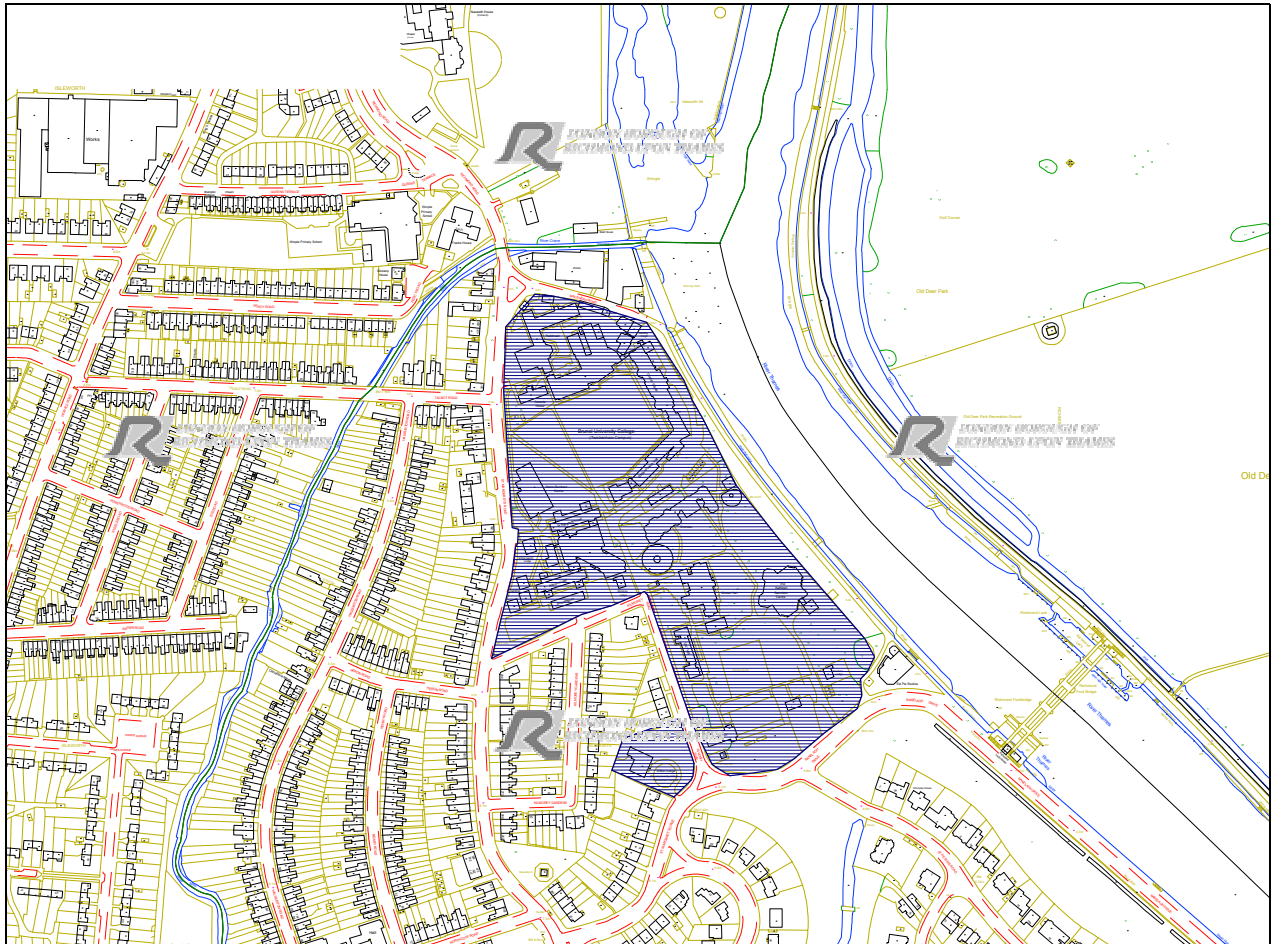


**PLANNING COMMITTEE - 10 JULY 2003**

**02/3734/FUL  
BRUNEL UNIVERSITY  
300 ST MARGARETS ROAD  
TWICKENHAM**

**ST MARGARETS AND NORTH TWICKENHAM WARD  
Contact Officer:  
R Summers**



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**Proposal:** Redevelopment and refurbishment of Brunel University site to provide a mixed use scheme comprising 168 new build dwellings incorporating 69 affordable units, 28 private flats and 71 private houses. The conversion of Gordon House and stables into three residential units and garaging. The conversion of St Margarets Lodge into one residential unit. The incorporation of the Orangery into residential use. The use of Clifton Lodge and Violet Needham Chapel for educational and nursery purposes. The provision of a new healthcare centre. The use of Gordon House Chapel for office purposes. The alteration and creation of new vehicular/pedestrian/cycle access and car parking

**Applicant:** Dalton Warner Davis for Octagon (Richmond) Limited and Brunel University

**Application received:** 12 December 2002

**Main development plan policies:**

UDP ENV 1, 2, 3, 6, 7, 8, 10, 11, 12, 13, 14, 17, 18, 19, 20, 22, 23, 24, 25, 33, 43 and 47, EMP 5, HEP 3, 7 and 9, HSG 1, 4, 6, 7, 8, 11, 12, 13, 17 and 18, REC 2 and 7, RIV 1, 2, 3, 12, 13 and 14, STG 2, 5,

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6 and 11, TRN 6, 8, 9, 22 and 23; UDP - First Review BLT 2, 3, 4, 5, 7, 11, 14, 15, 16, 17, 26 and 31, CCE 6, 8, 10 and 24, EMP 4, ENV 1, 4, 5, 9, 10, 12, 19, 20, 21, 24, 26, 27, 32, 33, 34, 35 and 37, HSG 1, 4, 6, 7, 8, 11, 12, 13, 17 and 18, IMP 1, 3 and 4, STG 2, 3, 6, 7 and 11, TRN 1, 2, 4, 9, 12 and 13; RPG 3B/9B, London Plan, Thames Landscape Strategy, Planning Brief, Arcadia, St Margarets Conservation Area Study, Listed Building Grade II\*, Conflict with Development plan, BTM, Adj. Metropolitan Open Land, Thames Policy Area, Area of Special Character

**Present use:** University campus

**Site:** The application site is approximately 5.7ha in size, including Clifton Lodge in the south west corner opposite the main University campus, across Kilmorey Road.

The Thames runs along the east side of the site, separated by the public footpath/cycle route known as Isleworth promenade, with Old Deer Park on the other side of the river. Railshead Road, a narrow public highway, contains the site to the north side and this road also serves two employment properties, one of which is nearing completion for a mixed use development, and Thistleworth Marina which contains 27 house boats. It is also the pedestrian/cycle route to the promenade.

St Margarets Road acts as the west boundary with the L-shaped Kilmorey Road to the south west. Finally, Ranelagh Drive is to the south linking Kilmorey Road and St Margarets Drive to the towpath and beyond.

The site is approximately 1 km from St Margarets centre, 1.5 km to Richmond, across Richmond half lock, and 2 km to Twickenham. Buses run past the site to and from Richmond/Hounslow.

The campus lies in the St Margarets Conservation Area and contains Gordon House, a Grade II\* Listed Building facing the river with its former stable block and chapel, also both listed buildings, as is much of the boundary wall to the north, west, south and south west. High walls including along the towpath surround the site and only occasional glimpsed views into and across the site are possible from public viewing points.

There are long views of Gordon House in particular from both towpaths and Richmond Half Lock and Twickenham Road Bridge although the view from Old Deer Park is less clear, even in the winter months, due to the heavy tree screen on the Surrey bank.

St Margarets Lodge, a gatehouse on St Margarets Road, Violet Needham Chapel in the southwest corner of the site and Clifton Lodge opposite the Chapel are all Buildings of Townscape Merit (BTM). Finally the Orangery in the centre of the site near the Thames frontage is also a BTM.

The site has a significant covering of major trees which partly relate to the landscape developed when the site contained three substantial historic houses of which Gordon House is the only survivor.

There is a multitude of other buildings on the site mainly developed over the last 100 years for educational purposes and they vary in size, height and design, up to four storeys in height, but none are considered to be as important as those identified above. They are disposed around the campus, containing a recreation area of open space to the west of Gordon House, and more open land on the southern part particularly where it is close to the river and at the south end of the campus.

The site has been used for educational activities for many decades with Brunel taking over the land some seven years ago. The university has decided to consolidate and rationalise on two other campuses they own and thus St Margarets is surplus to requirements. The intention is to withdraw from

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the southern part of the site this year and the northern part by the middle of 2005. The proposal would thus be carried out in two stages as the campus is vacated with completion of the planning application by 2008.

### **Policy framework:**

#### **Strategic policy**

There are several documents relevant to this site and the proposal in the consideration of the scheme and the construction of this report. These include 'A Better Quality of Life, a Strategy for Sustainable Development for the UK' HM Government 1999, which outlines the Government policy on the environment. Several of the PPGs set out national policy on specific subjects, as well as PPG 1 which identifies general principles of the planning system. Those relevant, in particular to this application, are PPG 3 Housing, PPG 9 Nature Conservation, PPG 13 Transport, PPG 15 Historic Environment, PPG 16 Archaeology and PPG 25 Flooding.

PPG 15 in particular emphasises the 'statutory requirement that authorities should have special regard to the desirability of preserving any listed building or its setting, or any features of special architectural or historic interest which it possesses, and should pay special attention to the desirability of preserving or enhancing the character or appearance of any conservation area in exercising their Development Control functions.'

RPG 3 and RPG 3B/9B- Strategic Advice for London and the Thames in particular are also relevant in that the latter introduced the concept of the Thames Policy Area that is of significance given the site's location. Thames Policy Area requires that policies should be included in UDPs to protect the special character of the Thames and that Local Planning Authorities should prepare detailed appraisals of their stretches of the river and its environs. Thames Policy Area has been incorporated in to the UDP Review and Gordon House is within this area.

RPG 9-Guidance for the SE is being superseded by the Mayor's London Plan which builds upon the concept of viewing the Thames as a special resource. A 'Blue Ribbon' network is being developed to ensure new development contributes to the character of the river..... and achieves high quality of urban design, especially improving public access to the river.

#### **Local policy**

Following Boundary changes approved by Government in 1994 the campus and surrounding land up to the Crane river came into the administrative control of Richmond.

The UDP 1996 is the adopted plan until the current UDP First Review is formally adopted although the latter plan can be given considerable weight as it has been through several stages towards adoption.

The site is identified as Proposal T32 in the UDP for the 'Consolidation and improvement of the University, environmental improvements, open space'.

The justification is to meet the needs of the University noting that the site and Conservation area status plus the river location which is designated Metropolitan Open Land and an Area of Special Character would be influential in the design of new buildings. Any development would need to protect residential amenity, to protect and enhance the riverside, the townscape and landscapes of the site, to take account of traffic conditions and to seek to improve provision for public transport and cyclists.

The UDP First Review has been amended to take into account Brunels decision to relocate from the site. A new Proposal, T29, has been drawn up which states that 'Redevelopment for a mixed use

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scheme, including housing, some community/education/employment use, retention of listed buildings and some open space, improved links through the site’.

The justification reiterates the importance of development respecting the conservation area and the importance of open land adjacent to the campus which has Metropolitan Open Land and Thames Policy Area (supersedes Area of Special Character status) designations. It also reiterates the need to consider residents’ amenities, to protect and enhance the riverside, to enhance the townscape and landscapes of the site, to take account of traffic conditions and to seek to improve provision for public transport, cyclist and pedestrians.

The relevant UDP policies are listed at the beginning of this report and are discussed in the body of this document under the appropriate sections of Professional Comments set out below.

### Supplementary planning guidance

**The Thames Landscape Strategy** has been adopted for DC purposes and contains general strategies, policy proposals and project proposals for the stretch of river covered by it. In the Isleworth Reach in which the application site lies there is one particular policy proposal, namely

Policy 10.4 to conserve and enhance nature conservation interest of the river and its corridor.

Two Project Policies apply to the campus, namely

Project 10.9 to reinstate the short stretch of riverside cast-iron railings missing opposite the Eel Pie Studios at the end of Ranelagh Drive and

Project 10.10 to remove the ash and sycamore scrub obscuring the views from Gordon House riverside park i.e. Isleworth Promenade.

The **Arcadia** project, part Lottery funded, seeks to implement the Thames Landscape Strategy on this section of the river and its environs.

**The St Margaret’s Estate Conservation Area Study** published in 2001. There are a number of references to the site which forms a substantial part of the area covered by the study. Some of the key points are:

‘The grounds of the University and the river form a distinct extension to the open landscape of the river and its natural setting. The scale and quality of Gordon House equally serves to reinforce the essentially C18 landscape.’

‘There is an abundance of greenery from mature trees, hedges and spectacular gardens within the Estate which are a great asset to the conservation area....’

‘The university grounds provide a sense of spaciousness, so indicative of the conservation area, and along with the greenery of St Margarets estate, provides a back drop of open space when viewed from the Old Deer Park’

Key strengths of the area are identified as:-

1. Strong boundary definitions.
2. Grandiose villas within spacious grounds.
3. Plentiful space around and between properties with views of the communal gardens beyond.

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4. Mature gardens.
5. Individual designs within an organized layout.
6. Deliberate mixture of architectural styles.

One of the key problems noted in the study is that the footpath treatment along the Isleworth promenade is poor and due to excessive tree growth along the path views are obstructed to and from it.

**The Brunel University Planning Brief** was produced by the Council last year following the university's decision to relocate from the site. The Brief is intended to guide the development of the site and was the subject of extensive public consultation, including a public meeting, and was adopted for Development Control purposes by the Council last year. As such it has material weight in accordance with PPG 1 and 12. It is at appendix A to this report.

In summary it identifies some of the key national, regional and local policies and supplementary guidance. Some of the key guiding factors are:-

1. Residential is acceptable subject to meeting density & HSG policies including 40% affordable units/floor space divided into 30% rent and 10% key-worker/shared ownership.
2. Some community and education use retained but no specific requirement for a school for the Local Education Authority.
3. Doctors surgery suggested.
4. Education supplement required to provide for new residents.
5. Some limited employment suggested but not an appropriate site for major employment generators due to distance from town centre and relatively poor public transport.
6. Possible hotel use for Gordon House.
7. Area is poorly provided with easily accessible public open space therefore need to provide spaces for new residents and general public which should link directly to the riverside.
8. Need to provide children's play space with appropriate equipment.
9. Brief supports a choice of means of transport.
10. Vehicle access points suggested and pedestrian access off St Margarets Road.
11. Avoid over flow parking and prevent the car dominating the site.
12. Promote walking/cycling though the site.
13. Investigate pavement widening along St Margarets Road.
14. Encourage bus route improvements and explore with bus operator a bus stand in the site.
15. Minimise 'rat running' to A316.
16. Provide parking in the site for Railshead Road users to enable environmental improvements to the road.
17. Use of river for construction traffic and pontoon for visitors.
18. Need to consider carefully BLT policies due to conservation area/Listed Buildings/BTMs/Trees and landscape/proximity to river and establish a clear urban design and landscape strategy.
19. Need to retain generous proportion of open space to built form particularly in the south part.
20. Need to consider impact on neighbours, including Thistleworth marina.
21. Need to protect and improve setting of Gordon House and limit new build to three storey to south/south west and not prejudice its position as a landmark building nor its relationship with its parkland setting.
22. Higher buildings may be appropriate if not impinging upon the setting of Gordon House.
23. Need to protect treescape that is a key feature of the site.
24. Maximize pedestrian permeability and avoid gated development.
25. Open spaces should adjoin the riverside.
26. Introduction of railings in lieu of some of the boundary walls will improve views into and out of the site.

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27. Seek to improve nature conservation on site and particularly with the Thames corridor.

28. Address need for archaeological assessment.

**The current proposal:** The application proposes the demolition of most of the buildings on site and parts of the boundary wall which are the subject of a separate conservation area consent application reported below, (ref: 02/3786/CAC). There is also an accompanying listed building consent application for works to the listed buildings also reported following this application (ref: 02/3735/LBC).

The proposal, as originally submitted, was mainly a residential development comprising 70 affordable units in a mixture of sizes and contained within blocks of flats, 28 one bedroom private flats and 73 private houses and four houses created from conversions of Gordon House and St Margarets Lodge. Heights vary between two storeys, mainly three storeys, rising to four storeys with substantial roof accommodation, particularly at the north end of the site.

The scheme can usefully be broken down into two parts to aid explanation and consideration, particularly as the proposal is to be implemented in two parts over five years. The two areas are set out in appendix B.

**The southern site:** These are primarily large terraced, detached and semi-detached houses set in reasonably sized gardens retaining many of the trees which give the site its distinctiveness.

The height, mass and design concept for this part of the proposal seeks to follow that set by the residential land to the south, St Margarets Estate, and includes a small lake feature which will be visible and accessible to residents and the general public. This seeks to build on the private water features in the pleasure grounds to the south.

The terraced houses at the southern end seek to retain a view of Violet Needham Chapel's east end without impinging on the more public views of its west and south sides. The roadway for the other houses is gently curved to reflect the more sinuous roads further south. The Orangery, a BTM near the centre of the overall site close to the riverside would be incorporated into one of the new detached houses.

The majority of the open space designed for public use is in phase one of the project adjacent to the riverside.

Vehicular access to this part of the scheme would be primarily from Ranelagh Drive by the modest widening of the existing access point, and some ramping to prevent flooding into the site. A second access would be formed for five houses, as initially submitted, off the southern arm of Kilmorey Road near to the current entry point for Lacy House, a rather dominant four-storey student accommodation block.

Finally on phase one, four houses would require access from the principle University entry/exit point on the outside of the right angled bend in Kilmorey Road.

Public pedestrian/cycle access is proposed off Ranelagh Drive via the side of the lake to the riverside as an alternative to using the current public walled footway that leads onto the promenade. (The Crime Prevention Officer has suggested that the access onto the public open space be gated but unlocked to dissuade access by intruders).

As initially submitted the plan showed the proposed open space linking to the river but replacing the current 1.8m high wall with a lower wall with railings which would maintain the physical separation of the

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current linear park with the proposed new public space, albeit with an access in the wall to the riverside from the site.

As part of this first phase the applicant is seeking uses for the Violet Needham chapel in the south west corner of the site and for Clifton Lodge which is off site but is directly related to the Brunel campus and is within the application site. These are intended for educational and nursery school purposes.

**The northern site:** Working from south to north the scheme as initially submitted proposed four No four storey blocks of flats in the location of Brondesbury and Kilmorey Halls fronting both the east/west arm of Kilmorey Road and the St Margarets Road. Boundary trees to the south were shown to be retained with those on St Margarets Road being replaced. The blocks contained 32 affordable units on the west side and 28 private units to the east.

The former would be served by 15 parking spaces off an amended entrance from Kilmorey Road, the latter by an underground car park accessed off the main road into the site utilizing the existing principle entrance.

Immediately to the north St Margarets Lodge, a BTM, would be retained and converted to a house with two additional detached houses providing a small courtyard setting. Cars would access them by the new public route through the site to the river. This route would cross the main access road, serving another underground car park for the houses further north (see below) and continue to the river on an east/west axis. It would also serve three more detached houses, and their garages, before reaching the proposed public open space. It would be just north of the Lime Walk which is suggested in the planning brief as a possible public path.

Three more houses are proposed flanking the public route.

Gordon House is to be refurbished involving the demolition of the more recent wings to the building, particularly the southern extension which also wraps around to form part of the quadrangle to the open space to the south west of the Listed Building. They would be replaced with more sympathetic additions and be converted to three houses. The Geoffrey Knight building, the former stable block, would be fundamentally overhauled with new back wall and pitched roof and used for parking and ancillary accommodation for the Gordon House properties.

A key element of the new build is the proposal to form two terraces, at three storey high, to create a partly enclosed 'square' in front of Gordon House with formal water features split by the 'cross', an hard surfaced area to be kept open when not required for occasional servicing by large vehicles.

These houses would have rusticated ground floors, two floors of brick work above and stone balustrading at cornice level concealing shallow hipped roofs seeking to reflect detailing from the main house.

Part of the wall to St Margarets Road would be removed and railings inserted to provide a vista across the water features to the west elevation of Gordon House. Currently this public view is not possible due to the high wall and other intervening buildings.

All parking for these houses would be in an underground car park served from Kilmorey Road.

Canada House would be demolished and its access onto St Margarets Road was to be closed with three houses being constructed in that area.

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A four storey building would complete the residential development taking the place of the Railshead teaching buildings which are currently three storey with flat roofs. The new build would also contain flats in the roof space in the form of dormers with pitched roofs giving a mass of building greater than a traditional four storeys. These would contain affordable units.

Adjacent to these flats a doctors surgery was originally proposed, as a replacement for the current premises in an end of terrace house in Crown Road which requires better accommodation for disabled access and to improve other services. This would be two and half storey purpose built with a lift facility.

Finally the Chapel, a Listed Building, would have other structures, which have been added to it over the years, removed and be restored and refurbished as a small office suite. A separate Listed Building Consent application is currently under consideration for these works.

Parking and access to this part of the site was initially intended to be from Railshead Road only, via an existing access point. Servicing from Railshead Road would be for most of the houses on the north part of the site including those forming the setting for Gordon House.

Parking for the affordable units on both parts of the site were at one car space per two units and four spaces were shown for the surgery.

Generally the key trees on this part of the site are shown to be retained. However, officers were concerned that some of the building and hardstanding was coming too close to the trees and this has been addressed in amendments which are reported and discussed below.

Other matters:-

1. The application has been submitted with an Environmental Impact Assessment (EIA) although this is on a 'without prejudice' basis as the applicant considers that an EIA is not necessary.

This is in the form of a document, the Environmental Statement (ES), which draws together in a systematic way an assessment of the proposal's likely significant environmental impact on the area. This aids consideration of the possible consequences of the development and how any materially harmful affects can be properly dealt with.

A series of reports on different aspects of the proposal have been included in the ES and they reflect the list of suggested reports referred to at the end of the Planning Brief, attached at appendix A. This has been the subject of public consultation as have the drawings etc.

2. It should be noted that whilst the application seeks to relate to the contents of the Planning Brief, which this Council has adopted as Supplementary Planning Guidance, the UDP 1996 effectively has the land for educational purposes, reflected in the Proposal site. As this is the adopted UDP the view is taken that this application is a departure from the Development Plan and, as it exceeds 150 residential units, it needs to be referred to the Secretary of State (SOS) for consideration if the application is to be approved.

The SOS would then assess whether, taking into account this report and all background papers, he is content with the decision and thus returns it to this Authority to issue the decision notice or he decides that the application should be 'called in' for consideration at a public inquiry.

It would be necessary for the SOS to take into account the UDP First Review which is very well advanced and that the application site has been the subject of a new Proposal and the Planning

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Brief has been the subject of extensive public consultation. This is all germane to the weight he would need to give to the change in emphasis from education to residential for the site.

### **Public and other representations:**

**The Greater London Authority** comments will be reported orally to the Committee.

**English Heritage (Conservation Area Reference)** considers the proposals acceptable in terms of the need to protect the character and appearance of the conservation area and setting of the listed buildings.

**English Heritage (Archaeology reference)** advises that on the basis of the applicants report there is no need for pre determination fieldwork but that a condition is recommended to protect any in situ remains.

**The Environment Agency** on the basis of the flood risk assessment report submitted has no objections in principle but recommends conditions to protect the site from flood risk and to avoid harm to the surrounding area.

**English Nature** notes that there is evidence of bats and recommends the developer adopts the precautionary approach in seeking a license from DEFRA. English Nature advises that the felling of mature trees be kept to a minimum as they can provide roosts for bats. A condition should be attached to ensure replacement bat roosts are provided as well as protecting as many of the mature trees to compensate for any potential loss of habitat. The badger sett should not be affected by the proposal but that if any work is carried out within certain distances a license will be required. A condition is recommended to ensure stag beetle activity is not curtailed but this should not be at the expense of bat roosts being cut down to form loggeries as habitat for the beetles. Suggestions are made to enhance landscaping in the interests of nature conservation. The provision of a lake is supported and it is recommended that the management of it is sympathetic to the wildlife found in the area. Finally attention is drawn to the need to protect any species or its habitat which is protected by law.

**Thames Water** has no objections to the development.

**Hounslow Council** has acknowledged the application but has not formally responded to it.

**Richmond and Twickenham Primary Care Trust (NHS)** confirm the new surgery is much needed for the doctors as the current one is wholly inadequate particularly as it cannot be made to be compliant with the Disability Discrimination Act. The PCT strongly supports the application for the inclusion of a GP surgery within the development

The **Crime Prevention Officer** confirms that the underground car park is a potentially major concern and that an alternative should be explored. It is desirable that the footpaths are clearly marked and follow a direct route. Concern is expressed if the routes allow intruders to not be easily noticed. The access from Ranelagh Drive could be a concern as it allows intruders an escape route.

**The Council Education officers** advise that an education supplement is required which the applicant has agreed to pay.

**The Council Environmental Health** officers are content with the mitigation being suggested for construction work and thereafter although the working hours form 7.30am to 6pm weekdays and 4pm Saturdays are longer than normal, but if a problem arises it can be dealt with by enforcement notices

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under EHO Regulations. The EHO advises that the applicant appears to be willing to comply with legislation given the detail contained in the ES.

**The Richmond Society** considers the following as successful; scheme careful and imaginative design; good access to and within the site; opening site up for public viewing; overall scale successful (but see below); views from Surrey bank generally good. The Society would have preferred to have seen a more contemporary approach but recognizes the design philosophy taken by the applicant and considers the density responds well to the varying character of the area. However, concern is expressed that the four storey building in the north corner is too high and bulky and recommends a floor be taken off to improve the views from the Surrey bank and nearer viewpoints.

Additionally the **St Margarets Estate Residents Association (SMERA)** (who have employed GMA Planning and Highway consultants to act for the group), **Richmond Environmental Information Trust, Environment Trust for Richmond upon Thames, North St Margarets Residents Association** have made representations.

A total of 17 letters have been received via the Chairmen of SMERA, a petition from SMERA with 181 signatories and 51 individual residents letters, including one with 19 signatories, all expressing concern or objecting on the following grounds:-

1. Public open space too small and more access should be allowed through the site.
2. Should be better related to the river and more spaces be available.
3. Need play equipment.
4. Conflict between main access and public path.
5. Gated development unacceptable.
6. Density too great around Gordon House and Violet Needham.
7. Pubic access to Gordon House Adam's room should be available.
8. Surgery parking could be offered to boat owners for evening parking.
9. Flats too high facing St Margarets Road overdominating two storey houses opposite. Height, mass etc uncharacteristic of the conservation area and thus contrary to PPG 15 advice. Applicant not paid enough attention to PPG 3 with regard to relating the scheme to the wider urban grain and character.
10. Four storey flats will be extremely unneighbourly to residents opposite. Existing buildings set much further back.
11. No space to landscape to soften height.
12. Overlooking and loss of privacy particularly from buildings in the south west corner.
13. Poor use of urban land in the south which takes up to much space with private gardens.
14. Fewer units will alleviate overcrowding and reduce traffic problems.
15. East/west public route poorly articulated.
16. Site should be used for flood storage.
17. Major impact on surrounding area from traffic.
18. Under provision of parking particularly for affordable housing units which will cause overspill onto adjacent roads.
19. Significant disturbance from both construction traffic and operational traffic.
20. Noise and disturbance from construction-mitigation not sufficiently developed and needs public involvement –should be conditioned to protect amenity.
21. Insufficient parking for doctors surgery.
22. Noise and vibration not adequately dealt with in the EIA.
23. Suggestion to move listed wall at Railshead to improve sight lines and safety on the road. Precedent exists for such work to Listed structures to realize significant gains for the community.

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24. Applicants Transport Assessment not robust enough with regard to traffic flowing southward in the peak morning period.
25. Traffic management plan required to ensure harm not caused to surrounding roads and to give more certainty for residents. Suggest Canada gate is retained to spread the flow and movement of traffic. Various suggestions made as to how to minimize construction traffic on residential road network.
26. Should pursue river use for development of site.
27. Railshead Road not appropriate for amount of traffic proposed. Already being overwhelmed by new buildings and activities and danger of emergency services not being able to access the area. It is part of the cycle network and pedestrian way.
28. Loss of historic landscape and thereby contrary to conservation area character and Government advice in PPG 15. Not a brown field site and scheme totally overdevelops the area.
29. Planning Brief has overridden the need to give special consideration to protection of the villa landscapes that define this part for the river.
30. Brief has an inherent conflict between the need for housing and protecting the landscape.
31. St Margarets Lodge will be harmed by the huge building adjacent to it.
32. Loss of wall to Gordon House will cause overlooking of houseboats.
33. Site must be reserved for new primary school in the interest of sustainability.
34. Danger of vehicles entering and leaving Railshead Road at an access which has a narrow bridge and bend on the approach road.
35. Social housing not well related/integrated to rest of site.
36. New wings to Gordon House will adversely affect its character.
37. New wings to Gordon House will improve its appearance.
38. Buses cannot cope with present loads.
39. Insufficient floor space for the affordable housing to meet the Brief and HSG policy.
40. Lack of detail on plans.
41. Suggest the flats could go to the Ranelagh end of site where fewer houses would be affected
42. New boundary wall may reflect noise into houses opposite.
43. Nature conservation being lost from the site which is designated as such.
44. Traffic from new school uses needs to be considered
45. University is only in use for 30 weeks in the year whereas the new uses will be generating traffic all year.
46. Fails the Brief by not creating a mixed community.
47. Just exceeds Government density requirements but could be improved by fewer large houses, more smaller ones and more open space for the community and new residents.
48. Education case for not requiring school on site flawed.
49. Lack of employment potential.
50. Completely fails to deliver on open space requirement of the Brief.

**Amendments:** These are listed at appendix C, a document submitted by the applicant. In summary the principle changes are as follows:-

1. One block of affordable housing reduced in height to three storey nearest south west corner and set further off boundary.
2. Three and four storey private sector flats swapped in height so that three storey nearest south boundary onto Kilmorey Road.
3. Three houses removed to relocate surgery near to Canada gate and that vehicle access retained as ingress only.
4. Some affordable units relocated to north end of site including new separate block.
5. Number of units reduced from 175 to 172: one affordable flat and two private houses deleted.
6. Affordable housing mix changed to meet key worker requirements.

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7. Additional car spaces introduced to provide one space for each affordable unit; 69 in total.
8. Additional car spaces introduced for health centre; 12 in total including some basement parking.
9. Car use of central pedestrian route reduced to emphasise priority footpath/cycle way and amended pathways on this main axis way.
10. Several changes of footprint of buildings across the site to protect treescape.
11. One detached house relocated as a terraced house to protect trees on south part of site.
12. Two detached houses facing river combined into semis and moved further from river to improve open space provision by some 11m southwards.
13. Gates/railings removed from open space and play equipment to be introduced.
14. Crime prevention measures improved.

**Reconsultation:** This has been done through further site notices, a newspaper advert, individual letters to objectors and the amended plans put into Richmond library and the Civic Centre Twickenham.

Further representations:

**The Richmond Society** continues to favour the scheme but is still concerned at the size of the buildings to the north.

**The North St Margarets Residents Association** and 51 individual letters have been received, several noting improvements to the scheme but generally still opposing it for the following reasons:-

1. More car spaces on site acceptable but still concerned at overspill.
2. No progress with regard to lorry routing during construction.
3. Still major concern at four storey flats close to the south and west boundary, notwithstanding tree screen which has limited space to grow in.
4. Refuse bins too close to neighbours.
5. Still a significant overdevelopment.
6. Public open space better but still insignificant across the site and other solutions should be pursued.
7. Limited space to introduce tree screening.
8. Segregated area around Gordon House against Council policy and the Brief.
9. Flats still too high and close together creating a significant mass contrary to character of area.
10. Health centre more appropriate in siting and form.
11. Access to health centre should be carefully controlled on safety grounds.
12. Serious shortfall in school places in reception classes from September 2003 not addressed by amendments.
13. Reference made to covenant, which is not a planning matter.
14. Railshead Road will still bear brunt of traffic and it cannot cope as a sole access point for flats and health centre unless widened.
15. Too little of open land retained, thus seriously harmful to the Conservation Area

**Professional comments:** The national and local policy framework in which to consider this application has been set out above.

The Planning Brief is of significance as Supplementary Planning Guidance for the reasons stated but it should be recognized that it seeks to guide development and cannot therefore be completely prescriptive. It seeks to recommend the mix of uses and to give direction as to how the site could be developed. Clearly there are different ways in which its aims can be progressed and this proposal must be considered against those general objectives whilst also being considered on its own merits.

The application can usefully be considered under the following headings which are intended to aid an understanding of how the scheme seeks to comply with the Brief and UDP policies. Where there are

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issues which require more subjective judgement to be made when coming to a conclusion as to whether it is acceptable, these are discussed.

The following sections will be analysed; Land Use; Layout, Context And Design; Trees, Landscaping And Nature Conservation; Transport/Traffic/Parking; Impact On Neighbours; Public Benefits; Other Matters.

### **Land use:**

#### **Residential**

This is considered to be the most appropriate use for the majority of the site given the relative remoteness of it from the main centres of employment and thus the areas of mixed use. HSG policies seek 40% affordable housing units and the supporting text advises that this should also be reflected in floor space as well.

69 units are proposed as the affordable contribution, which is 40% of the overall total of 172 units. Moreover, the 69 breaks down into 30% for rent and 10% key-worker, shared ownership units with the mix of bedrooms providing the size of accommodation appropriate for each of those categories. It is understood that the Richmond Upon Thames Churches Housing Trust would be the partner for this aspect of the proposal.

40% floor space for affordable housing is not met, being closer to half that promoted by the policy justification. This could be argued as a negative to the scheme. However, this factor was introduced to prevent developers from providing the appropriate number of units whilst keeping floor space to the minimum by proposing fewer rooms with limited space standards. The 40% floor space element was introduced to prevent the policy being circumvented, but the main element remains the 40% unit threshold.

In this case the tenure, size and design of the proposed units are considered to be appropriate and are supported by the Social Registered Landlord. It is acceptable that the Brief would prefer family houses to flats to enable play areas for children but this issue is discussed below.

On balance the view is taken that the amount and mix for the affordable part of the scheme meets the objectives of the UDP and Brief notwithstanding the 40% floorspace figure is not complied with.

In regard to the private sector housing this provides 28 one bedroom flats which seeks to meet another part of the HSG policy by providing small units of accommodation.

Finally over 10% of the units are either designed for or capable of easy adaptation to wheelchair housing also required by HSG policy and the Brief.

The density, taking into account the land allocated for residential and excluding those uses not directly related to the housing, produces a figure of 32.1 units per ha. This is above the Government's minimum standard of 30 units/ha, which is so identified to maximize use of urban land to safeguard green field sites. Indeed Government presses for higher densities for that reason. The proposed density across the site is however relatively low which is due to a number of factors including the need to retain and protect the setting of Listed Buildings, BTMs, trees, the character and appearance of the conservation area, car parking provision and the amenities of neighbours.

It is recognized that the density could be increased with fewer large houses and more small units but the balance across the site taking into account the sensitivity and character of the location is considered to be an effective use of the land.

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### Education

Clearly the site has been in education use for a considerable period of time but continuing it for a similar activity was not felt to be in best interests of the community as a university use brings limited advantage to the locality with many disbenefits, particularly traffic when the campus is fully utilized.

Some of the representations are pressing for the Council to take the opportunity to acquire part of the site for a primary school, arguing that existing and future needs, coupled with the children generated by any new developments, require such a facility which is difficult to achieve elsewhere given limited opportunities for land acquisition and the pressure on existing schools.

Advice was taken from colleagues in the Education Department last year when the Brief was being constructed and more recently in the light of further comments. The conclusion was and continues to be that, notwithstanding the arguments put forward by third parties, there is no specific requirement for educational establishments for the Local Education Authority which could possibly justify purchasing a substantial part of the site for a primary school. The size of the required site is beyond the reach of the council financially and if additional places are required in the area because of changing patterns of demand in the core population together with the child yield for Brunel, this may mean considering the expansion of another school to cater for the demand rather than a new school.

The applicant has identified the possibility of Violet Needham and Clifton Lodge as sites for education use which could provide places for children in the area but this would need to be considered against traffic and impact on neighbours via planning conditions.

The new housing generates a child yield for both primary and secondary schools and this can be dealt with via an education supplement to be paid by the developer which contributes to the expansion of existing and the new schools in the Borough. The applicant has agreed to pay the amount subject to agreement over the precise sum of money and the way it is calculated.

### Community

The application proposes a three No doctors surgery as replacement for one in Crown Road which is of limited capacity. Its size and location are supported by the PCT although it is recognized that it would be on the edge of the catchment area, but limited opportunities exist to build a completely new facility in the locality. This fulfills that part of the Brief and is a recognition that the site has been in a form of community use over many decades.

### Employment

Only a very modest amount of office floor space is being replaced in the Chapel at the north end of the site which equates to approximately 80m<sup>2</sup>. This is a relatively insignificant figure in relation to previous employment levels. However, it is noted that the site is not well placed for easy access by transport apart from the car notwithstanding the bus route on St Margarets Road and the station about 1km to the south, with limited opportunities to improve such provision. In such circumstances and given that the surgery and education uses of buildings to the south will create some employment on the site, as will the housing indirectly, this meets the objectives of the Brief and UDP EMP policies. Moreover, there is existing and new employment opportunities to the north of the site.

### Public open space

As noted in the Brief the area is poorly provided in public open space and this application provides an opportunity to meet this deficiency. The Brief recommends that such open space should link through to the riverside open area and identifies possible locations, which should also be available for the general public as well as residents on site.

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The initial application showed a modest amount of space on the riverside south of Gordon House with railings and a wall running through its centre. This would be linked to St Margarets Road by a path for cyclists, pedestrians and cars using a new zebra crossing at the St Margarets Lodge access to the site.

Following extensive negotiations the public route through the site has been improved by removing almost all vehicles from it and providing a non-car section east of the main driveway into the site. Footpaths have been included to improve safety when crossing the road to the underground garaging. This route would then open out into a larger area of public open space which has been increased in size by setting some of the houses further south and removing the railings, gates and wall to Isleworth promenade. It also gives access to the side of the proposed lake and the space would flow into the existing linear park. There would still be a need to maintain flood defence works and thus some banking would need to take place but the applicant has illustrated how this area could be made interesting for children and adults by introducing play equipment as an attraction and destination for the public and new residents alike.

There is good tree cover at this juncture, with raised grass mound, but this should not prevent the area being enjoyed by those living in the area. Indeed the applicant suggested how the grass mound could offer opportunities to create an attractive area for children to utilize.

The other principle open space on the site is that to the west of Gordon House which is, however, being retained for the use of new residents only. However, there will be views of the building from St Margarets Road, which gives a feeling of openness not currently available.

Finally, the Brief supported by CCE policy recommends the provision of play space for children on the new estate particularly if gardens are not being provided. Some modest but useable areas have been located on the plan especially for younger children living in the affordable housing units close to the main blocks of flats. These can be made more enjoyable with the installation of some play equipment and do not need to be exclusively used by new children to the area.

It is recognized that the issue of lack of public open space is a key problem for the area but it is considered that following amendments, a reasonable and satisfactory area of useable space has now been included in the application linked by a well-defined axis across the site. The exact detailing will be key to the success of this space and that can be the subject of conditions if permission is forthcoming.

### **Layout, context and design:**

The Planning Brief recognises the importance of the site in relation to the river and its environs and that part of the conservation area to the immediate south based on St Margarets Estate. The Listed Buildings and BTMs are key factors in ensuring any development must be compatible with the qualities of the locality, which are extremely high. Relevant UDP ENV and BLT policies are in the Brief and at the head of this report.

As noted in the Conservation Area Study the character of the St Margarets Estate is defined by the grandiose villas within large gardens; an abundance of greenery and mature planting; the relationship of spaces between properties affording glimpsed views of the communal gardens behind; privacy and enclosure by high walls; the vicinity of the Thames and the idiosyncratic mix of property styles. Key strengths of the area have been listed on page five of this report.

### **Phase 1**

The applicant has sought to follow the general trend of large buildings of mixed style with generous space between buildings in the south part of the site as phase one, whilst being cognizant of the need to make best use of urban land. This theme is not so clearly pursued when taking into account that a

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terrace addresses Ranelagh Drive and this is less of an obvious reflection of the estate which the applicant seeks to follow. However, there are smaller terraces in nearby roads to the west of the site. The houses have been lowered marginally to respect the setting of Violet Needham and following further examination it is considered that the BTMs position holding the corner of Kilmorey Road and Ranelagh Drive will not be prejudiced. The view of it from the river will be somewhat diminished but this is partly obstructed by the current trees. The east end of the building will be framed by the two terraces which will draw the eye to this attractive elevation.

The main concept is of pairs of substantial houses fronting a new gently curving road leading to a lake, an idea borrowed from the pleasure gardens to the south but with the advantage that it can be enjoyed by the wider public due to permeability into the site.

The proposed houses facing the riverside have been split into pairs and set back from the promenade by an average of 20m with trees retained in the gardens and more planting proposed. The wall to the promenade would be removed and be replaced by a lower wall with railings to accord with the Brief to open up the riverside to views into and through the site. This group of houses would replace the Kathleen Saunders teaching block which whilst of lesser size is located much closer to the boundary wall.

Their varied and interesting designs seek to reflect that to the south which is a key element adding variety to the conservation area.

Spaces between the houses have also been enlarged to protect important trees which give character and distinctiveness to this part of the site and should assist in maintaining the open landscape apparent from views from the towpaths and longer vistas from the listed bridges over the Thames which the campus currently provides.

It is therefore considered that this phase is acceptable in terms of UDP policies and the SPG objectives.

### Phase 2

The openness that the conservation area, Thames Landscape Strategy and Thames Policy Area seek to protect can be said to be enhanced by the removal of the rather unattractive range of buildings attached to the south end of Gordon House and their replacement with much more restrained and modest wings. The boundary wall in front of it is also to be taken down and be replaced with more permeable feature. The wall between the House and new dwellings to the south will also be taken away to enliven the open space being created.

These works which will further enhance its landmark open setting as seen from the east and up and down the river will clearly improve Gordon House's setting. This is the main public view of the building.

It is recognized that the character of the conservation area changes as one journeys north across the site as it departs from the more open aspects of land to the south to the more built up area to the west and the industrial buildings beyond Railshead Road. The application site currently includes a mixture of buildings from different eras with little aesthetic appeal nor relationship to one another. Whilst there is a large area of openness to the west of Gordon House it is not easily understood or known unless access is available to the private grounds.

The applicant effectively seeks to establish a pattern and layout of development in the northern half of the site which does not prejudice the setting of the Listed Buildings/BTMs nor the major treescape but respects the qualities of the Conservation Area which has a different character from that to the south, whilst meeting housing requirements. It is reasonable to argue that this part of the site can effectively

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create its own character based around protecting and enhancing the setting of Gordon House and its landmark location in relation to the river landscape. Indeed, it currently effectively forms its own sub division within the conservation area.

Opposite the site is a mixture of terraces and semi-detached houses and commercial properties, none of which are in the conservation area. Those further south have some charm compared to the less interesting ones towards the River Crane boundary. It is not considered to be essential in townscape terms that this pattern of development needs to be followed on the application site which already sets its own character.

Criticism has been levelled at the number, disposition and height of the blocks of flats adjacent to St Margarets Road and Kilmorey Road in the south west corner. Efforts have been made to improve the relationship with the streetscape and in turn neighbours properties (the latter are dealt with in a section below). This has been successful in that the buildings have either been partly pulled away from site boundaries and/or reduced in height to lessen their dominance in the streetscape whilst providing opportunities to retain trees and provide limited space to for new planting.

It should be noted that there are four storey buildings on the site so this is not a new feature but clearly the new would be closer to the site boundaries and include pitched roofs compared to some of the bland university blocks.

It is noted that this part of the site is relatively densely developed but there is space around each of the blocks of flats with gaps between which will allow views between buildings although it is acknowledged that the flats, will from some passing view points, appear as a larger entity. It is not however, considered that that is harmful to the conservation area or wider townscape which is as stated a mixture of heights and types of dwellings from different periods.

St Margarets Lodge and the walls/gates are kept within an attractive setting immediately around its frontage with the public route in front of it and its new neighbours.

The central feature of this northern part of the development is the two lines of terraced three storey houses facing one another across a partially enclosed vista to the rear of Gordon House. The break in the boundary wall will give new views into the site and the houses will frame the main elevation of the Listed Building. This is a more formal concept but can be successful if properly detailed. The houses have been kept at three storeys, as the Brief recommends, to prevent dominance of Gordon House which clearly must be given the pre-eminence that it deserves.

It is noted that English Heritage supports this design philosophy in terms of the impact on the conservation area and with respect to the setting of the listed building.

The surgery has been relocated into a more accessible position and has been redesigned by changing the roof treatment to a more appropriate form. It now has two and a half storeys with full-pitched roof. This provides the necessary floorspace for the users and creates an attractively designed building, reflecting its different function, set back from St Margarets Road.

The surgery would be adjacent to the final part of the scheme which comprises two buildings containing 45 affordable units. The main building which would have a partially splayed north section rises up to a full four storeys capped by a large pitched roof which contains a number of units within it. This effectively gives a height of five storeys close to the north end of the site visible some distance along St Margarets Road. This will also be seen as the site is approached from the Hounslow but should not block the attractive glimpsed views of Gordon House's clock tower when approaching from the north.

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This is a large building in terms of height and footprint and will be a major statement when entering the borough but that part of the site already currently contains a large teaching block of three storeys.

The tree screen is to be retained between the flats and Railshead Road which will soften the impact of the new build, as is the Listed wall which acts as the boundary to the site. A freestanding three storey block joins these flats, which has been located to the position that the health centre initially was proposed at.

The Richmond Society's concern that the height may prejudice the setting of Gordon House has been answered by drawings which demonstrate that when viewed from the Surrey towpath the eye line is such that the roofs of the flats will not be visible behind Gordon House and, if it was, it would only be a relatively fleeting moment which would be difficult to suggest is harmful to its setting.

The design of all the flat blocks follow a similar concept in terms of detailing and materials which provides coherence to that part of the development.

The Brief suggests that buildings higher than three storeys may be acceptable if they do not prejudice the setting of Gordon House, nor the amenities of the conservation area or river landscape. The Buildings are considered to be sufficiently far away from the main house not to harm its appearance nor its setting.

Turning to the more direct relationship with the river it should be noted that Gordon House and its 'stables' lie within the Thames Policy Area as does the promenade, the river and land further east including the Royal Park. This is also Metropolitan Open Land up to the site boundary and thus the layout must be considered against the objectives of protecting the special character of the Thames and its openness.

Some of the commentary above refers to this but in essence it is considered that the enhanced setting of the Listed Buildings and the opening of the walls facing the riverside coupled with the removal of the large and poorly positioned Kathleen Saunders Building, the creation of the public open space with the opportunity for landscaping the promenade must be gauged against the introduction of the houses nearer the river at the south end of the site. On balance the view is taken that the benefits outweigh any objections there might be to some of the new houses being located in the southern area. The opportunity has been taken to set the houses further back from the Metropolitan Open Land boundary during negotiations.

In conclusion, it is considered that whilst many of the arguments rely on subjective judgement, the views expressed above have been based on professional opinion that overall the thrust and detail of the layout, density and design concept is one that can be supported as an original and acceptable way to develop the site.

Octagon has an extremely good track record of producing quality development in such sensitive locations which gives further comfort to the belief that the scheme will be a success.

### **Trees, landscape and nature conservation:**

There are many important trees on this site, some dating back to when Gordon House and St Margarets House were separate sites and it is these which give the site its character of buildings within a landscape dominated area as referred to in the Conservation area study. The applicant has submitted a full survey of the trees and this has been carefully and fully assessed. The scheme has been modified in a number of ways to either remove buildings from areas where they threatened trees or to ease

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footprints away from tree spreads. Following these modifications the issue of retaining the majority of trees on site has been satisfactorily resolved.

A large chestnut on the St Margarets Road frontage close to the affordable housing block has limited life left and it is recommended that it be removed to allow for a more modest replacement, another on the corner of the Kilmorey Road is to be retained unless it blocks site lines from the adjusted junction. Until the wall is taken down it is somewhat difficult to predict whether it will have to be removed but this will be a decision to make at a later date.

Evergreen trees, including yews, facing Kilmorey Road are to be retained to aid screening from upper floor windows and to provide a natural softening of impact of the new buildings.

There are two large grassed mounds within the site, which may have some historic reference. Both are being retained, the one closest to the river can be partly utilized as a play area for children.

Reference is made to the Lime Walk, which is a path between two lines of limes to the south of the boundary wall, which runs through the centre of the site. It has been suggested in the Brief that this should be the line for the east/west public route. However, upon further inspection it has become apparent that the limes have limited life left due to pollarding and poor surgery over time and the opportunity has been taken to position the public path to the north of the wall which is considered to be a more suitable route to follow.

The removal of much of the boundary wall to the riverside will provide the opportunity to link the landscape in the site with that on the riverside and to Old Deer Park beyond.

Some opposition has been lodged to the loss of the historic landscape which it is argued flies in the face of both legislation and the Council's own environmental policies. The argument is, as it is understood, that, as much of the land has never been developed, this effectively means that it should not be in the future due to its importance as the remnants of a historic landscape.

Whilst recognizing the concerns expressed by third parties the site is not on the Register of Parks and Gardens of Special Historic Interest although the ENV policies of the UDP seek to ensure development in the Thames Landscape should be given special attention. English Heritage, who has specialist knowledge on this subject, has not raised opposition to the scheme. Clearly the general landscape and impact on the river, the setting of the Listed Buildings and the BTMs and the wider conservation area are material factors in deciding whether such a proposal should proceed and for the reasons stated in this report it is not considered that the landscape would be materially harmed. This is a judgment that members will need to consider as part of the application.

It is also noted that when the site came into Richmond's area there was a mini public inquiry into the proposed Unitary Development Plan for the site (the Inquiry related to other matters as well). The Council sought to include the campus as MOL and as an Area of Special Character (ASC) due to its relationship to the River and wider open area.

The Inspector noted the qualities of the site but did not confirm the designations. He felt the site did not meet the criteria of either designation as it was, and is, surrounded by walls and comprises several unattractive buildings. The ASC, he noted, is an 'extensive area of mainly open land with historic, landscape, or nature conservation value whose preservation is essential to retain the character of London as a whole.' He concluded that the Conservation Area status and treed character of the site were key factors to provide the appropriate protection to the site and that the objectives of the Thames Landscape Strategy could be properly met without MOL/ASC designations.

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This gives further weight to the argument that the land has development potential, subject to proper consideration to the Listed Buildings, BTMs, trees and the conservation area. This is reflected in Proposal T29.

As part of the package of site improvements the applicant has offered to fund the Thames Landscape Strategy Proposals, supported by Arcadia, for removal of the scrub planting along the river's edge, the reinstatement of the railings near to the site, resurfacing of the promenade and Railshead Road.

In the Environmental Statement a section refers to the nature conservation value of the site and advice has been taken from English Nature. The site has also been surveyed for the Council as part of a borough wide study in 1999. The amendments to the scheme have enabled more of the older trees to be protected which English Nature have suggested could be the source of bat roosts.

(On a point of information the southern part of the site is shown on the Proposals Map of the UDP as designated as an 'Other site of Nature Conservation Importance' wherein policy ENV 18 applies. This designation is a graphical error in the Plan as the site is not of sufficient nature conservation value to warrant such a designation following the surveys and advice referred to above. This is being corrected in the current Modifications to the Plan.)

This is not to say that the site has no value for nature; indeed its location adjacent to the Thames which is of Metropolitan Importance with regard to this issue, will provide an opportunity to enhance the area and the Environment Agency plus others can offer advice upon this when the submission of details to discharge conditions is considered. English Nature notes that the lake feature could be a very important factor to enhance wildlife activity if properly designed and managed.

No significant issues have arisen which cannot be dealt with by conditions if planning permission is given. Certain works may require separate licenses from the relevant Government Departments and the applicant will need to take advice on how to deal with those points but none appear to give rise to reasons why the development could not be implemented.

### **Transport, traffic and parking:**

The application has been accompanied by a Transport Impact Assessment (TIA) as part of the Environmental Statement which seeks to address the twin issues of construction traffic and operational traffic (when the development is complete). The former is not normally considered under a planning application, as there are other controls appropriate. However, given the size of the development and the length of time it is likely to take to complete due to the phasing, the applicant has provided extensive information on it. This will be addressed after the operational traffic has been analysed.

The Planning Brief refers to the major issues that need to be addressed in relation to the TRN policies of the UDP and Government policy; generally to promote sustainable forms of transport and to bring about an overall reduction in road traffic.

### **Traffic flows**

The applicant has sought to demonstrate that the traffic generated by the new proposal will be no worse (the conclusion is that it will be significantly less) than when the University was fully occupied in 1997/8.

Surveys and assumptions have been made, based on best practice and generally accepted models of transport movements (TRICS) as to how the levels and times of traffic will impact on the local area. These have been considered by officers and third parties, including consultant highways engineers commissioned by SMERA.

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In essence the applicant concludes that there will be an overall reduction in traffic when the development is fully occupied. Some key figures show that the level of University traffic was some 1700 vehicle movements between 7am to 7pm week days compared to 744 from the new housing. This does not however include the surgery use which could add on another 193 daily trips. It is reasonable to compare the housing traffic with the University as the surgery visitors are more likely to come to the site across the day rather than all arriving/leaving in the peak hours which is the key point for consideration.

The TIA suggests that at its capacity the University had 294 vehicles visiting the site in the a.m. peak and 147 leaving in the p.m. peak compared to the housing which will be 79 leaving and 75 arriving in the a.m. and p.m. respectively. A worst case suggested by our Highway Engineers suggests these figures could go up to 100 movements but this is still well below the previous maximum use of the site.

The use of Clifton Lodge and Violet Needham Chapel have not been built into the assessment because their specific end users have not been identified. However, conditions are recommended to protect both highway and the amenity of the area. Moreover, their size will limit the amount of activity. As the Chapel is likely to be used for nursery school purpose which tend to have delivery and collection of children spread over a period of time rather than arriving/ leaving at the same time this should not impact heavily on the highway.

Therefore, allowing for a certain amount of flexibility and interpretation in the way the figures have been derived officers consider that it is not unreasonable to assume there will be materially less traffic than the situation prevailing when the campus was fully occupied.

Housing however, will create outward movement in the peak a.m. period and inward in the peak p.m. whereas the university traffic movements are reversed. This means that there will be some more traffic in the a.m. period particularly going south to the A316. This is a potential concern due to the current levels of rat running through the roads to the south of the campus. The applicant has agreed to provide monies for traffic calming of Ailsa and St George's Roads in particular, if considered necessary, to minimise commuter traffic seeking to avoid the St Margarets Road/ A316 junction. Traffic calming is also proposed for Kilmorey Road and Railshead Road to ensure safety and environmental improvements are gained.

Residents make the point that the University is only occupied for about 30 weeks in the year compared to the housing etc which will create traffic all year. However, the transport assessment concludes that from a highway safety aspect the development will not cause harm to road conditions and in fact will create an overall reduction in vehicles to the site in accordance with Government and Council policy.

Moreover, coupled with the traffic calming, improvements are suggested at some of the access points onto the road network with the easing of radii, widening of road mouths, re-working of road markings in Kilmorey Road and sight line improvements at the Kilmorey Road/St Margarets Road junction.

The re-use of Canada gate for inward traffic for the surgery in particular will help to take some of the two-way traffic off Railshead Road which will provide the main access for 45 flats and three houses. Railshead currently has two access points into the University including one of the main service accesses. One of these will be closed allowing two additional on street parking spaces and with the traffic calming and proposed shared road surface this should enhance the setting of the road and make safety a priority for all users including those on foot or bike using the promenade.

There has been suggestions to demolish the boundary wall and widen Railshead but this is considered ill advised as the wall is Listed and of great importance. English Heritage has not responded favourably

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to this. Setting the wall back could also affect trees and will diminish part of the charm of the enclosed nature of the road.

The application seeks to meet the objectives of the Brief by utilizing a series of accesses around the site to spread the movement of vehicles and by not proposing a vehicular exit onto St Margarets Road; this would not be recommended by officers on safety grounds.

### **Parking**

The general thrust of the proposal is to avoid the car dominating the development and thus the landscape. This has been achieved chiefly by underground parking and surrounding most of the ground level parking by buildings and planting to avoid views of it from outside the site and from the new public route through the site. This is supported by the Brief.

Following amendments the car parking provided, some 280 spaces compared to the current 166, meets the maximum car parking standards set by the Council based on Government policy. Each of the affordable units will have access to a car space required. This is particularly important at the north end of the site where on street parking is heavy and in great demand from existing users. The surgery will have 12 spaces to accord with the standards.

There are eight extra car spaces in the main basement car park but this is partly to ensure usability of them given the location of pillars supporting the structure above.

The applicant has met with the Crime Prevention Officer and has added security measures to the proposal to minimise the likelihood of crime.

### **Layout**

Generally the layout accords with highway requirements especially as it is to be primarily shared surfaces and privately retained. Parking and turning areas meet the normal standards of aisle widths etc. The gradients to the underground parking should not be more than 1.10 for safety reasons. The Brief requires the provision of recycling facilities which will need to be accommodated as part of the overall refuse areas

### **Other means of movement**

The applicant confirms that each unit will have cycle parking in accordance with the Council's standards and that the new publicly accessible routes through the site will enable both pedestrian and cyclists to enjoy improved safer routes which will encourage such modes compared to the car. This route will link onto the National Cycle Network heading towards Richmond and be served by the provision of a new controlled road crossing on St Margarets Road.

With regard to public transport initiatives referred to in the Brief, the applicant notes the proximity of St Margarets Station and Richmond Town centre for rail travel and that the No.H37 bus route runs past the site frequently linking Richmond to Hounslow via St Margarets. Reference is also made to the No.267 bus route which does access Twickenham directly but is a good walk away from parts of the site.

Apart from the No.H37 whose bus stops close to the site, St Margarets station is over 800m from Brunel which is a little over the guidelines published by the Institution of Highway and Transportation as desirable distances to walk. However, the applicant having explored this with the bus company has determined that there is not a need to improve public transport links to the site given the existing infrastructure. Officers have concluded that it is not in an area so poorly served by public transport that the Council is likely to be supported on appeal if no provision is being made by the applicant.

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Consideration has been given as suggested in the Brief to the possible widening of St Margarets pavement adjacent to the site. It is quite narrow and is thus not particularly pleasant to use especially when traffic is flowing past.

This would effectively result in the removal of parts of the Listed boundary wall which is also a key feature in the Conservation area. The applicant argues that by providing a second crossing point on St Margarets Road this enables pedestrians to cross the road to avoid needing to use the narrow footpath. Alternatively pedestrians could use the improved Railshead Road route down to the river to avoid the pavement. It may also be possible to walk through the site from Railshead to the surgery and beyond although this may not be sensible to encourage, as it would result in accessing onto a turning serving incoming traffic.

The loss of the wall and the second crossing are factors that are considered to mitigate against the widening of the pavement.

### Construction traffic

This is an understandable concern for residents and other occupiers in the area and the applicant has submitted much information about how this could be accommodated with the minimum disturbance to the neighbourhood whilst taking into account highway safety.

A further submission has been put in seeking to offer solutions to this issue. Some third parties have also suggested constructive ideas.

The main access point for phase one would be from Ranelagh Drive and this effectively means that St Margarets Drive is the likely main route in and out. However, it has been suggested that a oneway system could be managed to bring lorries arriving from the A316 via the Avenue and Ranelagh Drive to minimise disturbances to residents and exiting via St Margarets Drive. The second phase could use St Margarets Road direct although this could create more danger to road users. No final decision has been made on this aspect of the development yet and officers will continue to seek the most appropriate routes. This can be the subject of discussion/input from representatives of the community based on experience from phase 1 and is intended to form part of the s106 agreement.

### Impact on immediate neighbourhood

The issue of traffic/parking which is a key consideration referred to by many residents has been considered above.

Other direct impacts relate to whether the new buildings result in visual intrusions, are overbearing, cause material loss of privacy and/or outlook or are generally unneighbourly to an extent that warrants their refusal.

The site is directly east of the St Margarets Road properties, and north and east of those in Kilmorey Road. Gordon House remains in between the development and the houseboats at Thistleworth marina.

In these circumstances and taking into account the reduced height of some of the blocks of flats, their repositioning generally further from the boundaries, the retention of some of the trees, some of which are evergreen and the separation by public highways, it is difficult to argue reasonably that the buildings will cause visual intrusion or general unneighbourliness to the nearest properties.

It is recognised that such a radical change in the environment will cause concern but the amended plans do respond affirmatively to many of the legitimate matters raised by residents on the initial submission.

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Loss of sun light is minimised as most of the new build is to the east or north of existing houses and therefore only very early morning sun light may be diminished, insufficient to argue against the scheme. General levels of daylight will remain as the main buildings are at their nearest 15m and generally more than 20m from garden boundaries. These are not unacceptable relationships in urban areas.

The redesign of the blocks near the Kilmorey/St Margarets Rd corner have sought to minimise overlooking by angling the blocks to neighbours and retaining trees to act as screens. Windows facing across public highways are difficult to object to and those facing the east/west arm of Kilmorey Road have a limited view towards the side gardens of houses, which generally do not have such private aspects because of their close relationship with the public highway. It is considered that the amenities of neighbours have been well protected in the remodeled design.

Overlooking of the marina by the removal of the wall to Gordon House is difficult to sustain given the distances and the fact that higher level windows in the Listed Buildings already provide a viewing platform as does the promenade at the lower level.

The removal of the campus and its associated activities of on street parking overflow and noise and disturbance from large numbers of students/visitors can be considered to be a gain to the residential amenity of the area.

### **Public benefits to be obtained through a section 106 agreement:**

These can be summarised as follows:-

1. 69 affordable housing units.
2. Education supplement of £606,360.
3. Public access through site and maintenance thereof (land retained in applicants ownership).
4. Public open space and maintenance thereof (land retained in applicants ownership).
5. Traffic calming in Railshead, Kilmorey, Ailsa and St George's Roads.
6. Pedestrian crossing on St Margarets Road.
7. New surfacing and shared surface in Railshead.
8. Environmental improvements to Isleworth Promenade up to a value of £80,000.
9. Provision of health centre.
10. Restoration of listed buildings and improved public views of them.

All of these benefits and obligations are considered to be fairly and reasonably justified in terms of the proposed development.

### **Other matters:**

**English Heritage** has confirmed that whilst archaeology is an issue this can best be dealt with by attaching a condition to any permission that would enable the matter to be considered through further work at demolition stage.

**The Environment Agency** has no objections to the scheme with regard to flood risk etc subject to appropriate conditions being attached to ensure flood defences are maintained and nature conservation matters can be enhanced along and adjacent to the river corridor.

The ES includes reports on noise levels during construction and thereafter which have been considered by officers in the Environmental Health Section. In summary and, notwithstanding comments by third parties, the conclusions of those reports are considered to be reasonable subject to applying the mitigation methods. The contractor will need to comply with the relevant legislation to ensure the impact of the building operations do not cause unnecessary problems within the neighbourhood. This would be

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an ideal case for the applicant to sign up to the Council's suggestions for a Considerate Contractor Scheme which is likely to be re-launched.

The applicant has outlined in the ES a series of initiatives based on Government advice as to how to target sustainable construction by reusing existing buildings to minimizing energy in construction to preserving and enhancing biodiversity. The UDP seeks to ensure development efficiently maximizes the effective use of resource including water, and implement recycling schemes. In broad terms the applicant has demonstrated how these requirements can be met and several of them will occur at the Building Regulation stage e.g. energy conservation. The use of such sites will protect green field areas from development which is a key feature of the Government and the Council in the interests of sustainability.

### **Conclusions:**

This is a very important site for immediate neighbours and those a little further away but also for the wider community as it forms part of the River Thames whose significance has been drawn out in the sections above.

The development proposed has sought to meet the various objectives identified in the Planning Brief whilst seeking to minimise the adverse impacts of the proposal on the environment and to provide a development that will add to the richness of the locality.

Alternative solutions exist for the site, as is the case with most development proposals. However, having carefully considered all the representations submitted through the course of the application and taking into account the policies applicable it is concluded that the proposals now before the Council are considered to deliver the main requirements of the Brief and relevant policies in an attractive and appropriate way.

Many matters of detail remain to be considered and these can be dealt with through conditions and the Section 106 planning agreement that will accompany the final decision.

**I therefore recommend that the Committee decide whether to authorise the completion of a Section 106 agreement to secure the provision of those matters listed above and subject thereto, authorise the Development Control Manager to grant planning permission under delegated powers subject to the conditions and informatives set out below, and subject to no adverse direction from the Secretary of State.**

### **Standard conditions:**

- BD04 - Details to specified scale - '1.20' 'part elevation/section of each house/flat type/health care building, extensions to Gordon House, Geoffrey Knight House and Chapel, changes to existing boundary walls including new railings and any gates'
- BD10 - Sample panels of brickwork
- BD11 - Miscellaneous details - 'bin stores'
- BD12 - Details to be approved
- DS01A - Mobility housing
- DS02 - Wheelchair housing
- DS03 - Parking for people with disabilities
- DV02A - Boundary fencing - development commencement
- DV19A - Parking - private vehicles (communal) - 'parking spaces'
- DV20A - Parking - private vehicles (dwellings) - 'garages and parking spaces'
- DV21A - Parking - commercial - '12 spaces for the health centre and one space for the office user'
- DV27A - Recycling - details required

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- DV29A - Soil decontamination
- DV32 - Communal parking spaces - 'None of the communal parking spaces shown on approved drawing number 900/01a.....'
- DV33A - No reduction in dwelling units
- DV40 - Travel plan - 'Any educational use shall not be commenced.....'
- GD02A - Restriction on alterations/extensions/forecourt parking-general amenity - add to condition .. 'and areas of forecourt parking...' add to reason '..and the treescape'
- HM01 - Specific use within general use class - '..healthcare centre..' 'D1' REASON: other uses within Use Class D1 may result in traffic conditions which could be prejudicial to the amenities of the area.
- LA11A - Landscaping required - hard and soft
- LA21 - Protective fencing - large sites
- LA27 - Root treatment
- LA30 - Landscape works - implementation
- LA32 - Replacement tree planting
- LA33 - Landscape Management plan-large schemes - add 'The plan shall include management which is sympathetic to the fact that stag beetles, badgers and bats currently use the site.'
- LB01 - Part demolition safeguard wall
- LB12A - Archaeology - add to condition - 'The development shall only take place in accordance with the detailed scheme pursuant to this condition. The archaeological works shall only be carried out by a suitably qualified investigating body acceptable to the Local Planning Authority.'
- PK02A - Parking/loading/turning construction - 'parking/turning ' 'approved drawings'
- PK06A - Cycle parking
- RD02A - Junctions-construct according to drawing
- RD04A - Details required - access road
- RD10A - Gradients of ramps

### **Non-standard conditions:**

- NS01 - The finished floor levels of the development should be at or above 6.24 AOD (N) unless otherwise agreed in writing with the Local Planning Authority. REASON: To provide protection to the buildings from flooding.
- NS02 - No development approved by this permission shall be commenced until a scheme for maintaining the flood defences has been approved by the Local Planning Authority. The scheme shall be constructed and completed in accordance with the approved plans. REASON: To maintain flood defences for the protection of the site from flooding.
- NS03 - There shall be no storage of building materials within 16m of the River Thames without first obtaining the written agreement with the Local Planning Authority. REASON: To reduce the impact of the proposed development on wildlife habitats up- and downstream including bank side habitats.
- NS04 - The proposed lake water feature shall not be constructed other than in accordance with details which shall be submitted to and be approved in writing by the Local Planning Authority. REASON: To ensure that it enhances the conservation value of the site and provides undisturbed refuges for wildlife using the river corridor.
- NS05 - No soakaways shall be constructed such that they penetrate the water table, and they shall not in any event exceed 2m below existing ground level. REASON: To prevent pollution of the groundwater
- NS06 - No soakaways shall be constructed in contaminated land. REASON: To prevent pollution of the groundwater

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- NS07 - The construction of the surface water drainage system and source control works shall be carried out in accordance with details to be submitted to and approved in writing by the Local Planning Authority. REASON: To prevent pollution of the water environment
- NS08 - A 16m buffer zone along side the River Thames shall be established in accordance with details which shall be submitted to and be approved in writing by the Local Planning Authority before the development commences. REASON: To maintain the character of the watercourse and provide undisturbed refuges for wildlife using the river corridor.
- NS09 - That artificial bat boxes shall be installed across the site in accordance with details to be submitted to and be approved in writing by the Local Planning Authority. REASON: To preserve and enhance nature conservation interests.
- NS10 - That as part of the development hereby approved off site works to the adjoining highways as shown on the submitted drawings and within the Section 106 agreement shall be carried out prior to the occupation of the relevant parts of the development (unless otherwise agreed in writing with the Local Planning Authority), in accordance with details to be submitted to and approved in writing by the Local Planning Authority. REASON: To ensure a safe and convenient form of development is carried out and to enhance the amenities of the area.
- NS11 - The development shall not commence until a programme of works and phasing of the development has been submitted to and approved in writing by the Local Planning Authority. The proposed phasing of the development shall be by reference to specific areas which in total cover the whole site and access thereto. REASON: To ensure the provision of the affordable housing, public route through the site and the works to the Listed buildings on the north part of the site are provided, in particular, in accordance with UDP policies and the Planning Brief.
- NS12 - Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 Clifton Lodge and Violet Needham Chapel shall not be occupied for any use within Use Class D1 until full details of the proposed uses have been submitted to and approved in writing by the Local Planning Authority. REASON: A global D1 Use may result in activities and traffic generation prejudicial to the amenities and safety of the area
- NS13 - The development shall not be carried out otherwise then in accordance with detailed drawings including plans, elevations, sections, signage (showing access arrangements) and surface treatment of the proposed footpaths thorough the site and the public open space and play equipment thereon; such drawings to be submitted to and approved in writing by the Local Planning Authority. and they shall be provided as part of the development hereby approved. REASON: To ensure the amenity of the area is protected and the provision of the public advantages are provided in a satisfactory way.
- NS14 - The development shall not be carried out otherwise then in accordance with detailed drawings of the elevations and setting out of the play equipment for the two play areas in the north and south west corner of the site as shown on the approved plan, such drawings to be submitted to and approved in writing by the Local Planning Authority and the approved equipment shall be provided as part of the development hereby approved. REASON: to comply with the terms of the application and to meet the needs of the residents.

### **Standard informatives:**

- IE05A - Noise control - building sites
- IH03 - Vehicle crossovers
- IH06 - Damage to public highway
- IL10 - Building regulations
- IL12 - Approved drawing Nos - 'A(PL)002/P2, 102/P1, 202/P1, 012/P1, 112/P1, 212/P1, 000/P1, 100/P1, 200/P1, 001/P1, 101/P1, 201/P1, 010/P1, 110/P1, 210/P1, 011/P1, 111/P1,

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- 211/P1, 003/P1, 103/P1, 203/P1 received on 12 December 2002, 900/01A, 42A, 43A, 44A, 45A, 46A, 03A, 04A, 22A, 30A, 34A, 23A, 24A, 36A, 02, 35A, 55, 06A, 09A, 08A, 10A, 40A, 07B, 05A, 15A, 16A, 17A, 18A, 19A, 21A, 25A, 26A, 27A, 28A, 56, 31A, 33A, 49, 37A, 57 received on 24 April 2003 and 38B, 39B, 58A received on 22 May 2003'
- IL13 - Section 106
- IL16 - Relevant policies and proposals - 'ENV 1, 2, 3, 6, 7, 8, 10, 11, 12, 13, 14, 17, 18, 19, 20, 22, 23, 24, 25, 33, 43 and 47, EMP 5, HEP 3, 7 and 9, HSG 1, 4, 6, 7, 8, 11, 12, 13, 17 and 18, REC 2 and 7, RIV 1, 2, 3, 12, 13 and 14, STG 2, 5, 6 and 11, TRN 6, 8, 9, 22 and 23' 'BLT 2, 3, 4, 5, 7, 11, 14, 15, 16, 17, 26 and 31, CCE 6, 8, 10 and 24, EMP 4, ENV 1, 4, 5, 9, 10, 12, 19, 20, 21, 24, 26, 27, 32, 33, 34, 35 and 37, HSG 1, 4, 6, 7, 8, 11, 12, 13, 17 and 18, IMP 1, 3 and 4, STG 2, 3, 6, 7 and 11, TRN 1, 2, 4, 9, 12 and 13; RPG 3B/9B'
- IM11 - Use of hardwoods
- IM12 - Graffiti
- IT06 - Nature conservation - add 'The Local Planning Authority advise that such details should be developed in conjunction with the comments from English Nature and the Environment Agency'
- IX03 - Soil and surface water drainage
- IX12 - Environment Agency - add 'You are referred to the letter dated 19 March 2003 to LBRUT and copied to Dalton Warner Davis, in particular a number of informatives within that letter'

### **Non-standard informatives:**

- NI01 - The applicant should be aware of its responsibilities under the Conservation (Natural Habitats) regulations 1994 and the Wildlife and Countryside Act 1981 (as amended) and it is recommended that contact is made with the Department of the Environment, Food and Rural Affairs before proceeding with any work on site, including demolition, with regard to ensuring no harm is caused to protected species.
- NI02 - The applicant is reminded of the need to apply the agreed crime prevention matters described in a note of meeting with the Crime Prevention Officer entitled 'Basement Parking' by Octagon.
- NI03 - The development of this site is likely to damage archaeological remains. The applicant should therefore submit detailed proposals in the form of an archaeological project design in accordance with appropriate English Heritage guidelines.
- NI04 - It is expected that with regard to the phasing of development on the site the affordable housing will form part of the early construction on phase two of the scheme when the land becomes available for development.
- NI05 - The applicant is strongly advised to carry out the design of the development taking into account sustainable issues, particularly those highlighted in Section 5.9 of the Regional Planning Guidance for the South East and policy BLT 31(Energy and Resource Conservation) of the Unitary Development Plan First Review.

### **Background papers:**

Application forms, plans and Environmental Impact Assessment  
Letters from English Heritage, Thames Water, Environment Agency, English Nature, Hounslow Council,  
Letters of representations from third parties  
Planning Brief

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