



GREGGS

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4. Appraisal of Effects of the Scheme Proposal

Introduction

4.1 This section considers how the Scheme Proposal, described below and illustrated in the accompanying planning application documents, will affect the receptors identified in the baseline study. The second part of this section describes the anticipated effects relating to the Site and the townscape character. The third part describes the effects on the visual receptors and the supporting representative views.

4.2 To assist in defining the effects, the sensitivity of the townscape character and visual receptors representative views are considered. As outlined in the methodology, sensitivity is determined by combining assessments of value (set out in **Appendix B**), and an appraisal of the susceptibility of the receptors to the Scheme Proposal.

4.3 For each receptor, the magnitude of change resulting from the Scheme Proposal is then described. The magnitude of change, upon completion of the Scheme Proposal, considers the effects in terms of duration, reversibility, geographical extent and size or scale. The Scheme Proposal is considered to be long term and permanent and therefore to avoid unnecessary duplication, duration and reversibility are not discussed further.

Description of Scheme Proposal

4.4 The Scheme Proposal seeks full planning permission for the demolition of existing industrial buildings across the Site with the retention of an existing two storey end of terrace dwelling house on Gould Road and the redevelopment of the Greggs Bakery Site through the provision of a variety of buildings ranging from 2 – 5 storeys, comprising delivery of mews housing, four apartment buildings to the north of the Site fronting the River Crane and the delivery of a commercial building fronting Edwin Road. The development will include 116 new homes and 175sqm of commercial floorspace (Use Class E). It is set within an area of new public realm that opens up access to the south side of the River Crane.

4.5 The supporting Design and Access Statement, prepared by Assael, illustrates how the Scheme Proposal has been carefully considered and designed in responses to the Site's opportunities and constraints and its context. Throughout the process of developing the design (prior to the submission in 2019), consultation was undertaken with local stakeholders and LBRuT Officers and the scheme was

subject to a formal Design Review. The previously submitted scheme received positive feedback in respect of design and massing and were supported, in this regard, within the Officers report. Design matters did not contribute to the reasons for refusal of the 2019 application.

4.6 The Scheme Proposal has been informed by the following design principles, which are set out in full within section 3.4 of the Design and Access Statement:

- Remove all existing buildings with exception of the end terrace house on Gould Road;
- Introduce new access route through the Site retaining the existing entrances;
- Respond to the context in regard to massing, placing taller buildings to the north of the Site;
- Refer to local architectural styles, roofs and character to respond to the local context; and
- Optimise landscaping to the riverside, garden and new street.

4.7 The Scheme Proposal comprises both houses and three apartment blocks, which range in height. Office space is provided at the Edwin Road entrance, to the south. The Scheme proposal can be divided in three character areas (as shown in **Figure 4.1**):

- The Entrance;
- The Mews; and
- The Riverside.

4.8 The Entrance provides a gateway into the Scheme Proposal from Edwin Road to the south. It includes a standalone office building, which provides a front gable elevation onto the road, and the flank gable elevation of one of four residential houses that addresses the new mews street. All of the properties are two storey in height and follow the building line established along Edwin Road. The gable elevations and façade material match the surrounding context. Further information on the architectural approach and façade material can be found within section 4.10.2 and 4.10.2 of the Design and Access Statement.

4.9 Along the Mews, to respond to the existing situation along the adjacent Norcutt Road and Crane Road, the houses are two and a half stories in height. The houses present an architectural unity with similar geometry and mansard roofs. They are given individual character through a variety of proposed façade materials, window type and architectural detailing that has been derived from analysing the surrounding context.

4.10 On the east side of the Mews, the houses are bordered with a front garden, a driveway and an integrated bin and bike store. Whilst on the west side, the houses are provided with an integrated garage. Further information can be found within section 4.10.3 to 4.10.6 of the Design and Access Statement.

4.11 On the Riverside, the apartment blocks present an industrial aesthetic and comprise a range of building heights, ranging between three to five stories, roofs and geometries. This break up their massing and helps creates visual interest. The blocks are set back from the River Crane and railway line to provide room for a new landscaped courtyard and a natural play area. Further information can be found within section 4.11.1 and 4.11.2 of the Design and Access Statement. Four, two storey, terraces houses are also present within this area and described in section 4.11.3.



Figure 4.1 - Scheme Proposal Character Areas

4.12 During the construction phase all contractors will be required to apply good practice measures site measures as part of a Construction Management Programme. It can be assumed that the programme will include standard construction methods and housekeeping will be maintained to keep a tidy site and reduce visual clutter during construction works.

Effects on Townscape Character

4.13 The following section considers the effects of the Scheme Proposal on townscape character at the local level. Definitions and criteria used are found in **Appendix B**.

4.14 There will be temporary, localised effects during the construction phase caused by additional larger vehicles, deliveries, cranes and plant etc. These effects are considered to be negative, however they will be short-lived and temporary in nature and are not considered further.

4.15 At a national level the townscape character has been considered in line with the NPPF and the Scheme Proposal is *“sympathetic to local character and history, including the surrounding built environment and landscape setting”*, as set out in paragraph 130. Whilst at a local level the Scheme Proposal responds *“to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character”* in accordance with ‘Policy D.3 Optimising site capacity through the design-led approach’ of the London Plan.

4.16 The Scheme Proposal also considers *“the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing”*, as discussed in LBRuT’s Local Plan Policy LP1-Local Character and Design Quality. It has also been designed to address LP2-Building Heights with the Scheme Proposal generally reflecting the existing and emerging prevailing building heights within the study area.

4.17 The Site falls within ‘TCA3 Twickenham West’. This has been recognised as having a high to medium value within the baseline section of this appraisal. The Scheme Proposal is of a scale and mass that will not detract from the surrounding context and will help to reactivate the street frontage to Edwin Road and provide a new area of public realm to the River Crane.

4.18 It is considered that ‘TCA3 Twickenham West’ can accommodate the Scheme Proposal and has a medium susceptibility to the change proposed, as defined in the methodology set out in **Appendix B**. Through assessing the ‘value’ and ‘susceptibility to change’ it is concluded that ‘TCA3 Twickenham West’ has a high to medium sensitivity to the Scheme Proposal.

4.19 Overall it is considered that the Scheme Proposal improves the townscape situation of ‘TCA3 Twickenham West’, as shown in representative views 2, 3, 4 and 7 of **Appendix C**. The Scheme Proposal has a direct, permanent, medium magnitude of change and overall **moderate** and **beneficial effect**.

4.20 The Scheme Proposal indirectly affects the areas of ‘TCA4 Heatham Estate’ which are close to the Site (representative view 6) and from which partial to no views are possible. Overall, the Scheme Proposal has an indirect, permanent, low magnitude of change and overall **minor** and **neutral effect** on TCA4.

4.21 The Scheme Proposal will also result in an indirect negligible to none magnitude of change and overall minor to **negligible** and **neutral effect** on ‘TCA1 Crane Park’ (representative view 2) and ‘TCA2 Twickenham Green’ (representative view 1) and their value, susceptibility to change and sensitivity are summarised in **Table 4.1**.

4.22 The Scheme Proposal enhances the townscape character and visual appearance of this area of Twickenham. The Scheme Proposal provides a well-designed development which relates positively to the existing building line of Edwin Road and respects the receiving context.

Table 4.1 – Townscape Character Area Appraisal of Effects

Townscape Character Area	Value	Susceptibility to change	Sensitivity	Magnitude of change	Effect
TCA1 Crane Park	High to medium	High to medium	High to medium	Negligible to none	Minor to negligible neutral
TCA2 Twickenham Green	High	High	High	Negligible to none	Minor to negligible neutral
TCA3 Twickenham West	High to medium	Medium	High to medium	Medium	Moderate beneficial
TCA4 Heatham Estate	Medium to low	Low	Low	Low	Minor neutral

Effects on Visual Receptors

4.23 With the implementation of the Scheme Proposal, it is considered that the Site's ZTV will increase slightly, with the views from the visual receptors identified previously within the baseline section remaining broadly the same, but new views possible to the roof in the medium distance from the north of the study area.

4.24 There will be temporary, localised changes in the view from some visual receptors during the construction phase, typically associated with the temporary enclosure of the Site with hoarding and views of construction plant. These effects are considered to be negative, however they will be short-lived and temporary in nature and are not considered further.

4.25 In order to identify and assess the likely effects of the completed Scheme Proposal on the identified views and visual receptors, rendered Accurate Visual Representations (AVR) have been prepared. AVRs are defined as images that illustrate the location, scale, degree of visibility, visual description of architectural form and use of materials.

4.26 The AVRs and a description of the likely effects of the Scheme Proposal within all seven representative viewpoints are provided at **Appendix C** and in **Table 4.2** which provides a summary of the findings relating to the value of the views, the sensitivity of the receptors and the magnitude of change resulting from the Scheme Proposal.

4.27 The following provides a summary of the visibility of the completed Scheme Proposal for the key visual receptors / receptor groups:

- Overall it is considered that the Scheme Proposal will not be visible from the majority of publicly accessible areas within the conservation areas that surround the Site. The effect of built form and intervening vegetation typically prevent a view to the Scheme Proposal from Twickenham Green, as demonstrated in representative view 1.
- It is considered that the Scheme Proposal will have a negligible impact on the two local panoramic views of the Vale of Thames identified within the LBRuT's Local Plan Proposals Map in the winter, due to the intervening built form and vegetation.
- It is considered that the Scheme Proposal will be visible from the Footpath adjacent to the Depot's southern boundary and from Craneford Way recreation ground (representative view 6), but not from Kneller Garden due to intervening vegetation, as demonstrated in representative view 5.
- Where the windows are orientated towards the Site, it is considered that partial to glimpsed views will be possible to the Scheme Proposal from the upper stories of the low to mid rise residential properties and taller residential apartment block located within 500 metres of the Site. The view will be reduced the further positioned away from the Site.
- Representative views 2, 3 and 4 demonstrate that the Scheme Proposal will be visible from the public highway where roads are orientated towards the Site. Representative view 7 illustrates it will also be visible from elevated footpath within 300 metres of the Site and it is considered a similar view will be afforded by the raised southern arm railway line.

Table 4.2 – Representative Views Appraisal of Effects

No.	Representative View	Value	Susceptibility to change	Sensitivity	Magnitude of change	Effect
1	Twickenham Green	High to medium	High	High	None	None
2	Warwick Road (south)	Medium to low	Medium	Medium	Medium to low	Moderate to minor / Beneficial
3	Edwin Road (west)	Medium to low	Medium	Medium	Low	Minor / Beneficial
4	May Road (north)	Medium to low	Medium	Medium	Medium to low	Moderate to minor / Beneficial
5	Kneller Gardens	Medium	High	High	Negligible to no	Negligible / Neutral
6	Craneford Way Recreational Ground	Medium to low	Low	Medium to low	Medium to low	Moderate to minor / Beneficial
7	Footbridge crossing the railway	Low	Medium	Medium to low	Low	Minor / Beneficial



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5 Summary and Conclusions

Introduction

5.1 The TVIA has been founded on a thorough study of the Site and its townscape setting, and through understanding these features and resources, a robust impact appraisal of the Scheme Proposal has been undertaken.

5.2 The Site consists of a broadly 'L' shape block that is bounded by two residential streets, the River Crane, and railway line to the north and Edwin Road to the south. It contains several one to three storeys warehouses, associated areas of hard standing carparks and loading areas.

5.3 The Scheme Proposal seeks full planning permission for fifty one houses and three apartment blocks which range in height from two to five stories. It references local architectural detailing, styles and character along with providing a contextual façade material palette and detailing. The heights of the Scheme Proposal responds to the existing and emerging prevailing building heights within the study area. Access is provided to the southern side of the River Crane.

5.4 This TVIA repeats the assessment undertaken for the planning application submitted in 2019 (ref 19/0646) and whilst the baseline remains unchanged, the report has been updated to reflect current planning policy and includes an update to the wirelines of the proposed development Lockcorp House within the verified views previously assessed.

Townscape Character Areas Appraisal

5.5 The townscape character appraisal considers the townscape elements that contribute to the study area, such as landform, land use, movement, built form and appearance, along with designated heritage assets. The Site itself sits within 'TCA3 Twickenham West'; due to its appearance it does little to contribute to the townscape of this area.

5.6 The Scheme Proposal enhances the townscape character and visual appearance of the local area. It also positively responds to the streets perpendicular to Edwin Road. Overall it is considered that the Scheme Proposal will have a **moderate beneficial effect** on 'TCA3 Twickenham West', as set out in **Table 4.1**. This is due to it improving the townscape situation.

5.7 Partial to no views are possible to the Scheme Proposal from 'TCA4 Heatham Estate'. The Scheme Proposal has an indirect **minor and neutral effect** on this area. The Scheme Proposal will also have an indirect **minor to negligible and neutral effect** on 'TCA1 Crane Park' and 'TCA2 Twickenham Green'.

5.8 The appraisal establishes that the Scheme Proposal will replicate the local context and historic character in terms of continuing to reflect the urban grain and building line present within the area. As a reminder of the Site's history, it also provides industrial and contemporary features, especially in term of geometry and roofs for the apartment blocks. It is considered that this is in accordance with the NPPF, PPG and local policies.

Visual Appraisal

5.9 Existing views to the Site are largely restricted to local views from the immediate townscape of Edwin Road, Crane Road and Gould Road and the surrounding residential and light industrial properties. These views become glimpsed when travelling away from the Site along Edwin Road and Gould Road. The footbridge above the railway line to the north east of the study area provides a fleeting view and a limited glimpsed view can be gained to the Site's silos and northern warehouses.

5.10 With the implementation of the Scheme Proposal it is considered that views from visual receptors will increase in the medium distance to the roofs of the apartment blocks. Importantly these features will not interact or compete with local landmarks, such as Athelsan Place.

5.11 Overall, it is considered that the Scheme Proposal will lead to the following residual, direct, permanent, magnitude of effects on the representative views:

- **Moderate to minor and beneficial effect - representative views 2, 4 and 6**
- **Minor and beneficial effect - representative views 3 and 7**
- **Negligible and neutral - representative view 5**
- **No effect - representative view 1**

5.12 The Scheme Proposal will make a positive contribution to the townscape and enhance the visual appearance of the local area in accordance with the NPPF, NPPG and local policies.

APPENDIX A

Planning Policy Review

Planning Policy

National Policy and Guidance

A.1 At a national level the National Planning Policy Framework (NPPF), with the current version of the NPPF being published in July 2021. The NPPF sets out the Government's planning policies for England. The NPPF is supported by Planning Practice Guidance which is reviewed and updated on an on-going basis.

A.2 The NPPF seeks to provide a planning framework within which the "locally-prepared plans for housing and other development can be produced". Paragraph 7 states that "The purpose of the planning system is to contribute to the achievement of sustainable development" and that the planning system has three "overarching objectives which are interdependent" These are listed as economic, social and environmental; with the latter two being of specific relevance to this appraisal which are quoted below.

"•a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

•an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy".

A.3 Paragraph 10 (and defined in paragraph 11) states "So that sustainable development is pursued in a positive way, at the heart of the Frameworks is a presumption in favour of sustainable development"

A.4 The NPPF sets out national policy addressing a broad range of issues, and whilst the NPPF should be taken as a whole, chapter 12- Achieving well-deigned places, is of specific relevance to this study.

A.5 Paragraph 126 states that "The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable

development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this".

A.6 Paragraphs 128 and 129 introduce the need for councils to provide clarity about design expectations early on and introduce the (new) requirement for councils to prepare "design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes. These provide a local framework for creating beautiful and distinctive places, with a consistent and high quality standard of design"

A.7 Paragraph 130 sets out 6 elements that: "Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

A.8 Paragraph 130 goes on to state 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, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development"

A.9 The NPPF promotes early discussions between applicants, the local planning authority and local community in Paragraph 128. Whilst Paragraph 130 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" Equally it states that "where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development."

National Planning Practice Guidance

A.10 National Planning Practice Guidance (PPG) was first published in 2014 is updated by the Government on an ongoing basis. It is a web-based resource intended to provide more detailed guidance and information regarding the implementation of national policy set out in the NPPF.

A.11 Guidance is provided on Design: process and tools, which supports the need to evaluate and understand the defining characteristics of an area in order to identify appropriate design opportunities and policies.

Local Policy, Guidance and Appraisals

Current Planning Policy

A.12 The development plan for the London Borough of Richmond upon Thames (LBRuT) comprises the London Plan: Spatial Development Strategy for London (2016) and LBRuT Local Plan (2018). The latter provides a concise, all-in-one plan setting out the vision, strategic objectives and policies for development in the borough over 15 years.

The London Plan 2021

A.13 The current version of the London Plan was formally published in March 2021. Whilst many of the policies apply to the proposed development, the following are of specific relevance to this study.

A.14 Chapter 3 addresses Design with Policy D1 making specific reference to character and views stating in Part A that "Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth". The supporting text goes on to state at para 3.1.2: "Understanding the existing character and context of individual areas is essential in determining how different places may best develop in the future. An evaluation of the current characteristics of a place, how its past social, cultural, physical and environmental influences have shaped it and what the potential opportunities are for it to change will help inform an understanding of an area's capacity for growth and is crucial for ensuring that growth and development is inclusive."

A.15 London Plan Policy 7.5 – 'Public Realm', states that development should aim to make the public realm "comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way".

A.16 Policy D4, Delivering Good Design refers to testing and analysing design and development capacity, including through the use of visual modelling. The policy requires applicants undergo Design Review processes and that design quality should be maintained through approval of details and the avoidance of design matters being deferred to planning conditions stages. *“Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.”*

A.17 Policy D9 Tall Buildings states that local context should define what is considered a tall building, noting that this will vary in different parts of London but are considered to be buildings no lower than 6 stories or 18m tall. Whilst the proposed development does not fall within the definition of a tall development, the policy does include some relevant considerations that are applied within the TVIA and therefore extracts of the policy are included below for context only.

A.18 At section C of the policy it states the following:

Development proposals should address the following impacts:

1) visual impacts

a) the views of buildings from different distances:

i long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views

ii mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality

iii immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be

an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding

c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan d) proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area

e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it

f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river

g) buildings should not cause adverse reflected glare h) buildings should be designed to minimise light pollution from internal and external lighting

A.19 Item 4 of D9, in reference to Cumulative Impacts, states: *“the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting”.*

A.20 Chapter 7 of the London Plan addresses Heritage and Culture with Policy HC4 focussing on the London View Management Framework. This designates strategically important views which are identified on Figure 7.5 of the London Plan. The Application Site does not fall within Designated Strategic Views.

Richmond’s Local Plan

A.21 Adopted in July 2018, LBRuT’s Local Plan sets out planning policies for the borough to guide growth in housing and jobs, infrastructure delivery, place-shaping and the quality of the built environment up to 2033. It replaces the LBRuT’s Core Strategy (2009) and remaining saved policies in the Development Management Plan (2011).

A.22 One of the 6 strategic objectives for LBRuT’s Local Plan regarding the protection of the local character is *“Protect and, where possible, enhance the environment including the heritage assets, retain and improve the character and appearance of established residential areas, and ensure new development and public spaces are of high quality design”.*

A.23 LBRuT’s Local Plan Policy LP1-Local Character and Design Quality establishes criteria that development should address:

“1. Compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;

2. Sustainable design and construction, including adaptability, subject to aesthetic considerations;

3. Layout, siting and access, including making best use of land;

4. Space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;

5. Inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and

6. Suitability and compatibility of uses, taking account of any potential adverse impacts of the collocation of uses through the layout, design and management of the site.”

A.24 The policy’s supporting text states that *“This policy requires developers and applicants to take a sensitive approach to the architectural design of new buildings, [...], as well as landscape proposals. The Council does not wish to encourage a particular architectural style or approach but expects each scheme to be to a high quality [...]. Schemes should be based on a sound understanding of the site and its context, following the locally specific guidance set out in the Village Planning Guidance SPDs.”*

A.25 LBRuT’s Local Plan Policy LP2-Building Heights establishes criteria that development should address, this includes:

“1. Require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area;

2. Preserve and enhance the borough’s heritage assets, their significance and their setting;

3. Respect the local context, and where possible enhance the character of an area, through appropriate:

- a. Scale*
- b. Height*
- c. Mass*
- d. Urban pattern*
- e. Development grain*
- f. Materials*
- g. Streetscape*
- h. Roofscape and*
- i. Wider townscape and landscape”*

A.26 LBRuT’s Local Plan Policy LP3-Designated Heritage Assets states that:

“The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough.

Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal.”

A.27 LBRuT’s Local Plan Policy LP4-Non-Designated Heritage Assets states that:

“The Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, and other local historic features.”

A.28 LBRuT’s Local Plan Policy LP5-Views and Vistas states that:

“The Council will protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means:

1. Protect the quality of the views and vistas as identified on the Policies Map, and demonstrate such through computer-generated imagery (CGI) and visual impact assessments;

2. Resist development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline;

3. Require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced;

4. Require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background;

5. Seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured;

6. Seek improvements to views within Conservation Areas, which:

a. Are identified in Conservation Area Statements and Studies and Village Plans;

b. Are within, into, and out of Conservation Areas;

c. Are affected by development on sites within the

setting of, or adjacent to, Conservation Areas and listed buildings

A.29 A.21. LBRuT’s Local Plan – Proposals Map (2015) provides useful context on the location, direction, type and content of the local views.

Other Guidance and Townscape Initiatives

A.30 The LBRuT has been divided into village areas. Village Planning Guidance SPDs have been prepared for the village areas to provide supplementary guidance and identify key feature and characteristics valued by local communities. The Site falls within the LBRuT Twickenham Village Planning Guidance SPD (2018), which establishes the character of the various components of this area of the borough and is located within ‘Character Area 11: North of the Green’, described as:

“Properties in the character area tend to front directly onto the pavement or step slightly back from the street with small front gardens behind low brick walls or fencing. Roads are narrow and intimate, and cars are parked on the street.”

A.31 It goes onto to state that

“The area is also distinctive for its light industry, which is tucked amongst the predominantly residential area between Twickenham Green and the River Crane. These industrial pockets can be found along Mereway Road, Colne Road and to the north of Edwin Road and are characterised by single storey warehouse units and outdoor space for parking.”

A.32 The overall dominant features and materials described within the Twickenham Village Planning Guidance SPD are terraced residential buildings with red brick surrounds, small front gardens, prominent chimneys, sash windows, slate roofs and render.

A.33 The Site is also mentioned in the part 8 of the SPD as an identified site for development. It states that the development proposal will have to consider:

- The residential scale and character of the surrounding area to inform the siting / scale / massing of new development.
- Opportunities to provide high quality landscaping and, where appropriate, open space.

- Establishing a positive relationship with the River Crane along the northern edge of the site, enabling new linkages to and along the river route.
- Impact on views across the Crane Valley.
- Appropriate levels of parking to avoid placing pressure on the surrounding streets.
- Relationship with the Edwin Road frontage to secure improvements to the street scene.

A.34 LBRuT prepared Conservation Area Statements for all the three Conservation area that fall within the study area: Twickenham Green Conservation Area, Hamilton Road Conservation Area, Rosecroft Gardens Conservation Area. They provide details for local views.

A.35

1.36 The National Design Guide was published in October 2019 and has been produced to set out the characteristics of well-designed places and determines what good design means in practice. It builds on paragraph 130 of the National Planning Policy Framework requirement to avoid development of poor design and forms part of the government’s collection of planning practice guidance. The guide states that: “well-designed places have individual characteristics which work to create its physical character” and establishes ten characteristics to nurture and sustain a sense of community. Of particular relevance to undertaking this assessment is the characteristics ‘Context’ and ‘Identity’.

1.37 Paragraph 38 under the Context characteristic states: *“An understanding of the context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments. It means they are well grounded in their locality and more likely to be acceptable to existing communities.”*

1.38 Whilst Paragraph 49 under the Identity characteristic states *“The identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them. It is not just about the buildings or how a place looks, but how it engages with all of the senses. Local character makes places distinctive.”*

APPENDIX B

FULL TOWNSCAPE AND VISUAL IMPACT METHODOLOGY

Introduction

B.1 This TVIA has been undertaken in accordance the methodology set out below which draws on best practice guidance as published in the following documents:

- Guidelines for Landscape and Visual Impact Assessment (3rd edition)- Landscape Institute/ Institute of Environmental Management and Assessment (2013)
- ‘An Approach to Landscape Character Assessment’- Natural England (2014)
- Photography and photomontage in landscape and visual impact assessment Landscape Institute Advice Note 01/11
- Visual Representation of Development Proposals – Landscape Institute Technical Guidance Note 02/17 – March 2017

B.2 The TVIA is undertaken with a prior understanding of the nature of the development being proposed and the purpose is to assess how the particular proposals may affect the townscape and visual amenity of identified receptors or in other words the townscape as a resource and those who experience it. In line with best practice, whilst interrelated, townscape and visual effects are considered separately.

B.3 The first stage of the assessment is to gain a detailed understanding of the existing conditions and a baseline study is undertaken which reviews the existing townscape elements and features, characteristics, including reference to published character assessments. Visual receptors are identified along with specific viewpoints to establish the visibility of the existing site. The next stage considers the value of a particular townscape or view. This information is then used along with an assessment of the susceptibility to the proposed change to form a judgement about the townscape or visual sensitivity.

B.4 The development proposals are considered and the effects are described in relation to the townscape character, feature, or view etc. The magnitude of change is established on each townscape or visual receptor and combining an assessment of this with the established sensitivity, a conclusion is reached about any likely effects. This appraisal considers the proposals at different stages, from construction through to establishment of any mitigation. The effects can be either positive or negative or at times neutral.

Methodology for Appraisal of Townscape Effects

ESTABLISHING TOWNSCAPE SENSITIVITY

B.5 To assess the likely effects on the townscape the Townscape Sensitivity is established through a consideration of the Townscape Value and the Susceptibility to Change.

The Townscape Value

B.6 Townscape Value is determined through an assessment of the character of the townscape, its scenic qualities and condition, the elements and features that it contains, and any specific value attached to the townscape whether formally eg through a designation; or informally eg local connections historic or artistic connections or a local landmark. Townscape Value is categorised in Table B.1.

Townscape Susceptibility to Change

B.7 The susceptibility of the townscape is concerned with establishing whether or not the townscape, be it a particular character area, townscape type or element can accommodate the proposed development without unacceptable negative consequences. The levels of susceptibility are assessed using the criteria used in Table B.2.

Townscape Sensitivity

B.8 The sensitivity of the townscape is derived by combining the judgements on Townscape Value and Susceptibility to Change described in Table B3.

Table B.1 – Townscape Value

Value	Typical criteria	Typical scale of importance/rarity	Typical examples
Exceptional	A townscape in excellent condition; of high importance, rarity and high scenic quality. No potential for substitution	International	World Heritage Site
High	A townscape in very good condition; of high importance with good scenic quality and rarity. Limited potential for substitution	National, Regional, Local	National Park, AONB, SLA Conservation Area
Medium	A townscape in generally good condition; with moderate importance and scenic quality. Limited potential for substitution.	Regional, Local	Undesignated but valued perhaps expressed through non-official publications or demonstrable use
Low	A townscape in poor condition or with low scenic quality and importance. Considerable potential for substitution.	Local	Areas identified as having some redeeming feature or features and possibly identified for improvement
Poor	A degraded townscape in poor condition and no scenic quality and low importance	Local	Areas identified for improvement / recovery.

Table B.2 – Townscape Susceptibility to Change

Susceptibility to change	Criteria
High	An area possessing particularly distinctive townscape elements, characteristics or sense of place, and few townscape detractors. A townscape with limited tolerance to change of the type proposed. Or where the proposed development would be in direct conflict with specific townscape management or planning policies.
Medium	An area with some distinctive townscape elements, characteristics, or clearly defined sense of place, but with some townscape detractors. A townscape which is partially tolerant to change of the type proposed.
Low	An area with recognisable townscape character, but few distinctive townscape elements, characteristics, and some, or a number of townscape detractors. The townscape is tolerant of some change of the type proposed. Or Where the character area is separated by distance or features so as to have little or no direct relationship with the site/and or proposed development.
Very Low	An area with limited or no distinctive townscape elements, characteristics, or weak sense of place, and many townscape detractors. An area that is tolerant of substantial change of the type proposed. OR Where the character area is separated by distance or features so as to have no direct relationship with the site/and or proposed development.

Table B.3 – Townscape Sensitivity

Value	Townscape Sensitivity		
High	High	High	Medium
Medium	High	Medium	Low
Low	Medium	Low	Low
	<i>High</i>	<i>Medium</i>	<i>Low/Very Low</i>
	Susceptibility to Change		

ESTABLISHING MAGNITUDE OF CHANGE

B.9 In order to establish the magnitude of change of the proposed development, including both the loss of existing features and replacement with new elements, an assessment is made which considers the size, scale, duration and reversibility of the effect on the townscape.

B.10 Magnitude of Change of the Townscape Effect is assessed following the criteria set out in Table B.4.

Table B.4 – Townscape Magnitude of Change

Magnitude of Change	Criteria
High	Where the proposals (or works to facilitate them) would result in the total loss or major alteration of the elements that make up the character of the baseline townscape. Where the introduction of elements are considered to be wholly uncharacteristic in the particular setting. Where the effects of the proposals would be experienced over a large scale and/or influence more than one townscape type/character area.
Medium	Where the proposals (or works to facilitate them) would result in the partial loss or alteration of one or more of the key elements that make up the character of the baseline townscape. Where the introduction of new features may be prominent but not necessarily wholly uncharacteristic in the particular setting. Where the effects of the proposals would be largely experienced within the townscape type/character area within which they will sit.
Low	Where the proposals (or works to facilitate them) would result in minor loss or alteration of one or more of the key elements that make up the character of the baseline townscape.
Negligible/None	Where the proposed scheme (or works to facilitate it) would result in very minor loss or alteration of one or more of the key elements that make up the character of the baseline and / or the introduction of elements that may not be uncharacteristic in the particular setting and/or Where the proposal occur within other character areas or types and their introduction by virtue of distance will have limited or no effect on the baseline character area.

ESTABLISHING THE OVERALL APPRAISAL OF TOWNSCAPE EFFECTS

B.11 To establish the overall townscape effects, the assessments of ‘sensitivity’ and ‘the magnitude of change’ are combined as shown in Table B.5. At times, it may be judged that the effects are negligible or neutral or, as a result of professional judgement, may be varied from a strict application of the matrix below, where this is the case, justification is provided within the main text of the TVIA. The effects can be positive/beneficial, negative/adverse or neutral. The criteria applied is set out in Table B.6.

Table B.5 – Townscape Effects

Sensitivity	Overall Assessment of Townscape Effects			
High	Major	Major /to moderate	Moderate	Minor to/ Negligible
Medium	Major /to moderate	Moderate	Moderate to / minor	None
Low	Moderate	Moderate to / minor	Minor	None
	High	Medium	Low/Very Low	Negligible/None
	Magnitude to Change			

Table B.6 – Townscape Effects Criteria

Beneficial Criteria – Where the proposals
Fits well with scale / landform and/or pattern of townscape
Increases characteristic features or enhances the contribution to the wider setting
Enhances balance of townscape elements
Improves the sense of tranquillity
Provides ability to include adequate or appropriate mitigation
Complements local/national planning policies or guidance to protect townscape character
Adverse Criteria – Where the proposals
Is out of scale with surrounding townscape / landform and/or pattern of townscape
Results in a loss of key townscape features or characteristics or a deterioration in contribution to setting
Disrupts the balance of townscape elements
Reduces the sense of tranquillity
Lacks ability to include adequate or appropriate mitigation
Conflicts with local/national planning policies or guidance to protect /manage townscape character
Neutral Criteria
Where the change (whatever the scale) resulting from the proposals will have an indiscernible effect on the character or characteristics of an area
Where any change will see one or more elements replaced with another of similar form/extent so as to result in an effect that on balance is neither positive or negative

Methodology for Appraisal of Visual Effects

ESTABLISHING VISUAL SENSITIVITY

B.1 To assess the likely effects on views / visual amenity the sensitivity of the receptors (ie those looking at the view) is established through a consideration of the Value and the Susceptibility to Change of a particular viewer or viewpoint.

Value

B.2 Value of a particular view is determined through an assessment of the location, the nature of the view, its scenic qualities and condition, the elements and features that it contains and is categorised in Table B.7

Table B.1 – Representative View Value

Value	Typical Criteria
High	Where the view is are of a highly exceptional nature, of high scenic value, often within, towards or across a townscape with a national designation or heritage assets, or a planning policy designation; and/or mentioned in a number of guidebooks or on tourist maps; and/or referenced in art and literature.
Medium	Where At a national level the National Planning Policy Framework (NPPF), published on February 2019, have a generally high scenic value. The view may be within, from or towards a designated heritage asset, or a planning policy designation; and/or mentioned in a number of guidebooks or on tourist maps; and/or referenced in art and literature but there may be some incongruous features or elements within in the view.
Low	The view from the representative viewpoint is not related to designated, or non-designated, heritage asset, or a planning designation; and/or mentioned in a guidebooks or on tourist maps; and/or referenced in art and literature; and/or of little visual amenity importance. Considerable potential for substitution of some elements in the view.
Poor	The view from the representative viewpoint is unsightly and of low importance. Considerable potential for substitution of some or all elements in the view.

Visual Susceptibility to Change

B.3 The assessment of susceptibility is concerned with establishing to what extent the visual receptor can accommodate the change in the nature of the view or the visual amenity of the view resulting from proposed development. In establishing susceptibility the circumstances in which the view is experienced eg does the view form part of the reason for being in a particular location (visiting a local landmark), or is it secondary to the reason for the person being in a particular location (eg a daily commute to work by car). Each visual receptor is described within the assessment and typical viewpoints are selected and photographed to provide a representation of the views.

B.4 The levels of susceptibility are assessed using the criteria set out in Table B.8. It should be noted that the susceptibility of the receptors may be reduced if the quality nature of the view is lower.

Table B.8 – Representative View Susceptibility to Change

Susceptibility to change	Criteria
High	Where the receptor is engaged in outdoor recreation including public rights of way and their attention is likely to be focused on the townscape or particular views. Visitors to heritage assets or visitor attractions where the views to the townscape or surroundings are an important part of the experience. Residents at home where views contribute to the setting of a residential area.
Medium	People walking around a residential area or visiting retail outlets or other destinations as a leisure activity, or at a place of work, where the views to the townscape or surroundings are make a positive contribution to the experience OR where the receptor, normally categorised as High, is located in an area of poor scenic value where the views to the surrounding area are unlikely to be the main focus of attention (eg walking routes to work).
Low	People engaged in outdoor sport or recreation that does not depend on an appreciation of the view. People travelling by road or rail (unless the route is specifically identified for its views). People at work or in a workplace or a place of education where the views to the townscape or surroundings are not important

Visual Sensitivity

B.5 The sensitive of the receptor is derived by combining the judgements on Value and Susceptibility to Change as set out in Table B.9.

Table B.9 – Representative View Sensitivity

Value	Townscape Sensitivity		
High	High	High	Medium
Medium	High	Medium	Low
Low	Medium	Low	Low
	<i>High</i>	<i>Medium</i>	<i>Low/Very Low</i>
	Susceptibility to Change		

VISUAL EFFECTS

B.6 The proposals are described within the report and their effects on the receptor and their visual amenity are assessed.

ESTABLISHING MAGNITUDE OF CHANGE

B.7 In order to establish the magnitude of change of the proposed development an assessment is made on the size and scale of the effect, the geographical extent of the effect and its reversibility or otherwise. The proposed scheme is considered based on the nature of the proposals, and a professional interpretation is made in respect of each receptor.

B.8 Magnitude of Change of the Effect on the Visual Receptor is assessed using the criteria set out in Table B.10.

Table B.10 – Representative View Magnitude of Change

Magnitude of Change	Criteria
High	Where the proposals (or works to facilitate them) would result in the total loss or major alteration of the elements that make up the view from a particular location. Where the introduction of elements are considered to be totally uncharacteristic in the particular setting. Where the effects of the proposals would be visible over a large scale and / or at close range
Medium	Where the proposals (or works to facilitate them) would result in the partial loss or alteration of one or more of the key elements that make up the view from a particular location. Where the introduction of new features may be prominent but not necessarily wholly uncharacteristic in the particular setting. Where the effects of the proposals would be largely seen from further afield or as only part of a view.
Low	Where the proposals (or works to facilitate them) would result in minor loss or alteration of one or more of the key elements that make up the view from a particular location. Where the introduction of elements would not generally be considered uncharacteristic in the particular setting.
Negligible / None	Where the proposed scheme (or works to facilitate it) would result in a very minor loss or alteration to the view and / or the introduction of elements would not be uncharacteristic in the particular setting. Where the effects of the proposals would only be seen from a distance and be imperceptible within the context of the wider view.

ESTABLISHING THE OVERALL ASSESSMENT OF VISUAL EFFECTS

B.9 To establish the overall assessment or otherwise of the visual effects, the sensitivity of the visual receptor and the magnitude of change are combined. The results can either be positive/beneficial or negative/adverse. It may also be the case that there are no effects or that effects are judged to be neutral in such instances this will be explained within the text.

Table B.11 – Representative View Effects

Sensitivity	Overall Assessment of Visual Effects			
High	Major	Major /to moderate	Moderate	Minor to/ Negligible
Medium	Major /to moderate	Moderate	Moderate to / minor	None
Low	Moderate	Moderate to / minor	Minor	None
	<i>High</i>	<i>Medium</i>	<i>Low/Very Low</i>	<i>Negligible/ None</i>
	Magnitude to Change			

B.10 The effects can be positive/beneficial, negative/adverse or neutral. The criteria applied is set out in Table B.12.

Table B.12 – Representative View Effects Criteria

Beneficial Criteria – Where the proposals
Fit comfortably within the view
Improves the view or an element within the view
Do not result in an incongruous feature within the prevailing pattern of townscape
Do not obstruct views towards a high quality or scenic townscape
Do not obstruct views or detracts from the visual amenity of a view towards a heritage asset.
Offers the ability to provide mitigation that will enhance the view or visual amenity.
Complements local/national planning policies or guidance on visual amenity or specific views.
Adverse Criteria – Where the proposals
Result in a change to the view or visual amenity that out of scale with surrounding townscape / landform and/or pattern of townscape
Results in a loss of positive townscape feature or characteristics within a particular view
Results in incongruous features within the prevailing pattern of townscape
Obstructs a view towards a high quality or scenic townscape.
Obstructs views or detracts from the visual amenity of a view towards a heritage asset.
Lacks ability to include adequate or appropriate mitigation
Conflicts with local/national planning policies or guidance to protect /manage visual amenity or specific views.
Neutral Criteria
Where the change (whatever the scale) in the view resulting from the proposals neither improves or damages the view or existing visual amenity of a view

APPENDIX C

REPRESENTATIVE VIEW APPRAISAL

C

Appendix C

Representative View Appraisal

Introduction

- C.1 A selection of representative views has been identified to recognise and assess the likely effects of the Scheme Proposal on the identified visual receptors, as shown in **Figure 3.4**. AVRs have been prepared for each of these representative views. Table 4.2 summarise the findings of this visual impact assessment.
- C.2 The AVRs provide two-dimensional representations of a complex scenic experience and as such are indicative. They have, however, been chosen to give an impression of the maximum effect of the Scheme Proposal in the viewing experience. These views are kinetic and variable in nature when experienced within the townscape.
- C.3 The imagery is no substitute for the actual visual experience from a representative view. It is essential when considering these views that the individual is aware of the viewing experience at each location and to be aware of traffic noise, weather, the surrounding buildings and any other similar matters. It is therefore recommended that this document is taken on site to fully appreciate the nature of the viewing experience in each representative view location.
- C.4 The selection of representative views considers the location of both conservation areas and surrounding townscape. In determining the effects of the Scheme Proposal, a judgement is made regarding the design quality of the completed scheme. This is informed by the AVR's and the supporting planning application information.
- C.5 The rationale behind why some AVRs are fully rendered and some are wireline is based on the distance from the Site; the identified sensitivity of the view; and, whether the inter-visibility between the Site and the viewpoint is prevented by built form or vegetation.
- C.6 **Appendix D** contains the methodology used for the AVRs produced by Cityscape. Within the blue wireline AVRs, where the buildings fall behind built form, or significant vegetation, the Scheme Proposal's mass has been shown with a dash demonstrating that they are unlikely to be seen within the view. The cumulative scheme of Lockcorp House is shown as a red wireline.



01
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Twickenham Green



02
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Warwick Road (South)



03
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Edwin Road (West)



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May Road (North)



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Kneller Gardens



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Craneford Way Recreational Ground



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Footbridge crossing the railway



Table of Views

View	Location	Page	Style	Render/ Wireline	Ref	OS-E	OS-N	Height (AOD)	Heading	Lens	Field of View	Film	Date	Time
1	Twickenham Green	36	AVR-1	Wirelines	D17843	515257.65	172852.33	11.81	6.86°	24mm	74°	Digital	22/12/18	09:13
2	Warwick Road (South)	38	AVR-3	Render	D17844	515411.52	173208.79	12.51	286.73°	24mm	74°	Digital	22/12/18	09:52
3	Edwin Road (West)	40	AVR-3	Render	D17845	515306.00	173191.59	12.14	355.90°	24mm	74°	Digital	22/12/18	09:47
4	May Road (North)	42	AVR-3	Render	D17836	515189.62	173281.60	11.70	64.11°	24mm	74°	Digital	18/12/18	13:13
5	Kneller Gardens	44	AVR-1	Wirelines	D17846	514647.08	173306.27	16.41	75.95°	24mm	74°	Digital	22/12/18	08:50
6	Craneford Way Recreational Ground	46	AVR-3	Render	D17847	515402.75	173565.00	10.27	193.38°	24mm	74°	Digital	22/12/18	08:20
7	Footbridge crossing the railway	48	AVR-3	Render	D17848	515561.83	173428.18	16.84	254.35°	24mm	74°	Digital	22/12/18	08:30

