



17/07/2023

LB Richmond upon Thames,
Civic Centre,
44 York Street,
Twickenham,
TW1 3BZ

By email:
LocalPlan@richmond.gov.uk

TTL Properties Ltd

7th Floor,
Victoria Station House,
191 Victoria Street,
London
SW1E 5NE

Email: [REDACTED]

Dear Sir / Madam,

Consultation on the Local Plan Regulation 19 “Best for our Borough”

Thank you for providing the opportunity for Transport Trading Limited Properties Limited (TTLP) to comment on Draft Local Plan (Regulation 19) Consultation.

Please note that the views expressed in this letter are those of TTLP in its capacity as a significant landowner and developer only, and do not form part of the Transport for London (TfL) corporate / statutory response. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

Transport Trading Limited Properties Limited (TTLP)

TfL owns around 5,700 acres of land across London and some of the surrounding boroughs, including buildings, land attached to tube, railway and bus stations, highways and worksites. TfL has set up a dedicated commercial property company, Transport Trading Limited Properties Limited (TTLP), to deliver housing in high demand areas and provide an increased revenue stream, and also to manage its commercial estate and undertake other development projects.

TfL has land ownership within site allocations I5 Station Yard and I9 Fulwell Bus Garage.

Local Plan Strategic Vision ‘The best for our borough’

TTLP broadly supports Richmond’s strategic vision for the borough. We are particularly supportive of the strategic objective to meet housing targets set out in the London Plan and to **“maximise delivery of genuinely affordable housing across the borough”** TTLP is committed to optimizing development on appropriate sites in the borough and providing the maximum amount of affordable housing that these sites will enable.

We are also supportive of the borough’s commitment to **“Provide a clear pathway to zero- carbon for all types of new development, to minimise and mitigate the effects of climate change by requiring high levels of sustainable design and construction including reductions in carbon emissions”**. TfL has recently published its sustainable development framework which aims to maximise social, environmental, and economic sustainability on TfL development across London.



Spatial Strategy, Place-based Strategies and Site Allocations

Place-based Strategy for Twickenham, Strawberry Hill & St Margarets

We are supportive of the Council's recognition that this area is an appropriate location for growth. TfL has two significant landholdings in this area.

Site allocation I5: Station Yard

It is welcome that this site allocation includes the TfL landholding. This land has ongoing operational requirements as a bus stand on days when there are events at Twickenham Stadium. However, as recognised in the allocation, should a suitable replacement location be found for this bus stand it will enable development to come forward on this site.

Site Allocation I9: Fulwell Bus Garage and Lidl

We recognize the requirement to retain the bus garage use on this site and any future development will ensure that appropriate facilities are provided to enable future operational requirements to be met.

The allocation currently states ***“Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with policy compliant levels of affordable housing and on-site car parking be considered as a potential redevelopment option.”*** The allocation later recognizes that ***“this site is suitable for a substantial provision of new housing units, including a policy compliant level of affordable housing”***. We agree that the site is suitable for a substantial residential led development which includes appropriate supporting retail and employment uses. The allocation should clarify that it is expected the development of this site will be residential led. This would be in line with bullet point 4 of the allocation which identifies that ***“this site is suitable for a substantial provision of new housing units, including a policy compliant level of affordable housing”***

Any development on the site will provide car parking in line with standards set out in Policy T6 (Car Parking) of the London Plan.

The allocation identifies that ***“there is opportunity to open up the site at the south to improve pedestrian and cycling routes to Fulwell Station. Any proposals for placemaking at this part of the site would need to be designed in a way appropriate to the wider context; including protecting the openness and character of designated open land, and the low-rise urban grain of houses on Wellington Gardens, and protecting the amenities of these occupiers.”*** To enhance access to the station, it is recommended that numbers 10-15 Wellington Gardens are included within this site allocation. Please see the map in appendix I to show these units. The inclusion of these units would ensure high quality public realm could be provided adjacent to the station which would facilitate improved access and placemaking in the area, meeting key objectives of the site allocation.

The allocation also recognizes that ***“Development, including heights, design and massing, should have regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance.”*** In regard to the Fulwell area, the Urban Design Study and Village Planning Guidance document (2023) states that development should ***“respect the scale and proportions of residential buildings, while recognizing opportunities for landmark taller elements with a design elegance along main roads and at key junctions”*** and ***“Create new distinctive landmarks with a design integrity which improve legibility and break monotony of area. Surrounding public realm should be proportionately sized so the height does not overwhelm the human scale”***



The text set out in the Urban Design Study is welcome and as the site is located at a major public transport interchange in the borough, it is suitable for optimized development in the form of landmark taller buildings in line with the guidance in this document and London Plan policies HI (Increasing Housing Supply) and DI (London's Form, Character and Capacity for Growth). The allocation should state ***“Development on this site has the opportunity to create new distinctive landmarks in Fulwell while providing excellent new public realm which creates higher levels of accessibility to Fulwell station”***. The wording within the Urban Design Study and Village Planning document (2023) should be recognized within the site allocation.

Policy II: Affordable Housing

TTLP welcomes the policy that developments ***“should provide 50 per cent of the total number of habitable rooms as affordable housing on site”***. TfL Property Development is committed to delivering 50 % affordable housing (by habitable room) across its portfolio as instructed by the Mayor.

However, policy H4 (Delivering Affordable Housing) of the London Plan identifies that public sector landowners with agreements with the Mayor can take a portfolio approach to delivering 50% affordable housing across public landholdings in London. TfL has such an agreement with the Mayor which provides the flexibility for more complex sites to come forward where they would be unviable providing the full 50% affordable housing requirement, whilst still providing a high level of affordable housing across all TfL landholdings. The policy should be altered to reflect the above.

Policy 47. Sustainable travel choices (Strategic Policy)

Part H. of this policy states ***“H. Where appropriate, ensure that their development proposals safeguard land required for transport schemes and infrastructure set out in the London Plan and/or the Council's Local Implementation”***

TTLP agree that appropriate land for transport should be safeguarded as part of development proposals. This will need to be based on existing and future operational requirements and does not preclude the provision of this infrastructure alongside other forms of development.

Concluding Remarks

We hope that these representations are helpful but if you require any further information or would like to discuss any of the issues raised in our representations, please do not hesitate to contact me.

Yours Faithfully,

Luke Burroughs

Principal Commercial Planning Manager, TTLP

CC.

Peter Elliott (Head of Property Development, TTLP)
Lindy Howard (Senior Development Manager, TTLP)



Appendix I: Map of properties within Wellington Gardens to be included within the Fulwell Bus Garage site Allocation.



