

Comments

Land use

- The policy position to protect employment was noted
- The councillor was interested to see if a small commercial unit might be feasible
- It was noted that neighbouring Crane Mews struggled to fill commercial space and is connected to residential



Land use

- Following this meeting a study was carried out to introduce commercial space at the Edwin Road entrance
- This was designed specifically for small start-ups and local businesses
- A comprehensive study of the local demand for commercial developments has been included in support of the application

Affordable housing

- The councillors were pleased that family houses were being offered and they were interested to see a possible partnership with housing association
- Pleased the proposal is offering family sized units



Affordable housing

- Affordable family housing will be maximised subject to viability

Roads / Access / Traffic

- Improving local roads would be welcomed
- It was agreed that pillars at Edwin Road give the impression of a gated community and possible road closure - wanted this amended
- It was agreed that HGV traffic was inappropriate and should not be reintroduced



Roads / Access / Traffic

- Edwin Road entrance revisited and pillars have been reduced in scale



CGI of Edwin Road entrance



Revised CGI of Edwin Road entrance

Bridge / River access/ Ecology

- Integration with Wetland / green space around the river
- Support for a bridge to link the site



Bridge / River access

- Following an analysis of the journey times and the possible landing points for a pedestrian bridge we do not believe a pedestrian bridge would be a useful addition in this location. However space has been safeguarded on the site for a possible bridge link to be incorporated in the future
- A number of improvements are proposed to enhance biodiversity within the site and along the river edge. We are working in collaboration with Friends of the River Crane to ensure our proposals marry into larger plans for the riverside area

8.5 Secured by Design

A Secured by Design meeting was held on Monday 4th February at Assael Architecture with Ray Goodlett and Chris Morton from Richmond upon Thames Metropolitan Police.

The design was reviewed and key issues were highlighted by the SBD officers. A summary of the discussion and outcomes is outlined below.

The scheme has been designed in the spirit of the SBD guidance and is in a position for ADQ silver to be achievable. The scheme has two defined points of access and is therefore not porous. However, a number of points were discussed chiefly purporting to security, SBD rated hardware, and access:

Security:

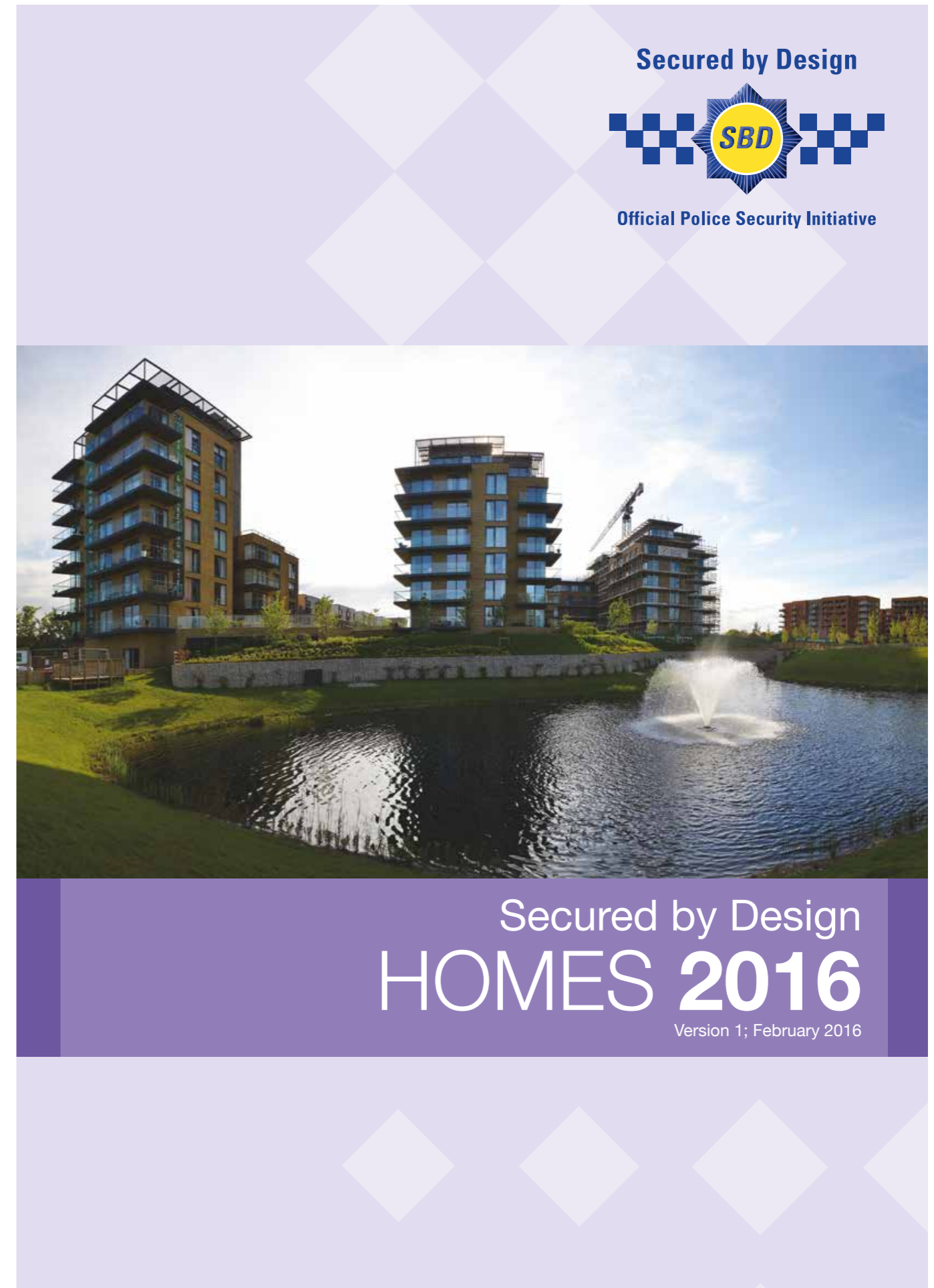
- There needs to be sufficient lighting towards the riverside to prevent loitering;
- Trees are to have high canopies along mews street. Tree species to be specified by the Landscape architect;
- Play space will need to be in line with SBD guidance and SBD rated;
- Garden walls to be 1.8 minimum with an additional trellis for extra height should it be required in the future;
- Add a channel for future provision of powered gate at entrance.

SBD hardware:

- External bin & 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 with closing detail tbc pending a detail drawing - LPS 1175 SR2 equal or approved;
- Dual pole break glass/mushroom buttons to be specified;
- SBD rated post box units.

Access:

- Apartment hallways should have airlock spaces at building entry points;
- Postal approach is tbc – trade-off between multi post box mounted in external wall or hallway. Check with Royal Mail for preference;
- Fob-in fob-out methodology for car park door to deter tailgaters



Richmond Design Review Panel

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;
- Losing the four houses proposed at this end would enable a more effective use of the external space on the riverfront.



View of east terraced houses



View of west terraced houses



Riverside CGI



Riverside elevation

Comments

Riverside, playspace and Gould Road houses (DRP comment)

Supportive of the clear public realm concept, however the location of car parking at the north end of the site and overall quantum could be reduced to improve the landscaping and river edge. Little space is left for seating, play and recreation. Consider mitigation measures to soften the hard edge towards the river-front and create a sense of place by the river edge.

The space for the bridge landing feels compromised with car parking and playspace. Suggest taking forward the opportunity for a pedestrian crossing over the River Crane and the railway and interrogate this space to ensure sufficient landing area. Losing the four houses may help assist in improving this.



Our response

Riverside, playspace and Gould Road houses

Accommodating sufficient parking and appropriate landscaping has been a careful balance. Following advice from our transport consultant parking was reduced marginally to enhance the landscaping with further measures as follows:

- Greatly enhanced river edge treatment with extension of board walk and play space;
- Reduced no. car parking spaces considered acceptable by Richmond's Highways team;
- Detailed design of playspace and bridge landing showing how these interact and ensuring the space is sufficient;
- Future-proofed bridge landing with additional safe guarded area added to drawings;
- 100 metre board walk runs the full length of the river providing further opportunities for interaction and play;
- Increased planting buffer improves biodiversity and reduces light-spill onto the river corridor;
- Spaces for seating, play and walking provided;
- Clear delineation between car and pedestrian spaces;
- Four houses proposed to the rear of Gould Road houses to be retained as previously submitted. These houses have been designed to fit comfortably in front of the playspace, provide natural surveillance enhancing the security of the riverside area and avoid overlooking to neighbours. Their height has also reduced during the design process.



Planning submitted landscape proposal



Planning addendum landscape proposal



Planning submitted through Gould Road houses section

Rear garden sizes (DRP comment)

Lack of amenity space for houses (specifically C15-C30 and D1-D7). Adjust the typology and provide more generous space. Explore the inside outside relationship to make them more usable.

Rear garden sizes (pre-application 2 comment)

Increase in back garden depths is supported and are policy compliant however some still remain small.



Rear garden sizes

All houses have been provided with a rear private garden which meets the London Plan and policy requirements, however garden sizes have been increased where possible. These measures include:

- House types C-15 to C30 shortened to increase garden sizes (houses remain London Plan compliant);
- Larger accessible houses with the smallest gardens relocated elsewhere and provided as apartments more suitable for wheelchair users;
- Patio doors to be provided with level threshold giving seamless access to the gardens, creating usable inside-outside space;
- House layouts D1-D4 amended to improve relationship with the garden.



Planning submitted proposal

Planning addendum proposal

Massing improvements – Gould Road & Crane Road (DRP comment)

- Concerns over the massing at the junction of Gould Road and Crane Road in relation to existing terraces and overlooking from the roof gardens in Building F;
- Review the lantern roof and look at the option of a flat roof instead; not convinced of the darker tone.

Massing improvements – Gould Road & Crane Road (pre-application 2 comment)

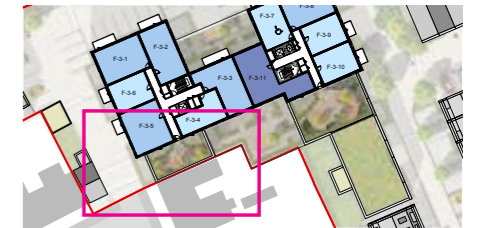
- The roof of Building F appears over-heavy and appears to emphasise the upper-storey finish.



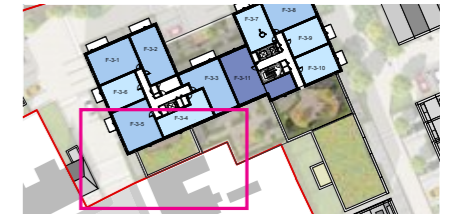
Massing improvements – Gould Road & Crane Road

We have tested a variety of approaches in response to these comments. The flat roof option was tested but this gave a very blocky form that is largely alien to the area and did not compliment the existing roofscape. The following design amendments were subsequently made:

- Reduced parapet and roof terrace extent at junction of Gould Road and Crane Road, improving the relationship with the existing terrace of houses and reducing potential overlooking from the roof terrace;
- Amended treatment of fourth floor and roof profile to reduce visual impact from the street;
- Different material to reduce 'heavy' appearance;
- Retained lantern profile and roof pitch within a gable to best respond to existing buildings on site and local character.



Planning submitted scheme showing roof terrace



Potential scheme showing residential terrace area



Planning submitted scheme: looking north down Crane Road



Planning addendum proposal



Planning submitted scheme: looking north down Crane Road



Planning addendum proposal

Overlooking & privacy

Fourth storey and balconies to the western end of Building F could have a negative impact and potential overlooking.

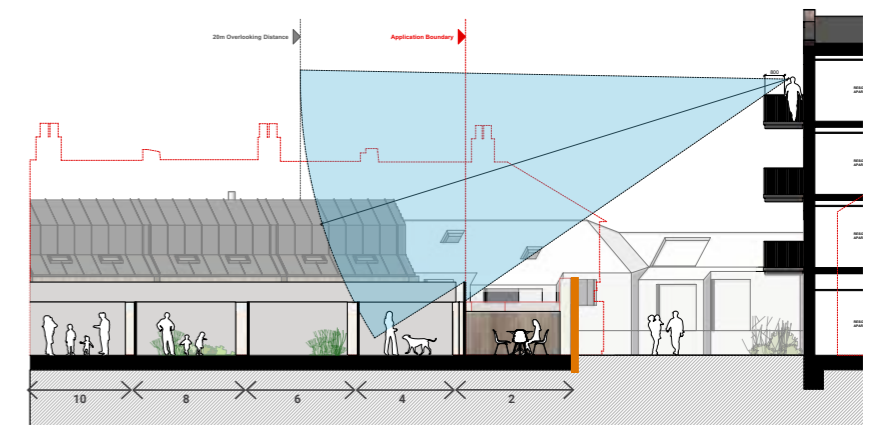


Overlooking & privacy

A full review of overlooking has been undertaken on these properties. The current proposal does not overlook existing windows, but does partially overlook the gardens of 4 Gould Road. Overlooking of gardens is a common condition within the area and within London and was considered acceptable by officers as part of the previous application. It is also important new apartments are provided with balconies where possible to meet London Plan.

However the design incorporates the following changes to reduce this perceived overlooking to benefit the existing owners of the gardens.

- Overlooking to neighbouring gardens minimised by garden of number 2 Gould Road and proposal to increase height of existing perimeter wall at site application boundary;
- Balcony railings amended to blades directing views towards the river providing residents with additional privacy and reducing overlooking from those sitting on the balcony or within the rooms.

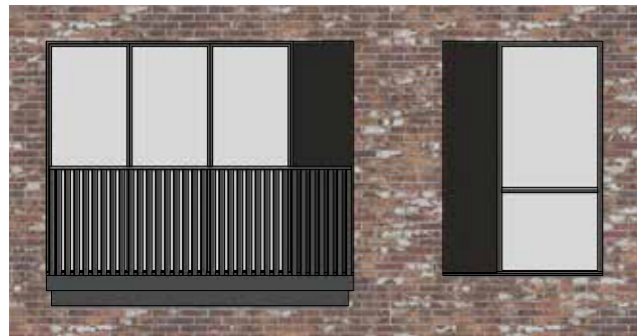


Section showing visibility splay from balconies

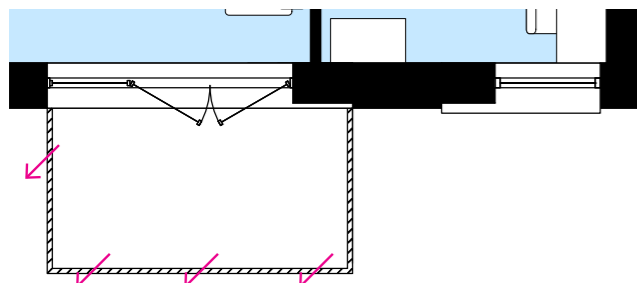
Summary of post-submission elevation and massing amendments to Building F

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



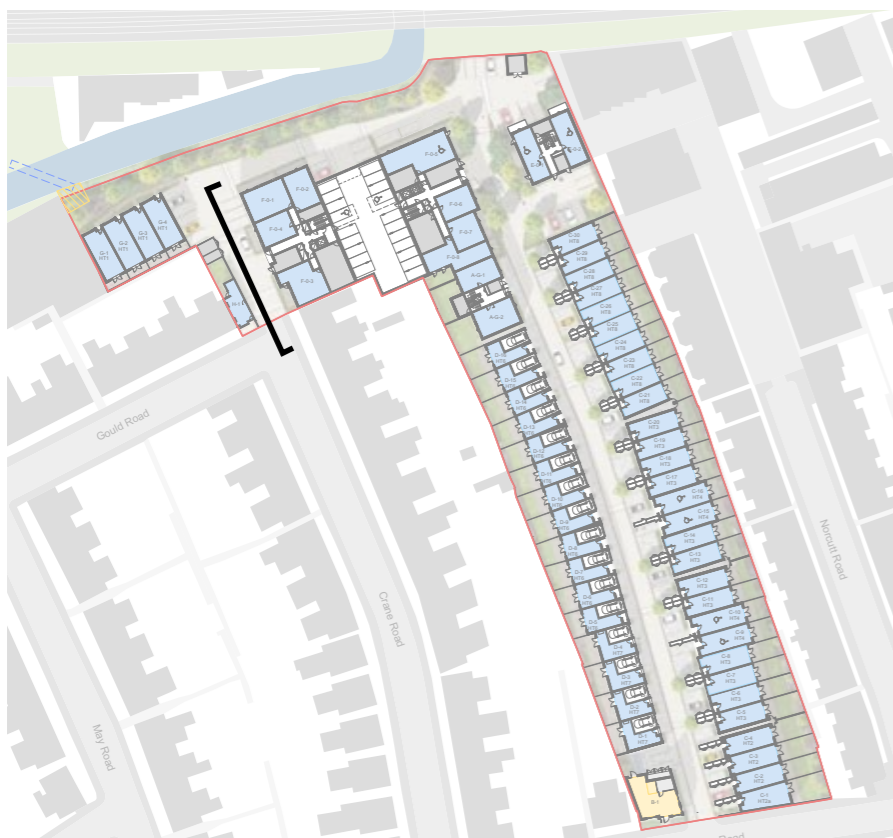
Plan view of amended balcony with directional arrows



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.

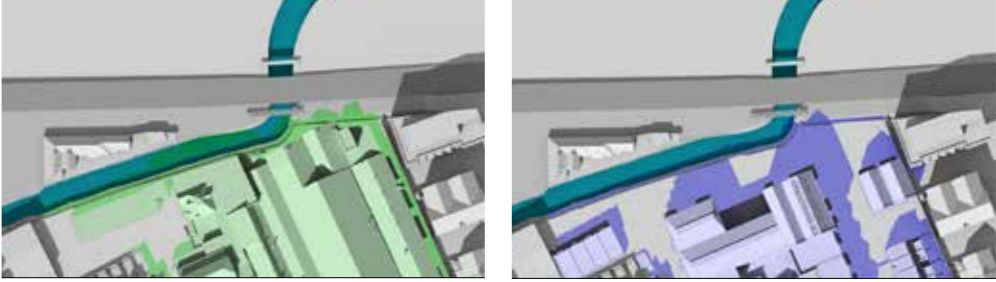
The proposals have been further enhanced by the introduction of a low level wall, railings, tree planting and hedgerow to the river edge, which will further protect the river corridor from light encroachment.



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

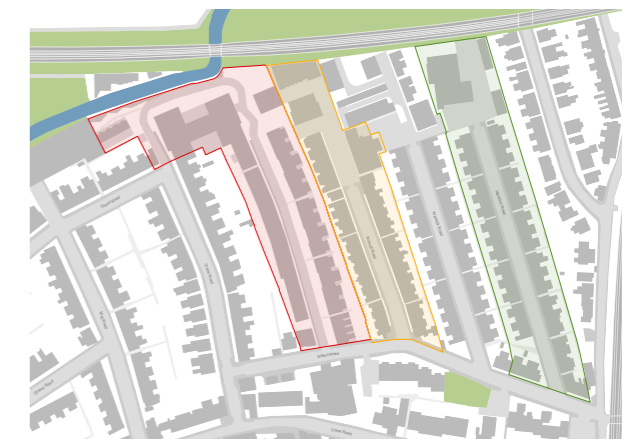
We have undertaken the following analysis of our density compared with neighbouring streets in the surrounding area which indicates that the scheme is in line with the local context and achieves similar densities. Additionally the footprint of the proposals fits comfortably with the urban grain and pattern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