, but is based on extending the range of activities in the town centre to attract more people including tourists through increasing leisure and cultural activities. This approach fulfils the requirement of the NPPF for positive planning which supports sustainable economic growth. It also accords with the status of Twickenham in the LP as a district centre, classified as having "medium growth" which is described as having "moderate levels of demand for retail, leisure or office floorspace and with physical and public transport capacity to accommodate it".

38. There is no evidence to support any increase in retail capacity within the town, so the Plan seeks to enhance the retail offer by supporting its specialist shopping, or through the expansion or upgrading of existing units. In view of the variable quality of the shopping provision in the centre, in order to concentrate any investment in the main centre, the policy appropriately resists retail development outside the designated frontages. There is also positive support for the establishment of permanent and temporary markets, and there are suitable locations in the grounds of York House, and on the road between York House and the Civic Centre. There is also a proposal for a craft market in Jubilee Gardens, and the Council identify the Telephone Exchange as a potential location for an indoor market should it become available.

39. In seeking to build on the specialist shopping which is successful in Church Street, the Plan identifies the car park in Water Lane as a site which should provide an "active frontage". The Council clearly has in mind the development of the frontage with new retail units or another use which would provide an active frontage, and would like to maintain this as an option. However, there are physical constraints arising from the relative levels of the car park site and the road as it slopes down to the river, which would cause significant physical and financial difficulties in creating a shopping frontage at street level. In the absence of any strong demand for retail floorspace in the Town, and having regard to the position of the site at the back of the main retail frontage, a requirement to provide shopping on this frontage could be an obstacle to the redevelopment of the site and the provision of the environmental improvements sought in the Riverside area. In these circumstances I agree with the change put forward by the Council as S4 which becomes my **MM5**, and which would allow for flexibility in the redevelopment of the site in the event that circumstances change.
40. Values for residential uses in Twickenham have consistently exceeded those for employment uses, which puts pressure on the supply of office floorspace and other employment land in the town. Policy TWP2 seeks to retain the existing supply of office floor space and to protect and encourage new office and industrial premises to safeguard businesses and employment. The Policy does allow for the change of use to residential of unsuitable or underused office space which introduces some flexibility. Although the Government has changed permitted development rights to allow office to residential conversions for a 3 year period from 30 May 2013, subject to an application to the local planning authority for determination as to whether the prior approval is required, the Policy remains relevant for the long term.
41. Policy TWP3 sets out actions to be taken to secure delivery of the economic development within the town. These include the public realm, transport and environmental improvements for which funding streams have been identified, and the potential establishment of a Business Improvement District. With the intense demand for residential development, this can also be used to enable other forms of development. Having regard to the development which is either taking place or being progressed for the Railway Station, the Post Office Sorting Office site, and the refurbishment of Regal House and Premier House, I am satisfied that subject to the modification which I recommend, policies for economic development within the TAAP are sound.

2.4 – Is the policy approach to residential development appropriate and deliverable?

42. A high priority is accorded to the delivery of housing in national and regional policy. The CS Policy CP8 recognises that Twickenham provides major opportunities to provide new housing, and Policy CP1 seeks to make the best use of land. Housing delivery within the LBRuT is on track to meet the strategic target set out in the LP, and a five year housing supply has been identified in the CS and subsequent Annual Monitoring Reports (AMR). The 2011/12 AMR includes those sites identified as suited to residential development in the TAAP, and with the provision for the use of under-utilised office space above shops for residential purposes in Policy TWP2 I am satisfied that the policy approach meets the tests of soundness.

2.5 - Are the proposals for new community facilities, open space and recreation etc suitable to meet local needs?

43. Although Twickenham town centre and surrounds already cater for a range of leisure, community and cultural uses; education, health facilities and open areas; the TAAP seeks to increase investment and provide improved community uses and enhancement of the public realm. This approach accords with the NPPF which encourages local

strategies to improve health, social and cultural well-being for all, and deliver community and cultural facilities and services to meet local needs.

44. No additional policies are proposed within the TAAP to cover these uses, but there are a number of policies within the CS and DMDPD which seek to protect, enhance and promote community facilities and areas for sport and recreation. These will continue to apply within the area covered by the TAAP and I agree with the Council that further policies in the TAAP are not necessary. However, as appropriate with an AAP, there are specific proposals for leisure and community uses as part of mixed use schemes on the Former Sorting Office site (TW1); York House and its environs (TW4) and the Twickenham Riverside area (TW7). I am recommending modifications to the proposals for TW7 which should ensure that redevelopment can be delivered to make the Plan effective. However, subject to these modifications which affect other parts of the Plan, the approach taken in the TAAP accords with national, regional and local policy and meets the tests of soundness.

3 – Area Specific Proposals

3.1 – Are the site specific proposals for the five key opportunity areas appropriate and justified in terms of their function, and environmental and economic impacts?

3.2 – Are the proposals consistent with national policy and the LP as well as the CS?

45. Taking each of the opportunity areas in turn, the Northern Approach includes three specific proposal sites. TW1 is the former Post Office Sorting Office for which a scheme of redevelopment is being progressed by St James Group Ltd. The scheme generally accords with the principles for comprehensive redevelopment as set out in the TAAP. In this edge of centre location adjacent the River Crane and the station, a mix of uses to include residential and community uses would make a positive contribution to the regeneration of the northern entrance to the town. The redevelopment will enable the southern bank of the River Crane to be opened up for use as a pedestrian/cycle path, and will refurbish the underpass to the station. The Environment Agency (EA) initially requested all buildings to be set back by 8m from the riverbank. However, it has been clarified that the EA is seeking access to the riverbank rather than a specific set back distance. Since it will be for the Council to secure an adequate set back, the form of words in the last sentence of para 7.2.5.10 bullet point 4 is inappropriate and I recommend its deletion (**MM7**). As part of the same modification, I recommend that an addition be made to bullet point 9 of 7.2.5.8 such that an adequate set back is required as part of the building form to provide access for the EA to the riverbank.
46. In relation to proposal site TW2, I have found that the proposal to redevelop part of the site as a public car park for the use of visitors to the town centre would not accord with the strategic and local policies unless it was providing for the replacement of car parking lost elsewhere in the town centre¹⁰. TfL supports redevelopment for residential use with parking to serve the new units, and Network Rail seeks the removal of the designation for public car parking since it considers that any parking provision, if required, should be in connection with the station and railway. The site is not immediately adjacent to the main shopping area of the town; there are physical constraints which would limit the scale of car parking which could be achieved; and egress from the site on to the London Road is left turn only, taking vehicles northwards away from the town centre. As a result I agree that the site is neither well located nor accessed to serve as a shoppers' car park.
47. Nevertheless the Council wish to retain the option to use part of the site for public car parking, but are not yet in a position to demonstrate that the site would be required to

¹⁰ Paras 29-32 above

replace lost parking. Such a use could well be prevented by the physical constraints on the site, or the ownership by Network Rail, but by leaving the option open for further investigation there is some flexibility retained within the AAP to meet changing circumstances. I therefore recommend **MM8** which would leave it open for the site to include some public parking if it was feasible and necessary in the future.

48. The refurbishment of Regal House (site TW3) has been started. An improvement to the appearance of this dominant building will make a positive contribution to the street scene on London Road and the proposals for the site in the AAP accord fully with national, regional and local policies.
49. Within the Civic and Cultural Quarter, proposals for site TW4 are progressing as York House is refurbished and new community uses are investigated. The house and its grounds is an important asset to the town both as an historic building which can be used for community purposes and as an attractive area of open space adjacent to the river. The proposals for site TW4 are appropriate and carry forward national, regional and local policies.
50. Site TW5 is the Telephone Exchange which is believed to be in use. Although British Telecom has been consulted, no response has been received, and the Council assumes that the landowner is content with the proposal in the AAP. This is a substantial building with two road frontages which the Council propose for a variety of alternative town centre related and residential uses. Clearly whilst it remains in use as a Telephone Exchange, there is unlikely to be potential for a redevelopment or refurbishment scheme. However, it is appropriate to include the site within the AAP to ensure that potential future uses are clear in the event of it becoming available.
51. The Retail Core is centred on King Street, York Street, London Road and Church Street. It consists of the primary shopping area where the TAAP seeks the enhancement of retail frontage, improvements to the shopping environment and an extended range and quality of retail offer. The area includes the site of the Twickenham Police Station which the Metropolitan Police have indicated is likely to be closed in the longer term. The police station fronts London Road and is a Building of Townscape Merit, so the TAAP seeks the long term retention of the frontage, with the potential for the redevelopment of the less architecturally important areas to the rear. Proposals in the TAAP are for a mix of town centre uses to include creation of an active frontage to London Road, including new retail floor space. In view of the architecture and fenestration of the front elevation of the building, there could be problems in creating shop fronts, but other town centre uses could ensure that the front elevation is retained. The Plan retains sufficient flexibility for suitable uses to evolve in time should the building become available.
52. Twickenham Riverside and Embankment includes Site TW7. This site is currently a mix of uses, with a retail frontage to King Street served by a rear service road from Wharf Lane, and the recently created Jubilee Gardens to the south. Fronting Water Lane the car park provides a redevelopment opportunity, and on the corner of Water Lane and the Embankment the former public toilets are in need of redevelopment or reuse to improve the environment on the approach to the river. Adjacent to the former public toilets are the dilapidated buildings associated with the original use of Jubilee Gardens as a public swimming baths.
53. The AAP seeks a general improvement to the environment of this area, with the redevelopment or refurbishment of the existing publicly owned buildings, the redevelopment of the Water Lane car park and the reduction of traffic and removal of most on street parking on that part of the Embankment within TW7. However, there are a number of physical constraints to the aspirations of the Council, which when combined with the importance of maintaining the character of the Embankment as part

of the working waterfront, are likely to undermine the achievement of the Council's objectives for this site.

54. Taking first the proposals for the Embankment, the intention of the AAP is to reduce through traffic, remove most of the on street parking and create a pedestrian priority area. There is then a proposal to create a new landscaped public space to be extended onto the Embankment. However, whilst it would be within the council's powers to remove most of the on street parking from the Embankment, at present the car parking in this location contributes to the function of the working waterfront. Parking alongside the river is available to the general public, and is used by residents and visitors to the houses and boatyards of Eel Pie Island. It is also used for servicing of boats tied to the landing steps along the river frontage. The Council proposes to replace the lost parking by the creation of new parking on the north side of Jubilee Gardens adjacent the service road. However, the Gardens are separated from the service road by metal fencing, and there are mature Hornbeams within the Gardens alongside this boundary which when combined with the differences in ground levels would constrain the formation of such car parking.
55. During my visits to Twickenham I spent time in Jubilee Gardens. The public open space was well used, in particular by families of young children who can play safely within the fenced confines of the Gardens. The introduction of parking along the northern boundary would erode the level of open space available to the public. Furthermore, the Council suggested that the parking could be arranged in herringbone formation between the Hornbeam trees. However, the ground levels between the trees are higher than on the service road such that excavation would be required close to the tree trunks to form accessible spaces. I agree with the River Thames Society and Twickenham Riverside Terrace Group that replacement car parking in this location would not only result in loss of valued open space, but would also be likely to cause significant harm to the health of the trees.
56. Without suitable replacement parking in close proximity to the river frontage, I agree with the Eel Pie Island Association that residents and businesses on the Island would be at a disadvantage if the existing parking were to be removed. The Island has no vehicular access and relies on the use of the Embankment for servicing and parking. Eel Pie Island is part of the history and character of this part of Twickenham, as is recognised in para 7.5.2.3 bullet point 4 of the AAP. CS Policy CP11 seeks to protect and enhance the natural and built environment and the unique historic landscape of the River Thames corridor, and to protect and encourage river related industries. Residents from other parts of Twickenham have indicated their support for the removal of the car parking in order to improve the environment and the safety of visitors, but that part of the Embankment within TW7 is closely related to the activities on Eel Pie Island, and any change to its functions must take into account the potential impact on the activities on the Island in accordance with the CS policy.
57. There is potential for improvements to be made to the environment of the Embankment, but these should not be at the expense of its functional relationship with the working waterfront and the Island. The proposal to extend the service road to connect Wharf Lane with Water Lane would remove traffic servicing the properties fronting King Street from the Embankment. With this reduction in through traffic, the creation of a shared surface on the Embankment would be effective. There is scope for rearranging the parking, for example as herringbone parking between the trees along the water front, which would considerably improve the appearance of the area without a significant reduction in the level of parking provided. Such environmental improvements would increase the attraction of the Embankment to pedestrians and visitors without seriously undermining its existing function. The Council seeks to both manage and reduce parking on the river front. However, the wording of the modifications which I put forward are intended to secure a review of the car parking so

that a reduction in parking spaces would only occur if it is clear that the function of the working water front would not be undermined. With the modifications to the Plan which I recommend (see below), the conflict with the CS would be reduced, and this part of the proposals for TW7 would be sound.

58. There is also reference in the AAP to the creation of a new landscaped open space to be extended onto the Embankment. This has been interpreted by many as an aspiration to amalgamate Jubilee Gardens with the open areas of the Embankment. However, Jubilee Gardens is now an established and enclosed area of public open space. The ground level of the Gardens is above the Embankment, with the Gardens above a retaining wall. Jubilee Gardens is an established open space which is enjoyed by the public. Its amalgamation with the Embankment is not welcomed by local interest groups, and in view of the difference in ground levels, it is unlikely that the two areas would be conjoined. I therefore find that the proposals for the Embankment do not meet the tests of soundness in terms of justification and effectiveness, and also require further clarification. I recommend a number of modifications which would enable an achievable scheme to be implemented. These are included within **MM11, MM12, MM13, MM14, MM15, MM16, and MM18.**
59. On the north east side of the Jubilee Gardens, a tall fence separates the landscaped open space from the remaining area of the site and buildings which were connected with the swimming pool. The site is in public ownership and is in need of either re-use or refurbishment. At present the AAP refers to the site in general terms, and it is not entirely clear what action is to be taken to bring any proposal forward. Para 7.5.2.3 bullet 3 refers to the "derelict" former pool site, but part of the former pool site has now become Jubilee Gardens. In view of the relationship of the derelict area with the landscaped open space, the opening up of the derelict area, possibly as an extension to Jubilee Gardens, and the refurbishment or redevelopment of the buildings for mixed uses as referred to in 7.5.5.4 bullet 2, would protect and enhance the existing area of open space and add to the attraction of the riverside area to visitors. On Map 7.12 the area forms part of the Riverside Park in which there is to be reuse/redevelopment of existing buildings. In view of the relationship of the area with the Jubilee Gardens there is no reason why it should not be dealt with separately from the redevelopment of the Water Lane car park which forms the main part of Phase 1. Recommendations are included in **MM9, MM15, MM16, and MM18** to clarify the future actions to be taken in respect of this area and to ensure that the plan is effective in this respect.
60. A further area within Site TW7 where some modification is required to ensure that the AAP is sound relates to that part shown as Phase 1 on Map 7.12 page 56. This includes the area currently in use as a car park fronting Water Lane and the derelict former public toilets. The landowner accepts that the development of the Water Lane car park should not prejudice the provision of the link to the service road through the site to join Water Lane, but would seek a partnership approach to its funding. In view of the relatively small area of land which would be available for development I find this a reasonable approach which would be most likely to achieve the delivery of the service road link, and this is adequately reflected in the designation of the service road as shown on Map 7.12 of the TAAP.
61. I identify the physical constraints which would need to be taken into account in any redevelopment of the Water Lane car park in para 38. Because of the difference in ground levels between the site and the level of Water Lane as it slopes down to the river, there would be considerable difficulties in achieving an "active frontage" at street level. Furthermore there is no evidence held by the Council to indicate any capacity for new retail development which could fund the extensive earth works which would be required to bring the site to street level, nor is there evidence of any unmet demand for the type of specialist shops favoured by the Council for this site. Indeed, there is evidence of vacant premises in Church Street which is the main focus for specialist

retailing. The Council argues that economic circumstances could change, but there is no evidence to indicate that there will be any demand for small retail units or cafés in Twickenham within the foreseeable future. In these circumstances a requirement for retail development or active frontages as part of a redevelopment of the Water Lane car park would be an obstacle to development taking place, whereas proposals in the AAP should be realistic and capable of implementation for the plan to meet the tests of being positively prepared and effective. Furthermore, the redevelopment of the car park has the potential to help deliver the extension to the service road required to achieve environmental improvements along the embankment. It therefore has an important part in helping to fulfil the council's overall objectives for the Twickenham Riverside. I note the landowner's objection to the inclusion of the service road link in Map 7.12, but provided this is shown as "potential for new service road link", it would remain a matter for negotiation between the LPA and a future developer.

62. I find that there is no reason why there should not be some flexibility within the Plan in relation to the future redevelopment of the car park. I therefore recommend modifications within **MM9, MM10, MM14, MM17, and MM18** which would allow for residential and or town centre uses on the site. The site owners would wish to specify residential development of 3-4 storeys, and there are many buildings within the vicinity of the site which are 3 or 4 storeys in height. However I accept the Council's argument that the height of the new development should depend upon the future detailed design in this sensitive location on the approach to the waterfront.
63. The other area shown on Map 7.12 as part of Phase 1 is the derelict public toilets which are in Council ownership. The site is on the corner of Water Lane and Embankment and is at the same level as the car park facing Water Lane. There is a retaining wall which rises from street level and wraps around the site with steps up to the building. The AAP seeks a comprehensive scheme for this site together with the car park. However, the sites are in separate ownerships and I find no reason why the two sites could not be appropriately redeveloped independently from one another. A redevelopment of the Water Lane car park has the potential to help deliver the service road link, and thus contribute towards planned environmental improvements. To cause delay to its implementation whilst a scheme for the toilets is agreed for the sake of a comprehensive approach which is not justified would not be in accord with a positively prepared plan.
64. For the toilet site, the plan proposes specialist retailing, boat houses or other ground floor leisure use and/or café with residential or other town houses over. However, there is no evidence of demand for any of the ground floor uses put forward in the AAP, and to develop the site at Embankment street level would require considerable earthworks and would be likely to create a site which would flood. In these circumstances the proposals for this part of site TW7 are unlikely to be realistic or effective. As for the introduction of town houses or residential above, the public toilets are single storey and this is an elevated and prominent corner site. Any increase in building height would depend on good design in such a sensitive location. Local interest groups suggest that the public toilets should be renovated to their original use, or demolished to enable a grassy bank to be formed which matches the open area on the opposite corner of Water Lane. However, there are public toilets within Jubilee Gardens and no evidence of need for further provision, and the formation of a grassed bank may not be viable. I accept that there is a need for flexibility in the type of redevelopment or reuse which might be sought for the site, and therefore propose a modification which would allow for a residential, leisure or café use. A residential redevelopment could be appropriate in the event that the site could be linked in to the Water Lane car park development, but I consider that it would be too inflexible to require that to take place. I recommend the changes incorporated in **MM10, MM15, and MM16** to include within the AAP a proposal which could be capable of implementation without causing delay to other proposals within TW7.

65. That area shown on Map 7.12 as Phase 2 comprises the relatively modern buildings of 1, 1a, and 1b King Street currently occupied mainly by Santander. The site is not immediately available for redevelopment, but the owners take a positive view of a potential future redevelopment provided that it would provide a financially viable scheme. The AAP seeks to set back any replacement building to provide a civic space on the corner of King Street and Water Lane, with an active frontage at street level and residential development above. There would be some loss of retail floorspace at ground floor level, but the landowner would find this acceptable provided adequate residential development could be built above. That would require a building of some 3-4 storeys in height. Having regard to the height of the existing buildings fronting King Street and York Street, there is potential for a well designed building of such a height to be in keeping with the townscape in this location. However, it would depend upon the design and therefore it would be inappropriate to specify the height of any future redevelopment in the AAP. I recommend the changes set out as **MM10**, **MM17**, and **MM18** to ensure that the AAP is positively prepared and effective in relation to this part of site TW7.
66. There are no specific proposal sites identified within the Heath Road Western Approach area of opportunity in the TAAP. Policies for the area are largely set out in the DMDPD, and the proposals in the TAAP seek to retain the area as a secondary shopping area for local residents, continued enhancement of the environment and encouragement of a range of uses with active frontages. The transport and environment proposals underpin these aims and are positively prepared and sound.

Issue 4 - Delivery, Phasing, Implementation, Monitoring and Review

4.1 – Are the proposals deliverable in the timescale envisaged and with the phasing proposed, including in terms of providing the necessary supporting infrastructure?

4.2 – Is the plan reasonably flexible to assist implementation and does it enable adequate monitoring and review of its effectiveness and delivery?

67. The Council has been actively engaged with a wide range of organisations as well as landowners and businesses to promote the proposals in the TAAP. A significant level of public funding has already been committed for town centre initiatives in Twickenham. The Council is working on the establishment of a Business Improvement District for the area of the AAP which would provide a sustainable source of further funding.
68. Where proposals are dependent on the release of a site by landowners, there is evidence to indicate that a number of schemes are being positively developed to bring them forward during the Plan period. Whilst the proposals for site TW2 and TW7 in particular require modification to ensure they accord with wider policy and meet the tests of soundness, in general the plan has been positively prepared to ensure that the policies of the CS and DMDPD are delivered. Clearly there is some uncertainty as to the deliverability of proposals on sites TW5, the Telephone Exchange, and TW6 the Police Station since the period for the continued use of the sites is not known. However, these buildings provide potential opportunities for redevelopment or reuse which it is appropriate to include within the AAP in the event that the buildings do become available during the Plan period.
69. With funding largely in place for the Highways and Street Scene Scheme, there is a very good prospect that the aim of the plan to improve the quality of the town centre will be achieved. The redevelopment or reuse of land or buildings which are in public ownership will depend on the Council's initiative to bring forward. In the case of TW7 there have been long delays, but with the modifications which I recommend to the AAP I am confident that a scheme capable of delivery which would be supported by the local interest groups and provide benefit to the wider community could result. I am

therefore confident that the proposals in the TAAP have a good prospect of delivery and implementation.

70. Phasing is clearly set out in the Implementation Schedule. Apart from sites TW5 and TW6 where future availability of the buildings is uncertain, and subject to the modifications which I recommend in respect of Sites TW2 and TW7, the Schedule is soundly based. The modifications also introduce sufficient flexibility to ensure that the plan as a whole is sufficiently flexible to respond to changing circumstances over the Plan period. An amendment is required to the Schedule (**MM19**) for consistency with other modifications.

71. The Council has a well established programme for monitoring adopted policies which will apply to the policies of the TAAP, and has indicated that it will review the Plan within 10 years or sooner if monitoring suggests this is necessary.

Assessment of Legal Compliance

72. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Duty to Cooperate	The Council has fully engaged with adjoining Boroughs and the relevant statutory consultees as well as with various sub-regional groupings of relevant Boroughs and organisations. It has complied with the Duty to Cooperate.
Local Development Scheme (LDS)	The Twickenham Area Action plan is identified within the approved LDS of September 2011 which sets out an expected adoption date of January 2013. The Area Action Plan content and timing are generally compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2006 with an addendum in 2009 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations Assessment has been carried out and is adequate.
National Policy	The Twickenham Area Action Plan complies with national policy except where indicated and modifications are recommended.
The London Plan	The Twickenham Area Action Plan is in general conformity with the LP.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act (as amended) and 2012 Regulations.	The Twickenham Area Action Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

73. The Plan has some deficiencies in relation to soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues identified in my report.

74. The Council has requested that I recommend main modifications to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Twickenham Area Action local plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Wendy Burden

Inspector

This report is accompanied by the Appendix containing the Main Modifications

Appendix - Main Modifications February 2013

The modifications below are expressed by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	14	New section to be added after para 2.4.43	<p>2.4.44 <i>National Planning Policy Framework</i></p> <p><i>Policy TWP SD1</i> <i>Presumption in favour of sustainable development</i></p> <p><i>When considering development proposals the Council will take a positive approach that has regard to the presumption in favour of sustainable development contained in the National Planning Policy Framework.</i></p> <p><i>Planning applications that accord with the policies in this Action Area Plan, the Core Strategy and, where relevant, with other adopted Development Plan Documents, will be approved without delay, unless material considerations indicate otherwise.</i></p> <p><i>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</i></p> <ul style="list-style-type: none"> <i>• Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</i> <i>• Specific policies in that Framework indicate that development should be restricted.</i> <p><i>The Council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</i></p> <p>Justification</p> <p><i>It is national policy that local plans follow the approach of the presumption in favour of sustainable development set out in the National Planning Policy</i></p>

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			<p><i>Framework and that policies guide how this presumption should be applied locally. The Council considers that its policies set out in this Plan, together with those in the London Plan, the Core Strategy and other Development Plan Documents will achieve sustainable development as sought by the National Planning Policy Framework. The policies are intended to enable the advancement of opportunities to meet the development needs of the Borough and are drafted so as to have sufficient flexibility to adapt to change. The National Planning Policy Framework will be a material consideration in all planning decisions, particularly where there are no policies relevant to a planning application or where policies may be out of date.</i></p>
MM2	18	3.4.2 Bullet Point 4	<p>Change to</p> <ul style="list-style-type: none"> • Twickenham Riverside – <i>enhancement of the new public park on the site of the swimming pool and of public spaces on the Embankment (upstream of Water Lane), making the most of the unique waterfront and strengthening of the retail offer on the corner of King Street/Water Lane.</i>
MM3	18	3.4.3 Bullet point 8	<p>Change to</p> <ul style="list-style-type: none"> • <i>Enhancement of the Thames riverside and encouragement and retention of existing river related and leisure uses, improving the infrastructure of the unique working waterfront and views to it, and improved linkages to the open areas up and down the river.</i>
MM4	22	4.5.2 Bullet point 1 Bullet point 5	<p>Change to:</p> <ul style="list-style-type: none"> • <i>A redevelopment of Station Yard to include public car parking if required to replace parking lost as a result of town centre improvements.</i> • <i>On street parking on Twickenham Embankment will be reviewed to allow for environmental improvements to the Embankment. The need to provide parking for the residents and businesses on Eel Pie Island will be taken into account. Disabled bays and short term servicing will be safeguarded.</i>
MM5	28	6.1 Bullet point 1	Change "would" to "could".
MM6	34	6.6.2 New para	<p>Insert: after 6.6.2</p> <p><i>Design and Accessibility</i></p>

			<i>New development and schemes in Twickenham will be subject to a number of existing policies within the Core Strategy and Development Management DPD as well as local, regional and national guidance with respect to design and access for all.</i>
MM7	41	7.2.5.8 Bullet point 9 7.2.5.10 Bullet Point 4	Add at end: <i>“and should be set back to allow the Environment Agency to gain access to the river (see also policy DMSD 8)”</i> . Delete last sentence.
MM8	43	Para 7.2.6.1, 7.2.6.2 7.2.6.3	Delete paras 7.2.6.1, and 7.2.6.2, and replace with: <u>7.2.6.1</u> <u>Aims</u> <i><u>Subject to adequate re-provision of the bus stands, to redevelop the site with a residential scheme up to 3-4 storeys from ground level. Part of the site to be developed as a public car park provided it is required to replace other parking lost from the town centre. Buildings should be of appropriate height and should integrate well with the surrounding residential area and enhance the setting of the Albany PH, with improved public realm and landscaping.</u></i> <u>7.2.6.2</u> <u>Uses</u> <i><u>Residential development up to 3-4 storeys from ground level, landscaping, and public car parking if required and feasible.</u></i> Change to: 7.2.6.3 Design Guidance The Core Strategy and Development Management DPD, Twickenham Station and surroundings DPD and Design Quality SPD will all apply. In addition the following guidance should also be followed:- <ul style="list-style-type: none"> • Height/massing should form an intermediary between that of Bridge House and surrounding development • Maximum height of 3-4 storeys from ground floor level to <i>ensure development is compatible in scale</i> to the surrounding residential area, including the Queens Road conservation area. • <i>Designed to integrate well with the surrounding residential area including the Queens Road conservation area.</i> • Excellent design to provide a positive frontage towards the Albany Public House (a Building of

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			<p>Townscape Merit) and its setting.</p> <ul style="list-style-type: none"> • <i>The opportunity should be taken to provide a small area of landscaped space to improve the area closest to the Albany PH</i> • Relocation of bus stands • High quality tree planting and other landscaping to improve the quality of the environment • <i>Public car parking will only be provided to replace any parking lost to the town centre as a result of regeneration; and will be subject to a traffic assessment.</i>
MM9	55	<p>7.5.2.3 Bullet point 2</p> <p>Bullet point 3</p> <p>New bullet point</p>	<p>Change to the following:</p> <ul style="list-style-type: none"> • <i>To strengthen the retail offer on King Street, and in Water Lane to provide for pedestrian priority with extension of existing service road across the car park to Water Lane, and redevelopment of the car park to provide for residential and/or town centre uses.</i> <p>Replace with:</p> <ul style="list-style-type: none"> • <i>To open up and redevelop/refurbish the remaining area of the former pool site which adjoins the recently refurbished Jubilee Gardens.</i> • <i>To upgrade the Embankment south of Jubilee Gardens to provide a pedestrian priority/shared surface with new landing facilities.</i>
MM10	56	Map 7.12	<p>Change as follows:</p> <p>Remove notation for <i>“Potential Relocation of parking spaces from Embankment”</i></p> <p>Show Embankment in same colour as Water Lane (i.e. shared surface/pedestrian priority) and indicate <i>“review existing parking spaces”</i> by a hatched pattern.</p> <p>Remove <i>“emergency access”</i></p> <p>Amend Phase 1 site to include notation to indicate potential for new service road link; exclude former public toilets; and to remove active frontage notation.</p>
MM11	56	7.5.3.1, Bullet point 1	<p>Change as follows:</p> <ul style="list-style-type: none"> • <i>New traffic management arrangements to reduce the impact of vehicular movements on the pedestrian environment to include a link from the service access to the rear of King Street to Water Lane, one way traffic</i>

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		Bullet point 2 Bullet point 4	<p><i>management and rearrangement or possible reduction of parking along the Embankment, provided that the function of the working waterfront would be maintained.</i></p> <ul style="list-style-type: none"> • Delete “<i>which will extend the Church Street environment</i>” and change “<i>into</i>” to “<i>in</i>” • Delete “<i>removal of most</i>” and insert “<i>rearrangement and possible reduction in</i>”
MM12	57	7.5.4.2 Bullet points 3,4,5	<p>Replace as follows:</p> <ul style="list-style-type: none"> • <i>Rearrangement or possible reduction of parking along the Embankment, provided that the function of the working waterfront would be maintained..</i> • <i>Shared surface with retention of service access and disabled parking.</i> • <i>Landscaping of the Embankment to enhance areas of public open space.</i>
MM13	57	7.5.4.3	<p>Delete bullet points and insert as follows:</p> <ul style="list-style-type: none"> • <i>Environmental improvements through implementation of shared surface with priority for pedestrians.</i> • <i>Rearrangement and possible reduction of on street parking, with retention of service access and disabled parking.</i>
MM14	58	7.5.5.2 Bullet point 2 Bullet point 4 Bullet point 6	<p>Delete “<i>and in the longer term promote some active frontage to the service road.</i>”</p> <p>Move “<i>Subject to feasibility</i>” to after “<i>and</i>”</p> <p>Change to</p> <ul style="list-style-type: none"> • <i>To improve the Water Lane and Wharf Lane links from the town centre to the Embankment as shared use spaces; to provide a link between the service road and Water Lane; and to secure the redevelopment of the car park in Water Lane with residential and/or town centre uses.</i>
MM15	59	Additional plan	<p><u>Insert</u> <i>an additional simple plan to indicate the areas referred to in 7.5.5.4 and 7.5.5.5</i></p>
MM16	59	7.5.5.4, Bullet point 1 Bullet point 4	<p><u>Delete:</u> “<i>and including some carefully landscaped car parking off the service road area to enable relocation from the Embankment.</i>”</p> <p>Change to:</p> <ul style="list-style-type: none"> • <i>Redevelopment or reuse of former public toilets fronting Water Lane for residential, leisure or café use.</i>
MM17	59	7.5.5.5, Bullet point 1	<p>Change to</p> <ul style="list-style-type: none"> • <i>Redevelopment or partial redevelopment of 1,</i>

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		Bullet point 2	<p><i>1a and 1b King Street with setback or inset to create a public square or other civic space with active frontage at ground floor level and residential development above of a height and design appropriate to the location of the site.</i></p> <p>Change to.</p> <ul style="list-style-type: none"> • <i>Redevelopment of the car park in Water Lane with residential and/or town centre uses together with the continuation of the service road between Water Lane and Wharf Lane.</i>
MM18	60	<p>7.5.5.6, Bullet point 2</p> <p>Bullet point 3</p> <p>Bullet point 6</p> <p>Bullet point 7</p>	<p>Delete “<i>Create riverside park</i>” and insert “<i>Enhance and extend Diamond Jubilee Gardens</i>”</p> <p>Change to:</p> <ul style="list-style-type: none"> • <i>Along the Embankment to upgrade the areas of open space, create a pedestrian priority area and review the car parking provision.</i> <p>Change to</p> <ul style="list-style-type: none"> • <i>Development on Water Lane frontage to complement existing residential development and to include town centre uses where feasible.</i> <p>Change to</p> <ul style="list-style-type: none"> • <i>Future redevelopment of 1, 1a, and 1b King Street to include set back of building at junction with Water Lane to create enhanced public space with views towards the river where possible.</i>
MM19	72	Implementation Schedule, page 72 TW2	<p>Change description in column 1 to: <i>Residential development of 3-4 storeys from ground level and appropriate landscaping, with public car parking if required to replace spaces lost to the town centre</i></p> <p>Change delivery strategy (column 4) to: <i>LBRuT to work with landowners to bring forward the redevelopment of the site and associated landscaping</i></p> <p>Delete reference to “<i>car park</i>” in column 6</p>