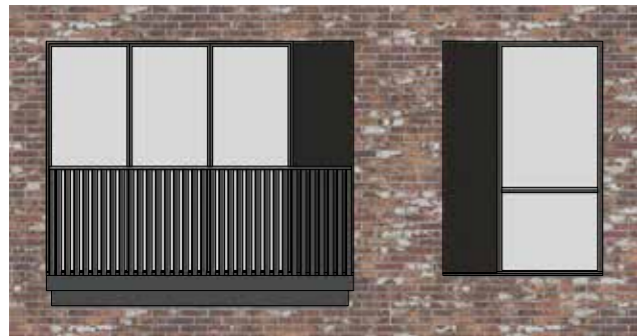


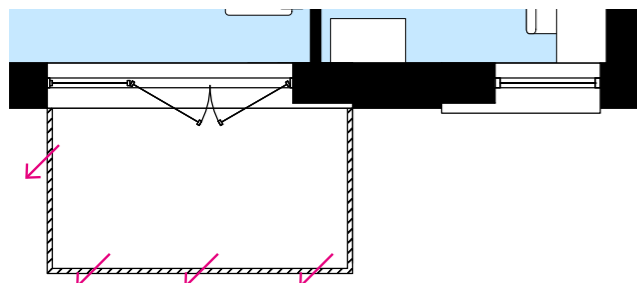
### Summary of post-submission elevation and massing amendments to Building F

Design changes made following DRP & pre-application include:

1. Top floor and roofscape – reduced angle and change of material;
2. Balcony design amended;
3. Massing reduced by lowering the top floor parapet and the communal roof terrace omitted.



Elevation of amended balcony



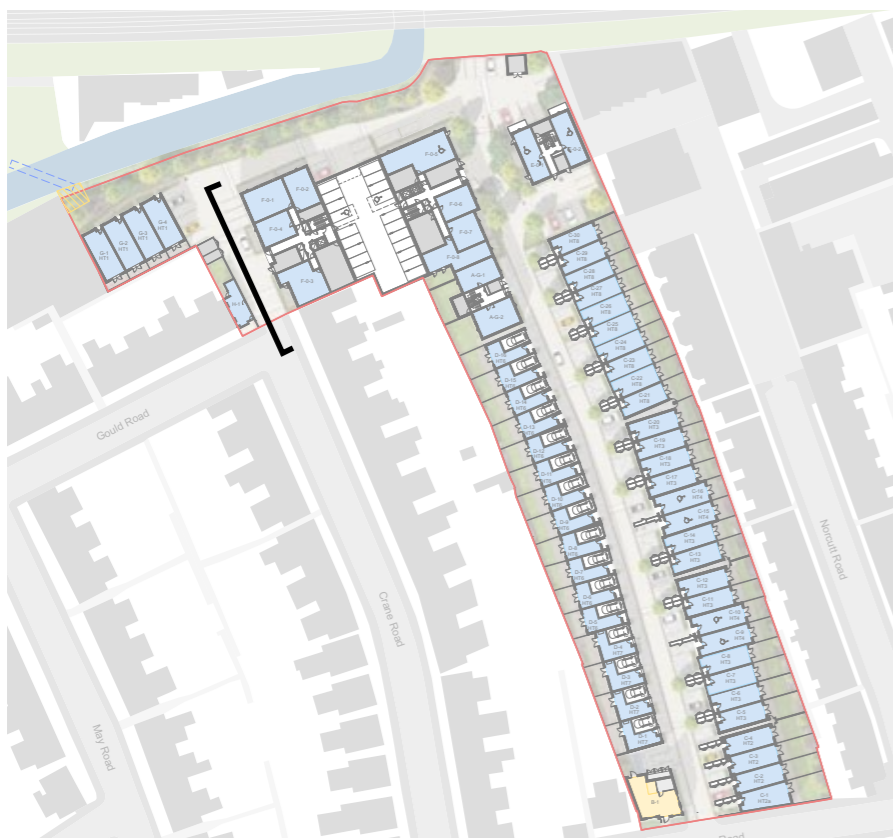
Plan view of amended balcony with directional arrows



Planning submitted elevation



Amended elevation



Key

Environment Agency & Friends of the River Crane comments

The following changes and clarifications were made to the scheme post-submission in response to comments from Environment Agency (EA) and Friends of the River Crane (FORCE).


Comments

Our response

**Riparian habitat (EA comment)**  
Loss of riparian semi-natural habitat within 8m of the River Crane.

**Riparian habitat (FORCE comment)**  
FORCE supports the concept of the riverside walkway in principle. The walkway should be clearly signed from adjacent streets as a public pathway, and it must remain fully and freely accessible to the general public at all times in order to register as a benefit to the wider community. Any proposal of this nature should also be entirely compatible with the developments proposed in the Lower River Crane Restoration Vision, and must in no circumstances be allowed to frustrate the Restoration Vision.

**Riparian habitat**  
Richard Graves Associates, appointed for ecology and biodiversity, have confirmed that there is negligible riparian semi-natural habitat affected by the proposals. The river stretch fronting the site is channelised with vertical piled sheet metal or concrete sides with limited terrestrial ruderal vegetation overhanging the wall such as bramble and buddleia offering limited potential water vole (*Arvicola amphibious*) burrowing habitat or kingfisher (*Alcedo atthis*) and sand martin (*Riparia riparia*) nesting habitat and the site having been subject to levels of noise disturbance and light trespass as a result of the former Greggs Bakery operation. The proposals now incorporate additional greenery along the river edge, and opportunities for burrows and nesting within a low level wall and native hedgerow.



Existing riverbank condition

**Impact on nature conservation and Water Framework Directive Requirements (EA comment)**  
The Thames River Basin Management Plan (RBMP) states that the water environment should be protected and enhanced to prevent deterioration and promote the recovery of water bodies. A natural corridor reduces roadside runoff into the watercourse and maintains water quality.

**Impact on nature conservation and Water Framework Directive Requirements (FORCE comments)**  
FORCE would expect the developer to provide permeable surfaces wherever feasible throughout the site, in particular in proposed car parking locations. We also expect the developer to provide for rain water recycling in its residential and commercial units.

**Impact on nature conservation and Water Framework Directive Requirements**  
It is acknowledged that hard surfaces adjacent to river corridors have the potential to cause a deterioration of water quality, however the proposed drainage strategy mitigates the risk and provides an improvement over the existing situation in line with the CIRCA SuDS Manual. The proposed hard standing and parking provision adjacent to the river also reduced during the design evolution further increasing ecology and soft landscaping ensuring the existing condition is greatly improved. The landscape plans to the right show these improvements. The use of permeable paving materials is proposed where feasible maximising SUDs measures.




Planning submitted landscape plan  
Revised planning landscape plan

**Lighting encroaching on the river corridor and channel (EA comment)**  
The scheme makes note of a sensitive lighting plan suitable for light sensitive species such as bats that are known in the area. We support the plan to use such lighting schemes however we feel the lighting is still encroaching on the river corridor and channel. Light-spill could be better prevented through the use of a natural corridor as a screen for the river.

**Lighting encroaching on the river corridor and channel (FORCE comment)**  
We are concerned the proposed development – in particular the five storey buildings facing the river – will increase light-spillage into the existing 'Dark Corridor' of the River Crane. Large accommodation buildings adjacent to the river will inevitably lead to extensive light pollution, having a detrimental impact on the environmental value of the river corridor.

**Lighting encroaching on the river corridor and channel**  
An Exterior Lighting Assessment Supplementary Report has been prepared by Desco, in consultation with the Project Ecologists. This sets out that illuminance from the proposed development do not significantly impact the river 'Dark Corridor'. The proposals also represent an improvement upon the existing conditions, where factory windows are directly on the river edge and factory noise would also have been present.

The proposals have been further enhanced by the introduction of a low level wall, railings, tree planting and hedgerow to the river edge, which will further protect the river corridor from light encroachment.



Lux level analysis from lighting report

**Overshadowing of the river corridor (FORCE comment)**  
Overshadowing of the river corridor – particularly given the development is directly to the south of the river and will cast a significant physical shadow into the corridor, reducing its environmental potential.

**Overshadowing of the river corridor**  
An analysis has been undertaken on the levels of overshadowing compared to the existing condition. This demonstrates that there will be less overshadowing of the river with the new proposal. This is due to the buildings being significantly set-back from the river edge when compared to the existing factory buildings, whilst large areas adjacent to the river are landscaped.



Existing 01:00pm  
Proposed 01:00pm

## 8.6 Planning objection comments

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. A number of 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.

Further consultation also took place with the local authority, local stakeholders and a Design Review Panel. This section runs through the feedback from these meetings and how the proposals were revised accordingly.

As outlined, the previous application was only refused on two grounds, with all other matters, including design, scale, massing, and parking considered acceptable.

Comment	Frequency		
Density of housing is too high	63	Enforcement of CPZ	10
Generate additional traffic	47	Extend CPZ hours	8
Inadequate on-site parking provision	46	Local schools are oversubscribed	8
Overlooking/loss of privacy	34	Insufficient sewage infrastructure to sustain development	6
Insufficient play/recreational space	24	Support principle of redeveloping the site for residential use	9
Overdevelopment	18	Increased pollution (air and noise)	5
Insufficient community benefits	17	Deliver footbridge over the River Crane	3
Highway safety	16	Impact on NHS facilities	3
Insufficient access to the River Crane corridor	14	Proposals should not exceed 3 to 4-storeys	3
Incongruent design (Houses)	10	Strictly access through Edwin Road	3
No provision of visitor parking	11		
Impact of construction traffic	11		

Summary of objections relating to previous application



### Comments

#### Parking & transport

A large majority of the comments raised related to transport and parking. This is often a common concern amongst residents and its importance is increased in this area due to a controlled parking zone (CPZ) being introduced. The specific issues raised included: *insufficient on-site parking provision and potential for overspill to neighbouring streets; why visitor parking hasn't been accommodated; and specifics on traffic calming measures being introduced.*

### Our response

#### Parking & transport

The proposals include restricting all new residents in the development from applying for a residents parking permit to ensure additional pressure is not added to the existing on-street parking provision. Visitor parking is not encouraged by either the Council's prevailing policies or the London Plan, especially at sites where there is good public transport and we have therefore decided not to provide additional parking spaces for visitors. Safety is paramount to the development and whilst no specific traffic calming measures have been introduced the design of the landscaping and reinstatement of footways will greatly improve the current condition. London Square Developments Ltd support the implementation of longer controlled parking periods to maintain adequate parking for local residents. Further details are included in the accompanying transport assessment.

#### Density

Some residents expressed concern that the scheme was too dense for the area and not in keeping with the urban grain of the surrounding streets.

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150-200 hr/ha	150-250 hr/ha	200-350 hr/ha
3.8-4.6 hr/unit	35-55 u/ha	35-65 u/ha	45-90 u/ha
3.1-3.7 hr/unit	40-85 u/ha	40-80 u/ha	55-115 u/ha
2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha
Urban	150-250 hr/ha	200-450 hr/ha	200-750 hr/ha
3.8-4.6 hr/unit	35-85 u/ha	45-120 u/ha	45-185 u/ha
3.1-3.7 hr/unit	40-80 u/ha	55-145 u/ha	55-225 u/ha
2.7-3.0 hr/unit	50-85 u/ha	70-170 u/ha	70-300 u/ha
Central	150-300 hr/ha	300-650 hr/ha	650-1100 hr/ha
3.8-4.6 hr/unit	35-80 u/ha	65-170 u/ha	140-290 u/ha
3.1-3.7 hr/unit	40-100 u/ha	80-210 u/ha	175-355 u/ha
2.7-3.0 hr/unit	50-110 u/ha	100-240 u/ha	215-405 u/ha

2016 Current London Plan Density Matrix, highlighting where our development falls (In the draft London Plan Density Matrix has been omitted)

#### Density

We have undertaken the following analysis of our density compared with neighbouring streets in the surrounding area which indicates that the scheme is in line with the local context and achieves similar densities. Additionally the footprint of the proposals fits comfortably with the urban grain and pattern of the street scape.

Planning Submission Proposal Density Study: **362 hab. rooms / hectare, 103 units / hectare.**

Norcutt Road Density Study: **440 hab. rooms / hectare, 103 units / hectare, including approved student building.**

Hamilton Road Density Study: **396 hab. rooms / hectare, 99 units / hectare.**

In line with the London Plan and the current need for housing, the design team has worked hard to maximise the sites potential in a highly residential area, on a brownfield site, whilst being sensitive to neighbouring properties and the character of the local area. The proposed density was supported by officers for the previous application and is therefore unchanged.



Plan illustrating surrounding densities

Comments

Height

A number of comments expressed concern that the scheme was incongruent with the area in terms of height and character. They expressed that proposals should not exceed four storeys.



Our response

Height

The height of the proposals has been an important consideration of the design and has evolved over the design process. This included:

- Complete redesign of the building backing the Gould Road houses, from a two storey apartment building with roof, to single storey two bedroom houses with a bedroom within the roof space;
- The three storey apartment building (Building A) adjacent to the northern end of Crane Road had the roof profile removed from the side closest to the boundary, reducing its height;
- The tallest apartment building (Building F) was reduced from six storeys to five storeys matching the number of floors proposed on the approved affordable residential building adjacent (19/2789/FUL).

The tallest building is a modest five storeys towards the north of the site. This matches the approved affordable residential building less than 40 meters 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 why the four and five storey building have been positioned 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 external material of the four storey element was revised and the roof pitch and parapet heights reduced to minimise its impact on the surrounding streets. This is shown on the images to the right.



Planning submitted proposal



Planning addendum proposal

Character

Some of the comments raised related to the character of the proposals and questioned whether they are in keeping with the area.



Planning submitted material proposal



Character

Careful analysis was undertaken on the surrounding residential streets to ensure that the character of the proposals are complementary and of a consistent architectural language. So that the site is not treated as one single development, which could have become overbearing, the design is split into three character areas. This helps increase variety and allows the development to respond to the changing context at opposite ends of the site.

Whilst the design is split into three character areas, all of the scheme incorporates design elements and façade treatments that are inspired by the local area. The selected materials of brick, metal and stone are robust, natural and hard wearing, fit comfortably within the existing context and will provide the proposal with character whilst also giving the impression the development has emerged over time.

The proposed design was welcomed by officers, with paragraph 7.65 and 7.66 of the committee report for the previous application stating: 'The proposal also has the support of the Council's Urban Design team and, on balance, this element is considered to comply with Policy LP2.' 'It is considered that the 'mews' design is appropriate and relates to the scale and grain of the local area, and this is in line with the Twickenham Village Plan guidance.'



Revised proposal

Comments

Our response

**Overlooking & privacy**

A number of comments submitted related to overlooking of gardens or rooms from the proposals.



**Overlooking & privacy**

Privacy and overlooking has been a key consideration throughout the design process. The scheme is in a residential area with a number of residential houses in close proximity. Notwithstanding this, it is noted that the existing buildings occupy the full width of the site and therefore are closer to neighbouring houses than the proposed buildings.

The scheme has been designed to minimise overlooking through measures such as opaque glazing, reduced opening windows and defensible planting at boundary and roof edges. Where direct overlooking is possible the buildings have been located more than 20m from the neighbours.

This means that there are no windows, roof terraces or balconies in the scheme where overlooking of other residential properties would be possible within the 20 meter distance.



Plan illustrating overlooking distances and mitigation strategies

**Daylight & sunlight**

A number of residents have expressed concerns that the proposals will reduce the amount of daylight and sunlight received to their properties and gardens



**Daylight & sunlight**

A daylight sunlight analysis has been undertaken and a report will accompany the planning application. This report demonstrates there are a number of significant improvements to the daylight and sunlight benefiting many of the surrounding houses due to the proposed heights and separation distances compared to current buildings.



**Playspace**

Some comments received voiced concerns regarding the amount of playspace being provided on the site.

Friends of the River Crane (FORCE) rejects the assertion that: "there is sufficient play space for 5+ year olds in the surrounding area. It is therefore proposed that play space for 5-12+ year olds will be accommodated within the Parks and Greens listed below" (Refused scheme DAS, p98).

FORCE seeks greater provision of community space on the site, even at the expense of a reduction in the number of housing units built, in order to ensure that the site is more self-sufficient in terms of its impact on adjacent open spaces.



**Playspace**

Using the latest GLA occupant yield and play space calculator the predicted child yield for the site is 52 children (based on the addendum area schedule). The proposal is for ages 11 and above to be accommodated off-site in larger play areas more suitable. A contribution via Section 106 will be made by the developer to facilitate this. Removing the 11+ children, results in a play space requirement of 400 sq m.

All houses of 3-bed or more are provided with a garden reducing the policy requirement for 0-4 playspace to circa 100 sq m under Richmond SPD guidance. Despite this the amended proposals have 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.



8.7 Summary of amendments following meeting with Richmond Council

Our response


**Overlooking & privacy**  
 A number of comments submitted related to overlooking of gardens or rooms from the proposals.



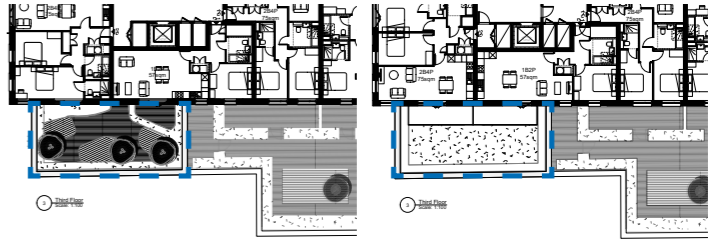
**Overlooking & privacy**

To mitigate overlooking south east towards Alcott House rooms and gardens from Building E oriel windows were introduced. The adjacent plans demonstrate the overlooking arc of oriel windows angled 30 degrees away from Alcott House. The overlooking arc does not reach Alcott House from any window.

To mitigate overlooking south towards Crane Road houses rooms and gardens the roof terrace was re-designed as an intensive green roof with the minimum external provision for the apartments fronting the roof terrace and no access for other residents.



Proposed revision to Building G model    Proposed revision to Building G plan




Planning submitted landscape proposal    Proposed revision

**PV panels**  
 There was concern whether the amount of pv panels proposed would be sufficient.



**PV panels**

Increased PV provision with 200 PV panels across the scheme and all feasible roofs utilised.



Proposed revision roof plan identifying pv panel locations

**Riverwalk**  
 Planning objections were raised with regards to the impact of the proposal on wildlife along the River Crane and the amount of likely illumination the development would cause to the 'Dark Corridor' of the river.

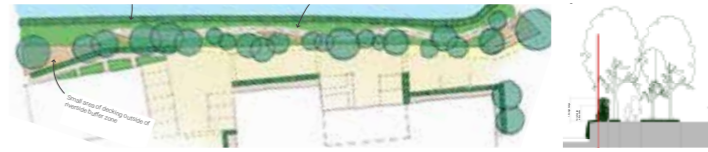



**Riverwalk**

Further changes to the landscape and lighting design along the riverfront restrict the amount of light-spill reaching the sensitive area so as to have the absolute minimum impact on wildlife. The lighting will be designed in line with the Exterior Lighting Assessment by Desco.

The introduction of a 5m buffer zone heavily planted with native and wildlife friendly planting, natural pathway and play elements; a 1.2m wide pathway will consist of self binding gravel (Breedon / Hoggin or similar acceptable materials); and a 1.5m high hedge with 600mm tall woven willow trellis to the southern face which will prevent light-spill onto the river.

All vehicular routes, building footprints and hard-landscaping are outside of the 5m buffer zone.

Planning submitted landscape proposal    Proposed revision

### 8.8 River crossings

In response to comments made at the public consultation we have looked at the possibility of facilitating a new pedestrian crossing over the River Crane as part of the design process.

The map identifies existing crossing points and the time it takes to get to key destinations. As identified, there are two crossing points within 6 minutes walk.

**Key**

- Public land presenting opportunity for potential bridge over river to enhance connectivity
- Private land restricting opportunity for potential bridge
- Twickenham station
- Existing pedestrian route from site
- Popular locations within walking distance
- Existing pedestrian bridges over river
- x mins walk Existing time from site
- Starting point



Existing routes and bridges

Due to the presence of the river and railway, providing a new pedestrian bridge is not a straight forward proposal. This is further complicated by the private land owned by Twickenham Rifle and Pistol Club and Mereway Cottage.

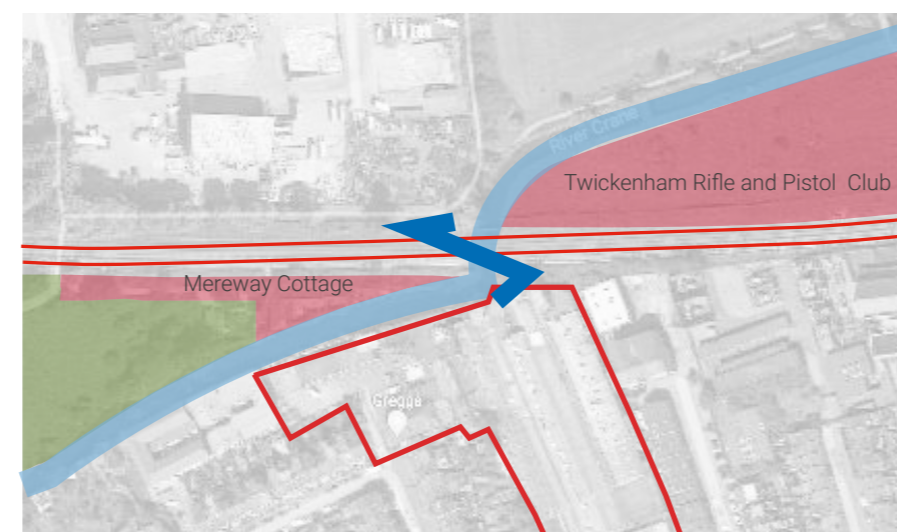
To the right is a brief analysis of possible bridge locations.

There are two main options:

Option 1 would require a bridge to go over both the railway line and river. This would require the bridge to go up a significant height and traverse a long distance. It would also need to be approved by Network Rail.

Option 2 requires a diagonal span to the Mereway Nature Park. This is dependent on ground conditions to the west and is likely to have a negative effect on the biodiversity of the nature park.

It is considered option 2 is the only feasible option for a future bridge.



Option 1 - Bridge location over the river and railway

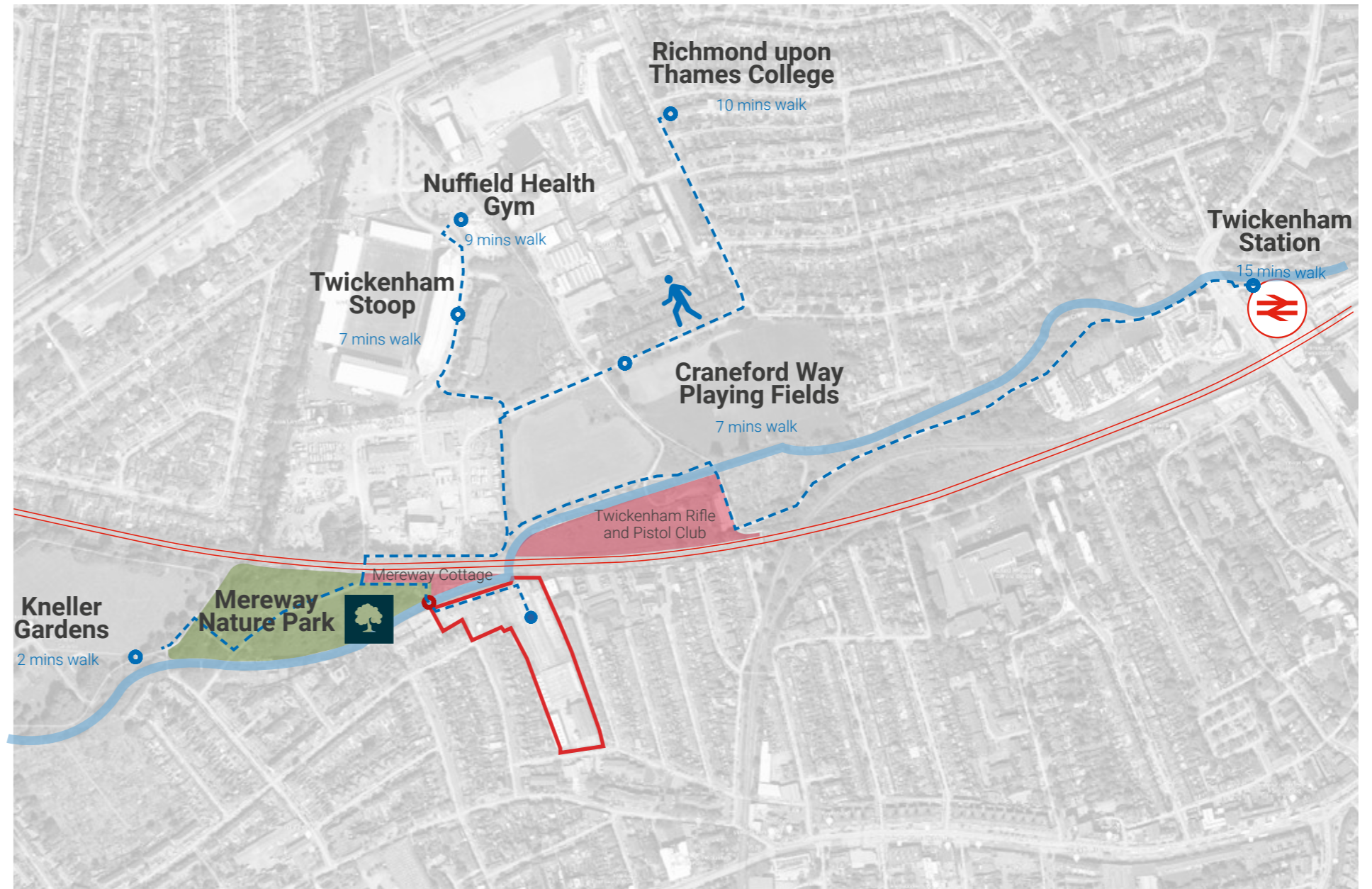


Option 2 - Bridge location and new path through Mereway Nature Park

This diagram shows the decrease in walking time if a pedestrian bridge was to be provided from the site in the future.

Key

- Public land presenting opportunity for potential bridge over river to enhance connectivity
- Private land restricting opportunity for potential bridge
- Twickenham station
- Potential pedestrian route from site
- Popular locations within walking distance
- Potential bridge location
- x mins walk Time from site via potential new bridge
- Starting point



Possible new routes with bridge option 2







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