

ST REGIS PAPER MILL AND ADJACENT LAND INCLUDING
SKINDLES HOTEL SITE, MILL LANE, TAPLOW

Application site: St Regis Paper Mill and adjacent land including Skindles Hotel Site, Mill Lane, Taplow

Proposal: Redevelopment of site to provide 150 dwellings and 28 live/work units, replacement hotel, retention of buildings for B1 office purposes, 2 marinas and associated works.

South Buckinghamshire District Council ref: 09/00476/OUT

1. SUMMARY

1.1 The Council has been asked to comment on an application made to South Buckinghamshire District Council for the redevelopment of land on the eastern side of the River Thames, including the Skindles Hotel site adjacent to the Grade 1 listed Maidenhead Bridge, the St Regis paper mill site to the north together with surrounding land, and the Severnside storage depot on the eastern side of Mill Lane.

1.2 The site is an important one for RBWM due to its prominence, potential to attract more people and activity into the town centre and potential to result in additional traffic in the Borough. Redevelopment of the site is welcomed in principle, but new buildings would need to be sensitively designed and of a scale that is appropriate to the surroundings.

1.3 The proposal is for substantial redevelopment of the site with buildings that would be greater in height and scale than those that would be replaced. However no height ranges have been given in the application, which is contrary to the current requirements for submission of outline applications. This authority strongly recommends height ranges are formally established given the importance of this issue.

1.4 There are, therefore, a number of key objection to this application:

- It represents inappropriate development in the Green Belt, with no very special circumstances that justify redevelopment with buildings at a greater scale than those that they would replace.
- Detrimental impacts on the listed bridge and listed Glen Island House.
- Detrimental impacts on the setting of the Thames.
- Unacceptable development within the flood plain.
- The safe flow of traffic into and out of the Royal Borough.

1.5 It is therefore considered that the Council should respond to South Buckinghamshire District Council with objections to the proposed redevelopment.

2. DESCRIPTION OF THE SITE AND ITS SURROUNDINGS

2.1 The application site lies immediately to the east of the boundary with RBWM and to the north of the A4, between the River Thames and the Jubilee River. It includes the St Regis paper mill, Severnside storage depot, Skindles Hotel and other buildings that include the listed Glen Island House (Grade 2), Mill Island House, Dunloe Lodge, an additional Victorian cottage and an old stable

block, together with surrounding land, and an area of open pasture on the south eastern side of the site. The site is in Flood Zones 2 and 3, and is wholly within the Green Belt.

3. DESCRIPTION OF THE PROPOSAL

3.1 This is an outline application with access being the only reserved matter for which determination is sought at this stage.

3.2 The proposal incorporates the following elements:

- Demolition of the existing Skindles Hotel building and its replacement with a 150 bedroom hotel and associated car parking;
- On the St Regis site, nine new 4- and 6-storey buildings, accommodating approximately 76 no. 2 and 3 bdr. apartments and 19 townhouses. The nine buildings would comprise five no. 6-storey blocks in a line close to the Jubilee River frontage, three buildings arranged in two crescents around two marinas and a further 4-storey apartment block to be located between the northern marina and the listed Glen Island House;
- On the Severnside site, up to 10 no. 3-storey buildings to accommodate 28 live-work units along with town houses, apartments and an office hub;
- Relocation of the Mill Lane / A4 access;
- Creation of a public car park to the north-east of Dunloe Lodge;
- Engineering works for two new marinas;
- Refurbishment of Dunloe Lodge and a nearby Victorian cottage as dwellings;
- Retention of Glen Island House and Mill Island House for B1 employment use; and
- Associated landscaping and walkways.

3.3 The proposed residential component would comprise in total 43 townhouses, 107 apartments and 28 live-work units. It is intended that 20% of the units, including the live-work units, would be affordable.

4. EXPLANATION OF RECOMMENDATION

4.1 The key issues for consideration are:

- i Whether the proposal is appropriate development in the Green Belt;
- ii Whether it would result in any increased risk from flooding or place additional occupants at risk;
- iii Effect on the Conservation Area and listed bridge;
- iv Effect on the setting of the Thames;
- v Highways safety issues.

Issue 1 - Green Belt

- 4.2 The whole of the site is in the Green Belt. In common with the RBWM Local Plan, the South Buckinghamshire Local Plan policies reflect national guidance set out in PPG2: Green Belts.
- 4.3 On the St. Regis paper mill site, the footprint of the proposed buildings would be approximately the same as those that they would replace. These include, in addition to the paper mill complex, a nineteenth century stable block that would have formed part of the Glen Island House complex, and several older one- and two-storey buildings. The replacement buildings would however be considerably higher than the existing paper mill buildings or indeed than any of the smaller buildings proposed for demolition. The nine new buildings would be prominent in views from the western side of the Thames. In summer Glen Island House is the only prominent building within this part of the application site as viewed from the Royal Borough, although glimpses of the paper mill complex can be seen through the riverside trees. During winter months, views are much more open. The replacement buildings would be much more prominent than those currently on the site, with a corresponding detrimental effect on the openness of this part of the Green Belt.
- 4.4 At the Severnside site, buildings would be dispersed across the whole of the existing paved area, and with most of these being three-storey live-work units along with a two-storey office hub, the predominant scale would be higher than the single group of buildings that they would replace.
- 4.5 At the Skindles Hotel site, the proposed replacement would be wider than the existing building, although the northern part of the existing footprint would not be built on following demolition of the existing hotel. Closer to Bath Road, the proposed replacement would be considerably wider than the existing building, extending not only across the site of the existing building but also over the southern end of Mill Lane and onto land on the western side of the existing VW dealership building. It would almost abut the Bath Road along the eastern side of this road frontage. Height would be four storeys, stepping up to five storeys high.
- 4.6 Provision of floor levels to meet the minimum flood design level would result in deeper ground floor levels than would otherwise be required. No height ranges have been given in the application (contrary to current requirements for submission of outline applications, which were introduced by the 2006 amendment to the General Permitted Development Order). This authority strongly recommends height ranges are formally established given the importance of this issue.
- 4.7 Notwithstanding this omission, reference to the submitted indicative elevation plans shows that the proposed buildings would be within the following height ranges:

St. Regis paper mill site:

- | | |
|--------------------------------|---------------|
| • Crescent / marina townhouses | 14 to 15 m; |
| • 4-storey apartment block | 13 to 17.5 m; |
| • 4-storey apartment block | 17 - 20 m; |

(The upper height limit for the 4-storey block is due to a steep mono-pitched roof shown in the indicative elevation drawings.)

Severnside site:

- Live-work units / townhouses 11.5 to 12 m;
- Apartments and office hub 9.5 to 12.5 m;

Skindles Hotel site:

- .Replacement hotel 17 to 22 m.

- 4.8 The construction of new buildings in the Green Belt is inappropriate unless it is for one or more of a limited range of purposes, which include essential facilities for outdoor sport and outdoor recreation and redevelopment of major existing developed sites identified in adopted local plans, which meets the criteria in Annex C of PPG25.
- 4.9 In this case, the proposed new marinas are for private moorings, and would essentially be ancillary to the adjacent dwelling units. They cannot therefore be viewed as essential facilities. The site is a major existing developed site, but is not identified as such in the adopted South Buckinghamshire Local Plan. It is however one of three major sites in the emerging Core Strategy. The criteria in Annex C of PPG25 are instructive on the types of development that would be considered appropriate at such a site. These are that redevelopment should:
- (a) have no greater impact than the existing development on the openness of the Green Belt and the purposes of including land in it, and where possible have less;
 - (b) contribute to the achievement of the objectives for the use of land in Green Belts;
 - (c) not exceed the height of the existing buildings; and
 - (d) not occupy a larger area of the site than the existing buildings (unless this would achieve a reduction in height, which would benefit visual amenity).
- 4.10 The proposal fails to meet these tests, due particularly to the increased scale of the buildings, which notwithstanding any particular design merits the proposed buildings might have, would have a considerably greater impact than the existing development on the openness of the Green Belt. The proposal also runs counter to some of the purposes of including land in the Green Belt, which are:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns from merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.11 Inappropriate development is, by definition, harmful to the Green Belt. It is not considered that very special circumstances exist that justify such inappropriate development. Redevelopment of the site at a lower scale may however overcome this objection, but this is not within the scope of the current application. The proposal must therefore be opposed on grounds of being inappropriate development, which is by definition harmful to the Green Belt, and because of the actual harm to the openness of the Green Belt identified above.

Issue 2 - Flooding

- 4.12 The site is within Flood Zones 2 and 3. FZ2 includes the 1 in 1000 year flood plain for rivers, and covers areas with a “medium” probability of flooding. FZ3 is divided into two sub zones: FZ3a, the 1 in 1000 year flood plain which is subject to a “high” probability of flooding, and FZ3b, the 1 in 20 year or “functional” flood plain. Most of the replacement buildings would be within FZ2, although part of one of the marina townhouse buildings and one of the 6-storey apartment buildings on the St Regis site would be within FZ3. PPS25 classifies these as ‘more vulnerable’ land uses that should be located within FZ1 or, if no suitable sites are available, within FZ2 subject to meeting the requirements of an exception test and other criteria. Advice contained within PPS25 is however that such development within FZ3 is not acceptable. The presence of the existing buildings cannot therefore be used to justify residential development within this part of the floodplain, particularly given that it is likely to put a greater number of people at risk in a flood event than at present.
- 4.13 PPS25 advises that, in FZ2, developers and LPAs should seek opportunities to reduce the overall level of flood risk through the layout and form of development and through the appropriate application of sustainable drainage techniques. Development proposals in FZ3a seek similar outcomes and in addition, through relocation of development to land in zones with a lower probability of flooding, restoration of the functional floodplain and flow pathways, and identification and allocation of open space for flood storage.
- 4.14 The application’s Flood Risk Assessment states that, for the buildings and their occupants, flooding issues would be dealt with by setting finished floor levels 30 cm above design flood levels, and provision of dry access and egress via Mill Lane to the east, to Berry Hill. It is intended to reduce impermeable surfaces across the site by 7.5%, and to provide additional flood storage by lowering ground levels on the northern part of the Severnside site. Sustainable drainage techniques would be incorporated ‘wherever possible’. These SUDS areas would also allow for amenity and ecological enhancements.
- 4.15 While redevelopment of the site within FZ2 may be acceptable, subject to confirmation that safe flood egress routes can be provided and meeting Green Belt and other criteria, PPS25 is clear in respect to the types of development that may be located within FZ3a. This is limited to water-compatible uses and infrastructure. While marinas may therefore be acceptable within this flood zone, residential use clearly is not.
- 4.16 The application seeks to satisfy the exception test requirement, which PPS25 requires to justify development in the flood plain. The test has three criteria:
- (a) the proposal must demonstrate wider sustainability that would outweigh the flood risk;
 - (b) the development must be on previously developed land, or there must be no reasonable alternative site available on previously developed land; and
 - (c) a Flood Risk Assessment must demonstrate that the development will be safe, without increasing floor risk elsewhere, and where possible will reduce flood risk overall.
- 4.17 In seeking to demonstrate wider sustainability benefits, the application relies heavily on the emerging SBDC Core Strategy and Sustainability Appraisal. The SB Core Strategy identifies this as one of three strategic sites within the

Borough while the SB Sustainability Appraisal states that the regeneration benefits of developing the site outweighs flood risk issues. The five-year supply of housing land is currently satisfied, although beyond that timeframe the contributions of the three strategic sites is required. With respect to the other two sites, one is not considered to be suitable for residential development and the availability of the second is uncertain, being an MoD site with no specific date set for its release. The site's contribution towards the Council's housing requirements in the medium term is therefore considered to be important. The emerging Core Strategy outlines that the majority of units would be deliverable by 2016.

- 4.18 In addition to this issue, the application's 'Sequential / Exception Test' documents cites the other benefits of the proposal in support of the proposal, namely
- clearance of derelict and unsightly buildings;
 - restoration of listed and historic buildings;
 - provision of affordable housing;
 - new business opportunities (noting a lack of business incubator units in the District);
 - enhancing recreational facilities; and
 - enhancing biodiversity.

Issue 3 - Effect on the Conservation Area and listed buildings

- 4.19 The Council's Conservation Officer has commented on the proposal's conservation implications, which include:
- Impact on the setting of the grade I listed Maidenhead Bridge;
 - Impact on the setting of Maidenhead Bridge Conservation Area, which immediately adjoins Taplow Riverside Conservation Area in which the application site is located;
 - Impact on the setting of Boulters Lock Conservation area, which abuts the northern end of the application site.

In addition the application proposals would have an Impact on the views from the river and riverside promenade along much of the river frontage between Maidenhead Bridge and Boulters Lock.

Maidenhead Bridge and Conservation Area:

- 4.20 The Skindles site is presently of rundown appearance but it is a building of some merit, which is identified in the Taplow Riverside CA appraisal as a building of local significance. It is building that is associated with the heyday of Maidenhead's riverside development in the late 19th and early 20th centuries, and reflects the architectural style that predominates in the area around the bridge. The proposed replacement building would be part-4, part-5 storeys, as opposed to the 2 to 3 storey development that predominates in the area, and is of a contemporary style. It therefore appears to show no respect to the context of the adjacent Conservation Areas, and would neither preserve nor enhance their character and appearance. It would also dominate the eastern side of the bridge, and detract from its setting, both in views across the river from Maidenhead, and on the approaches to the bridge from the east, where the building would be at its highest.

Impact on Boulters Lock Conservation Area and riverside views:

- 4.21 The northern extent of the development site extends towards the southern tip of Boulters Lock CA, which is dominated by Boulters Hotel situated on the river island. There are long views up to the Hotel and Lock from the riverside promenade, and presently the eastern river bank is heavily screened with trees and little evidence of building other than the distinctive Glen Island House, which is grade II listed. The gardens of this house fall down to the river and are important to its setting. The sections provided clearly indicate that the 6-storey apartments situated to the rear of Glen Island House and fronting onto the Jubilee River would rise above the tree screen and would therefore be visible from the Maidenhead side of the river. The plans also indicate a substantial amount of car parking around Glen Island, potentially visible from river views. All of these aspects would detract from the setting of Glen Island, and have an adverse impact on the views around and into Boulters Lock Conservation Area. The scheme will also involve quite considerable opening up of the river frontage between Boulters Lock and Maidenhead Bridge. The northern section of this area is presently heavily vegetated and has a very natural edge that screens the paper mill complex quite effectively, particularly when trees are in leaf. The proposal for a Marina style development accessed off this stretch with 4-storey buildings is inevitably going to open up this river edge, which would be detrimental to the rural character of this stretch.
- 4.22 In addition to the above issues, which are drawn from the Council's Conservation Officer response, the location of the proposed buildings in relation to Glen Island House requires further consideration. This listed building is prominent in views from Ray Mead Road. The siting of the proposed four-storey buildings adjacent to Glen Island House is also insensitive to the character and setting of this attractive listed building. Notwithstanding the improvement in its setting that would result from the demolition of the industrial complex, the loss of the stables block to the rear would remove a building that is much more satisfactory in terms of its relationship to Glen Island House, and that also forms a positive aspect of the listed building's setting.
- 4.23 While it is recognised that the application does not seek to determine layout, the current requirements for submission of an outline application include indications of the size and location of the buildings. Location of buildings of the scale indicated in the locations shown is clearly insensitive not only to the setting of the Grade I listed Maidenhead bridge but also to the Grade II Glen Island House. Both would adversely affect the setting of RBWM Conservation Areas, as well as SBDC's Taplow Riverside CA, and adversely affect the setting of the Thames.
- 4.24 It is apparent from the above comments that refurbishment of the existing Skindles Hotel building would be preferable to replacing it, as this would result in an improvement to the setting of the listed Maidenhead Bridge. However the application states that the building is in a dangerous condition, and that it would probably not be viable to refurbish it. However, no evidence has been put forward to demonstrate this. Any replacement would need to be sensitive to the scale of surrounding development including the Conservation Area, and the scale of the proposed building is not considered suitable in this location.

Issue 4 - Setting of the Thames

- 4.25 The proposal's effects on the setting of the Thames are very much the same as those affecting the two conservation areas and the listed buildings / structures. As discussed above, the indicative elevations show a contemporary style for all of the buildings that are proposed. While there are a few prominent buildings of late twentieth century design along the river opposite, in particular the Woodhurst North and Woodhurst South apartment buildings, the predominant scale and style is as noted above two- and three-storey Victorian.
- 4.26 it is considered therefore that the larger scale of the proposed replacement scale and the opening up the mainly wooded banks of the Thames in the northern part of the site would impact adversely upon the setting of the Thames as viewed from the Royal Borough.

Issue 5 - Traffic safety issues

- 4.27 Access is the one reserved matter for which the determination is sought as part of this application.
- 4.28 The applicant's Transport Assessment (TA) states that the morning / evening peak hour flows will increase by an additional 55 and 43 two-way vehicular movements respectively. It assumes that the junction of the A4/A4094 Ray Mead Road is signalised. This is not the case. Whilst the Badnells Pit redevelopment would secure the installation of traffic signals at this location, implementation of that consent cannot be guaranteed.
- 4.29 Where the TA confirms that a development will have material impact on the highway network, the level of impact at all critical locations on the network should be established. A particular example of material impact would be a worsening of congestion. In congested areas, the percentage traffic impact that is considered significant or detrimental to the network may be relatively low (possibly below the average daily variation in flow), and should have been determined in discussions with the RBWM as Highway Authority.
- 4.30 No reference is made in the TA to the Maidenhead Air Quality Management Area.
- 4.31 No mitigation measures are promoted in the conclusion/summary of the TA at the A4/A4094 junction, and it fails to address in any way the impact on the surrounding highway network. It does not promote a "nil detriment" development. With the increase in built form, the proposed uses of the site and on-site parking levels, the Highway Authority concludes that the development would have a detrimental impact on the highway network.

5. OTHER CONSULTATION RESPONSES

Maidenhead Civic Society

- 5.1 For the residential component, the level of development exceeds the existing. Flood related issues have not been fully considered. The apartments blocks along the Jubilee River area excessive, and it appears that these would be visible from Ray Mead Road, especially in winter. The Maidenhead Civic Society (MCS) regards the other residential proposal as reasonable, and supports the retention of two Victorian houses for conversion.
- 5.2 For the hotel development, MCS is very concerned at the proposed scale, in respect to the height of the frontage to the Thames and eastwards along the A4. While recognising that this is an outline proposal, the elevations submitted do not have the distinctive architectural merit demanded by such a landmark site that is adjacent also to a Conservation Area.
- 5.3 Traffic issues are also a concern, and moving the Mill Lane entrance further east is therefore supported. However this may require a mini roundabout, and this would cause further congestion. Further analysis is needed regarding the traffic flow and volumes that would be generated
- 5.4 Use of the site for open space recreational facilities, including marinas and cafes to create diversification is supported. Public access to the river should be improved, and the Society is disappointed that a footbridge over the Thames to Boulters Lock does not form part of the proposals. This would allow a safer walking route across the river than the A4 bridge, and would also allow a circular walk to be created. SBDC and RBWM should work together on river amenity issues and on this bridge proposal in particular.
- 5.5 In conclusion, while generally in favour to the redevelopment proposals, the specific concerns outlined above are significant.

Councillor Dudley

- 5.6 A footbridge to Boulters Island should form part of any redevelopment, and its implementation should be linked to the development of the hotel and recreational facilities.

6. CONCLUSION

- 6.1 In respect to the Green Belt location of the site, there is a case for sensitive redevelopment of the site but this needs to be compatible with the criteria for appropriate development set out above in paragraphs 4.8, and with the purposes of including land in the Green Belt that are set out in paragraph 4.9.
- 6.2 Redevelopment of the remaining parts of the site is welcomed in principle, but new buildings would need to be sensitively designed and located, and must be of scale that is appropriate to this sensitive location. While the application makes a case for inappropriate development in the Green Belt, it is not considered that very special circumstances exist to justify the scale of what is proposed. This and each of the issues raised above - detrimental impacts on the listed bridge, detrimental impacts on Conservation Areas within RBWM including the poor relationship of proposed buildings to the listed Glen Island House, detrimental impacts on the setting of the Thames, development within the flood plain and the safe flow of traffic into and out of

the Royal Borough - represent robust reasons for refusal of the application. While recognising the need to redevelop this strategic site, it is recommended therefore that the Council respond on this basis, and object to South Buckinghamshire District Council with the view that the application should be refused.

6.3 The recommended objection should be made on the following broad grounds:

(1) The outline planning application would:

- be detrimental to the openness of the Green Belt and contrary to the purposes of including land in it;
- result in detrimental impacts on the Grade I listed Maidenhead Bridge and the Grade II Glen Island House;
- result in detrimental impacts on Conservation Areas within RBWM;
- result in detrimental impacts on the setting of the Thames;
- result in an excessive level of development within the flood plain;

(2) The details submitted in respect to the reserved matter of access:

- would result in detrimental impacts on the safe flow of traffic into and out of the Royal Borough;
- does not provide for the improvement of air quality within an AQMA.

APPENDICES:

Site plan as existing and proposed.