



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

27th November 2019

Dear Mr Faherty

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

I write further to the amendments which have been submitted to the planning application for the above named address. Please consider our previous letter of objection sent on 5th April 2019 which raises all the concerns on behalf of residents from nos. 4, 6, 8, 10 and 12 Gould Road.

Paragraph 130 of the NPPF states that "Permission should be **refused** for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions". This application represents poor design as it would not improve the character or quality of this area of Twickenham.

The scheme is unacceptable in a number of ways and the amendments to the proposals have not addressed our concerns in the following ways.

In summary, the amendments:

1. Do not at all address any of our objections with respect to the Block G houses to the rear of the Gould Road houses – in fact, the amendments to the block G houses are minimal. The proposal will still result in a harmful outlook from the Gould Road houses which 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). The close proximity of these proposed houses will result in harm to the visual amenity of the Gould Road residents, creating a sense of enclosure and result in overlooking to their homes from the proposed windows;
2. Show an inconsistency between the amended Design and Access Statement and the Proposed Ground Floor Landscape General Arrangement where the former states the rear garden to the Block G houses as a 'terrace' whereas the plan shows this area as 'Amenity lawn' (P8). The documents state that the amendments include an increase in garden sizes for the houses, yet the gardens for Block G remain unchanged;
3. Show another inconsistency where the D&A statement states: "The development of the Greggs Bakery site will still offer a total of 116 homes within townhouses and apartment buildings with heights ranging between 2 and 5 storeys", thus accepting that there are 2 storeys but on page 12

the D&A Statement states "Complete redesign of the building backing the Gould Road houses, from a two storey apartment building with roof, to single storey two bedroom houses with a bedroom within the roof space". It is unclear what has been completely redesigned in this respect as the houses remain as 2 storey buildings (as confirmed in the first paragraph above);

4. The D&A Statement concludes at section 2.2 that "Where direct overlooking is possible the buildings have been located more than 20m from the neighbours". However, this is not the case for the houses between Gould Road and Block G where there is direct overlooking;
5. Do not adequately address our concerns with respect to the Block F apartments to the east of the Gould Road terrace (with respect to overlooking from balconies, or the imposing nature of the block at 4 storeys high);
6. Do not address our concerns about traffic and safety etc at the corner of Gould Road and Crane Road;
7. Do not adequately or safely increase usable public realm or playspace - the images show small playspaces dotted around the development and appear as after-thoughts rather than carefully designed playspaces which will provide adequate space for all children on the site – the developers state that they have increased the play space in the amended proposals but appear to have simply now included the riverside walkway in their calculation of the area available. A narrow riverside walkway sandwiched in between a river and hedge is clearly not an appropriate playspace for children and should not be considered as such;
8. Do not address our concerns about the hemmed in north-facing and overshadowed area to the north-east of the site (the area's main playspace); Do not address our concerns about the proposals' failure to properly open up access to the River Crane, given that the riverside walkway is narrow and hemmed in behind a box hedge, only accessible across a 2-way road, and that the design of Block F with its protruding balconies visually narrows the view from Crane Road into the site, rather than opening up views towards the river;
9. Do not address our concerns about 2-way traffic through the site;
10. Include references to the extension of a perimeter wall around the site to prevent overlooking from the Block F flats without any explanation of what this means and its implications (e.g. further hemming in the Gould Road houses);
11. Further reduce the provision of on-site parking by 15 spaces, leading to 0.86 (rather than 0.99) spaces per unit;
12. Trip generation figures are stated to be unchanged – we still feel these are woefully underexaggerated;
13. Public transport is **not** good here, there is consultation to remove buses (which are over-capacity at peak times), the train network is over-capacity, and the Greggs site's own marketing report

- (produced by Milestones) states that commercial premises won't work here without parking, yet they have only provided one space for the non-residential premises, with no visitor parking;
14. The continued lack of visitor parking is going to lead to dangerous parking, congestion etc within the site, and pressure on roads adjacent to the site;
 15. Do not adequately change the design or massing of Block F at the corner of Gould Road & Crane Road, making only very minimal changes to materials and slightly angled/lowered walls, leading to an ugly design which remains out of keeping with the adjacent two storey terraces;
 16. The D&A Statement includes new images of the massing at the corner which show balconies on the Block F flats directly adjacent to no. 58 Crane Road, which would look directly into the windows of the first floor room and loft bedroom of 58 Crane Road;
 17. Do not properly address our concerns about the over-density of the development. The number of units is reduced from 362 to 343 habitable rooms/hectare, but remains 103 units/hectare and they say that this is consistent with the local area using Norcutt and Hamilton Roads as comparators. However, these roads are not representative of the majority of streets in this area as Norcutt and Hamilton Roads are more densely packed with significantly smaller gardens than the adjacent streets;
 18. Do not address the alteration of daylight distribution by the proposed development to the rear room of 4 Gould Road, which still exceeds BRE guidelines;
 19. Do not confirm whether any changes have been made to the proposed bin store (to which we objected) in the rear section of the garden of no.2 (which appears to still be present on some of the images in the new documents provided, but not in others);
 20. The developers are using child yield figure of 52. However, as attached, using the London Mayor's child yield matrix, the figure should be 69. Therefore, the play space on site is woefully inadequate for the number of children predicted to live within this housing development.

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.

To overcome many of the above objections, we suggest the application is amended (as a minimum), as follows:

- no vehicular access to the site at the junction of Crane Road/Gould Road;
- reduced massing/no. of storeys of Block F, with setting back from the currently proposed building line both to the north and west of the block and removal of west facing balconies;

- reduction of number of units on the site, addition of underground parking below Block F, addition of visitor parking and adequate parking for the commercial premises; and
- removal of Block G houses in their entirety to make space for a true riverside park at the north-west corner of the site, extending along the northern part of the site to fill in the entire northern sector between Block F and the riverside (i.e. removing the road to the south of the river).

We request that this application is refused or withdrawn and re-submitted having carefully addressed the above points. If the application is reported to the Planning Committee, we reserve the right to speak against the application.

Yours sincerely,

Fiona Jones

Mrs Fiona Jones BSc(Hons) BTP MRTPI

