

Ms J Simpson  
Development Management Dept  
London Borough of Richmond Upon Thames  
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Twickenham  
TW1 3B

56 Crane Road  
Twickenham  
Middlesex  
TW2 6RY

9<sup>th</sup> April 2019

Dear Ms Simpson

**Reference | Application 19/0646/FUL for Residential Development at former Greggs site**

We are writing in regard to the above application and the potential impacts relating to our privacy and amenity. We live at 56 Crane Road, directly on the Gould Road corner junction area of the proposed redevelopment. We see the proposed redevelopment as having a significant detrimental impact on our amenity and privacy.

I personally met with the developers at both consultation meetings and they spent a couple of hours with me at our house to review the potential issues that could arise from the proposed development. We are glad to see that the revised plans that have been submitted are in line with the considerations that the consultants said they would include, namely

1. Reduction in the number windows and balconies directly overlooking our garden.
2. Retention of a wall that runs along the northern boundary of our garden.
3. Improvements to the planned roof top gardens that will border our property to the north and east.

Whilst we are grateful for the consideration given to us by the developers and are wholly supportive of the redevelopment of this site and the removal of what is fast becoming a derelict factory, there are some key impacts that we would like to bring to your attention. We kindly request that the council take these into careful consideration when reviewing and deciding upon the application.

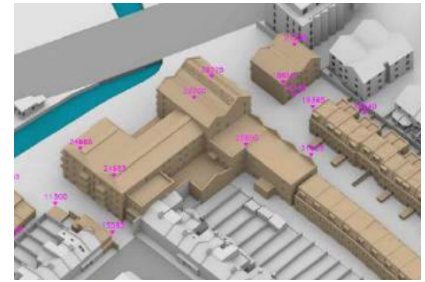
We would also like to take the opportunity to invite you or your colleagues to visit our property when taking these points into consideration, as this may help you better assess the impacts as we see them.

Our concerns cover a number of areas, which we expand upon in this document. These include;

1. Impact on Existing Privacy due to overlooking.
2. Existing Boundary Wall retention.
3. Daylight and Sunlight Assessment.
4. Impact on the Local Character of the area due to the Scale and Density.
5. Impact on Existing Local Services.
6. Impact on Controlled Parking Zone.
7. Safe Disposal of Hazardous materials.
8. Disturbance during Construction.
9. Benefits for the Local Community.

**1. Impact on Existing Privacy due to overlooking**

Below is the side aspect view of the proposed development of flats towards the Gould Rd / Crane Rd end of the site. The lightly shaded house and garden/trees is our property, 56 Crane Road. As can be seen in the diagram our property will be dwarfed to the side and rear by a combination of 3,4 and 5 storey developments, all with access to roof top gardens that will directly overlook into our garden and property. This will result in a significant loss of amenity and we believe is contrary to Policy LP8 in the Local Plan adopted in 2018.

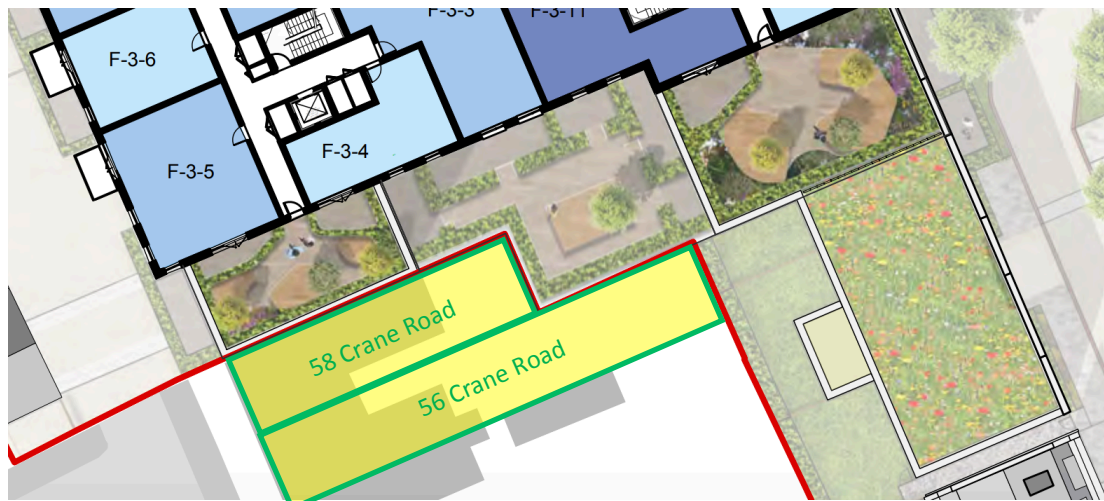


From what we can see from the latest plans submitted, the development to the rear of our property is right to the edge of the boundary with roof top communal gardens built on what is effectively the 4<sup>th</sup> floor level. This gives us serious concerns that our property will be excessively overlooked by the proposed development and have a very large impact on our existing privacy and amenity. The developer is stating that they have reduced windows but the appearance of what appears to be a roof top garden is a concern as it will directly overlook our garden and into our kitchen. The current view from our kitchen is shown below and the height of the proposed development appears to exceed the current roof height by another storey, with its maximum height in much closer proximity to our property than the apex of the roof of the existing building.



In the Design and Access Statement 4 page 1 (listed as page 41), reference is made to Crane Road resident's privacy and aspect. It states that the number of windows were reduced in size or removed altogether, which is very much appreciated. The fact that some windows are still there will likely cause a detrimental affect to our amenity by their close proximity to our boundary.

Both 56 and 58 Crane Road have bedrooms in our loft conversions. In summer time is common to sleep with windows open due to the heat. It is therefore quite concerning to see roof tops gardens being proposed in such close proximity to these existing bedrooms. This can be seen in the below diagram, from the proposal, 'Proposed Third Floor Plan'.



We appreciate that Roof Top gardens form part of the 2018 adopted Local Plan guidelines, but we would hope that the intention is not that they are massed in such a way as to surround and overlook existing properties, causing significant overlooking to existing properties and their gardens. We do not see that perimeter planting of shrubs on the rooftop will mitigate any overlooking of our garden by residents using these roof top gardens. The proposed layout will also result in light and noise disturbance, which will harm the peaceful enjoyment of our garden, our home and potentially our ability to get a good nights sleep.

Put simply our concerns here are threefold, that;

Residents in these new properties will be able to look directly down into our garden and home, seriously impacting our existing privacy levels.

1. Our amenity will potentially be impacted by noise, light and smoke pollution should these gardens be used for parties, BBQ's and residents smoking outside of the property during the day or night.
2. We also fear that rubbish may end up being thrown into our garden from these roof top gardens.

**We ask that the Council request that the roof top gardens in close proximity to existing properties are removed from the plans and replaced with roof lines in keeping with the existing properties.**

## **2. Existing Boundary Wall retention.**



We are happy that the February 2019 proposal retains the wall that adjoins the boundary of our property and shown above with the trees that we have planted alongside it. This had formed part of discussions we have had with the developer in late 2018 and we are glad that this is still retained. In the latest proposal however it makes mention of then being retained “if structurally possible”, which is not a firm commitment to retain a wall.

**We would ask that the council ensure that the developer make ‘like for like’ replacement a condition of any approval granted to the application, should the existing wall be found to not be structurally sound.**

## **3. Daylight and Sunlight Assessment**

As lay people we could not easily follow the Daylight and Sunlight assessment, but Blocks A and F appear significantly higher than the existing building so it would seem reasonable to assume that daylight and sunlight will be reduced to our house and garden, despite our property not being mentioned anywhere in the report. The mansard roof on the 4 storey section of the block would seem to have a big impact on sunlight/daylight towards the end of the day.

**We ask that the council follow the spirit and intent of Policies LP2 and LP8 with regards to preventing overbearing development not in keeping with existing local rooflines.**

## **4. Impact on the Local Character of the area due to the Scale and Density.**

The local area in which we chose to live is very much that of a suburban residential street with a good community feel. The majority of the houses are two storey cottages, with some having loft conversions to add extra bedroom space. The scale and density of the proposed development however, is simply not in keeping with the local area, it feels more in keeping with a heavily populated urban area.

If you look at recent new developments in the area such as Barneby Close, TW2, these are predominantly two storeys with occasional elements of three storey built into the roofline. Additionally Alcott House at the end of Norcutt Road is three storeys with pitched roof. We believe this is covered in Policy LP2 of the adopted local plan, whereby the intention is that new developments are designed to be ‘generally reflecting the prevailing building heights within the vicinity’. We appreciate that there is room in LP2 for extra height, but these buildings do not appear to deliver in the way that this additional part of the policy outlines.

The proposed development of 4 and 5-storey residential accommodation in such close proximity to existing dwellings is simply not in keeping with the local area and will have a very detrimental impact on the existing dwellings. All of the images put forward by the developer show that existing properties would be dwarfed and significantly overlooked by these new buildings. This can be seen below in the before and after pictures where the new flats appear to have a significant visual intrusion and overbearing impact.



What would be more preferable would be that the developer continue the existing roof lines of the surrounding streets and keep the population density in keeping with the existing local footprint. This would also significantly reduce the likelihood of overlooking and reduced privacy for existing residents.

We support the Gould Road resident's comments that this does not seem to be a very neighbourly form of development and has significant potential impact on the local residents and community.

**We ask that the council do not allow such height and density of development to be allowed so close to existing dwellings and look for more acceptable design options from a scale and density perspective.**

## 5. Impact on Existing Local Services

Some local services are already under pressure and this will pressure will be further exacerbated if the development is allowed to proceed at the current levels. There is mention of the local bus stop within 5 minutes walking distance with 3 bus routes to Richmond. I often use this bus stop to head to Richmond and find that if you do not arrive before 6:30am you are unlikely to get on the buses, as they are already full. Of the two (not three) Richmond services that do go from this stop (490 and H22) one is under consultation for potential termination of route in Twickenham instead (H22). To allow such densely populated additional residential development with limited parking will clearly put further pressures on this already stressed local public transport infrastructure.

**We therefore ask that the council push for a development of lower density to reduce impact on local services.**

## 6. Potential Impact on Controlled Parking Zone (CPZ)

With the proposed redevelopment adding 116 residential units (including some 4 bedroom units) and only 115 parking spaces we are concerned of the impact that this could have on the recently introduced TW Controlled Parking Zone. The current CPZ runs 8am to 6:30pm Monday to Saturday and although the new residents will not be able to apply for CPZ permits it is likely that there will be impact on parking outside of the current controlled times.

**We ask that the council consider development at a lower density and extension of our CPZ hours to reduce adverse impact on existing residents ability to park near their homes.**

## 7. Safe Disposal of Hazardous materials

One of the major concerns of the community is the safe disposal of any hazardous waste that is located on the site. There is a grave concern that the roof materials of the factory may contain asbestos and as such the local residents are very concerned that this is removed in a way that does not have a detrimental impact on the health of the existing population, which includes a large number of children.

**We ask that the council push for the most stringent measures be taken for the safe demolition and removal of hazardous materials where they exist to ensure the protection of the health of local residents.**

## 8. Disturbance during Construction

The location of the site is not ideal for heavy goods traffic and this was partly the reasoning for Greggs relocating to a site with better levels of access for their lorries. Gould Road already benefits from an advisory warning on the junction with Meadway and Andover Rd. Nevertheless, the junction of Crane and Gould is often jammed with lorries that have ignored or not seen this sign and are incapable of turning from Gould into Crane Road. To hear that the Greggs Admin office entrance on this junction will now be used for site access for lorries is a worry, not just on safety grounds but the potential property damage that may arise from the vibration from heavily laden lorries passing within feet of residential properties not built to cater for such vibration and disturbance.

**We ask that all site traffic be directed through the main entrance located on Edwin Road where the modern road infrastructure is wider and better equipped to handle this type of traffic.**

## 9. Benefits for the Local Community

Having been actively involved in the consultation process for the redevelopment of this brown field site we are surprised to see no mention of Section 106 Agreements in any way to help benefit the local community. Instead, the development seems to rely heavily upon existing local amenities such as Kneller Gardens and Twickenham Green as rationale for not adding more green space and play space within the proposal.

**We ask that the Council hold the developer to account to ensure that appropriate benefits are drawn for the local community.**

As stated at the start of this letter, we thoroughly support the redevelopment of this industrial factory site into residential properties, but we kindly ask that consideration is given to, and any planning permission is made subject to a number of conditions, as outlined below;

1. Reduction in height of the flats proposed towards the rear and side of our property, ensuring that they are in keeping with existing property rooflines instead of dwarfing them, (Policy LP2 and LP8) thus protecting amenity, privacy and no impact on current access to daylight and sunlight.
2. Roof top gardens in close proximity to existing dwellings are removed from the plans and replaced with rooflines in keeping with local character.
3. Retention of the boundary wall adjoining 56 Crane Road, as promised by the developer and shown in the diagram on page 1, or replacement with like for like if not structurally feasible with the existing wall.
4. The Scale and Density of the development is reduced in keeping with local plan guidelines and potential overlooking and privacy issues are removed as a result of this.
5. Reduced density of development to reduce impact on local services.
6. Appropriate covenants are put in place to ensure the safe disposal of hazardous waste from the site.
7. Ensure that Edwin Road is used as the site access for construction traffic, in keeping with when it was an operation site for Greggs.
8. Extension of the Controlled Parking Zone times to prevent negative impact on the recently introduced scheme.
9. Consideration of Section 106 gains to benefits the local community, e.g. infrastructure or facilities improvements in the local area.

Yours sincerely

Claire & Stephen Carter