

Lucy Thatcher
London Borough of Richmond
Planning
Civic Centre
44 York Street
Twickenham
TW1 3BZ

08 May 2017
Ref: SS/Let/P1419

Dear Ms. Thatcher

Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended).

Formal request for screening opinion for mixed use redevelopment of the Twickenham Riverside site.

We are writing to you following our pre-application meeting of 04 April 2017 on behalf of our clients, London Borough of Richmond, to make a formal request for a Screening Opinion under Regulation 5 of the Town & Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 2011 (as amended).

We include the following information:

- a) A plan identifying the land;
- b) A brief description of the nature and purpose of the development and of its possible effects on the environment.

As set out within this letter, it is our view that an Environmental Impact Assessment (EIA) would not be required to accompany a planning application for development on the site. However, we are formally writing to the Council to request that the proposal is screened for completeness.

Directors

Chris Barker MATP MRTPI Managing Director
Huw James MRTPI
Adam King RIBA

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The Site

The site is located in the centre of Twickenham on land occupying frontages to three roads – Kings Street, Water Lane and The Embankment.

On Kings Street, the site includes premises at 1, 1A, and 1B King Street (currently occupied by Santander, M&Co, Superdrug). Unit 2/4 Water Lane is included within the site boundary and is also occupied by Santander since the bank has a frontage on both streets.

The site also includes the private car park to the rear of the units fronting Kings Road in addition to the former swimming pool buildings on the riverside land fronting The Embankment.

Figure 1 identifies the site boundaries although it is anticipated that the application area will be of a reduced scale than that illustrated below. This larger area has been included as part of the screening exercise for completeness and to ensure that the site and any associated proposals would not be considered EIA development when considered cumulatively.

The total area of the site in Figure 1 is 1.4ha.

The site is a brownfield land and recycling of such sites is encouraged through the National Planning Policy Framework.

The site is partially at risk of flooding on its southern extreme and is also located within the Twickenham Riverside Conservation Area. The proposal will need to be mindful of these important constraints and designations.

To the south of the site adopted Core Strategy policies CP12 River Crane Corridor and CP4 Biodiversity apply and subsequently riverside proposals will be required improve biodiversity. Riverside proposals will need to ensure that there is no impact on these designations.

Whilst these constraints pose challenges to the design of any future scheme, the site has long been established and recognised as a key regeneration opportunity by the London Borough of Richmond and has been allocated as such within the adopted Twickenham Area Action Plan (TAAP).

Subsequently the site has been included as part of a wider area referred to within the TAAP as Twickenham Riverside for the following uses (please refer to the corresponding plan – Figure 2):

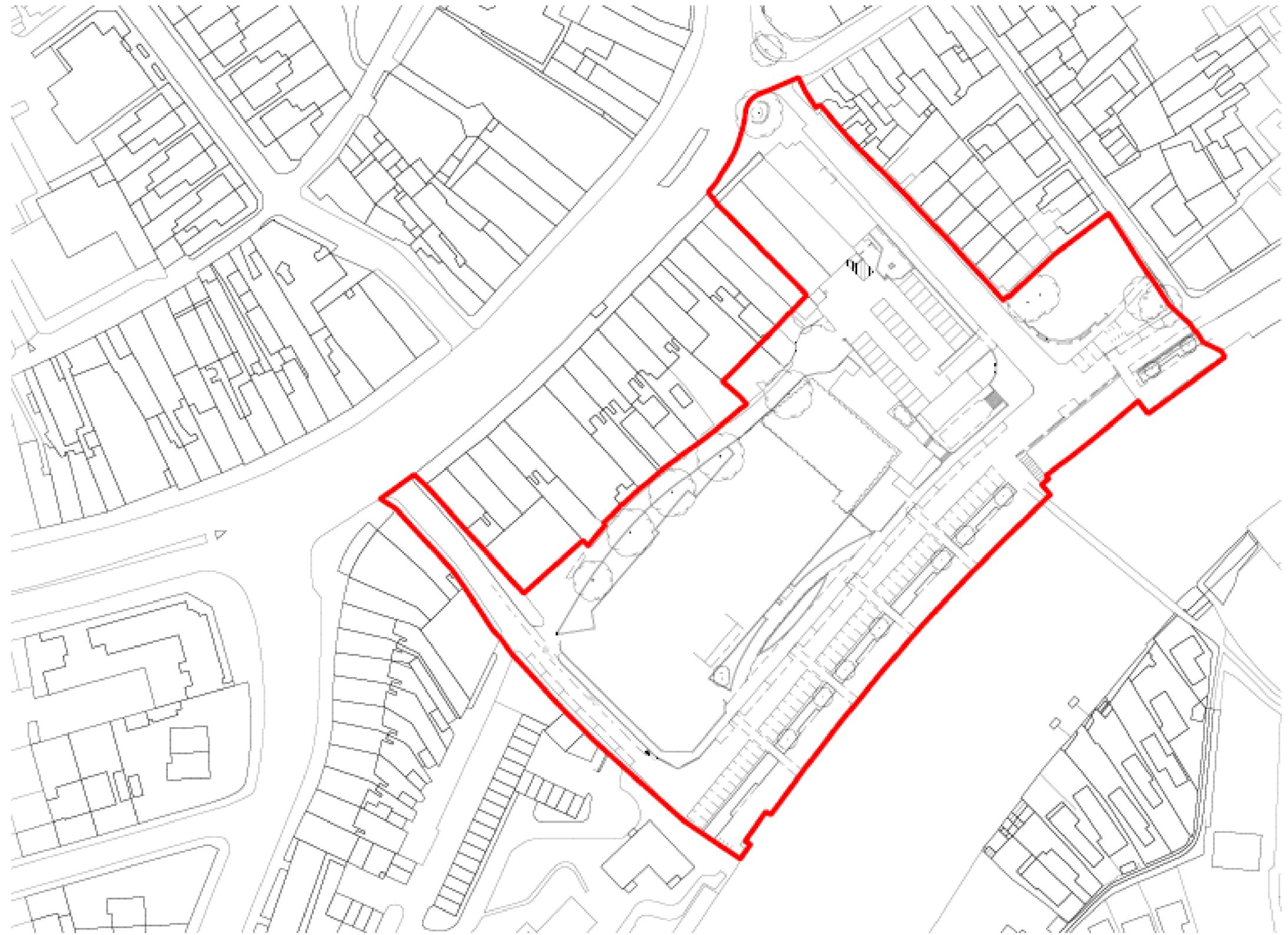


Figure 1: Site and Proposed Layout

(A) Open space (excluding the area where there are currently buildings), a mixture of hard and soft landscaping to allow a variety of leisure activities, playground and café;

(B) Reuse or replacement of existing buildings to provide mixed uses with active frontages at ground floor level;

(C) In long-term, subject to agreement of the community, potential low rise leisure and community pavilions closer to the service road area, to enliven the area and allow public enjoyment of the riverside open space;

(D) Redevelopment or reuse of former public toilets fronting Water Lane for residential, leisure or café use;

(E) Redevelopment or partial redevelopment of 1, 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;

(F) 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.

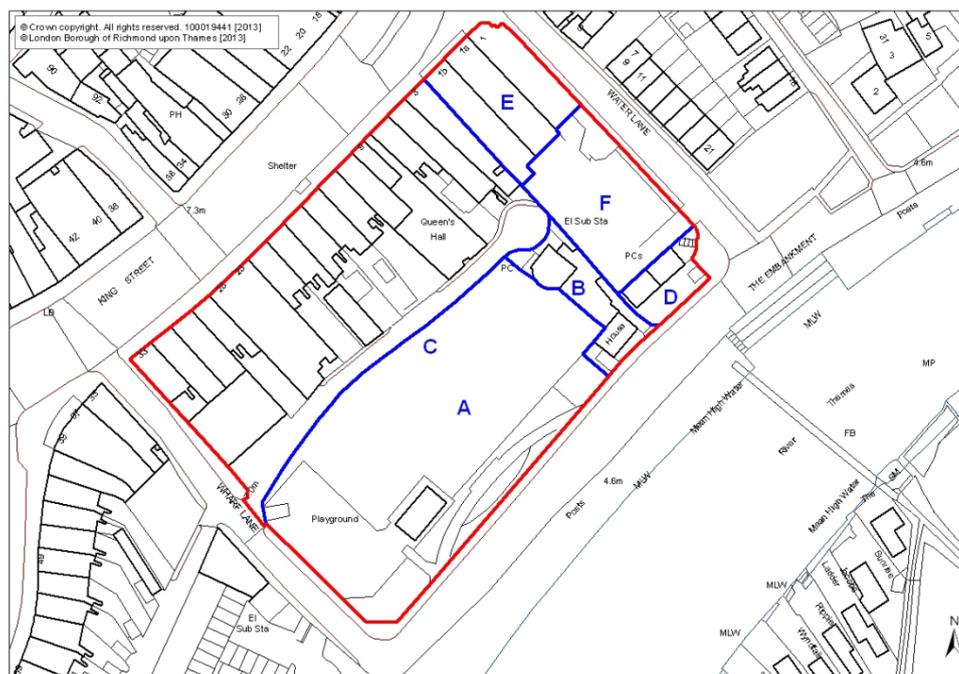


Figure 2: TAAP: Twickenham Riverside Site

The Proposal

In line with the requirements to provide vibrant and active frontages within the TAAP, the proposed redevelopment seeks to provide for new commercial floor space on the ground floor comprising A1, A2 and A3 with the inclusion of some B1 incubator space totalling an area of no more than 1500 m2.

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Residential uses are proposed on upper floors with the provision of up to a maximum of 50 units comprising a mix of one, two and three bedroom units.

The proposed development ranges in height with a maximum of four storeys. The overall height of the buildings will be no more than circa 22m.

The proposal also seeks to deliver substantial public realm enhancements to improve the pedestrian links from Kings Street to The Embankment (via Water Lane) and through to the Diamond Jubilee Gardens. Public open space / performance space for community uses are also proposed.

The development will be of high architectural quality and will be designed to be in-keeping with the character of the surrounding area whilst also being mindful of the nearby heritage assets including the Conservation Area.

Significant enhancements will be made to the existing hard and soft landscaping within the site.

The site will be protected from flood risk by virtue of the proposed elevated position above the predicted flood level. In this respect, finished ground floor levels for commercial development will be around 7.7m AOD with first, second and third floor residential accommodation above.

An underground basement car park is however proposed to provide for no more than 55 car parking spaces, which sits below this flood level. Surface car parking near the site will also be rationalised to address both existing and future demands.

Servicing and delivery of the scheme will be secured via both Water Lane to the east and the service road from Wharf Lane to the west.

EIA Development

The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) provide clarity on which applications should be accompanied by an EIA. The first step is to determine whether the application is a Schedule 1 or Schedule 2 form of development.

In this regard, the proposed development does not fall within the description of development as set out within Schedule 1 of the Regulations.

For a proposal to be considered EIA development with respects to Schedule 2, it must:

- a) be located wholly or part in a 'sensitive area' as identified in Regulation 2(1); or
- b) meet one of the relevant criteria, or exceeds on the relevant thresholds listed in the second column of the Table in Schedule 2.

Firstly the site is not located within a 'sensitive area' as defined by the 2 (1) of the Regulations.

In relation to b) above, the application proposal falls within 10 (b) 'urban development projects' of Schedule 2. The second column of that table stipulates the applicable thresholds and criteria which need to be met for the development to be considered EIA development as follows:

(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or

(ii) the development includes more than 150 dwellings; or

(iii) the overall area of the development exceeds 5 hectares

In this regard, the proposed development would not meet any of the thresholds set out within the criteria noted above and therefore would not be considered EIA development.

The effects of the development in our view would not be significant given the proposed quantum, uses and location of the development. It would not therefore warrant the accompaniment of an EIA.

Notwithstanding this point, the proposed development will be accompanied by a comprehensive set of plans, reports, studies and assessments as follows and in addition to any other reports considered necessary by the Local Planning Authority:

Planning Statement

Statement of Community Involvement

Commercial Report

Plans & Elevations

Rendered Images

Design & Access Statement

Inclusive Access Statement

Wheelchair Housing Statement

Landscape Strategy/Open Space Assessment

Viability Report

Flood Risk Assessment & Foul and Surface Drainage Strategy/SUDS

Sustainability/Energy Strategy/BREEAM pre assessment

Daylight/Sunlight Report

Ecology Report/Bats etc

Arboricultural Survey - AIA

Heritage/Archaeology Report/Standing Buildings Survey

Transport Statement/Travel Plan

Air Quality Statement

Acoustic Assessment

Construction Management Statement

Health Impact Statement (Within PS)

Land Contamination

Lighting Strategy

Retail Impact Study

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In combination, these reports will fully assess any potential impact and further seek to mitigate impact where required.

In conclusion, it is our view that the proposal would not meet the basic criteria for inclusion as EIA development. Furthermore, whilst the proposal seeks an intensification of uses on the site it is not of a scale, significance or sensitive location which would warrant accompaniment of an EIA. The potential impacts will be minimal and in any event would be diminished through appropriate amelioration and mitigation measures.

If you have any further queries or require further information please contact me on 01903 248777.

Yours sincerely
ECE Planning

A handwritten signature in black ink, appearing to read 'C. Barker', is positioned above the typed name.

Chris Barker MATP MRTPI
Managing Director
Encs