2.12 Townscape Accurate Visual Representations (AVRs)

The following seven views have been identified by the appointed Townscape and Visual Impact Assessment consultant, Arc Landscape Design and Planning Ltd, to test the effect on the townscape.

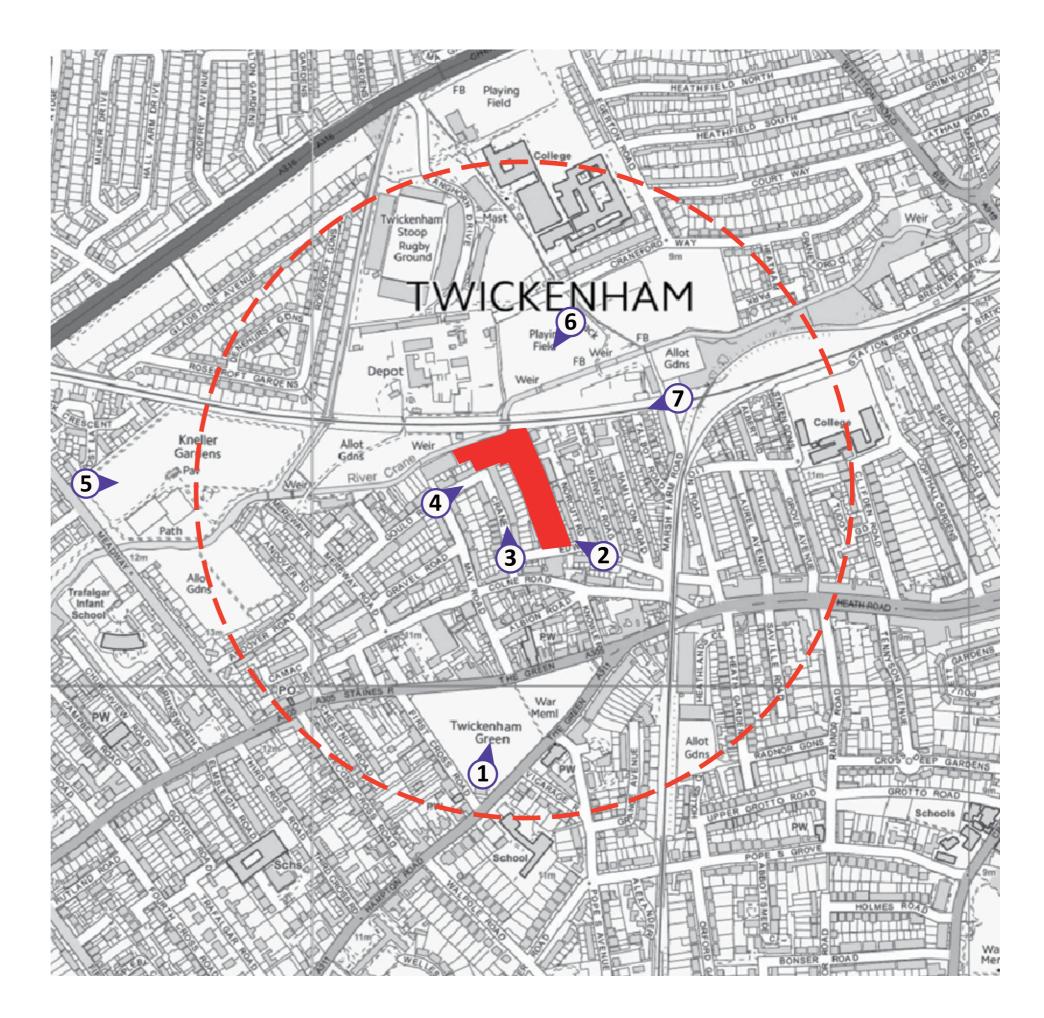
These views were chosen early on in the process and agreed with LBRuT to inform the design evolution. Our proposal has been developed to respond to these views and ensure the scheme fits comfortably into the existing context.

A full Townscape and Visual Impact Assessment has been submitted separately in support of this application.

Views -

- 1. Twickenham Green's south corner, adjacent to the cricket pavilion, looking north
- 2. Southern pavement of the junction between Warwick Road and Edwin Road, looking north west
- 3. Western pavement of the junction between Crane Road and Edwin Road, looking north
- 4. South western pavement of the junction between Gould Road and May Road, looking east
- 5. Kneller Gardens western corner, looking east
- 6. Craneford Way Recreational Ground eastern side (to the south of the playground) looking southwest
- 7. Footbridge crossing the railway, looking south west

Notably, the proposed massing and design was supported as part of the refused application and is unchanged for this application.





Twickenham Green's southern corner, adjacent to the cricket pavilion, looking north



South western pavement of the junction between Gould Road and May Road, looking east



Footbridge crossing the railway, looking southwest



Southern pavement of the junction between Warwick Road and Edwin Road, looking northwest



Kneller Gardens western corner, looking east



Western pavement of the junction between Crane Road and Edwin Road, looking north



Craneford Way Recreational Ground eastern side (to the south of the play ground) looking southwest

2.13 Planning policy context

The development plan for the London Borough of Richmond upon Thames comprises:

- The NPPF (2021)
- The London Plan (2021)
- The London Borough of Richmond upon Thames Local Plan (July 2018)

London Borough of Richmond are currently reviewing and updating their Local Plan. The draft Plan is currently in early stages of preparation with an adoption not anticipated until Autumn 2024.

There are also a number of supplementary guidance documents published by the GLA and London Borough of Richmond which have been taken into account during the course of the design development and preparation of the proposed scheme.

The Site is subject to the following designations within the Local Plan (July 2018):

- Archaeological Priority Area
- · Key Office Area West Twickenham Cluster
- Locally Important Industrial Land and Business park West Twickenham cluster (including Greggs Bakery and surroundings), Twickenham.

The existing Bakery site (B2 Class Use) is identified within the 'West Twickenham Cluster (including Greggs Bakery and surroundings), Twickenham' designated Locally Important Industrial Land and Business Park. The site is also located within the 'West Twickenham Cluster' Key Office Area.

Given the site's location within a primarily residential area and the identified amenity impacts and site constraints associated with HGV movement to and from the site, the continued use of the site entirely for employment led floorspace is considered unsuitable.

Furthermore, there is an acute housing shortage across London and the site is considered appropriate to deliver an important contribution to the overall housing supply and affordable housing offer within the Borough. The proposals therefore comprise a sensitive residential-led scheme alongside industrial floorspace.

The scheme has been carefully designed and responds to the site constraints and surrounding context in accordance with the Local Plan Policies LP 1 (Local Character and Design Quality); LP2 (Building Heights); LP17 (Green Roofs); LP5 (Views and Vistas); LP8 (Amenity and Living Conditions); LP31 (Playspace); LP35 (Housing Mix and standards); LP22 (Sustainable Design and Construction).

In summary, the current proposals will deliver the following public benefits which are considered to outweigh any loss of the redundant employment space:

- Delivering 97 residential dwellings which will contribute to the Borough's much needed housing supply;
- 1000 sq m of light industrial (Use Class E) floorspace will be provided in line with highways constraints and local need;
- · Affordable housing will be provided on site, comprising 20% by unit;
- Development of a brownfield site;
- Significant amenity improvements to neighbouring properties by providing residential into the existing settlement area and Use Class E where appropriate;

- Significant highways improvement will be achieved by reducing the amount of HGV's trips along on residential streets;
- Opportunities for opening up access to the River Crane at the northern end of the site for landscaping and playspace.
- Creating a new street scene and improving the visual appearance of the site.

2.14 Planning history

2.14.1 Planning decision review (19/0646/FUL_)

Following a recommendation for refusal from the London Borough of Richmond upon Thames, the planning committee resolved to refuse the residential-led mixeduse scheme on 5th August 2020 for the reasons outlined in the officer's report. A summary of the supported and refused aspects are set out below.

Aspects supported (aside from two reasons for refusal)

- Provision of residential dwellings on the site as part of a mixed-use scheme
- General approach to design, with officers highlighting the visual improvements as a result of the proposed scheme
- Proposed height, density and massing including the provision of a five storey building on site
- Enhancements in relation to energy efficiency as well as planning and habitat enhancements proposed along the River Crane
- · Standard of residential accommodation and amenity space
- Impact on amenity to surrounding properties in terms of daylight/sunlight and overlooking
- · Acceptable parking provision and no adverse highways impact
- · Public support for the scheme

Reasons for refusal

- Reduction of industrial floorspace at a site designated as Locally Important Industrial Land and Business Park
- Lack of binding obligation to secure early and late stage reviews relating to affordable housing provision

The reasons for refusal along with our response to the comments are outlined in more detail below. This application seeks to address the reasons for refusal where possible.



Refused scheme ground floor plan

Loss of industrial floorspace comment

The proposal would result in a significant reduction in the amount of industrial floorspace at a site designated as Locally Important Industrial Land and Business Park. Without adequate replacement floorspace, would reduce employment opportunities within the locality, contrary to the aims of the Council's employment policies. The proposal would therefore fail to comply with Policies LP40 and LP42 of the Local Plan (2018), the Greater London Authority (GLA) Industrial Land Demand Study (2017), the GLA Industrial Land Supply and Economy Study (2015), and the Mayor of London's Land for Industry and Transport Supplementary Planning Guidance (2012).

Affordable housing comment

Without a binding obligation to secure early and late stage viability reviews, the proposal fails to demonstrate the level of affordable housing proposed would be maximised within this development and therefore does not compensate adequately for the substantial loss of employment floorspace nor contribute fully to the identified need in the borough for affordable housing and is therefore contrary to policies LP36, LP40 and LP 42 of the Local Plan (2018) and the Affordable Housing Supplementary Planning Document.

Loss of industrial floorspace response

The existing buildings are in need of replacement and have laid empty since Greggs vacated the site in 2016. Due to the vehicle access constraints, there is limited opportunity for industrial / commercial uses on the site that would not create conflict in this residential area.

In this resubmitted application, the applicant's aim is to achieve the maximum re-provision of industrial floorspace suitable for the site and its context, as detailed on pages 33 and 34 of this report.

Affordable Housing Response

The previous full residential-led mixed-use scheme proposed 40% affordable homes equating to 46 dwellings. The tenure mix was agreed with the Council's Housing department and the Applicants. This was secured by a Unilateral Undertaking however the legal mechanism needed to secure a financial appraisal requires a bilateral agreement.

This new proposal continues to offer affordable housing.







Introduction

Context

3.0 Design process

Design response

Landscape

Technical design

Access

Appendices

3.1 Introduction

This section outlines the design constraints and opportunities for a mixed-use scheme and the subsequent design and consultation process to develop the proposals. The scheme is based on the agreed principles of the previously submitted and rejected residential scheme, but amended to deliver the maximum industrial floorspace that local roads can accommodate on this site

3.2 Design constraints

Existing access points

Approved affordable housing scheme

Hamilton Road Conservation Area 72

Sun path

The following constraints have been considered and mitigated. This analysis has informed the design principles.

Site boundary

Main sewer lines and associated restriction of 1.5m clearance either side

Noise and air pollution from railway and neighbouring commercial site

Railway level at the same level as the site

Existing house within the site boundary

18 metres overlooking distances

8 metres river access requirement for Environmental Agency

Potential sunlight, daylight and overshadowing considerations

Surrounding storey heights

View from park

Adjacent townhouses close to site boundary

Constrained access roads unsuitable for HGV commercial vehicles



3.3 Is a full industrial scheme achievable on the site?

A fully industrial scheme to replace the existing operation was reviewed at the outset of the project to establish its feasibility. Constraints to developing an industrial scheme are as follows:

- Substantial sewer main running down the site, where a build-over agreement
 would not be acceptable, and thus prevents large span industrial units being
 developed.
- Site access, parking and vehicle movements limit the number and types of vehicles that can access the site to mitigate significant congestion and ensure pedestrian safety.
- Noise and fumes prevent large-scale or odour-creating types of industrial uses due to causing nuisance to near by neighbours - as reported by Greggs on the existing use.
- **Building heights and overshadowing -** would need to be considered to avoid impacting nearby neighbours; typical industrial buildings have a minimum 8m clear internal height, larger than most two storey houses.

The scheme shown to the right explored a fully industrial scheme when factoring in the sewer main and impact of building heights. This achieved 3,773 sq m of ground floor footprint, rising to circa 6,223 sq m if the larger building is increased to three storeys, equating to 68% of the existing industrial space on-site, 95 parking spaces and six dedicated loading areas.

On reviewing the scheme, the transport consultant advised that the HGV vehicle trip generation from this size scheme would not be viable on the surrounding road network, resulting in an undeliverable scheme. Additionally, the industrial space consultants advised that, due to the limitations on vehicle access, this amount of space would not be lettable - further demonstrated by the marketing evidence submitted in support of this application.

Therefore, the conclusion was that a fully industrial scheme was not deliverable on this site, without restrictions on access and types of uses, which then in turn makes the scheme unviable.

Following this, the transport consultant undertook a review on maximum HGV and delivery vehicle movements that the surrounding road network and site access points could accommodate to provide the maximum deliverable industrial area - this is explored on the next page.



Ground floor



Second floor

Full industrial scheme of B1/B2/B8 uses achieving 3,773 sq m (one to three storeys) $\,$



First floor



Roof plan

3.4 Achievable industrial re-provision

The applicant's aim is to achieve the maximum re-provision of industrial floorspace suitable for the site and its context. The remainder of the site would then be provided as much-needed residential homes at a mix of tenures.

The main barrier to industrial re-provision is the access to the site, which is via narrow roads unsuitable for HGVs. A clear history of vehicle conflicts and the damage to parked cars and pavements is fully documented in the transport consultant's supporting report. In addition, the significant sewer line running through the middle of the site requires that any future development accommodates full access and should not be built over.

A transport assessment has calculated the maximum floor area that could be provided on-site taking into consideration the amount of vehicle trips and HGV conflicts generated by different industrial uses. The options to the right illustrate the maximum floor area of each industrial use class in the most appropriate location for industrial at the southern end of the site.

Table 3-6: Maximum Industrial Floorspace

INDUSTRIAL USE CLASS	MAXIMUM FLOOR AREA (SQM)
B2	790
E(g)(iii)	900
B8 Warehouse	735
B8 Distribution	555



One storey with mezzanine of Use Class B2 (790 sq m)



One storey with mezzanine of Use Class E(g)(iii) (900 sq m)



One storey of Use Class B8 Warehousing (735 sq m)



One storey of Use Class B8 Distribution (555 sq m)

3.5 Industrial use design constraints & opportunities

The following constraints have been considered and mitigated. This analysis has informed the design principles.

Key

Site boundary (proposed industrial area)

Division line to suit maximum industrial floorspace possible

Main sewer lines and associated restriction of 1.5m clearance either side



Noise and air pollution from neighbouring commercial sites



Setback main warehouse structure from adjacent townhouses with only a single storey element / landscaping to mitigate DLSL overshadowing



Surrounding storey heights

Existing factory footprint



Existing access points



Constrained access roads unsuitable for HGV commercial vehicles



Sun path

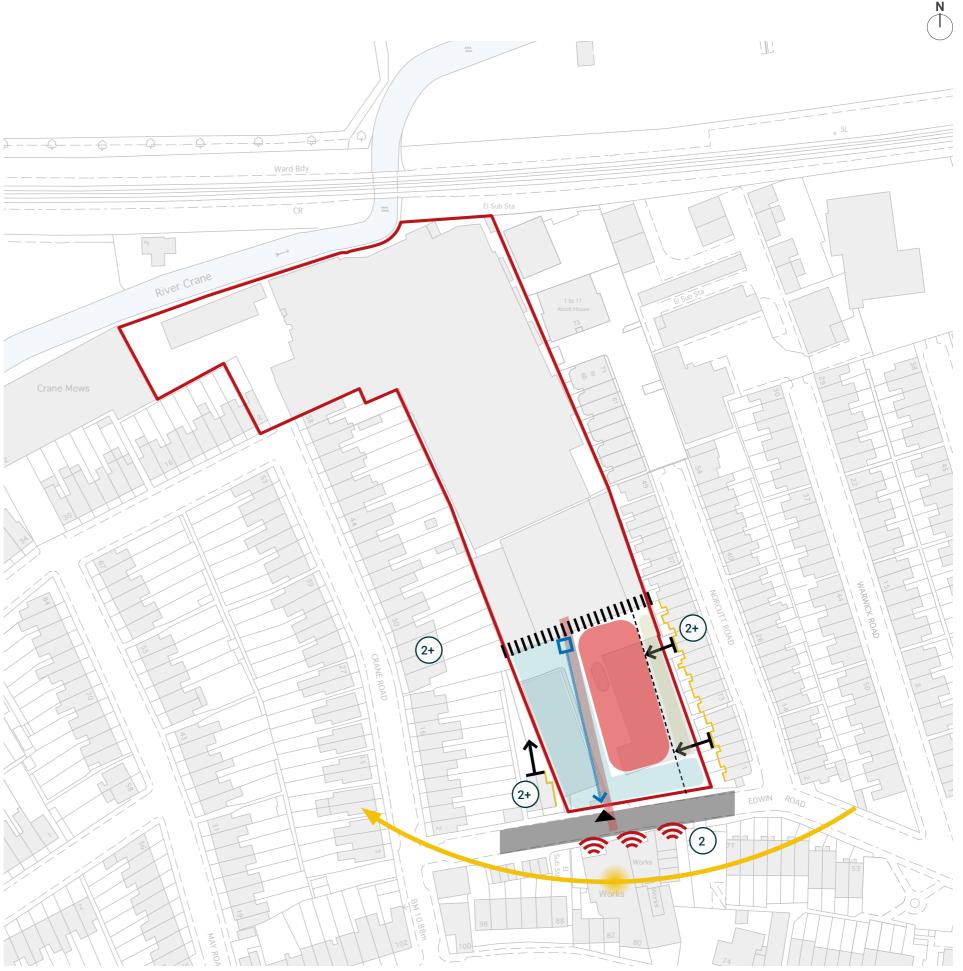


Sufficient access, parking and manoeuvring space of large vehicles



Appropriate industrial footprint

New vehicle route



Industrial design constraints and opportunities diagram

3.6 Residential use opportunities

The rest of the site is considered most suited for residential use, repairing the urban grain of the area. Whilst taking into account the site constraints, opportunities for this typology have been identified.

Key Site boundary ШШ Division line to suit maximum industrial floorspace possible Introduce urban grain of surrounding residential streets Massing set-back from boundaries with gardens to the east and west Improved riverside access with landscaping Opportunity for height in centre of site Buildings mass within existing building footprint in centre of site with least impact to surrounding Residential buildings set-back from railway and river Existing access points New vehicle route Safeguard area in landscape for potential future bridge link Pedestrian connection to the river Sun path Approved affordable housing scheme 2+ Surrounding buildings number of storeys

Main sewer lines and associated restriction of 1.5m clearance either side

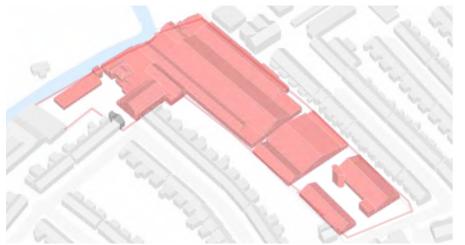
8 metres river access requirement for Environmental Agency

18 metres overlooking distances



3.7 Design principles

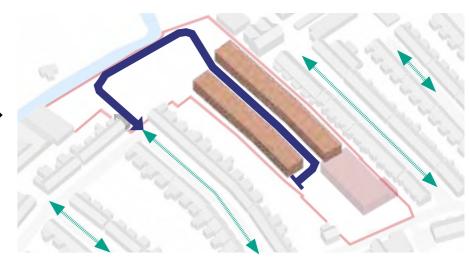
A number of design principles have been set out that underpin our design approach. These are illustrated in the following sequence of diagrams



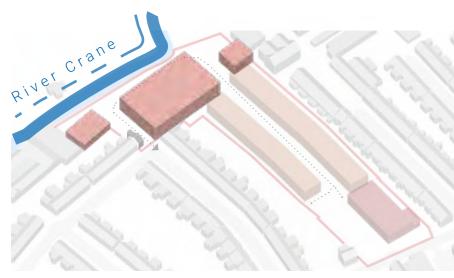
1. Remove all existing buildings with the exception of the end terrace house



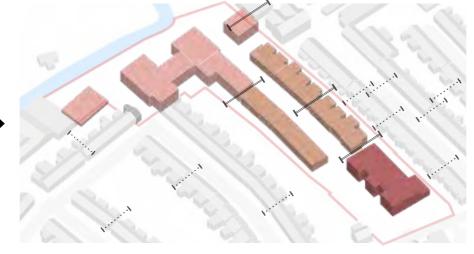
2. Industrial floorspace accessed from Edwin Road to respond to the road's existing character and minimise adverse impacts on highways and residential amenity



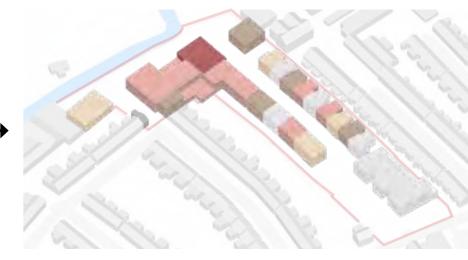
3. New residential buildings either side of access route from Crane Road , orming new terraced street connecting to the existing residential street grain



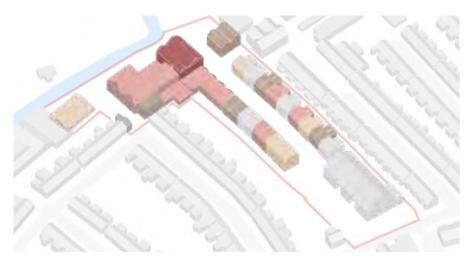
4. Larger residential building footprints towards the river and railway edge



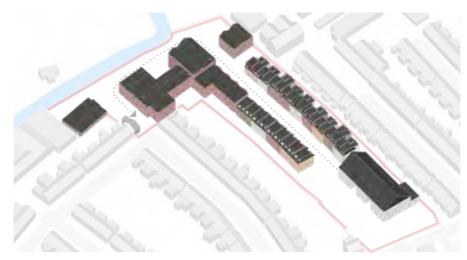
5. Articulation of massing into collections of buildings with breaks, in keeping with the surrounding context



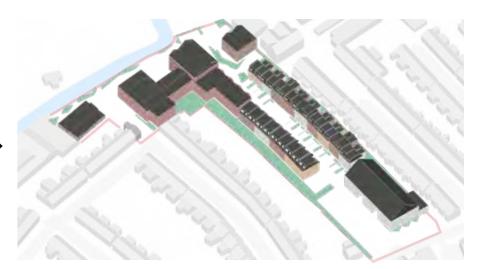
6. Variation in materiality to reflect the surrounding street characters



7. Heights and layout to respond to the context and blend it into the townscape (massing unchanged for residential from refused scheme)



8. Developed roofscape to respond to the context



9. Optimise landscaping to riverside, gardens and new street

3.8 Industrial building design process

3.8.1 Review of local influences

The developed design was informed by surrounding textures and materiality.





Wooden fence on brick piers



Metal fence on brick piers



Existing site materials include white and grey metals
Opposite site, shows metal roof on brick walls and pitched roofs





Opposite site, shows painted white bricks with metal fencing above



White plastered house adjacent to site

3.8.2 Review of local influences

The developed design was informed by surrounding industrial buildings. Most have brick as the main material with metal cladding finish. Additional detailing in the form of coloured reveals and horizontal banding/decorative brick courses add further interest.

Local precedents





Stadium

Council Depot



Industrial Units in Oriel Court





Industrial Units in Oriel Court

Youngs



Precision engineers



Diagram identifying the variety of local material finishes and details within the immediate context

3.8.3 Review of roof profiles

Various roofscapes were tested of up to 10m clear height to be considered usable industrial space.

Flat

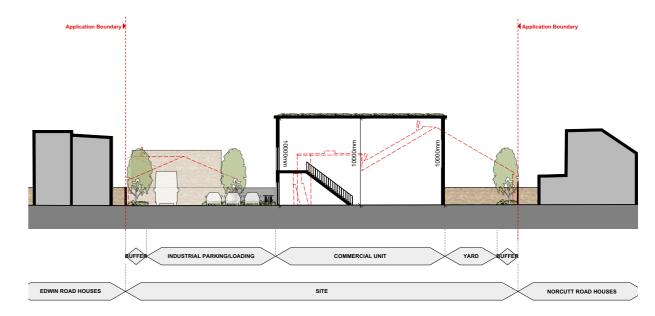
- Opportunity for green roof and skylights
- Most usable industrial GIA
- Detrimental impact on adjacent townhouses
- Non-standard industrial building form

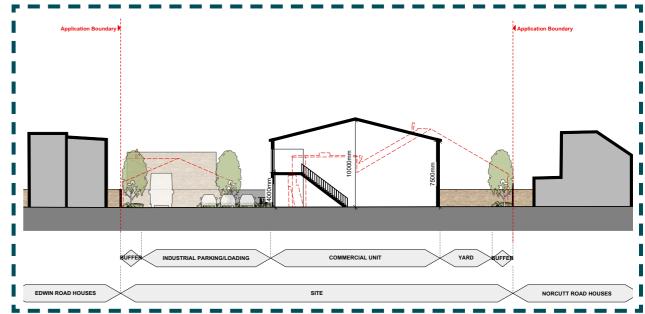
Traditional pitch (best response to context with the least compromise to industrial)

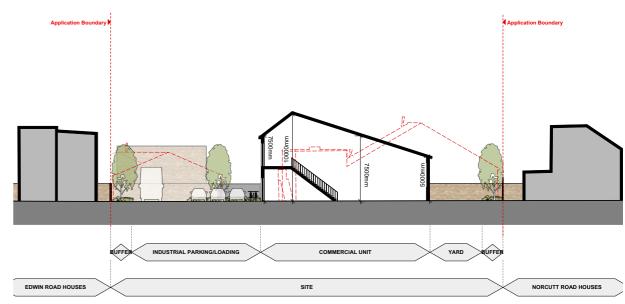
- Opportunity for solar panels and skylights
- Large usable industrial GIA
- Reduced impact on adjacent townhouses

Off-centre pitch

- Opportunity for skylights
- Compromised industrial GIA, reducing lettability and uptake
- Least impact on adjacent townhouses







Sections demonstrating various roof profiles tested

3.8.4 Industrial building materiality development

The design intends to unite the details and materials across the scheme. The options all include PV panels and rooflights on a metal standing seam roof to relate to the existing industrial uses within the surrounding context, as well as provide natural lighting to the industrial spaces. To reflect the existing wall, and for security, the industrial boundary is formed of a brick base with a wooden trellis between piers.

Models

- 1. Full red brick (reflecting current Greggs factories on site)
- 2. Dark timber effect cladding with green reveals
- 3. White metal cladding with red reveals

Renders

- 4. Light timber effect cladding with white painted brick base
- 5. Dark timber effect cladding with white painted brick base
- 6. White metal cladding with white painted brick base



Precedent - Hawkers Yard, Ruislip



Precedent - Eastman Edge, Harrow



Precedents - Signage on brick Precedent - Eastman Edge, Harrow



Full red brick



Dark timber effect cladding with dark green reveals



White metal cladding with red reveals



Light timber cladding with white painted brick base



Dark timber cladding with white painted brick base



Light timber cladding with white painted brick base

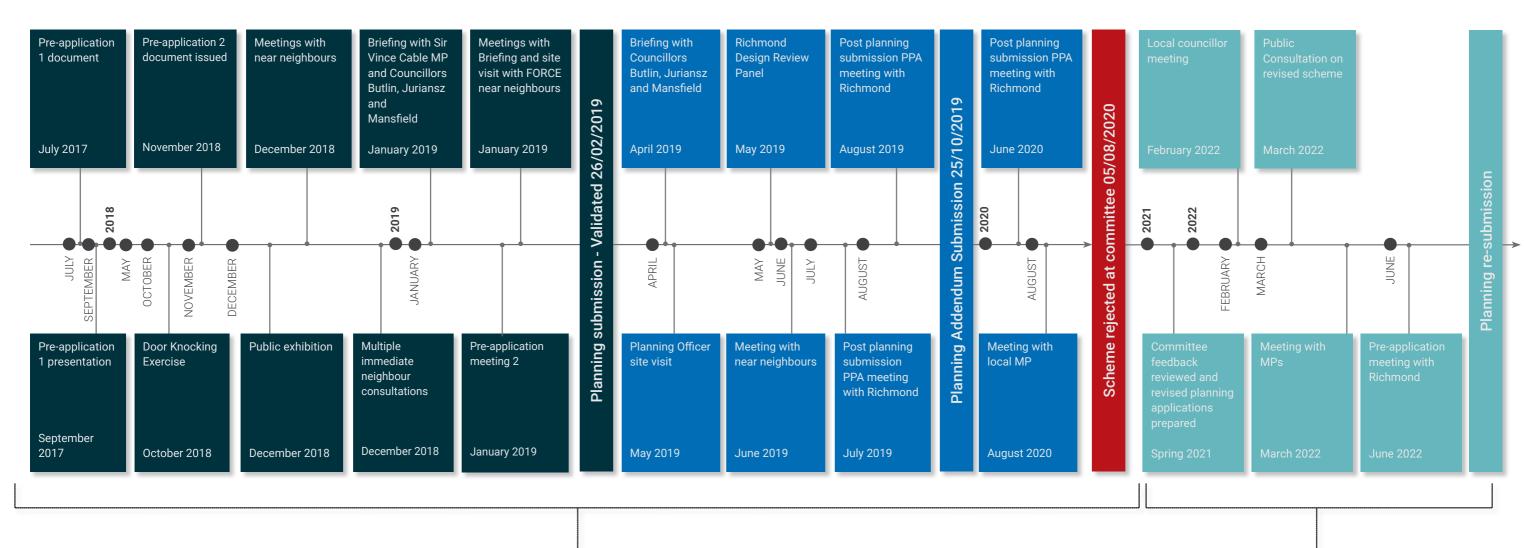


3.9 Consultation timeline

The diagram below summarises the consultation undertaken with key stakeholders. The consultation timeline includes that carried out as part of the rejected application 19/0646/FUL, which guided the design evolution of the residential proposals. This remains relevant to this updated proposal, though has been condensed for this document and is found in full within the appendix.

The principal aim of consultation was to provide the opportunity for all stakeholders to review and comment on the proposals. A 'Statement of Community Involvement' has been prepared by Cascade Communications in support of this application.

An updated public consultation has been undertaken on this revised application including a meeting with ward members, a meeting with local councillors, a preapplication meeting with Richmond planning officers and an in-person public consultation/exhibition event in mid-March.



Consultation on previously unsuccessful residential scheme

Consultation on current mixed-use scheme

Consultation prior to submission (19/0646/FUL) 3.10

Pre-application 1 proposal - 12th September 2017

The pre-application 1 proposal consisted of:

- 118 homes including 48 three bed houses and 70 apartments
- Mixture of both private and affordable
- 111 parking spaces including 17 garages
- 133,875 sq ft GIA
- 379 habitable rooms
- Density 107 Units/Ha or 344 Hr/Ha (site area 1.16Ha)

Preliminary mix:

- 27 x 1 bed apartments
- 39 x 2 bed apartments
- 52 x 3 bed apartments



Sketch - mews street pre-app 1



Sketch - mews street post pre-app 1

Key outcomes

- The proposal for a six storey building at the northern end of the site was considered excessive and over-development. This was revised and reduced to five storeys in one area and four storeys in another.
- The townhouses top floor was redesigned as a pitched / mansard roof to reflect the neighbouring loft conversions and to reduce visual impact.
- The houses fronting Edwin Road were revised to better respond to the surrounding context.
- The building forms were simplified and materials adjusted in response to comments made, fitting in better with the local context and reflecting the mix of
- · Landscaping along the River Crane was enhanced and parking along this area reduced.

Public exhibition - 3rd & 5th December 2018

A two-day public exhibition was held at the Crane Community Centre (3rd December) and the Twickenham United Reformed Church (5th December). Members of the design team were present to discuss the proposals and answer any questions.

Across both days, 105 residents, stakeholders and interested parties attended. The scheme presented was a mixture of 118 private and affordable houses and apartments, including 52 three bed houses and 66 apartments.

Key themes that were mentioned at the public exhibition and are addressed in the supporting planning documents include:

Land use

Generally, those who attended the exhibition were supportive of the principle of redeveloping the site for residential use. However, some regarded the delivery of 118 homes as too intensive for the site and expressed a desire to see some commercial or light industrial use incorporated into the overall masterplan.

Transport & access

On the whole, those who provided feedback considered this issue to be very important. There were also questions raised around traffic and the impact on the recently implemented Controlled Parking Zone.

Construction management

Feedback highlighted this as a very important issue, particularly with regards to construction vehicle/heavy vehicle movements on local roads.

Key outcomes

- The buildings located to the rear of the Gould Road properties was changed from a two storey apartment building to single storey houses, in response to concern about loss of views. The buildings were also moved off the site boundary.
- Overlooking to Crane Road properties was addressed through changes to the roof forms, reduction in roof terraces, a reduction in floor-to-floor heights to reduce the overall building heights, and retention of existing factory walls along the boundary.
- Reduced window sizes and openings facing outwards from the development.
- The opportunity for a future pedestrian bridge across the river was reviewed.
- · Parking management and the construction plan was further developed in response to neighbours' consultation.

Meetings with near neighbours (Various Dates - Nov/Dec/Jan)

A number of near neighbours along Crane and Norcutt Roads were visited to review their current view and access to daylight from their rear windows and gardens. This led to specific modelling of the massing of our proposals from these view points to establish how to improve their current outlook.



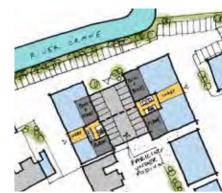
Massing - apartment building pre-app 1



Massing - apartment building post pre-app



Plan - Option 1



Plan - Option 2

Key outcomes

- · Change to roof line and parapet details of the proposals.
- Set-back the buildings further from the site boundary.
- Enhanced boundary treatments with trellis and additional planting.
- Retention of existing factory walls on the boundary to maintain privacy.

Pre-application 2 - 10th January 2019

The same scheme that was presented at the public exhibition was presented to the London Borough of Richmond upon Thames to ensure feedback was based on the same proposals.

The proposal included:

• 118 homes with a mix of private and affordable tenures

Density

- Site area 1.16 ha
- Density 102 dph/Ha or 344 Hr/Ha
- London Plan Density Matrix: within urban area PTAL 2/3 target 55-145 dph or 200- 450 hr/ha
- 32 x 1 bed (29%)
- 35 x 2 bed (28%)
- 38 x 3 bed (34%)
- 11 x 4 bed (9%)

Mix.



View of east terraced houses



View of west terraced houses

Key outcomes

- The officer noted that residential use is a deviation from policy. However, there was encouragement for family houses notwithstanding policy considerations.
- Incorporation of some mixed-use element was encouraged (Use Class E preferred). Thus, the two houses fronting Edwin Road were removed and a new commercial building proposed in its place. This resulted in 116 residential dwellings (47 houses and 69 apartments), and an E use commercial unit that will appeal to SMEs.
- It was advised that parking provision may be too high as Richmond are targeting car free schemes with change of local government. However, local residents are pushing for additional parking spaces and therefore a balance needs to be found.
- Design officer acknowledged improvements to the design since pre-application 1 and felt it had addressed most of the comments within the letter. Materials and aesthetics were positive. Five storey proposal in the context of the new Lockcorp House scheme (19/2789/FUL) is appropriate. Private amenity space standards for Richmond have been revised and are now in line with London Plan, so are
- Approves of a car club provision parking space and the provision of electric charging points welcome.

Councillor meeting - 11th January 2019

A meeting was held with Twickenham councillors, where the same scheme was presented as that displayed at the public exhibition and presented at the second pre-application meeting to ensure feedback was based on the same proposals.

In general, the proposals were well received, with the members receptive of the principle of the redevelopment. Specific comments were made regarding the potential for a commercial element, link through to the station, green energy and car parking provision.











Key outcomes

- The policy position to protect employment was noted.
- The councillor was interested to see if a small commercial unit might be feasible. This was incorporated along Edwin Road as also noted in pre-app 2 outcomes. This has been designed specifically for small start-ups and local businesses.
- It was noted that the neighbouring Crane Mews struggled to fill commercial space and is connected to residential.
- The councillors were pleased that family houses were being offered and they were interested to see a possible partnership with a housing association.
- It was felt that the entrance to Edwin Road was overly grand with the pillar columns suggesting a gated development. These were subsequently revised and reduced in scale.
- It was agreed that HGV traffic was inappropriate in this area and should not be reintroduced.
- Support for a bridge to link the site.
- Encouraged greater integration with the river and ecological improvements.

Friend of the River Crane (FORCE) - January 2019

An on site meeting and walk around was held with FORCE, where they took the teams through current projects and aspirations for the river.

Key outcomes

- FORCE were neither for or against the river crossing, but felt money would be better spent on other matters to enhance the existing condition.
- Encouraged designs to be more ambitious and create improved softening of the existing concrete riverbank, whilst acknowledging the residential neighbour opposite and restrictions this might bring.
- Encouraged by the riverwalk but were concerned this is connected from the rest of the path



Planning submitted landscape proposal



Proposed revision

Secured by Design - 4th February 2019

A Secured by Design meeting was held on Monday 4th February 2019. The design was reviewed and key issues highlighted by the SBD officers. A summary of the discussion and outcomes is outlined below.

Key outcomes

- Security There needs to be sufficient lighting towards the riverside to prevent loitering. Trees are to have high canopies along the mews street. Play space will need to be in line with SBD guidance and SBD rated. Garden walls to be 1.8 minimum with an additional trellis for extra height should it be required in the future.
- SBD hardware External bin and bikes stores need SBD rated bike anchor points - 'sold secure'. Internal bike stores in garages acceptable if the garage door itself is SBD rated. Garden doors need not be SBD rated in those houses with garden doors to rear of garages. Entry door to apartments to be above PAS standard.
- Access Apartment hallways should have airlock spaces at building entry points. Postal approach to be either multi post box mounted in external wall or hallway. Follow Royal Mail preference. Fob-in fob-out methodology for car park door to deter tailgaters.
- · All the above has been addressed in the planning submitted design.

Consultation post submission (19/0646/FUL) 3.12

Richmond Design Review Panel - 10th May 2019

Following a request from the London Borough of Richmond upon Thames post submission, a Design Review Panel (DRP) was arranged to present the scheme for feedback. The DRP took place on 10th May 2019 with a mixture of professionals included on the panel. Planning officers and ward councillors were also in attendance. The DRP included a site walk around before a presentation by the Architects, a discussion and then feedback.

Officers and the panel were generally aligned in their comments and responses as detailed here.

Summary of DRP comments:

- The site represents an ideal opportunity for providing new housing in the borough, regaining access to the riverfront and potentially creating a pedestrian link across the railway to connect with Twickenham Station;
- The Panel supports the idea of the residential street reflecting the surrounding context. The Panel acknowledge that, although the urban grain may be slightly tight, it does comply with the New London Plan standards for amenity space;
- Supportive of the industrial aesthetic and material palette;
- Given the industrial backdrop, overall the height is appropriate;
- Supportive of the clear public realm concept, however the location of car parking at the north end of the site and overall quantum was questioned;
- The space for the bridge landing feels compromised with car parking and playspace. This should be interrogated further and the bridge should be pursued;
- Concern around the size of the rear gardens of houses C15-C30 where neighbours are in close proximity. The gardens of D1-D4 also feel small;
- Concerns over the massing at the junction of Gould Road and Crane Road in relation to existing terraces and overlooking from the roof gardens on Building F;
- Fourth storey and balconies to the western end of Building F could have a negative impact and potential overlooking;
- Review the lantern roof and look at the option of a flat roof instead. Also not convinced of the darker tone; and
- Losing the four houses proposed at this end would enable a more effective use of the external space on the riverfront.

Officers comments:

- Change of use not supported;
- Increase in back garden depths is supported and are policy compliant however some still remain small;
- · The roof of Building F appears over-heavy and appears to emphasise the upper-storey finish;
- The scheme would benefit from further reducing the car parking at this end; and
- Playspace to be reviewed using the Mayor's Child Yield Matrix.

Key outcomes

The scheme addressed all of the comments raised above as part of the revised re-submission.

3.11 Planning objection comments - Feb-Sept 2019

During the consultation period of the previously submitted application (LPA ref 19/0646/FUL) a number of objections and comments were raised by members of the public. Design changes were subsequently made to address these objections. These include further explanation of some items and revisions to other elements to directly address the concerns raised.

Key feedback and outcomes

- A large majority of the comments raised once the application was submitted related to transport and parking and what restrictions would be on the CPZ. The developer confirmed the commitment to restrict residents to CPZ'd applications, which would be written into the title deeds.
- A number of comments questioned the density of the scheme. An analysis was undertaken to demonstrate that the proposals are in line with the neighbouring road densities of Hamilton Road and Norcutt Road.
- Height was raised as a concern by some residents through the objections. The tallest building is a modest five storeys towards the north of the site. This matches the approved student accommodation building less than 40 metres away. It is also similar in height to the apartment buildings on Langhorn Drive across the river. We understand residents are concerned about this height which is the reason for positioning the four and five storey building where it will have minimal impact on the surroundings, with no effect on sunlight to neighbouring properties, nor does any residential building look directly towards them.
- The architectural character of the development was raised as a possible concern, and challenged the team to ensure they are in keeping with the local
- Overlooking, privacy and daylight and sunlight were also raised as concerns. The scheme was amended to avoid overlooking from Building E and F based on these concerns. Elsewhere, opaque glazing is used to prevent overlooking from buildings in close proximity. The daylight and sunlight analysis shows a marked improvement to many of the surrounding properties.

A letter was submitted by the Environmental Agency objecting to the proposal in April

2019. In the letter, the EA object to the proposed development due to its impacts on nature conservation and Water Framework Directive Requirements. On 24th June, a letter was submitted by the applicant responding to the letter and providing additional information to the Environmental Agency. Following receipt of this letter, the EA withdrew their objection to the scheme.

Environment Agency & Friends of the River Crane - April/June

In addition to the EA letter, a letter from Friends of the River Crane (FORCE) was submitted objecting to the proposals.

The scheme was amended to respond to the following comments as follows:

- Increase the riparian habitat by providing additional greenery along the river edge, and opportunities for burrows and nesting within a low level wall and native hedgerow.
- Reduce the hard standing and parking provision adjacent to the river and further increase ecology and soft landscaping, ensuring the existing condition is greatly improved. Increase in permeable paving.
- Further analysis and design amendments to minimise lightspill towards the dark
- Enhanced playspace to increased the public realm playspace area, giving a total of 368 sq m and a further 165 sq m within communal terraces. This ensures the current proposal is policy compliant.

Summary of amendments following meeting with Richmond Council - 2019 and 2020

Various meetings were held with Richmond upon Thames Borough Council during the determination period to address issues relating to overlooking and privacy, PV panels, riverwalk playspace and affordable housing locations, mix and provision.

Key outcomes

2019

- Omission of balconies on Building F overlooking the Gould Road houses
- Increase in number of PV panels across the scheme
- Change of window arrangement on Building E to avoid overlooking to Alcott House
- Improvements to riverwalk planting and lighting design



Planning submitted scheme: Crane Road view



Planning addendum proposal Crane Road view



Illustrative plan - river walk

3.13 Summary of amendments through consultation for application 19/0646/FUL

Numerous consultation events and meetings took place with key stakeholders as part of the above application, which remain relevant for this new application. A summary of the changes made to the residential-led mixed-use scheme is set out below.

The changes respond to the consultation with near neighbours, Design Review Panel, Friends of the River Crane (FORCE), the Environmental Agency (EA), local councillors and London Borough of Richmond Upon Thames.

- Redesign of building backing onto Gould road houses to reduce the impact on neighbouring properties;
- Reduction in height of three storey 'saw tooth' roof building adjacent to apartment building;
- Review of size and number of windows overlooking gardens from apartment buildings;
- Retention of existing factory walls where on the red-line boundary to maintain existing condition for neighbours;
- Improvements to boundary wall condition by adding a trellis;
- Reduction in height of riverside buildings;
- Reduction in overall parking numbers and hard landscaping, lowering the risk of roadside runoff;
- Improvements to riverside area, biodiversity and pedestrian experience with enhanced play and additional landscaping and tree planting along river;
- Improvements to river edge guarding with low level wall and additional planting reducing light-spill towards the river and retention of dark corridor;
- Safe guarding of the future pedestrian bridge landing point;
- Changes to the massing and balcony design at the junction of Gould Road and Crane Road and removal of a communal roof terrace to mitigate overlooking;
- Amendment to Building F fourth floor roof form and cladding treatment to improve contextual relationship and reduce visual impact;
- Adjustment to house types, increase back garden sizes and relocation of two accessible houses into the apartments;
- Change to rear of houses to improve DLSL and outlook without introducing overlooking and reducing overshadowing through the year compared to the existing condition;
- Relocation of substation to standalone building and replacement with NSA;
- Amendments to window design to mitigate perceived overlooking;
- Amendments to lighting design to minimise impact on ecology and river corridor.
- Change to Use-class E two storey building, from three storey residential building
- Change to entrance design



Roof plan of planning submitted scheme highlighting changes

Revised scheme: Public exhibition - 19th March 2022 3.14

A public exhibition was held at Twickenham United Reformed Church on Saturday 19th March 2022. The boards showed both the residential led scheme and industrial led scheme. Members of the design team and client were present to discuss the proposals and answer any questions.

Local residents, stakeholders and interested parties attended in-person, responded online and by freepost. A total of 33 completed forms have been received to date. Notably, although 94% live in the area, the majority were new respondents who had not taken part in the previous application consultation. Key themes that were mentioned at the public exhibition and are addressed in the supporting planning documents include:

Photo 1 of consultation underway at Twickenham United Reformed Church



Photo 2 of consultation underway at Twickenham United Reformed Church

Land use

Overall, the residential scheme was preferred of the two proposals for redeveloping the site due to the need for housing, especially affordable housing, and lack of demand for industrial use in this area. Residents believed the residential-led scheme would enhance the neighbourhood. The affordable business premises proposed as part of the residential-led scheme was also supported as being appropriate for, and of benefit to, the local area. Industrial use in this residential location was strongly opposed by the majority of respondents.

Construction management

Feedback highlighted measures for mitigating construction impacts is important to the nearby residents.

Transport & access

Those who provided feedback consider the site unsuitable for lorries with concerns about safety for local residents, increased levels of pollution, damage to parked cars and the impact of more traffic on already congested narrow roads. These concerns largely related to the industrial-led scheme. A request for the CPZ restriction time to be extended was made in order to help mitigate the parking concerns.

Key outcomes

Following the event, copies of the boards were shared on the website, with Stephen Carter and Maria Seale, who offered to share via the local residents' WhatsApp group, and to the councillors present at the meeting on 11th March 2022.



















Boards presented at the public exhibition