

LBR39/INQ No.33

THE LONDON BOROUGH OF RICHMOND UPON THAMES

TOWN AND COUNTRY PLANNING ACT 1990 – SECTIONS 226(1)(a) AND 226(3)(b)

ACQUISITION OF LAND ACT 1981

THE LONDON BOROUGH OF RICHMOND UPON THAMES (TWICKENHAM RIVERSIDE)

COMPULSORY PURCHASE ORDER 2021

AND

APPLICATION FOR A CERTIFICATE PURSUANT TO SECTION 19 ACQUISITION OF LAND ACT 1981

NOTE IN RESPONSE TO STATEMENT OF EVIDENCE BY JANINE FOTIADIS-NEGREPONTIS
DOCUMENT LBR39 – INQ33

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Introduction

1. This note has been prepared in response to a Revised Statement of Evidence by Ms Fotiadis-Negrepontis (INQ-22).
2. At paragraph 66, Ms Fotiadis-Negrepontis suggests that the Scheme will result in an 'Urban Heat Island Effect':

"A further serious consequence of the tree removals in tandem with the introduction of tonnes of manmade materials is the 'Urban Heat Island Effect'. The Wharf Lane and Water Lane Buildings will only add to the heat through the impact of that effect and of the various air-conditioning units, extractor units and similar infrastructure that will be installed as part of the development. Temperatures will rise in the immediate locality at a time when global temperatures are rising year on year".

Response on behalf of the AA

3. The Scheme has planning permission. The planning application was determined in accordance with the Development Plan for London Borough of Richmond upon Thames. In granting planning permission, the Local Planning Authority determined that the Scheme accords with the Development Plan as a whole.
4. The Development Plan includes policies that seek to ensure that new development mitigates the likely effects of climate change, including rises in temperatures. Specifically, policy SI 4 in the London Plan (Managing heat risk) requires that proposals should minimise adverse impacts on the urban heat island through design, layout, orientation and the incorporation of green infrastructure. Part B of the policy states that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.
5. At paragraph 8.309, the Planning Committee Report (CD 3.37) describes how the Scheme satisfies the various requirements of the cooling hierarchy. An extract is provided below:

Cooling hierarchy:

- 8.309 Schemes should demonstrate how they will reduce the potential for internal heating and reliance on air conditioning in accordance with the cooling hierarchy, of which the scheme has provided:
- 1) reduce the amount of heat entering a building– this has been incorporated using high performing building fabric, solar glazing and deep window reveals
 - 2) minimise internal heat generation – this has been achieved through building fabric, insulation, high efficiently light fittings
 - 3) provide passive ventilation – scheme includes openable windows and doors to flats and commercial to allow natural ventilation when acoustic / air quality requirements

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- allow. Where units are single aspect, openings are sized to provide adequate ventilation
- 4) provide mechanical ventilation – this will be used throughout to provide a constant supply of fresh air and some free cooling, via MVHR units,
 - 5) provide active cooling system – the overheating analysis identifies it is necessary for the commercial units to have active cooling, for thermal comfort, which will be installed as part of the fit out.

Figure 1 Extract from Planning Committee Report

6. The planning permission is subject to Condition NS31. This secures further mitigation to ensure the Scheme is resilient to overheating in extreme summer years. Part 2 of the condition reads as follows:

2. Prior to the construction of the buildings hereby approved, further details to mitigate potential for overheating shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall explore the use of further brise soleil, solar control glazing and mechanical ventilation, and provide full details of specifications, implications on the cooling hierarchy, noise assessments (where applicable), siting, design and implementation. The development shall not be implemented other than in accordance with the approved scheme, which shall be full installed and operational before the first use of any of the units within the proposed buildings on site.

Figure 2 Extract from Condition NS31

7. In the officers summary of conclusions and assessment of the planning balance, the Planning Committee Report concludes at paragraph 11.14:

“The development achieves the sought energy credentials, including BREEAM excellent for the non-residential uses, 35% reduction in CO2 emissions, water consumption targets

and zero carbon. The development achieves air quality neutral, and construction will have negligible impact with safeguarding conditions”.

8. With respect to the removal of trees, the Planning Committee Report concludes that this is mitigated by conditions securing replacement planting on site and in the Twickenham Riverside ward (NS68) and that the Scheme brings about a net gain in biodiversity which is a planning benefit. Condition NS40 secures the delivery of enhancement measures and a 19% biodiversity net gain.