Reference: FS162471728

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: Friends of the River Crane Environment Dr Gary Backler

Address: Community Centre 13 Rosslyn Road Twickenham TW1 2AR

Comments

Type of comment: Object to the proposal

Comment: FORCE has reviewed the revised drawings and documents submitted on 4 November 2019, and on behalf of our 600 members we continue to OBJECT to this proposal. This response should be read in conjunction with our OBJECTION submitted in April 2019.

We welcome the proposal to implement a "bespoke sensitive lighting strategy to ensure the 'dark corridor' status of the River Crane is not impacted." We trust that this will be enforced. This strategy is required not merely during the construction phase, but on an ongoing basis once the residences are occupied.

We welcome the proposal to liaise with FORCE during construction, and trust that this will be a participative process rather than merely "for information."

We welcome the proposed ecological enhancements, in particular the improvements to the River Crane. We trust that the Council will ensure that the developer makes a material contribution to these improvements, and that agreed improvements are implemented.

We note that further ecological surveys are still required for bats and nesting birds.

We still believe the proposal represents an overdevelopment of this constrained and sensitive site. The proposal will add 116 new housing units and a potential population of around 400. Yet the proposal still offers no provision for on-site play facilities, for any age group, other than an amenity lawn. This throws all the burden of recreational use onto existing open spaces, including in particular Craneford West Field, Kneller Gardens, Twickenham Junction Rough and Mereway Nature Reserve. Following upon the construction of 180 residential units with minimal recreational facilities in the redevelopment of the Richmond Education and Enterprise Campus, we believe the burden on existing open spaces is unacceptable. Our April 2019 proposals for improvements to adjacent public open spaces must be implemented as a sine qua non for this proposal.

In the proposal, the highest blocks are still 5 storeys high. These blocks are the ones situated closest to the river, with at least 8 balconies overlooking the river. They are alongside a run of 4-storey blocks overlooking the river. Thus, the proposal still locates the highest blocks nearest the river, therefore still imposing unacceptable massing on the river vista.

Despite the recognition in the Ecology Report of the sensitivity of the River Crane as a dark corridor, the proposal still generates light spillage into the dark corridor, from the apartment windows of the 4-5 storey blocks whenever illuminated, as well as from the fixed side lights which will presumably stay illuminated all night. The 4-storey block will still leak light above ground-floor level, and the proposed use of dark grey metal and black timber will not mitigate this. The 4 units at

the western extremity of the site are even closer to the river, and will leak light from ground floor and first floor windows, although at least they do not have the mass of the main 4-5 storey block. The proposed riverside walk is broader, but car traffic is likely to leak light and noise through the proposed riverside planting and into the dark corridor at all times of the night, especially in winter when leaf cover is removed.

Much of the proposed riverside planting appears to comprise timber decking and grasscrete with gravel infill. Much more natural planting of native species would be ecologically valuable. There should also be a clear plan for maintenance of the lawn and other on-site greening.

We assume the developer will provide stair access into the river channel at intervals and to a specification agreed with the Environment Agency. This will facilitate litter removal from the river and enable promotion and monitoring of the river ecology.

Our April 2019 comments concerning sewerage and litter impacts remain unaddressed.