3.0 AVR VIEWS

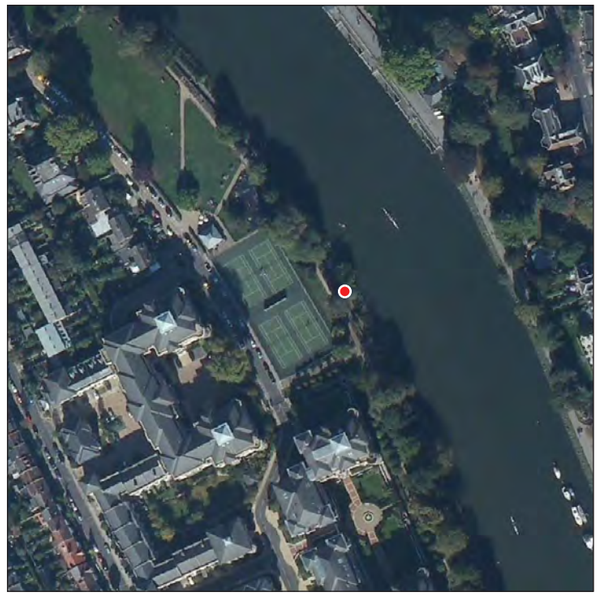
Viewpoint I - River Thames Path, near Richmond Bridge Estate / Pelabon Gardens, looking east - Proposed View - AVR Level 1

3.0 AVR VIEWS

Viewpoint J - River Thames Path, near tennis courts - Verification Data

Viewpoint Reference	Description and Direction of View	AVR Level	Method	Easting	Northing	Height (mAOD)	Tripod Height (m)	Camera	Lens	Focal Length	Orientation	HFOV	Date	Time
J	River Thames Path, near tennis courts, looking east.	AVR1	Verified	517848.47	174300.81	4	1.60	Canon 6D Mark II	Canon f/1.4 50mm	50mm	Landscape	39.6°	22/03/2021	14:59

Survey Reference Points



Viewpoint Location

Tripod Set-up Location

3.0 AVR VIEWS

Viewpoint J - River Thames Path, near tennis courts, looking east - Existing View

3.0 AVR VIEWS


Visible Extent of Proposed Development
Non Visible Extent of Proposed Development
Viewpoint J - River Thames Path, near tennis courts, looking east - Proposed View - AVR Level 1

3.0 AVR VIEWS

Viewpoint K - River Thames Path, southern edge of Cambridge Gardens - Verification Data

Viewpoint Reference	Description and Direction of View	AVR Level	Method	Easting	Northing	Height (mAOD)	Tripod Height (m)	Camera	Lens	Focal Length	Orientation	HFOV	Date	Time
K	River Thames Path, southern edge of Cambridge Gardens, looking south east.	AVR1	Verified	517799.84	174377.31	4	1.60	Canon 6D Mark II	Canon f/1.4 50mm	50mm	Landscape	39.6°	22/03/2021	14:55

Survey Reference Points

Viewpoint Location

Tripod Set-up Location

3.0 AVR VIEWS

Viewpoint K - River Thames Path, southern edge of Cambridge Gardens, looking south east - Existing View

3.0 AVR VIEWS

Viewpoint K - River Thames Path, southern edge of Cambridge Gardens, looking south east - Proposed View - AVR Level 1

3.0 AVR VIEWS

Viewpoint L - Terrace Gardens, eastern edge overlooking Bulbous Betty sculpture - Verification Data

Viewpoint Reference	Description and Direction of View	AVR Level	Method	Easting	Northing	Height (mAOD)	Tripod Height (m)	Camera	Lens	Focal Length	Orientation	HFOV	Date	Time
L	Terrace Gardens, eastern edge overlooking Bulbous Betty sculpture, looking north west.	N/A	Non-Verified	518212.90	174170.15	37	1.60	Canon 6D Mark II	Canon f/1.4 50mm	50mm	Landscape	39.6°	22/03/2021	13:35

Survey Reference Points (No Survey points taken from this location)

Viewpoint Location

3.0 AVR VIEWS

Viewpoint L - Terrace Gardens, eastern edge overlooking Bulbous Betty sculpture, looking north west - Existing View

3.0 AVR VIEWS

Viewpoint L - Terrace Gardens, eastern edge overlooking Bulbous Betty sculpture, looking north west- Proposed View (No view prepared from this location due to insufficient alignment points)

APPENDIX A AVR METHODOLGY

Overview

The generation of AVRs (also known as verified views) for the proposed redevelopment of Howson Terrace, Richmond, London was carried out by Pegasus Planning Group.

Pegasus Planning Group use methodologies compliant with relevant sections of the current guidelines for photography, photomontage and AVR production included within:

- The Landscape Institute/IEMA Guidelines for Landscape and Visual Impact Assessment (3rd edition 2013);
- The Landscape Institute Advice Note 01/11 Photography and Photomontage in Landscape and Visual Impact Assessment;
- London View Management Framework Supplementary Planning Guidance (March 2012); and
- Scottish Natural Heritage (SNH) Visual Representation of Wind Farms (December 2014, Version 2.1).

The AVRs within this document have been produced using a consistent methodology using Camera Matching techniques. Camera matching is the process of replicating real-world camera parameters (position, orientation, projection and focal length) in a 3d virtual environment, enabling the production of mass models and photo-realistic renders of development proposals to be overlaid on baseline photography to the correct scale and orientation.

Definition and Classification of AVRs

The London View Management Framework: Supplementary Planning Guidance (March 2012) defines an AVR as:

"An AVR is a static or moving image which shows the location of a proposed development as accurately as possible; it may also illustrate the degree to which the development will be visible, its detailed form or the proposed use of materials. An AVR must be prepared following a well-defined and verifiable procedure and can therefore be relied upon by assessors to represent fairly the selected visual properties of a proposed development. AVRs are produced by accurately combining images of the proposed building (typically created from a three dimensional computer model) with a representation of its context; this usually being a photograph, a video sequence, or an image created from a second computer model built from survey data. AVRs can be presented in a number of different ways, as either still or moving images, in a variety of digital or printed formats."

The London View Management Framework: Supplementary Planning Guidance (March 2012) Appendix C classifies AVRs into 4 categories according to their purpose from Levels 0 to 3:

AVR Level	Showing
0	Location and size of proposal
1	Location, size and degree of visibility of proposal
2	As level 1 + description of architectural form
3	As level 2 + use of materials

Examples of AVR Levels (images taken from The London View Management Framework: Supplementary Planning Guidance (March 2012) Appendix C):

AVR Level 0:

Showing Location and Size (in this case as a toned area superimposed on photograph)

AVR Level 1:

Confirming degree of visibility (in this case as an occluded 'wireline' image)

AVR Level 2:

Explaining architectural form (in this case as a simply shaded render in a uniform opaque material)

AVR Level 3:

Confirming the use of materials (in this case using a 'photorealistic' rendering technique)

The majority of photography based AVRs are either AVR 3 (commonly referred to as "fully rendered" or "photoreal") or AVR 1 (commonly referred to as "wireline").

The purpose of a wireline view is to accurately indicate the location and degree of visibility of the Proposed Development in the context of the existing condition and potentially in the context of other proposed schemes.

APPENDIX A AVR METHODOLGY

Site Visit and Viewpoint Locations

Each viewpoint is carefully chosen based on a combination of information, these include; zone of theoretical visibility (ZTV) analysis, strategic importance, open dialogue with local authority, and site walkover. Once the project team had agreed the exact locations, a photograph was taken which formed the basis of the study. The surveyor established the precise location of the camera.

Pegasus Planning Group carried out the site photography and survey on the 31st August 2018 and 22nd March 2021. The viewpoint locations were recorded using photography of the exact position of the camera and were GPS recorded using surveying equipment.

Photography

For each agreed viewpoint location, a high resolution photograph was taken with a 35mm (full frame) digital SLR camera, The camera is set up at a height of 1.6m to replicate an eye level view from the specified position. The location at which the photograph was taken was GPS recorded and photographed. The camera was levelled horizontally and vertically by means of a tripod mounted levelling base and two camera mounted spirit levels.

Lens Selection

In order to capture the full extent of the proposed development and an appropriate amount of contextual built form a 24mm lens (73.7° horizontal field of view), or a 50mm lens (39.6° horizontal field of view), were used.

Photography Equipment

- Canon 5D mkII digital SLR camera (35mm)
- Canon EF 24mm f/1.4 USM Lens
- Canon EF 50mm f/1.4 USM Lens
- Tripod indexed pan head
- Levelling base with spirit level

Field Survey Methodology

Alignment points are identified within each baseline image, usually points of contrast or standout permanent immovable features, distributed throughout the image within the x,y,z planes. Each point including the camera position is then surveyed and logged using the GPS unit based on the OSGB36 co-ordinate system giving Easting (x), Northing (y) and above Ordnance datum (AOD) height (z), for camera matching within the 3d computer environment. In any cases where no viable survey points are available two images are taken from the same camera position with control poles set out and surveyed in one of the images allowing the virtual camera to be orientated before the control image is replaced.

Survey Equipment

- Leica Zeno 20 + Disto S910: gamtec GPS Unit with HxGN SmartNet Real-Time Kinematic (RTK) Corrections to provide a tolerance of +/- 20mm.

Survey Data Post Processing

The camera locations and reference points were exported from the native GPS format into 3d dwg point cloud for cross-referencing within the 3d environment and baseline photography.

Photography Post Production

Where necessary standard image post production techniques were used, including curves, sharpening and levels. Should post production be required to a baseline viewpoint image the details of such are included in the Viewpoint Information table.
Any exceptions to the applied policies or deviations from the methodology are clearly described.

The Development Proposal

Pegasus Planning Group were provided with a 3d model of the proposal by the project architect.

The model was checked for accuracy against supplied 2d plans and elevation drawings and aligned to the OSGB36 co-ordinate system to correlate with the 3d survey data.

AVR Documentation

Each AVR image has an annotated border or 'graticule which indicates the field of view, the optical axis and the horizon line. This annotation helps the user to understand the characteristics of the lens used for the source photograph, whether the photographer applied tilt, vertical rise or horizontal shift during the taking of the shot and if the final image has been cropped on one or more sides.

The four red arrows mark the horizontal and vertical location of the 'optical axis'. The optical axis is a line passing through the eye point normal to the projection plane. In photography this line passes through the centre of the lens, assuming that the film plane has not been tilted relative to the lens mount. In computer rendering it is the viewing vector, i.e the line from the eye point to the target point.

If the point indicated by these marks lies above or below the centre of the image, this indicates either that vertical rise was used when taking the photograph or that the image has subsequently been cropped from the top or bottom edge. If it lies to the left or right of the centre of the image then cropping has been applied to one side or the other, or more unusually that horizontal shift was applied to the photograph.

The AVRs are annotated with the following information:

- Unique identification code (Viewpoint Reference Number)
- Textual description of viewpoint location and direction of view
- AVR Level
- Method
- Co-ordinates of camera position, height and tripod height
- Camera model and lens
- Focal length
- Image orientation
- Image horizontal field of view (HFOV)
- Time of day and date for any source photography
- Map and site photography showing location of camera position
- Peripheral annotation to the image to confirm the direction of view in the original photography (the optical axis)
- Definition of the field of view depicted each side of the optical axis, either in the form of peripheral annotation, textual description or more sophisticated maps

APPENDIX A AVR METHODOLGY

Photographic Alignment within the 3d Environment

The 3d model and point cloud data is combined into one 3d file, the whole model is then imported to 3ds Max, a 3d visualisation software.

A virtual camera was created within 3ds Max using the surveyed camera location, recorded target point and field of view (FOV) based on the camera and lens combination selected for the shot .

The annotated photograph was attached as a background to this view, to assist the Visualiser in aligning the surveyed point cloud to each corresponding background point, based on the Camera Matching Technique.

At this stage a 2nd member of the visualisation team cross-checked the camera alignment to verify the view was correctly set.

Using this virtual camera, a render was created of the aligned model at a resolution to match the baseline photograph. This was overlaid onto the baseline photograph to assess the accuracy of the alignment. When using a wide-angle lens, observations outside the circle of distortion are given less weighting.

Final Rendering and Post-Production

Depending on the level of AVR required the final render may take on various forms.

AVR Level 0 and 1 requires the proposals to be rendered in their simplest form as basic block models. The render is exported out from 3ds Max as a layered image file to the same resolution as the baseline photography. This image is then overlaid onto the baseline photography using Adobe Photoshop where a coloured wash is applied to the proposal for a level 0 AVR or in the case of a level 1 AVR lines are applied to the image to illustrate the visible and occluded maximum physical extent of the proposals. This process was performed on all views.

Level 1 AVRs use a single line display to indicate the profile of a scheme. Key edge lines are sometimes added to help understand the massing. The width of the profile line is selected to ensure that the diagram is clear, and is always drawn inside the true profile.

Level 2 and 3 AVRs require the proposals to be rendered with more architectural detail.

For level 2 AVR, a uniform opaque material is applied to the model. Context buildings that may influence shadows on the development proposal are constructed within the 3d environment and lighting is added to reflect the conditions at the time of photography. The image is rendered and exported from 3ds Max into Photoshop where it is overlaid onto the baseline photography and masking is applied to hide the non-visible aspects of the development in the view.

Masking is a technique to superimpose any elements within the view that will be in front of the development proposal thus provided the true visible extent of the development.

Level 3 AVRs are produced to represent the likely appearance of the proposed development using the proposed materials and textures which are applied to give the view a photo-realistic appearance. When a level 3 AVR is produced, context buildings and features are added to the model creating more realistic shadows cast by, and onto the development. Lighting conditions are set-up within 3ds Max to match the theoretical sunlight conditions at the time the source photograph was taken, and additional model lighting placed as required to best approximate the recorded lighting conditions and the representation of its proposed materials.

The final render is exported to the same resolution as the baseline photography. Multi pass renders are exported to give the visualiser more control in enhancements of the final image. These multi passes may included but not limited to Reflections, Refractions, Shadows, Lighting, Ambient Occlusion and Global Illumination.

The multi pass renders are layered within Adobe Photoshop and blended together to produce the correct level of detail and photo-realistic feel. Finally masking is applied to the image. Endless aesthetic effects can be applied to the rendered image to enhance the realism of the final image and/or make adjustments as a result of proposed material changes. However, the visualiser always attempts to be faithful to the proposed design within it's chosen site.

The final image is verified by a second visualiser to check the appearance, masking and form of the development.

The final images for all levels of AVRs are then saved in an appropriate format for inclusion within the AVR document.

Software Used

- AutoCAD
- 3ds Max 2022
- V-Ray 5 for 3ds Max
- Adobe Photoshop
- Adobe InDesign

APPENDIX B SOURCES OF AVR DATA

Supplied Data

Asset	File Type	Supplier	Reference	Date	Comments
3d Model	SketchUp	Hunters	M8764 Howson Terrace site model.skp	08.10.18	Model provided in Sketchup format. Converted into 3ds format.
Topographical Survey	dwg	Hunters	2926 R1.dwg	08.10.18	
Site Plan	dwg	Hunters	M8764_ASK003_Site_Plan_1-150@A0.dwg	08.10.18	
3d Model	SketchUp	Hunters	20201022 M8764 reduced massing.skp	19.07.21	Model provided in Sketchup format. Converted into 3ds format.

Generated Data by Pegasus Planning Group

Asset	File Type	Reference	Date	Comments
Survey Data	dwg	P17-2640_AVR-Survey-Points	31.08.18	
Viewpoint Locations	dwg	P17-2640_VPs	31.08.18	
Viewpoint Locations	dwg	P17-2640 Winter_VPs	22.03.21	

APPENDIX C TABLE OF SURVEY REFERENCE POINTS

Reference	Easting	Northing	Height (mAOD)
P001	518016.78	174223.66	11.28
P002	518016.06	174221.58	13.25
P003	518030.57	174260.41	19.66
P004	518033.05	174255.09	18.98
P005	518034.74	174248.05	19.60
P006	518034.80	174245.76	16.81
P007	518033.95	174243.28	16.12
P008	518019.06	174217.10	11.50
P009	518027.82	174227.45	13.20
P010	518031.96	174215.68	11.26
P011	518038.86	174219.37	14.14
P012	518039.63	174217.22	14.16
P013	518039.65	174217.25	15.51
P014	518039.62	174217.24	16.91
P015	518039.66	174217.28	18.17
P016	518039.69	174213.28	18.71
P017	518048.03	174214.74	18.60
P018	518070.79	174215.87	21.28
P019	518038.75	174208.30	15.63
P020	518038.65	174208.25	12.17
P021	518141.63	174286.14	34.98
P022	518141.48	174286.31	34.97
P023	518105.49	174270.17	30.34
P024	518103.72	174270.28	30.33
P025	518100.64	174269.49	30.31
P026	518100.54	174267.83	30.32
P027	518106.70	174271.18	28.05
P028	518141.10	174286.78	34.93
P029	518138.78	174285.65	35.26
P030	518138.49	174286.15	35.53
P031	518138.82	174287.04	35.25
P032	518140.47	174287.47	34.88
P033	518140.28	174287.70	34.86
P034	518140.09	174287.93	34.85
P035	518144.68	174290.06	35.54
P036	518143.54	174291.43	35.41
P037	518144.16	174199.05	20.59
P038	518130.21	174219.34	19.75
P039	518130.49	174219.81	19.75
P040	518149.28	174200.62	22.01
P041	518149.09	174200.55	23.01
P042	518148.93	174200.39	24.29
P043	518149.22	174200.58	24.15

Reference	Easting	Northing	Height (mAOD)
P044	518150.73	174201.72	25.88
P045	518153.84	174201.11	25.91
P046	518155.12	174199.22	24.33
P047	518153.01	174199.84	24.17
P048	518153.04	174199.85	23.08
P049	518149.74	174203.37	23.01
P050	518151.11	174200.17	23.03
P051	518151.07	174200.22	24.17
P052	518126.51	174190.84	21.71
P053	518293.42	173975.84	40.81
P054	518292.55	173977.46	40.82
P055	518291.72	173979.08	40.80
P056	518290.89	173980.73	40.77
P057	518290.33	173982.70	40.92
P058	518285.57	173994.44	40.39
P059	518285.50	173994.46	41.19
P060	518285.12	173995.28	41.21
P061	518284.77	173996.08	41.23
P062	518284.83	173996.04	40.39
P063	518285.20	173995.24	40.37
P064	518285.67	173992.53	40.84
P065	518286.41	173990.84	40.75
P066	518287.17	173989.17	40.69
P067	518287.88	173987.48	40.68
P068	518280.51	174006.54	41.43
P069	518279.10	174009.88	41.51
P070	518277.62	174015.21	41.65
P071	518268.90	174020.60	41.19
P072	518268.15	174022.16	41.21
P073	518267.27	174023.94	41.21
P074	518263.72	174025.82	41.85
P075	518266.45	174025.59	41.24
P076	518265.33	174029.12	41.28
P077	518264.67	174028.94	41.33
P078	518264.54	174030.76	41.29
P079	518263.69	174032.44	41.28
P080	518262.88	174034.07	41.28
P081	518258.05	174036.42	42.59
P082	518260.00	174052.49	41.63
P083	518253.91	174049.27	42.21
P084	517943.34	174219.16	2.36
P085	517881.63	174156.63	26.36
P086	517879.44	174151.32	28.70

Reference	Easting	Northing	Height (mAOD)
P087	517874.02	174153.62	26.44
P088	517869.12	174159.89	21.47
P089	517844.68	174223.71	26.45
P090	517941.35	174227.26	2.62
P091	517949.46	174212.05	3.35
P092	517942.92	174223.55	3.23
P093	517951.13	174209.43	3.51
P094	517952.45	174207.96	3.47
P095	517974.60	174204.72	5.40
P096	517975.05	174201.34	8.05
P097	518039.96	174202.46	29.01
P098	518039.94	174202.40	26.72
P099	518037.90	174177.24	25.25
P100	517982.06	174189.13	9.49
P101	517845.21	174445.29	9.81
P102	517843.69	174446.57	7.64
P103	517837.61	174443.58	7.54
P104	517837.17	174442.92	7.36
P105	517834.78	174441.21	7.37
P106	517833.94	174441.00	7.54
P107	517828.05	174447.79	6.66
P108	517825.75	174443.77	5.84
P109	517820.62	174457.86	6.75
P110	517815.39	174456.49	5.23
P111	517815.47	174461.98	6.84
P112	517812.01	174461.58	8.57
P113	517809.41	174464.94	4.69
P114	517806.19	174466.37	5.36
P115	517805.98	174471.80	5.39
P116	517830.25	174470.49	5.48
P117	517831.34	174469.15	5.47
P118	517842.88	174454.85	5.41
P119	518094.18	174285.95	39.07
P120	518094.75	174286.34	36.37
P121	518090.47	174291.31	38.7
P122	518036.94	174173.93	26.3
P123	518036.94	174173.93	23.6
P124	518048.09	174199.25	30.3
P125	518040.06	174205.53	30.3
P126	518035.09	174182.91	23.2
P127	518037.59	174249.64	24.6
P128	518062.56	174311.11	40.3
P129	518067.97	174314.86	40.3
P130	518081.22	174276.94	37.8
P131	518060.15	174307.22	37.8

Pegasus Group

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APPENDIX 1

LB RICHMOND PRE-APPLICATION RESPONSE (DATED 2ND NOVEMBER 2017)

LONDON BOROUGH OF
RICHMOND UPON THAMES

PLANNING

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Mr Giacomo Zanardo

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27 March 2017

Dear Mr Zanardo

Town and Country Planning Act 1990 (as amended)
Howson Terrace, Richmond Hill

Thank you for your pre-application submission for the redevelopment of Howson Terrace received on 13 January 2017, I apologise for the delay in this written response.

It is understood that the proposal involves the demolition of the existing buildings (comprising three, 2-storey blocks of 24 flats) and redevelopment to provide Category 1 retirement housing for those aged 65 and above within a building ranging from 3 to 6 storeys in height.

This pre application submission follows initial conversations with officers where a concern was raised with regard to size, height and mass. The principal issues relevant to your proposal have been summarised below and as set out in our meeting of 23 February 2017.

Policy context

At the Cabinet meeting of 13 December 2016 the Publication version of the Council's updated Local Plan was agreed for public consultation between 4 January and 15 February 2017 and it was also agreed that the policies would be adopted and used for development management purposes immediately. Therefore, the existing Core Strategy and Development Management Policies as well as the emerging Local Plan policies will need consideration.

As set out in the meeting, I do not intend to duplicate a large swathe of the text within local policies within this letter although I have set out below the policies I consider relevant (and may not be exhaustive) to the development sought and site constraints. These are set out on Richmond's website and should be self-explanatory in how they relate to this development.

The London Borough of Richmond upon Thames Core Strategy:
CP1, CP2, CP3, CP4, CP5, CP7, CP10, CP14, CP15.

The London Borough of Richmond upon Thames Local Plan:
DM SD1, DM SD2, DM SD4, DM SD5, DM SD7, DM OS2, DM OS4, DM OS5, DM OS6, DM OS11, DM HD1, DM HD3, DM HD4, DM HD7, DM HO5, DM HO6, DM TP2, , DM TP8, DM DC1, DM DC4, DM DC5, DM DC6.

The London Borough of Richmond upon Thames Publication Local Plan:

LP1, LP3, LP4, LP5, LP7, LP8, LP12, LP13, LP15, LP16, LP17, LP18, LP20, LP22, LP34, LP35, LP36, LP37, LP38, LP44, LP45.

Land Use

In principle the case for remodelling of sheltered housing by a Registered Provider can be supported, provided an application sets out full justification as set out in policies DMHO5 and LP37.

It is understood that Housing & Care 21 wish to redevelop the site, as it does not meet the current sheltered housing offer, and there are many concerns regarding the current scheme. Although it is understood to be generally fully let, the scheme would require significant repairs, maintenance and investment, to address issues such as damp, lack of inclusive access etc.

It is noted that the proposal is to redevelop the site and to retain sheltered/retirement housing, to re-provide the existing 24 x 1 bed flats for affordable rent, as a replacement of the existing flats, and additional accommodation to provide a total of 40 units, with the additional 16 units stated to be retirement housing for affordable shared ownership and outright sale.

Policy DMHO5 Housing to Meet Specific Community Needs states that the loss of existing housing will be resisted where it meets identified specific community needs, unless it can be shown that the accommodation is no longer needed, or that the existing accommodation will be adequately re-provided to an equivalent or greater standard in a different way or elsewhere, or the new accommodation will instead meet another identified priority local need. This approach is continued in Policy LP37.

Under Policy DMHO5 paragraph 5.1.34 in the Development Management Plan it recognised as a priority the remodelling of older peoples sheltered accommodation. Paragraph 9.4.9 in the Publication Local Plan also states current housing priorities include remodelling of older peoples sheltered accommodate to provide self-contained units. The Council priority is generally for conventional housing including affordable housing, reflecting the priority need set out in Local Plan evidence and the Council's housing strategies, in line with Policies CP15 and LP36.

The Council's Retirement Housing Review (October 2016)
http://www.richmond.gov.uk/retirement_housing_review.pdf aims to inform decision-making by the Council's housing, health and social care commissioning functions, as well to assist providers of retirement housing when reviewing existing stock or developing new schemes. It recognises the vast majority of the retirement housing units in the Borough are one bedroom and studio properties and suggests Registered Providers should consider continuing to remodel and modernise accommodation which is deemed to be unsuitable to ensure that the retirement housing available is high quality. It states providers should

minimise the loss of social rented units and disruption to existing residents and communities. It estimates that 145 additional units of retirement housing are required to address the current shortfall of supply and likely increase in demand, across 3 or 4 schemes in the borough and sets a timeframe of 2020 for the delivery of these units. These figures include remodelling existing units. It recommends a mix of market scale, intermediate sale and social rented units (76 should be sold at market rates, 35 units for intermediate sale and 34 social rented units). It states developers of retirement housing should engage with the Council to ensure that they bring forward retirement housing products which are viable and meet local needs in relation to housing and infrastructure.

In principle given the re-provision of existing units and the opportunities to improve the existing standard of accommodation for occupiers, aid the management of the units and improve inclusive access, can be detailed in an application to address Policy DMHO5.

Policies CP15 and LP36 expect at least 50% on-site provision of affordable housing on large sites, and seek an 80/20 split between rented and shared ownership. Rented units would need to comply with the Council's adopted Tenancy Strategy with regard to Affordable Rent and shared ownership units would need to comply with the affordability requirements of the Council's adopted Intermediate Housing Policy Statement and accompanying marketing guidance.

The Supporting Statement suggests the proposal is to replace existing social rent properties with affordable rent, however this would require further discussion about proposed rent levels; it is assumed that returning residents would be offered homes as social rent. It states to 'self-finance' the scheme, additional units will be for shared ownership and market sale. It will need to be justified that existing tenants can be accommodated, and there is a need to ensure affordability for new tenants. The proposal will provide at least 60% as affordable rented units; the number of affordable homes will increase subject to clarification of the proportion that will be for market sale.

It is recognised that it may be considered appropriate to include an element of market housing to enhance viability. Further discussions with the Council's housing development officers will be necessary in order to ascertain that the proposal has been satisfactorily explored with the Council - to influence the tenure mix, design and explore funding streams, to address policy requirements. Clarification about rent levels for the re-provided units to ensure affordability for returning residents and to comply with the Tenancy Strategy is required and the proposal should secure nomination rights to the rented units for the Council, subject to further clarification about the number of existing tenants who will occupy re-provided homes. This will also need to address a decant strategy. Overall the Council needs to be satisfied that the delivery of on-site affordable housing has been maximised to address policy requirements. It should be noted that full public disclosure of financial information should be expected to inform transparent decision-making. This evidence of discussions, in relation to funding and viability, are necessary to accompany an application to satisfy the requirements of the Local Validation Checklist.

Policy DMHO4 requires family housing outside of town centres. The mix should be informed by the proposed tenure. For sheltered accommodation/retirement accommodation it is recognised that a mix of 1 and 2 beds is appropriate to include opportunities for downsizing, which could accord with Policies DMHO5 and LP37.

The standards set out in Policies DMHO4, Policy LP 35 (B) and the Residential Development Standards SPD should be addressed. Since 1 October 2015 the Council has been applying the nationally described space standard. This sets a minimum gross internal floor area of 50sqm for a 1 bed 2 person one storey dwelling and 61sqm for a 2 bed 3 person one storey dwelling. The proposed unit sizes appear to meet these standards.

I note there are four flats proposed at lower ground floor. The Supplementary Planning Document: Residential Development Standards states 'Habitable rooms within basements should be preferably dual aspect to enhance cross ventilation and good daylight levels to otherwise compromised living conditions. Generally basements should be used for non-habitable or recreational areas rather than bedrooms or living rooms.' It states 'Single unit flats should not be located solely in full basements.' No elevations are provided and it is appreciated that there is a difference in levels across the site, so it may be that the description of lower ground floor is more accurate, rather than a fully fledged basement level.

The Council still seeks the provision of external amenity space in accordance with Policy DMHO4 and the Residential Development Standards SPD, and Policy LP 35 (C and D). The Supporting Statement states that the balconies, designed for active use, will provide for the one bed flats a minimum balcony area of 25sqm, increasing to a minimum of 30sqm for two bed flats. This would provide for a good level of amenity; however the proposed balconies would need to be assessed against the criteria set out in Policies DMDC6 and LP 8 (3) Amenity and Living Conditions.

Policy CP14 requires all new homes should be built to Lifetime Homes Standards and 10% to wheelchair standards. Since 1 October 2015 90% of new housing would be expected to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% would be expected to meet Building Regulation Requirement M4(3) 'wheelchair user dwellings'. This is set out in Policy LP35 (E). The Council's Retirement Housing Review (October 2016) states providers of retirement schemes should try to ensure that units are built to the optional higher Building Regulations as this would maximise accessibility and allow for these units to be more easily adapted to match residents' changing needs. This should be addressed in an application and it may be relevant to secure this by condition.

Design and impact on heritage assets

As set out in the meeting there are a number of constraints relating to this particular site. It is sited within the Richmond Hill Conservation Area and forms part of the Terrace House and Buccleugh Gardens, which is designated as Historic Park and Garden. It is also within an Archaeological Priority Zone.

Adjacent to the site (north east to south east) is designated Public Open Space, Metropolitan Open Land, Other site of Nature Importance, Thames Policy Area and within and adjacent to Protected View Lines.

With the site being within the Registered Park & Garden, it is noted that the existing buildings are at least very self- effacing, receding into and allowing the historic landscape to remain dominant.

The response to the aforementioned comments from officers is noted with the attempt to break up the massing through a range of heights and series of terraces along with the introduction of greenery within the balconies and to the roof.

In terms of the design, officers remain concerned with the proposed height and massing of the block which would be considerably higher than the existing buildings and occupying a larger footprint. While the balconies offer an opportunity to introduce greenery these also add an element of clutter to the façade drawing attention to the building in this sensitive location.

Interestingly, I am led to believe that the designation of the Historic Park and Garden was made after the current buildings were built. This is somewhat unusual and relevant as in some case similar designations deliberately skirt around built form to exclude it from the designation so there was good reason for its inclusion despite its limited architectural and historic merit. In this respect however there is a historic association and setting in the landscape, tucked in within the surrounding trees.

The concern in relation to height is that the proposal would punctuate the skyline and the tree line and could therefore be visually intrusive in its surroundings. The footprint of the building would result in a continuous block and could be read as being of substantial mass and whilst the introduction of glazed linkages could be successful this will depend on the execution and how this can be demonstrated to limit the appearance of the scale, bulk/mass.

A relatively modern approach to the design may be acceptable and it is recognised that such a design may facilitate a reduced mass as well as the ability to incorporate features such as the green roof. The green roof is welcomed as it would allow the building to assimilate with the surroundings that may not necessarily be readily achievable in a traditional approach to design.

In relation to views, there is a specific view which cuts through the site, from Richmond Hill towards Asgill House to the north west, providing views of the river and the listed structures of Richmond and Twickenham bridges. The site is also contained within wider views from Richmond Bridge looking east and on the periphery of the wider views from Richmond Hill looking south west and from the west side of the River Thames looking east/northeast towards Richmond Hill and across Petersham Meadows.

While there are no Buildings of Townscape Merit or listed buildings sited immediately adjacent to the site, it will be important to ensure that the setting of those buildings, positioned below and above the site on this prominent slope and their positive contribution in the wider conservation area is not prejudiced. Any increase in height and mass may affect such a setting were this deemed to be intrusive (in the foreground or background) and seen in the context of the prominent views set out above.

Any interruption in the skyline, above the tree line and obtrusiveness within the protected views will be resisted and particular attention to these views is required in a townscape and visual impact analysis which shall be submitted with an application.

The Thames Landscape Strategy http://thames-landscape-strategy.org.uk/wp-content/uploads/2015/01/9hham-2014.pdf doesn't specifically refer to this development or the buildings in the vicinity although it recognises the importance of the views and the landscape setting.

The conservation area statement states that the townscape is subservient to this landscape, trees and the topography of the hill where there may be development pressure which 'may harm the balance of the river and landscape-dominated setting, and the obstruction or spoiling of views, skylines and landmarks' and this is echoed in the conservation area study.

The Study recognises the 'substantial amount of duller inter-war and post-war flat development and that trees soften the junction between old and new'.

Clearly, the detail will be telling and views of the development from a variety of areas will be critical in demonstrating if the proposal will protect and preserve the setting of the wider environment and the designations in place.

Whilst the site is visually secluded, it is difficult to see how a proposed building of this scale could be acceptable in terms of impact on the Terrace Gardens Registered Park & Garden, and, although screened by trees, may also impact on the View from Richmond Hill. Your attention is drawn to the Local Plan Consultation Draft section 4.3.5. This guidance should be followed for a site of this sensitivity, the significance of heritage assets, how the proposals protect these and how particular attention has been paid to scale, design etc.

Transport implications

The application site is located within the Richmond Hill Community Parking Zone operating Monday to Saturday from 8.30am to 6.30pm. The council's transport planners note that residents of Howson Terrace have not had any residents permits issued historically or currently and thus request that any application coming forward should consider entering into a legal agreement removing access to resident/business/all zone parking permits and contracts in council run car parks for all units proposed.

They also that membership of car club should be secured through such a legal agreement for those units without provision of off street parking.

While off street parking is shown within the lower ground of the development, it is not clear how many parking spaces are proposed, how this space will be used for turning and what amount would be reserved for staff parking. Your attention is thus drawn to the maximum parking standards set out in the Local Plan. Any shortfall will require justification notwithstanding the extent of the CPZ hours as these would not preclude parking on surrounding roads in the evening when there may be more pressure for on street parking spaces.

An application will require demonstration on how refuse/recycling would be collected from the development.
It is noted that cycle parking would be provided in the lower ground level. Cycle parking using Sheffield style stands for this development will be required with separate storage for the flats and assisted care facility. Staff cycle parking will also be required to be provided in a secure, weatherproof and enclosed facility also separately from the two facilities mentioned previously.

Consideration should also be given to additional ground floor cycle parking for visitors and within an area benefitting from good surveillance and provision for electric buggy parking for residents.

A Construction Method Statement is required in draft given the 'one way' system of Richmond Hill and the narrow entrance/exit to the site.

On a minor point, the ramp gradient to the car park will be required and how the ramp be managed as it appears too narrow for two cars to pass each other. It is assumed a traffic light system may be employed and details of this and vehicle waiting space will be required.

Trees and woodland

The Council's arboriculture officer notes that an investigation concludes that the proposal is within a conservation area and that trees are visible throughout the site with a high concentration on the eastern and southern boundary.

In its current form there are concerns regarding the potential loss of trees within the site and the possibility of excessive shading to properties on the east of the site. Any application submitted shall clearly demonstrate that the development can coexist with the surrounding trees without the potential pressure to significantly lop or fell these where outlook (bearing in mind that the design seeks to maximise views of the River Thames and Richmond Park) and access to light for future occupants may be prejudiced.

It is recommended that a suitably qualified and experienced Arboriculturalist is commissioned to establish tree related constraints and therefore assist with the overall design and any future application includes the submission of an Arboricultural Report, including a Tree Protection Plan and Arboricultural Method Statement, which should be produced by a suitably qualified and experienced Arboriculturalist and be in accordance with British Standard 5837:2012 Trees in relation to design, demolition and construction - Recommendations.

Ecology/biodiversity

The Council's ecologist has no in principle objections, but states that it is essential the amount of green landscaping and as many of the existing trees remain so there is no disturbance to the buffer between Terrace Gardens and the urban setting river side of the river.

As part of any application, you are required to provide a Preliminary Ecological Appraisal with additional badger (badgers are in the area) and possibly bat surveys (bats are in the area including the possibility of roosts). It will be beneficial to include ecological enhancements (for invertebrates, bats, birds, badgers if applicable, with a potential for a green wall depending upon the difference between existing and proposed green open space) which includes a plan, specifications and maintenance.

In addition, the proposal should be accompanied by landscaping plans, specifications and maintenance and a lighting plan, including a lux contour plan and specifications.

Some concern has been expressed regarding light spill with mitigation required such as tinted glass facing Terrace Gardens to prevent additional such light spill onto the gardens and also allow continued commuting bat corridors for a 10 m corridor.

Neighbour amenity

The pre application submission has provided limited detail (aside from the site photographs) in relation to the surrounding development and no site visits/inspections are undertaken on such pre application submissions.

The relationship between the proposed development and the residential units to the west and north of the site requires careful consideration. Regard will be given to the existing relationship but with the proposed increase in height, scale and mass coupled with the elevated positon to the east with the inclusion of balconies, the development may give rise to an un-neighbourly development.

It would be prudent for an application to provide the relevant information to demonstrate that a proposal would not lead to unreasonable loss of light and outlook and will not appear overbearing, dominant and intrusive.

Sustainability

Your attention is drawn to the sustainability requirements set out in the Local Plan and the Supplementary Planning Document: Sustainable Construction Checklist. While it is acknowledged that the proposal would be likely to improve the carbon footprint and offer other sustainable improvements this has to be assessed against the loss of the existing buildings.

Any forthcoming applications will require the completion of the sustainable construction checklist and where applicable, provide a BREEAM pre assessment compliance check to demonstrate that an 'excellent' rating can be achieved. In addition, an energy statement and report shall be submitted demonstrating the carbon dioxide offset. From October 2016 zero carbon standards apply to all new major residential development (10 or more housing units) in line with London Plan policy 5.2. This means that at least 35% of regulated CO2 emission reductions (against a Building Regulations Part L (2013) baseline) must be achieved on-site, with the remaining emissions, up to 100%, to be offset through a contribution to the Council's Carbon Offset fund.

The price of carbon is £60/tonne over 30 years in line with the London Plan pricing.

Community Infrastructure Levy

Your attention is drawn to the CIL Regulations and while some elements of the proposal may be exempt from CIL this is required to be clearly set out in the submission.

Summary

While there is no objection in principle to the proposal, this is subject to demonstrating the level of redevelopment is justified in a number of areas. Subject to demonstration, it is understood that the existing buildings are reaching the end of their lifespan and beyond repair, refurbishment and extension that would be financially viable. Given the existing use and sensitivity surrounding this and the requirement to provide some enabling development, a careful balance is required in assessing the impact, particularly around the design and massing of the scheme.

Officers remain concerned that the overall bulk, height and scale would not be appropriate in this setting and such harm may not necessarily be outweighed by securing the long term future of the existing housing.

Without prejudice

Any advice given by Council officers for pre-application enquiries does not constitute a formal response or decision of the Council with regards to future planning consents. Any views or opinions expressed are given in good faith and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications.

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstances may change or come to light that could alter the position. It should be noted that if there has been

a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes.

(You are also advised to refer to local and national validation checklist on the Council's website)

Yours sincerely

pp Mr Robert Angus
Head of Development Management (Richmond)
Serving Richmond and Wandsworth Councils

APPENDIX 2

METHODOLOGY

1. TOWNSCAPE AND VISUAL IMPACT ASSESSMENT (TVIA) METHODOLOGY

1.1 This Townscape and Visual Impact Assessment (TVIA) has been undertaken with reference to best practice, as outlined in the following published guidance:

- *Guidelines for Landscape and Visual Impact Assessment* (3rd Edition, 2013) - Landscape Institute / Institute of Environmental Management and Assessment;
- GLVIA3 Statements of Clarification;
- *An Approach to Landscape Character Assessment* (2014) - Natural England;
- *An approach to landscape sensitivity assessment – to inform spatial planning and land management*, June 2019; and
- *Advice Note 4: Tall Buildings* (2015) Historic England.

1.2 The Landscape Institute adopted its new guidance on photography and visualisation: the *Visual Representation of Development Proposals*, Technical Guidance Note 06/19, 17 September 2019. Pegasus' TVIA will follow the new guidance with all viewpoints illustrated as the so-called Type 1 photographic evidence. A selection of viewpoints will be presented as Type 4 or 3 verifiable photomontage.

1.3 The Guidelines for Landscape and Visual Impact Assessment (GLVIA3) states in paragraph 2.7 that 'townscape' refers to areas where built form is dominant, and in particular that **"townscape means the landsca**pe within the built-up area, including the buildings, the relationship between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces**."**[1] In reading GLVIA3 in relation to townscape assessment, references to, and usage of the term 'landscape' are synonymous with the term 'townscape'.

1.4 GLVIA3 states within paragraph 1.1 that **"L**andscape and Visual Impact Assessment (LVIA) is a tool used to identify and assess the significance of and the effects of change resulting from development on both the **landscape as an environmental resource in its own right and on people's views and visual amenity."**[2]

1.5 GLVIA3 also states within paragraph 1.17 that when identifying townscape and visual effects there is a **"need for an approach that is in proportion to the** scale of the project that is being assessed and the nature of the likely

[1] Paragraph 2.7, Page 16, GLVIA, 3rd Edition
[2] Paragraph 1.1, Page 4, GLVIA, 3rd Edition

effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appr**opriate and proportional."**[3]

1.6 GLVIA3 recognises within paragraph 2.23 that **"professional judgement is a** very important part of LVIA. While there is some scope for quantitative measurement of some relatively objective matters much of the assessment must rely **on qualitative judgements"**[4] undertaken by a landscape consultant or a Chartered Member of the Landscape Institute (CMLI).

1.7 The effects on cultural heritage and ecology are not considered within this TVIA.

Effects Assessed

1.8 Townscape and visual effects are assessed through professional judgements on the sensitivity of townscape character, visual receptors and representative viewpoints combined with the predicted magnitude of change arising from the development.

1.9 Sensitivity is defined in GLVIA3 as **"a term applied to specific receptors,** combining judgments of susceptibility of the receptor to a specific type of **change or development proposed and the value related to that receptor."**[5] Various factors in relation to the value and susceptibility of townscape character, visual receptors or representative viewpoints are considered below and are cross referenced to determine the overall sensitivity as shown in Table 1:

Table 1, Overall sensitivity of townscape and visual receptors

	Value			
Susceptibility		High	Medium	Low
	High	High	High	Medium
	Medium	High	Medium	Medium
	Low	Medium	Medium	Low

1.10 Magnitude of change is defined in GLVIA3 as **"a term that combines judgements** about the size and scale of the effect, the extent over which it occurs,

[3] Paragraph 1.17, Page 9, GLVIA, 3rd Edition
[4] Para 2.23, Page 21, GLVIA, 3rd Edition
[5] Glossary, Page 158, GLVIA, 3rd Edition

whether it is reversible or irreversible and whether it is short or long term **in duration."**[6] Various factors contribute to the magnitude of change on townscape character, visual receptors and representative viewpoints.

1.11 The sensitivity of the townscape and visual receptor and the magnitude of change arising from the proposals are cross referenced in Table 8 to determine the overall degree of effects.

2. EFFECTS ON TOWNSCAPE ELEMENTS

2.1 Professional judgement has been used to determine the magnitude of change on individual landscape elements within the site as shown in Table 2:

Table 2, Criteria for assessing magnitude of change for landscape elements	
HIGH	Total loss/gain of a landscape element.
MEDIUM	Partial loss/gain or alteration to part of a landscape element.
LOW	Minor loss/gain or alteration to part of a landscape element.
NEGLIGIBLE	No loss/gain or very limited alteration to part of a landscape element.

3. EFFECTS ON TOWNSCAPE CHARACTER

3.1 Townscape character is defined as the **"distinct, recognisable and consistent** pattern of elements in the landscape that makes one landscape different **from another, rather than better or worse."**[7] The assessment of effects on townscape character considers how the introduction of new elements physically alters the landform, landcover, townscape pattern and perceptual attributes of the site or how visibility of the proposals changes the way in which the townscape character is perceived.

Sensitivity of Townscape Character

3.2 Sensitivity is determined by a combination of the value that is attached to a townscape element and the susceptibility of the townscape element to changes that

[6] Glossary, Page 158, GLVIA, 3rd Edition
[7] Glossary, Page 157, GLVIA, 3rd Edition

would arise as a result of the proposals – see pages 88-90 of GLVIA3. Both value and susceptibility are assessed on a scale of high, medium or low.

3.3 The criteria for assessing the value of townscape character is shown in Table 3:

Table 3, Criteria for assessing the value of townscape character	
High	Designated landscape/townscape including but not limited to World Heritage Sites considered to be an important component of the country's character experienced by a high number of people. Townscape condition is good and components are generally maintained to a high standard. In terms of seclusion, enclosure by land use, traffic and movement, light pollution and presence/absence of major infrastructure, the townscape has an elevated level of tranquillity. Rare or distinctive townscape elements and features are key components that contribute to the townscape character of the area.
Medium	Undesignated landscape/townscape including urban areas, open spaces and urban fringe considered to be a distinctive component of the national or local landscape/townscape character. Townscape condition is fair and components are generally well maintained. In terms of seclusion, enclosure by land use, traffic and movement, light pollution and presence/absence of major infrastructure, the landscape/townscape has a moderate level of tranquillity. Rare or distinctive landscape/townscape elements and features are notable components that contribute to the character of the area.
Low	Undesignated landscape/townscape including urban areas, open spaces and urban fringe considered to be of unremarkable character. Landscape/townscape condition may be poor and components poorly maintained or damaged. In terms of seclusion, enclosure by land use, traffic and movement, light pollution and presence/absence of major

	infrastructure, the landscape/townscape has limited levels of tranquillity. Rare or distinctive elements and features are not notable components that contribute to the landscape/townscape character of the area.

3.4 The criteria for assessing the susceptibility of townscape character is shown in Table 4:

Table 4, Criteria for assessing townscape susceptibility	
High	Scale of enclosure – townscapes with a low capacity to accommodate the type of development being proposed owing to the interactions of topography, vegetation cover, built form, etc. Nature of land use – townscapes with no or little existing reference or context to the type of development being proposed. Nature of existing elements – townscapes with components that are not easily replaced or substituted (e.g. ancient woodland, mature trees, historic parkland, etc). Nature of existing features – townscapes where detracting features, major infrastructure or industry is not present or where present has a limited influence on townscape character.
Medium	Scale of enclosure – townscapes with a medium capacity to accommodate the type of development being proposed owing to the interactions of topography, vegetation cover, built form, etc. Nature of land use – townscapes with some existing reference or context to the type of development being proposed. Nature of existing elements – townscapes with components that are easily replaced or substituted. Nature of existing features – townscapes where detracting features, major infrastructure or industry is present and has a noticeable influence on townscape character.
Low	Scale of enclosure – townscapes with a high capacity to accommodate the type of development being proposed owing to the interactions of topography, vegetation cover, built form, etc. Nature of land use – townscapes with extensive existing reference or context to the type of development being proposed.

	Nature of existing features – townscapes where detracting features or major infrastructure is present and has a dominating influence on the townscape.

3.5 Various factors in relation to the value and susceptibility of townscape character are assessed and cross referenced to determine the overall sensitivity as shown in Table 1.

Magnitude of Change on Townscape Character

3.6 Professional judgement has been used to determine the magnitude of change on townscape character as shown in Table 5:

Table 5, Criteria for assessing magnitude of change on townscape character	
High	Introduction of major new elements into the townscape or some major change to the scale, landform, landcover or pattern of the townscape.
Medium	Introduction of some notable new elements into the townscape or some notable change to the scale, landform, landcover or pattern of the townscape.
Low	Introduction of minor new elements into the townscape or some minor change to the scale, landform, landcover or pattern of the townscape.
Negligible	No notable or appreciable introduction of new elements into the townscape or change to the scale, landform, landcover or pattern of the townscape.

4. EFFECTS ON VISUAL AMENITY

4.1 The effects on visual amenity considers the changes in views arising from the proposals in relation to visual receptors including settlements, residential properties, transport routes, recreational facilities and attractions; and representative viewpoints or specific locations within the study area.

Sensitivity of Visual Receptors

4.2 Sensitivity is determined by a combination of the value that is attached to a view and the susceptibility of the visual receptor to changes in that view that would arise

as a result of the proposals – see pages 113-114 of GLVIA3. Both value and susceptibility are assessed on a scale of high, medium or low.

4.3 The criteria for assessing the value of views is shown in Table 6:

Table 6, Criteria for assessing the value of views	
High	Views with high scenic value within designated landscapes/townscapes including but not limited to World Heritage Sites, National Parks, Areas of Outstanding Natural Beauty, etc. Likely to include key viewpoints on OS maps or reference within guidebooks, provision of facilities, presence of interpretation boards, etc.
Medium	Views with moderate scenic value within undesignated landscape/townscape including urban fringe and rural countryside.
Low	Views with unremarkable scenic value within undesignated landscape/townscape with partly degraded visual quality and detractors.

4.4 The criteria for assessing the susceptibility of views is shown in Table 7:

Table 7, Criteria for assessing visual susceptibility	
High	Includes occupiers of residential properties and people engaged in recreational activities in the countryside using public rights of way (PROW).
Medium	Includes people engaged in outdoor sporting activities and people travelling through the townscape on minor roads and trains.
Low	Includes people at places of work e.g. industrial and commercial premises and people travelling through the townscape on major roads and motorways.

Magnitude of Change on Visual Receptors

4.5 Professional judgement has been used to determine the magnitude change on visual receptors as shown in Table 8:

Table 8, Criteria for assessing magnitude of change for visual receptors	
High	Major change in the view that has a defining influence on the overall view with many visual receptors affected.
Medium	Some change in the view that is clearly visible and forms an important but not defining element in the view.
Low	Some change in the view that is appreciable with few visual receptors affected.
Negligible	No notable change in the view.

5. DEGREE OF TOWNSCAPE AND VISUAL EFFECTS

5.1 The degree of effects are professional judgements based upon all the factors in terms of townscape and visual sensitivity and the magnitude of change arising from the proposals. The cross referencing of townscape and visual sensitivity and the magnitude of change determines the overall degree of effects as shown in Table 9:

Table 9, Degree of townscape and visual effects

		Sensitivity			
		High	Medium	Low	Negligible
Magnitude of Change	High	Major	Major	Moderate	Negligible
	Medium	Major	Moderate	Minor	Negligible
	Low	Moderate	Minor	Minor	Negligible
	Negligible	Negligible	Negligible	Negligible	Negligible

6. NATURE OF EFFECTS

6.1 GLVIA3 includes an entry that states **"effects can be described as positive or** negative (or in some cases neutral) in their consequences for views and **visual amenity."**[8] GLVIA3 does not, however, state how negative or positive effects should be assessed and therefore becomes a matter of subjective judgement rather than reasoned criteria. Due to inconsistencies with the assessment of negative or positive effects a precautionary approach is applied to this TVIA that assumes all townscape and visual effects are considered to be negative or adverse unless otherwise stated.

[8] Para 6.29, Page 113, GLVIA, 3rd Edition

APPENDIX 3

ELEVATION DRAWINGS BY HUNTERS

WEST ELEVATION
scale 1:100@A0

SITE LOCATION PLAN
scale 1:1250@A0

KEY TO DRAWING:

1. **Facing brick:** Yellow multi-stock (tbc), natural mortar, bucket handle pointing
2. **Facing brick:** Blue engineering brick (tbc), natural mortar, bucket handle pointing
3. **Aluminium cladding:** 3-4mm thick solid aluminium cladding on helping-hand system RAL 7016
4. **Balustrades:** Formed of 12mm steel flats at 100mm centres RAL 7016
5. **Windows:** Aluminium / timber composite windows RAL 7016
6. **Brick feature:** Engineering brick soldier course window head feature
7. **Brick feature:** Header course bolt on soffit feature
8. **Brick feature:** Header course cant brick cill
9. **Green wall:** Climbing plants on wires
10. **Green roof:** Extensive bio-diverse / green roof
11. **Lift over-run:** Exact height TBC subject to manufacturer

GENERAL NOTES:

For clarity some of the trees have been omitted from the elevations.

NB no existing trees will be removed underr the proposals. For full details of the trees on site please refer to the Tree Constraints Plan, Tree Survey Schedule and the GAs

0 1m 5m 10m 20m

Revision:

N

project name: HOWSON TERRACE, RICHMOND
drawing reference: PROPOSED ELEVATIONS
West elevation
job number: M8764
drawing number: APL 010
revision:
status: PLANNING
cad ref: M8764 - Howson current file.dwg
date: 18 09 2020
sheet:
drawn: pds
scale: 1:100@A0
checked: MB

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EAST ELEVATION
scale 1:100@A0

SITE LOCATION PLAN
scale 1:1250@A0

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0 1m 5m 10m 20m

Revision

project name: HOWSON TERRACE, RICHMOND
drawing reference: PROPOSED ELEVATIONS
East elevation
job number: M8764
drawing number: APL 011
revision:
status: PLANNING
cad ref: M8764 - Howson current file.dwg
date: 18 09 2020
sheet:
drawn: pds
scale: 1:100@A0
checked: MB

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