

Twickenham Riverside Planning Statement



Design Team

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Sustainability Consultant	Method Consulting
Accessibility Consultant	Lord Consultants
Fire Consultant	FDS Consult UK
Ecology Consultant	BSG Ecology
Arboricultural Consultant	Thomson Environmental Consultants
Daylight & Sunlight Consultant	GIA Chartered Surveyors
Acoustic Consultant	TetraTech
Air Quality Consultant	Entran
Land Contamination Consultant	Geosphere Environmental
Archaeological Consultant	AOC Archaeology Group
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Planning Statement

Twickenham Riverside, Twickenham, TW1 3SD

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1. Introduction

1.1 This planning statement is submitted in support of an application for full planning permission made by London Borough of Richmond Upon Thames ('the Applicant') in regard to 1, 1A, 1B and 1 King Street, 2-4 Water Lane, The Embankment and river wall, Water Lane, Wharf Lane and the Diamond Jubilee Gardens, Twickenham, London, TW1 3SD ('the Site').

1.2 The application is made in accordance with Section 316 of the Town and Country Planning Act 1990 which makes statutory provisions for development of land by interested planning authorities.

1.3 Full planning permission is sought for the following proposed development at the Site, hereafter known as 'the Proposed Development':

"Demolition of existing buildings and structures and redevelopment of the site comprising residential (Use Class C3), ground floor commercial/retail/cafe (Use Class E), and public house (Sui Generis), boathouse locker storage and floating pontoon and floating ecosystems with associated landscaping, reprovision of Diamond Jubilee Gardens and other relevant works."

1.4 The Proposed Development seeks to provide 45 residential units in the Site with two buildings ranging from 1 to 5 storeys and 1,387 sqm of non-residential floorspace comprising retail, office, retail, café and restaurant /public house. The Site is situated within the administrative boundary of the London Borough of Richmond upon Thames ('LBRuT').

1.5 Following a Twickenham Riverside design competition in 2019, the Applicant appointed a multi-disciplinary team led by Hopkins Architects to bring forward proposals for the redevelopment of the Site. The Applicant's core objectives for the project are to:

- Deliver a compelling contribution to the architectural heritage of Twickenham
- Strengthen the green character of Richmond upon Thames by enhancing the public realm through careful design
- Create an exciting destination for residents and visitors that champions the river and builds upon Twickenham's identity
- Provide a creative solution and riverfront experience which prioritises people over cars
- Deliver affordable housing for those who need it
- Achieve the objectives of the Twickenham Area Action Plan

1.6 This planning statement assesses the Proposed Development against relevant planning policy and guidance and with regard to relevant material considerations, as per Section 38 (6) of the Planning and Compulsory Purchase Act (2004).

1.7 This planning statement continues under the following sections:

- Section 2 provides a description of the Site and the surrounding area
- Section 3 outlines the relevant planning history of the Site
- Section 4 outlines the pre-application engagement
- Section 5 sets out the Proposed Development
- Section 6 sets out the relevant planning policy framework

- Section 7 examines the main planning and design considerations in the determination of the application
- Section 8 summarises the CIL liability
- Section 9 concludes the Planning Statement

1.8 This application for full planning permission is supported by this Planning Statement as well as the following documents:

- Cover Letter – prepared by Savills (Planning Consultant);
- Community Infrastructure Levy Additional Questions Form – prepared by Savills (Planning Consultant);
- Health Impact Statement – prepared by Savills (Planning Consultant);
- Design & Access Statement including Landscape/Public Realm – prepared by Hopkins and LDA
- Urban Greening Factor – prepared by LDA (Landscape Architect);
- Daylight / Sunlight / Overshadowing Report – prepared by Hopkins and GIA (Architect and Surveyor, respectively);
- Arboricultural Survey / Impact Assessment / Method Statement – prepared by Thomson (Arboriculture Consultant);
- Heritage Statement – prepared by Icen Projects (Heritage Planning Consultant);
- Air Quality Assessment – prepared by (Entran Ltd)
- Framework Odour Assessment – prepared by Skelly & Couch (Mechanical & Electrical Engineers);
- GLA 'Be Seen' Energy Monitoring – prepared by Skelly & Couch (Mechanical & Electrical Engineers);
- Energy Assessment – prepared by Skelly & Couch (Mechanical & Electrical Engineers);
- Sustainable Construction Checklist – prepared by Method Consulting (Sustainability Consultant);
- BREEAM Pre-Assessment – prepared by Method Consulting (Sustainability Consultant);
- Flood Risk Assessment – prepared by Webb Yates (Structural & Civil Engineers);
- Flood Emergency Plan – prepared by Webb Yates (Structural & Civil Engineers);
- Groundwater and Throughflow Flooding Assessment – prepared by Webb Yates (Structural & Civil Engineers);
- Screening Assessment – prepared by Webb Yates (Structural & Civil Engineers);
- Basement Impact Assessment – prepared by Webb Yates (Structural & Civil Engineers);
- London Sustainable Drainage Proforma – prepared by Webb Yates (Structural & Civil Engineers);
- Statement on Sustainable Drainage Systems – prepared by Webb Yates (Structural & Civil Engineers);
- Land Contamination Report – prepared by Geosphere Environmental and Webb Yates (Site Investigation Surveyor and Structural & Civil Engineers, respectively);
- Foul Sewage and Utilities Statement – prepared by Webb Yates (Structural & Civil Engineers);
- Archaeological Statement – prepared by AOC Archaeology Group (Archaeological Consultant);
- Community Engagement Report – prepared by LBRuT and Savills (Local Planning Authority and Planning Consultant, respectively);
- Affordable Housing Statement Viability Report – prepared by LBRuT and Lambert Smith Hampton (the Applicant and Valuation Appraiser, respectively);
- Transport Assessment – prepared by WSP (Transport Consultant);
- Travel Plan – prepared by WSP (Transport Consultant);
- Servicing and Delivery Management Plan – prepared by WSP (Transport Consultant);
- Ecology Report, including Bat Survey – prepared by BSG Ecology (Ecologist);
- Ecological Enhancement Statement – prepared by BSG Ecology (Ecologist);
- Acoustic Assessment – prepared by WYG Group (Acoustic Consultant);
- Framework Construction Management Statement, including a Waste Management Plan – prepared by Arcadis (Project Manager);

- Fire Statement – prepared by FDS Consulting (Fire Consultant); and
- Fire Safety Strategy – prepared by FDS Consulting (Fire Consultant).

2. Site and Surroundings

- 2.1 The Site is located by the River Thames on the northern embankment of Twickenham. The Site sits within the administrative boundary of London Borough of Richmond upon Thames (LBRuT) and extends approximately 1.34 hectares, consisting of a mixture of vacant and derelict structures (associated with the former public swimming pool), retail and office use (at the northern edge of the Site), a private car park, areas of public amenity space and the river.
- 2.2 The Site is centrally located within the town centre of Twickenham and is bounded by King Street to the north. To the east is Water Lane, characterised predominantly by residential uses with a range of other town centre uses and public open space. The Diamond Jubilee Gardens is located to the west of the Site and the Embankment and River Thames to the south (with Eel Pie Island further south over the footbridge).

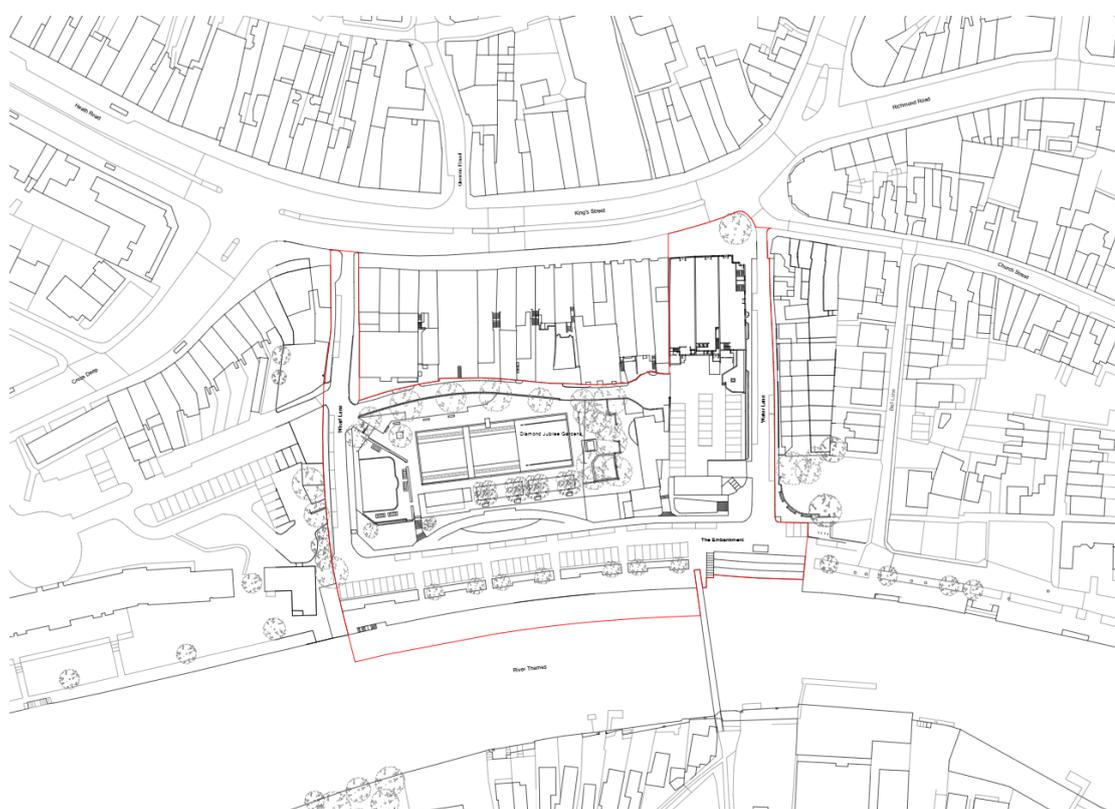


Figure 1. Existing Site Plan

- 2.3 The Site is within the Twickenham Riverside Conservation Area (CA); opposite Queens Road CA and within the setting of listed buildings (10-12 King Street and Barclays Bank) and Buildings of Townscape Merit (BTMs), 31-33 Church Street; 9-21 Water Lane; 16-22 King Street; and a number of properties on Eel Pie Island.
- 2.4 A Grade II Listed Telephone Kiosk is situated at the north-eastern corner of the Site. The Site is also within Twickenham and Marble Hill Archaeological Priority Area.

- 2.5 The Site's Public Transport Accessibility Level (PTAL) rating is part 5 and part 6a, meaning the Site is highly accessible to/from public transport. Twickenham Railway Station is approximately 500m to the north. The station is served by National Rail services, providing links to London Waterloo, Reading, Windsor and Eton Riverside.
- 2.6 The Site is also served by bus stop at Cross Deep to the west of the Site, providing connection to numerous key locations such as Twickenham Town Centre, Twickenham Train Station, Hammersmith, Heathrow Terminal 5 and Hounslow.
- 2.7 There are currently 78 car parking spaces and 3 cycle parking stands in the Site.
- 2.8 According to the Environmental Agency's online flood mapping tool, the Site is located within Flood Zones 2 and 3 but is in an area benefitting from flood defences. The risk of tidal and fluvial flood is high. The site is also a critical drainage area, in area susceptible to ground water flooding, at risk of surface water flooding and a throughflow catchment area.
- 2.9 Commercial units at 1, 1A and 1B King Street are within Key Shopping Frontage and within an Article 4 Direction Area, removing permitted development rights for the change of use from shops (Class A1/E) to financial and professional services (Class A2/E) and offices (Class B1(a)/E) to residential uses (Class C3).
- 2.10 The south eastern corner of the site and the River Thames is Metropolitan Open Land.
- 2.11 LBRuT's online records indicate there are no known Tree Preservation Orders (TPO) on the Site.

The Surrounding Context

- 2.12 The Site is located within the Twickenham Town Centre and is bound by commercial units at the northern edge along King Street (which has residential above), residential uses to the east and west, and Eel Pie Island to the south of the site across the footbridge. Surrounding land uses include residential (Use Class C3), hotel use (Use Class C1) as well as retail and offices (Use Class E).
- 2.13 An analysis of existing land uses at the Site and in the surrounding area is presented in Figure 2.



Figure 2. Site and Surrounding Area Ground Floor Land Uses

3. Planning History

3.1 A desktop based search of the Council's planning register shows the Site's extensive planning history. The applications shown below are the most relevant applications at the Site.

Site planning history

3.2 The table below illustrates the Site's relevant planning history.

Table 1. Planning history

Address	Planning Reference	Description of Development	Decision + Decision Date
Twickenham Baths, The Embankment, Twickenham	12/0719/FUL	Proposals for Twickenham Swimming Pool; Bath House, Cafe Building and Toilets. Refurbishment and Additional Accommodation. Extensions and modifications to existing buildings; new hard and soft landscaping; new cafe, community uses, toilets.	Withdrawn (30/08/2019)
9 King Street, Twickenham, TW1 3SD	13/2270/FUL	Partial demolition of existing building and redevelopment/conversion on ground to third floor levels for a mixed use scheme comprising Class D2 Assembly and Leisure Use together with 2no. two bed flats and 2no. one bed flats.	Approved (03/01/2014)
9 King Street, Twickenham, TW1 3SD	11/3695/FUL	Partial demolition of existing building and redevelopment/conversion at ground to fourth floor levels for a mixed use scheme with D2 Assembly and Leisure, 4no. two bed flats and 1no. one bed flat and alterations to access and the provision of 2no. car parking spaces.	Refused (09/01/2012). Appeal dismissed (27/12/2012)
Twickenham Baths, The Embankment, Twickenham	10/2202/VRC	Renewal of temporary planning permission 09/1499/FUL for a further 2 years which was a temporary renewal for 03/1141/FUL and 05/0251/FUL.	Approved (22/11/2010)

Syds Quay And Sans Souci Eel Pie Island, Twickenham	10/1095/FUL	Demolition of the existing buildings and erection of a 2-storey building to replace Syds Quay comprising 4 no. B1 use class units and 3 no. 1-bedroom flats, one studio and a 2-bedroom dwelling to replace San Souci.	Approved (28/10/2011)
Twickenham Pool Site The Embankment Twickenham TW1	09/1499/FUL	Renewal of planning permission for one year temporary period in respect of: Play area and gardens (03/1141/FUL) and Cafe (05/0251/FUL).	Approved (14/09/2009)
Twickenham Pool Site, The Embankment, Twickenham	09/0914/FUL	The re-creation, by the use of hard and soft landscaping, of the currently derelict part of the old swimming pool site to form public open space, including a scent garden, public square, shrub lined walks and landscaped areas for a variety of open air activities.	Approved (14/02/2011)
Land At Bell Lane And Water Lane, Twickenham, Middlesex	08/4839/FUL	Erection of 2, two and a half storey houses (100% affordable housing); one five bed/eight person and one four bed/seven person	Approved (09/12/2009)
Twickenham Pool Site, The Embankment, Twickenham	05/0251/FUL	Erection of a single storey cafe with external works.	Approved (17/03/2005)
Twickenham Pool Site, The Embankment, Twickenham Richmond Upon Thames TW1 3DX	03/1141/FUL	Demolition Of Pool Building (plant/changing Rooms And Entrance Space) Hard And Soft Landscaping Of Resultant Footprint. Partial Clearance Of Poolside Lido To Form Park And Children's Play Area Secured By Fencing. Steps From Lower To Upper Area.	Approved (31/07/2003). Appeal allowed (on 16/06/2004)
Twickenham Pool Site, The Embankment, Twickenham	03/1142/CAC	Total Demolition Of Pool Changing And Plant Rooms With exception Of Retaining Wall At Rear Ground Floor	Appeal allowed (on 16/06/2004)
Car Park Site, Water Lane, Twickenham	96/3928	Erection Of Six Houses And Two One Bedroom Self-Contained Flats And New Road.	Approved (15/04/1997)

Withdrawn application (Ref: 17/4213/FUL)

3.3 In 2017, this planning application sought full planning permission for:

“Full planning application for the demolition and removal of all existing buildings and structures and redevelopment with a mixed use development of the site at 1, 1A, 1B and 1C King Street and 2/4 Water Lane; the site of the remaining former swimming pool buildings at the corner of Water Lane and The Embankment; and the river facing parcel of land on The Embankment in front of Diamond Jubilee Gardens. The development proposals comprise: Two 3-4 storey buildings with a partial lower ground floor and a raised walkway to link the two buildings; three seasonal units (201m²) at Lower Ground Floor level; 505m² A3 floor space, 250m² B1 floor space, 244m² A1 floor space and 62m² flexible commercial at ground floor level (either A1/A3/D1); 39 residential apartments at first, second and third floors (18 no. 1 bedroom, 19 no. 2 bedroom and 2 no. 3 bedroom, including six no. affordable homes) and raised roof terrace; new public square / areas of public realm throughout the site; a Lower Ground Floor car park with new vehicular access from The Embankment consisting of 23 car parking spaces and cycle storage; reconfiguration of street parking in the roads immediately adjacent to the Site and associated highway / footway works; amended pedestrian access and landscaping to the South of Diamond Jubilee Gardens; and amendment of service vehicle access to the service road at the rear of Diamond Jubilee Gardens.”

3.4 The application was recommended for approval by officers and members agreed a resolution to grant consent. The application was referred to the National Planning Casework Unit following an objection from the Environment Agency. However, the applicant then decided to withdraw the scheme in response to a change in administration.

EIA Screening - 7 May 2020

3.5 A formal EIA Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (EIA Regulations) concluded that the LPA did not consider that the screened development required an EIA.

3.6 While the Proposed Development proposes a larger site area than the screened development, the development metrics remain below the relevant thresholds for EIA development and are also below the those of the screened development. The proposed site area at 1.34ha remains significantly below the 5ha threshold set out in Schedule 2 of the EIA regulations and the indicative thresholds described in national guidance. The number of residential units has reduced from 54 to 45 and the amount of commercial floorspace has reduced from 2,750 sqm to 1,363 sqm. The area of urban development not including dwellinghouse development has reduced from 0.25ha in the screened development to 0.14ha in the Proposed Development. As a result, the EIA has already assessed a worse case and more intensive development meaning that the conclusions of the Screening exercise are still relevant and applicable to the Proposed Development.

3.7 The Proposed Development remains a Schedule 2 development and while the red line site boundary extends beyond the river wall, the site is still not a sensitive area as defined by the EIA regulations.

4. Pre-Application Engagement

- 4.1 The Proposed Development has been subject to extensive pre-application discussions between the Applicant and the LBRuT. These pre-application discussions focused on a variety of topics and began in July 2020 through to June 2021. Table 2 outlines the pre-application meeting date and central discussion topic.

Table 2. Schedule of Pre-Application Meetings

Pre-Application Meeting	Meeting Topic	Commentary
20 July 2020	Introduction and Principle of Development	Officers were provided with an overview of the Hopkins competition masterplan. Initial feedback was provided on the housing mix and the appropriateness of smaller units in this town centre location as well advice on tree planting, surface treatments, sustainability targets and flood defences.
09 September 2020	Energy	Initial overview of the energy and sustainability strategies including proposals for carbon emissions reductions and projected improvement over Part L; Be Lean, Be Clean, Be Green strategies; heating and air quality.
20 November 2020	Masterplan update	Masterplan update, following separate engagement with the Environment Agency ('EA') and re-design of the competition masterplan to take account of EA flood storage requirements. In post-meeting correspondence, officers commented that the proposed Wharf Lane building was at a sufficient separating distance to avoid unacceptable impacts. On Water Lane officers commented that the proposed building was not materially worse than the relationship of the proposed building contained within the withdrawn application
30 November 2021	Affordable housing workshop	Workshop with the Council's Housing team on affordable unit mix, design and strategy for engagement with Registered Providers and GLA funding rounds.

24 February 2021	Housing mix and layout	Presentation to planning and housing team on updated unit mix and layout to increase number of larger units within the affordable tenure and increase number of smaller units within the market tenure. Officers were generally satisfied with the unit mix noting it was appropriate for the Site's town centre location.
16 March 2021	Landscape, Public Realm and Transport	Updates on landscape design and scoping for the Transport Assessment.
7 April 2021	Townscape and Building Design	Design development
May 25 th + June 23 rd 2021	Landscape, Public Realm and Ecology	Update to officers on the landscape design development, follow up discussions about the Ecology survey report and proposals for Ecological enhancements
June 4 th 2021	Townscape – Building Design 2	Further updates to façade/elevation detailing

4.2 Two public consultation events were held virtually (due to the Covid-19 pandemic) between January-February 2021. A detailed commentary on the public consultation and a summary of the comments received is set out in the Statement of Community Involvement, which has been submitted to accompany this planning application.

4.3 The Applicant received over 800 responses to the public consultation where 16 questions were asked of respondents on issues such as the overall design and use of the Proposed Development among other things. The consultation events were promoted through posting flyers to all 23,245 addresses within the TW1 postcode, social media, council e-newsletter and website, among others.

4.4 Figure 3 shows that the majority of consultation respondents stated they would be more likely to visit the riverside once the Proposed Development has been delivered.

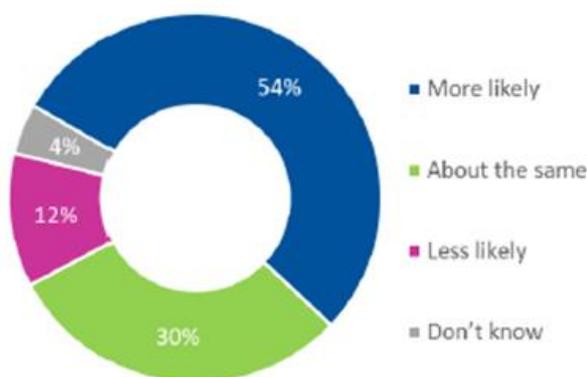


Figure 3 Response to Public Consultation Question

4.5 During the public consultation 685 positive comments were received from respondents. These are summarised below and are non-exhaustive:

- Support for the open space / additional open space (22%)

- Support for the lack of riverside parking and the pedestrianisation of the current car parking area (27%)
- Respondents supported the pontoon / boathouse / boat storage (3%)
- Support for easy access to the River and its views (15%)
- Supports the architectural style and design of the Proposed Development (12%)
- Support for the event/community space which is likely to encourage more events (14%)

4.6 During the public consultation 581 negative comments were received from respondents. These are summarised below and are non-exhaustive:

- Concern for where current cars / Eel Pie Island cars will go / not enough parking (20%)
- Concerned that too many flats are being proposed (5%)
- Concerned about lack of public toilets (2%)
- Concerned the Proposed Development does not provide a focal point to Twickenham and does not connect the river to the high street (3%)
- Concerned there is not enough grass/greenery (4%)
- Concerned about the architecture style (15%)
- Concerned there is too much retail being proposed / already too many vacant units in Twickenham (12%)

4.7 Further to the pre-application meetings outlined in Table 2, the Applicant team engaged the Council's Design Review Panel ('DRP') on two separate occasions. The first DRP meeting was held on April 13th 2021 with a follow up session held on June 9th 2021.

4.8 Following the first DRP session, the DRP comments can be summarised as follows:

Water Lane

- The general consensus that large buildings set within landscaping can be successful and most panellists agreed that interventions to break the roofline and provide contrasting elevational treatments would not be welcomed (in contrast to views expressed by officers at the 7 April pre-application meeting). There was support for a strong linear roofline and the principle of there being prominence for the King Street building to mark the site and the route down to riverfront. One panellist emphasised the need for King Street to have some distinction and not "fit in" with the existing context too much. Panellists remarked on the existing context and noted the presence of warehouses and boat making activities around the site. A number of the panellists remarked that Hopkins' competition philosophy needed strengthening (acknowledging technical and stakeholder constraints). Panellists felt that the architecture and detailing ought to take cues from this and that the scheme should take a "confident 21st century" approach. In that vein, proposals for the use of concrete on Wharf Lane were well received. Finger Wharf in Sydney was mentioned as an example of a successful long façade.

Wharf Lane

- There was some discussion around the courtyard space around the pub and a feeling that this space is still undefined particularly where there are considerations around back of house functions and risks of ASB. There was a feeling that the pub building looks “lost” and that opportunities should be taken to make this part of the scheme even more “special”, particularly in terms of the public realm surrounding the pub. There was some discussion around the north east façade (garden facing) and some concern was noted about single aspect while it was acknowledged that there are also considerations around privacy. Panellists acknowledged that the façade design was ongoing and the rationale for the glazed wall. One panellist questioned if some windows could be provided with a clear outlook on to the space even if this is from corridors where there could be opportunities to create social gathering spaces and provide an outlook out to the river.

The Landscape

- There was agreement that the “bare bones” of the landscape strategy are right but that the design needs to “go on a journey”. The programme for submission of the planning application was remarked on in this context and the Chair was keen that the design team see the DRP for a follow up – particularly to talk through the landscape. Panellists acknowledged the complexity of the flooding constraints but noted that efforts to keep things out of the floodplain had created pinch points. There was a feeling that the landscape consists of a number of “rooms” and that these need to be brought together as a more coherent singular piece with constituent parts. The Chair felt that the triangular space between the petanque and lawn was the main destination space and that this needed defining. The Chair felt strongly that the route down to the water front from Wharf Lane through the buildings needed clarifying. There was some discussion around “leaky” spaces – particularly to the north adjacent to the service road and the gate area between the playground and the café. There were also comments about the amount of green space relative to hard surfacing and a feeling that the external space needed greening.

4.9 A follow-up session with the DRP was held in early June 2021. Comments can be summarised as follows, though this is non-exhaustive:

General Concept Design

- The panel welcomed the improvements to the design, particularly noting the improvement to the Wharf Lane building design and the boathouse storage area of the Proposed Development compared to the first DRP meeting. The panel also supported the continued development of the Water Lane building but suggested the building still requires “finesse” for the building to improve its relationship to the river. Further development of the landscape design was encouraged by the panel to provide a river frontage along the River Thames and a more pronounced public realm arrangement focused around an active and vibrant space.

Water Lane

- The panel supported the industrial aesthetic being incorporated into the King Street elevation of the Proposed Development, though they advised the King Street frontage requires further design development to be resolved. Panellists encouraged the design team to consider architectural treatments such as awnings and signage to provide shade and avoid “add-ons” which might undermine the original design quality. Panellists emphasised the building’s responsibility to positively contribute and be respectful to its historic setting, at the junction of King Street, Church Street and Water Lane.

Wharf Lane

- Panellists felt this building was far more resolved than its previous iteration by its reconfiguration of the courtyard space which was better utilised through entrance to the pavilion. The panel advised relocating the kitchen from the ground floor to the basement. The panel queried whether the public house/restaurant could include a mezzanine capable of opening up to views outward to the river. There was some discussion around the river elevation of the building insofar as panellists felt the lack of projecting balconies were a missed opportunity on this side of the Proposed Development. The panel welcomed the proposed boathouse storage and its contribution to the design, but suggested it could still be bolder in its design and materiality. There was also general discussion surrounding introducing a mobile concession in the southwest corner of the Site to assist in activating that area of the Proposed Development – though panellists did note this may not be possible due to flooding constraints.

Landscape and Public Realm

- Panellists generally welcomed the updated design's more generous approach to the public realm and particularly supported the relocation of the existing Black Poplar tree to become a focal-point within the Proposed Development. The panel raised some concern around pedestrian route into the Site from the southern side of the River Thames through Eel Pie Island, commenting there was no clear direct route. General consensus was raised around the need to include more cycle parking across the Site to accommodate the level of demand/popularity the Proposed Development is expected to have. The Chair of the panel advised the Proposed Development still needed to go further in terms of its urban greening factor, considering the potential of the Site.

5. The Proposed Development

5.1 The Proposed Development seeks to demolish all existing buildings and structures on site and deliver a mixed use scheme of 45 residential apartments, new commercial and retail uses at ground floor and enhancements to public realm including the reprovision of Diamond Jubilee Gardens.

5.2 The description of development is as follows:

'Demolition of existing buildings and structures and redevelopment of the site comprising residential (Use Class C3), ground floor commercial/retail/cafe (Use Class E), and public house (Sui Generis), boathouse locker storage and floating pontoon and floating ecosystems with associated landscaping, reprovision of Diamond Jubilee Gardens and other relevant works.'



Figure 4. Proposed site masterplan

5.3 The Proposed Development is largely comprised of two buildings; the Water Lane building and the Wharf Lane building.

5.4 The Water Lane building is located at the eastern end of the site, adjacent to Water Lane. The building presents an L-shaped mass where the long element runs the length of Water Lane before returning around the existing service road to the south. The building rises to four storeys with the fourth storey set within a continuous long pitched roof. The building presents a single frontage to King Street at the junction with Water Lane and Church Street and presents a double frontage to the gardens and the river.

- 5.5 Retail uses are proposed at the ground floor of the Water Lane building. The space is divided into six retail units; one accessed directly from King Street and four equally sized units with separate access from Water Lane. A small retail kiosk terminates the run of retail units on Water Lane. A café spans the width of the river facing double frontage and is accessed directly from the gardens.
- 5.6 Ground floor access into the residential units is provided at King Street and at Water Lane between the kiosk and café. A total of 21 affordable homes are provided in the Water Lane building.
- 5.7 The Water Lane building has been carefully designed to reflect the King Street character and appearance by incorporating a red brick façade across the ground-to-first floor levels, which provides a direct design response to the neighbouring buildings at the junction with Church Street.
- 5.8 To avoid the building appearing as one singular, bulky mass, the balconies have been grouped together in pairs to help modulate the façade.
- 5.9 Level 2 and the roof level comprises zinc sheet cladding which introduces a more contemporary design element to the building, building on the red-brick façade of the lower levels.



Figure 5. King Street elevation of the Water Lane building



Figure 6. Water Lane building south elevation



Figure 7. Water Lane building east elevation

- 5.10 The Wharf Lane building is located at the western end of the site, adjacent to Wharf Lane. The building presents an oblong form and is situated more southerly on site than the Water Lane building. The building presents a tri-part mass rising to five storeys on the western edge and four storeys on the inside eastern edge. To the south-east, the proposed public house/restaurant is set within a single storey. In keeping with Water Lane, the Wharf Lane building proposes pitched roofs.
- 5.11 Commercial uses are provided at ground floor in the Wharf Lane building. A flexible office space is provided to the north and a public house/restaurant together with the ancillary kitchens and publicly accessible toilets to the south and west. The office is accessed from the north, with a secondary access from Wharf Lane. The public house/restaurant is provided with entrances from the gardens at the east and the river frontage to the south. The kitchen has an entrance/exit from the Wharf Lane side of the building. A refuse store is provided at ground floor, accessed from Wharf Lane. Entrances to the residential cores are provided along the Wharf Lane frontage.
- 5.12 The Wharf Lane building includes an area of basement with bike storage and plant.
- 5.13 A total of 24 private tenure apartments and duplexes are provided in the Wharf Lane building over the first, second, third and fourth floors
- 5.14 The Wharf Lane building comprises pre-cast concrete cladding to frame the ground floor, with a light buff-brick façade across the residential floors. The use of zinc sheet panels on the roof unites the three elements.



Figure 8. River facing frontage of the Wharf Lane building

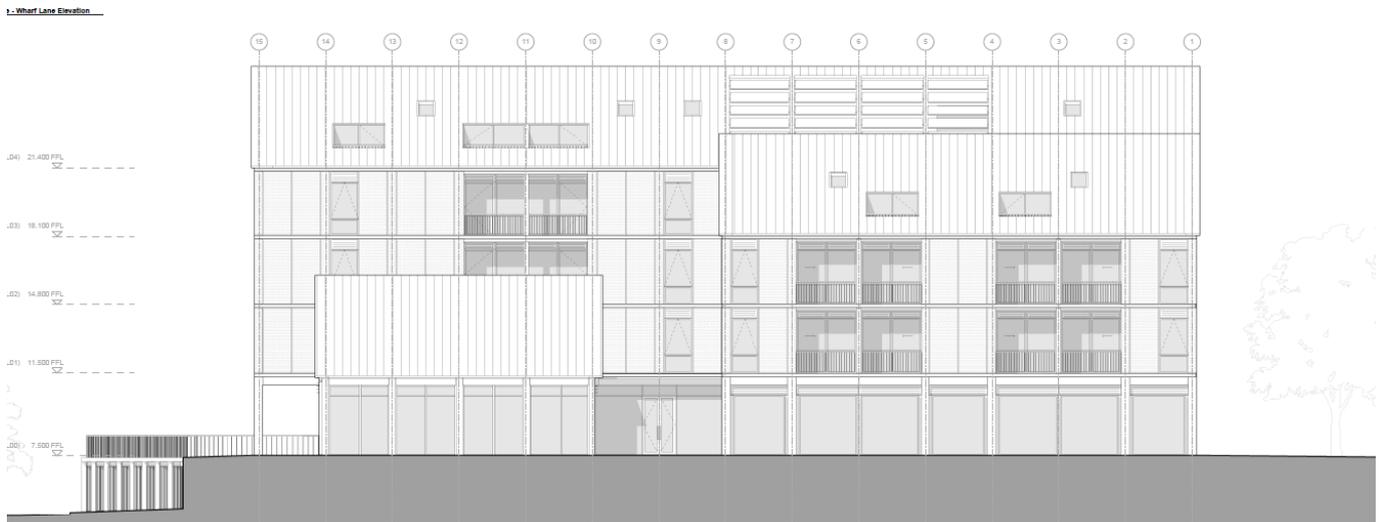


Figure 9. Wharf Lane Building east elevation



Figure 10. Wharf Lane Building west elevation



Figure 11. Proposed landscape masterplan

- 5.15 The application proposes the restoration of the Diamond Jubilee Gardens to provide, new public realm along the Embankment and streetscape improvements to Water Lane and Wharf Lane. Proposals for the gardens have been developed in conjunction with the Twickenham Riverside Trust. A petanque court and dedicated children’s play space is provided in the centre of the gardens with a terraced lawn to the south of the Water Lane building. Tree planting is proposed along Water Lane, to the immediate south of the service road, along Wharf Lane and along the river promenade. New areas of seating in the form of benches and seating terraces are provided. The application also proposes the relocation of the existing Black Poplar tree planted to the centre of the open space.
- 5.16 A boat store is provided within a void in the flood wall beneath the Wharf Lane building to the rear of dedicated river activity area on the Embankment. The application proposes a new floating pontoon attached to the river wall together with aquatic ecology baskets attached to the length of the river wall.
- 5.17 The Proposed Development includes works to re-provide a new flood defence wall to provide protection equal to or greater than the TE2100 defence level of 6.90m.
- 5.18 The following sections describe various elements of the Proposed Development in relation to scale, layout, residential use, transport, design and appearance.
- 5.19 A comprehensive design analysis of the Proposed Development is set out in the accompanying Design and Access Statement (‘DAS’).

Land use

- 5.20 The predominant land use is residential. The Proposed Development provides 45 new homes, including 21 new affordable homes to help meet local demand. More than 20% of the proposed floorspace is non-residential floorspace comprised of office, retail, café and pub use, community use in the form of the boat store in addition to ancillary space to accommodate plant space.
- 5.21 Table 3 below illustrates the proposed non-residential uses which will be delivered across the ground floor of the Proposed Development.
- 5.22 Table 4 below shows the number of new homes to be delivered per floor of both the Water Lane and Wharf Lane buildings. All of the proposed homes will achieve or exceed minimum residential space standards and all layouts are noted in the DAS and proposed drawings.

Table 3. Proposed Non-Residential Uses

Retail (sqm)	Office (sqm)	Café (sqm)	Pub (sqm)
368	320	255	444

Table 4. Apartments in Water Lane and Wharf Lane buildings

Building	1 st Floor	2 nd Floor	3 rd Floor	4 th Floor
Water Lane	11	10 (incl. 9 duplexes)	N/A	N/A
Wharf Lane	9	10 (incl. 5 duplexes)	3	2

- 5.23 The Proposed Development will provide a mixture of housing types and tenures to meet Richmond’s housing need by delivering a range of studio to 3-bed homes, as well as wheelchair accessible housing.

5.24 Table 4 illustrates the proposed housing and tenure mix, while Table 5 shows the proposed housing and size mix of the Proposed Development.

Table 5. Unit and Tenure Mix of Proposed Development

Tenure	No. of Habitable Rooms	%	No. of Apartments	%
Affordable Housing (Low-Cost Rented Housing and Intermediate)	53	50	21	47
Private	53	50	24	53
Total	106	100	45	100

Table 6 Unit Size and Mix of Proposed Development

Affordable Housing Tenure Breakdown					
	Studio	1-bed	2-bed	3-bed	Total
London Affordable Rent	0	9	7	2	17
London Shared Ownership	0	2	2	0	4
Total	0	11	9	2	21
Private Housing Tenure Breakdown					
	Studio	1-bed	2-bed	3-bed	Total
Total	5	9	10	0	24

Affordable Housing

5.25 As illustrated in Table 5 above, the Proposed Development will deliver 50% affordable housing by habitable room. This equates to 53 habitable rooms and 21 homes. Of these 53 habitable rooms, 43 are for London Affordable Rented housing and 10 habitable rooms are in London Shared Ownership tenure.

5.26 The affordable housing provision will consist of 81% Affordable Rented housing and 19% London Shared Ownership housing.

5.27 The affordable homes are provided in the Water Lane building and private homes in the Wharf Lane building.

5.28 Please see the submitted Affordable Housing Statement for further information on affordable housing.

Wheelchair Accessible Housing

5.29 A total of 5 homes (10%) of the Proposed Development will be wheelchair accessible/adaptable homes in line with the relevant Building Regulations standards.

Scale

5.30 The Water Lane building comprises a 4-storey building (23.15m AOD) and the Wharf Lane building comprises a part 5, part 4, part 1 storey building (26.34m AOD). The proposed public house/restaurant is a single-storey structure. The Proposed Development will provide the quantum of development outlined in Table 7 below.

Table 7. Proposed Development Areas

Overall Floorspace (sqm)	Residential Floorspace (sqm)	Commercial / Non-Residential Floorspace (sqm)	Children's Playspace (sqm)	Public Open Space (sqm)
6,592 (GIA)	3,021 (GIA)	1,387 (GIA)	343 (GEA)	6,984 (GEA)

- 5.31 The Proposed Development will provide 6,984 sqm of public open space. The focal point of the public open space will be centred around improved reprovided Diamond Jubilee Gardens, with two further distinct spaces: the Town Square and the River Promenade.
- 5.32 The Proposed Development provides 346 sqm of children's play space located within the Diamond Jubilee Gardens.
- 5.33 The non-residential uses of the Proposed Development are illustrated in Table 7, and the locations of these uses are shown in Figure 4. There is a total of 1,387 sqm (GIA) of non-commercial floorspace.

Access

- 5.34 The Site can be accessed by pedestrians through three principle routes: from Water Lane, from Wharf Lane and from the embankment, as illustrated in the figure below. The pedestrian route along the embankment will be improved to allow for pedestrian-only access.



Figure 12. Proposed Pedestrian Access Routes

- 5.35 The embankment and Wharf Lane's existing advisory cycle route will remain the primary cycle access to the Site.
- 5.36 Servicing access to the Site is from Wharf Lane, where a turning head will allow vehicles to egress back out to King Street or along the embankment from Wharf Lane. Existing servicing of Eel Pie Island is largely from Water Lane.

- 5.37 Refuse collection is proposed to take place from two loading bays located along the service road and Wharf Lane. The embankment will be used as the access point for the LBTH's 10.8m long refuse vehicle fleet to the Site. The refuse collection procedure requires the gates to the west of the proposed café to be open to allow for turning manoeuvring.
- 5.38 The Proposed Development is car-free except for the re-provision existing parking spaces. Six loading bays along the Embankment are to be retained for access and servicing of Eel Pie Island. Two parking bays are provided on Wharf Lane for use by Eel Pie Island tradespeople and visitors and three general Blue Badge space (one Wharf Lane and two on Water Lane).
- 5.39 The Proposed Development will deliver 32no. short stay cycle parking spaces and 85no. long-stay cycle parking spaces.

Energy and Sustainability

- 5.40 LBRuT Local Plan Policy LP22 (Sustainable Design and Construction) states that new major residential developments should achieve zero carbon standards in line with London Plan policy. The policy continues that non-residential buildings should achieve a 35% reduction against Part L of the 2013 Building Regulations.
- 5.41 The Proposed Development has a thermally efficient envelope and highly efficient building systems. This allows the residential element of the Proposed Development to achieve an on-site reduction in carbon emissions of 64%, and the commercial/non-residential element to achieve a 45% reduction when compared against the Part L 2013 Building Regulations. The combined reduction in on-site carbon emissions against the Part L 2013 Building Regulations is therefore 54%.
- 5.42 LBRuT Local Plan Policy LP22 (3) requires new non-residential buildings over 100sqm to meet the BREEAM 'Excellent' standard. The proposed public house/restaurant is 444 sqm (GIA) and is therefore required to meet this BREEAM 'Excellent' standard. The proposed retail/office spaces are also required to meet this standard since these spaces are also above 100 sqm. A BREEAM tracker was prepared by Method Consulting LLP which concludes that all proposed non-residential uses will achieve the 'Excellent' standard.
- 5.43 London Plan Policy SI 7 (Reducing Waste and Supporting the Circular Economy) encourages waste minimisation and increase waste and material reuse. The Proposed Development seeks to minimise waste as far as possible through the design process to enable as much materials to be recycled as possible. A detailed scheme of recycling and/or waste disposal will be developed following the appointment of the relevant contractor.

6. Planning Policy Framework

6.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

6.2 The Development Plan applicable to the Proposed Development is as follows:

- *The London Plan (2021);*
- *The London Borough of Richmond upon Thames Local Plan (2018) and (2020); and*
- *Twickenham Area Action Plan (2013).*

6.3 The Site lies within the Twickenham Area Action Plan ('TAAP'). Adopted in 2013, this sets out a vision for Twickenham to be a high-quality town centre, which is a destination of choice with a sense of place. It acknowledges that the future use and appearance of the riverside is vital to the success of Twickenham as a destination.

6.4 There are a number of adopted guidance documents which constitute material considerations in the determination of the Proposed Development. The most relevant guidance documents in this instance are:

- *The National Planning Policy Framework (2021);*
- *Planning Practice Guidance;*
- *Air Quality SPD (2020);*
- *Affordable Housing SPD (2014);*
- *Buildings of Townscape Merit SPD (2015);*
- *Design Quality SPD (2006);*
- *Planning Obligations SPD (2020);*
- *Refuse and Recycling Storage Requirements SPD (2015);*
- *Residential Development Standards SPD (2010);*
- *Shopfronts SPD (2010);*
- *Transport SPD (2010);*
- *Listed Buildings SPG (published in 1978, updated in 2005); and*
- *Conservation Areas SPG (2002).*

6.5 As set out in the Adopted Policies Map (2015), London Plan and adopted guidance, the following site designations are the most pertinent:

- *Twickenham Riverside Conservation Area;*
- *Twickenham Town Centre;*
- *Key Shopping Frontage;*
- *Thames Policy Area;*
- *Article 4 Direction Area (removing permitted development rights from B1a/E to C3);*
- *Flood Zones 2 and 3 (though the site has a flood defence running through it);*
- *Critical Drainage Area;*
- *Area Susceptible to ground-water flooding;*
- *Risk of surface-water flooding;*
- *Throughflow catchment area;*

- *Metropolitan Open Land; and*
- *Within Richmond Air Quality Management Area.*

6.6 LBRuT is currently reviewing its Local Plan. The emerging Local Plan will establish policies and guidance to shape LBRuT's places, plan and manage growth and guide development across the borough over a 15-year period. The Regulation 18 consultation is scheduled to begin in autumn 2021, with adoption scheduled for summer 2024.

7. Planning Considerations

7.1 This section assesses the Proposed Development against the Development Plan, having regard to the material considerations including the specific circumstances of the Site. Consideration is given to the planning matters arising from the Proposed Development, including:

- Principle of Development;
- Residential Use and Amenity;
- Design Matters
- Flooding
- Public Open Space
- Transport Matters;
- Sustainability and Energy Matters; and
- Other Environmental Considerations.

Principle of Development

7.2 The Site lies within the TW 7 Twickenham Riverside Proposal Site within the Twickenham Area Action Plan ('TAAP') (2013) which "aims to bring this derelict site back into active use, taking advantage of its riverside location and improving links between this area and the core of the town. The TAAP aims to retain some of the site as green space and identifies the re-use of the site as being key to the regeneration of the town centre.

7.3 The TAAP identifies a number of key objectives for the site which the Proposed Development delivers against:

- **maintain the existing ground floor retail frontages and residential uses above on King Street and provide new specialist retail, leisure and community uses**
The Proposed Development maintains active retail frontages at the sites junction with King Street. A new retail and café frontage is provided along the length of Water Lane in addition to a new pub/restaurant on the ground floor of the Wharf Lane building. A new petanque court, improved garden space, provision of river activities including a floating pontoon and a new open air event space meet the TAAP requirements for specialist leisure and community uses.
- **to link the existing service road to Water Lane**
Efforts were made during the iterative design process to link the service road to Water Lane. However, in order to maintain adequate flood defences and storage and address challenging site levels while providing adequate height clearances and turning heads, the scheme proposes a solid edge along Water Lane with no opening into the service road. Access to the service road is maintained from Wharf Lane.
- **create new open space to provide for a wide range of open uses, including on the former pool site and in the form of civic space beside Water Lane**
The Proposed Development includes public realm improvements to the Embankment where a new town square with amphitheatre-style terraced seating will become a new flexible, civic space for the town centre suitable for a range of uses and pop-up events. The Diamond Jubilee Gardens will provide space for games, play and rest and relaxation. The Proposed Development provides 343sqm of children's play against an existing provision of 187sqm and results in a net uplift in open space of 2,618sqm.

- **to maintain the Embankment as a working quay and, subject to feasibility, provide mooring and landing facilities**

The Proposed Development preserves the functionality of the quay through the provision of a new boat store and a floating pontoon. Detailed design of the floating ecosystems will ensure that mooring opportunities are safeguarded.

- **to improve the environment of the Embankment including reduction in car parking**

A total of 85 on street car parking spaces are to be removed as part of the borough's CPZ review. The Proposed Development retains six spaces on the Embankment for servicing of Eel Pie Island.

- **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**

The Proposed Development seeks to improve the streetscape in Water Lane and Wharf Lane through new hard surfacing and planting to unite the public realm and facilitate a more attractive desire line between the town centre and the riverside. The existing car park in Water Lane is to be replaced by the Water Lane building which includes residential uses on the upper floors and town centre uses on the lower floors.

- **to achieve high quality traditional design and/or reuse of buildings;**

The Water Lane and Wharf Lane buildings have been designed to respond to different townscape contexts with the Water Lane building mediating between the town and the river and the Wharf Lane building directly addressing its riverbank setting. The scheme proposes high quality architecture where use of brick draws on materiality in the surrounding context. Further detail is set out in the Design and Access Statement and Heritage, Townscape and Visual Impact Assessment.

- **to conserve and enhance the Twickenham Riverside Conservation Area and its setting and the setting of the Queens Road Conservation Area**

The Proposed Development is considered to contribute positively to the Twickenham Riverside Conservation Area, Queens Road Conservation and neighbouring heritage assets including listed buildings/structures and Buildings on Townscape Merit. Further detail is set out in the Planning Statement and Heritage, Townscape and Visual Impact Assessment.

- **all new uses to take account of the unique riverside setting**

The Proposed Development seeks to optimise the site's riverside setting. The site has been master-planned to ensure that physical and visual connections to the riverside are maximised. Leisure provision in the form of the boat store and the floating pontoon will encourage increased usage of the riverside for water sports and recreation. Buildings and windows have been oriented to maximise views across the river.

7.4 The Proposed Development is to considered to meet the aims and objectives of the TAAP for the renewal and re-use of this key town centre site.

7.5 The Proposed Development also seeks to optimise a well-connected brownfield site which is consistent with the London Plan (policy D3) which seeks to ensure that development makes the best use of land by following a design-led approach to optimise site capacity. The renewal of this town centre site also aligns with the Local Plan Strategic Vision which identifies that Richmond's main centres will have to accommodate the majority of higher density and larger scale development to enable people to walk to shops and services or use public transport.

Principle of Residential Use

- 7.6 There is a strategic need for increased housing delivery particularly on brownfield land sites. The National Planning Policy Framework ('NPPF') at paragraph 60 reiterates central Government's objective to significantly boost housing supply to ensure that a sufficient amount of homes is being delivered without unnecessary delay.
- 7.7 NPPF Paragraph 119 states that planning decisions should promote the effective use of land in meeting housing need and other uses in a way which makes an effective use of previously developed or brownfield land.
- 7.8 NPPF Paragraph 120 (c) states that '*Planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs...*'
- 7.9 NPPF Paragraph 120 (d) states that '*Planning policies and decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified need for housing where land supply is constrained and available sites could be used more effectively...*'
- 7.10 The general thrust of the NPPF clearly demonstrates the Government's support and encouragement for utilising brownfield land where such land can reasonable accommodate more homes. The Proposed Development is seeking to introduce residential use at the Site through 45 new homes on this town centre, highly accessible, brownfield site. This demonstrates alignment with the national objectives to boost housing delivery. Further, the acute need for greater housing delivery is outlined in the *Planning for the Future White Paper* (the White Paper), which highlights approximately 241,000 new homes were delivered nationally in 2018/19. Such delivery figures fall short of the Government's targets for 300,000 new homes per year.
- 7.11 London Plan Policy GG2 (Making the Best Use of Land) encourages the *development of land on brownfield land...prioritise sites which are well-connected by existing or planned public transport [and] proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in those locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.*
- 7.12 LBRuT Local Plan Policy LP34 (New Housing) outlines the Borough's housing target of 3,150 new homes for the 2015-2025 period, continuing that this target will be rolled forward until it is revised by London Plan target. Part (B) of the policy indicates that Twickenham can accommodate approximately 1000-1050 new homes.
- 7.13 The London Plan (2021) identifies a 10-year minimum housing supply target of 4,110 to be delivered in LBRuT between 2019/2020-2028/29, which equates to an annual housing requirement of 411. LBRuT's London Plan target in addition to its "rolled-forward" targets (as per LBRuT Policy LP34) equates to a housing supply target of 726 between 2015-2025. Paragraph 9.3.1 of the Local Plan states that between the 2014-2033 period there is a net deficit of 964 affordable homes per annum as identified in the Strategic Housing Market Assessment ('SHMA') (2016). It should be noted that the SHMA is due to be updated as part of the Local Plan review and a draft SHMA (2021) is expected to be issued later this year.
- 7.14 By virtue of the delivery of 45 new homes, the Proposed Development therefore aligns with policy and is acceptable in principle.

Principle of Non-Residential Floorspace

- 7.15 LBRuT Policy LP25 (Development in Centres) supports development in the Borough's town centres where it is in keeping with the centre's role and function and is of an appropriate scale. At part 2, the policy states that retail uses should be located within, adjacent to or well-related (or capable of being made so) to designated shopping frontages. The Proposed Development is located within the Twickenham Town Centre which is appropriate for retail uses (Use Class E) at the ground floor. Further, where new retail uses are proposed at the base of the Water Lane building, these adjoin the existing key shopping frontage on King Street in accordance with part 2 of the policy.
- 7.16 The Proposed Development will deliver a total of 943 sqm of commercial/retail floorspace (Use Class E) and a 444 sqm public house/restaurant (*Sui Generis*) at the ground floor.
- 7.17 LBRuT Policy LP26 (Retail Frontages) prohibits the loss of retail uses in Key Shopping Frontages. The Proposed Development results in the minor loss of approximately 20 sqm of retail space which is considered to be an immaterial loss in the context of an overall enhancement to the retail frontage along Water Lane which will contribute to an overall revitalisation of the high street and overall offer within the town centre. Paragraph 7.2.8 of the LBRuT Local Plan states that this retail policy primarily protects ground floor of retail premises, of which there is 708 sqm of existing ground floor retail space at the Site.
- 7.18 Parts (D)-(F) of TW 7 Proposal Site guidance in the TAAP encourages the redevelopment of the Site to deliver active frontages, active frontages at Water Lane which could include leisure or café uses. The Proposed Development delivers against this aspiration by providing retail frontages and a café at the ground floor of the Water Lane in addition to active uses at the base of Wharf Lane and activation along the Embankment by virtue of the boat storage and setting down and the floating pontoon.
- 7.19 Public realm improvements to the Embankment together with a new boat store and floating pontoon to promote river-based leisure aligns with the objectives of policy LP18 (River Corridors) which states that developments alongside and adjacent to the River Thames should ensure that they establish a relationship with the river, maximise the benefits of its setting in terms of views and vistas, an incorporate uses that enable local communities and the public to enjoy the riverside, especially at ground level in buildings fronting the river.
- 7.20 In terms of the provision of a new public house/restaurant, it is noted that in the context of policies that resist the loss of public houses, the supporting text to policy LP 27 notes that public houses play an important role and social function in the local community and they add to the local character of an area (paragraph 7.3.4).
- 7.21 The existing site includes 245 sqm of office uses. The Proposed Development includes 320 sqm of office floorspace in the ground floor of the Wharf Lane building. This represents an uplift of 75 sqm of office floorspace which aligns with policy LP 41 (Offices) of the LBRuT Local Plan which has a presumption in favour of the retention of offices and also supports new office development in the borough's five main centres. In accordance with the policy, the office space has been designed to accommodate flexible occupation and modern methods of working such as co-working and will also be able to meet the needs of local firms and SMEs in need of smaller working spaces.
- 7.22 The principle of ground floor non-residential commercial uses in this town centre location is therefore consistent with policies LP 25, LP 26, LP 27 and LP 41 of the LBRuT Local Plan and Proposal Site TW 7 in the TAAP. The provision of commercial uses at the ground floor also promotes place-making and provides animation to this part of the town centre, and extends the character of the shopping area down toward the River Thames.

Residential Mix, Tenure, Design and Amenity

Residential mix

- 7.23 The Proposed Development seeks to provide 45 new market and affordable homes in accordance with the unit mix set out in Table 4 and Table 5.
- 7.24 LBRuT Policy LP35 (Housing Mix and Standards) requires family-sized accommodation to be provided in development proposals, except within the five main centres where a higher proportion of small units would be appropriate. The Site lies within Twickenham Town Centre, of the Boroughs five main centres, and the higher proportion of smaller homes within the Proposed Development therefore aligns with policy.

Affordable housing

- 7.25 Policy LP36 (Affordable Housing) states that the affordable housing mix should reflect the need for larger rented family units. The Proposed Development provides larger 2b3p, 2b4p and 3b4p units in the affordable tenure to optimise the delivery of affordable family sized homes.
- 7.26 LBRuT Policy LP36 requires development proposals of 10+ homes to deliver 50% on-site affordable housing. The Council expects that 50% of all housing units will be affordable housing and that the 50% will comprise a tenure mix of 40% of affordable housing for rent and 10% of the affordable housing for intermediate housing.
- 7.27 As illustrated in Table 4 and Table 5, the Proposed Development provides 50% affordable housing (by habitable room) which meets the policy threshold. The supporting text to policy LP36 describes the need for affordable housing in Richmond as substantial and in this context a policy compliant provision in the Proposed Development ought to attract significant weight in the planning balance. Given the significant investment required to support the regeneration of the river frontage and the costs incurred by the Council, including land assembly, the delivery of a 50% affordable housing can only be secured with the support of GLA and council affordable housing grant. If grants are not available the Applicant would need to revisit the viability of the scheme given the funding gap that would be identified.

Table 8. Proposed Affordable Housing Tenure Breakdown

Tenure	No. of Habitable Rooms	%	No. of Apartments	%
Low-Cost Rented Housing	53	50	21	81
Intermediate Housing	53	50	24	19
Total	106	100	45	100

- 7.28 As illustrated in Table 8, the proposed affordable housing comprises of an 81:19 split in favour of Affordable Rented homes. This mix seeks to meet an identified housing need in LBRuT and reduce the number of residents on the Council's housing list and accords with the Council's preferred tenure split.
- 7.29 LBRuT Policy LP36 (Affordable Housing) requires evidence of meaningful discussions with a Registered Provider ('RP') where on-site affordable housing is required.

7.30 Prior to selecting an RP, the Applicant has conducted a soft market test and engaged with RPs including Richmond Housing Partnership, Paragon Housing, Shepherds Bush Housing Association, Richmond Charities, Octavia Housing, L&Q Group, A2 Dominion, Clarion Housing Association, Guinness Trust, Metropolitan Thames Valley Housing and Peabody. Feedback raised during this engagement included, but was not limited to:

- Generally favourable of the design of the Proposed Development's
- Positive feedback regarding the Diamond Jubilee Gardens
- Favourable to the energy strategy and use of ASHP
- Some concern around the use of Cross-Laminated Timber ('CLT') due to fireproofing; and
- Concerns over duplexes creating accessibility issues for older residents.

Residential quality

7.31 A total of 10% (5 homes) will be wheelchair accessible/adaptable in line with the relevant Building Regulations standards meaning that the Proposed Development is in accordance with LBRuT Policy LP35 Part (E). This policy states that 10% of new housing should meet the Building Regulation M4(3) requirement. The policy continues that 90% of new housing should meet Building Regulation standard M4(2) standard, which the Proposed Development also adheres to. Further detail is set out in the Design and Access ('DAS').

7.32 Each new home will provide private external amenity space in the form of recessed or Juliette balconies. LBRuT Policy LP8 (Amenity and Living Conditions) requires balconies to not raise unacceptable overlooking or noise disturbance to nearby occupiers. The Proposed Development has been designed to enhance residential amenity and minimise overlooking. These private amenity spaces are also compliant with Standards 26-27 of the London Housing SPG (2016).

7.33 Each new home will meet the Nationally Described Space Standards. All of the units will also meet the minimum floor-to-ceiling height specification outlined in Standard 31 of the London Housing SPG (2016). Further detail is set out in the DAS.

7.34 Standard 29 of the London Housing SPG (2016) states that development proposals should minimise the number of single aspect dwellings. The Standard continues that single aspects that are north facing or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain 3+ bedrooms should be avoided. London Plan Policy D6 (Housing Quality and Standards) requires housing development to maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. The policy continues that a single aspect dwelling should only be provided where it is considered a more appropriate design solution than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and overheating.

7.35 A total of 64% of the proposed dwellings benefit from dual aspect. Where dwellings are provided with a single aspect this is considered to be offset by the provision of private external amenity and the overall quality of the accommodation, sufficient ventilation and appropriate levels of daylight and sunlight. Single aspect units are limited to studios and 1bed flats and none are north facing. On balance therefore, it is considered that the level of outlook and aspect in the Proposed Development is appropriate for this town centre location which benefits from a setting within a public garden and close to the riverfront.

7.36 Standard 13 of the London Housing SPG requires each residential floor of a proposed development to contain a maximum of 8 apartments. The Proposed Development includes 2 cores and lift shafts in both the Water Lane and

the Wharf Lane buildings, both accommodating a maximum of 8 apartments serving each core. Further detail is set out in the DAS.

Summary

- 7.37 In summary, the Proposed Development seeks to provide 45 new homes, including new affordable homes, to optimise the capacity of this under-utilised, town centre, brownfield land site with excellent transport connectivity in line with national, regional and local planning policy and guidance. The Proposed Development, maximises the delivery of affordable housing and the introduction of residential uses at the Site aligns with LBRuT policy which directs a large proportion of new housing development toward Twickenham Town Centre.
- 7.38 In terms of residential quality and amenity standards such as private amenity space, internal space standards and floor to ceiling heights and aspect, the Proposed Development is consistent with regional and local planning policy and guidance. This ensures that prospective residents of the Proposed Development will enjoy an appropriate living environment.

Design Matters

- 7.39 This section considers design matters in greater detail. This section is set out under the following heads:
- Townscape and heritage
 - Landscape design
 - Children's Playspace;
 - Active Frontages; and
 - Other Environmental Factors.

Townscape and heritage

- 7.40 LBRuT Local Plan Policy LP1 (Local Character and Design Quality) states that the Council will require all development to be of high architectural and urban design quality. The policy sets out a range of criteria against which the Council will assess new development. A brief assessment of the Proposed Development against this criteria is set out below.

- **Compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing**

It is considered that the Water Lane and Wharf Lane buildings successfully address their respective townscape contexts. The Water Lane building mediates between the urban character of King Street and the riverine character of the Thames to the south. The Wharf Lane building is situated on the riverbank and is therefore more fundamentally part of the riverine character of the Thames. The design takes cues from river industry, particularly the boathouses and boatyards on Eel Pie Island.

On Water Lane, the proposed increase of height beyond that of the existing building at the north-east corner of the Site, and the introduction of the pitched roof form, responds to the established building scale, height and form along King Street. The building proposes a red brick façade to relate to the existing material palette in the town centre, particularly on Church Street.

The scale and height of the Wharf Lane building is considered appropriate in the context of the river and the Embankment; the building being articulated as three related volumes. The buff brick finish relates well to the riverine setting. The height of the building, the simple form of the roof and the façade treatment contribute to it sitting comfortably in views from the river.

The proposed landscape and public realm revitalises a derelict town centre and provides a variety of spaces for different uses and activities with planting designed to frame spaces within the gardens and provide a tree line along the river. Trees are spaced to allow for vistas to the river from the gardens.

Active ground floor uses, leisure and play provision in the gardens and water front activities help to animate the ground floor plane.

- **Sustainable design and construction, including adaptability, subject to aesthetic considerations layout, siting and access, including making best use of land**

The Proposed Development optimises the capacity of an under-utilised, well connected brownfield site. The site benefits from good connections to public transport and the residential development is “car-free”. The non-residential elements are targeted to achieve BREEAM “Excellent”. Further detail is set out in the DAS and the Sustainable Construction Checklist.

- **Space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features**

The masterplan places new buildings at the sites edges allowing the Diamond Jubilee Gardens to become the focal in a visual axis towards the River Thames. At four storeys, the height of the Water Lane building is commensurate with neighbouring buildings on King Street. The set back of the building from the Water Lane mitigates the increased height relative to buildings on the northern side of Water Lane. The height and scale of the Wharf Lane building is considered appropriate for the river facing south west corner of the site which will add architectural interest to the existing backland environment on Wharf Lane.

Overshadowing assessments of the proposed open spaces show that availability of sunlight will exceed BRE minimum standards.

- **Inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation**

The site is will be publically accessible at all times. Active ground floor uses during the day and in the evening will help ensure natural surveillance. Through improvements to the riverfront environment and Water Lane and Wharf Lane, the Proposed Development enhances connectivity with the town centre and delivers legible and accessible routes along desire lines between King Street and the river.

- **suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site**

The mix of residential, retail and commercial uses is appropriate for the town centre location.

7.41 Policy LP2 (Building Heights) requires new buildings to respect and strengthen the setting of the borough’s valued townscapes and landscapes through appropriate building heights that make a positive contribution to local character, townscape and generally reflecting prevailing building heights in the vicinity and preserving the borough’s heritage assets.

7.42 Policy LP3 (Designated Heritage Asset) states that the Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough.

Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. At part C, the policy states that all proposals in Conservation Areas are required to preserve and, where possible, enhance the character and appearance of the Conservation Area. Policy LP4 (Non-Designated Heritage Assets) seeks to preserve and where possible enhance the significant, character and setting of non-designated heritage assets including Buildings of Townscape Merit.

- 7.43 A detailed assessment of the effects of the Proposed Development is set out in the Heritage and Townscape Visual Impact Assessment. It concludes that the proposed development contributes positively to the Twickenham Riverside Conservation Area owing to the architectural and landscape enhancement of the site, which is prominently located adjacent to the River Thames and extends through to King Street.
- 7.44 The Site is situated within The Riverside sub-area of the Conservation Area, which is characterised by a mixed urban and semi-rural built environment. The Proposed Development would improve substantially upon the current low contribution the Site makes to the character of this area through its enhanced visual and architectural engagement with both the riverside to the south, and the town centre to the north.
- 7.45 On Water Lane, the proposed increase of height beyond that of the existing building at the north-east corner of the Site, and the introduction of the pitched roof form, responds to the established building scale, height and form along King Street. The Proposed Development is considered to contribute to the definition of the townscape by responding to both the scale of buildings along principal thoroughfares such as King Street and the scale of secondary, historic routes such as Church Street.
- 7.46 The Water Lane building has been conceived as a single piece connecting King Street to the riverside. The design has an inherent unity and avoids being broken up in to parts to respond to different townscape contexts. Like other existing buildings on or close to King Street such as the listed bank at No. 2 York Street, the Water Lane building is of its era, and brings a 21st Century architecture of high quality on to King Street where it takes its place amongst a group of conservation area buildings which are quite varied in terms of their architectural style, materials, and rooflines. In the context of King Street, therefore, as well as in relation to the riverside and Water Lane itself, the proposed Water Lane building would represent an enhancement to the character and appearance of the Twickenham Riverside Conservation Area.
- 7.47 Our analysis of the significance of the Twickenham Riverside and Queen's Road Conservation Areas and assessment of the effects of the Proposed Development demonstrate that the proposals will conserve and make a positive contribution to the historic environment in Twickenham Town Centre.
- 7.48 The Heritage and Townscape Visual Impact Assessment identifies listed buildings in the proximity to the Site and concludes that the Proposed Development will not affect their significance. These buildings include:
- Boathouse and deep-water dock, riverside landing stage, steps, balustrade and gates, Thames Eyot
 - 10 and 12 King Street
 - The George Public House 32 King Street, and 34 and 36 King Street
 - K6 Telephone kiosk Junction of King Street and Water Lane
 - No.2 The Embankment
- 7.49 The significance of the listed Bank, 2 York Street is derived from both its architectural value as a building of high quality design and its prominent townscape location within Twickenham's commercial centre. The Proposed Development involves the construction of a three-storey building at the corner junction of King Street and Water

Lane which responds to the established building height of the asset and others within the immediate setting of the Site, though with a new and innovative form. The Proposed Development would remove the current visual distraction of the Santander building from eastward views along King Street and replace them with an appropriately scaled new building. As a result, the role of the listed bank as a visual focal point in views on King Street would be enhanced. The Proposed Development is therefore considered to be a worthy companion to the asset in the streetscape.

7.50 In considering potential impacts of the Proposed Development on heritage assets, weight ought to be attributed to the public benefits of the Proposed Development which secure optimum viable use of the Riverside sub-area of the Twickenham Riverside Conservation Area. These public benefits include:

- The replacement of existing poor quality buildings which blight the setting of the Twickenham Riverside Conservation Area
- The widening and enhancement of the pedestrian route to the river on Water Lane
- The rejuvenation of the Diamond Jubilee Gardens and provision of new open space for a range of uses and activities in the heart of the town centre
- The delivery of new homes including 21 affordable homes in the Water Lane building
- The re-connection of the River Thames to the town centre

Landscape design

7.51 The Proposed Development will provide new public realm and public open space for residents and the wider community. The Proposed Development will deliver over 7,000 sqm of public open space in total across an enhanced Diamond Jubilee Gardens, Lawn Terraces, Town Square, River Promenade and River Gardens.

7.52 Part (A) of the TAAP TW 7 Proposal Site encourages open space, a mixture of hard and soft landscaping to allow for a variety of different uses such as leisure activities, a playground and café. LBRuT Policy LP31 (Public Open Space, Play Space, Sport and Recreation) protects and encourages the improvement/enhancement of such space where possible. London Plan Policy G4 (Open Space) states that development proposals should not result in a loss of protected open space and, where possible, create areas of publicly accessible open space particularly in areas of deficiency.

7.53 The NPPF at paragraph 99 states that existing open space, sports and recreational buildings and land should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or***
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*

7.54 The existing Diamond Jubilee Gardens function as public open space within the town centre. The Gardens are subject to a 125 year lease to the Twickenham Riverside Trust and consist of an area of 2,513sqm including a children's playground with five play apparatus including a sandpit, two areas of artificial grass, a large area of hardstanding for events, two petanque pitches, an existing Council owned café kiosk and soft landscaping and

trees. The Proposed Development provides 4,008sqm of public open space to be leased back to the Trust, an uplift of 1,495sqm. The re-provided Gardens are provided in the heart of the site and include a net uplift in the provision of place space, two petanque courts, three terraced lawns and seating and a rain garden. The overall uplift in open space is 2,618sqm. As a result, the Proposed Development is considered to satisfy the exceptions criteria in part b of paragraph 90 of the NPPF by providing replacement open space that is better in terms of quality and quantity within the same location. Further detail is set out in the submitted Landscape and Public Realm Report.

7.55 The Proposed Development will deliver new high quality public realm through the use of stone paving from the northern tip of Wharf Lane down to the River. The junction of Wharf Lane and the proposed service road will be slightly raised to create a shared service and accessible route to the Diamond Jubilee Gardens entrance. The proposed Water Lane building will be set back from the pavement in order to create a widened continuous public space extending across all of Water Lane. This enhances the public realm and provides a legible route into the Diamond Jubilee Gardens. These public realm enhancements bring about a significant public benefit by creating an attractive street-scene and pedestrian environment in alignment with the aims and objectives of the TAAP.

7.56 LBRuT Policy LP16 (Trees, Woodland and Landscape) requires the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new high quality green areas which deliver amenity and biodiversity benefits. To ensure development proposals protect, respect and contribute to trees and landscapes, the Council will consider the following criteria, which for ease has been provided in Table 9 below.

Table 9. Trees, Woodland and Landscape Policy Assessment

Trees and Woodland	
Policy Criterion	Assessment
Resist the loss of trees unless the tree is dead, dying or dangerous; or the tree is causing significant damage or has little to no amenity value. Resist development resulting in loss or deterioration of irreplaceable habitat such as ancient woodland.	There is no ancient woodland within the Site, but we note a minimal amount of trees are being removed – with a large proportion of the existing trees being replanted within the Proposed Development.
Resist development resulting in damage or loss of trees considered to be of townscape or amenity value. LBRuT requires site design/layout to have a harmonious relationship between trees and their surroundings. Development likely to result in pressure to significantly prune or remove trees will be resisted.	The Proposed Development will deliver a more comprehensive and joined-up approach to the Site’s landscape and tree context. Trees with high community and social value such as the Native Black Poplar, which was planted by Sir David Attenborough, will remain on-site and be a focal point in the improved Diamond Jubilee Gardens.
LBRuT will require, where practicable an appropriate replacement of felled trees; a financial contribution to the provision for an off-site tree in line with the trees CAVAT value.	A full CAVAT assessment has been provided to the LBRuT during pre-application. This assessment provided a detailed financial breakdown and justification of the trees to felled.
Require new trees to be of suitable species for the location in terms of height and root spread, having regard to the space trees need to mature. The use of native species is encouraged where appropriate.	Where new trees are proposed these will be selected based on the existing context of the Site and further soil investigations to ensure the species complements and enhances the existing tree context and will be viable in this location. See the submitted Landscape Report for further detail.
Trees to be adequately protected throughout the course of development in accordance with British Standard 5837.	All trees within the Proposed Development, whether new or a relocated existing tree, will be protected in line with BS 5837. See submitted Arboriculture Report for further detail.
Landscape	

Require the retention of important existing landscape features where practicable	The Proposed Development retains important existing landscape and trees within the Site such as the Native Black Poplar, which was planted by Sir David Attenborough and is a key tenet of the proposed landscape and public open space.
Require landscape design and materials to be of high quality material and compatible with the surrounding landscape and character	To be compatible with the existing surrounding landscape and character of the area, the same stone paving used in Church Lane will be used in the Proposed Development. This will run from the northern tip of Water Lane and continue down its entirety to create a single continuous landscape environment.
Encourage planting including new trees, shrubs and other significant vegetation where appropriate.	To enhance the existing Site landscape, the Proposed Development will plant 30 new trees which will be distributed across the Site as appropriate.

7.57 Table 9 above demonstrates the Proposed Development complies with LBRuT Policy LP16

Children's Play space

7.58 LBRuT Local Plan Policy LP31 (2) (Public Open Space, Play Space, Sport and Recreation) requires major developments of which 10 or more children will occupy, to provide the London Plan benchmark standard of 10 sqm of on-site play space provision per child.

7.59 According to the GLA's Population Yield Calculator, the Proposed Development is required to deliver 148.6 sqm of on-site children's play space to provide for the child yield from the new residential apartments. The requirement for the uplift is in addition to a requirement to replace the existing 187 sqm of play space. This creates a total play space requirement for the Proposed Development of 335.6 sqm.

7.60 The Proposed Development will provide 343 sqm of dedicated children's play space on-site, which equates to 7.4 sqm overprovision of children's play space.

7.61 The proposed play space is centrally located within the refurbished Diamond Jubilee Gardens and is bordered by a Hornbeam trees and planted buffer.



Figure 13. Dedicated children's play space

7.62 The proposed play space will deliver various play equipment including a tree house with slide, climbing net, seesaw, roundabout, digger and spinners. The dedicated play space is designed to meet the door-step play requirements of younger children between 0 and 11 years.

7.63 The gardens provide scope for informal play for older children 12 years and over. Notwithstanding, in accordance with policy LP31, an assessment of existing play facilities for children aged 12 years and over within 800 metres of the site has been undertaken.

7.64 This assessment demonstrates that there is sufficient provision within a short distance of the site to meet the needs of children aged 12 years and over who comprise a small proportion of the overall child yield. We have identified the following play spaces and facilities within 800m walking distance from the Site:

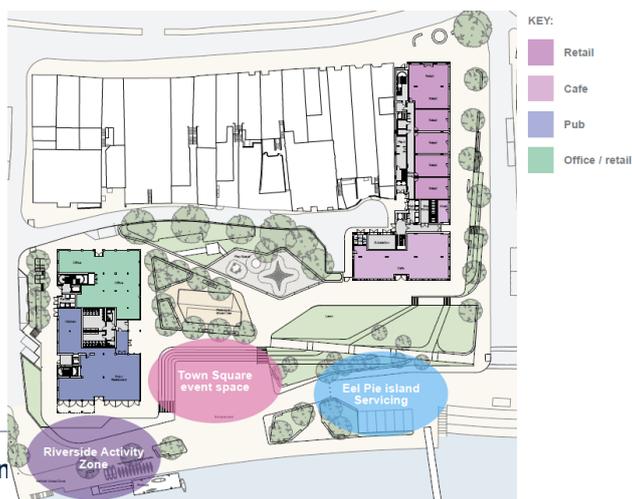
- Craneford way Playing Fields;
- Jeremy Hooton Tennis Coaching;
- Richmond Baseball Club;
- Riverside Drive Playground;
- Richmond & Kew Football;
- Sheen Parks Tennis – King George’s Field;
- Tennis Court adjacent to Moor Mead Road;
- Tennis courts, basketball courts and football pitch adjacent to Grotto Road; and
- Twickenham Lawn Tennis Club.

7.65 On balance therefore, the Proposed Development is considered compliant with both the LBRuT Local Plan and London Plan requirements for the provision of children’s play space.

Active Frontages

7.66 Part (E) of the TAAP TW 7 Proposal Site seeks redevelopment of the Site to include active frontages at ground floor level. London Plan Policy SD6 (Town Centres and High Streets) states that active street frontages should be secured in new development proposals, including where there are ground floor residential frontages.

7.67 The Proposed Development will deliver active frontages on the ground floor of each of the proposed buildings. At street level the Water Lane building provides retail and café space which seeks to provide a continuous retail/leisure experience extending from King Street and the key shopping frontage. The Wharf Lane building will provide office space which will activate that south-western section of the Site. The proposed pub/restaurant is single storey and therefore provides a wholly active ground floor which also extends outside the building through al-fresco dining with views out onto the River Thames.



- 7.68 **Figure 14. Riverside Activity Zone** lies such as kayaking. The storage comprises a series of pre-fabricated lockers in front of the flood defence wall. The lockers are set at a 45-degree angle and staggered in arrangement in order to accommodate different sizes of paddleboards and kayaks. There are nine lockers in total, each giving access to 4-5 racks with rollers to allow the boards to slid in/out of the lockers which maximises the overall amount of storage.
- 7.69 The boathouse lockers are designed to support the deck above in which the pub/restaurant's outdoor terrace. These lockers allow for a continual active frontage throughout the Site beginning from the northern tip at Water Lane and leading right to the southern edge along the River embankment.
- 7.70 In view of the active building frontages and the proposed Riverside Activity Zone, the Proposed Development is considered to comply with the LBRuT policy and London Plan policy regarding active frontages in new developments.

Flooding and drainage

- 7.71 The Site lies partially within Flood Zone 3b and Flood Zone 2. This means the Proposed Development is vulnerable to flooding from the River Thames but is an area benefitting from flood defences to mitigate against this risk. As the Site lies within Flood Zones 2 and 3b, a Flood Risk Assessment ('FRA') is required to accompany the planning application. An FRA has been prepared by Webb Yates.
- 7.72 The NPPF at paragraph 159 seeks to steer development away from areas at high risk of flooding. Paragraph 161 requires development plans to apply a sequential, risk-based approach to the location of development by applying the sequential test and then, if necessary, the exception test.
- 7.73 At paragraph 162, the NPPF states that where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again.
- 7.74 LBRuT Policy LP21 (Flood Risk and Sustainable Drainage) requires all development to avoid or minimise its contribution to all sources of flooding including fluvial, tidal or surface water among others, accounting for climate change and without increasing flood risk elsewhere. Development will be guided to areas of lower risk by applying the 'Sequential Test' as set out national policy guidance, and where necessary the 'Exception Test' will be applied.
- 7.75 Flood Zone 3b is identified in the Council's Strategic Flood Risk Assessment as the functional floodplain. The policy states that the floodplain will be protected by not permitting any form of development on undeveloped sites unless it is for Water Compatible development or essential utility infrastructure. Redevelopment of existing developed sites will only be supported if there is no intensification of the land use and a net flood risk reduction is proposed. In Flood Zone 2 and Flood Zone 1 there are no land use restrictions.
- 7.76 Table 3 in the Flood Risk and Coastal Change chapter of the PPG identifies that "More Vulnerable" uses such as housing and "Less Vulnerable" uses such as shops, offices and restaurants should not be permitted in Flood Zone 3b but are appropriate in Flood Zones 1 and 2.
- 7.77 The southern most parts of the existing site lie within Flood Zones 2 and 3.

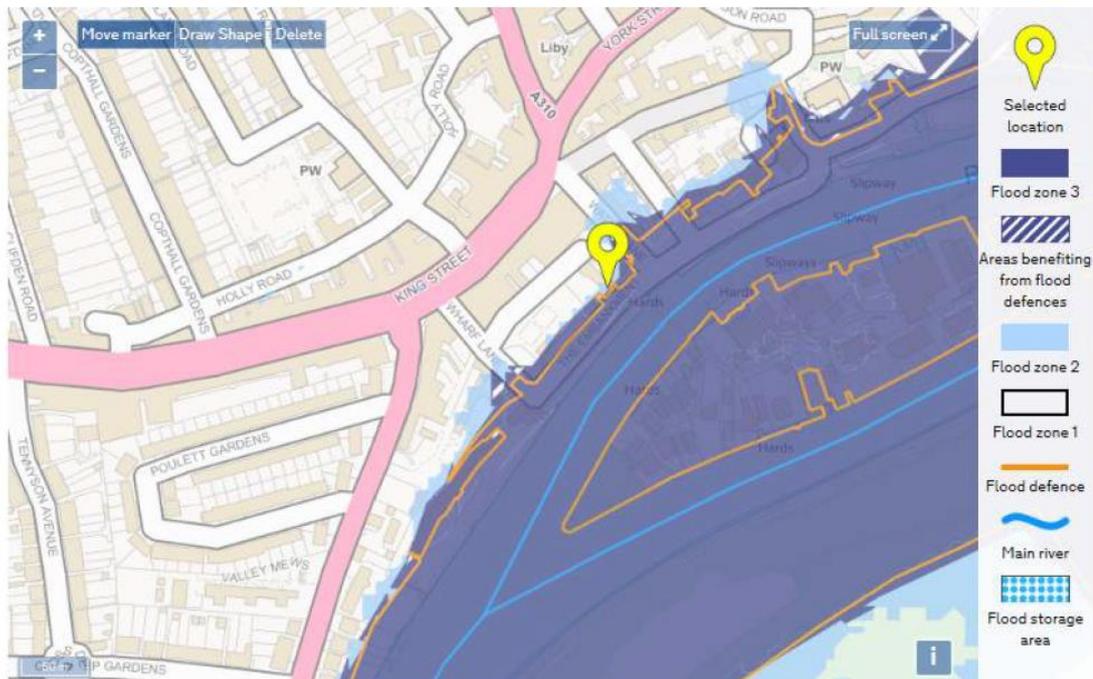


Figure 15. Flood Zone Map – existing site

7.78 Following detailed engagement with the Environment Agency, the Proposed Development has been designed to provide sufficient protection and set-backs from any flood wall and adequate flood water storage on site. The application proposes the realignment of the existing flood wall and buildings with “More Vulnerable” and “Less Vulnerable” uses set back 4 metres behind the wall.

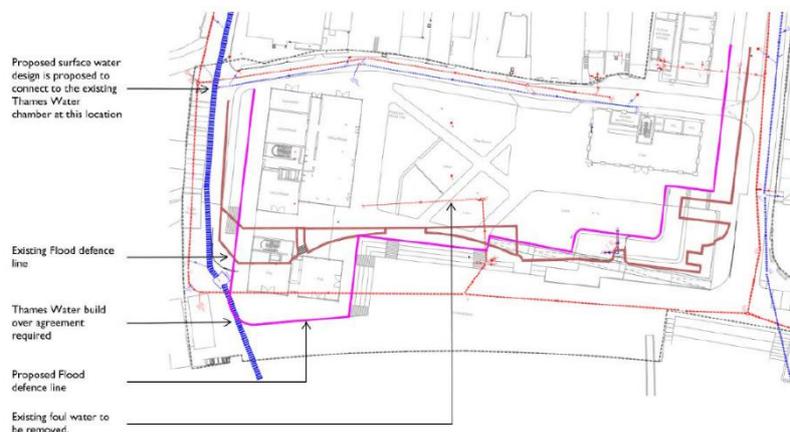


Figure 16. Realignment of the flood defence wall

7.79 The proposed flood defence wall has been designed to provide protection equal to or greater than the TE2100 defence level of 6.90m. The proposals and the re-alignment of the flood defence wall alter the topography of the site such that the elevation of the core part of the site where the “More Vulnerable” and “Less Vulnerable” uses are located fall within Flood Zone 1.

Table 10. Flood Zone Elevations

Flood Zone	Tidal flood level	Fluvial flood level	Critical flood level
Flood Zone 1	≥ 6.9m	≥ 6.98*m	≥ 6.98*m
Flood Zone 2	5.8m – 6.90m	5.69m – 6.94m	5.8m – 6.98*m
Flood Zone 3**	≥ 5.8m	≥ 5.69m	≥ 5.8m

*Conservatively estimated from existing EA Flood Zone extent map. Flood Zone 2 appears to extend higher on both Water Lane and Wharf Lane in the proposed Flood Zones. This is not due to change in road levels but due to the maximum level for Flood Zone 2 being conservative estimates.

**LBRuT SFRA classifies the Flood Zone 3 area of the site as Flood Zone 3b Functional Floodplain.

7.80 Policy LP21 at paragraph 6.2.2 requires the application of the Sequential Test for future development in Flood Zone 3a and 2. An exception would apply given the site is a Local Plan Proposal Site which has already been sequentially tested. Notwithstanding, by virtue of the proposed design which sets buildings and vulnerable uses 4 metres behind a 6.90m defence wall, there is no development within Zones 3 and 2 meaning that the Sequential Test is not required.

7.81 The submitted FRA includes a diagram which overlays the TAAP boundary over the red line planning application boundary to identify areas lying outside of the TAAP boundary and not therefore benefitting from strategic sequential testing. This diagram (Figure 17) shows a small area of the Wharf Lane building lying outside of the TAAP boundary as well as Wharf Lane, Water Lane and the Embankment which all form part of this planning application boundary. In these areas of streetscape which lay outside the TAAP boundary, there is compliance with Sequential Test as there is no intensification of development or the existing land use and no reduction in flood storage. Where a small part of the Wharf Lane building extends beyond the TAAP boundary, this is within Flood Zone, where development does not trigger the need for a Sequential Test.



Figure 17. Flood Zone and TAAP Overlay Diagram

7.82 The proposed boat store is located in Flood Zone 3b. As per the table in policy LP21 and Table 3 in the PPG, the boat store is a “Water Compatible” use. The design of the boat store has been subject to discussions with the Environment Agency to ensure access to the flood wall for essential maintenance and upgrading is safeguarded.



Figure 18. Flood Zone extents in the Proposed Development

- 7.83 The submitted Flood Risk Assessment includes detailed assessments demonstrating that the Proposed Development does not result in a reduction in flood storage volumes and does not reduce flood risk overall by increasing the volume of storage within Flood Zone 3b. This accords with the policy cascade in LP21 where it states that redevelopment of existing developed sites will only be supported if there is no intensification of the land use and a net flood risk reduction is proposed.
- 7.84 Policy LP21 requires all applications for major developments in Flood Zones 2 and 3 to be accompanied by a Flood Emergency Plan. A Flood Emergency Plan has been produced for the site in accordance with the LBRuT document: Guidance on Producing a Flood Emergency Plan – November 2011.
- 7.85 LBRuT Policy LP21 Part (C) requires the use of Sustainable Drainage Systems ('SuDS') in all development proposals.
- 7.86 A SuDS Report and London Drainage Proforma have been prepared by Webb Yates. The report outlines a number SuDs strategies for the Proposed Development including:
- Infiltration through increases in soft landscaped areas
 - 50% impervious paving/50% of water on paving lost to evaporation/infiltration
 - Scope for an infiltration tank
 - Rainwater attenuation tank
 - Discharge of rainwater into the river
 - Discharged of rainwater from the building into an existing surface water sewer
- 7.87 Policy LP21 requires development to demonstrate it: (a) reduces surfaces water discharge to greenfield run-off rates where feasible; and (b) where greenfield run-off rates are not feasible, it must be demonstrated the minimum

requirement is to achieve at least 50% attenuation of the Site's surface water run-off at peak times based on the levels existing prior to the Proposed Development.

7.88 Results of a Micro Drainage Assessment are set out in the FRA and SuDS report. This shows that the Proposed Development does not reduce the runoff rate into the existing surface water network to greenfield runoff rates. However, the runoff rate is reduced by more than 50% in accordance with LP21.

7.89 As the Proposed Development sites behind the flood defence wall, as noted in Paragraph 7.77 of this planning statement, there is no development within Flood Zones 3b or 2, meaning the Proposed Development is wholly within Flood Zone 1. LBRuT Local Plan Policy LP21 (Basements and Subterranean Development) does not restrict new basements or extensions to existing basements. Whilst the proposed basement is acceptable in principle since it is located within Flood Zone 1, it should be noted that a Basement Impact Assessment (BIA) was prepared by Webb Yates in support of the planning application. The BIA concludes the Proposed Development will not cut off prevailing groundwater flow that may currently pass through the permeable Kempton Park Gravels. It also notes the groundwater shows signs of flowing towards the River Thames. The proposed basement therefore complies with Policy LP21 part (B).

Public Open space

7.90 There is no designated Public Open Space on site and historic planning consents acknowledge that the existing Gardens are a temporary provision. Notwithstanding, the gardens currently function as public open space and design guidelines in the TAAP state that the gardens should be extended and enhanced with high quality landscaping, children's play space and performance/events space.

7.91 Policy LP31 (Public Open Space, Play Space, Sport and Recreation) states that Public Open Space, children's and young people's play facilities as well as formal and informal sports grounds and playing field will be protected, and where possible enhanced. The policy also states that improvement of existing facilities and spaces, including their openness and character and their accessibility and linkages, will be encouraged.

7.92 Paragraph 99 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

7.93 In recognition of the existing informal nature of the Gardens, an open space assessment in terms of part b of paragraph 97 of the NPPF is set out in the Landscape and Public Realm Statement.

7.94 This assessment demonstrates that the existing quantum of open space is 4,366 sqm and that the proposed quantum of open space is 6,984 sqm. This represents an uplift in open space of 2,618 sqm. The provision also improves in terms of quality of both hard and soft surfaces, planting, seating and play.

7.95 See the submitted Landscape and Public Realm Report prepared by LDA for greater detail.



 Existing Open Space

Figure 19. Existing open space



Figure 20. Proposed open space

7.96 A small portion of the site at the south of Water Lane at the slipway and the River Thames is designated Metropolitan Open Land. Local Plan policy LP13 (Green Belt, Metropolitan Open Land and Local Green Space) seeks to protect and retain the borough’s Green Belt and Metropolitan Open Land. The retention of the slipway, resurfacing of the Embankment and Water Lane, the provision of a floating pontoon and floating aquatic ecology baskets are considered development within the Green Belt or Metropolitan Land as set out in part A of the policy and paragraph 148 (b) of the NPPF:

“A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

7.97 The provision of floating ecosystems is also consistent with part A of policy LP13 which states that appropriate uses within Metropolitan Open Land includes biodiversity.

7.98 Part C of policy LP13 goes on to state that *“improvement and enhancement of the openness and character of the Green Belt or Metropolitan Open Land and measures to reduce visual impacts will be encouraged where appropriate.”*

7.99 By virtue of the contextual scale of the buildings and their generous set back from the river’s edge and the slipway, the Proposed Development is not considered to harm the character and openness of the MOL. The form of the

proposals have been assessed in the submitted HTVIA to fit well into the green setting of the river and respond positively to the hard edge of the Embankment.



Figure 21 Existing (l) and Proposed (r) views looking upstream from the riverside, close to York House Gardens

Transport

7.100 Paragraph 106 of the NPPF requires new developments to consider local transport capacity and promote sustainable transport choices. The London Plan promotes development that will not adversely affect safety on the transport network. The London Plan sets out the following:

- Policy T5 seeks secure cycle parking in line with the standards set out in Table 10.2 of the London Plan;
- Policy T2 seeks high quality pedestrian environments;
- Policy T6.4 states the maximum standards for car parking should be achieved and that 1 in 5 spaces should provide an electrical charging point.

7.101 LBRuT Local Plan Policy LP44 Part D (Sustainable Travel Choices) seeks to ensure new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway network arising from the development itself or the cumulative effects of development. In assessing this impact of development proposals on the transport network, planning applications should be supported by a Transport Assessment for major developments.

7.102 A Transport Assessment ('TA') has been prepared by WSP to accompany this planning application. The Site has a PTAL rating of 5 and 6 which indicates it has very good levels of transport accessibility based on walk access times and service availability. The Proposed Development will not be detrimental to the operation of the local highway and the proposed cycle parking will be in accordance to London Plan Policy T5.

Car Parking

7.103 London Plan Policy T6 (Car Parking) states that development proposals should adhere to the maximum standards established in the Plan London Plan Policy T6.1. Table 10.3 of the London Plan, targets car free development in areas of PTAL 5-6. At part G, the policy states that disabled person parking should be provided in major developments where for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset. This is subject to the appropriate amount of wheelchair accessible spaces being provided as set out in Policy T6.1.

7.104 Owing to site constraints, the proposals do not include provision for on-site residential disabled persons parking. On balance, given the availability of Blue Bay spaces on-street and the highly connected nature of this town centre site, the absence of dedicated on-site disabled persons parking is considered acceptable.

Cycle Parking

7.105 London Plan Policy T5 (Cycling) sets out the minimum cycle parking standards for residential development as illustrated in Figure 19.

Table 11. Minimum Cycle Parking Standards for Residential Use

Use Class	Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
C3-C4	<ul style="list-style-type: none"> 1 space per studio or 1 person 1 bedroom dwelling 1.5 spaces per 2 person 1 bedroom dwelling 2 spaces per all other dwellings 	<ul style="list-style-type: none"> 5 to 40 dwellings: 2 spaces Thereafter: 1 space per 40 dwellings

7.106 LBRuT Policy LP44 Part B (Sustainable Travel Choices) states proposal will be expected to support improvements to existing services and infrastructure where no capacity currently exists or is planned to be provided.

7.107 The Proposed Development will provide a total of 117 cycle parking spaces in line with Table 12. There will be a total of 85 long-stay cycle parking spaces and 32 short-stay cycle spaces across the Proposed Development

Table 12 Proposed Cycle Parking

Residential Cycle Parking Provision		
Long Stay	Short Stay	Total
75	3	78
Commercial Cycle Parking Provision		
10	29	39
		117

7.108 The long-stay cycle parking for residents is provided as per the London Cycle Design Standards ('LCDS'), with 20% of spaces being accessible Sheffield cycle-stands and 80% in the form of two-tier stands. Short-stay cycle parking will be provided within the public realm in the form of Sheffield stands.

Servicing and Refuse Management

7.109 London Plan Policy T7 (Deliveries, Servicing and Construction) relates to servicing and the requirement for Delivery and Servicing Management Plans to accompany development proposals, where necessary.

7.110 LBRuT Local Plan Policy LP45 (Parking Standards and Servicing) requires new major development which has servicing needs to demonstrate it creates no severe impact on the efficient and safe operation of the road network and no material harm to the living conditions of nearby residents. This should be demonstrated through a Delivery and Servicing Plan and Construction Logistics Plan.

- 7.111 A Delivery and Servicing Plan ('DSP') was prepared by WSP in support of the Proposed Development. The DSP notes that the Proposed Development is expected to generate 22 daily vehicle trips in regard to servicing trip generation.
- 7.112 The DSP also outlines that the Wharf Lane building will be serviced from a delivery bay along its eastern elevation, with the Water Lane building being served from the rear access along the service/delivery road. The service/delivery road features landscaping and a secure perimeter to ensure no general public access conflicts with those delivery and servicing vehicles from executing manoeuvres.
- 7.113 There will be a gate to the west of the proposed café that provides access to the Diamond Jubilee Gardens for servicing and maintenance. A gate is required to ensure the safety of the children's play area and meet the requirements of the Twickenham Riverside Trust. This will be opened to allow vehicles larger than 7.5-tonne box vans to reverse. Further, a small-medium delivery van (up to 7.5-tonne box van) is able to service the Proposed Development and manoeuvre (reverse) whilst the gate is closed.
- 7.114 LBRuT Local Plan Policy LP24 (Waste Management) requires all development to ensure the management of waste, including the location and design of refuse and recycling facilities, is sensitively integrated within the overall design of a scheme.
- 7.115 Refuse management within the Proposed Development will take place from two loading bays situated approximately 20m away from the proposed refuse stores. There will also be adequate space within the proposed dwellings and across the Site for refuse and recycling storage.
- 7.116 See the submitted Delivery and Servicing Plan submitted under separate cover for further details.

Other Environmental Factors

- 7.117 This section will briefly summarise the key chapters of other relevant documents submitted alongside this planning application such as air quality, noise and vibration and ecology/biodiversity, among others.

Daylight/Sunlight/Overshadowing

- 7.118 LBRuT Local Plan Policy LP8 (Amenity and Living Conditions) states the Council will ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development. An Impact on Neighbouring Properties Report has prepared by GIA to accompany the planning application. This report assessed a number of surrounding properties along King Street, Water Lane and the Embankment. The report concludes that the majority of neighbouring properties will adhere to the relevant BRE Guidelines but where there are breaches do occur, these are considered not significant and reasonable in the context of the Site's urban environment. The Proposed Development therefore complies with Policy LP8.
- 7.119 LBRuT Local Plan Policy LP8 (Amenity and Living Conditions) states the Council will ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development. A Daylight and Sunlight Assessment has been prepared by GIA to accompany the planning application. This assessment concludes that 87% of the 105 assessed rooms meet or exceed the recommended standard for daylight quantity, all rooms meet or exceed the recommended standards. All

living areas within the Proposed Development will enjoy an Annual Probable Sunlight Hours significantly above the recommended standards established in the relevant Building Regulations.

Air Quality

- 7.120 LBRuT Local Plan Policy LP10 part B (Local Environmental Impacts, Pollution and Land Contamination) requires development proposals in areas already subject to poor air quality to provide mitigation measures where appropriate. LBRuT Policy LP10 also requires an air quality assessment be provided which includes modelled data where necessary.
- 7.121 An Air Quality Assessment has been prepared by Entran Ltd in support of the application. This assessment states that the release of dust and particulate matter during the construction phase can be effectively mitigated through suitable mitigation measures such as the erection of solid screens or barriers as necessary. The Air Quality Assessment states the Proposed Development is Air Quality Neutral. The Proposed Development is therefore compliant with Policy LP10 part B.

Archaeology

- 7.122 LBRuT Local Plan Policy LP7 (Archaeology) requires desk based assessments and, where necessary, archaeological field evaluation will be required before development proposals are determined, where proposals are located on sites of archaeological significance or potential significance. A desk based assessment ('DBA') was prepared by AOC Archaeology Group and submitted in support of this planning application. The DBA outlines there may be moderate to high potential for late medieval and post-medieval archaeological remains, and low potential for prehistoric, Romano-British and early medieval remains. As such, a programme of archaeological mitigation may be required and these works are to be detailed by condition

Ecology and Urban Greening

- 7.123 LBRuT Local Plan Policy LP15 (Biodiversity) states the Council will protect and enhance the Borough's biodiversity by, among other things, supporting enhancements to biodiversity, incorporating and creating new habitats or biodiversity features into development proposals and maximising soft landscaping.
- 7.124 A Biodiversity Net Gain Assessment was prepared by BSG Ecology in support of this planning application. This outlines that the Proposed Development results in an overall net gain of 19% which significantly exceeds the 10% benchmark.
- 7.125 London Plan Policy G5 (Urban Greening) requires residential development schemes to have an Urban Greening Factor ('UGF') score of 0.4, and commercial development schemes to have a UGF score of 0.4. A UGF Report has been prepared by LDA which concludes the Proposed Development has a UGF score of 0.31. This is considered appropriate as the Proposed Development is creating habitats and the increased overall greening of the Site following the construction of the Proposed Development.

Noise and Vibration

- 7.126 LBRuT Local Plan Policy LP8 Part (4) (Amenity and Living Conditions) requires applicants to ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to, among other things, noise or vibration.

7.127 A Noise Assessment has been prepared by Tetra Tech in support of the planning application. This outlines that due to appropriate glazing strategies such as enhanced or double glazing, the Proposed Development will achieve the prescribed ventilation and internal ambient noise level requirements and not give rise to undue impacts on the amenity of surrounding occupiers.

Land Contamination

7.128 LBRuT Local Plan Policy LP 10 part (F) (Local Environmental Impacts, Pollution and Land Contamination) requires the remediation of contaminated land where required. It also requires potential contamination risks to be properly considered and mitigated before a development proceeds. A Site Investigation Report has been prepared by Geosphere Environmental which concludes the quality of the soils and groundwater sampled within this phase of investigation do not present a significant risk to all modelled receptors – including residential. The report also notes a further risk assessment should be undertaken inform on potential risk and continued design development with mitigation measures, if appropriate.

8. Planning Obligations and CIL

8.1 In accordance with Section 106 of the Town and Country Planning Act 1990 (as amended), planning obligations can be used as part of the planning application process to address specific planning issues arising from development proposals.

8.2 In respect of the negotiation of planning obligations associated with development, Paragraph 57 of the NPPF repeats the tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, which provide that planning obligations must only be sought where they meet all of the following tests:

- a) *“Necessary to make the development acceptable in planning terms*
- b) *Directly related to the development; and*
- c) *Fairly and reasonably related in scale and kind to the development”*

Community Infrastructure Levy

8.3 The development will be liable to Mayoral CIL in the form of MCIL2 at the following rates:

- All development - £80 per sqm.

8.4 In accordance with LBRuT's CIL Charging Schedule (adopted November 2014), the Proposed Development will be liable for CIL at the following rates:

- Residential development - £250 per sqm;
- Offices - £25 per sqm; and
- Retail - £150 per sqm.

9. Conclusions

9.1 Planning permission is sought for the:

'Demolition of existing buildings and structures and redevelopment of the site comprising residential (Use Class C3), ground floor commercial/retail/cafe (Use Class E), and public house (Sui Generis), boathouse locker storage and floating pontoon and floating ecosystems with associated landscaping, restoration of Diamond Jubilee Gardens and other relevant works.'

9.2 Having regard to NPPF Paragraphs 60, 119 and 120 (c)-(d), the Proposed Development will support development which makes efficient use of land by optimising a brownfield town centre site with high public transport accessibility. The Proposed Development will deliver the aims and objectives of the TAAP by bringing a derelict key town centre back into active use thereby contributing regeneration in the wider Twickenham town centre. The Proposed Development seeks to deliver 943 sqm of ground floor commercial/retail/public house/restaurant space which aligns with the TAAP. The net additional 55 sqm of office floorspace to be provided within the Proposed Development adheres with LBRuT Local Plan Policy LP41 and has been designed for flexibility to accommodate the demands of local SME's, which should be considered in the planning balance.

7.129 The Proposed Development delivers 45 new homes. Planning policy at the national, regional and local level recognises the need for the planning system to deliver new housing to meet a clear and significant need. The Local Plan directs 1000-1050 new homes to Twickenham. The use of this town centre site to deliver against the borough's housing targets is consistent with policy. The Proposed Development seeks to deliver a 50:50 split (by habitable room) of affordable housing. Further, the proposed affordable housing tenure comprises an 81:19 split in favour of low-cost rented homes. The policy compliant provision of affordable housing ought to be attract significant weight in the planning balance particularly in the context of a substantial need in the borough. Given the significant investment required to support the regeneration of the river frontage and the costs incurred by the Council, including land assembly, the delivery of a 50% affordable housing can only be secured with the support of GLA and council affordable housing grant. If grants are not available the Applicant would need to revisit the viability of the scheme given the funding gap that would be identified.

9.3 The Proposed Development incorporates a realigned flood wall which provides protection equal to or greater than the TE2100 defence level of 6.90. The proposed realigned flood wall alters the topography of the site to locate "More Vulnerable" and "Less Vulnerable" uses within Flood Zone 1. The repositioning of the vulnerable uses means there is no development within Flood Zones 3a and 2. The re-zoning of the site in the proposed condition, together with the location of the site within the TAAP proposal site and a major centre meet the conditions for an exemption to the requirement of the Sequential Test and as per LBRuT policy LP21. The proposed boathouse locker storage is a "Water Compatible" use and is therefore appropriate development in Flood Zone 3b according to Policy LP21.

9.4 The Proposed Development will result in a 2,834 sqm (c.65%) increase in public open space compared to the existing Site. This improved public open space will be provided through a range of different spaces such as the Town Square, Lawn Terraces and River Activity Zone. The proposed new public open space also features extensive repaving and seating for end-users of the Proposed Development. There is a small area of designated Metropolitan Open Land within the Site boundary and the provision of the pontoon and floating aquatic ecology basket are appropriate uses within Metropolitan Open Land which together with the overall development preserve the openness of the MOL.

- 9.5 The Water Lane building successfully corresponds with its townscape context by mediating between King Street's urban character to the north of the Site boundary and riverine character. The Wharf Lane building responds to its riverine context by featuring buff brick in its design in addition to its simple form roof design. These sensitive design treatments allows the Proposed Development to positively contribute to the setting and character of the Twickenham Riverside Conservation Area and provides a substantial improvement on the Site's current contribution to the conservation area. The submitted Heritage and Townscape Visual Impact Assessment identified the positive impact the Proposed Development has to the area's streetscape, character and appearance, over and above the existing buildings and structures within the Site boundary.
- 9.6 The Proposed Development results in a biodiversity net gain of 19% which exceeds the 10% minimum requirement to be mandated through national legislation. The Proposed Development incorporates a number of ecological enhancement measures including the retention of existing trees, introduction of damper planting areas, the creation of green walls, retention of insect hotels, the inclusion of bird and bat boxes and green roofs.
- 9.7 The Proposed Development meets the BREEAM 'Excellent' standard for its non-residential land uses. Further, the Proposed Development will achieve a combined on-site carbon emissions reduction of 54% against the Part L Building Regulations (2013). The Proposed Development has a thermally efficient envelope and highly efficient building systems and utilises Air Source Heat Pumps to reduce the Proposed Development's carbon emissions. The Proposed Development therefore contributes to the LBRuT's aims and objectives to reduce its carbon emissions.

10. Appendices

- EIA Screening Opinion
- Design Review Panel letters

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Associate Director
Aldermay House
10-15 Queen Street
London
wsp.com

07.05.2020

Dear Maeve McWilliams,

**Re: Proposed Development at Twickenham Riverside
Request for EIA Screening Opinion under Regulation 6 of the Town and
Country Planning (Environmental Impact Assessment) Regulation 2017 (As
Amended) (EIA Regulations)**

Thank you for your letter dated 1st April 2020, and validated 14 April, requesting a Screening Opinion from the Local Planning Authority for the proposed development at Twickenham Riverside.

I attach the Local Planning Authority's Negative Screening Opinion adopted on 7 May 2020, which concludes that the Authority does not consider the above development requires an Environmental Impact Assessment. In accordance with Regulations (5) and (6) of Part 2 of the EIA Regulations, the accompanying screening opinion provides clear and precise reasons for this conclusion.

Yours faithfully

Robert Angus
Head of Development Management

LONDON BOROUGH OF RICHMOND UPON THAMES

ENVIRONMENT AND COMMUNITY SERVICES, PLANNING AND TRANSPORT – DEVELOPMENT MANAGEMENT (PLANNING)

FORMAL EIA SCREENING OPINION

SITE: TWICKENHAM RIVERSIDE

PROPOSED DEVELOPMENT: A DETAILED PLANNING APPLICATION FOR A MIXED- USE DEVELOPMENT AT TWICKENHAM RIVERSIDE (DEVELOPMENT)

PREAMBLE:

THE EIA Screening Approach:

The project is proposed under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 regime.

The EIA Regulations Threshold:

A screening exercise has been undertaken in accordance with Regulation 5 and 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations). The Local Planning Authority (LPA) has had regard to the above regulations in addition to National Planning Practice Guidance (NPPG) when undertaking the screening exercise.

The EIA Regulations define 'EIA Development' in Regulation 2(1) as either:

- Schedule 1 development; or
- Schedule 2 development likely to have a significant effect on the environment by virtue of its size, nature or location.

The development is not a Schedule 1 development.

If the project is listed in Schedule 2, the LPA should consider whether it is likely to have significant effects on the environment. "Schedule 2 development" means development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where—

- (a) any part of that development is to be carried out in a sensitive area; or
- (b) any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development;

"sensitive area" means:

- (a) land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981;
- (b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949;
- (c) the Broads;
- (d) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage;
- (e) a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979;

- (f) an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000 as confirmed by the Secretary of State;
- (g) a European site;

The site is not located within a ‘sensitive area’.

The LPA is of the view that the proposal would be an Urban Development Project (including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiples cinemas) as defined under Schedule 2, Part 10 (B) of the Regulations, which has a relevant threshold of:

- i. The development includes more than 1 hectare of urban development which is not dwellinghouse development;
- ii. The development includes more than 150 dwellings; or
- iii. The overall area of the development exceeds 5 hectares

The NPPG states, “*the criteria and thresholds in column 2 represent the ‘exclusion thresholds’ in Schedule 2 of the Regulations, below which Environmental Impact Assessment does not need to be considered (subject to the proposal not being in a sensitive area)*”.

The NPPG also set out an indicative threshold, advising:

1. EIAs are unlikely to be required for the redevelopment of land unless:
 - the new development is on a significantly greater scale than the previous use, or
 - the types of impact are of a markedly different nature or there is a high level of contamination.
2. Sites which have not previously been intensively developed:
 - area of the scheme is more than 5 hectares; or
 - it would provide a total of more than 10,000 m² of new commercial floorspace; or
 - the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).

Again, the NPPG states “*when considering the thresholds, it is important to also consider the location of the proposed development. In general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely.*”

The proposed development has the following project quantities (Table 1), which confirms the **Development falls below the relevant threshold.**

Table 1: Project quantities

	Schedule 2 thresholds	Indicative thresholds	Proposed scheme
Site area	5ha	5ha	1.23ha
Number of residential units	150	1000	Approx. 54
Retail area			543m ²
Commercial area			1027m ²
Other uses			1000m ²
Total commercial floorspace		10,000m ²	2570m ²

<p>Area of urban development not including dwellinghouse development.</p> <p>(retail, commercial and other uses)</p>	<p>1ha</p>		<p>0.25ha</p>
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In addition to the above, and as outlined in the submission:

- The Site is currently developed and located within an urban area
- Whilst the Development would be on a greater scale than its existing use, the surrounding area includes built developments of a similar uses and scales.
- Given the surrounds, context and existing receptors, the type of impacts the Development will generate are not deemed markedly different in nature to those already in the area.
- It is not unusual for sites to have previous industrial land uses, with a contamination risk. However, such environmental effects can be adequately managed through typical best practice design measures and suitable conditions.

In summary:

- The development is not within a sensitive area
- The development does not exceed the Schedule 2 or indicative thresholds.
- The development is not Schedule 2 development.
- On review of the indicative thresholds and criteria, the specific nature and context of the Site, the existing development on the Site, the type and scale of Development, and the potential environmental effects, it is considered the Development does not represent EIA development.

Notwithstanding the above, the NPPG states, “*it should not be presumed that developments...falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits*”. Therefore, the submission has undertaken a high-level assessment to ensure that the site context and specific nature of the Development are given full consideration in reaching a final conclusion.

National Planning Policy Guidance (NPPG):

When screening Schedule 2 projects, the LPA must take account of the selection criteria in Schedule 3 of the EIA Regulations, however, the NPPG notes not all criteria will be relevant and each case should be considered on its own merits in a balanced way:

- Characteristics of development
- Location of development
- Types and characteristic of the potential impact

When the LPA issues its opinion, they must state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3.

Where it is determined that the proposed development is not EIA development, the LPA must state any features of Development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment. LPAs will need to consider carefully how such measures are secured. This will usually be through planning conditions or planning obligations, enforceable by the LPA which has powers to take direct action to ensure compliance.

Regulation 6 of the EIA Regulations

Regulation 6 (2) sets out the necessary information the person making a Screening Opinion request must provide. Table 2 shows the conformity with these requirements.

Table 2: Screening Opinion submission requirements

Regulation 6 requirements	Conformity
(a) a plan sufficient to identify the land;	yes
(b) a description of the development, including in particular— i. a description of the physical characteristics of the development and, where relevant, of demolition works; ii. a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;	yes
(c) a description of the aspects of the environment likely to be significantly affected by the development;	yes
(d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from— i. the expected residues and emissions and the production of waste, where relevant; and ii. (ii) the use of natural resources, in particular soil, land, water and biodiversity; and	yes
(e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.	yes (EIA Screening Checklist)

a) Identify the site.

The Site (as shown in the below extracts) extends to approximately 1.23 ha and is centrally located within Twickenham Town Centre and encompasses the whole of the riverside area between Water and Wharf Lane. It is bounded to the north by the commercial units fronting King Street, to the south by the River Thames (with Eel Pie Island beyond), to the east by residential dwellings fronting onto Water Lane and to the west by the side elevation of a commercial unit, an existing car park and a boundary wall running adjacent to Wharf Lane (with residential beyond).

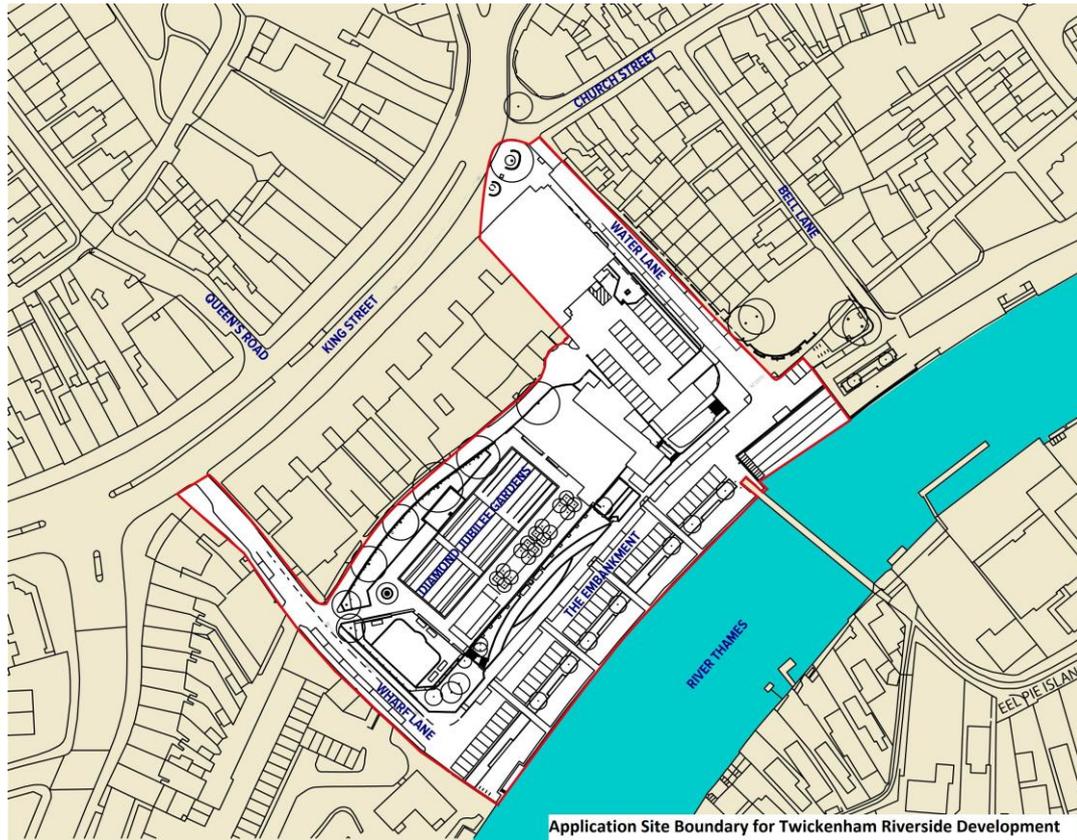
The only access to Eel Pie Island, other than by boat, is by foot-bridge, the northern end of which falls within the Site’s red line boundary.

The following uses currently occupy the site:

1. Diamond Jubilee Gardens. Hard and soft landscaped public open space which includes a play space and a small café centrally located within the Site;
2. Unit numbers 1, 1A, 1B and 1C King Street (currently retail and commercial uses). The pedestrian walkway directly in front of these buildings and the private car park to the rear.
3. A service road running to the rear of the commercial units on King Street, connecting Water and Wharf Lane;
4. The Embankment, which runs along the River Thames waterfront, between Wharf and Water Lane, providing parking and promenade for pedestrians and cyclists;
5. A one-storey pavilion building with a small publicly accessible terrace and benches that front onto the Embankment. To the west of this building and elevated above the

- road level is a two-storey property (Bath House) featuring flat roof and garage at roadside level. Access to the property is via a set of steps from the Embankment.
6. A red brick retaining wall forms the boundary to the built form and runs from the south of the King Street units along the eastern boundary of the car park on Water Lane. Here it wraps around to the south, in front of Bath House and the pavilion building and continues in south west direction along the entire stretch of the Embankment. It forms the southern boundary to the Diamond Jubilee Gardens;
 7. The Site includes a landscaped area of public realm to the south of Diamond Jubilee Gardens, which includes seating, raised planting beds and hard landscaping;
 8. One sub-station located within the Site boundary, which may be relocated as part of the Proposed Development.





b) a description of the development, including in particular (i) a description of the physical characteristics of the development and, where relevant, of demolition works;

Demolition: All existing buildings within the site boundary.

Proposed land uses:

- Approx. 54 residential units (ranging from studios to 3-bedroom apartments, with 50% affordable and disabled accommodation),
- Retail area extending to 543m², commercial area extending to 1027m² and other uses (food, beverages and amenity) extending to 1000m²;
- A newly invigorated Diamond Jubilee Gardens.
- Approx. 23 car parking spaces.

Physical characteristics of the development:

- A revitalised Diamond Jubilee Gardens (Gardens) elevated above the flood plain with a new play space and views over the River Thames (River). The Gardens will extend southwards into the new Riverside Market square located in the southern part of the Site and running adjacent to the River. This area will be car-free and will accommodate approx. 1,000 people for large events;
- A new café in the Gardens, located in the vicinity of a proposed new play area;
- A three-storey building located on Water Lane which will comprise mainly of apartments above retail and commercial uses. It will extend southwards along Water Lane from its junction with King Street and Church Street. A new access road will connect Water and Wharf Lane;
- A four to five storey building on Wharf Lane will be partially built on stilts over the embankment. Residential uses will be provided over commercial/other uses which will be located on the ground floor. A sharing Winter Garden space is also proposed in this area. A boathouse and market storage area will sit under this building

enabling engagement with the riverfront, though the boathouse will not directly connect with the water itself. There is also some plant accommodation to be located within a basement proposed to be cut into the rising ground below the proposed building on Wharf Lane;

- Numerous external spaces for a range of uses throughout the Site, including play spaces, recreational areas etc; and
- Car-parking provision, (some re-provision and some new):
 - 7 pay & display car parking bays;
 - 6 business/resident permit car bays;
 - 6 accessible car parking bays;
 - 3 loading bays for Eel Pie Island; and
 - 1 motorcycle space.

b) a description of the development, including in particular (ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

The submission describes the environmental sensitives of the geographical areas likely to be affected. This has been expanded upon with other available knowledge / sources. (Summarised in Table 3).

The site is located within Twickenham Town Centre and within the Twickenham Area Action Plan (TAAP). The frontage onto King Street is within the Key Shopping Frontage and adjacent to the Key Office Area. Whilst the area is predominately commercial, residential units occupy many of the floors above commercial properties within the area, and residential dwellings are opposite and adjacent the site in Water Lane, The Embankment, Cross Deep and Eel Pie Island in particular.

The site has good transport connectivity, with a PTAL rating of 5; and Twickenham Train Station is approx. 500m to the north of the Site, and numerous bus services on surrounding roads. The site is equally accessible for pedestrians and cyclists, with The Embankment forming part of a quiet cycle route. Within the site there is currently 80 car parking spaces.

Whilst there are no Listed Buildings or Buildings of Townscape Merit (BTMs) within the site boundary, the Site is within Twickenham Riverside conservation area; and Archaeological Priority Area; and adjacent to, Queens Road conservation area; BTMs in King Street, Water Lane and Eel Pie Island; and Listed Buildings at Thames Eyot, along The Embankment, King Street and Church Street.

There are no Grade I Listed Buildings or World Heritage Sites, Registered Parks and Gardens or Registered Battlefields within 100m of the Site boundary. However, York House Gardens, which is on the English Heritage register of historic parks and gardens, is to the east of the site (approx. 180m).

The site within Flood Zones 2, 3a and 3b, and has a flood defence extending across the Site.

Table 3: Summary of site designations:

Environmental sensitivity	Site	Within geographical area
Heritage Assets	<ul style="list-style-type: none"> ○ Twickenham Riverside Conservation Area ○ Twickenham and Marble Hill 	<ul style="list-style-type: none"> ○ Grade II Listed Buildings within 100m of the Site and a number of Grade II* Listed Buildings within

	<ul style="list-style-type: none"> ○ Archaeological Priority Area ○ Sites lies across the river from Eel Pie Island, where significant prehistoric remains have been recorded. 	<ul style="list-style-type: none"> ○ the wider area. ○ Adjacent to BTMs on Water Lane / King Street / Eel Pie Island ○ Opposite Queen’s Road Conservation Area. ○ Historic Park / Garden to east
Social economic	<ul style="list-style-type: none"> ○ Article 4: Restricting A1 To A2 ○ 1-33 King Street – Key shopping frontage ○ Brownfield Register ○ TW7 site allocation (TAAP) 	<ul style="list-style-type: none"> ○ Adjacent to Key Office Area
Transport	<ul style="list-style-type: none"> ○ PTAL 5 ○ Public highway – The Embankment and service road to the rear of King Street ○ Off road and quiet cycle route – The Embankment. 	
Ecology		<ul style="list-style-type: none"> ○ One statutory designated site, seven non-statutory designated Sites of Importance for Nature Conservation and five lowland mixed deciduous woodland Habitats of Principal Importance within a 1km radius; ○ Adjacent to the River Thames and Tidal Tributaries Site of Metropolitan Importance to Nature Conservation / Other Site of Nature Importance.
Pollution	<ul style="list-style-type: none"> ○ Air Quality Management Area ○ King Street – Air Quality Focus Area ○ Partly contaminated land 	
Flooding	<ul style="list-style-type: none"> ○ Flood Zone 2, 3a and 3b ○ Flood defence ○ Critical Drainage Area ○ Area susceptible to Surface Water Flooding. 	
Open Space / Townscape	<ul style="list-style-type: none"> ○ Partly Metropolitan Open Land ○ Thames Policy Area ○ Public Park / Open Space 	Adjacent to the River Thames

- c) a description of the aspects of the environment likely to be significantly affected by the development.
- d) a description of any likely significant effects of the proposed development on the environment resulting from
 - i. the expected residues and emissions and the production of waste, where relevant; and
 - ii. the use of natural resources, in particular soil, land, water and biodiversity; and

Summarised in Table 4: Environmental sensitivities and effects

The Site and its environmental sensitivity and aspects of the environment likely to be significantly affected	Description of Likely Environmental Effects
Air quality	<ul style="list-style-type: none"> • Demolition and construction • Dust particles • Emissions • Operational phase – traffic, emissions, mechanical plant
Noise	<ul style="list-style-type: none"> • New residential receptors and activities • Noise and vibration • Noise associated to construction and operational development.
Transport – cycle and pedestrian network; trains; car parking	<ul style="list-style-type: none"> • Impacts during demolition, construction and operation.
Ecology	<ul style="list-style-type: none"> • Birds • Bats • Aquatic • Ecological resource
Arboriculture	<ul style="list-style-type: none"> • Impact on trees during demolition, construction and operation.
Heritage - Archaeology, built heritage and conservation area	<ul style="list-style-type: none"> • Disturbance and visual impact during demolition and construction • Visual impact arising from finished development
Flood risk, drainage and water environment	<ul style="list-style-type: none"> • Impact upon flood defence • Increase in flooding • Runoff rates
Daylight / sunlight and overshadowing	<ul style="list-style-type: none"> • Impact on sensitive receptors
Ground conditions and contamination	<ul style="list-style-type: none"> • Pollutants released during demolition and construction
Materials and waste	<ul style="list-style-type: none"> • Waste production • Dust, noise and traffic associated to waste removal
Climate change / Greenhouse gas emissions	<ul style="list-style-type: none"> • Generation of greenhouse gases though construction and operation (heating and cooking) • Traffic associated to construction
People and communities	<ul style="list-style-type: none"> • Accidents during construction • Contamination • Employment, housing, community and open space facilities,
Major Accidents and disasters	<ul style="list-style-type: none"> • Flooding • Malicious attacks • Unexploded ordnance

- e) Other information the person making the request may wish to provide; and features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

An EIA Screening Checklist accompanied the Request. This includes measures anticipated to mitigate likely significant environmental effects.

SCREENING OPINION

Regulation 5(4) of the Regulations and NPPG require the LPA to consider the screening criteria set out in Schedule 3 of the Regulations:

1. *Characteristics of development*
2. *Location of development*
3. *Type and characteristics of the potential impact*

To aid LPA's to determine whether a project is likely to have significant environmental effects, the NPPG sets out an indication of the types of impact that are most likely to be significant for particular types of development. Of relevance to this Development are:

- Physical scale,
- Potential increase in traffic, emissions and noise.

Whilst any development will have an impact on the environment, which will be considered against the Development Plans and guidance as and when an application is submitted, for the purpose of this Screening Opinion, consideration is given to whether the development is likely to give rise to significant impacts in context of the EIA Regulations.

(1) Characteristics of the Development

- a) The characteristics of development must be considered with particular regard to the size and design of the whole development**

Whilst there are open areas within the Site, namely to the south adjacent to the River and the existing Diamond Jubilee Gardens, the Site is predominantly hard surfaced with extensive parking, and where there are buildings, these are mostly 1-2 storeys.

The Development includes the demolition of all existing buildings and wholesale redevelopment:

- A revitalised Diamond Jubilee Gardens, which will remain elevated above the floodplain, and extend southwards
- A riverside market square in the southern part of the Site, adjacent to the River.
- Numerous external spaces for a range of uses throughout the Site
- Car parking provision (reprovision and new)
- New access road connecting Water and Wharf Lane
- New buildings:
 - A new café in the Gardens
 - A three-storey building located that will extend southwards along Water Lane from its junction with King Street and Church Street.
 - A four to five storey building on Wharf Lane, partially built on stilts over the embankment.

Whilst the Development will cause physical changes to the site and surrounds, the submission confirms sensitive design measures considering scale, massing and height in relation to existing setting will be inherent within the design. By reason of such, the sites location and when considering local context, is not deemed to cause significant effect, particularly given the following documents will be required upon submission, which will assist in demonstrating no significant effect:

- Design and Access Statement
- Photomontages
- Streetscape drawings
- Open Space Assessment
- Landscape Design Strategy
- Hard and Soft Landscaping

b) The characteristics of development must be considered with particular regard to the cumulation with other developments

Whilst there may be potential for cumulative effects during construction, especially given the current redevelopment of Twickenham Station and Richmond College, it is deemed this can be controlled through appropriate conditions / heads of terms, such as Construction Logistics Plan (of which a framework will be necessary at time of submission). Given the limited size and nature of the Development; its location and site allocation designation; the cumulative impacts of the Development are not deemed to give rise to significant environmental effects.

c) The characteristics of development must be considered with particular regard to the use of natural resources, in particular land, soil, water and biodiversity

Land and natural resources:

Whilst land and natural resources will inevitably be utilised, the impacts will not be significant. The Site represents a developed site located within an urban area, is on the Brownfield Register and also has a site allocation for redevelopment (TW7 TAAP). In addition, the submission confirms:

- the waste hierarchy will be applied;
- sustainable materials will be utilised during the construction stage;
- energy efficiency will be designed in to the proposed development;
- separate energy and sustainability statements will be prepared.

Geology and Hydrogeology

A Desk Study and Ground Investigation Report was prepared in 2017 which related to the eastern part of the Site. The British Geological Survey (BGS) map of the area indicates that the eastern part of the Site is underlain by Langley Silt over Kempton Park Gravel, which in turn is underlain by the London Clay Formation. The Kempton Park Gravel is classified by the Environment Agency as a Secondary 'A' Aquifer which is defined as permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. Groundwater is likely to be present at the base of the Kempton Park Gravel and flowing towards the River.

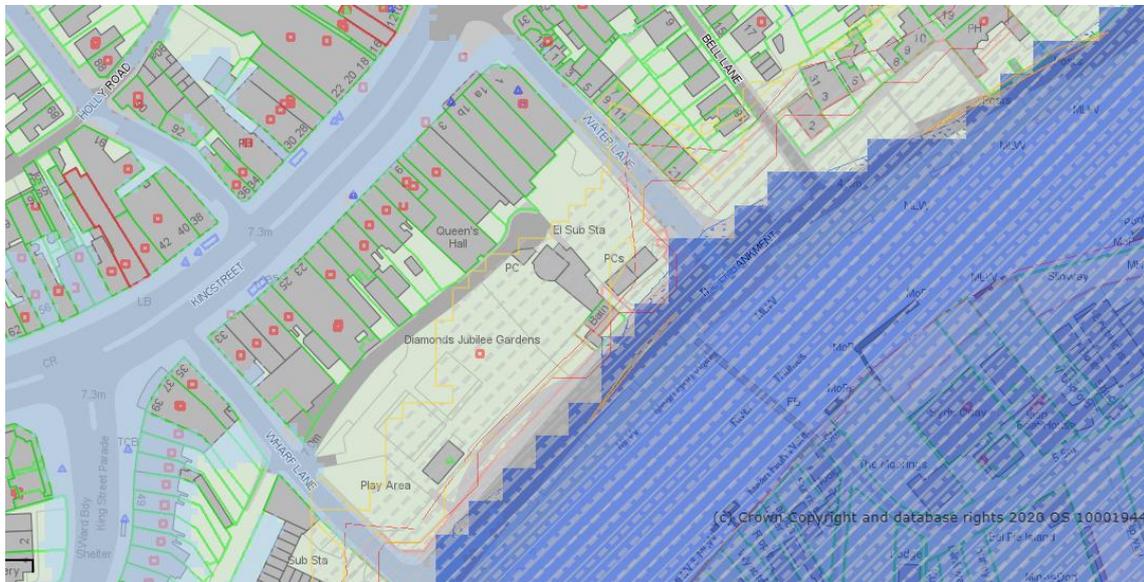
The Site has a designation of partially contaminated land. A former 2017 study identified that there were areas of contamination within the southern parts of the Site.

There is potential for pollutants to be released into the ground or into surface water, however, these are not deemed to be significant with the following mitigation:

- DCEMP to include the storage, use and handling of substances and materials, refuelling and fuel/oil storage and procedures for surface water management.
- Phase 1 Land Contamination Desk Study Report be prepared and submitted
- Preliminary risk assessment and where necessary include recommendations of further detailed site investigations.
- Remediation Method Statement
- Validation report submitted to and approved by LBRuT.

Surface Water and Flooding

The roads surrounding and within the site suffer from surface water flooding (light blue); the south-eastern part of the site is flood zone 3b - functional floodplain (dark blue). The south-eastern half of the site is located within flood zones 2 and 3. The site has a flood defence running across the site (pink), and the existing development forms part of that flood defence. The site is also within a Critical Drainage Area.



Given the flood zone, critical drainage and surface water designations, and flood defence forming part of the existing site, there is risk of flooding both at construction and operational development.

The submission confirms, in line with NPPF requirements, the following documents will accompany a planning application / designed into the scheme:

- A Flood Risk Assessment (FRA): This will investigate the potential sources of flooding and demonstrate any flood risk relating to the Development or caused by the Development elsewhere is mitigated using appropriate design solutions and management procedures;
- Outline Drainage Strategy (incorporating a London Sustainable Drainage Proforma and Statement on Sustainable Drainage Systems)
- Suitable levels of attenuation will be incorporated into the Development.

During construction, the effects are unlikely to be significant if appropriate best practice demolition and construction techniques are adopted in accordance with a DCEMP. Further, with the aforementioned documents, design and mitigation measures (and measures outlined below), the operational Development is not deemed to give rise to significant risk of flooding, either on Site or in the surrounds:

- Incorporation of flood resilient design
- Constructed in accordance with the approved documents;
- Retention of the effectiveness, stability and integrity of flood defences and river banks;
- Retaining essential maintenance and upgrading to be carried out in the future on the existing flood defence;
- Taking account of the requirements of the Thames Estuary 2100 Plan and the River Thames Scheme.

The Borough's Highway Asset Manager also makes the following recommendations:

- The functional floodplain should not be incorporated within the development nor should the development reduce the Flood Plain Area, which may affect local flood water levels. This is equally applicable both during Construction and Operational development.
- A safe Escape Route / Evacuation Plan must be devised, notified to all occupants and implemented at all times.
- Subscription to Environment Agency Flood Warning Service
- The Drainage Strategy should aim to discharge surface water to the River, subject to removal of contaminants by suitable SuDS measures.
- If works to the flood defence are made, temporary defences, to a standard approved by Environmental Agency, must be in place at all times.

The Environment Agency are not a statutory consultee for EIA Screening Opinions. However, they wish to offer pre-application advice – refer to Appendix 2.

Biodiversity: The site is not subject to any statutory or non-statutory nature conservation designations. However:

- There is one statutory designated site within a 1km radius: Ham Lands Local Nature Reserve.
- There are seven non-statutory designated Sites of Importance for Nature Conservation within a 1km radius.
- There are five lowland mixed deciduous woodland Habitats of Principal Importance within 1km of the Site;
- The Site is located adjacent to the River Thames and Tidal Tributaries Site of Metropolitan Importance to Nature Conservation;

A Preliminary Ecological Appraisal (PEA) was prepared in October 2017 which related to the majority of the Site except Wharf Lane and the Embankment. It comprised a Phase 1 habitat survey (undertaken in May 2016), a protected species assessment and an evaluation of the Site's importance for nature conservation. The key findings were:

- The main habitats present included hardstanding/buildings, amenity grassland, broadleaved woodland, species-poor non-native hedgerows, dense scrub, introduced shrub and scattered trees;
- Habitats present at that time (2016) were considered to be of local value and included lowland mixed deciduous woodland and a hedgerow. Hedgerows are a Priority Habitat in the LBRuT. In 2019 the updated LBRuT Biodiversity Action Plan included a Habitat Action Plan for Hedgerows;
- Several buildings and trees were identified as having the potential to support roosting bats. Further Bat surveys were recommended at that time to include internal building inspections and a preliminary ground level roost assessment of trees;
- Buildings and vegetation within the Site boundary were identified as having the potential to support breeding birds;

- Habitats suitable to support hedgehogs was identified. The report recommended that measures should be taken to continue accommodating this species on site post development.
- Deadwood suitable for stag beetles was identified and best practice should be followed during the removal of any trees/tree stumps; and
- The Site includes an area of self-seeded trees considered to be of only local value but is likely to be a stepping stone to other areas of woodland/habitat

A Preliminary Bat Roost Assessment was undertaken in July / August 2017:

- The four buildings which were inspected were assessed as having low potential to support roosting bats.
- All trees within and four mature trees immediately adjacent to the redline boundary were assessed as having negligible potential to support roosting bats.
- One dusk emergence survey was carried out on the four buildings in August 2017. No bats were recorded as emerging from, or suspected as having emerged from, any of the buildings within the Site. Limited commuting and foraging activity by three common species of bats was recorded on Site.

In terms of the potential impacts and necessary mitigation, the submission identifies:

- An updated PEA (including Phase 1 habitat mapping and any required protected species survey) is undertaken.
- Any recommendations set out in the PEA will be designed into the Development and secured by a planning condition.
- The potential effects on biodiversity arising from the demolition, construction or operation can be mitigated through:
 - Timing of works (such as vegetation clearance outside of bird nesting season (or under supervision or supervised demolition of structures outside of bat maternity season)
 - Provision of compensatory roosting/nesting features in new buildings and foraging habitats
 - New landscape strategy.
 - Appropriate licences with regard to any bat roosts are obtained to allow legal demolition of buildings/structures.
 - Improvement to London's urban ecological resource.

The Council agrees that with the above mitigation measures, in addition to those identified below, significant impacts on the biodiversity value of the site and those adjacent (including the river) can be avoided:

- PEAs are now superseded by Ecological Impact Assessment (EclA). Therefore, an EclA (including Phase 1 habitat mapping and any required protected species surveys) as per CIEEM 2019 guidance and BS 42020:2103 must be undertaken and submitted. And, any recommendations adopted and designed into the scheme.
- Demolition and Construction Environmental Management Plan (DCEMP)
- Drainage Construction Runoff Strategy
- Surface Water Strategy
- Contamination and remediation strategies

d) The characteristics of development must be considered with particular regard to the production of waste

Construction: The Development would by its very nature generate waste, associated with the construction, demolition of existing buildings and excavation of the basement area. This is not deemed to be significant and effects can be controlled / mitigated by:

- Pre-demolition audit – providing details on materials that can be reclaimed and recycled and assist in waste segregation recommendations.
- Effective water suppression during demolition
- Buildings soft stripped inside before the demolition process commences.
- Construction traffic route information / agreement
- Investigation to see if construction materials can be used efficiently on-site and that all re-useable wastes recovered, re-used or recycled wherever possible.
- Approval and implementation of a Waste Management Plan and Demolition and Construction Environmental Management Plan that follows the waste management hierarchy (reduce, reuse and recycle).

Operation: A Waste Management Strategy that deals with operational waste and informs the design process (to also include appropriate refuse and recycling facilities) will be submitted with the application.

e) The characteristics of development must be considered with particular regard to pollution and nuisance

Noise pollution:

- Construction: Noise and vibration generated during the demolition and construction phases could have some negative effects within the surrounding area / receptors. However, it is deemed typical industry standard noise mitigation measures set out in DCEMP and piling methodology, secured via condition, and implemented as approved will reduce and minimise potential effects.
- Operational: There is potential for a change in noise and vibration, both for existing and future receptors. The submission recommends baseline noise measurements at several locations are undertaken to establish the range in existing noise levels. The results of the noise survey and design recommendations will be contained within an Acoustic Assessment and/or Acoustic Design Statement which will be submitted with the planning application as a supporting planning document. The Council agrees with such and recommends this informs the design. Conditions can be imposed to ensure noise and vibration do not cause significant effects, for example: hours of uses; noise limits for mechanical plant; anti-vibration equipment, noise insulation etc. The above is supported by Environmental Health who deem noise and vibration during both construction and operation can be controlled by way of acoustic assessment and condition.

Light pollution:

The submission does not consider the effects on light pollution directly. Both construction and the Development have the potential to cause light pollution. During works, it is recommended a DCEMP is secured (either at time of submission or by condition) that addresses the impact of light pollution and how this will be minimised. For example,

- Keeping construction lighting (amount, level and hours) to an absolute minimum;
- Sensitive lighting design to prevent spillage onto features including the River / trees;
- Lighting strategy to ensure no negative effects on river navigation and river ecology

The submission confirms a Lighting Strategy will be submitted with the application. It is recommended this should inform the design, and safeguarding conditions can be secured to ensure there are no significant effects.

Land / soil contamination:

- Construction: There is a potential for pollutants to be released into the ground or into surface water during demolition and construction. However, it is deemed this could be suitably addressed through mitigation measures:
 - Demolition and Construction Environmental Management Plan (to include the storage, use and handling of substances and materials, refuelling and fuel/oil storage)
 - Procedures for surface water management.
- Operation: Any potential impacts on existing receptors surrounding the Site and future receptors, can be suitably controlled through an update Phase 1 Land Contamination Desk Study Report, including a preliminary risk assessment, and conditions to ensue any recommendations / further site investigations and remediation and validation reports are submitted, implemented and verified.

Climate Change and Greenhouse Gas Emissions

- Construction: During demolition and construction, different types of materials will be required, and the generation of greenhouse gases associated with the production of such materials is acknowledged, in addition to traffic movements that may generate greenhouse gas emissions. It is deemed these will not give rise to significant impacts, and conditions can secure appropriate mitigation, for example, a DCEMP (turning off/throttling down plant and equipment when not in use and minimising deliveries)
- During operation:
 - The Development will have significantly reduced car parking provision compared to the current situation.
 - Whilst the proposed uses will give rise to greenhouse gases through the use of natural resources and through the heating and cooling of buildings, there are policy requirements for standards, both carbon and air quality, which will aim to minimise the impact
 - Energy and sustainability statements will be prepared and submitted in support of the planning application and recommendations applied within the Development.

As such, appropriate mitigation measures will be secured either through the application of policy or conditions to ensure both construction and operation do not cause significant impacts.

f) The characteristics of development must be considered with particular regard to the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;

The nature of the Development is not deemed to result in the potential for major accidents and disaster events to occur, however for proportionality, the evaluation process of such major accidents and/or disasters has been considered:

- Flooding, in response to the sites location within flood zones and a flood defence running across the site, the submission confirms a FRA and Drainage Strategy will be provided, demonstrating any flood risk is mitigated using appropriate design solutions, drainage measures (including climate change allowances) and management procedures;
- Malicious Attacks (Terrorism). The current threat level for international terrorism in the UK is 'substantial'. The Development will incorporate Secure by Design principles to increase its resilience in the event of a malicious attack; and
- Unexploded Ordnance – A Desk Study and Ground Investigation Report was undertaken in 2017, which included a preliminary UXO Risk assessment. It recommended that due to the known falling of a V-1 bomb immediately south of the

Site a detailed risk assessment should be completed. An updated Preliminary UXO Risk Assessment, which will include an initial UXO search, will be undertaken and submitted with any forthcoming the planning application.

Whilst not referred to, there is the risk of marine / aquatic pollution from construction runoff. However, with the implementation of a DCEMP the risk associated with the impact of accidental pollution events is considered low and can be mitigated.

Port of London were notified of the Screening Opinion request. Given the location of the Development, and the potential for high numbers of people expected to visit the riverside area, the following mitigation measures are recommended:

- Provision of appropriate Riparian Life Saving Equipment (such as life buoys, escape ladders and grab chains) along the riverside,
- Introduction of suicide prevention measures, for example, CTV and appropriate signage.

Based on the above, it is deemed any risk to major accordance or disasters can be mitigated.

g) The characteristics of development must be considered with particular regard to the risks to human health (for example, due to water contamination or air pollution).

- Construction: As with any development there is the risk that accidents could occur. However, it is deemed that this can be controlled / mitigated through:
 - health and safety legislation
 - good site management procedures
 - construction management plans
 - DCEMP
 - remediation strategy
- Operation: The submission confirms a Health Impact Assessment will be submitted, and a remediation strategy would be a condition of any consent granted to ensure contamination does not risk existing and future residential receptors. In addition, the FRA and Drainage Strategy will investigate flooding and demonstrate flood risk is mitigated both on site and around.

The potential risk to human health, considering mitigation measures, is not deemed to be significant.

Summary – On the basis of the information provided, by reason of the scale and nature of the Development, the temporary duration, reversibility and intensity of such impacts though construction, in addition to the environmental context of the site and potential mitigation measures, significant environmental effects are not considered likely.

(2) Location of Development

The site is within a relatively densely populated area in Twickenham Town Centre and is considered to be highly visible from the nearby residential developments on Eel Pie Island, surrounding developments and river and riverside users. Whilst the Site does not lie within or adjacent to a 'sensitive area' as defined in the EIA Regulations, the Development is in an environmentally sensitive location, designated an Archaeological Priority Area, lying partly within the Thames Policy Area, Flood Zones and adjacent to the River Thames (designated Metropolitan Open Land and an Other Site of Nature Importance) and within the Twickenham Riverside Conservation Area, and adjacent to other Heritage Assets,

designated and non-designated. The proposal will need to be mindful of these important constraints and designations and potential impacts should be diminished through appropriate design and mitigation measures.

a) The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to the existing and proposed land use

The site is within an urbanised area within a town centre boundary and incorporates leisure, commercial and open space land uses. Surrounding the Site are similar uses, including residential. Whilst the Development would be on a greater scale than its existing use, given the proposed uses are similar to those already found either on site or in the surrounds, no significant effects on existing and proposed land uses are identified:

Transport: The Site is highly accessible:

- Within PTAL 5
- Located on a TfL Strategic Road Network
- Twickenham Railway station – approximately 5-10 minutes away, providing services to London Waterloo, Reading, Windsor and Eton Riverside and Wimbledon.
- Bus services - Accessed from Cross Deep, Heath and London Road and York Street
- The Embankment – Forms part of a cycle route and has a segregated promenade along the waterfront for pedestrians and cyclists.
- With respect to parking provision:
 - There is a private car park to the rear of King Street;
 - The on-street parking within the site boundary is controlled by Central Twickenham Car Parking Zone, that operates between Monday to Saturday 8.30am to 6.30pm (Bank and Public holidays free).

The Proposed Development will have a 'car lite' approach, replacing the 80 current spaces with approx. 23. The parking currently located on The Embankment (between Wharf Lane and Water Lane) will be relocated and or removed in line with LBRuT aspirations, and the proposed parking provision will include:

- 7 pay & display car parking bays;
- 6 business/resident permit car bays;
- 6 accessible car parking bays;
- 3 loading bays for Eel Pie Island; and
- 1 motorcycle space.

The following documents will accompany an application:

- Transport Assessment
- Construction and Logistics Plan;
- Delivery and Servicing Plan;
- Travel Plan;
- Active Travel Zone assessment; and
- Car and Cycle Parking Management Plan.

Construction: It is deemed the demolition, construction or operational effects of the proposed development will not be significant, subject to securing through conditions and Heads of Terms, and the implementation of approved plans and strategies:

- Construction Management and Logistics Plan.
- Compliance with Considerate Constructors Scheme
- Consideration given to the potential use of the River Thames for the transportation of construction materials and waste
- Diversions of any cycle / pedestrian routes, with clear signage

- Provision of details on how access to Eel Pie Island via the footbridge will be maintained.
- Communication strategy to local residents prior to and during demolition and construction to inform residents of any roads or transport networks being temporarily closed or diverted.

Operational: Given the limited scale of the development (in terms of land uses) and reduction on car parking on site, this is not deemed to cause significant trip generation effects on the highway network. Whilst the reduction of on street parking may impact the highway network, with the following measures secured through condition or Heads of Terms, the impact is not deemed to be significant:

- Transport Assessment – including survey work on existing parking on street and in surrounding car parks and details of location and hours of serving / loading bays
- Delivery and Servicing Plan;
- Travel Plan;
- Car and Cycle Parking Management Plan.
- CPZ permit restrictions
- Possible car park provision and / or membership
- Meeting minimum cycle parking provision
- Way finding signage

Navigation:

- The red line boundary extends into an area of the PLAs navigational jurisdiction to the east of the footbridge at the southern end of Water Lane including the river steps which lead down to the foreshore. The PLA must be contacted with regard to any proposals for this specific area. (Refer to Appendix 1 – Map of PLA's navigational jurisdiction).

Socio-economic and community:

- Residential, sport and leisure clubs / activities and businesses are located close to the site, including Eel Pie Island)
- There is a cycle route on The Embankment.
- Diamond Jubilee Gardens provides public open space, including a play space and a small café.
- There are commercial premises on King Street that form part of the Site, which will be demolished.
- The service road to the rear of King Street provides access to the commercial and residential units along King Street.

Whilst the construction has the potential to impact upon access to both Eel Pie Island and the rear of premises along King Street, it is deemed this can be adequately mitigated through, Construction Management Plans, Access Plan, and on street car parking / loading bay management plan. Similarly, any impact upon the cycle route can be mitigated through a diversion scheme with appropriate signage. For general riverside users, there should be clear communication and signage regarding construction programme, so they can be kept informed.

The operational development is not deemed to give rise to unacceptable impacts given the servicing access road; business / permit and loading bays, river access and a rejuvenated park will be incorporated into the scheme.

Future land uses:

The Site comprises one section of the Twickenham Riverside and Approaches (TW7) allocation within the adopted TAAP. In particular, the site forms part of proposal site

TW7, which sets out general principles, policy and guidance with respect to any future development. The proposed uses respond to the TAAP aspirational land uses for the Site.

Employment:

The site currently generates employment, primarily through the commercial premises facing King Street. Whilst these buildings will be demolished, the Development proposes approx. 2500m² of commercial / retail and other uses that will provide long term operational employment opportunities. This is in addition to the short term opportunities through construction. As such, the scheme is not deemed to give rise to significant effects.

Demographics:

By reason of the limited number of residential units proposed, the context and character of the surrounds, the Development is not deemed to significantly alter the demographics in the area.

Wind climate:

Wind and the impact of the construction and Development on such, has not been addressed within the submission. However, given the Sites location, surrounding pattern of development, existing buildings on site, and limited scale of the Development, this is not deemed to result significant effects.

Daylight, sunlight, overshadowing and solar glare

The development may change light conditions to receptors adjacent to the site. The submission confirms a Daylight, Sunlight and Overshadowing Study will be prepared in line with current guidance and submitted with the planning application, which will assess the impact of the Development on surrounding sensitive receptors and the outputs of the study will inform the iterative design process. This is deemed a reasonable approach.

- b) The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard to the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground**
and
c) The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to the absorption capacity of the natural environment, paying particular attention to the following areas

Wetlands, riparian areas, river mouths and coastal zones and the marine environment

The Site falls within the Thames River Basin District – and Thames River Basin Management Plan. Given the site boundary, the Development has the potential to impact upon the River, bank and associated aquatic receptors. Whilst not included within the submission, it is recommended that any application is accompanied with the following to demonstrate the impact, and outline any recommendations / mitigation that may be necessary to avoid any significant impacts:

- Water Framework Directive Assessment:
- Aquatic Ecology Desktop Study: Impact from, for example, water contamination and disturbance.
- A DCEMP.

Riparian areas: A four to five story building will be built on stilts on Wharf Lane, and as part of this structure a boathouse and market storage area will sit under the building

enabling engagement with the waterfront. The PLA will need to review the detailed plans of this part of the development, and its interaction with the river environment. Any temporary or permanent works in or over the river will require a river works license with the PLA. For further information please visit <http://www.pla.co.uk/About-Us/River-Thames-Development-and-Works-Enquiries> or contact the PLA licensing team at lic.app@pla.co.uk

Marine environment: The site is located on the Tidal Thames, that runs west to Teddington. Whilst adjacent to the River, it is deemed with appropriate mitigation, such as DCEMP, aquatic ecology study and implementation of appropriate recommendations; surface water drainage strategies, the marine environment will not be significantly impacted upon.

Wetlands / river mouths / coastal zones – no significant impact by reason of distance and scale and nature of the development.

- Mountain and forest areas – N/A.
- European sites and other areas classified or protected under national legislation; and nature reserves and parks

The submission identified the Site is not subject to any statutory or non-statutory nature conservation designations, however, there is one statutory designated site, seven non-statutory designated Sites of Importance for Nature Conservation and five lowland mixed deciduous woodland Habitats of Principal Importance within a 1km radius. The Site is located adjacent to the River Thames and Tidal Tributaries Site of Metropolitan Importance to Nature Conservation.

Site Name	Distance from site and orientation
River Thames and Tidal Tributaries	30m to the south.
Ham Lands	180m to the south.
Petersham Lodge Wood and Ham House Meadows	902m to the east.
River Crane at St Margaret's (Richmond side)	1000m to the north.
Marble Hill Park and Orleans House Gardens	850m to the north-east.
Twickenham Junction Rough	700m to the north-west.
Moor Mead Recreation Ground	600m to the north.

Given the separating distance between the site and the some of the above areas; the temporary nature of the construction, and applying mitigation measures, significant effects upon such areas is not envisaged.

- Areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
The whole Borough is within an Air Quality Management Area due to exceedances of nitrogen dioxide (NO₂) and particulate matter (PM₁₀) annual mean objectives and the PM₁₀ 24-hour mean objective. The Site also fronts King Street, which is part of

Twickenham Air Quality Focus Area, where existing levels of pollutants are above EU limit values of 40 µg/m³ for nitrogen dioxide.

The LBRuT operate three static automatic monitoring sites and one mobile automatic site which record concentrations of both NO₂ and PM₁₀. LBRuT also operates an extensive network of diffusion tubes across the Borough measuring concentrations of NO₂, including, 15 Richmond Road; 32 King Street and 65 York Street. The annual mean NO₂ concentrations are consistently above the 40 µg/m³ objective limit at all three monitoring sites. The Site is located to the south of King Street and based on the data, 2 concentrations of NO₂ are expected to exceed the annual mean objective. The Council will be concerned at levels of NO₂ and PM's for all receptors both during the construction phase and once completed.

Construction: During the demolition and construction phase, dust and particulate matter are likely to be generated, which may result in localised and temporary adverse impacts to local receptors. Emissions associated with non-road mobile machinery and construction vehicles could also cause potential air quality impacts. It is deemed such impacts can be mitigated through, A DCEMP; Best practice construction techniques and Dust Management Plan – for example, procedures setting up barriers around dust generating activities; avoiding storing stockpiles of loose material on site; installing wheel washes and vehicle cleaning facilities; ensuring not-in-use vehicle engines and plant motors are switched off and ensuring all plant and vehicles are properly maintained.

Operation: The submission recognises local air quality has the potential to change in comparison to the current baseline, particularly for traffic related pollutants including NO₂, PM₁₀ and fine particulate matter (PM_{2.5}). However, the reduction in car parking within the site boundary will help to reduce vehicle traffic and improve air quality within this area. In addition to the measures outlined in the submission, the effects from air quality could be reduced through conditions / Heads of Terms, restricting CPZ permits; securing Electric Vehicle Charging Points; Travel Plans etc. An Air Quality Assessment will be submitted (with reference to both policy and SPD requirements). Pollutant concentrations will be predicted at relevant existing and proposed sensitive receptors to ascertain the impact. Predicted pollutant concentrations will be compared to the relevant air quality objectives and if necessary, appropriate mitigation / design measures will be recommended to reduce or remove any potentially adverse air quality impacts identified.

In summary, it is considered impacts on air quality both through construction and operational development can be mitigated through assessments (informing design), best practice and conditions / Heads of Terms. This is supported by the Air Quality officer.

Densely populated areas:

The Site is essentially an island, surrounded by residential, leisure and commercial population, and the Development has the potential to cause impacts on such receptors, particularly in terms of:

- Noise, vibration, emissions, dust during construction
- Noise and light pollution from proposed use
- Visual impacts through construction and the Development
- Pressure on local green space and parks through additional residential uses
- Changes in lighting conditions
- Flood risk and contamination
- Changes to parking conditions

The above matters have been discussed elsewhere in this report. Given the scale, siting, nature and temporary duration of the Works, the surrounding context and considering

measures and mitigation that could be applied and controlled through relevant Environmental and Health and Safety legislation and planning conditions (and information necessary for validation of any application), the development is not deemed to give rise to significant effects.

- Landscapes and sites of historical, cultural or archaeological significance:

Heritage Assets:

Archaeology: The site is within Twickenham and Marble Hill Archaeological Priority Area, which GLAA has confirmed the potential for significant heritage assets of archaeological interest. Investigations nearby at King Street, Water Lane and Church Street uncovered medieval and post-medieval features surviving. The Site lies across the River from Eel Pie Island, where significant prehistoric remains have been recorded. A second Archaeological Priority Area, the Thames Foreshore and Bank (Site 22) extends immediately south of the Site along the channel of the Thames and its foreshore. GLAAS deem that the site is large and potentially significant. However, it is deemed the demolition, construction or operational effects of the Development can be mitigated through an updated Archaeological desk based Assessment, sensitive design informed by the Assessment, consultation with the GLAAS, archaeological evaluation and appropriate conditions / mitigation, for example, watching briefs and verification reports.

Conservation Areas, Listed buildings and Buildings of Townscape Merit:



The site is within Twickenham Riverside Conservation Area (Area 8) and sited opposite Queen's Road Conservation Area. A key significance of Twickenham Riverside CA is its historic and architectural value of the original village core and river frontage. The conservation area, in so far as it relates to the site, can be divided into three main elements – the Village Core; The Embankment river frontage and Eel Pie Island. The townscape of the Village Core is characterised by two-three storey buildings and the narrowness of the streets, which have developed organically. Although some buildings, including the Barclays Bank, stand out as landmarks, its overall value is derived from its character as a tightly defined townscape, and the visual and physical links and access between the village core and the river. Eel Pie Island has its own distinct character, with a mixture of industry and residential development of mixed date, many of which are designated BTMs.

There are no Listed Buildings or BTMs on the site, however, a significant number in the surrounds, including those in Table 5 and Register of Historic Parks and Gardens to the east of the site.

Table 5: Heritage Assets

Buildings of Townscape Merit (BTMs)	Listed Buildings
<ul style="list-style-type: none"> • Eel Pie Island, opposite the site • Water Lane, opposite to the Site • Queens Hall, on King Street, backs onto service road • King Street, opposite the Site 	<ul style="list-style-type: none"> • King Street, opposite the site • The Embankment, to east of site • Bank, corner of Church and King Street • Boathouse – Cross Deep, adjoining west boundary • K6 telephone kiosk

During construction, with good practice and site management (i.e. appropriate hoarding) will avoid significant effect. The submission states sensitive design measures will be inherent within the scheme, informed by the Heritage Assessment. As such, it is deemed the impact will not be significant.

Historic England were notified of the Screening Opinion request, and do not have any observations to make, confirming they would be a statutory consultee on any resulting planning application, and will comment at that stage.

Townscapes and landscapes:

- The Site is within the Thames Policy Area and Thames Landscape Strategy:
- Whilst there are no Tree Preservation Orders (TPOs) on the site, the Conservation Area Status offers them statutory protection. The last Arboricultural Impact Analysis (2017) identified 49 trees located within or adjacent to the site, including trees located on the Embankment (from review, whilst the site boundaries are different from the earlier scheme, this survey appears to encapsulate the trees within the proposed Site). These identified 1 Category A tree on King Street, mostly Category B within the site and some Category C.
- The River and parts of The Embankment are Metropolitan Open Land (MOL)

The submission recommends a fresh Arboricultural Impact Assessment is prepared and submitted with the planning application, including a Tree Survey and an Arboricultural Method Statement. It is inevitable that any scheme on this site is going to impact upon trees and the landscape in general. Regardless to the ‘value’ in the tree in the published 2017 report, the existing trees provide a green backdrop and contribute to the public visual amenity. The submission confirms the tree report will be used to inform the design process and set out mitigation measures and working practices if required to avoid or mitigate impacts to existing trees during demolition, construction and operational phases. The Council agrees that if the Tree Surveys inform the siting and design, and with appropriate mitigation measures in place, that can be secured by condition (or S106 if a CAVAT necessary), and with an appropriate landscape strategy, and the demolition, construction or operational effects of the Proposed Development on trees within the Site boundary will not cause significant effects.

The construction works will increase the physical presence of the construction and vehicles, within this high quality townscape and landscape. However, any visual effects are to be limited, localised and temporary.

The presence of the structure will have a visual impact upon the MOL, Thames Policy Area, and impact upon their setting and visual openness. However, with sensitive design and a Design and Access Statements, Open Space Assessments, Landscape

Strategy, CGIs that can inform the design, and in response to the urban context, it is deemed significant effects can be avoided.

Summary – The Development would be an enlargement on an existing area of low intensity use and will inevitably comprise a physical change to the locality. However, given the scale, land use and nature of the Development and environmental context of the area, the magnitude, intensity and duration of any impacts on the environmental sensitivities of the area, are not deemed to be significant.

(3) Type and characteristics of the potential impact: The likely significant effects of the development on the environment must be considered in relation to

- **criteria set out in points 1 and 2 (characteristics and location of the development)**
- **with regard to the impact of the development on the factors specified in Regulation 4(2),**
 - a) population and human health;**
 - b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(1) and 2009/147/EC(2);**
 - c) land, soil, water, air and climate;**
 - d) material assets, cultural heritage and the landscape;**
 - e) the interaction between the factors referred to in sub-paragraphs (a) to (d)**
- **taking into account the**
 - a. magnitude and spatial extent of the impact**
 - b. nature of the impact;**
 - c. transboundary nature of the impact;**
 - d. intensity and complexity of the impact;**
 - e. probability of the impact;**
 - f. expected onset, duration, frequency and reversibility of the impact;**
 - g. cumulation of the impact with the impact of other existing and/or approved development;**
 - h. possibility of effectively reducing the impact.**

The criteria set out in Part 3 of Schedule 3 of the Regulations have been considered. The Development, both during construction and operation, will impact upon several areas of acknowledged interest within the London Borough of Richmond upon Thames. Given the location of the development and its scale, this is not deemed to cause transboundary effects.

Construction: Whilst the impacts through the works will be frequent, the impacts are not overly complex or uncommon for the Borough; temporary in nature and duration; a number being reversible (construction waste, air, noise, traffic, visual impact of associated construction equipment), with the mitigation measures put forward and recommended (to avoid significant effect), these are not deemed significant. It is probable the Works will generate short term employment opportunities:

- **Population and human health:** The works will impact upon population and human health, However, by reason of the temporary nature of the works and such impacts being typical to construction sites, these are not unusual or complex. Possibility of accidents can be reduced through DCEMP, FRA, appropriate survey / investigation / watching briefs, etc.
- **Biodiversity:** The site is not subject to any statutory or non-statutory nature conservation designations. Whilst the site is adjacent to a Site of Metropolitan Importance to Nature Conservation and within 1km of statutory and non-statutory designated sites, the

Development is not deemed to be particularly complex, and can be avoided through mitigation measures. Again, such effects are reversible.

- Land, soil, water, air and climate: With mitigation measures, the Works are not deemed to have a significant effect on high quality, or natural or scarce resource or land stability and climate. The Works will inevitably add to air pollution, however, given the limited duration, measures to control and measure this, it is not deemed to lead to significant effect.
- Material assets, cultural heritage and the landscape: The physical presence of vehicles machinery, structures, hoardings will impact upon the openness and setting of the MOL, heritage assets, the quality of the Thames Policy Area and the visual appearance of the site and area in general. However, this is not complex, uncommon, of any great magnitude, is temporary and reversible, and with further assessments and mitigation measures, the impacts can be reduced and not significant.

Completed Development: The development could have an impact upon a number of areas of acknowledged interest, including visual impact, traffic generation, wildlife corridor/habitats, local character and street scene, and some of these potential impacts would not be reversible. However, these would be limited to the immediate locality, can be mitigated against, and it is not deemed to be of such significance to warrant an EIA:

- Population and human health: The Development will have the potential to impact upon the population, by (for example) light conditions and pollution, flooding, navigation, travel and visual effect. However, with the recommended mitigation and reports as suggested, the nature, intensity complexity is not deemed of significance.
- Biodiversity: It is deemed effects will not be complex and can be avoided through sensitive design, appropriate retention of landscaping and mitigation measures (such as lighting strategies, surface water drainage plans, landscaping and ecological enhancement proposals).
- Land, soil, water, air and climate: Any impacts are not deemed complex or of magnitude and can be mitigated. The development has a site allocation proposal designations and is on the Brownfield Register. The Development will be subject to current planning policy and practice, such as Air Quality Neutral, Zero Carbon, and the need for developments to take into account climate change when designing against flood risk. The scheme is car lite, and measures can be incorporated to ensure sustainable travel.
- Material assets, cultural heritage and the landscape: The site is within and adjacent to Heritage Assets, both designated and non-designated, MOL and the Thames Policy Area. The development will cause physical changes to the site and surrounds. Given the local context, modest scale, sensitive design and through recommendations (archaeological, visual and Heritage Impact Assessments), and mitigation, this impact is not deemed complex, and can be reduced / mitigated.

Therefore, it is of the LPA opinion the Development would not trigger the need for an Environmental Statement, under the terms of the EIA Regulations, to accompany any future planning application and any environmental effects associated with the Development can be adequately dealt with via the normal planning application process. The detailed planning application will need to be supported by an extensive suite of environmental technical studies and operational management plans. On this basis, significant environmental effects are not considered likely.

Mitigation measures

The EIA Regulations (5.5b) and NPPG state, “Where it is determined that the proposed development is not Environmental Impact Assessment development, the authority must state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment”. Further,

“Local planning authorities will need to consider carefully how such measures are secured. This will usually be through planning conditions or planning obligations, enforceable by the local planning authority which has powers to take direct action to ensure compliance”.

Taking into consideration the environmental information submitted and measures envisaged to avoid or prevent adverse effects on the environment, the potential impacts are effectively reduced. The tables below summarise the mitigation measures (Table 6) put forward by the applicants (refer to submission, supporting checklist and this report for full details) or recommended by the LPA. These would either be secured by condition or a Section 106 Legal Agreement, and / or be necessary at the time of submission (Table 7). In addition, measures could be applied and controlled through relevant Environmental and Health and Safety Legislation, to reduce the extent, duration, probability, frequency, magnitude, intensity of potential impacts.

Table 6: Mitigation Measures

Environmental Effect	Measures anticipated to mitigate likely significant environmental effects	Further mitigation measures recommended by LBRuT
Natural Resources	<ul style="list-style-type: none"> • DCEMP be prepared and implemented or a Code of Construction Conduct to be secured by planning condition. • Sensitive design measures considering scale, massing and height in relation to existing setting will be inherent within the design, where possible • Use of sustainable materials, where feasible • An energy efficient development in line with planning policy requirements • Separate energy and sustainability statements 	
Waste	<ul style="list-style-type: none"> • Waste Management Strategy considering demolition, construction and operational waste streams – follows the waste management principles – reduce, reuse and recycle. • Aggregate from demolition may be used in the construction of new buildings. 	
Pollution	<ul style="list-style-type: none"> • DCEMP • Air quality assessment - Policy requirements in the Local Plan 2018 and relevant SPD. • Best practice construction techniques • Dust Management Plan • Separate energy and sustainability statements prepared and submitted • Noise survey and design recommendations relevant to the operational phase will be contained within an Acoustic Assessment and/or Acoustic Design Statement • Phase 1 Land Contamination Desk Study Report, to include a preliminary 	<p>Construction management measures and good practice, including</p> <ul style="list-style-type: none"> • adherence to working hours, • use noise reducing techniques with low noise emission machinery, • ongoing noise monitoring • methodology for installing the piles <p>Operation:</p> <ul style="list-style-type: none"> • hours of uses; • noise limits for mechanical plant; • anti-vibration equipment, noise insulation etc

	<p>risk assessment and recommendations of further detailed site investigations (and implementation of remediation strategy and verification reports)</p> <ul style="list-style-type: none"> • Design measure to promote sustainable transport modes, including: <ul style="list-style-type: none"> ○ Transport Assessment; ○ Construction and Logistics Plan; ○ Delivery and Servicing Plan; ○ Travel Plan; ○ Active Travel Zone assessment; ○ Car and Cycle Parking Management Plan. 	<ul style="list-style-type: none"> • CPZ permits; • Electric Vehicle Charging Points; • Travel Plans etc.
Population and human health	<ul style="list-style-type: none"> • DCEMP • Health and safety legislation • Good site management procedures • construction management plans • Flood Risk Assessment • Drainage strategy • Risk of Unexploded Ordnance (UXO): Appropriate survey / watching brief or specialist attendance during construction • Remediation strategy • Health Impact Assessment • Design Out Crime / Secure by Design principles • Lighting strategy 	<ul style="list-style-type: none"> • Design criteria set by Environment Agency • Incorporation of flood resilient design • Retention of Flood Defence • Safe Escape Route / Evacuation Plan / signing up to EA Flood Warning Service • Risk of marine pollution disaster: Implementation of a Construction Environmental Management Plan. • Suitable lighting design • Prior notice of the works should be given to the local community, • Towpath diversions • Landscaping • Sunlight / Daylight and overshadowing assessment – and development to respond to results. • Local Employment agreement – construction and operation (if over 20 employees) • Provision of appropriate Riparian Life Saving Equipment • Introduction of suicide prevention measures
Water resources	<ul style="list-style-type: none"> • Flood Risk Assessment • Drainage strategy • Appropriate attenuation • Implementation of a DCEMP 	<ul style="list-style-type: none"> • Design criteria set by the Environment Agency • Retention of Flood Defence • Water Framework Directive Assessment:
Biodiversity	<ul style="list-style-type: none"> • EclA, • Phase 1 habitat survey • Any recommendations set out in the EclA implemented - For example, <ul style="list-style-type: none"> ○ Timing of works - outside of bird nesting season or supervised 	<ul style="list-style-type: none"> • DCEMP • Drainage Construction Runoff Strategy / surface water strategy • Contamination / Remediation strategies • Consultation with Natural

	<p>demolition of structures outside of bat maternity season;</p> <ul style="list-style-type: none"> ○ Provision of compensatory roosting/nesting features ○ landscape strategy. ○ Appropriate licences sought <ul style="list-style-type: none"> ● Arboricultural Impact Assessment ● Tree Survey ● Arboricultural Method Statement 	<p>England</p> <ul style="list-style-type: none"> ● Birds: <ul style="list-style-type: none"> ○ Ecological watching brief to ensure that the trees and shrubs are clear of nests. ○ Nest boxes for breeding birds. ● Bats: <ul style="list-style-type: none"> ○ Bat surveys ○ Retention of mature trees ○ Avoidance of impacts to bat roost ○ Climbing tree inspection ○ Lighting kept to an absolute minimum and designed to prevent light spilling ● Potential for ecologist during vegetation clearance to move any individuals to alternative suitable habitat ● Aquatic Ecology Desktop Study
<p>Landscape and townscape</p>	<ul style="list-style-type: none"> ● Design and Access Statement ● Sensitive design measures ● Photomontages ● Streetscape drawings ● Open Space Assessment ● Arboricultural Impact Assessment ● Tree Survey ● Arboricultural Method Statement 	<ul style="list-style-type: none"> ● Landscape Design Strategy ● Replacement tree planting / landscaping ● Site segregation for construction site activities ● Maintenance of construction site hoarding. ● CAVAT contribution for loss of trees
<p>Cultural / Heritage and Archeology</p>	<ul style="list-style-type: none"> ● Design and Access Statement ● Archaeology and Heritage Assessment 	<ul style="list-style-type: none"> ● Consultation with the GLAAS ● Archaeological evaluation - watching briefs and verification reports. ● Good practice during construction – hoarding etc.
<p>Transport</p>	<ul style="list-style-type: none"> ● Transport Assessment ● Construction and Logistics Plan; ● Delivery and Servicing Plan; ● Travel Plan; ● Active Travel Zone assessment; ● Car and Cycle Parking Management Plan. ● Design process will take account of all transport-related constraints ● Communication to residents prior to and during demolition and construction to inform of any roads or transport networks being temporarily closed or diverted. 	<ul style="list-style-type: none"> ● Compliance with Considerate Constructors Scheme ● Consideration must be given to the potential use of the River Thames for the transportation of construction materials and waste ● Diversions of any cycle / pedestrian routes, with clear signage ● Provision of details on how access to Eel Pie Island via the footbridge will be maintained during the construction period. ● Parking surveys - car parks and on street)

		<ul style="list-style-type: none"> • details of location and hours of servicing / loading bays • CPZ permit restrictions • Possible car club provision and / or membership • Meeting minimum cycle parking provision • Way finding signage
Land stability and climate	<ul style="list-style-type: none"> • Flood Risk Assessment • Drainage Strategy • Energy and Sustainability Statement, and recommendations applied to the development • DCEMP 	

Table 7: Submission deliverables (refer to Local Validation Checklist)

Environmental Effect	Submission requirement	Recommended submission requirement
Socio-economic, Community and Transport	<ul style="list-style-type: none"> • Transport Statement: <ul style="list-style-type: none"> ○ Details of any stopping up orders / section 278 works ○ Details of towpath / cycle diversions • Highway and parking Layouts – existing and proposed (including turning circles for proposed) • Construction Management Statement / Logistics Plan • Travel Plan • Statement of Community Involvement • Daylight/sunlight/overshadowing assessment • Health Impact Assessment • Affordable housing statement and associated visibility report • Play and child occupancy assessment • Playing fields and sports facilities assessment • Residential standards statement • Inclusive access statement • Marketing reports for loss of commercial / employment or communities uses • Retail Impact Assessment 	<ul style="list-style-type: none"> • Design Out Crime / Secure by Design consultation results • Phasing details
Surface Water and Flooding	<ul style="list-style-type: none"> • A Foul Water and Utilities Statement • Flood Risk Assessment (including impact on defences) • London Sustainable Drainage Proforma • Statement of SUDs 	
Ecology;	<ul style="list-style-type: none"> • EclA • Mitigation and enhancement measures / plans • Demolition and Construction Environmental Management Plan (DCEMP) • Drainage Construction Runoff Strategy 	

	<ul style="list-style-type: none"> • Arboricultural Survey Report • External lighting assessment • Green / brown roof details 	
Archaeology and Heritage	<ul style="list-style-type: none"> • Heritage Statement (in conjunction with The Historic Environment Record) • Archaeological Statement 	
Townscape and Landscape	<ul style="list-style-type: none"> • Design and Access Statement • Photomontages • Streetscape drawings • Open Space Assessment • Landscape Design Strategy • Tree Survey • Arboricultural Impact Assessment • Arboricultural Method Statement • Hard and Soft Landscaping (including tree planting and aftercare) 	
Air Quality and Climate Change	<ul style="list-style-type: none"> • Air Quality Assessment • DCEMP • Sustainable Construction Checklist • BREEAM Pre-Assessment • Energy Report • National Water Standards Statement • Decentralised Energy Network Feasibility 	<ul style="list-style-type: none"> • Dust Management Plan • NRMM compliance with Stage IIIB emission criteria of Directive 97/68/EC and its subsequent amendments
Noise and Vibration	<ul style="list-style-type: none"> • Acoustic Assessment • DCEMP • Odour Assessment 	<ul style="list-style-type: none"> • Noise and Vibration Construction Method Statement • Piling and equipment method statement
Land Contamination	<ul style="list-style-type: none"> • Land Contamination Assessment 	
Waste	<ul style="list-style-type: none"> • DCEMP • Waste Management Plan 	
Major Accidents and/or disaster And risk to human health and safety	<ul style="list-style-type: none"> • DCEMP • Construction Management Plan • Flood Risk Assessment and drainage strategy • Contaminated Land report and remediation strategy 	<ul style="list-style-type: none"> • Site investigation scheme for potential unexploded ordnance • Lighting strategy • Secure by Design

In addition to the above mitigation measures and necessary documents to accompany any application, the Development will need to take account of:

- NPPF and NPPG
- London Plan (Adopted and Draft)
- Local Plan
- Twickenham Area Action Plan
- SPD and SPGs

Conclusion

The submission and accompanying checklist have provided details of the likely significant effects. The impact, both individual and cumulatively, with future and surrounding receptors and on the surrounding environment, whether it is on transport networks, green networks and space, local character and openness, flood risk, noise and air quality will all need to be evaluated at the time of submission. However, at this time, given the location, scale and nature of the Development, the measures proposed in the design process, the local context, and the ability to secure mitigation through conditions and legal agreements, the Development is not likely to result in significant effects on the environment by virtue of factors such as its nature, size or location, nor does the Council consider the proposed development will result in any usually complex, significant or potentially hazardous environmental effects. The potential effects of the proposal are considered likely to be of a more localised nature and not so significant in terms of their magnitude/extent or sensitivity to warrant a full assessment by way of an Environmental Statement.

The scheme does not trigger the relevant EIA thresholds for the type of development.

In accordance with Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, the London Borough of Richmond hereby determines the proposed development does not warrant the submission of an Environmental Impact Assessment / Environmental Statement, as set out in the meaning of the EIA Regulations 2017.

Decision: Negative Screening Opinion

Date of Opinion: 7 May 2020

Robert Angus

A handwritten signature in black ink, appearing to read 'R. Angus', is written over a light blue rectangular background.

Head of Development Management

APPENDIX 1 – Port of London Authority - Navigational Jurisdiction

APPENDIX 2 – Environment Agency (Extract from their letter)

Advice to the applicant We would like to offer the applicant the following advice with respect to pre-application advice and flood risk:

Pre-application advice

As highlighted in the EIA Screening Opinion Request letter by WSP (dated 1 April 2020), the site is highly sensitive to flood risk. The site is located adjacent to the River Thames and is partially within Flood Zone 3a and partially within Flood Zone 3b. Furthermore, the existing development forms part of the statutory flood defence line. We objected to a previous scheme due to it not adequately addressing these issues.

We are keen to work with the new applicants to ensure any revised scheme addresses these complex issues. We invite the applicant to contact us as early as possible. These pre-application discussions will ensure a robust flood risk assessment is carried out and used to influence the design of the development and avoid an objection.

Please email ksplanning@environment-agency.gov.uk and we can provide you with more details about our pre-application advice service and our cost recovery offer. As this service falls outside of our statutory remit, we charge for our advice. Our charges are currently £100 plus VAT per officer per hour.

Flood Risk

Through our charged pre-application service we hope to work with you to address our concerns regarding flood risk. We have provided comments our initial thoughts below:

Any development must achieve appropriate set back from the flood defences. We would object to any building forming part of the defence line or buildings on stilts over the flood defence. This restricts access for maintenance, emergency works and inspections. Proposed development must not impact the structural integrity of any flood defence.

The flood defence line must be formed of permanent, fixed structures. We would not permit the use of moveable structures, such as flood barriers or gates. Flood defence heights must be maintained and raised in line with the Thames Estuary 2100 Plan. A continuous flood defence line must be maintained at all times.

Site users must be kept safe from flooding for the lifetime of the development. Finished floor levels must be set appropriately and we strongly advise incorporating additional resistance and resilience measures.

We strongly recommend addressing our Estuary Edges guidance to incorporate biodiversity enhancements into the management of the riverside and to address biodiversity net gain. Intertidal terracing, soft bank edges and bank landscaping could be explored and the flood defence line incorporated into this design. These enhancements must not conflict with the flood risk elements. We would not support any further encroachment of the flood defence line on the river.

We hope you find our response useful. Please contact us if you have any further questions.

Yours sincerely,

Miss Rachel Holmes
Planning Advisor

Direct e-mail rachel.holmes@environment-agency.gov.uk

**Richmond
Design Review Panel
C/o Richmond Council**

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Our ref: ECS/
Your ref:
Date: 6 May 2021

Iyabo Johnson
Planning
Savills
33 Margaret Street
London
W1G 0JD

Dear Iyabo

Richmond Design Review Panel: Twickenham Riverside, London, TW1

The Panel is grateful to you and your development team for submitting your proposal to the Richmond Design Review Panel (RDRP) on Tuesday 13 April 2021. In light of the Government restrictions following the coronavirus outbreak the Panel was not able visit the site and meet your team in person, however the Panel provided feedback in a virtual open session with the applicant present to hear the Panel's views. We therefore thank the applicant team and, in particular the architects and landscape architects, Hopkins Architects and LDA Design, for a clear and comprehensive presentation of the proposals. This letter will remain confidential until a formal planning application has been submitted, whereupon it will be uploaded to the Council's application website.

The Twickenham Riverside site extends to approximately 1.23 ha and is centrally located within Twickenham Town Centre and encompasses the whole of the riverside area between Water and Wharf Lanes. It is bounded to the north by the commercial units fronting King Street, to the south by the River Thames (with Eel Pie Island beyond), to the east by residential dwellings fronting onto Water Lane and to the west by the side elevation of a commercial unit, an existing car park and a boundary wall running adjacent to Wharf Lane (with residential beyond).

The following designations are of interest to the site:

- Twickenham Riverside Conservation Area
- Archaeological Priority Area
- River Thames (and part of The Embankment) – Metropolitan Open Land,
- Twickenham Town Centre and Key Shopping Frontage along King Street
- Thames Policy Area
- Flood Zone 2 and 3 and flood defence
- Site forms part of proposal site TW7 of the Twickenham Area Action Plan.

In terms of heritage, the site is adjacent to:

- Buildings of Townscape Merit: East side of Water Lane and corner of Church Street; properties on the north bank of Eel Pie Island; Queens Hall (King Street)
- Listed Buildings – Boat House to the rear of Thames Eyot on the site's west boundary; Bank on the corner of King Street, Church Street and York Street; and properties along The Embankment.
- Queens Road Conservation Area (north side of King Street).
- River Thames – Other Site of Nature Importance.

The aim of the proposals is to bring the derelict and underused site back into active use, take advantage of its riverside location; improve links with the core of the town and retaining open green space. Specifically, it involves the following:

- Demolition of 1, 1A, 1B and 1C King Street, and replacement with a 'flipped' L shape 4 storey building, extending south along Water Lane, and partially to the rear of the service road, providing approximately 600m² of retail and café floorspace at ground floor level and 21 residential units above (Affordable).
- Erection of a part 4-5 storey wharf building adjacent to Wharf Lane with approximately 800m² commercial (office, pub, retail) at ground floor (and small basement) and 25 residential flats above.
- Removal of most of the car parking along the Embankment, except for some limited spaces associated to Eel Pie Island. The Embankment would become an area of open space, potentially for markets / events, and river related activities.
- A series of other open spaces to replace the Diamond Jubilee Gardens, with lawns, seating terraces, playspace and a pétanque area. These are both at a lower level adjacent to the river, at a higher level (in response to flooding). Access is achieved via ramps and steps ensuring access for all.
- Changes in ground levels prevents linking the service road to Water Lane, and subsequently, the Embankment would be used during limited hours for servicing and deliveries. Water and Wharf Lane are proposed to become two-way for all other vehicles. Alterations will be made to parking bays along Water and Wharf Lane.

The Panel's detailed comments are set out below:

Concept Design

The Panel acknowledges that Richmond Council commissioned the Royal Institute of British Architects (RIBA) to deliver a design competition in 2019 where Hopkins Architects, and their concept design, were chosen as winner by a Design Panel established for the competition. The ambition of the design competition to reactivate this underused and derelict area and provide an active connection between King Street and the River Thames is key to the concept proposed and very much supported.

- The Panel is therefore very pleased with the masterplan presented. The arrangement of the buildings that bookend the public realm which takes centre stage is very welcome. We are however slightly concerned that the ambition to accommodate the requirements and needs of the many stakeholders involved has somehow diluted the initially strong and clear design concept that made up the applicant's winning competition entry. While we think the fundamentals of the initial scheme are still there, we suggest the design team revisit these and bring them out more strongly.
- In particular, we note the strong measures required by the Environment Agency on retaining the flood storage capacity of the site with a 4m exclusion zone as well as the level of prescriptiveness for the uses accepted in the space. We think though that this has resulted in a substantial amount of underused space in the flood zone and consequently the siting of the many functions in the area above the flood line. The effect feels cramped and disjointed.
- We welcome the support from the Council to extend the lease with the Twickenham Riverside Trust for the use of the Town Square area along the river for events and gatherings.

Public Realm and Landscaping

We note the amount of functions the scheme is trying to incorporate and how the landscape is grappling with the many issues effecting the site, from floodplain and vehicular movement to servicing for Eel Pie Island. As a result, the uses feel crammed into the portion of the site that is not subject to flooding, leaving a large portion of the remaining site paved and undefined. In our view the consequence is a lack of distinctiveness of the landscape, its character has yet to emerge.

- We feel the landscape lacks a clear identity of intent, and coherence in the shape and form. It reads compartmentalised and disjointed into a series of outdoor rooms in the landscape with little or no hierarchy, creating pinch-points that detract from a natural pedestrian flow in order to stay out from the floodplain. In our view the landscaping should be more unified, more confident with a clear character and provide better use and form to the flood zone areas whilst retaining flexible use.
- Widening Water Lane and creating a more inviting and pedestrian friendly link from King Street and the embankment along the River Thames is welcome. We think however that more could be done to accommodate all users, as pedestrians, bicycles and cars will be using the street. Perhaps markets could take place here to enliven the street.
- We are concerned about the service road to the north of the site. This area needs more focus and perhaps a destination to ensure future usage and deter anti-social behaviour. In our view this is a missed opportunity for a more active frontage along the road. How future developments on King Street will relate to the site should be considered.

- We are not convinced the gates are required at the end of the service road. These create a barrier that hinders pedestrian movement through the site. Greater legibility for the street is required as it terminates in a vehicle turning head. A more considered and legible solution should be found to accommodate pedestrian and vehicular movement.
- Overall, we think there is poor connection between the Water Lane building and the Wharf Lane building and that the legibility and movement throughout the site could be further improved.
- For pedestrians coming down Wharf Lane, the space opens up creating the opportunity for various desire lines, the entrance by the service road, the clear path diagonally through the site and alongside the Wharf Lane building towards the river. Overall, we feel there needs to be more clarity and hierarchy of desire lines and further consideration of the route to the bridge to Eel Pie Island.
- The relationship between paving, greening and lawn areas, the pétanque and play area is unconvincing. We feel these relationships and positions of the zones need to be reviewed and consideration of broadening usage into the flood zone be considered. The landscape needs on balance to have more area of green and less hardstanding.
- In relation to the Town Square, this is a very important component of the scheme. Consider bringing more flexibility to this area for its multifunctional aspects to come out stronger.
- The awkward arrangement of the Wharf Lane building creates a central courtyard space that in our view should be more integrated with the wider part of the public realm, rather than a left-over space. Consideration should be given to the pub and its dedicated spaces being part of the overall open space composition of the Town Square.
- We are not convinced about the large paved areas with planting elements on either side of the Town Square. It feels unresolved and not fully celebrating the river with planting and seating. Rather retain the concept of a line of trees to celebrate the river frontage. It could be a simple solution that helps provide a strong frame to the landscape.
- Consider how people will be using the different waterside areas. Perhaps moving the pontoon away from the corner and more towards the Town Square, it will be more overlooked and visible for pedestrians moving around the site.
- A clearer solution for bikes and bike racks, especially coming from the east should be sought.
- The Eel Pie Island servicing area at the bottom of Water Lane with its large expanse of paving for turning lorries is not well resolved and could perhaps be better defined, contained and greener.
- The notion of people laying on a moulded lawn is welcome as grass can withstand flood water. The use of grass as lawn could be extended and used into the flood zone.
- We are very encouraged to hear about the effort given to enhancing bio-diversity aspects and urban greening factor on the site. We think that in light of the past year, a post-Covid scenario would call for a greener and softer environment for people to enjoy with larger portion of planting and trees.

- Overall, given the amount of people coming into the site, the space should be more flexible and we suggest being more confident on how the landscape can spread and resolve this duality of the site while being a single coherent piece of public realm.

Architecture

The site is located in a very rich, complex and dense area in Twickenham. The rich heritage context of the town centre is in juxtaposition to the industrial nature of the steel framed boatyards on Eel Pie Island and further down the river. Corrugated iron and steel are part of the material palettes to be found in the area. Within this scenario we support the brave move to bring some of that industrial aesthetic onto King Street as a way of creating a stronger link between the town and the river. Therefore, the strong coherent architecture proposed is generally supported. However, we suggest the design team undertake a rigorous heritage assessment and review the historical context and setting relative to the River Thames and Eel Pie Island, in order to gain a thorough understanding of the character of the site and its surroundings which may help unlock some clues to achieve a better integration of the proposals.

Specifically, we support the employment of industrial materials but push the design team to create something finer and more delicate with them.

Water Lane Building

- The Water Lane building has the important role of drawing people in and enticing them along Water Lane and down to the river. Within the historical context of the town centre, and the maritime feel of the embankment, the Panel thinks that having the building punching out onto King Street is successful.
- We are comfortable with the height proposed and generally welcome the strong and linear roofline as a strong visual link to the river. We support the building reflecting the wharf character of the boatyards down the river and on Eel Pie Island as a proud and confident addition to the existing fabric of the high street.
- We discussed whether breaking up the roofline would break up the buildings rather monolithic structure. However, given the building will not be seen in its entirety and visitors will only be able to appreciate it in modules, the Panel suggests to look at bringing more refinement and detailing to the elevations instead. At present due to the expanse of red brickwork, the elevations, particularly the one on Water Lane, reads a little ordinary and in danger of blending in too much.
- The uniqueness of Church Street is the finer grain of its fabric and the variety of the small retail units that bring vibrancy and joyfulness to the street. We think that more consideration should be given to pull the same joy and refinement to Water Lane as a way of enlivening the frontage and be more attractive for pedestrians.
- The choice of materiality here is quite critical. The use of zinc for the roof feels robust and industrial for the building and some of the Panel Members queried whether slate or tiles has been considered instead. We think that further justification for the approach used for the roof material will be required and linked back to the heritage assessment analysis. We urge on achieving the highest quality in detailing and materiality as this will be decisive for the success of this contemporary building and the scheme overall.

Wharf Lane Building

- The Panel is not convinced about the design for the Wharf Lane building. We think the building needs further refinement and a stronger and more unique identity. This is a prominent building and we are concerned about the north-east elevation which shows a blank façade onto the centre of the site due to the single aspect arrangement of the flats. In our view the corridors along the elevation are a missed opportunity to make best use of the amazing views onto the river, and we are less concerned about issue of overlooking the small courtyard. Could there perhaps be social spaces along the corridors where residents can gather?
- In terms of articulation, the marine character could come out stronger and thus employ the use of more exciting materiality that could reflect more and provide a clearer link to the Water Lane building on the opposite side. Overall, we think it could stand there a little prouder and bolder, given its prominent location visible from the river and from afar.
- There is concern the small courtyard to the east could be overshadowed and thus become less inviting and usable.

Pavilion

- The Panel is not entirely convinced about this single storey building adjacent to the Wharf Lane building. If the landscape would be more organic in that location, we think it could be more like a beacon and potential focal point for the site, as proposed it appears too small and lost next to the taller Wharf Lane building.
- Particularly the courtyard space to the rear appears undefined and as aforementioned overshadowed. Could it perhaps address the performance space on the Town Square more?

Moving Forward

The Panel applauds the team for a very creative and innovative scheme, and we thank you for the very clear and comprehensive presentation. This is a very complicated site to develop due to its constraints and significant range of stakeholders involved. We are however fully supportive of the concept design that developed from the outcome of the design competition, and of the ambition to unlock the potentials of the site and reconnect it to the high street and the wider setting of the River Thames, its landscape and the adjacency of Eel Pie Island.

We think the fundamentals of the scheme are good but there is still room to push harder for further improvements. The clarity and quality of architecture are the main drivers for creating a distinctive and coherent place. There is in our view real value in getting the landscape strategy right. The complex issues involved are well understood and provide a good basis upon which to develop a more characterful, coherent and distinctive space. There is a concern about all functions being crammed into the part of the site which does not flood, and the flooded area just paved over. Materiality and detailing will be particularly important to add flavour and character to the scheme.

Given the scale of the site and its importance within Twickenham, we would like to see the scheme again before submission in order to give it our full endorsement and the Council the confidence of a positive outcome.

Yours sincerely



Noel Farrer

Director, Farrer Huxley
Chair, Richmond Design Review Panel

Panel Members

Dorian Crone	Heritage and Design Consultant
Katy Neaves	Director, Neaves Urbanism
Richard Woolf	Director, McDaniel Woolf
Kelly Green	Associate, Feilden Clegg Bradley
Vinita Dhume	Associate Director, Levitt Bernstein
Euan McGillivray	Director, Rolfe Judd

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Attendees (invited to observe)

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James Garside	Senior Planner
Marc Wolfe-Cowen	Principal Urban Design Officer
Nicolette Duckham	Senior Conservation Officer
Cllr. Gareth Roberts	
Cllr. Roger Crouch	
Cllr. Martin Elengorn	
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**Richmond
Design Review Panel
C/o Richmond Council**

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Our ref: ECS/
Your ref:
Date: 28 June 2021

Iyabo Johnson
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Dear Iyabo

**Richmond Design Review Panel: Follow – Up Review
Twickenham Riverside, London, TW1**

The Panel is grateful to you and your development team for submitting your proposal to the Richmond Design Review Panel (RDRP) on Wednesday 9 June 2021. In light of the Government restrictions following the coronavirus outbreak the Panel was not able visit the site and meet your team in person, however the Panel provided feedback in a virtual open session with the applicant present to hear the Panel's views. We therefore thank the applicant team for their follow-up presentation of the proposals of the Twickenham Riverside site. This letter will remain confidential until a formal planning application has been submitted, whereupon it will appear alongside the information submitted with the application.

The aim of the proposals is to bring the derelict and underused site back into active use, take advantage of its riverside location; improve links with the core of the town and retaining open green space. Specifically, it involves the following:

- Demolition of 1, 1A, 1B and 1C King Street, and replacement with a 'flipped' L shape 4 storey building, extending south along Water Lane, and partially to the rear of the service road, providing approximately 600m² of retail and café floorspace at ground floor level and 21 residential units above (Affordable).
- Erection of a part 4-5 storey wharf building adjacent to Wharf Lane with approximately 800m² commercial (office, pub, retail) at ground floor (and small basement) and 25 residential flats above.

- Removal of most of the car parking along the Embankment, except for some limited spaces associated to Eel Pie Island. The Embankment would become an area of open space, potentially for markets / events, and river related activities.
- A series of other open spaces to replace the Diamond Jubilee Gardens, with lawns, seating terraces, playspace and a pétanque area. These are both at a lower level adjacent to the river, at a higher level (in response to flooding). Access is achieved via ramps and steps ensuring access for all.
- Changes in ground levels prevents linking the service road to Water Lane, and subsequently, the Embankment would be used during limited hours for servicing and deliveries. Water and Wharf Lane are proposed to become two-way for all other vehicles. Alterations will be made to parking bays along Water and Wharf Lane.

The Twickenham Riverside is centrally located within Twickenham Town Centre and encompasses the whole of the riverside area between Water and Wharf Lanes. It represents a fundamental piece of urban fabric and public realm for Twickenham. The Panel is therefore grateful for the commitment shown by the applicant and design teams to the design review process and the progress the design has made since the project was first presented in April 2021 and commends the efforts and progress made in addressing the Panel's feedback.

The Panel's detailed comments are set out below:

Concept Design

In the initial design review the Panel acknowledged that Richmond Council commissioned the Royal Institute of British Architects (RIBA) to deliver a design competition in 2019 where Hopkins Architects, and their concept design, were chosen as winner by a Design Panel established for the competition. The ambition of the design competition to reactivate this underused and derelict area and provide an active connection between King Street and the River Thames is key to the concept proposed and very much supported.

The Panel welcomes the Heritage and Townscape Assessment provided and is pleased this analysis helps underpinning how the heritage perspective adopted in the scheme provides a positive contribution to this part of town and bringing back life to these spaces.

We recognise that the requirements imposed by the Environment Agency has brought about the need to make substantial changes to the competition winning scheme and we applaud the design team for the way they have responded to address these challenges.

Overall, the Panel acknowledges that the design team have addressed the issues raised in the previous review and we think the scheme has made good progress. We are generally pleased with the revisions to the Wharf Lane building though feel there is an opportunity to improve the active frontage to the street. The further development of the boat storage area will undoubtedly help activate this corner of the site.

We also welcome the further development of the Water Lane building but still feel there is an opportunity to finesse the design of the King Street frontage to the building to reinforce the way it announces the way to the river.

We welcome the further development in the landscape design notably the improved clarity around pedestrian desire lines and the fact there is a more generous public realm arrangement based upon an active and vibrant space. We also feel the strengthening of the tree planting to the river frontage will frame the approaches to the site from the river.

Public Realm and Landscaping

The Panel is pleased with the more generous approach towards the public realm. We support moving the existing Black Poplar tree with the commemorative plaque to a more central location to become a focal point, framing and emphasising the trees around the pétanque courts, accentuating the entrance on Wharf Lane and getting more clarity around pedestrian desire lines. These are all very welcome improvements. However,

- The Panel raises concern about the ambition of lifting and replanting mature trees as this is often a very complicated endeavour and trees may not survive this upheaval. Nevertheless, we think creating a focal point around the Black Poplar tree where pedestrian links from Wharf Lane, Water Lane and the river walk converge is positive. We suggest strengthening its role by adding seating around the tree.
- In relation to the improved clarity around pedestrian desire lines, as direct and legible routes across the site, we feel visitors have more of a choice how to approach this, either up to the grassed area and onto Wharf Lane or through the Town Square and along the riverside.
- The lockable boat storage built against the flood retention wall surrounding the Wharf Lane building and the relocation of the floating pontoon immediately opposite helps activate the space and provides an interesting outlook for people on the extended terrace above. Consider the journey along the river through the Town Square, what is pulling pedestrians around the corner into Wharf Lane? Could this western edge be animated more especially when events or boating are not taking place?
- Furthermore, we suggest considering whether the main pedestrian link should be along Wharf Lane instead of through the centre of the site, particularly if there is an active frontage at ground floor level. Is there scope for a concession outlet that could further strengthen it? We think this would take pressure off the pedestrian desire lines.
- Making more of the entrance into Diamond Jubilee Gardens from Wharf Lane is positive however this is screened off by planting and the accessible parking bay creates an unwelcome pinch point. Could the bay be put on the other side of the road? We think this entrance should be clearer and designed in a more confident way, introducing the legibility of the spaces below.
- We are not convinced about the pedestrian gates at the end of the service area along the north of the site and would prefer to have bollards instead so as to make people feel more welcome. Equally we think the storage shed next to the gate should not be in the park setting, but rather integrated into the building. If this is not possible, then we think this should look like a pavilion.
- We welcome the improvements done to Water Lane, however we suggest introducing more definition and increase the planting at higher level so the seating backs onto planting. Perhaps introducing more of the river landscape typology would strengthen the link to King Street.
- Retaining the existing Oak tree at the top of Water Lane and making more of a welcoming public space around it is positive, however the junction needs to be looked at in far more detail. In our view it is not just the new architecture that has to respond, but King Street, Water Lane and Church Street each have a different character that needs to be carefully reflected in the design of that space. Perhaps the space could be enlarged, and the Oak tree further celebrated.
- There is some concern around legibility between the Thames Path, on the southern side of the river, through Eel Island and into the site. Pedestrians might cut through the grass to reach Wharf Lane as no clear direct route is showing.

- Introducing a floating habitat along the edge of the river is a very welcome addition, both visually for it will attract wildlife, and as a way of increasing the bio-diversity net gain of the scheme. We think though more should be done to increase the urban greening factor of the site and suggest aiming at achieving 0.4 target.
- We are pleased about extending the existing raised tree planters for seating, and about the strategy of retaining as many high-quality existing trees as possible throughout the site. Overall, we think though the landscaping could be thickened out adding more trees and planting, also along the river. We recommend tree types introduced need to reflect the environment, resist flooding, and provide large canopies for shading.
- The number of cycle spaces need to be enough to accommodate the number of visitors and suggest looking into additional racks, which may also act as a way of enticing people to cycle more.

Architecture

The Panel appreciates the works done on the architecture of the buildings, particularly around the Wharf Lane building and adjacent pavilion. We feel many of the issues raised in the first design review have been addressed and in case of the boat storage successfully developed further. We are however not convinced about the expression of the Water Lane building and Panel members feel this could be finessed further.

Water Lane Building

- As mentioned in the first design review, bringing the industrial river aesthetic into King Street is part of the concept design and is supported. However, the frontage onto King Street is not yet fully resolved and further finessing of the details is encouraged.
- We think there is a major responsibility at the junction of King Street, Water Lane and Church Street, how the building presents itself and makes a positive addition, respectful of the historic setting is key.
- At present the singularity of the concept is modified by subtle changes in elevation details marking a transition from the river end towards the historic setting of King Street. The challenge we feel is to resolve the tensions in the King Street façade particularly to the upper floors and consider the materiality.
- On the Water Lane and river elevations, we encourage the team to explore whether architectural features such as signage and awnings could help to give shade and shelter to people sitting outside the proposed café. We feel it is helpful to consider this now to anticipate potential changes by tenants to ensure these features are integrated with the architecture rather than appear as 'add-ons' which could undermine the design quality.

Wharf Lane Building

- We feel the east elevation of the Wharf Lane building is much better resolved, and we are pleased that the courtyard space has been reconfigured and better utilised as an entrance to the pavilion. Consider relocating the kitchen from the ground floor to the basement. This would help free up space and better activate the façade along Wharf Lane, particularly if a concession could be incorporated creating a better pedestrian experience.

- Consider perhaps providing deeper balconies by setting them partly into the building for the two bed units on the river elevation. This would help enliven the façade allowing for a slightly different treatment with possibly part projecting and part inset balconies. It would be a missed opportunity if residents could not be able to fully enjoy their private amenity.
- Could the roof space of the single storey pavilion be opened up in a mezzanine to generate interest?
- In terms of materiality, we are not fully convinced about the combination of brick and concrete and question if whether terracotta could be considered.

Boat Storage

- We welcome the work done around refining and formalising the boat storage space. We think it will provide a greater level of activity around this part of the site and enliven the river frontage. Its appearance should not be just utilitarian. Could it be more playful and still provide interest when events or boating are not on? We suggest exploring colours, materiality, or even introducing lighting or art.
- In terms of materials, perhaps choosing something bolder and more industrial like steel or Corten could be a nice addition to the river atmosphere.
- We discussed whether there is an opportunity for a mobile concession in the southwest corner to activate it more. Whilst we understand this is perhaps not possible due to Environment Agency restrictions, we think this should still be considered in the ongoing conversation between the Local Planning Authority and the Environment Agency.

Moving Forward

The Panel is pleased to see how the proposal has developed yet fulfilling the inspiration and joy of the winning scheme. We think it will become a successful addition to Twickenham's river front. The site is very constrained and there certainly are technical issues to overcome, but we are confident the team will be able to put in the extra effort to address the issues raised above, particularly around the King Street elevation and how it wraps around the corner into Water Lane. As a number of options were discussed, the Panel agreed that the approaches were legitimate architectural solutions, however we insisted that quality should be the key driver. In our view, to ensure the success of the scheme and best represent the location and importance of the site, it is essential to keep quality at the forefront of every decision, be it architectural, materiality, level of details or landscaping and recommend this be further developed in the continuous conversation with the Council.

Yours sincerely



Noel Farrer
Director, Farrer Huxley
Chair, Richmond Design Review Panel

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Katy Neaves	Director, Neaves Urbanism
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