

To: David Barnes, Philip Wealthy and Cllr Malcolm Eady Date: 4 November 2007

**DRAFT PLANNING BRIEF FOR GIFFORD HOUSE** – prepared for and agreed on behalf of Gifford House Action Group, Grange Avenue Residents’ Association, Strawberry Hill Residents’ Association, Friends of Twickenham Green and the Twickenham Society.

*This is an example draft Planning Brief which has been drawn up by residents as a basis for discussion between the Council and the local Community. The draft uses housing as an example for a Planning Brief. This should not be taken to limit the site to one use. It could be used for community use, such as accommodation for the elderly. Pre-planning discussion between the Council and the Community is recommended in accordance with Government Planning Guidelines.*

## CONTENTS

- 1.0 INTRODUCTION
- 2.0 ANALYSIS OF SITE AND SURROUNDINGS
- 3.0 PLANNING POLICY FRAMEWORK
- 4.0 SITE STRATEGY
- 5.0 PLANNING APPLICATION DETAILS
- 6.0 SUSTAINABILITY APPRAISAL

## APPENDICES

Appendix 1 Twickenham Common (Boydell, 1753)

## 1.0 INTRODUCTION

1.1 Gifford House fronts onto Twickenham Green. The site is a former residential care home for the elderly and was closed down in October 2004. The freehold of the site is owned by the Council. Care UK entered into a 25 year lease in 2001. This Planning Brief provides guidelines for the future development of this site, in line with the Unitary Development Plan First Review: <http://www.richmond.gov.uk/finallbrlds.pdf>

No.	SITE	PROPOSAL	JUSTIFICATION
25	GIFFORD HOUSE	see Note	Development to respect Conservation Area

## POPES AVENUE

Note: The draft uses housing as an example for a Planning Brief. This should not be taken to limit the site to one use. It could be used for community use, such as accommodation for the elderly. Pre-planning discussion between the Council and the Community is recommended in accordance with Government Planning Guidelines.

1.2 The Council considers that there is the opportunity at the site to deliver an exemplary scheme to meet needs in the Borough and demonstrate the Council's commitment to high quality design.

1.3 The Brief was prepared on 4 November 2007. Any proposal for the site will be required to have regard to this guidance, which will be a material consideration in determining any planning applications.

## **2.0 ANALYSIS OF SITE AND SURROUNDINGS**

2.1 This site is in a prominent location on one of the main routes into Twickenham town centre. It is also a key route to St Margarets, Richmond, Kew, Barnes, Teddington, the Hamptons and Whitton. Within a Conservation Area, Gifford House is visible from Twickenham Green which has Green Flag Status and located between Buildings of Townscape Merit and a Grade II Listed church. It is a highly sensitive and constrained site. Any redevelopment proposals will have a significant impact on the character and appearance of the surrounding historic landscape and will have to be of the highest design quality in keeping with surrounding height and massing.

### **Historic Development**

2.2 The land occupied by Gifford House was previously the garden of a handsome Twickenham mansion with recorded origins going back to the late seventeenth century. The appearance of the house was celebrated in the engraving by Thomas Boydell in 1753. It is shown standing next to its neighbour Twickenham Grange facing Twickenham Common (see Appendix 1). Its illustrious former owners over the centuries include the first Earl of Strafford, who negotiated the Treaty of Utrecht, Lady Eleanor Holles who founded the famous school for girls, Sir Chaloner Ogle, Admiral of the Fleet and Ruler of the King's Navy and Dorothea Jordan, the famous actress and mistress of the Duke of Clarence, later William IV. The house was acquired by the Council under wartime powers as a day nursery. By 1963 it was occupied by squatters, caught fire and was demolished. For further information see the Twickenham Museum website: <http://www.twickenham-museum.org.uk/detail.asp?ContentID=370>

The development of the Gifford House site provides the opportunity to recreate one of Twickenham's historic buildings and enhance the Conservation Area. An example of a successful reconstruction is on the Richmond side of the river with the Quinlan Terry designed Richmond Riverside Development.

2.3 The site has, in more recent times, been used as residential care home and a temporary library. The site is said to be surplus to requirements and provides the opportunity to enhance the character and appearance of the Conservation Area.

### **Site characteristics**

2.4 The proposed site is ---- square metres.

2.5 The site is set behind a low brick boundary wall. There is a bus stop immediately outside the site. There are mature trees within the site and around its boundary.

2.6 The buildings and structures that remain on this site lie within the boundary of the Twickenham Green Conservation Area.

2.7 Gifford House fronts Twickenham Green, which has Green Flag Status, and stands adjacent to the Grade II Listed Holy Trinity Church and a row of Buildings of Townscape Merit (BTM). The Gifford House site, Holy Trinity Church, BTM and Twickenham Green are in the Conservation Area.

2.8 A number of consultants have surveyed the Gifford House site and their analysis can be found on the Richmond Planning website:

[http://www2.richmond.gov.uk/PlanData2/planning\\_summary.aspx?strWeekListType=SRCH&strAddress=gifford%20house&strLimit=50](http://www2.richmond.gov.uk/PlanData2/planning_summary.aspx?strWeekListType=SRCH&strAddress=gifford%20house&strLimit=50) Reference: 07/0658/CAC and 07/0597/FUL

Reports are available for the following:

Conservation Area Statement

Archaeological Desk Statement

Arboricultural Survey

Habitat and Protected Species Survey

Report on Contamination.

Care should be taken with some recommendations in these reports, e.g. tree removal and contamination. Amended reports will need to inform any proposals that come forward for the site.

### **Constraints**

2.9 There are a variety of constraints, which need to be taken into account in considering the future development of the site:

- Given the importance of the setting of this site and the historic interest of the surroundings any development will have to preserve and enhance the character and appearance of the Conservation Area. In particular any proposals will need to have regard to the following:

The impact on the landscape quality and character of the Conservation Area including Twickenham Green, the Grade II Listed Church and Buildings of Townscape Merit. Consideration will need to be given to views from Twickenham Green, from all angles including First Cross Road, roads on the North side, and on the South side. Any proposals will need to have regard to the nature and characteristics of the surrounding development, in particular building lines, scale and massing, its relationship with the street and the nature of boundary treatments.

- The maximum height of any new development should not exceed the height of the present building, excluding the water tower.
- The designer should consider the merits of stepping down in order to respect the modest height of the adjacent villas (BTM) to avoid an over dominant presence to the front.
- The present footprint should not be exceeded.
- Any boundary wall fronting the Green should allow an unobstructed view of Twickenham Green from the ground floor.

These are subject to any proposals meeting all the criteria set out in this Brief.

- Development will need to respect the setting of the Grade II Listed Church and the terrace of houses of Townscape Merit, other historic buildings around Twickenham Green and Twickenham Green itself, an open historic public space.
- Any proposals will need to take account of the prominent location of the site within the Conservation Area.
- The potential impact on the enjoyment of the view, protected by the Open Spaces Act 1906, from Twickenham Green will be of particular importance. This will include consideration of the view in the wintertime and the need to demonstrate an appropriate design response to the roofscape and skyline of any scheme.
- There are a number of mature trees within the boundary of the site and these should not be harmed by any proposals.
- Any proposals must look to deal with highway matters in a positive way as part of an integrated urban design approach. The present vehicular access point is extremely inadequate. Popes Avenue is very narrow and heavily parked. The existing access is on a bend close to the main road. (See 4.10)
- The residential amenities of neighbouring properties will need to be taken into account, particularly 29 The Green and 29 Popes Avenue, situated either side of Gifford House, and the town houses in Grange Avenue at the back of the development site. The main living rooms of Grange Avenue are at first floor level in relation to the site, with bedroom windows above. Gardens are generally 10 m deep.
- The avoidance of overlooking is particularly important to provide a neighbourly development and respect the privacy of neighbours.
- There should be no development on the east side of the important pine tree in the middle of the Gifford House site, i.e. no development towards the land used by the existing Contact Centre.
- The site will need decontamination (Recommendations of the Murray Rix Report available on the Planning website:  
<http://idoxwam.richmond.gov.uk/WAM/showCaseFile.do?&appNumber=07/0597/FUL>).

### **3.0 PLANNING POLICY BACKGROUND**

3.1 Plans and guidance of particular relevance to this site are included within:

#### **National and Regional Policies**

PPS1: Creating Sustainable Communities

PPG3: Housing

PPG13: Transport

PPG15: Planning and the Historic Environment

The London Plan

Joint CABE/DETR companion guide to PPS1, 'By Design'

Building in Context (joint EH/CABE document)

#### **Local Policies**

London Borough of Richmond upon Thames Unitary Development Plan: First Review

Twickenham Green Conservation Area Study

Twickenham Green Management Plan

3.2 The key principles encapsulated in the guidance of relevance to the site are as follows:

- Promoting high quality urban design and architecture
- Protecting the character and appearance of Conservation Areas.
- Protecting the setting of listed buildings
- Protecting the character of historic parks and gardens
- Protecting the environment.
- Providing well designed housing which should make a contribution to improving the quality of life to create attractive, high-quality living environments.

#### **Local Planning Policy Context**

3.3 The site is subject to a variety of specific designations within the UDP to which regard should be paid. Whilst all UDP policies apply, attention is drawn particularly to the Council's policies for:

#### **3.4 Built environment**

- The whole of the site is within a Conservation Area and any development should preserve and enhance the character or appearance of the Conservation Area, under the provisions of Policy BLT2.

- The need to preserve and enhance the setting of Listed Buildings, BLT3 and Buildings of Townscape Merit BLT 4
- Matters relating to the design quality of spaces and buildings are covered in detail in BLT 11 and BLT14 respectively. The need to provide adequate levels of accessibility and look at ways of designing out crime at the early stages of a project are covered in BLT12 and BLT 17 respectively.

### 3.5 Housing

Note: The draft uses housing as an example for a Planning Brief. This should not be taken to limit the site to one use. It could be used for community use, such as accommodation for the elderly. Pre-planning discussion between the Council and the Community is recommended in accordance with Government Planning Guidelines.

- Issues relating to residential density in the Borough are covered in detail in policy HSG 11, which also requires development of this nature to provide at least 25% small units.
- As outlined in Policy HSG 6 the Council will expect the provision of 40% affordable units on sites capable of providing 10 or more units (or 0.3 ha or more) to include both social rented housing and housing for key workers and shared ownership.
- Policy HSG 8 requires 10% of housing to be designed for wheelchair housing on developments of more than 10 units. (The designated units should be shown on any plans, with turning circles and dimensions clearly shown to demonstrate that our supplementary planning guidance on Design for Maximum Access has been taken into account).
- The Backland and Infill Development (HSG 12) and Quality of the Residential Environment (HSG 17) policies are also relevant.

3.6 Proposals at the site will also be considered in the context of the following Supplementary Planning Guidance/Document:

Design Quality  
 Small and Medium Housing Sites  
 Conservation Area Study for Twickenham Green  
 Affordable Housing  
 Planning Obligations Strategy  
 Buildings of Townscape Merit - Guidance  
 Recycling for new developments  
 Redevelopment of potentially contaminated sites  
 Security by design  
 Trees: Legislation and Procedure  
 Draft Sustainable Construction Checklist

## **Design Guidelines**

Historic Buildings

Nature Conservation and Development

Trees: Landscape Design, Planting & Care

3.7 There are planning opportunities close to the site and these are identified in Section 4.

### **4.0 SITE STRATEGY**

4.1 The intention of this Brief is not to prescribe a particular approach to the site, but rather establish the parameters within which to develop a design response and against which the quality of a scheme will be judged. The Council will require the submission of a Design Statement which should include a comprehensive site analysis and explanation of the site response and evolution of the scheme. Proposals will need to respond positively to the constraints listed in Section 2 and develop a site-specific response, which celebrates the inherent qualities of the site.

4.2 The aim of any proposals should be to set a new standard for schemes in the Borough. Any development on this site will have to be of the highest urban design and architectural quality commensurate with its prominent position on key routes into Twickenham town centre, St Margarets, Richmond, Kew, Barnes, Teddington, the Hamptons and Whitton. This will need to influence all aspects of the design from site planning to the detailed design and materials of the buildings and open spaces. Any future development on this site will have to respond sensitively to its historic and landscaped surroundings to provide an appropriate design. The aim is to create a true sense of place that is distinctive and specific to Twickenham Green.

4.3 The acceptability of any scheme will depend on its detailed design and on it being of the highest design quality. Any element of the scheme, which exceeds the height of the present building (excluding the water tower) will be inappropriate.

4.4 Any proposals will have to provide an inclusive environment and this will need to be reflected in the mix of units and type of accommodation provided as well as ensuring the scheme is fully accessible. The Council will expect the submission of an accessibility statement.

4.5 The landscape proposals for the private and public space will need to be considered from the outset as part of a comprehensive site response. The scheme will need to consider the amount, siting, orientation and design of amenity space for residents. There will need to be a clear distinction between public and private spaces. In line with Council policy well-designed refuse and recycling storage will need to be provided as an integral part of any design proposal.

4.6 Issues relating to crime and security will need to be considered from the outset to form an integral part of the design proposals rather than be considered as ‘add-ons’ at a later date.

4.7 The developer will need to provide details of correspondence with all the utilities to ensure there are no problems peculiar to this site. In particular the developer will need to provide details of anticipated dwelling numbers, flow rates and foul water flow rates to Thames Water. Surface water will need to drain to the ground, watercourses or surface water sewer and not to the foul sewer. The council encourages water efficiency measures and will look for the use of permeable hard surfacing where possible; further information can be found direct from the Environment Agency National Water Demand Management Centre (<http://www.environment-agency.gov.uk> ) or the Thames Water website: [http://www.thames-water.com/waterwise\\_](http://www.thames-water.com/waterwise_).

### **Opportunities**

4.8 This important site generates key opportunities, which any proposals should address:

- To design a site-specific response that reflects best practice and will add to the rich heritage of quality architecture that can be found throughout the Borough.
- To enhance the character and appearance of the Conservation Area including the street scene along Twickenham Green as well as the relationship with the surrounding area.
- To promote best practice in terms of a design approach which embraces principles that look to minimise the environmental impact of development at the outset of the design process. It should be an integral part of the design process and seek to reduce energy consumption. This should form the basis for the site planning and layout and could inform an original and logical architectural response. The proximity of the site to the public transport facilities in central Twickenham should be used positively to give people the choice of using public transport.
- There is an opportunity within the existing building line to introduce an active frontage maximising the number of windows onto the street not only to contribute to the architectural qualities of the proposals but also to provide passive overlooking of the public space. An inward looking scheme that turns its back on the public realm will not be acceptable.
- There is an opportunity to enhance the pedestrian experience along Twickenham Green and within the whole Conservation Area.

### **Transport**

4.9 The sensitivity of the location means that the any access road, car parking areas and secure and covered cycle storage will need to be carefully sited and designed to the highest standard to form part of the overall landscape strategy.



4.10 Provision of adequate vehicular access will require improvements. Present access arrangements into and within the site are unsatisfactory. Popes Avenue is narrow and heavily parked; the existing access position is next to a bend in this road. The junction radii now appear sub-standard and there is limited visibility in the south-eastwards direction; all of which will result in increased hazards to traffic at this junction. (refer to 2.9) A Traffic Impact Assessment is essential.

### **Planning opportunities**

4.11 The Council's Planning Obligations Strategy will apply to any proposals for this site and this document sets out in detail what financial contributions will be expected. In relation to the public realm specific contributions would include those towards improvements to local footpaths and roads outside the site.

4.12 The Council will work with developers to ensure that any redevelopment scheme:

- accords with planning policy requirements
- addresses the site constraints and maximises potential opportunities
- is viable and commercially deliverable
- **has the support of the local community after full and proper consultation**

## **5.0 PLANNING APPLICATION DETAILS**

5.1 The Council will accept an outline planning permission for the development of this site. However, in support of a full planning application, the Council will require the submission of the following information:

5.2 A Design Statement showing how the proposals have resulted from a response to the qualities of the site and its surroundings. This will need to include a thorough site analysis, clear explanation of the design response to the site and of the evolution of the scheme itself. It will also need to illustrate how the scheme has been designed within the constraints identified in section 2.

5.3 In accordance with the relevant regulations, regard will also need to be given to whether an Environmental Statement is required to support a planning application.

## **6.0 SUSTAINABILITY APPRAISAL**

Legal requirements

6.1 Under the Planning and Compulsory Purchase Act 2004, sustainability appraisal (SA) is mandatory for Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The SA will incorporate the requirements of the Strategic Environmental Assessment Directive through the carrying out of a single appraisal process.

6.2 In order to test that the objectives of this draft Planning Brief are in accordance with sustainability principles they have been tested for compatibility with the Council's Draft SA objectives (See Table 1). A draft framework for assessing possible sustainability implications is set out in the Draft Sustainability Scoping Report, shortly due out for consultation. For more information please use the following link:

[http://www.richmond.gov.uk/home/environment/planning/local\\_development\\_framework/sustainability\\_appraisal\\_ldf.htm](http://www.richmond.gov.uk/home/environment/planning/local_development_framework/sustainability_appraisal_ldf.htm)

6.3 The strategy for Gifford House takes account of these SA objectives and the Council will require the submission of further detailed information and studies as set out in Paragraph 6.1 in support of an application for planning permission, that provide a BREAAAM rating "Excellent".

**Table 1:** Appraisal of SPD against Draft SA objectives (Objectives taken from the Draft Sustainability Appraisal Scoping Report) impact of SPD

#### **ENVIRONMENTAL**

1. To promote sustainable waste management, including reducing waste and waste disposal, promoting recovery, reuse and recycling.
2. To make the most efficient use of land and to reduce contamination and safeguard soil quantity and quality.
3. Reduce air and noise pollution, including greenhouse gases, and ensure air quality improves.
4. Minimise congestion and pollution by reducing the need to travel, encourage alternatives to the car and making best use of existing transport infrastructure.
5. To maintain water quality and reduce the risk of flooding.
6. To promote sustainable energy use through improved energy efficiency, reduced energy use and increased use of renewable energy.
7. Conserve and enhance biodiversity avoiding irreversible losses, through responsible management of key wildlife sites.
8. Promote high quality places, spaces and buildings and conserve and enhance the landscape and townscape character of the borough including historical features for the benefit of both residents and visitors.
9. To make best use of previously developed land and existing buildings, encouraging sustainable construction practices.

#### **SOCIAL**

10. To create and maintain safer and more secure communities.

11. To facilitate the improved health and well-being of the population, including enabling people to stay independent and ensuring access to those health, education, sport, leisure and recreation facilities and services that are required.

**ECONOMIC** (see 6.12)

12. To increase the vitality and viability of existing town centres, local centres and parades.

13. To promote and encourage a buoyant and diverse economy that will provide sustainable economic growth.

14. To provide appropriate commercial development opportunities to meet the needs of the local and sub-regional economy.

**Environmental Considerations**

**Health and well-being**

6.4 Well-being will be enhanced through public safety improvements (see creation of Safer Communities below) and general improvement of local environment.

**Conservation and enhancement of biodiversity**

6.5 The site is currently part hardstanding. The proposals should increase areas of soft and green landscape that will add to the biodiversity of the site and protect existing trees and shrubs and add to their stock.

**Preservation and enhancement of landscape**

6.6 The Brief requires all proposals to be of the highest urban design and architectural quality in Para 2.1.

6.7 The Brief recognises at Para 2.7 that the site is within a Conservation Area and that any development should preserve or enhancement the appearance of the Conservation Area.

6.8 The Brief requires any proposals to have regard to the rich history of the Gifford House site in Para 2.2

6.9 The need to improve the quality of open spaces is recognised as a key opportunity from the Brief (Para 4.5), which requires this to be an integrated part of the design response.

**Sustainable energy use and waste management**

6.10 The proposals would be subject to the policies of the UDP First Review and subsequent LDF in these respects. Para 4.8 explicitly refers to sustainable energy matters

in relation to the potential to generate an architectural response, and 4.5 to the design of refuse and recycling facilities.

### **Traffic congestion and pollution**

6.11 Parking provided on site must be for residents only. The site is close to the public transport infrastructure of central Twickenham. PTAL for this site is high.

### **Creation of safer communities**

6.12 The introduction of further residential accommodation on this site will increase levels of passive overlooking as noted in Para. 4.8.

### **Other matters**

6.13 It is not considered that the Brief will have significant implications in relation to matter such as vitality and viability of town centres, promotion of a buoyant and diverse economy or provision of commercial development opportunities.