1.0 INTRODUCTION

The purpose of the Brief is to guide the redevelopment of this large site, shown on Plan 1, which is part of Brunel University. The University is rationalising its sites, leaving the Twickenham campus surplus to requirements. This will provide income for investment in educational provision elsewhere in West London. Initially, the University intends to concentrate academic activities on the northern part of the site. It aims to release the southern part for development from Summer 2003, and the northern part by Summer 2005. The brief describes UDP designations and their implications for this site, the preferred land use mix, transport and parking considerations, and design and landscape requirements.

The Council would like a mixed-use scheme including housing and open space with an element of community, education, and employment use to be retained on the site. The design of development will be critical on this site which is in a conservation area within an attractive residential area, very close to the River Thames. Historic buildings and a large number of important trees must be incorporated into the scheme. The large size of this site provides a unique opportunity to incorporate the principles of sustainable development into the scheme.

2.0 POLICY

2.1.0 Regional Planning Guidance

2.1.1 Regional Planning Guidance for the South East (RPG 9) 2001, gives great emphasis to the need for sustainable patterns of activity, use of resources and transport. Another key principle is that sufficient housing, including affordable housing, should be provided for all that need to live and work in the region.

2.1.2 This site is partly within the Thames Policy Area, and its proximity to the River Thames is a very important consideration. Strategic Guidance for London Planning Authorities (RPG 3) and River Thames (RPG 3B/9B) describes the importance of the character of each reach and states that the design of new development on riverside sites should take account of this special character. The guidance also requires the production of a design statement as part of the planning application for such sites. This would apply to the whole of this site. (Paras 3.11-3.25 of RPG 3B/9B). The London Plan, draft version, released in June 2002, will eventually supersede existing guidance within RPG 3.

2.2 Unitary Development Plan designations

2.2.1 The London Borough of Richmond upon Thames Unitary Development Plan 1996 (UDP) is currently undergoing a review and the Inspector’s Report has been published. The proposed modifications will be placed on deposit in Autumn 2002.

2.2.2 UDP Review designations relating to the site are listed below;
ENV 4 Views and Vistas (within views from Richmond Lock and Twickenham Bridge)
ENV 12 Area poorly provided with public open space
ENV 26 Thames Policy Area (part including Gordon House and Geoffrey Knight)
BLT 2 Conservation Area
BLT 3 Listed Buildings (Gordon House Grade 2*, Gordon House Stable Block Grade 2)
BLT 4 Buildings of Townscape Merit (Violet Needham Chapel)
BLT 7 Archaeological sites
BLT 8 Evaluation of archaeological sites
BLT 9 Development of archaeological sites

The site adjoins Metropolitan Open Land on the River Thames and riverside and policy ENV 1: Metropolitan Open Land will therefore apply with reference to the sentence in the policy covering development on land adjoining MOL. Other UDP policies relevant to the site will be referred to below.

2.3 Supplementary Planning Guidance

2.3.1 The site is included within the St Margaret's Estate Conservation Area Study, which contains an appraisal of the special interest of the conservation area; this should be taken into account in the design and layout of development.

2.3.2 The site lies within the Thames Landscape Strategy area, which covers the riverside from Hampton to Kew, and which contains relevant general policies for the Thames from Hampton to Kew, and specific policies for this reach of the Thames.

3.0 THE PREFERRED LAND USE MIX

3.1 Residential

3.1.1 Residential use is acceptable on this site. Densities should take into account UDP policies. The mix of private sector residential units on the site will need to be negotiated as part of any application but should, include small (i.e. 1-bed) units, in accordance with Policy HSG 11.

3.1.2 The proportion of affordable housing provided should be at an appropriate level, currently 40% of the total housing units to conform to UDP affordable housing policy. Subject to the agreement of an Interim Policy by the Council on 30 September 2002, 30% should be social rented housing, and 10% should be key worker/shared ownership housing. Evidence will need to be provided to demonstrate affordability. Affordable housing should be reflected in the floor-space as well as in the number of units to conform to UDP policy. The social rented housing should be predominantly 2-bedroom units (preferably in the form of houses), with a limited number of 3 and 4-bedroom houses and a very few 1-bedroom units.

3.1.3 In accordance with Policy HSG 8, 10% of the total number of housing units should be designed for, or capable of easy adaptation to, wheelchair housing which would enable a wheelchair user to live independently.
Education, Community, and Employment Uses. As this is an extensive site, currently wholly in educational use, the Council would like to retain some community and education use on the site. There are no specific requirements for educational establishments for the Local Education Authority, but other suitable users should be sought to make use of existing purpose-built accommodation. There should be liaison with the appropriate authorities over the provision of early years facilities such as nursery schools and day care.

3.2.2 In addition to the above, the needs of new residents for education and medical facilities will need to be considered, the latter in consultation with the Richmond & Twickenham NHS Primary Care Trust (PCT). The PCT has indicated that it would find it difficult to provide sufficient GPs in appropriate locations to serve an increase in the site population, and sees the re-development as an opportunity to provide high quality health care from purpose-built health care facilities on the site. With respect to educational facilities, financial contributions will be required. It would not be appropriate to have a major increase in overall employment levels on the site as it is located away from the main town centres and has relatively poor links to public transport. Historically the site has provided employment opportunities in the University and some replacement employment should be sought within the redevelopment.

3.2.3 The suitability of new uses for Gordon House will primarily be determined by their effect on the character of the listed building. A hotel use may be appropriate in view of the importance of retaining the character and integrity of the principal rooms, and would also have benefits in providing public access and some local employment, subject to satisfactory access and parking provision.

3.3 Open Space, Leisure Facilities, and River Related Uses

As this is in an area poorly provided with easily accessible public open space, the developer is expected to provide open space to meet the needs of new residents, designed to be used by the general public as well. The open space should link directly to the existing riverside open space alongside the towpath, with the aim of enabling more people to enjoy the riverside. In practice, as the development of the site will be constrained by the need to preserve the large trees and parkland character, and to respect existing historic buildings and features, it should not be difficult to provide such space within the development. Consideration should be given to providing a pontoon for temporary visitor mooring to encourage use of the river. Children’s play space standards must also be met, and such areas suitably laid out.

4.0 TRANSPORT AND PARKING

4.1 The Council supports a choice of means of transport, and encourages the use of public transport, cycling and walking as alternatives to the private car. UDP Review Policy TRN 2 refers to transport and new developments in detail.

4.2 Vehicle access and egress will need to be at a number of locations, and these will need to be subject to detailed study to minimise impact on existing residential areas. St Margaret’s Road would be a good location for a pedestrian...
and cycle entrance (particularly if bus-stops are placed nearby) but would not be suitable for the main vehicle access point to the site. If Railshead Road were to be used for vehicle access, improvements would be necessary including possible relocation of car parking.

4.3 The site layout should be designed so that cars do not visually dominate the townscape or landscape, and accessibility by walking or cycling is maximised. Sufficient parking should be provided to minimise the risk of overflow parking taking place in adjoining residential roads. A contribution may be required towards the cost of traffic management measures in adjoining residential roads, which may be affected by the development. There will also be a requirement for cycle parking, which should be located to maximise convenience and security.

4.4 Walking and cycle routes should be provided through the site, and these should be well linked to existing walking and cycling routes in the vicinity, including the towpath, which on this reach is used for both walking and cycling. A particularly important potential link is East / West across the site from St Margaret’s Road, preferably via St Margaret’s Lodge and the avenue of trees described in para 6.3.

4.5 The site is less than 1 km (10 minutes walk) to St Margaret’s Station, but part of the route is along an unpleasantly narrow pavement. The opportunity should be taken to investigate widening the narrow footway by moving back a short section of the boundary wall, and replacing some short sections with railings to improve views, subject to consideration of the wall’s historic and architectural interest. It is only 1.5 km to Richmond town centre, station and tube line via Richmond lock, and use of this route could also be encouraged.

4.6 Bus use could be encouraged by the provision of an accessible bus-stop on each side of St Margaret’s Road together with a pedestrian/cycle crossing near to St Margaret’s Lodge. Developers are expected to discuss with the appropriate bus companies the improvement of service frequency and waiting facilities, and contribution towards existing or possible new routes (e.g. to Twickenham centre and rail station) to serve this site. The bus operator has expressed interest in a bus stand or turning area within the site, which would allow some services currently terminating at Richmond to extend to St Margaret’s; this opportunity should be explored.

4.7 The developer will be required to enter into a Section 106 agreement in relation to these transport requirements. Some of the issues that may arise and need to be considered further in the TIA are

- widening of the footpath and the addition of bus stops and pedestrian/cycle crossing on St Margaret’s Road;
- improvement of cycle and pedestrian routes on and adjacent to the site;
- minimising the possibility of rat running to the A316;
- potential for a car share club.
- The opportunity for some parking to be provided inside the site for residents at Thistleworth Marina, in order to carry out environmental improvements in Railshead Rd by reducing parking there.

- Access by river for some construction traffic

**5.0 RESOURCE CONSERVATION**

This large site would provide an ideal opportunity for an imaginative scheme incorporating principles of design and construction which minimise energy use and pollution in the construction, operation and maintenance of buildings, and the Council is keen to encourage such an approach. This would be in line with regional guidance (RPG 9) and the UDP Review.

5.1 As well as encouraging a mix of land uses, a mix of housing types and tenures and a location and design to encourage less polluting modes of transport, the RPG sets out in detail aspects of sustainable design to be considered (para 5.9).

5.2 UDP policy BLT 31 (Energy and Resource Conservation) was supported by the UDP Inspector who recommended modifications including that the Council may require applications be supported by whole life energy audits of buildings, and that the Council will aim to secure a target of 50% recycled aggregates in all developments.

5.3 It is recommended that those concerned with the development of this important site; developers, architects and Registered Social Landlords, should be familiar with and sympathetic to the principles of low energy and low pollution design and materials.

**6.0 DESIGN AND LAYOUT CONSIDERATIONS**

6.1 Existing guidance

6.1.1 The UDP provides general guidance on design principles in policy BLT 11. Attention is drawn particularly to the factors listed (a) to (i) in paragraph 2.39 of BLT 11, described in detail in paragraphs 6.44 – 6.51, which will be taken into account in considering planning applications, and to the Council’s objectives in relation to ecological design principles in paragraph 6.41 of BLT 11.

6.1.2 The Council will take into account the government’s guidance in ‘By Design’ (DETR/CABE, May 200), in particular the ‘Objectives of Urban Design’ described in Section 2 Page 15 of this document.

6.2 General design principles

6.2.1 The site has a strong relationship with the river and the variety of residential areas surrounding it. Views into the site at present are restricted to entry points, and are generally limited by high brick walls, some stretches of which have considerable historic character. Distant views of Gordon House are important in the river landscape. Within the site, which was originally two estates, the listed buildings and surviving valuable treescapes form part of a complex mixture of
education buildings of different functions, periods and styles, and areas of open recreational land, which appear uncoordinated and leave some areas with no clear function or focus.

6.2.2 It is expected that any re-development of the site, as well as retaining statutorily listed buildings, BTMs, other buildings important to the character of the conservation area, identified trees and areas of landscape and nature conservation importance which are assets to the site, will establish a clear urban design and landscape strategy for the site, which should also be set out in written form. The Council expects a high standard of design and materials and discourages designs and layouts, which reduce the impact of existing historic buildings by imitation of their architectural character and detail.

6.2.3 It should be noted that English Heritage is currently reviewing buildings on the site with a view to identifying additional buildings for statutory listing.

6.2.4 The site forms a significant part of the St Margaret’s Estate Conservation Area. The character and special interest of the conservation area, as described in the appraisal in the Council’s Conservation Area Study, should guide the form of development on the site, so that the principles of an organic layout incorporating new or existing natural features, and a generous proportion of open space and garden to built development, are retained, particularly at the southern end of the site.

6.2.5 Development will need to consider the amenity of residents in adjoining areas, (including those living in houseboats at Thistleworth Marina), particularly in relation to heights of buildings, traffic and parking.

6.3 Design objectives

6.3.1 Historic buildings

- Improvement and enhancement of Gordon House and identified outbuildings;

- Retention of the majority of the open area to the south/south-west of Gordon House as an open setting for the house, taking into account historical precedent as shown on 19th century maps of the site;

- The design of new buildings to the south/south-west of Gordon House must acknowledge its listed building status and historic setting and be limited to three storeys (see para 6.3.2);

- Retention and enhancement of the following buildings in addition to the statutorily listed buildings: St Margaret’s Lodge and adjacent gateway and piers; Violet Needham Church; the ‘Orangery’ (part of the Sheridan building); and the Chapel adjacent to Gordon House. Although not on the site, which is, the subject of this Brief, Clifton Lodge is also in University ownership and will need to be retained and restored.

- Possible moving back of short section of the wall on the St Margaret’s Road boundary to widen footway, and selective replacement of wall with railings in
appropriate locations on the riverside and St Margaret’s Road as shown on
the Guideline plan, to improve conditions for pedestrians, security, and views
into and out of the site;

6.3.2 Heights and massing of development

The Council is seeking to protect the setting of the Grade 2* listed Gordon House
from development which might challenge its distinction as a landmark in the river
landscape and its relationship with its parkland setting. It is therefore appropriate
that the height of development, which will be seen in conjunction with Gordon
House, should be restricted, to respect its architectural and historic interest and
landmark role. Any development in close proximity to Gordon House should
therefore be to a maximum of three storeys. Further away from Gordon House,
or where the development proposed would not be seen from a public viewpoint in
conjunction with Gordon House, the appropriateness of buildings higher than
three storeys would be considered on their merits, taking into account the context
of Gordon House in its parkland setting, the scale and character of the riverside
landscape, and the character of the conservation area. Views from the Old Deer
Park and the towpaths will be particularly important in this respect.
Consideration should be given to setting back buildings behind open space on
the river side of the site in order to allow Gordon House to retain its dominance
and its relationship with a relatively green setting.

6.3 Landscape

6.4.1 There are many important trees on the site dating back to when Gordon House
and St Margaret’s House were separate sites, and these give the site a character
of buildings set in a landscape-dominated area. A tree survey has been carried
out to identify key trees and groups of trees, which must be retained. A number
of these trees are key landmark trees, which are very important to the character
of the site.

6.4.2 The main groups of trees play an important role in defining landscape spaces
within the site. An avenue of lime trees exists along the previous property
boundary between Gordon House and St Margaret’s House. While it is
recognised that some of its trees are in poor condition, the lime avenue should
be retained and improved. Where necessary replanting should take place, to
form the basis of a public East West pedestrian link across the site from St
Margaret’s Road to the riverside, including opening the riverside boundary at this
point to link with the towpath. Consideration should also be given to possible
views across the river, which align with the avenue. Pedestrian permeability
through the site should be maximised and gated entrances should be avoided.
The wall running parallel to the lime avenue on the boundary of the two former
properties, as shown on the Guidelines plan, should be retained and restored.

6.4.3 Open green areas - as referred to in para 3.3 above - should preferably adjoin
and relate to the riverside and, if located within the site, to existing tree groups
and retained buildings to provide a setting for these. The Council’s preferred
open space locations are shown on the Guidelines plan.
6.4.4 With the exception of the landmark tower of Gordon House, visible over a long distance, the site is visually cut off from the river. Use of railings at some locations would improve views in and out of the site and link the landscape within the site better to the riverside, and to the landscape beyond the river - the Old Deer Park opposite the site is Grade 1 on English Heritage’s Register of Parks & Gardens of Historic Interest.

6.4.5 Some of the walls to the inland boundaries to the site are important to the townscape and landscape, particularly the decorative wall to the southern boundary of the site, which relates to those in St. Margaret’s Estate. There may be an opportunity, subject to discussion with English Heritage, to reduce or set back part of the wall to St Margaret’s Road at the northern end of the site to allow pavement widening and views into the site.

6.4.6 Future planting should reinforce the existing landscape character and settings.

6.5 Nature Conservation

Developers should take account of the existing and potential nature conservation value of this area and enhance this value wherever possible by informal landscaping with locally native species. The link to the River Thames, identified as an ecological corridor, could be enhanced with suitable planting.

7.0 ARCHAEOLOGY

It is important that the archaeological interest of the site is protected, in accordance with government advice in PPG16. The site is not within an area of archaeological potential as identified in the Unitary Development Plan constraints map, but in view of the potential for archaeological remains to be found outside such areas, the Council may decide on receipt of a planning application to require an archaeological desk-based assessment to be carried out, followed by limited fieldwork evaluation before an application is determined.

8.0 ENVIRONMENTAL IMPACT ASSESSMENT [EIA]

Given the nature of the site and the potential scale of development, the Council will give careful attention to whether an EIA is required. Prior to the submission of a planning application, if an EIA is required the Council will provide a scoping opinion setting out what information needs to be included in the environmental statement.

9.0 MATERIAL TO SUPPORT A PLANNING APPLICATION

In support of a planning application, the Council will require the following studies:

- An Environmental Impact Assessment if the Council decides the scale and nature of the development requires it (see paragraph 8.0 above);

- An urban design statement demonstrating how the development will integrate and link with the conservation area and its surroundings. In particular this study should demonstrate how the development relates to the existing listed
buildings and buildings of townscape merit on the site, and to this reach of the River Thames and its landscape setting;

- A planning policy statement;

- A full transport assessment, including the potential impact of traffic on the surrounding area and the contributions of public transport, cycling and walking to residents travel needs;

- Evidence that shared ownership and key worker housing will meet affordability requirements;

- Potential effects on flood levels, taking into account the requirements of the Environment Agency;

- Effect on existing trees and nature conservation;

- An appraisal of existing buildings and their potential for re-use.

London Borough of Richmond upon Thames
Policy and Design Section
August 2002