

Planning Application 09/0914 /FUL: Re-creation of use, and hard and soft landscaping to Twickenham Pool Site

RESPONSE DOCUMENTS to Planning Letter and EA comments of 19 October 2009

Please note that for clarity the letter from Planning and comments and report from the EA are presented here in Times Roman font whilst our responses are presented in Arial font.

We have also taken this opportunity to provide additional information to allow the Application to be considered

Planning Letter

Design:

Redevelopment of the proposal site is something supported in design terms given its present state. The current application however only deals with part of the site and therefore it is difficult to determine whether the scheme would meet the requirements of Proposal Site T1. To ensure a high quality of design it is considered necessary that the site be dealt with comprehensively.

RESPONSE: The current application deals with the remaining part of the former swimming pool site not improved in 2004. This Application does not inhibit proposals for the remaining area of the T1 site

Within this application the improved area of the Playground and Jubilee Garden will be retained in their present form.

It is understood that the Embankment is already included in the Arcadia proposals and consequently no proposals for the Embankment are included in this Application.

In preparing this Application consideration has been given to the wider context including the entire T1 site.

As is indicated above a fundamental component of the TRTGG approach has been that the rear (and perhaps all) of the King Street properties should be redeveloped including a new pedestrian route through to the riverside. Attached Sketch 1 illustrates one approach (Appendix J to Profs of Evidence submitted to the Twickenham Riverside Inquiry Feb 2004)

We submit that following the Councils commissioning and publication of the **nef** Report proposals will come forward in the future for the regeneration of the town centre, i.e. for those elements of site TP1 not covered by this application.

This scheme would facilitate the achievement of the **T1 Site Brief**, the **UDP** and the **Twickenham Town Centre nef** Report in the following ways, and is therefore “comprehensive” and of high quality in relation to wider proposals:-

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- It complies with the Richmond upon Thames Unitary Development Plan review Modifications Inspector's Report Final Version Chapter 11 LOCAL AREAS: TWICKENHAM 129 RECOMMENDATIONS 11.163. I recommend that the Proposal be modified by D/T1/3 and that the justification be modified by:
 - (i) The restoration of the requirement to provide public conveniences;
 - (ii) The deletion of reference to the Arcadia in the City project;
 - (iii) More explicit emphasis on the provision of public open space as the predominant feature of any redevelopment scheme; and
 - (iv) The requirement that the planning brief for the redevelopment of the site indicate
 - (a) the extent of the public open space to be provided, which should be immutable irrespective of the time scale of any proposals; and
 - (b) the characteristics of the Conservation Area which justify its designation and to which new development should have regard.
- The proposals will comply with the T1 brief requirement of principal use as open space and provide the necessary provision of public open space for the large area of housing and flats situated on King Street. The area between King St and the railway is noted on the UDP proposals map as poorly provided with public open space. This site will provide this amenity in accordance with CP10 as a park of less than 2Ha.
- At the same time creation of this park will ensure that possible future development to rejuvenate the Town centre will be balanced in terms of amenity.
- The open space within the scheme can be accessible from King Street in the future and will not impede any future development of King Street as envisaged by the recommendations of the **nef Report 2009** :-
 - The Riverside needs "a stronger link (into the town centre and vice versa to the riverside) creating an attractive pedestrian route... and be part of an overall strategy".
 - Opening up the Riverside and develop "an organic plan that would make the best use of the site".
 - River is glorious but sorely neglected gives character to the area which could be expressed.
 - Become the centre of "an overall shared vision" taken forward by the Council, answering the "urgent need for a Town Centre Strategy which must be part of the LDF as a supplementary planning document"
 - "Raise the profile and image of Twickenham Town Centre and... provide a Quality Environment "
- It will open up the views to the River by providing the amenity of an elevated open space free of obstruction with views up and down the River Thames.

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- The uses shown will enhance the Conservation Area and Thames Policy Area by maintaining the scale and character of this part of the riverside Ref. (Ref Planning Inspector Report 1982, and the UDP Report 2004)
- It would make a significant contribution to achieving the strategic policies of the Thames Landscape Strategy, by conserving and restoring a public amenity, which is adjacent to the Thames Embankment.
- Its objective is to promote the use and enjoyment of the river and riverside by making the whole area more amenable, user accessible and attractive to the public.
- Provide better views and facilities for open air exercise and enjoyment for all the family encouraging public recreational use of both the site and the River.
- It will as a consequence help regenerate Twickenham Town Centre by acting as a focal point for community activity.
- It provides and extends for the whole community the present popular amenity that exists for children parents and grand parents through uses such as public open space, a town square, recreational use, community recreational activity picnic area, open air sport, toilets, café and restaurant.
- A public open space forms the most important element of the scheme, It is the guiding principle that will revitalise this area, bringing people, life activity and amenity to a unique open space on the banks of the River Thames neglected and denied to public use since 1982.
- The future development of the rear of the King Street properties could provide the increase in residential not provided on this site.
- The service road to the rear of King Street will continue to provide vehicular Access to the site and will continue to service premises in King Street.
- The opportunity to make limited improvements to servicing King Street premises, will occur in the future when the King Street block is developed in line with the proposals outlined in the NEF Report Feb 2009. This can include the disused Car Park at the end of the present Service Road
- Important trees are retained. In addition this is an opportunity to increase the flora and fauna by planting new trees, flowering shrubs and flower borders. Public gardens have a long tradition of providing a local attraction for both young and old
- The short term schemed implemented by the Council, has been an unqualified success. Now is the time to improve on that success by allowing this application to go ahead bringing community recreational use, life and activity to this site. Twickenham and its community need this amenity used by the people and protected for the benefit of future generations, and for the life vitality and well being of the Town.
- An approval for this scheme would demonstrate a joint Initiative with Community organisations.
- The expanded and improved Riverside Site which, when linked to Town Centre could increase the reasons for visiting Twickenham.

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Additionally it is noted that the information submitted with the application is not considered to include the level of detail required of a site within both a conservation area and Thames Policy Area.

- Detailed drawings (plans, elevations) of all existing and proposed buildings and structures must be provided to enable assessment.

RESPONSE: The application is for the landscape treatment of the remaining Pool area. No detailed proposals regarding the buildings are made at this stage, but would be made following investigations once access was made available.

- Further information with respect to materials and finishes must be provided.

RESPONSE: See attached Schedule- Details to be the subject of Conditions

- Detailed information with respect to the refurbishment of the existing buildings on site to be retained must be provided. It is considered that these buildings may not be of sufficient quality to warrant retention. Justification for retention of these buildings must be provided.

RESPONSE: As discussed with the Development Manager when the Application was submitted the buildings are to be considered later following investigation and survey. The buildings were excluded from the application. We are not aware of any requirements on an applicant to justify the retention of buildings in a conservation area

- Detailed information with respect to the proposed hard and soft landscaping, including a schedule of plants must be provided.

RESPONSE: See attached Schedule- Detailed working drawings to be the subject of Conditions.

- Concerns have been raised with respect to the isolation of the site, particularly the proposed arena/theatre, and the limited surveillance provided by the scheme over such.

RESPONSE: This has been addressed. The arena area has been omitted

- There seems to be an excessive use of hard paving within the scheme.

RESPONSE: This has been addressed. The arena area has been omitted and replaced with an open grass area. The low surrounding wall to the arena have also been omitted

- The additional bulk proposed to be added to the front of the baths site 'additional café/restaurant building' restricts views between the site and the Thames and would clutter the proposal site.

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RESPONSE: This has been addressed. The “future facilities” building have been omitted and the proposed Band Stand area relocated to provide more open aspect.

Neighbouring amenity: There are a number of residential properties within close proximity of the application site..... existing background noise generated and estimated noise generated by the use of the facility.

RESPONSE: This has been addressed. The amphitheatre has been omitted replaced by grass area of public open space

Highways and transport: The application at present makes no reference to highway and transport implications.

To ensure that the highway network can adequately accommodate the additional traffic generated by the scheme, the applicant needs to provide a Transport Statement outlining the potential impact of the scheme on the local highway network. This will need to address servicing of the site, trip generation and construction methodology.

RESPONSE: Transport Statement

The proposal does not include any significant traffic generation elements.

Visitors to the site will be expected to use the parking and access routes by foot and cycle in accordance with LB RuT policies as for any other Borough Park

We consider that the servicing of King Street to be a subject for a development master plan. The use of this site by the public will be a boost to the towns’ visitors, and needs to be considered in this context. As part of the wider development of the T1 site.

We would seek the co-operation of the Council in relation to records and assessments of traffic activity made at the time of their Planning Application for the present children’s playground. There will be records kept if this particular aspect has proved a problem. Consideration of this information needs to be made as to the effect the present amenity has had on the traffic flow and trip generation at this location during the past 5 years. This is a matter that requires consideration of the facts known and a rational approach, because of this sites proximity to the town and local shops and alternative parking there may well be no additional traffic generated.

Other more detailed comments:

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- Further details are also required with respect to the proposed car parking and sightlines must be provided in accordance with Supplementary Planning Document 'Front Garden and Other off Street Parking Guidelines' available on our website.

RESPONSE: The previous approved application only included one parking space and one unloading space- no additional demand is considered necessary however we suggest details to be subject to Condition and discussion at Detail Design stage

- The loading bay appears to be obstructed by the proposed refuse storage area. Tracking curves need to be shown on plans to demonstrate that a vehicle can access the bay whilst a car is parked. These too will require sightlines.

RESPONSE: Details to be subject to Condition and discussion at Detail Design stage

- All ramps will need to be compliant with our Guidance for Design for Maximum Access.

RESPONSE: The proposed ramps is of not more than 1:15 slope which is within the "Guidance " and has a ramp width of 2.2 plus m. Further details to be subject to Condition and discussion at Detail Design stage

Sustainability: No information has been provided with respect to sustainability. The scheme would therefore fail to comply with the requirements of Core Strategy CP1 and the Sustainable Construction Checklist.

RESPONSE: The SCCL appears to non applicable to a proposal for a landscape park which is the principle component of the present application.

Sustainability issues in relation to the landscape proposals are addressed in relation to EA comments below. The existing buildings will be surveyed to determine if they are suitable for refurbishment. A subsequent application will be for the sustainable reuse of existing buildings. Any new construction will comply with the terms of the SCCL where and if applicable, and will incorporate energy saving measures such solar heating and power generation panels all subject to Detail Design and Condition.

Responses to EA letter of Objection

RESPONSE:

As a general point, and on the basis of what we understand of EA policy we would have imagined that the EA would be supportive of any landscape scheme and detailed Landscape Management Plan (subject to condition) that will provide the following:-

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- A public open space and is designed to meet a conservation criteria
- Does not propose any future building to be within 16 m of the watercourse.
- reflects the special character, in terms of height, scale, and quality, enhancing rather than detracting from the River landscape and recognizes that the River wall and adjacent riverside is all part of the River Thames Corridor with the river designated as a site of Metropolitan Importance (SMI) by the London Ecology Unit (LEU)
- Seeks to protect restore or replace the natural features and character of the area.
- Consist of locally appropriate species. Selected in line with the environment and climate of the upper tideway.
- Consideration of habitat enabling and natural decolonisation on parts of the site in addition to new landscaped areas.
- Planting of native species only in order to benefit wild life and help maintain the regions natural balance of flora and help prevent spread of invasive alien species
- Give careful consideration of lighting along River edge and no overspill on to foreshore area.
- Build in nesting and roosting sites.
- Tree and shrub removal minimised
- Pruning retained trees protected during construction
- Avoid nesting season March to August (Wildlife & Countryside Act 1981)
- Inspect trees for Bats before felling Bats Protected under Wildlife & Countryside Act 1981 Inform English Nature if found.
- Includes a sustainable urban drainage system for landscape features and irrigation.
- Restrictions on discharge of water from site Care exercised when increase in permeable area.
- Permeable surfacing allows rain water to filtrate through the surface and sub grade filter out pollutants
- Porous paving will help to maintain the water dynamics at this location
- Ensures that there is no net loss of flood storage volume based on min flood defence level of 6.02 m above OD Newlyn
- No storage of materials within 8m of watercourse

Objection 1: Flood risk

The application site lies within Flood Zone 3a, defined by Planning Policy Statement 25 as having a high probability of flooding. Paragraph E9 of PPS25 requires applicants for planning permission to submit a FRA when development is proposed in such locations.

In the absence of an acceptable Flood Risk Assessment (FRA) we object to the grant of planning permission and recommend refusal on this basis for the following reasons.

Reasons: The FRA submitted with this application does not comply with the requirements set out in Annex E; paragraph E3 of Planning Policy Statement 25 (PPS25). The submitted FRA does not, therefore, provide a suitable basis for assessment to be

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made of the flood risks arising from the proposed development. In particular, the submitted FRA fails to:

1. Consider the effect of the proposals on the flood defences, which form part of the development site, by the proposals. In particular, we object to the new balcony area which projects over the flood defence.

RESPONSE: When constructed in 1934 the present flood defence wall formed the rear ground floor reinforced concrete retaining wall of a two storey steel framed concrete and masonry clad building that was the changing room for an open air swimming pool. The new balcony at its location on Drg 12 is designed to bear on the vertical stem of that RC wall, and will be anchored to the existing pool wall. The load that the new projecting balcony places on the retaining wall is local and less than the storey height of brickwork plus floor and roof loading vertical loading the wall was originally designed for. We understand that the minimum flood defence level is 6.02 m above OD Newlyn. Given the above, and that structural calculations could be provided to demonstrate the structural capacity of the flood wall, we would ask the EA to reconsider their objection to the balcony

- 2 Demonstrate how the surface water run-off from the development will be managed.

Furthermore, it is unclear from the plans and proposal development description what is proposed in terms of the use of buildings on the site, and also if the 'future associated buildings' form part of the planning application. We would like this to be clarified because it may have some implications for the flood risk assessment.

RESPONSE: The Future Facility building has been omitted. Surface water run off will be improved and controlled by extensive use of permeable paving and grassed areas. The existing reinforced concrete pool has been filled with what is presumed to be unclassified fill. This will be removed; the existing pool drainage system investigated with the help of Council records and the restoration to ground level will be with compactable fill, with a layer of topsoil to allow a large green area for public use, picnics ball sports etc.

The existing run off would be maintained. If necessary the run off can be supplemented by coring weep holes through the Embankment flood defence wall. The drainage of all existing buildings remains, as at present and the new bandstand will be connected into the existing drainage system. Flood storage volume will not decrease from its present level. As mentioned elsewhere rainwater harvesting would also be incorporated

Resolution: The applicant should submit a satisfactory flood risk assessment in line with PPS25 that considers the points raised above. We have provided further advice below:

1. Proposals for structures near a flood defence may affect its structural attributes and can, therefore, create additional flood risks. For instance, we would not support proposals for a new

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cantilevered balcony over the flood defence wall as it is likely to increase the loads on the defence wall and result in an encroachment into the functional floodplain.

RESPONSE: See note above. We are unsure what form of “encroachment” the EA envisage will take place? No new structures are proposed other than the ramp included on accessibility grounds.

2. New developments can result in an increase in surface water run-off, which in turn can result in increased flood risk both on site and elsewhere within the catchment. The surface water system should be designed to limit the run-off from the site to that which currently exists, reducing the rate to greenfield (typically 8l/s/ha) where practicable. It should also be in accordance with the requirements of the London Plan policy 4A.14, which further requires a significant reduction in run-off rates leaving the developed site.

RESPONSE: The above requirements would be satisfied. The new development in terms of building is limited to an extended cafe at C and the bandstand .The drainage of the existing Cafe is either into the existing site drainage or to an existing soak away.

The drainage of the bandstand contained within the sustainable drainage system to be designed with the EA requirements in mind.

The applicant should consider controlling run-off at source using sustainable drainage (SuDS) techniques. The Environment Agency would recommend that surface water run-off is discharged to the River Thames by gravity as it is considered a sustainable means of drainage.

RESPONSE: The existing run off to the Thames will remain. There are 3 levels of weep holes to the Wharf lane retaining wall. If necessary this run off can be supplemented by coring weep holes through the Embankment flood defence wall.

Further information on SuDS can be found in:

- PPS25, page 33, Annex F
- PPS25 Practice Guide
- CIRIA C522 document: Sustainable urban drainage systems – design manual for England and Wales
- CIRIA C697 document: SUDS manual
- The Interim Code of Practice for Sustainable Drainage Systems which provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SUDS. The Interim Code of Practice is available on both the Environment Agency's website: www.environment-agency.gov.uk and CIRIA's website: www.ciria.org.uk

It should be demonstrated in the FRA that opportunities to implement SuDS at the site have been maximised and that the following issues have been taken into account:

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- that vulnerable parts of the development are not flooded to the 1 in 30 year plus climate change rainstorm event;
- the surface water design can accommodate any storm event up to the critical duration 1 in 100 year storm event (plus 30% for climate change) for the site;
- The extent of surface water run-off and potential surface water flooding as a consequence of the development, both on and off site. This should be assessed for a 1 in 100 year (plus climate change) rainstorm event.
- Note that whilst the focus within the FRA must be on flood risk management, any SuDS proposed should also seek to maximise opportunities for water quality and amenity benefits.

RESPONSE: These matters are best covered at Detail Design stage and a suitable Condition is invited. There will be consideration of Sustainable urban drainage system for landscape features and irrigation, with restrictions on discharge of water from site. Permeable pavements will be used. Where permeable surfacing allows rain water to filtrate through the surface and the sub grade to filter out pollutants

Best endeavours will be made to ensure there is no net loss of flood storage volume from the present level. Rainwater harvesting will be included as this will also assist in the control of run off rates.

Objection 2: Protection and enhancement of biodiversity

No evidence that the risk to nature conservation from the proposed development has been assessed and addressed satisfactorily. We object to the proposed development as submitted because an insufficient assessment of the risks to nature conservation has been provided and we recommend that the planning application should be refused for the following reasons:

Reasons: The application does not clearly state whether any species of note exist on the area of the site which will be affected by this proposal and if there were be any impact on these species. Government policy on planning and nature conservation as set out in Planning Policy Statement 9 (PPS9) requires that planning decisions should prevent harm to nature conservation interests (PPS9, Key Principles paragraph 1(ii). This has not been demonstrated in the present application. Government policy also requires that planning decisions should be based on up-to-date information about the relevant biodiversity interests of the area (PPS9, Key principles Paragraph 1 (i).

Resolution: We ask the applicant to supply information to demonstrate that the risks posed to biodiversity by the development can be satisfactorily avoided, mitigated or compensated for.

RESPONSE: The need to protect biodiversity is fully recognized.

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The majority of the existing site has been enclosed by a high timber security fence and therefore not been open to the public since 1982.

One of the buildings is still in use the others were last occupied in 2002. As a consequence of this neglect the existing paths walls pools fountains, planting and paved areas which were formerly the pool amenity open space have become overgrown with young trees grass and shrubs mainly Buddleia. Old pathways and paved areas have become damaged and broken up by the uncontrolled growth of vegetation. The following excerpt from The Richmond upon Thames Unitary Development Plan review Modifications Inspector's Report 2004 Final Version is offered as relevant information on Biodiversity:-

"A recent environmental audit of the Swimming Pool site produced for the Council and surveyed in May 2003 shows it to have the ecological value typical of a vacant or derelict site that has been abandoned for about 20 years.

Its physical separation from the Thames floodplain results in there being no riparian habitats or species of note. A similarly commissioned bat and reptile survey undertaken in July 2003 identified no evidence of reptiles within the site. It recommended that provision for bat roosting and hibernation be incorporated in both long-term and short-term redevelopment of the site and that building operations have regard to the protection of birds during the nesting period. Having been commissioned in connection with the current short-term Proposal the survey report foresaw no adverse effect on any protected species. In the light of the survey findings and particularly bearing in mind the character of the beyond the precautions inherent in national planning practice. Important trees should be retained."

This suggests that the risks to species or reduction in bio-diversity will be minimal More up to date information will be provided after permitted access to the site has been obtained. Should any species worthy of conservation be identified the use of the site is a unique opportunity to create a wild garden which will conserve such species for further study and education. We are happy to accept a condition to this effect.

Clearance work will include the pruning and removal of self sown trees and shrubs. The proposals in this planning application will create areas of open space with grass, and areas with permeable paving. There will be a planting scheme to protect restore or replace the natural features and character of the area, it will consist of locally appropriate species, selected in line with the environment and climate of the upper tideway and supplemented by planting to facilitate the sensory design objectives. There will be consideration of habitat enabling and natural recolonisation on parts where feasible on the site in addition to new landscaped areas.

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This will best be affected on an incremental area by area basis with a landscape plan including planting. Amenities such as the scent garden will be a priority. Existing mature trees remain in particular the four number Hornbeams flanking the rear service Road. Planting of trees will be native species only in order to benefit wild life and help maintain the regions natural balance of flora. As a development close to the Thames it will reflect its special character, in terms of height, scale, and quality, enhancing the River landscape. It is proposed to build in nesting and roosting sites.

We are aware of the need to avoid the nesting season March to August (Wildlife & Countryside Act 1981). The need to inspect trees for Bats before felling. Bats are Protected under Wildlife & Countryside Act 1981, and if Bats are found, of the requirement to inform English Nature.

The remaining buildings on the site have been out of use for some time and may potentially be used by bats. The Wildlife and Countryside Act 1981 (WCA) and Countryside and Rights of Way Act 2000 (CRoW) protects bats and their roosts in England. All bats are also listed as European protected species under the Habitats Directive (The Conservation (Natural Habitats, &c.) Regulations 1994). It should also be noted that should there be evidence that a bat has used a site previously, it is protected regardless of whether it is currently occupied or not. The application should assess whether existing buildings are likely to be used by bats so that the impact of any demolition or alterations to these structures can be assessed.

The Phase 1 Habitat survey stated that ‘the Bio diverse environment provides feeding grounds and habitats for traditional riverside wildlife, including bats, which exist in notably heavier concentrations than elsewhere along the riverbank’. Following the 2007 inspection it was written ‘it is considered that the findings in 2003 remain due to the majority of the site remaining dormant for a further 5 years. The biodiversity environment has continued to provide feeding grounds and habitat for traditional riverside wildlife, including bats.’

There are records of bats in the area, including many records of Common Pipistrelles which regularly roost in houses.

We wish to be consulted on the results of any survey submitted in connection with this application, on any design changes, additional mitigation, compensation or enhancement measures that might subsequently be proposed.

RESPONSE: Ref The UDP Report A commissioned bat and reptile survey undertaken in July 2003 identified no evidence of reptiles within the site. It recommended that provision for bat roosting and hibernation be incorporated within any project. This is accepted.

More up to date information will be provided after permitted access to the site has been obtained, all detailed proposals to be subject to Condition. All survey results will be shared with the EA and their advice and recommendations will be sought.

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In addition, the application should demonstrate that there will not be any increase in light spillage onto the river corridor which provides an important foraging and commuting route for bats. Artificial light, particularly during the key periods of dawn and dusk disrupts the natural diurnal rhythms of these species, as well as a range of wildlife using/inhabiting the river and its corridor habitat. The upper portion of the tideway is particularly important as a corridor due to the presence of vegetated eyots and the trees and vegetation which line the banks and provide cover and attract a valuable invertebrate food source.

RESPONSE: Lighting on site will be low level and discreet similar to other parks. At present there is Street lighting to the Embankment which is outside the site area.

Informative

Please note that, under the terms of the Water Resources Act 1991 and the Thames Region Land Drainage Byelaws, the prior written consent of the Environment Agency will be required for any proposed works or structures, in, under, over or within 16 metres of the flood defences. Please contact Julien Penet on 0207 091 4017 for further details.

RESPONSE: Noted

Sketch 1: Proposals for the redevelopment of King Street properties

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Schedule of Planting and Materials

Planting

Within the design objective of “locally appropriate species, selected in line with the environment and climate of the upper tideway and supplemented by planting to facilitate the sensory design objectives” as stated above our initial planting selection includes the following, all selected for simplicity and low maintenance:-

Hedging (around benches, cut to 1.2m height for security)

- *Elaeagnus x ebbingie* (selected white flowers, evergreen leaves)
- *Myrtus communis* (dec with small flower)
- *Viburnum tinus* ‘Eve Price’(medium dark glossy leaf, white flowers and black berries)

Trellis sections

- *Trachelospermum jasminoides* (small white scented flowers)
- *Rosa* ‘Zepherine Drouhin’ (deep pink flowers)
- *Herera Helix* ‘Sagittifolia’

Scented Garden

- *Viburnum x bodnantense* dawn
- *Lonicera pericylymenum*
- *Clematis x triternata* Rubromarginata
- *Cercidiphyllum japonicum*
- *Chooisya arizonica* ‘Aztec Pearl’
- *Denzia gracilis*

Grass

- Rye based general amenity mix.

Hard surfaces and non-planted areas.

The materials used for which areas will depend the findings of site investigation bearing in mind the nature of the existing substrate/structures below the surface.

As a general principle the permeable surface will be adopted ranging from brick though to “grasscrete” or similar

The areas beneath the trees subject to TPO’s will be cleared and left as grass or other permeable, easily maintained surface. The tress will all be protected during any works.

A detailed survey, leading to an appropriate specification and detail landscape drawings (hard and soft) will be prepared for discussion the both the EA and the Planning Authority

MSt/CS 19/1109

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