

Ms J. Simpson
Development Management department
London Borough of Richmond upon Thames
Civic Centre
44 York Street
Twickenham, TW1 3BZ

5th April 2019

Dear Ms Simpson

Re: Planning application ref. 19/0646/FUL at Greggs, Gould Road, Twickenham, TW2 6RT

I am representing the residents of nos. 4, 6, 8, 10 and 12 Gould Road (names given at end of this letter) and wish to object to the planning application submitted for the "demolition of existing buildings (with retention of single dwelling) and redevelopment of the site to provide up to 116 residential units and 175sq.m commercial floorspace; landscaped areas; with associated parking and highways works and other works associated with the development" at the above named address (ref. 19/0646/FUL).

They live immediately adjacent to the site and will be most affected by this proposal. We therefore request you take our concerns into consideration when assessing this application. Firstly, though, we would like to state that we are not against development of this site *per se* but it is the scale and density of development proposed which is of utmost concern to us (which in turn will impact significantly on our amenity in terms of increase in bulk, massing, location of the proposed housing, parking, increase in traffic and other issues which will be addressed further below).

We request that you as the case officer visit our properties and assess the impact of the proposal on our amenity from our dwellings and garden spaces. We can also explain how the traffic and parking situation exists at present and how this would be severely impacted upon with this development.

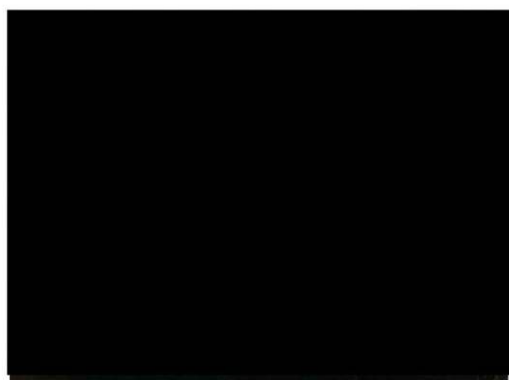
Whilst we acknowledge that a public consultation period was undertaken, many of our comments have not been included within the Planning Statement and have not been addressed within the final design. It is also interesting to note that the developers did not wait for the Council's pre-application response but have submitted the planning application regardless of what the Council's comments would have been. This in itself flies in the face of Government advice which states in the National Planning Policy Framework (NPPF) that "*good quality pre-application discussion enables better coordination between public and private resources and improve outcomes for the community*".

It should also be noted that many of the reports refer to the previous design of Block G, and not the proposed/current design. This puts doubt into our minds if any of the submitted reports are correct or based on an incorrect version of the plans. Some of the plans used of Crane Mews are misleading in terms of what buildings actually exist and some of the plans used for the Greggs site are misleading as to what

buildings exist behind nos.4-12 Gould Road (i.e. temporarily positioned shelters appear to be permanent structures).

Proposed development

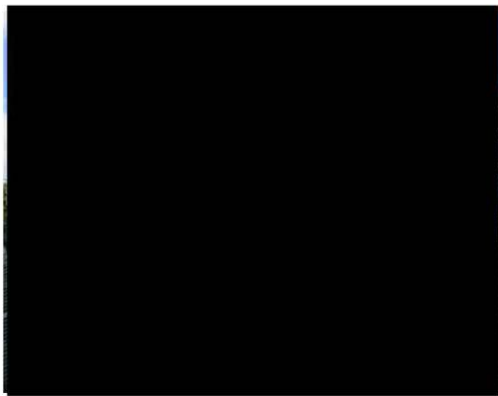
This extract below from the proposed ground floor layout shows the development which will most impact our amenity in terms of bulk and massing from the development of block G – houses G1 to G4. The outlook from our houses will be demonstrably changed from one of greenery and sky to a block of houses finished in a dark metal (which is totally out of keeping/character with the designs of our houses).



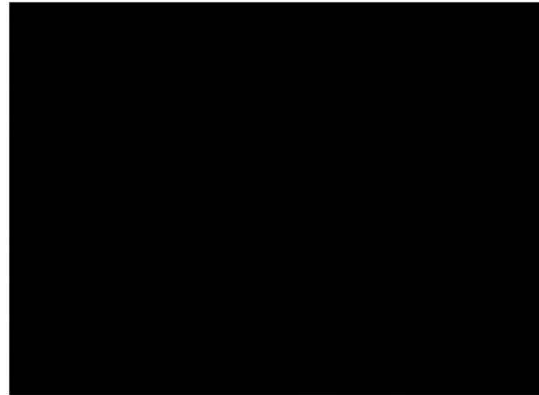
View from rear of no.4 Gould Road



View of the rear of houses on Block G.



View from rear of no.6 Gould Road



View from rear of no.8 Gould Road

The proposed houses will be in very close proximity to our houses. The Supplementary Planning Document for Small and Medium Housing Sites gives a distance of 13.5m where there are non-habitable windows being proposed (this is only in relation to privacy, sunlight/daylight and overshadowing). It is accepted that there is unlikely to be harm from overshadowing due to the orientation of the houses north of our houses.

However, whilst the design of Block G has ensured there are no overlooking windows to our properties at first floor level, the height of the houses at 6.4m finished in metal and their close proximity will **harm our visual amenity and represent a poor outlook**. There is a concern about the height of the ground floor windows which could result in **overlooking**.

The rear wall of No.4 Gould Road is 7.6m from its rear boundary and the rear walls of Nos. 6, 8, 10 and 12 are 9.9m from their boundaries. The rear boundaries of these houses are separated from the boundary of the Greggs site by a 90cm wide shared alleyway. Thus, the proposed rear elevation of the houses would be within 10.5m and 12.8m from the rear of the existing houses on this part of Gould Road.

The rear French doors of the proposed houses would be sited less than 13.5m from our rear first floor windows and therefore the existing residents would be able to overlook into the rear of the houses with ease which is an unsatisfactory position to put the existing residents in. There is no mutual overlooking at present and this should not be allowed with this development.

Overall, we do not agree with paragraph 7.138 of the Planning Statement which states that "distances between properties offer a substantial improvement and are commensurate with the distances between buildings in the surrounding area" so the proposals "meet the aspirations of LP8 and have regard to LBRUT Residential Standards SPD." This clearly is not true for the residents of nos. 4-12 Gould Road who will have a much worse outlook and residential amenity.

The rear gardens of the houses on Block G are very small for 2 bedroom/4 person dwellinghouses and are out of keeping with the size of gardens in the immediate vicinity. The proposed gardens are 2m in depth and 5m wide. 10sqm of garden space is inadequate for this size of dwellinghouse and represents how

cramped and over-developed the site is. Further, the rear gardens are hard up to our boundaries and will result in **noise and disturbance** which will harm the peaceful enjoyment of our gardens and homes.

The main concern is the proposed density of development as a whole and how this would result in a cramped over-development of the site – the developers are simply trying to squeeze too many houses and flats on this site. One symptom of this over-development is the fact that the main access running through the scheme (accessed from Edwin Road but also via the corner of Gould Road and Crane Road) is not wide enough to include a pavement for the residents/visitors of the proposed housing. This is poor design and poor planning. Having a shared surface adjoining a corner with limited sightlines does not seem safe, particularly at the entrance to the site at the Gould Road/Crane Road corner.

The proposal also includes a large bin store and bicycle store hard up to the boundary with no.4 Gould Road and new house G4. This would be harmful to residential amenity resulting in noise, smells, light pollution and disturbance which would be unacceptable and unneighbourly.

For the reasons set out below, it is considered that the proposal is an unneighbourly form of development which will be harmful to the amenities of those in nos. 4-12 Gould Road due to its height, close proximity to the boundary and being overbearing and harming the outlook from their homes.

At the neighbour consultation meetings the developers implied that the development at Crane Mews sets a precedent for a building line close to our houses. However, this cannot be a fair and correct comparison. Crane Mews is certainly not representative of the pattern of development in this area and does not provide a good example of planning which should be repeated – i.e. development should not be hard up against the rear gardens.

Policy considerations

The development at the property fails to comply with the following policies. Due to the minor nature of this application the London Plan policies have not been referred to.

The National Planning Policy Framework (2019) states at paragraph 124 that “Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities” and that decisions should ensure that developments “are visually attractive as a result of good architecture, layout and appropriate and effective landscaping” (paragraph 127). The proposal fails to meet these national standards.

Local Plan (July 2018)

The main relevant policies relating to our objection are as follows:

Policy LP 1 ‘Local Character and Design Quality’ states “*Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local*

area” – This proposal fails to comply with this due to the scale, height and density of the proposal which bears little resemblance to the immediate area.

Policy LP 2 ‘Building Heights’ states:

The Council will require new buildings, including extensions and redevelopment of existing buildings, to respect and strengthen the setting of the borough’s valued townscapes and landscapes, through appropriate building heights, by the following means:

- 1. require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area;*
- 2. preserve and enhance the borough’s heritage assets, their significance and their setting;*
- 3. respect the local context, and where possible enhance the character of an area, through appropriate:*
 - a. scale – **fails to comply***
 - b. height - **fails to comply***
 - c. mass - **fails to comply***
 - d. urban pattern - **fails to comply***
 - e. development grain - **fails to comply***
 - f. materials - **fails to comply***
 - g. streetscape - **fails to comply***
 - h. Roofscape **fails to comply** and*
 - i. wider townscape and landscape” **fails to comply.***

Policy LP 8 ‘Amenity and Living Conditions’ which require a high standard of design and that developments are not visually intrusive or have an overbearing impact as a result of the height, massing or siting, including through creating a sense of enclosure.

Policy LP 15 ‘Biodiversity’ which sets out the Council will protect and enhance the borough’s biodiversity by “enhancing wildlife corridors for the movement of species, including river corridors, where opportunities arise; and maximising the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.

Policy LP 18 ‘River corridors’ states at criterion C that:

All development proposals alongside or adjacent to the borough’s river corridors should:

- a. Retain existing public access to the riverside and alongside the river; and
- b. Enhance existing public access to the riverside where improvements are feasible; or
- c. Provide new public access to the riverside where possible, and maintain existing points of access to the foreshore subject to health and safety considerations. There is an expectation that all major development proposals adjacent to the borough’s rivers shall provide public access to the riverside.

Policy LP 31 ‘Public Open Space, Play Space, Sport and Recreation’ states that the Council will require all major development proposals in the borough to meet the Public Open Space,

play space, and playing fields and ancillary sport facilities needs arising out of the development.

Policy LP 39 'Infill, Backland and Backgarden Development' identifies that all infill & backland development must reflect the character of the surrounding area and protect the amenity & living conditions of neighbours.

Policy LP 44 'Sustainable Travel Choices' states that the Council encourages high trip generating development to be located in areas with good public transport with sufficient capacity, or which are capable of supporting improvements to provide good public transport accessibility and capacity, taking account of local character and context.

Density

The proposed development has 102 units/ha & 344 hr/ha which equates to the ratio for habitable rooms for an Urban area. In our opinion (as local residents), this part of Twickenham is not an urban area but should be considered sub-urban for considering which density of housing should be acceptable.

The proposed development is much more akin to an urban city centre development than a residential development in infill/backland site behind two storey terraced cottages in an area acknowledged to have insufficient green space.

If the sub-urban ranges were utilised, the ranges would be: 40-80 u/ha & 150-250 hr/ha. The proposal **significantly** exceeds this on both counts. The developers need to re-consider this aspect which would consequently free up the site as a whole and ensure it was not so cramped and over-developed.

We will be guided by the Council's policy officers who are experts on the need for housing in this part of the borough and what the density and housing mix should be. It is our understanding that the Borough of Richmond-upon-Thames can demonstrate a 5.5 years housing land supply up to 2025 and therefore the Council will be meeting the Government's objective of significantly boosting the supply of homes. The proposal at the density sought is therefore not essential compared to parts of the country where housing is not coming forward to meet 5 year housing land supply.

We have read the Collier's Financial Viability Assessment from August 2017 which proposed 101 residential units (and commercial floorspace) and this was found to be a viable scheme. This demonstrates that a scheme with much fewer units is possible on this site (albeit the overall layout was not acceptable).

Character of area

The area is characterised by two storey traditional houses and the few developments higher than this in the immediate area does not set a precedent for such a large scale, high-rise, intensive urban development in a quiet series of residential terraced cottage streets. Below are photographs which demonstrate this point.

May Road looking east:

Current view:



Proposed view:



Crane Road looking north:

Current view:



Proposed view:



Residential amenity

The proposed terraced Block G would result in a 6.5m high building extending 22m along the back edge of our houses and rear gardens. This would result in an overbearing form of development which would loom over us as we seek to enjoy our private space. Further it would result in a loss of space and a view of trees and open skies beyond. Overall, it would result in making our outdoor space feel encroached upon and unwelcoming.

Further, as confirmed in the Daylight and Sunlight Assessment, there will 5 properties who will not fully adhere to the BRE Guidelines for daylight (VSC and NSL) and sunlight (APSH). This is clearly unacceptable and should be a reason to refuse the application. Of these five houses, one is no.4 Gould Road where the

Daylight and Sunlight Assessment confirms the kitchen would experience an alteration in daylight distribution of 32%, which is beyond the 20% outlined within the BRE Guidelines.

One of the residents of Gould Road is 1.96m tall and therefore, if he was standing in the kitchen of House G, he would be able to look directly into the gardens of 4-12 Gould Road, into the rear ground floor rooms and up into the 1st floor and 2nd floor rear bedrooms. Due to the very limited depth of the Block G gardens and the size of the doors, it is likely that overlooking could occur to the detriment of existing residents of Gould Road.

There is also a concern about light pollution from the security and safety lighting by the proposed cycle/bin store behind no.2 Gould Road, and at the entrance to site. The light spillage from the velux rooflights and rear French windows would also result in a considerable amount of light pollution in close proximity to the rear of Gould Road.

By virtue of the scale, siting and design of the proposed houses in such close proximity to the houses on Gould Road there is considered to be loss of amenity for neighbouring properties from overlooking, loss of outlook, light pollution, harm to visual amenity and loss of light. Further, as set out above, the rear gardens are hard up to our boundaries and will result in noise and disturbance which will harm the peaceful enjoyment of our gardens and homes. This is contrary to policy LP8 of the Local Plan.

Lack of play space

The proposal contradicts policy LP 31 as there is inadequate play provision on site with no provision at all for children over 5.

Currently, there are very few facilities for children aged over 5 locally (with just a couple of structures in Kneller Gardens - one climbing frame and a large swing probably intended for 5-12 year olds – one table tennis table, two basketball hoops (but not a full size basketball court as they imply in the planning documents) and three tennis courts (which children now have to book online if they want to use them , and will shortly be passcode locked to ensure they can't use them without booking). The facilities for older children is just not adequate in this area.

Policy LP31 requires major development to provide their own play facilities for children over 5 on site (where it is shown that there is inadequate play space within 400m of the site) and this has not been provided at this site. The new development by Twickenham Station has included facilities for over 5s – a full basketball court, football 'pitch'/court and skate park. Whilst a financial contribution may be provided by the developers to improve local play space this is not sufficient as more play space is required within this immediate vicinity rather than cash to improve existing facilities which are further than 400m away (such as Kneller Gardens which is 480m away).

Highways/parking issues

The Planning Statement accepts in paragraph 7.19 that “There are significant Site constraints associated with the Site within the residential area” and at 7.21 “the streets surrounding the Site are narrow residential streets and are often heavily parked on both sides”. Whilst the planning consultants seem to be concerned about the impact of the HGV vehicles on local residents, these comments are most appropriate in the context of the 100s of vehicles which will be added to this part of Twickenham if this development is granted planning permission. HGVs did not impact on the residents of Gould Road but having an entrance/exit into the housing development off Gould Road will result in a significant increase in traffic generation. This will be extremely harmful to local residents where parking stress is high at present and this will exacerbate it to an unacceptable level.

It is interesting to note that several years ago HGV traffic was prohibited to use Gould Road (it is understood this was after 2004 when HGV traffic ceased driving to this corner and a sign was erected on the Meadway entrance to Andover/Gould Road to confirm this). Further, the part of the Greggs site accessed from Gould Road only had 23 parking spaces and traffic to the site will be significantly increased if this development of this size occurs.

The Design and Access Statement provides walking distances to Twickenham and Whitton stations which are misleading as they range from 15 to 19mins and assume a very fast walker.

Paragraph 2.7 of the Design & Access Statement states that “The nearest bus stop is 5 minutes’ walk south of the site with three bus connections to various locations in Richmond.” The existing bus stop to the south referred to in the Transport Assessment (TA) (GL) is on a narrow pavement immediately outside Sainsburys. This bus stop is on an already over-congested narrow strip of pavement which is also frequently parked on at the bus stop location by delivery vehicles for Sainsburys. Stop GL in fact currently only offers two direct routes to Richmond (H22 & 490), and TFL have recently been consulting on changes to bus services from Twickenham, which would include termination of the H22 route in Twickenham. If these changes go ahead there will only be one direct service to Richmond from stop (GL), with other routes requiring changes in the centre of Twickenham. Most locals actually end up going to bus stops further into Twickenham (stop GP) on Heath Road, at a 8-10 minute walk from the site to the east. This is served by more bus routes and does currently offer three direct services to Richmond (R70, H22 & 490), however, this will reduce to two if the H22 route is to terminate in Twickenham.

This proposed housing development with limited car parking spaces (it is assumed to encourage use of public transport) will put a huge pressure on the bus routes and train services which are already over-crowded.

Existing bus services are already heavily overcrowded at key commute times, and particularly poorly served for pupil commutes to school.

The TA confirms that the proposals will not lead to increases in traffic and will not impact upon parking in the surrounding area in accordance with Policy LP8 and LP44 and concludes “the proposals will not impact negatively upon the area or create conditions prejudicial to the transport network, highway safety or neighbouring amenity”. The TA assessed the trip generation from a factory in Brent and did not use data from this Greggs site.

We request that the Highways department carefully assess the proposal for construction traffic to use Andover/Gould Road as one of its two access ways and the Gould Road/Crane Road entrance as one of the two entrances to the site. This is due to the clear unsuitability of the road and an entrance for that purpose, and the fact that the Council itself has already erected a sign at the Meadway and of the road saying that the road ahead is unsuitable for large vehicles.

Also, of utmost relevance are the following points:

- The CPZ is not 24/7 and visitors from the Richmond Borough will be able to use their own visitors permits to park here;
- There are few passing places on Gould Road & Crane Road, meaning that the road becomes a rat run, with road rage on the corner quite a common occurrence;
- It is not just the car yield of residents, but also their visitors, service & delivery vehicles, taxis if they can't have cars etc (due to “limitations” on parking) which needs addressing;
- Waiting delivery vehicles are already a big problem here in creating congestion in two-way single lane roads;
- The increase in numbers of vehicles idling on the corner of Gould & Crane Roads due to congested roads – there would be increased noise & pollution immediately outside our homes and children's bedrooms following this development;
- The pinch points at Gould/Crane Road, Edwin Road corner, May Road (narrow road access from Twickenham Green), Knowle Road (narrow road access from Twickenham Green) and Colne Road (narrow road access from Heath Road frequently blocked by vehicles parked/waiting on double yellow lines), tight bends to Edwin Road from Colne Road, narrow road with on-pavement parking in Colne Road itself).

The local residents are really concerned about safety at this corner – it is already dangerous for children and adults crossing across the Greggs entrance from Gould Road to Crane Road (east side) and vice versa, or across Gould Road from north to south & vice versa, due to traffic speeding round the corner, and having to rapidly reverse because of oncoming traffic. Extra traffic exiting & entering here, with poor sightlines etc is only going to make it worse. One “traffic calming” measure just inside the site is not going to be adequate. Pedestrians would not be able to safely enter or exit the site here in any number. Further, the shared surface is particularly unsafe for children, families with pushchairs and the less abled, particularly when exiting from it onto “normal” streets where pedestrians don't have the “priority” that they supposedly do on the shared surface.

The applicant's "swept path analysis" shows vehicles entering/exiting through existing parking spaces on Gould Road & Crane Road, and partially across existing pavement on Gould Road. This surely cannot be approved by the Council as an acceptable highway's manoeuvre and needs to be carefully analysed.

Overall, the assumptions and conclusions are wholly inadequate and do not represent the actual traffic movements at this site and do not adequately reflect the reality of 116 new homes being built in this part of Twickenham. The roads are narrow and congested now so the impact of this proposal would be demonstrably harmful.

Paragraph 109 of the NPPF states that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". We trust that the Council's Highways team will robustly assess the applicant's TA and conclude that the impacts on existing residents would be severe and that this application should be refused on this ground.

Further, the proposed garages within the houses on block D are sub-standard in size (they should be 3m in width and are less than that) and therefore are unlikely to be used for the parking of cars and would put more pressure on the surrounding roads for cars to find spaces to park. Further, there is no space for visitors to park.

Overall, the parking situation is poor and would result in a severe impact on the local road network contrary to the NPPF and policy LP44 of the Local Plan and should be refused on this ground.

Lack of public benefits

The Planning Statement provides a list of the 'public benefits'. However, it fails to acknowledge or comment on the following:

1. No highway improvement to Gould & Crane Roads – and there would be a detrimental impact to these roads. There were no HGVs at this point, and the traffic volume in and out of the site would significantly increase;
2. Inadequate opening up of access and poor pedestrian access to the site;
3. Insufficient play space proposed for the number of houses and adults/children – especially as the proposed gardens are so small (out of keeping) and thus open space would be even more of a requirement for the future residents.
4. There has been a failure to properly open up the River Crane Corridor, or add connections to the long-distance footpath. The Local plan policies LP15 and LP18 set out that it is a "key priority to protect & enhance river corridors, promote biodiversity in and around the borough's rivers including the River Crane" and "Development adjacent to the river corridors will be expected to contribute to

improvements and enhancements to the river environment". Therefore, the development on the Greggs site should provide through site links to the riverside to enable public access and facilitate links to long distance footpath.

5. It is noted that the safeguarded area for potential future bridge link also uses up a lot of the only publicly accessible open space on site.
6. The majority of "amenity & play space" is on semi-private roof terraces which overlook neighbouring properties and their gardens. SPD for Small & Medium Housing Sites (4.2) states that "successful shared garden space will also need to bear in mind the orientation of the layout and effect of shade, favouring a southward facing aspect."
7. There is only a token gesture of public realm space which is also the play space in a north-facing corner of the site which will be overshadowed, not open or welcoming. The proposed boardwalk is only 1.5m wide and would be difficult to access as it would involve crossing a two way single lane road, with no separate pavement. Much of the boardwalk will be overshadowed for much of the year due to the scale of buildings to its south.
8. The play spaces the applicants reference are shown with distances that are misleading and assume direct walking routes and not needing to cross the river and railway. The only equipped play space within 10 minutes walking distance of site is at Kneller Gardens. Twickenham Green is an inappropriate play space given its location between two busy main roads and with no facilities.

Summary

- The proposed development is over-bearing, out-of-scale and out of character in relation to adjacent properties. It would result in a bulky, dense, out of scale and out of character design – more akin to an urban development alongside the wide open space of the Thames than one hemmed in within a site behind two storey Victorian cottages.
- The proposal represents cramped over-development which would result in significant harm to the local residents and results in a poor environment for future residents due to the limited garden sizes, lack of pavement, lack of open space and close proximity to each other.
- Detrimental impact on Gould Road houses - The close proximity of the terrace of houses (block G) in relation to the existing houses on Gould Road would result in overlooking, loss of light (into no.4 Gould Road and four other houses in the area), noise and disturbance and an unneighbourly form of development which would harm visual amenity and result in an overbearing form of development.
- The site is being developed up to 5 storeys when adjacent residential streets are modest two storey cottages (with loft conversions).
- It would be out of keeping with all current existing residential accommodation adjacent to the site.
- The proposed housing to rear of Gould Road has not adopted the back to back garden style of adjacent roads and proposes very small gardens which is also out of character with the prevailing development grain of the area.

- The proposed 5 storey building would be visually intrusive when viewed from many public viewpoints within the immediate vicinity and would appear as a blot on the landscape.
- Views north along Crane Road and east along Gould Road show massing out of keeping with existing skyline.
- Out of keeping with village feel of roads to north of Twickenham Green – more akin to an urban city centre or wharf style development.
- The proposed development would result in an unacceptably high density of development of the site with unacceptable provision of play space for the over 5s.
- The loss of space directly behind neighbouring properties.
- The amount of on-site parking proposed is insufficient for the number and size of the units proposed on the site and is therefore likely to put pressure on adjacent roads (outside CPZ hours) or on roads immediately outside the CPZ, or lead to illegal parking on double yellow lines in the area. We appreciate the Council has a maximum parking standard but the impact this development would have is such that a different approach should be made here to ensure that the future and existing residents do not experience severe traffic and parking problems.
- Density is out of keeping with density of development in Twickenham Green and will put too much pressure on existing services, traffic, transport infrastructure, schools, parks and play areas.

Overall, the proposal is considered to be contrary to policies LP1, LP2, LP8, LP15, LP18, LP31, LP39 and LP44 of the Local Plan 2018 and to NPPF which seeks sustainable development which should “meet the needs of the present without compromising the ability of future generations to meet their own needs”. This proposal categorically fails to comply with this important Government initiative.

For these reasons we respectfully request that this application is refused. In the event that you recommend permission we request that the Planning Committee make the decision so this application can be debated in the public realm and we can speak against the development to the Members of the Committee.

I trust you take the above into consideration when assessing the planning application.

Yours sincerely,

F M Jones

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cc. 4 Gould Road – Lorna Blakemore & David Roman

6 Gould Road - Cara Tetlow & Fraser Wilkin

8 Gould Road – Jon & Fleur Beeson

10 Gould Road - Philip Richards

12 Gould Road – Caroline & Ian Roberts

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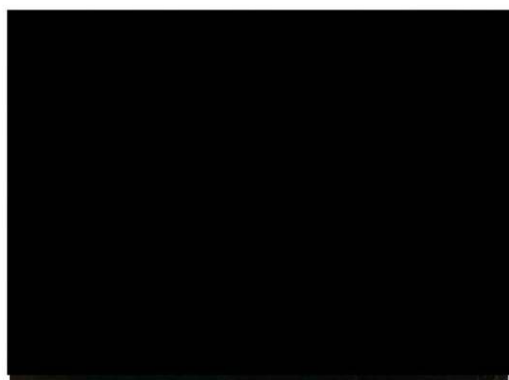
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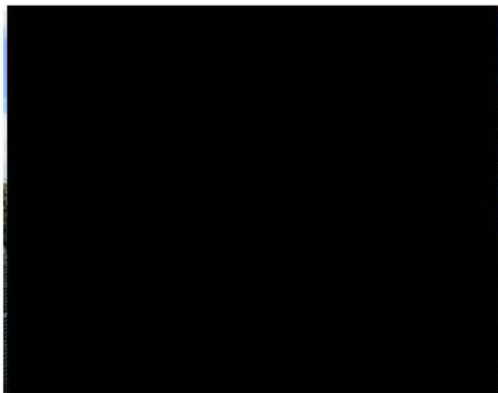
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View from rear of no.8 Gould Road

The proposed houses will be in very close proximity to our houses. The Supplementary Planning Document for Small and Medium Housing Sites gives a distance of 13.5m where there are non-habitable windows being proposed (this is only in relation to privacy, sunlight/daylight and overshadowing). It is accepted that there is unlikely to be harm from overshadowing due to the orientation of the houses north of our houses.

However, whilst the design of Block G has ensured there are no overlooking windows to our properties at first floor level, the height of the houses at 6.4m finished in metal and their close proximity will **harm our visual amenity and represent a poor outlook**. There is a concern about the height of the ground floor windows which could result in **overlooking**.

The rear wall of No.4 Gould Road is 7.6m from its rear boundary and the rear walls of Nos. 6, 8, 10 and 12 are 9.9m from their boundaries. The rear boundaries of these houses are separated from the boundary of the Greggs site by a 90cm wide shared alleyway. Thus, the proposed rear elevation of the houses would be within 10.5m and 12.8m from the rear of the existing houses on this part of Gould Road.

The rear French doors of the proposed houses would be sited less than 13.5m from our rear first floor windows and therefore the existing residents would be able to overlook into the rear of the houses with ease which is an unsatisfactory position to put the existing residents in. There is no mutual overlooking at present and this should not be allowed with this development.

Overall, we do not agree with paragraph 7.138 of the Planning Statement which states that "distances between properties offer a substantial improvement and are commensurate with the distances between buildings in the surrounding area" so the proposals "meet the aspirations of LP8 and have regard to LBRUT Residential Standards SPD." This clearly is not true for the residents of nos. 4-12 Gould Road who will have a much worse outlook and residential amenity.

The rear gardens of the houses on Block G are very small for 2 bedroom/4 person dwellinghouses and are out of keeping with the size of gardens in the immediate vicinity. The proposed gardens are 2m in depth and 5m wide. 10sqm of garden space is inadequate for this size of dwellinghouse and represents how

cramped and over-developed the site is. Further, the rear gardens are hard up to our boundaries and will result in **noise and disturbance** which will harm the peaceful enjoyment of our gardens and homes.

The main concern is the proposed density of development as a whole and how this would result in a cramped over-development of the site – the developers are simply trying to squeeze too many houses and flats on this site. One symptom of this over-development is the fact that the main access running through the scheme (accessed from Edwin Road but also via the corner of Gould Road and Crane Road) is not wide enough to include a pavement for the residents/visitors of the proposed housing. This is poor design and poor planning. Having a shared surface adjoining a corner with limited sightlines does not seem safe, particularly at the entrance to the site at the Gould Road/Crane Road corner.

The proposal also includes a large bin store and bicycle store hard up to the boundary with no.4 Gould Road and new house G4. This would be harmful to residential amenity resulting in noise, smells, light pollution and disturbance which would be unacceptable and unneighbourly.

For the reasons set out below, it is considered that the proposal is an unneighbourly form of development which will be harmful to the amenities of those in nos. 4-12 Gould Road due to its height, close proximity to the boundary and being overbearing and harming the outlook from their homes.

At the neighbour consultation meetings the developers implied that the development at Crane Mews sets a precedent for a building line close to our houses. However, this cannot be a fair and correct comparison. Crane Mews is certainly not representative of the pattern of development in this area and does not provide a good example of planning which should be repeated – i.e. development should not be hard up against the rear gardens.

Policy considerations

The development at the property fails to comply with the following policies. Due to the minor nature of this application the London Plan policies have not been referred to.

The National Planning Policy Framework (2019) states at paragraph 124 that “Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities” and that decisions should ensure that developments “are visually attractive as a result of good architecture, layout and appropriate and effective landscaping” (paragraph 127). The proposal fails to meet these national standards.

Local Plan (July 2018)

The main relevant policies relating to our objection are as follows:

Policy LP 1 ‘Local Character and Design Quality’ states “*Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local*

area” – This proposal fails to comply with this due to the scale, height and density of the proposal which bears little resemblance to the immediate area.

Policy LP 2 ‘Building Heights’ states:

The Council will require new buildings, including extensions and redevelopment of existing buildings, to respect and strengthen the setting of the borough’s valued townscapes and landscapes, through appropriate building heights, by the following means:

- 1. require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area;*
- 2. preserve and enhance the borough’s heritage assets, their significance and their setting;*
- 3. respect the local context, and where possible enhance the character of an area, through appropriate:*
 - a. scale – **fails to comply***
 - b. height - **fails to comply***
 - c. mass - **fails to comply***
 - d. urban pattern - **fails to comply***
 - e. development grain - **fails to comply***
 - f. materials - **fails to comply***
 - g. streetscape - **fails to comply***
 - h. Roofscape **fails to comply** and*
 - i. wider townscape and landscape” **fails to comply.***

Policy LP 8 ‘Amenity and Living Conditions’ which require a high standard of design and that developments are not visually intrusive or have an overbearing impact as a result of the height, massing or siting, including through creating a sense of enclosure.

Policy LP 15 ‘Biodiversity’ which sets out the Council will protect and enhance the borough’s biodiversity by “enhancing wildlife corridors for the movement of species, including river corridors, where opportunities arise; and maximising the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.

Policy LP 18 ‘River corridors’ states at criterion C that:

All development proposals alongside or adjacent to the borough’s river corridors should:

- a. Retain existing public access to the riverside and alongside the river; and
- b. Enhance existing public access to the riverside where improvements are feasible; or
- c. Provide new public access to the riverside where possible, and maintain existing points of access to the foreshore subject to health and safety considerations. There is an expectation that all major development proposals adjacent to the borough’s rivers shall provide public access to the riverside.

Policy LP 31 ‘Public Open Space, Play Space, Sport and Recreation’ states that the Council will require all major development proposals in the borough to meet the Public Open Space,

play space, and playing fields and ancillary sport facilities needs arising out of the development.

Policy LP 39 'Infill, Backland and Backgarden Development' identifies that all infill & backland development must reflect the character of the surrounding area and protect the amenity & living conditions of neighbours.

Policy LP 44 'Sustainable Travel Choices' states that the Council encourages high trip generating development to be located in areas with good public transport with sufficient capacity, or which are capable of supporting improvements to provide good public transport accessibility and capacity, taking account of local character and context.

Density

The proposed development has 102 units/ha & 344 hr/ha which equates to the ratio for habitable rooms for an Urban area. In our opinion (as local residents), this part of Twickenham is not an urban area but should be considered sub-urban for considering which density of housing should be acceptable.

The proposed development is much more akin to an urban city centre development than a residential development in infill/backland site behind two storey terraced cottages in an area acknowledged to have insufficient green space.

If the sub-urban ranges were utilised, the ranges would be: 40-80 u/ha & 150-250 hr/ha. The proposal **significantly** exceeds this on both counts. The developers need to re-consider this aspect which would consequently free up the site as a whole and ensure it was not so cramped and over-developed.

We will be guided by the Council's policy officers who are experts on the need for housing in this part of the borough and what the density and housing mix should be. It is our understanding that the Borough of Richmond-upon-Thames can demonstrate a 5.5 years housing land supply up to 2025 and therefore the Council will be meeting the Government's objective of significantly boosting the supply of homes. The proposal at the density sought is therefore not essential compared to parts of the country where housing is not coming forward to meet 5 year housing land supply.

We have read the Collier's Financial Viability Assessment from August 2017 which proposed 101 residential units (and commercial floorspace) and this was found to be a viable scheme. This demonstrates that a scheme with much fewer units is possible on this site (albeit the overall layout was not acceptable).

Character of area

The area is characterised by two storey traditional houses and the few developments higher than this in the immediate area does not set a precedent for such a large scale, high-rise, intensive urban development in a quiet series of residential terraced cottage streets. Below are photographs which demonstrate this point.

May Road looking east:

Current view:



Proposed view:



Crane Road looking north:

Current view:



Proposed view:



Residential amenity

The proposed terraced Block G would result in a 6.5m high building extending 22m along the back edge of our houses and rear gardens. This would result in an overbearing form of development which would loom over us as we seek to enjoy our private space. Further it would result in a loss of space and a view of trees and open skies beyond. Overall, it would result in making our outdoor space feel encroached upon and unwelcoming.

Further, as confirmed in the Daylight and Sunlight Assessment, there will 5 properties who will not fully adhere to the BRE Guidelines for daylight (VSC and NSL) and sunlight (APSH). This is clearly unacceptable and should be a reason to refuse the application. Of these five houses, one is no.4 Gould Road where the

Daylight and Sunlight Assessment confirms the kitchen would experience an alteration in daylight distribution of 32%, which is beyond the 20% outlined within the BRE Guidelines.

One of the residents of Gould Road is 1.96m tall and therefore, if he was standing in the kitchen of House G, he would be able to look directly into the gardens of 4-12 Gould Road, into the rear ground floor rooms and up into the 1st floor and 2nd floor rear bedrooms. Due to the very limited depth of the Block G gardens and the size of the doors, it is likely that overlooking could occur to the detriment of existing residents of Gould Road.

There is also a concern about light pollution from the security and safety lighting by the proposed cycle/bin store behind no.2 Gould Road, and at the entrance to site. The light spillage from the velux rooflights and rear French windows would also result in a considerable amount of light pollution in close proximity to the rear of Gould Road.

By virtue of the scale, siting and design of the proposed houses in such close proximity to the houses on Gould Road there is considered to be loss of amenity for neighbouring properties from overlooking, loss of outlook, light pollution, harm to visual amenity and loss of light. Further, as set out above, the rear gardens are hard up to our boundaries and will result in noise and disturbance which will harm the peaceful enjoyment of our gardens and homes. This is contrary to policy LP8 of the Local Plan.

Lack of play space

The proposal contradicts policy LP 31 as there is inadequate play provision on site with no provision at all for children over 5.

Currently, there are very few facilities for children aged over 5 locally (with just a couple of structures in Kneller Gardens - one climbing frame and a large swing probably intended for 5-12 year olds – one table tennis table, two basketball hoops (but not a full size basketball court as they imply in the planning documents) and three tennis courts (which children now have to book online if they want to use them , and will shortly be passcode locked to ensure they can't use them without booking). The facilities for older children is just not adequate in this area.

Policy LP31 requires major development to provide their own play facilities for children over 5 on site (where it is shown that there is inadequate play space within 400m of the site) and this has not been provided at this site. The new development by Twickenham Station has included facilities for over 5s – a full basketball court, football 'pitch'/court and skate park. Whilst a financial contribution may be provided by the developers to improve local play space this is not sufficient as more play space is required within this immediate vicinity rather than cash to improve existing facilities which are further than 400m away (such as Kneller Gardens which is 480m away).

Highways/parking issues

The Planning Statement accepts in paragraph 7.19 that “There are significant Site constraints associated with the Site within the residential area” and at 7.21 “the streets surrounding the Site are narrow residential streets and are often heavily parked on both sides”. Whilst the planning consultants seem to be concerned about the impact of the HGV vehicles on local residents, these comments are most appropriate in the context of the 100s of vehicles which will be added to this part of Twickenham if this development is granted planning permission. HGVs did not impact on the residents of Gould Road but having an entrance/exit into the housing development off Gould Road will result in a significant increase in traffic generation. This will be extremely harmful to local residents where parking stress is high at present and this will exacerbate it to an unacceptable level.

It is interesting to note that several years ago HGV traffic was prohibited to use Gould Road (it is understood this was after 2004 when HGV traffic ceased driving to this corner and a sign was erected on the Meadway entrance to Andover/Gould Road to confirm this). Further, the part of the Greggs site accessed from Gould Road only had 23 parking spaces and traffic to the site will be significantly increased if this development of this size occurs.

The Design and Access Statement provides walking distances to Twickenham and Whitton stations which are misleading as they range from 15 to 19mins and assume a very fast walker.

Paragraph 2.7 of the Design & Access Statement states that “The nearest bus stop is 5 minutes’ walk south of the site with three bus connections to various locations in Richmond.” The existing bus stop to the south referred to in the Transport Assessment (TA) (GL) is on a narrow pavement immediately outside Sainsburys. This bus stop is on an already over-congested narrow strip of pavement which is also frequently parked on at the bus stop location by delivery vehicles for Sainsburys. Stop GL in fact currently only offers two direct routes to Richmond (H22 & 490), and TFL have recently been consulting on changes to bus services from Twickenham, which would include termination of the H22 route in Twickenham. If these changes go ahead there will only be one direct service to Richmond from stop (GL), with other routes requiring changes in the centre of Twickenham. Most locals actually end up going to bus stops further into Twickenham (stop GP) on Heath Road, at a 8-10 minute walk from the site to the east. This is served by more bus routes and does currently offer three direct services to Richmond (R70, H22 & 490), however, this will reduce to two if the H22 route is to terminate in Twickenham.

This proposed housing development with limited car parking spaces (it is assumed to encourage use of public transport) will put a huge pressure on the bus routes and train services which are already over-crowded.

Existing bus services are already heavily overcrowded at key commute times, and particularly poorly served for pupil commutes to school.

The TA confirms that the proposals will not lead to increases in traffic and will not impact upon parking in the surrounding area in accordance with Policy LP8 and LP44 and concludes “the proposals will not impact negatively upon the area or create conditions prejudicial to the transport network, highway safety or neighbouring amenity”. The TA assessed the trip generation from a factory in Brent and did not use data from this Greggs site.

We request that the Highways department carefully assess the proposal for construction traffic to use Andover/Gould Road as one of its two access ways and the Gould Road/Crane Road entrance as one of the two entrances to the site. This is due to the clear unsuitability of the road and an entrance for that purpose, and the fact that the Council itself has already erected a sign at the Meadway and of the road saying that the road ahead is unsuitable for large vehicles.

Also, of utmost relevance are the following points:

- The CPZ is not 24/7 and visitors from the Richmond Borough will be able to use their own visitors permits to park here;
- There are few passing places on Gould Road & Crane Road, meaning that the road becomes a rat run, with road rage on the corner quite a common occurrence;
- It is not just the car yield of residents, but also their visitors, service & delivery vehicles, taxis if they can't have cars etc (due to “limitations” on parking) which needs addressing;
- Waiting delivery vehicles are already a big problem here in creating congestion in two-way single lane roads;
- The increase in numbers of vehicles idling on the corner of Gould & Crane Roads due to congested roads – there would be increased noise & pollution immediately outside our homes and children's bedrooms following this development;
- The pinch points at Gould/Crane Road, Edwin Road corner, May Road (narrow road access from Twickenham Green), Knowle Road (narrow road access from Twickenham Green) and Colne Road (narrow road access from Heath Road frequently blocked by vehicles parked/waiting on double yellow lines), tight bends to Edwin Road from Colne Road, narrow road with on-pavement parking in Colne Road itself).

The local residents are really concerned about safety at this corner – it is already dangerous for children and adults crossing across the Greggs entrance from Gould Road to Crane Road (east side) and vice versa, or across Gould Road from north to south & vice versa, due to traffic speeding round the corner, and having to rapidly reverse because of oncoming traffic. Extra traffic exiting & entering here, with poor sightlines etc is only going to make it worse. One “traffic calming” measure just inside the site is not going to be adequate. Pedestrians would not be able to safely enter or exit the site here in any number. Further, the shared surface is particularly unsafe for children, families with pushchairs and the less abled, particularly when exiting from it onto “normal” streets where pedestrians don't have the “priority” that they supposedly do on the shared surface.

The applicant's "swept path analysis" shows vehicles entering/exiting through existing parking spaces on Gould Road & Crane Road, and partially across existing pavement on Gould Road. This surely cannot be approved by the Council as an acceptable highway's manoeuvre and needs to be carefully analysed.

Overall, the assumptions and conclusions are wholly inadequate and do not represent the actual traffic movements at this site and do not adequately reflect the reality of 116 new homes being built in this part of Twickenham. The roads are narrow and congested now so the impact of this proposal would be demonstrably harmful.

Paragraph 109 of the NPPF states that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". We trust that the Council's Highways team will robustly assess the applicant's TA and conclude that the impacts on existing residents would be severe and that this application should be refused on this ground.

Further, the proposed garages within the houses on block D are sub-standard in size (they should be 3m in width and are less than that) and therefore are unlikely to be used for the parking of cars and would put more pressure on the surrounding roads for cars to find spaces to park. Further, there is no space for visitors to park.

Overall, the parking situation is poor and would result in a severe impact on the local road network contrary to the NPPF and policy LP44 of the Local Plan and should be refused on this ground.

Lack of public benefits

The Planning Statement provides a list of the 'public benefits'. However, it fails to acknowledge or comment on the following:

1. No highway improvement to Gould & Crane Roads – and there would be a detrimental impact to these roads. There were no HGVs at this point, and the traffic volume in and out of the site would significantly increase;
2. Inadequate opening up of access and poor pedestrian access to the site;
3. Insufficient play space proposed for the number of houses and adults/children – especially as the proposed gardens are so small (out of keeping) and thus open space would be even more of a requirement for the future residents.
4. There has been a failure to properly open up the River Crane Corridor, or add connections to the long-distance footpath. The Local plan policies LP15 and LP18 set out that it is a "key priority to protect & enhance river corridors, promote biodiversity in and around the borough's rivers including the River Crane" and "Development adjacent to the river corridors will be expected to contribute to

improvements and enhancements to the river environment". Therefore, the development on the Greggs site should provide through site links to the riverside to enable public access and facilitate links to long distance footpath.

5. It is noted that the safeguarded area for potential future bridge link also uses up a lot of the only publicly accessible open space on site.
6. The majority of "amenity & play space" is on semi-private roof terraces which overlook neighbouring properties and their gardens. SPD for Small & Medium Housing Sites (4.2) states that "successful shared garden space will also need to bear in mind the orientation of the layout and effect of shade, favouring a southward facing aspect."
7. There is only a token gesture of public realm space which is also the play space in a north-facing corner of the site which will be overshadowed, not open or welcoming. The proposed boardwalk is only 1.5m wide and would be difficult to access as it would involve crossing a two way single lane road, with no separate pavement. Much of the boardwalk will be overshadowed for much of the year due to the scale of buildings to its south.
8. The play spaces the applicants reference are shown with distances that are misleading and assume direct walking routes and not needing to cross the river and railway. The only equipped play space within 10 minutes walking distance of site is at Kneller Gardens. Twickenham Green is an inappropriate play space given its location between two busy main roads and with no facilities.

Summary

- The proposed development is over-bearing, out-of-scale and out of character in relation to adjacent properties. It would result in a bulky, dense, out of scale and out of character design – more akin to an urban development alongside the wide open space of the Thames than one hemmed in within a site behind two storey Victorian cottages.
- The proposal represents cramped over-development which would result in significant harm to the local residents and results in a poor environment for future residents due to the limited garden sizes, lack of pavement, lack of open space and close proximity to each other.
- Detrimental impact on Gould Road houses - The close proximity of the terrace of houses (block G) in relation to the existing houses on Gould Road would result in overlooking, loss of light (into no.4 Gould Road and four other houses in the area), noise and disturbance and an unneighbourly form of development which would harm visual amenity and result in an overbearing form of development.
- The site is being developed up to 5 storeys when adjacent residential streets are modest two storey cottages (with loft conversions).
- It would be out of keeping with all current existing residential accommodation adjacent to the site.
- The proposed housing to rear of Gould Road has not adopted the back to back garden style of adjacent roads and proposes very small gardens which is also out of character with the prevailing development grain of the area.

- The proposed 5 storey building would be visually intrusive when viewed from many public viewpoints within the immediate vicinity and would appear as a blot on the landscape.
- Views north along Crane Road and east along Gould Road show massing out of keeping with existing skyline.
- Out of keeping with village feel of roads to north of Twickenham Green – more akin to an urban city centre or wharf style development.
- The proposed development would result in an unacceptably high density of development of the site with unacceptable provision of play space for the over 5s.
- The loss of space directly behind neighbouring properties.
- The amount of on-site parking proposed is insufficient for the number and size of the units proposed on the site and is therefore likely to put pressure on adjacent roads (outside CPZ hours) or on roads immediately outside the CPZ, or lead to illegal parking on double yellow lines in the area. We appreciate the Council has a maximum parking standard but the impact this development would have is such that a different approach should be made here to ensure that the future and existing residents do not experience severe traffic and parking problems.
- Density is out of keeping with density of development in Twickenham Green and will put too much pressure on existing services, traffic, transport infrastructure, schools, parks and play areas.

Overall, the proposal is considered to be contrary to policies LP1, LP2, LP8, LP15, LP18, LP31, LP39 and LP44 of the Local Plan 2018 and to NPPF which seeks sustainable development which should “meet the needs of the present without compromising the ability of future generations to meet their own needs”. This proposal categorically fails to comply with this important Government initiative.

For these reasons we respectfully request that this application is refused. In the event that you recommend permission we request that the Planning Committee make the decision so this application can be debated in the public realm and we can speak against the development to the Members of the Committee.

I trust you take the above into consideration when assessing the planning application.

Yours sincerely,

F M Jones

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