

Planning Application 12/0719/FUL by TRTG dated March 2012

London Borough of Richmond upon Thames

COMPLIANCE STATEMENT: Prepared June 2013

The purpose of this document is to clarify and explain the compliance and conformity of the proposals set out in the planning application 12/0719/FUL by TRTG dated March 2012 to the final Twickenham Area Action Plan(TAAP With Modifications Feb 2013)

To date, Richmond Council (Planning Department) have not responded to the final submitted documents, for 12/0719/FUL or to a number of requests to discuss the Application.

1.0 Summary.

This Application was submitted by TRTG, for Phase 2 of the renewal and return of the former Twickenham Pool Site to beneficial public use.

Now that Phase 1 The Diamond Jubilee Park is complete, Phase 2 will, through the refurbishment, and provision of additional accommodation to the existing buildings on the site, provide a new riverside community facility including meeting spaces, gallery, potential exhibition space and shared offices for community based and social enterprise organizations. These organisations are the backbone of the Council Compact with local voluntary organisations.

The land surrounding these buildings will enhance and provide additional public amenity space thus aiding the regeneration of the Twickenham town Centre. Planning application 09/0914/FUL (also submitted by TRTG) was utilized by the Council for the creation of The Diamond Jubilee Garden. That application included an illustration of Phase 2 in an aerial view of the Twickenham Riverside site.

In accordance with pledges made by the present Council, it is understood that the implementation and subsequent management of the site would be through a Trust.

In this way the day to day management and maintenance, public access arrangements, improvement, integration with development and change on the surrounding sites, security and operational issues can be managed. A Trust has been set up for this specific purpose

The Application 12/0719/FUL is in conformity with the avowed aim of the *“TAAP to revitalise areas of the Borough, which would benefit most from a range of improvements including enhancements to visual appearance, open spaces, and civic areas including key sites are noted in the TAAP and are subject to further information on detail.”*

- Use of parks and civic spaces
- Transport and parking proposals and principles
- Environmental improvement schemes – large scale and principles

TRTG submits that this Application 12/0719/FUL should be considered by the Council and a favourable decision issued

2.0 LBRuT Twickenham Area Action Plan

The Action Plan states that:-


"The regeneration of Twickenham is being developed alongside the Uplift programme. Both these programmes aim to revitalise areas of the borough which would benefit most from a range of improvements including enhancements to visual appearance, retail areas, open spaces, housing and civic areas. The Council has allocated £11 million to fund both Uplift and the regeneration of Twickenham.

There has been extensive consultation and from the results a development plan has been drawn up called the Twickenham Area Action Plan. This provides a framework for development and change over the next 15 years. Many of the proposals will be brought forward in the next 5 years. The Plan will build on Twickenham's many assets and respond to the requirements of businesses to create a more attractive destination as well as guiding investment to the benefit of the town and its users. The Plan will be adopted in the summer of 2013. Further information on the Twickenham Area Action Plan, as it develops, will be included in the village area newsletters or alternatively you can go to the [Twickenham Area Action Plan](#).

Scope of the Plan

The Twickenham AAP will be a statutory land use plan and the scope will be:

- *Use of land and buildings, including key sites*
- *Use of parks and civic spaces*
- *Transport and parking proposals and principles*
- *Environmental improvement schemes – large scale and principles*
- *Design Guidance – policies and principles*

Due to the nature of an AAP, non-planning matters including economic issues such as business rates, employment levels, rent levels as well as matters relating to rugby and other town centre management issues such as opening hours, promotions, local events cannot be dealt with in the AAP. The Council may decide to produce or initiate other plans and programmes such as an economic support programme or a village plan dealing with such other matters. This [diagram](#)  (pdf, 66KB) shows how the Twickenham AAP fits in with the overall regeneration of Twickenham."

3.0 The LBRuT TAAP

The LBRUT TAAP has further requirements relating to Twickenham Riverside & Approaches in Pages 1 to 89 of the document that the **Planning Application 12/0719/FUL** by TRTG dated March 2012 is in conformity with.

These points need to be read in conjunction with the Main Modifications of the examination in public on the 12th & 19th February 2013 by The Planning Inspector Wendy Burden BA(Hons) DipTP MRTPI (The Riverside & Approaches of the TAAP)

The TAAP References with respect to these modifications are located on the following pages:-

Pages 14 ,18,,22 ,28, Ref 7.5 Map 7.11 Page 54. 55. Map 7.12,56,57.Site TW7 Map 7.13 Page 58.59 60 61.

The modifications are noted as follows:-

DMM1 Page 14 New section added after para 2.4.43

DMM2 Page 18 3.4.2 Bullet Point 4

DMM3 Page 18 3.4.3 Bullet Point 8

DMM 4 Page 22 4.5.2 Bullet Point 1 Bullet Point 5

DMM 5 Page 28 6.1 Bullet pont 1

DMM 9 Page 55 7.5.2.3 Bullet Point 2 ,Bullet Point 3,New Bullet Point

DMM10 Page 56 Map7.12

DMM11 Page 56 7.5.3.1 Bullet Point 1,Bullet Point 2 ,Bullet Point 4

Page 3

DMM 12 Page 57 7.5.4.2 Bullet Point 3,4,5

DMM13 Page 57 7.5.4.3

DMM14 Page 58 7.5.5.2 Bullet Point 2,Bullet Point 4,Bullet Point 6

DMM 15 Page 59 Additional Plan

DMM 16 Page 59 7.5.5.4 Bullet Point 1Bullet Point 4

DMM17 Page 59 7.5.5.5 Bullet Point 1,Bullet Point 2

DMM18 Page 60 7.5.5.6 Bullet Point 2 ,Bullet Point 3,Bullet Point 6,Bullet Point 7.

The Councils purchase of Santander block and the car park to its rear will enable (7.5.5.5 DMM17) to be progressed at an early date thereby creating the view and vision 3.1.1 (3.4.3 BP 4,7,8,DMM3 2.4.43 BP 2)

4.0 Brief description of Application 12 /0719/FUL dated 19/3/12 by TRTG

Planning Application Submission

Proposals for Twickenham Swimming Pool; Bath House, Cafe Building &Toilets. Refurbishment & Additional Accommodation.

Contents

Application Supporting Letter.

Design & Access Statement. List of Interested Organisations. Existing Use Distribution. Proposed Use. Floor Space Allocation.

Proposed Development Floor Space (see 12/0719/FUL)

The Application 12/0719/FUL Dated March 2012

This Application is submitted by TRTG, and is for Phase 2 of the renewal and return of the former Twickenham Pool Site to beneficial public use.

Phase 1 is now in public use utilising a Planning Approval 09/0914/FUL initiated by TRTG, now called the Diamond Jubilee Garden.

Phase 2 will, through the refurbishment, and provision of additional accommodation to the existing buildings on the site, provide a new riverside community facility including meeting spaces, gallery and potential exhibition space and shared offices for community based and social enterprise organizations.in accordance with the regeneration aims of the TAAP and in the broader operational context, the Councils Voluntary Organisation Compact.

5.0 Summary Description

Phase 2 is an application for the refurbishment and additional accommodation for the existing site buildings, namely:-

- The Superintendents House, known as the Bath house and at present providing accommodation for HANDS (Help a Neighbour in distress).
- The original pool side Cafe and restaurant building, to provide community meeting, conference, museum, exhibition space and a community, shared office facility allowing hot desking and the provision of offices services. for a number of charity and other social enterprise organisations.
- A reorganisation of the two original public toilets on the site (off the Service Road and Water Lane/Embankment) to provide Disabled Access and improved facilities.
The Water Lane public toilet, could be provided with an upper level for a cafe and viewing terrace.
- All Buildings will be refurbished, have an extra floor added and be provided with lightweight, barrel vaulted roof roofs, reflecting other new buildings along the river in Twickenham. (i.e. The Cafe Building on the Pool site proper and Phoenix Wharf, Eel Pie Island
- An open, viewing terrace will be provided on the upper floor of both the Bath House and the Public Toilets, to provide much requested public panoramic viewing places of the active river landscape within the project.
- More detail structural investigations within the buildings are required to establish the best location of a lift on the site to provide Disabled Access to all levels. However this Application includes a new external lift between Embankment level and Terrace /Pool level. This is accessed via the new Disabled Toilet located in the garage attached to the Bath House.
- A full Area Schedule is provided in the application 12/0719/FUL, together with a diagram illustrating the distribution of spaces.

6.0 Purpose of Application 12/0719 /FUL

This Application is intended to demonstrate that the existing buildings can be refurbished economically, practically, and in doing so, show that such a project will directly assist the regeneration of the area and contribute in the long term to the environmental improvements in and around the Twickenham Town Centre and particularly on the Riverside, outlined in the TAAP relating to the use of parks and civic spaces and environmental improvement schemes

Refurbishment of the existing buildings, and additional accommodation will provide beneficial community office accommodation and usable space for meetings, lectures exercise, demonstration, exhibition and potential museum type space. All of which will help regenerate and uplift as noted in the TAAP.

7.0 The Project in the wider planning context

It is our submission that this Application complies with, will enhance and conform to the spirit and detail of the TAAP proposals and other plan requirements.

Key issues that this scheme answers positively are:-

- It is compatible with improvement of the wider area, including the King St frontage. It is, and could be made even more compatible with the redevelopment of the Car park site (soon to be in the Councils ownership)
- It will enhance the Conservation Area immediately
- It meets the conditions laid down in policy BLT1 and the description of Conservation Area 8
- It will enhance the Thames Policy Area
- It meets the conditions laid down in policy ENV26
- It takes account of the vehicular and other access needs of river users, local Residents and businesses The service road remains as now, and will in the future continue though to Water Lane.
- Determining the future of the site will make a significant contribution to achieving the strategic policies of the Thames Landscape Strategy
- It will directly promote the use and enjoyment of the river and riverside through uses such as public open space, cafés and restaurants.
- It complements the public open space of the Jubilee Garden and will provide the permanent amenity in terms of toilets, cafe and shade.
- It retains the important mature Hornbeam trees on the Service Road
- Clear signposting and plans of the site, and routes through at the entrances so that paths and destinations can be identified.
- Improved public access to the whole of the previous Twickenham Pool site including a new lift from the Embankment to the Terrace level reached via the new Accessible Toilet located in the Bath House garage. This will improve wheel chair access across the site between King Street and the Embankment.
- Provide a new and “modern: extension to the existing buildings, that would add to the importance and scale of the existing building to provide a visual point of reference for the site, particularly when seen from King Street the river and the Embankment.
- The additional floor level and contrasting design aesthetic of the new additions to the " Modernist" brickwork of the existing buildings is intended to pick up upon and show continuity with the cafe building on the Jubilee Garden site , and the successful new development at Phoenix Wharf Eel Pie

Island Studios.

- The materials selected are intended particularly to reflect the attractiveness and “sense of fun” that the Phoenix Wharf, Eel Pie Island development generates. However, in response to public comment we have offered to review materials and colours, but have not had the opportunity to discuss these issues with the Planning Department
- The Inspectors recommendation (**1991 Inspectors Report** - Ref the M&S scheme) for pitch roofs was considered, but the lower profile and more “modern feel of the lightweight barrel vault was considered preferable given the period since that recommendation was made of taking into consideration more recent developments along the river and within the Conservation Area. However, following comments on the Application by the public, the scheme was altered to include pitched roofs.

8.0 Operational Management of the Implemented Scheme.

A previously approved Planning Application, submitted by TRTG, for the site carried a Condition in relation to the future management of the site.

With respect to this Application the clarification submitted was:-

“It is proposed that the implementation and subsequent management of the site would be through a Trust handling the management of the completed project.. In this way the day to day management and maintenance, public access arrangements, integration with development and change on the surrounding sites, security and operational issues can be unified.”

9.0 Conclusion & Submission

TRTG believes, on the basis of the evidence and references set out above in this paper that the **Planning Application 12/0719/FUL by TRTG dated March 2012** satisfies the Planning and other requirements set by the Council, and that this Application should, following a meeting with Officers to resolve amendments and modifications that we have offered, now be considered by the Planning Committee of Richmond Upon Thames Council, and a favourable decision should be issued

Yours faithfully

Martin Stearman Dip Arch, BTp, Pg TCP RIBA & TPI Retired
CC Ronald Chappell C.Eng F.I.Struct E & TRTG Committee