



Statement of Disagreement

Site: Arlington Works, 23 - 27 Arlington Road,
Twickenham, TW1 2BB

LPA reference:18/2714/FUL

Appeal PINs reference: APP/L5810/W/20/3249153

1. Introduction:

- 1.1 This Statement of Disagreement between Sharpe Refinery Service Ltd (“the Appellant”) and the London Borough of Richmond upon Thames (“the Council”) sets out the areas of disagreement relating to Planning Appeal ref. APP/L5810/W/20/3249153 against the Council’s refusal of a planning application for the:

“Redevelopment of the site to provide 610sqm of commercial space (B1 Use Class) within existing Buildings of Townscape Merit plus a new build unit, 24 residential units in two blocks (5 x 1 bedroom flats, 12 x 2 bedroom flats and 7 x 3 bedroom flats) and associated car parking and landscaping and other works.”

- 1.2 As advised by the Inspector, this statement has been subject to involvement with the two other Rule 6 parties.
- 1.3 It is the intention, as directed by the Inspector, that this Statement is used prior to the Inquiry to guide discussions to resolve as many areas of disagreement between the parties as possible.

2. Areas of disagreement

2.1 *Possible implications for a designated waste site:*

- Whether the prevailing safeguarding policy requirement to provide compensatory capacity can be interpreted to allow such capacity to be:
 - a. located outside the West London Plan Area; and/or
 - b. deal with a different type of waste to that it is intended to replace particularly when dealing with hazardous waste; and/or
 - c. offer significantly less capacity to that it is intended to replace.
- Whether the prevailing safeguarding policy requires compensatory capacity to be identified at the time release from safeguarding is sought.
- Whether the area of an existing waste site is relevant to the application of the prevailing safeguarding policy.
- Whether viability of an existing waste site is relevant to the application of the prevailing safeguarding policy.
- Whether suitability of an existing waste site for further waste development is relevant to the application of the prevailing safeguarding policy.
- Whether the host Borough of a safeguarded waste site within the West London Waste Plan area is the sole determining authority to any application for release.

2.2 *Possible implications for industrial and employment policy:*

- Whether the marketing required by policy LP42 was carried out.
- Whether the scheme complies with the sequential approach contained in LP42.
- Whether it is appropriate to protect industrial and employment land.
- Whether Class E is relevant to this case.

2.3 *The effect of the development upon the character and appearance of the appeal site and the surrounding area, and including any implications for the significance of non-designated heritage assets:*

- Whether the Layout, Height, Scale and Massing of the proposed development is contrary to the NPPF, NDG, and Policy LP1, Design Quality & East Twickenham Village Plan SPDs.

- Whether the proposed development reflects the character of the surroundings in terms of its scale and appearance and the compliance to the NPPF, NDG, LP 1 and LP 39 and Design Quality & East Twickenham Village Plan SPDs.
- Whether the impact of the proposed development on the setting of Buildings of Townscape Merit is contrary to the NPPF, NPPG, NDG and policy LP4 and whether it would be harmful to the significance and setting of the non-designated heritage assets.

2.4 Whether or not the scheme would provide adequate off-street parking, and including any associated implications arising from the scheme for the free and safe movement of vehicles, pedestrians and other road users in the vicinity:

- Whether the scheme would lead to vehicle overspill parking on surrounding streets contrary to policy LP 45.
- Whether the proposal would lead to vehicles that currently park south of the proposed access road from being displaced and whether a vehicular parking stress survey has been submitted to show that these vehicles can be parked on streets within 500m walking distance of the site.
- Whether the appellant has demonstrated that they have control of the land south of the access road outside of their red line to enable them to make motorists using the area to park to do so parallel to the carriageway.

2.5 Whether or not the proposal would make adequate provision for affordable housing:

- Whether the proposal complies with policy LP36 of the Local Plan which requires 50% affordable housing with a tenure split of 80:20 affordable rent: shared ownership unless it is demonstrated through evidence of financial viability that a lesser provision is to be provided.
- Whether the proposed shared ownership homes will meet the Council's affordability requirements for provision of shared ownership homes as set out in the Intermediate Housing Policy Statement.
- Whether there has been engagement with Registered Providers to ensure that the affordable housing best meets Richmond's priority housing need.
- Whether there has been exploration of the potential for use of public grant (both from the Mayor of London's Affordable Housing Programme and from the Council's Housing Capital Programme) to enhance scheme viability and thereby improve the affordable housing 'offer' to better meet the Council's stated priority affordable housing needs.
- Whether it has been demonstrated that the design and/or management of the scheme can enable inclusion of homes (both for affordable rent and shared ownership) that would comply with the Council's planning and housing policies.

2.6 Whether or not the scheme would provide an appropriate mix of uses:

- Whether the proposed mixed-use development is appropriate for this site.
- Whether the co-location of residential and commercial uses would lead to a conflict between users, and impact on the proposed commercial use operation and the safety/amenity of proposed residential occupants.
- Whether there is sufficient evidence to demonstrate that the scheme will maintain sufficient space on the shared space carriageway to allow a car to pass a heavy goods vehicle carrying refuse or recycling safely.

2.7 Possible implications of the scheme for Co2 emissions:

- Whether the scheme complies with Policy LP 22 of the Local Plan and achieves zero carbon standards in line with London Plan policy.
- Whether a zero-carbon payment to offset the surplus emission the development would produce over a 30-year period has been provided in line with Policy LP22.

2.8 Whether or not the proposal would make adequate provision for on-site children's play space:

- Whether the adopted policy and guidance allows for financial contributions towards off-site play space provision where site constraints prevent on-site provision.
- Whether the site is well served with parks and gardens which contain play space within reasonable walking distance.
- Whether a financial contribution towards the off-site provision of play space within a nearby park/open space to make up any identified and reasonable deficiency could be secured by a Section 106 obligation.

2.10 Any implications arising from 5-year housing land supply and related matters:

- Whether the current London Plan targets (adopted 2016) provides for sufficient housing to meet London's identified housing needs.
- Whether the Intend to Publish version of the New London Plan (December 2019) provides sufficient housing targets to meet London's identified housing needs.
- Whether there is an unmet housing need in LB Richmond.
- Whether the LB Richmond can provide a five-year housing land supply against the Intend to Publish London Plan housing target of 411 dwellings per annum.