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**Manor Road / Richmond**  
Townscape & Visual Impact Appraisal



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SEPTEMBER 2023  
Arc Ref: A209-RE05-V4

Prepared for  
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	<b>Contents</b>
1. Introduction	5
2. Regulation 19 Local Plan Policy	5
3. Appraisal of Effects of the Amended Proposed Development	6
4. Summary and Conclusions	15



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ANYTIME  
IN THIS ZONE  
EXCEPT FOR  
LOADING AND UNLOADING  
OF GOODS

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## 1. Introduction

1.1 This addendum has been prepared to update the previously prepared Townscape and Visual Impact Appraisal (TVIA) of predicted effects of the proposed development (hereafter referred to as the 'Scheme Proposals') on the site at Manor Road, North Sheen, Richmond which was originally submitted for planning approval to the London Borough of Richmond upon Thames (LBRuT) in 2019 (application reference 19/0510/FUL).

1.2 The addendum has been updated to reflect the revised scheme proposals that have been developed following the anticipated requirements relating to fire safety resulting in the introduction of an additional staircase. Section 3 sets out the detail of the changes, however in summary this change results in the a limited change to the overall dimensions of the buildings.

1.3 This report also reflects the updates made previously and reported in V3 of this addendum, (issued in May 2023) which addressed representations received from LBRuT regarding the effects of roof top plant as introduced below and described further in Section 3. In addition in light of the anticipated publication of the Council's 'Regulation 19' Local Plan consultation this addendum also considers relevant policies relating to views and building heights which is set out in Section 2.

1.4 LBRuT, in their representations of December 2021 and July 2022, raised queries as to the visual impact of the roof level plant enclosures. Whilst it is considered that the plant as minimal impact upon views, this addendum considers the full visual impact of the roof top plant upon a number of local views.

1.5 This addendum has been prepared in light of the most recent scheme proposals including a redesign of the roof top plant and lift overruns to account for technical variations to MEP requirements and lift overruns. The compound containing the roof top plant has been accurately modelled and is included on a number of the representative views previously assessed. The scheme amendments resulting from additional staircases are incorporated as are changes to parapet levels which include changes following consultation with LBRuT and which are described in section 3. The locations of the views are shown in Figure 1.1.

1.6 This addendum should be read in conjunction with the original TVIA (ref A209-RE-01); the addendum submitted in May 2019 (ref A209-RE-02) and the subsequent addenda submitted in September 2019 (ref A209-RE-03) and July 2020 (ref A209-RE-04).

## 2. Regulation 19 Local Plan Policy

2.1 It is understood that LBRuT will be consulting on the next draft of their Local Plan (referred to as Regulation 19) in early June 2023. Two policies have been identified as specifically relevant to the TVIA, namely Policy 31- Views and Vistas and Policy 45- Tall and Mid-Rise Building Zones.

2.2 Policy 31 identifies 31 additional views and vistas that were consulted upon in a draft Local Views SPD and are intended to be designated through the adoption of the Local Plan. These will be in addition to the existing views and vistas identified on the Policies Map. Both the existing and new views and vistas are described in LBRuT's Consultation Draft Local Views SPD.

2.3 The intention of Policy 31 is to protect the quality of the identified views and visits and in particular "require development to avoid harm to the quality of the views and vistas as identified on the Policies Map, and for any proposal affecting a designated/identified view/vista on the Policies Map demonstrate this through the submission of such through computer generated imagery (CGI) and visual impact assessments as required by Policy 44 Design process."

2.4 The original TVIA (ref A209-RE01) prepared in 2019 had due regard to policy, current at that time, relating to views and vistas and at para 3.33 confirmed that none of the views identified in policy were effected.

2.5 In light of the additional 31 views identified in the emerging policy, these have been reviewed alongside the scheme proposals and previous TVIA (and addenda) and it is not considered that any of the additional views or vistas will be effected by the proposed development.

2.6 Policy 45 defines 'tall buildings' as those which are 7 storeys or over, or 21meters or more form the ground level to top the building and 'mid-rise buildings' as those below the threshold for tall buildings but over 5 storeys or 15m above ground level. The policy goes on to state that tall and mid-rise buildings 'will only be appropriate' in their respective 'Tall Building Zone' or 'Mid-Rise Building Zone'.

2.7 Policy 45 then lists criteria that need consideration in addressing Visual Impact, Spatial Hierarchy and Fire Safety. Notwithstanding that the scheme proposals include a tall building within a mid-rise zone, all criteria listed under the visual impacts section have been considered as set out within the documents, including the TVIA, submitted with the application.

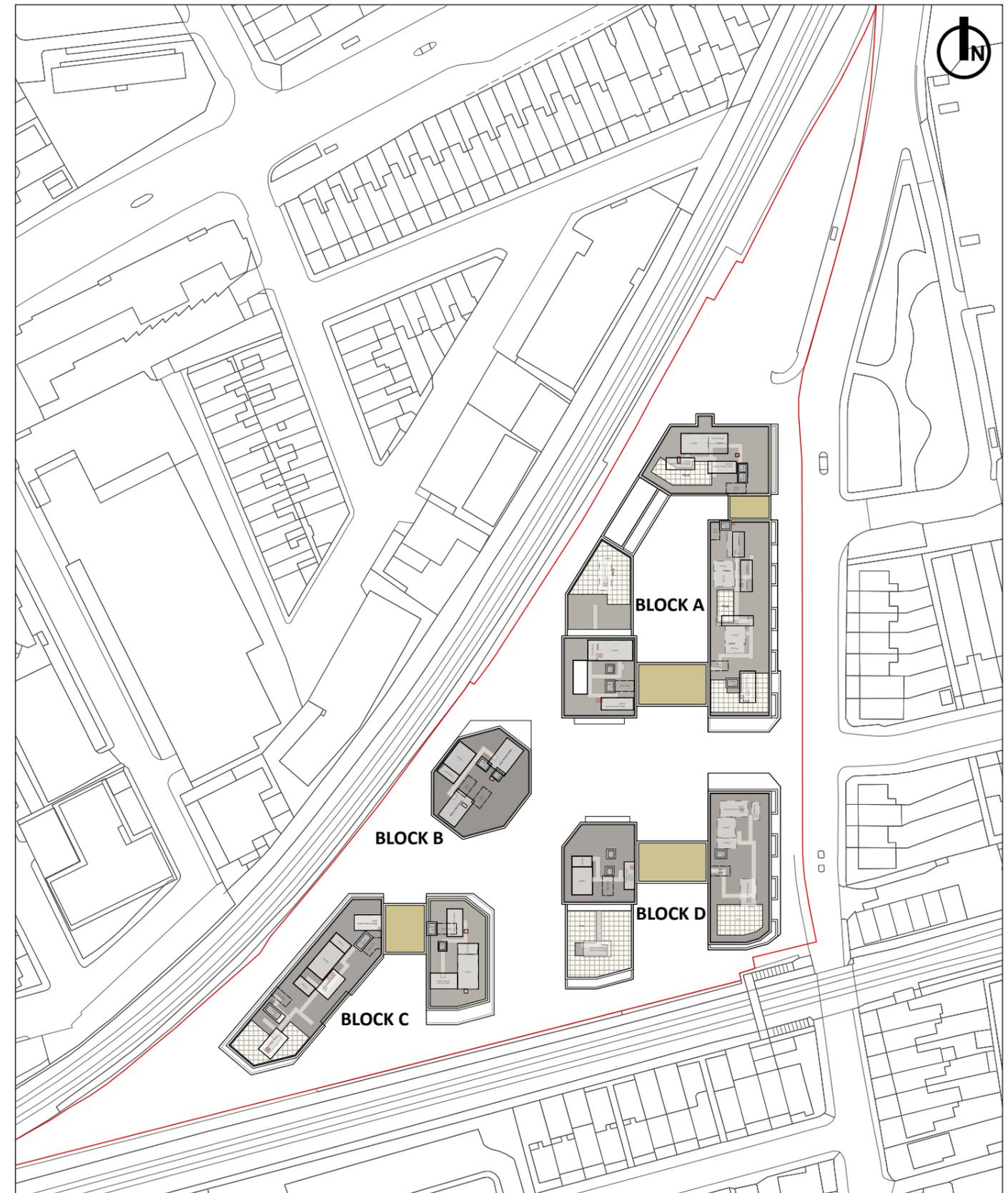


Figure 1 - Block plan (Showing roof plant) Assael Architecture

### 3. Appraisal of Effects of the Updated Development Proposals

#### Introduction

3.1 This section considers how the updated Development Proposals, which includes the amendments resulting from anticipated changes to fire safety regulations, the addition of plant to the roofs as illustrated on the Assael Roof Plan in Figure 1 (and on the AVRs below) and other amendments will affect the receptors identified in the original baseline study.

3.2 Following a description of changes to the scheme proposals, the anticipated effects relating to the Site and the wider townscape character are described following which the effects on the visual receptors are considered.

3.3 In respect of changes introduced in respect of fire safety the following is noted.

3.4 Following the Government’s announcement in July 2023 confirming the intention to mandate second staircases in new residential buildings above 18 metres, the proposals have been revised to ensure all buildings above 18 metres meet these standards and present the highest standard of fire safety. This has been accommodated through internal changes, including improving the efficiencies of circulation space and reductions in unit sizes, and minor external changes, including marginal increases in building footprint. The full extent of the changes are set out in the accompanying DAS Addendum, but are summarised as follows:

- Block A, Core A: a 450mm (or 45cm) extension in footprint to the south;
- Block A, Core AD: a 225mm (or 22.5cm) extension in footprint to the south;
- Block B: a 112.5mm (or 11.25cm) extension in footprint to the south and a 112.5mm (or 11.25cm) extension to the north;
- Block C, Core A: a 225mm (or 22.5cm) extension in footprint to the north and north-east and a 112.5mm (or 11.25cm) extension to the east;
- Block C, Core C: an infill of the recessed part of the façade to the south-east;
- Block D, Core B: a 225mm (or 22.5cm) extension to the north and north-west.

3.5 The extensions in footprint have been accommodated to façades facing into the central landscaped area of the Site. There are no extensions in footprint proposed to the façades facing the site boundaries and, as

such, there are no reductions in the distance of the proposed buildings to neighbouring residential receptors.

3.6 The footprint extensions have led to minor changes to the elevations of the affected blocks. The total floorspace of the proposed development has increased by 2,037.2 sqm (GIA). The number of homes and mix of unit types remains unchanged.

3.7 In respect of the roof plant the following is noted. As a result of considering the detailed servicing of the proposed development the location and design of plant and other features including lift over runs and photovoltaic panels, to the roof tops has been developed and therefore in order to further illustrate the effects, a series of updated representative views are included for 6 views.

3.8 Since the original submission in 2020, other design development has occurred and the 6 representative AVRs illustrated include some changes to the parapet heights. In order to summarise the change that has occurred since 2020 Assael have provided the following commentary.

3.9 **Building A1** +650 increase in parapet height. This is due to raise of ground floor level for flood levels from 6.300 to 6.450 AOD, to minimise increase of height, floor to floor heights of residential floors each reduced by 7.5cm and rationalising of the parapet detailing at stage 4 for a consistent detail across the scheme.

3.10 **Building A2** +200 increase in parapet height. This is due to raise of ground floor level for flood levels from 6.300 to 6.600 AOD and to minimise increase of height, floor to floor heights of residential floors each reduced by 7.5cm

3.11 **Building A3** No change in height, increase of ground floor level from 6.300 to 6.600 AOD has been accounted for by floor to floor heights of residential floors each reduced by 7.5cm.

3.12 Overall maximum parapet heights for the group of A block buildings remain the same as the original application (+35.15)

3.13 **Building B** -125 mm parapet height. Change is of ground floor level for flood levels from 6.300 to 6.450 AOD and floor to floor heights of residential floors each reduced by 7.5cm to minimise overall increase of height.

**Table 3.1 – Townscape Character Appraisal of Effects** (unchanged from July 2020 - A209-RE04)

Townscape Character Area	Value	Susceptibility to change	Sensitivity	Magnitude of change	Effect
TCA 1 North Sheen Mixed Use	Medium to low	Low	Low	High	<i>Moderate / Beneficial</i>
TCA 2 Manor Grove Residential	Medium	Medium to Low	Medium to Low	Low	<i>Minor / Neutral</i>
TCA 3 North Sheen Residential	Medium to low	Medium to Low	Medium to Low	Low to Negligible	<i>Minor to Negligible / Neutral</i>
TCA 4 East Sheen Open Space	High to medium	High	High	Negligible to None	<i>Negligible / Neutral</i>
TCA 5 Richmond Hill and East Sheen Residential	High	High	High	Negligible to None	<i>Negligible / Neutral to None</i>
TCA 6 Richmond Residential Fringe	High	High to Medium	High	Negligible	<i>Minor / Neutral</i>
TCA 7 Kew Gardens and Old Deer Park	Exceptional	High	High	Negligible to None	<i>Negligible / Neutral to None</i>
TCA 8 Kew Gardens Residential Fringe	Exceptional to high	High	High	Negligible to None	<i>Negligible / Neutral to None</i>

3.14 **Building C1** -400 mm parapet height. Ground floor level reduced from 6.975 to 6.450 AOD for flood level and floor to floor heights of residential floors each reduced by 7.5cm, parapet detail developed at stage 4.

3.15 **Building C2** -250mm. Ground floor level reduced from 6.975 to 6.450 AOD for flood level, floor to floor heights of residential floors each reduced by 7.5cm, parapet detail developed at stage 4.

3.16 **Building D1** +200 increase in parapet height. Ground floor level increased from 6.300 AOD to 6.750 AOD for flood level, floor to floor heights of residential floors each reduced by 7.5cm, parapet detail developed at stage 4.

3.17 **Building D2** +800 increase in parapet height. Ground floor level increased from 6.300 AOD to 6.750 AOD for flood level, floor to floor heights of residential floors each reduced by 7.5cm, parapet and terrace detail developed at stage 4.

3.18 Other changes to the scheme proposals include the introduction of recessed/blank widows into the south facing facade of Block A, thus reducing the area of plain brickwork in the vicinity of the core.

#### Methodology

3.19 The assessment methodology applied in the original TVIA was based on GLVIA3 and is still appropriate and relevant to this addendum.

3.20 The original TVIA (and subsequent addenda) identified potentially sensitive receptors which could experience effects on townscape character or on visual amenity as a result of the Proposed Development. Notwithstanding the time that has lapsed since undertaking the initial baseline assessment in 2019, no significant changes in the baseline conditions described in the original TVIA have been identified.

3.21 The baseline conditions identified in the original TVIA have not therefore changed and the descriptions and assessments of receptor sensitivity in the TVIA remain valid.

3.22 To assist in defining potential effects, the sensitivity of the townscape character and visual receptors is considered. As outlined in the methodology, sensitivity is determined by combining assessments of value (set out in Section 3 of the original TVIA) and an appraisal of the susceptibility of the receptors to the updated Proposed Development.

3.23 For each receptor, the magnitude of change resulting from the Amended Proposed Development is described. The magnitude of change, upon completion, considers the effects in terms of duration, reversibility, geographical extent and size or scale. Effects of the updated scheme proposals are considered to be long term and permanent and to avoid unnecessary duplication, duration and reversibility are not discussed further.

3.24 The Addendum prepared in December 2019 (A209-RE03) considered both the original 12 Accurate Visual Representations (AVRs), along with two additional representative views that were prepared for the addendum in May 2019 (ref A209-RE-02). For the purposes of this addendum and due to the nature of the changes to the scheme proposals it was not considered appropriate to remodel all 14 AVRs and therefore six have been selected as representative and updated accordingly and the updated appraisal of effects on the representative views is provided in this section of the addendum.

### Effect on Townscape Character

3.25 This section considers the effects of the updated Proposed Development, upon completion, on townscape character. Definitions and criteria used are found in **Appendix B** of the original TVIA.

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

3.27 At a national level the townscape character has been considered in line with the NPPF and the Amended Proposed Development '*responds to local character and history, and reflects the identity of local and surrounding materials, while not preventing or discouraging appropriate innovation*', as set out in paragraph 58.

3.28 The updated scheme proposals continue to be of a scale and mass that will not detract from the surrounding context and will reactivate the street frontage and provide a new area of public realm to Manor Road.

3.29 The addition of the roof top plant which will be partially visible in some views, has been designed using materials that will complement the architectural style of the proposed buildings and therefore will read as an integral part of the development.

3.30 As a result of this approach to the updated scheme design the conclusions reached in the July 2020 Addendum (A209-RE04) remain unchanged and it is considered that the development will enhance the townscape character and visual appearance of this area of Richmond. It will provide a high quality architecture that improves legibility within the local and wider townscape which relates positively to the existing building line of Manor Road and respects the receiving local context.

3.31 Table 3.1 summarises the effects previously assessed which remain unchanged.

### 3.32 Effects on Visual Receptors

3.33 With the implementation of the updated scheme proposals it is considered that there may be a limited increase to the Site's ZTV (zone of theoretical visibility) due to the addition of the plant and roof over-runs to the roof tops of the buildings. Any increase however will be limited and it is not considered that this results in the need to consider additional viewpoints. The views from some of those previously assessed will, however, undergo a degree of change which will be described further below.

3.34 As previously assessed there will be temporary, localised changes in the view from some visual receptors during the construction phase, typically associated with the temporary enclosure of the Site with hoarding and views of construction plant. These effects are considered to be negative, however they will be short-lived and temporary in nature and the updates to the proposed scheme do not change this conclusions.

3.35 As set out in above and in order to identify and assess the likely effects of the Proposed Development on the identified views and visual receptors, 14 Accurate Visual Representations (AVR) were prepared and submitted previously within the TVIA and updated in subsequent Addenda.

**Table 3.2 – Visual Receptor Representative Views Appraisal of Effects**

Representative View	Value	Susceptibility to change	Sensitivity	Magnitude of change	Effect
1. Manor Grove	Medium	Medium	Medium	Medium	Moderate / Neutral
2. Manor Road, opposite Townsend Terrace	Medium-Low	Medium-Low	Medium-Low	Medium-Low	Moderate-Minor / Beneficial
3. Sheen Road, over Hickey's Almshouses	High	Medium	High-Medium	None	None
4. Dee Road	Medium-Low	Medium	Medium-Low	Medium	Moderate / Neutral
5. Church Road	Low	Low	Low	Low-Negligible	Negligible / Neutral
6. Trinity Road	Medium-Low	Medium	Medium	Medium	Moderate / Neutral
7. Lower Richmond Road/Manor Road roundabout	Low	Low	Low	Low-Negligible	Minor / Neutral
8. Sandycombe Road	Medium-Low	Medium	Medium-Low	None	None
9. View from Pagoda, Royal Botanic Gardens of Kew	High	High	High	Negligible	Minor / Neutral
10. Manor Road, Sainsbury's entrance	Low	Low	Low	Medium	Moderate-Minor / Beneficial
11. Manor Road, near Manor Grove	Low	Low	Low	High to medium	Moderate / Beneficial
12. Crown Terrace	Low	Medium-Low	Low	High	Moderate / Neutral
A.1 Broad Walk, Royal Botanic Gardens of Kew	High	High	High	None	None
A.2 Cedar Vista, Royal Botanic Gardens of Kew	High	High	High	None	None

3.36 In order to understand the likely effects of the update to the scheme proposals which now include detailed design proposals for the roof top plant etc. six of the previously prepared views have been selected to be updated. These focus on the views within closer proximity to the Site and are included below alongside a description of the proposed change and are set out below.

3.37 For completeness, however, a summary is also provided for the 8 views that have not been remodelled, viewpoints noting where visibility may change and the summary of the effects are included in table 3.2.

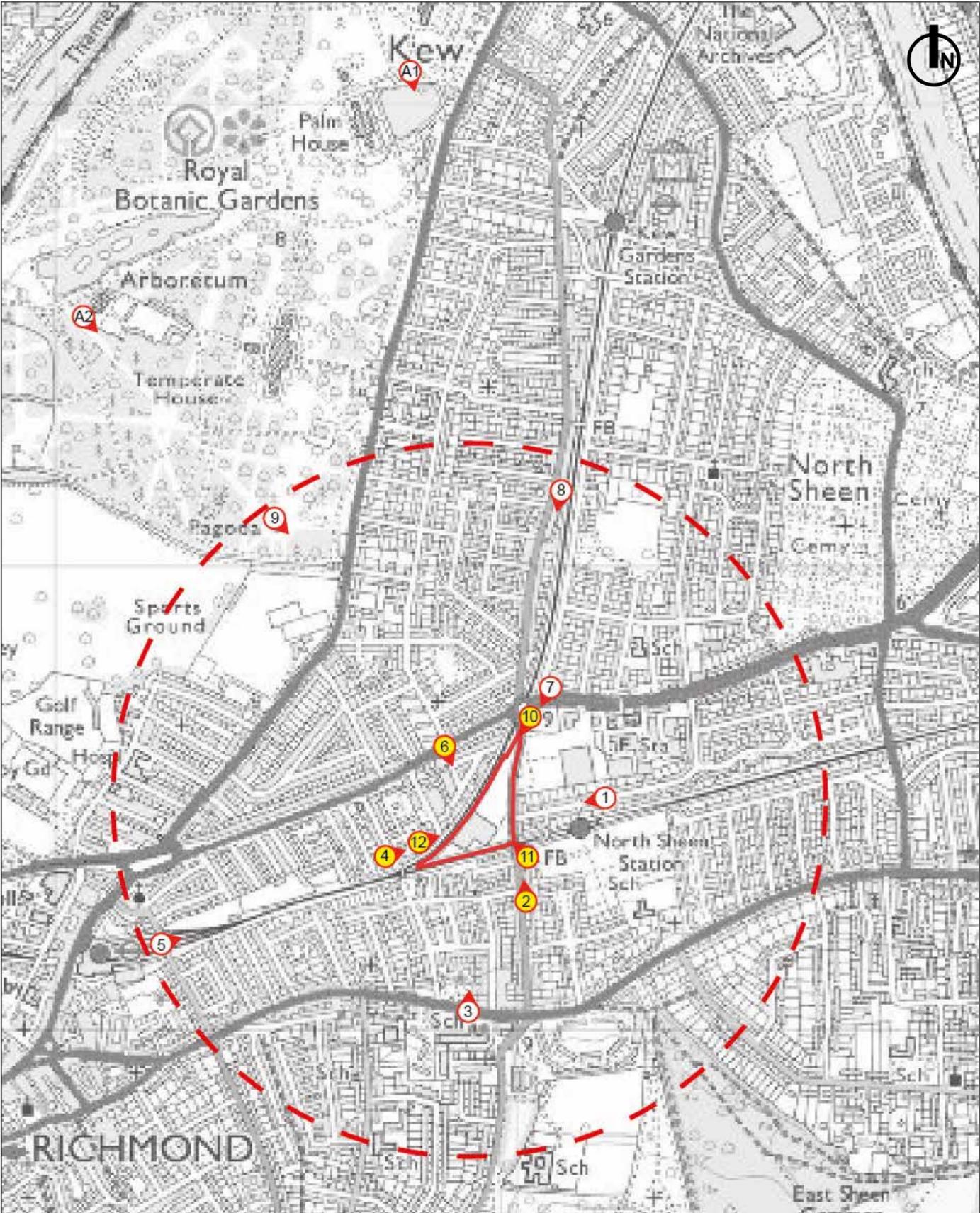


Figure 2 - Representative View Locations Plan

- Key:
- Site
  - Study Area
  - 1 Representative View Location
  - 2 Representative View- Remodelled to show roof plant

### Representative view 2 – Manor Road opposite Townsend Terrace



Location Plan

3.38 View 2 - Looking north along Manor Road, part of the proposed roof plant on Blocks A and D will be visible. The structures will be seen as part of the arrangement of buildings with taller elements set back from the street. The roof plant visible from this location will form part of this 'stepped' composition. The blank windows added to the south facing facade of Block A replace the previous flat areas of brickwork in the vicinity of the internal core.

3.39 The roof plant will be surrounded by metal screens of a colour that matches the metalwork and fenestration of the building and therefore whilst featuring as part of the view, they will read as an integral part of the proposed building.

3.40 The introduction of the roof plant will result in a limited change to the view however it is considered that the assessment previously undertaken remains valid and that the scheme proposals will continue to have a local, direct, permanent, medium-low magnitude of change and notwithstanding the addition of the roof plant, that the development will result in a **moderate to minor and beneficial effect**.



Representative view 2 - Proposed Situation

**Representative view 4 – Dee Road**



**Location Plan**

3.41 **View 4** - The view looking east along Dee Road will alter as a result of the addition of the roof plant within the view towards Blocks B and C. The plant on Block C is set back within the roof and therefore only the top part will be visible and as the colour of the proposed metal screen will match that used elsewhere on the facade, it will read as an integral part of the building, set back from the visible elevation. Block B includes a single projecting block which appears, in this view, to one side of the building. The elevated element is aligned with the angle of the facade and this, along with the proposed metal screening, will assist in integrating it into the architecture.

3.42 In respect of the assessment of effects it is considered that the change to the previously assessed view will be limited and that it remains a medium magnitude of change and a **moderate and neutral effect**.



**Representative view 4 - Proposed Situation**

## Representative view 6 – Trinity Road



Location Plan

3.43 **View 6** - Looking south along Trinity Road, Block B will remain a prominent feature of the view at the end of the road and the roof plant on top of the building will be seen as an elevated block to one side. The proposed plant is aligned with the angle of the facade and this along with the proposed cladding will assist in integrating it into the architecture.

3.44 In respect of the assessment of effects it is considered that notwithstanding the addition of the plant to the roof of Block B, that the change to the previously assessed view will be limited and that the remains a medium magnitude of change and a **moderate and neutral effect**.



Representative view 6 - Proposed Situation

**Representative view 10 – Manor Road looking south**



**Location Plan**

3.45 View 10 - This view, looking south along Manor Road and into the northern corner of the proposed development will undergo a limited degree of change as a result of the introduction of the roof plant onto the buildings. The additional structure on the roof of Block A, in the middle ground of the view, will be clearly visible though set back from the edge of the roof parapet. The roof plant will be set behind a metal screen of a colour to match the fenestration and metal work used elsewhere on the development and therefore read as an integral part of the building. The roof plant on other buildings that appear in this view will be partially visible but a much lesser degree.

3.46 Whilst the addition of the plant on Block A will be visually prominent from this location, the overall conclusions reached in the previous TVIA remain unchanged insofar as the scheme proposals will result in a medium magnitude of change and a **moderate to minor beneficial effect**.



**Representative view 10 - Proposed Situation**

## Representative view 11 – Manor Road



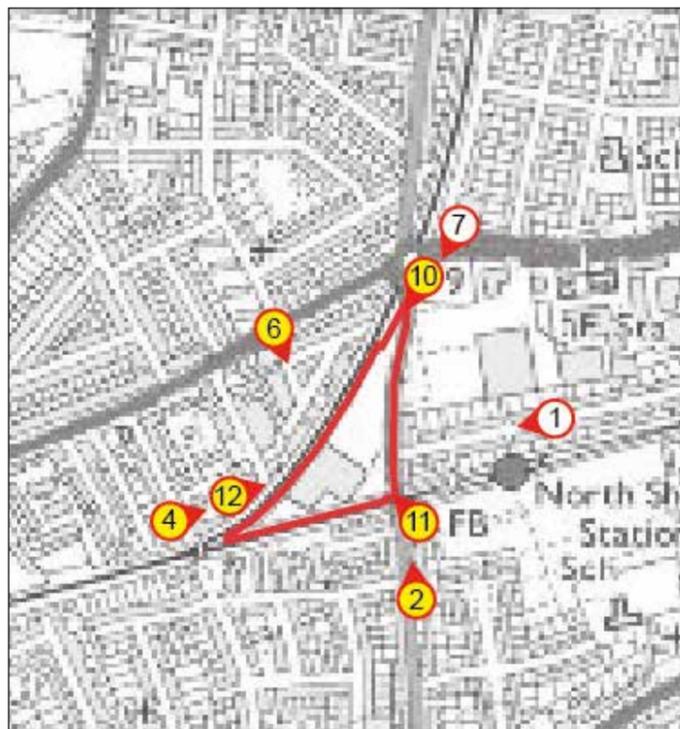
Location Plan

3.47 View 11 - This viewpoint looking north along Manor Road, is in close proximity to the development. Roof plant will be largely set back beyond the parapets and therefore not discernible from this location. The blank windows added to the south facing facade of Block A replace the previous flat areas of brickwork in the vicinity of the internal core and notwithstanding this improvement to this element of the building, the previous assessment of a high to medium magnitude of change resulting in a **moderate and beneficial effect** remains.



Representative view 11 - Proposed Situation

**Representative view 12 – Crown Terrace and Victoria Cottages**



**Location Plan**

3.48 **View 12** - Looking east from Crown Terrace, the proposed development will be prominent in the foreground (Block C) and middle distance (Block B and A beyond) of the view.

3.49 Due to the location, set back from the roof, the roof plant on Block C will appear as a small element and results in a very limited change to the view. The plant on Block B is located to one side and will be visible on part of the roof, though from this viewpoint location, views are filtered through the tree. Similarly a small part of the plant on Block A will be visible partially screened by Block B.

3.50 The proposed metal screen around the roof plant will assist in integrating the structures into the architecture and therefore the effects previously assessed remain unchanged with the proposed development having a high magnitude of change and a **moderate and neutral effect**.



**Representative view 12 - Proposed Situation**

3.51 The following sets out a summary of the anticipated change in view, where relevant, for the viewpoints that were not remodelled. The assessment is based on professional judgement based on an understanding of the proposals and likely nature of the view with reference to the six viewpoints that were modelled. Please refer to the original TVIA (A209-RE01) and previous Addendum (A209-RE04) for previous description of the baseline.

3.52 View 1 - (AVR not included). Looking west along Manor Grove, it is possible that a small part of the tops of part of the plant may be visible on the roofs of Blocks A, B and D. The plant, is however set back from the parapets and therefore it is likely that most of the plant will be out of sight. In light of the limited change to the view, the assessment of a **moderate and neutral effect**, remains unchanged.

3.53 View 3 - (AVR not included). Notwithstanding the additional height resulting from the roof plant, the development will remain out of sight and therefore there will be **no effect** on this view from this location.

3.54 View 5 - (AVR not included). The view from Church Road looking east along the railway is likely to undergo a limited degree of change as a result of the roof plant which will be visible on Blocks A, B and C. Due to the distance from the viewpoint and the proposed materials which will clad the plant, the elevated features whilst resulting in increased overall height will read as part of the stepped architectural form experienced from this location. It is considered that there is any change to the previous assessment which concluded that there would be a **negligible and neutral effect**.

3.55 View 7 - (AVR not included). It is anticipated that from this view looking south from the Lower Richmond Road roundabout will undergo a limited change with the proposed roof plant on Block A (in the foreground) being visible along with an elevated element of plant to one side of Block B, beyond. Whilst they will read as elevated roof top features, the proposed metal cladding coloured to match metalwork used elsewhere on the buildings along with set backs from the parapets will assist in the plant being seen as an integral part of the development. The previous assessment of the proposed development remain as a **minor and neutral effect** on this viewpoint.

3.56 View 8 - (AVR not included). Notwithstanding the additional height resulting from the roof plant, the development will remain out of sight and therefore there will be **no effect** on this view from this location.

3.57 View 9 - (AVR not included). It is probable that the additional roof plant may be partially visible from the top of the Pergola in Kew Gardens and it is anticipated that the increased height resulting from the roof plant on Block B will broadly align with the horizon in this viewpoint. Due to the distance away from the development and the proposed materials, the roof plant will read, as an integral part of the overall development which will assist in limiting any change to the previously assessed effects which remain as minor. The effects previously assessed remain valid for this location and as such the proposed development will result in a **minor and neutral effect**.

3.58 View A1 - (AVR not included). Notwithstanding the additional height resulting from the roof plant, the development will remain out of sight from this location in Kew Gardens and therefore there will be **no effect** on this view from this location.

3.59 View A2 - (AVR not included). Notwithstanding the additional height resulting from the roof plant, the development will remain out of sight from this location in Kew Gardens and therefore there will be **no effect** on this view from this location.

## 4. Summary and Conclusions

### Introduction

4.1 This addendum to the original TVIA (ref A209-RE-01) and subsequent Addenda, in particular that produced in July 2020, (ref A209-RE-04) considers the potential townscape and visual effects which could arise from the Proposed Development, taking account of proposed roof plant which has since been designed, limited changes to façades, adjustments to parapet levels and amendments resulting from the introduction of an additional escape stair.

4.2 The roof tops will include plant typically found on the roofs of new buildings and will include photovoltaic panels, mechanical plant and lift over-runs. Whilst the location of some features, eg lift over-runs are directly related to the buildings internal arrangements, options for the location of the roof plant has been tested to ensure, where possible structures are set back behind parapets, thereby reducing the visual impact when seen from the ground.

4.3 Similarly the design of screening around the taller features have been designed to reduce the visual appearance and the proposed finished and colour selected to match the bronze colour of metalwork that is proposed elsewhere. Whilst other options were considered, the design intent behind the selection of colour and material is intended as to allow the structures necessary for the functioning of the building to be designed in such a way that where visible they appear as integral parts of the architecture.

4.4 The maximum additional height of the roof plant structures, including any screens will be 3m above the ground level of the roofs which equates to approximately one storey height and whilst these are generally set back within the roof and sit behind the parapets that form the perimeter of the taller buildings, some of the screens around roof plant structures will be visible from street level.

4.5 The addition of an extra stair within the buildings result in an increase of the overall footprint as set out in Section 3, however these increases are within internal courtyard areas and therefore do not result in any changes to the views from neighbouring streets.

4.6 In respect of the effects on Townscape, this Addendum has considered the anticipated changes resulting from the further design development and resultant roof plant structures as well as changes to parapet levels. It is considered that notwithstanding the additional form, visible from some locations, that the updated scheme will result in the same conclusions reached in the July 2020 Addendum (A209-RE04) and it is considered that the development proposed will enhance the townscape character and visual appearance of this area of Richmond. It will provide a high quality architecture that improves legibility within the local and wider townscape which relates positively to the existing building line of Manor Road and respects the receiving local context.

4.7 In considering the changes to views and visual amenity the six viewpoints which have been updated, accurately demonstrate that the additional structures containing the roof top plant will be visible from a number of locations previously assessed. It is not considered, however that the localised increase in height on parts of the buildings results in the need to assess additional viewpoint locations.

4.8 As previously assessed in the original TVIA and subsequent Addenda, the existing views to the Site are largely restricted due to the surrounding built form, with partial to open views gained from the immediate townscape of Manor Road, Manor Grove, Dee Road and Trinity Road.

4.9 With the implementation of the Proposed Development it is considered that the visibility of the Site will increase, however the Proposed Development assessed with the inclusion of the roof plant, will not adversely affect any views of importance or the visual appearance of the local area.

4.10 Having considered the changes to the six views which have been re-modelled and using these to assist in anticipating changes, where relevant, to the other eight views, resulting from the introduction of the proposed roof plant and other design changes, does not result in any changes in the assessment of effects previously reached.

### Overall Conclusions

4.11 A number of minor changes to the scheme proposals have been assessed within this Addendum. The changes resulting from the addition of an extra stair for fire safety reasons results in no overall change to the views or townscape.

4.12 It is acknowledged that some of the structures screening the taller elements of roof plant will be visible from street level and therefore result in a minor change to the views previously assessed in the TVIA and Addenda. The design of these features employs an approach that seeks to allow the plant to integrate with the overall architectural design and whilst they may be recognisably different in their use from the residential parts of the buildings, the plant is not considered to materially affect the overall appearance of the development or result in any harm to either the townscape character or visual amenity of the views assessed.

4.13 In addition to the above consideration has been to the emerging Policy 31 which adds 31 views and vistas to those already protected by LBRuT policy and having reviewed the 31 locations set out in the draft SPD, it is not considered that the proposed development will effect any of those listed.



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