Comment on a planning application

Application Details

Application: 19/0646/FUL

Address: GreggsGould RoadTwickenhamTW2 6RT

Proposal: 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.

Comments Made By

Name: Ms Cara Tetlow

Address: 6 Gould Road Twickenham TW2 6RS

Comments

Type of comment: Object to the proposal

Comment: PLEASE NOTE THAT OUR OBJECTIONS HAVE ALSO BEEN SUBMITTED IN A LETTER FROM FIONA JONES of CAMERON JONES PLANNING on behalf of 4, 6 ,8, 10 & 12 GOULD ROAD, sent by email on 5 April 2019 – the content of which is copied in our online submissions.

PART 4/10

Policy considerations (cont.)

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).