



Planning Committee 15th November 2023

Addendum

The Addendum details amendments made to the agenda reports since their publication. It may include corrections to the report, additional information (such as extra informatives and conditions) and late correspondence received in relation to the agenda items.

Case Reference 22/2556/FUL – Greggs and 2 Gould Road, Twickenham

1. Late representations since the publication of the Committee Report

6 additional late representations have been submitted to the applications, 4 in objection and 4 in support. The reasons are summarised below, along with a number of images which were submitted as part of the objection comments.

Whilst it cannot be added to this document, it is noted that one video representation was submitted by an objector showing congestion in a road junction nearby the application site.

It is further noted that the applicants submitted copies of the Council's Committee Reports with annotated comments on potential errors.

Objections

- Concerns over additional traffic congestion
- Significant traffic safety issues in the area will be made worse by proposal
- Existing “log jams” at the corner of Gould Road and Crane Road
- Parking pressure intense in the area
- Insufficient car parking proposed
- Questions raised over TRICS calculations
- When considering the impact of the proposals on the development, consideration should be given to the fact that there is no through site road, and that the sector accessed from Gould Road only has 20 or so car parking spaces
- Report fails to point out that there are restrictive covenants in place binding the sector of the site to the north of Gould and Crane Roads, precluding the construction of a road on the sector to the north of Gould Road without written consent of the successors in title to the plots of land

- Report does not address the many concerns raised by local residents including those on Crane and Gould Roads, and at the corner junction of the two, about the location of the proposed exit to the site
- As to the proposed entrance/exit to the site (2557/FUL) and exit (2556/FUL) at the corner of Gould and Crane Road, residents do not agree with the conclusions of the report that trip generation will be reduced by the current proposals
- Error noted in report for the residential scheme (2556/FUL) at paragraph 8.135 with regard to site access
- Would have expected to have seen a thorough/detailed report from the Council's Highways team on the applicant's modelling and evidence to support its suitability and safety as a site entrance/exit
- No swept path analyses having been provided for a large car
- In respect of the construction management plan for application 2556, the Officer's Report states at paragraph 8.151 that the applicants have indicated they would suspend a number of CPZ bays on Edwin Road, but there is no reference to the suspension of bays at Gould Road
- Officer's report does not seem to include any evidence that the issue of capacity of the public transport network to support a development of this density has been adequately addressed, or that the consequential impact of the development on the public transport network or how greater capacity can be achieved has been considered
- TfL should have been consulted
- Insufficient play space for children and young people
- Concerns raised over whether this space represents an adequate type dedicated on-site play space, including on a rooftop, immediately adjacent a road, or in a public space by the river
- Officer's report states that additional play space has been provided since the application was submitted, however, the changes to the plans seem to indicate that rather than providing more "space" per se, some of the fairly minimal existing public green/open space on site has simply been reallocated or "re-designated" as "dedicated play space"
- Failure to provide this on-site will not only exacerbate the pressure on the existing open spaces and not comply with the intent of the London Plan 2011 SPG
- The Council's SPD on Planning Obligations (2020) states that "the expectation is that the identified requirement of play space is to be provided on-site" but that there may be "exceptional circumstances in which it is not possible to do so", however the Reports do not identify any "exceptional circumstances" which would justify an off-site financial contribution in lieu of "actual" space
- This sets a very dangerous precedent for future development in the Borough
- Development is not in keeping with the type of housing in the neighbouring streets
- Excessive massing proposed
- Loss of light to neighbouring properties

- Development will set a precedent for future developments in which maximising affordable housing is prioritised above the well-being of the existing community
- The PR company 'Cascade' is suggesting that the plans enjoy a large amount of support locally, which is incorrect
- It is clear from the huge number of objections raised to the planning applications that there is no real support from those who are impacted by the proposals
- Between the first set of proposals, which were rejected, and this set of proposals, a scant number of the concerns of the residents who objected have been addressed
- Suggest Councillors revisit the many objections to the planning prior to the meeting, in order to see that the original concerns remain largely unaddressed by the so-called 'new' proposals
- Do not agree with the conclusions at Paragraphs 8.79 (2556/FUL) and 8.76 (22/2557/FUL) of the Officer's report that the density of the development is in keeping with the area
- Officer's report does not address specific objections to the choice of roads used as comparators nor the apparent lack of consideration given to the density in terms of habitable rooms per hectare on the site

One of the objection comments raised a number of questions regarding the Officer Report which are outlined as follows (The Council officer response is in bold italics beneath):

Density of the development

a) Have the Officers calculated the density of Norcutt, Crane and Gould Roads combined to compare it with the density of the proposed development, both in terms of the number of units and habitable rooms per hectare?

(Officer comment: Previous application noted that Norcutt Road contains 103 units/ha or 440 hr/ha, and Hamilton Road contains 99 units per hectare, or 396hr/ha. The applicant's current proposal of 342 hr/ha is not considered out of character with the local urban grain and density ranges. It is noted that the density matrix has not been included under the current London Plan (2021), the policy now requiring planning officers to assess local development proposals on a subjective evaluation of local characteristics.)

b) With 342 habitable rooms per hectare, at the upper end of the London Density Matrix for an "Urban area" (200-450 hr/ha), significantly exceeding the range for a "Sub-urban area" (150-250 hr/ha), and within the range for a "central" development (300-650 hr/ha), would the Officers agree that the density proposed for the Residential scheme in terms of habitable rooms per hectare is more in keeping with a central or central/urban development than a suburban or outer urban development in PTAL zone 2?

(Officer comment: No, the proposal is considered acceptable for an area of tight-knit older terraced housing. As per above, the proposal is considered to meet the density characteristics of the area.)

Traffic, highways impact, and safety of corner of Gould Road

- a) Could the Officers clarify if there is an error in the Report for the residential scheme (2556/FUL) at paragraph 8.135 which appears to suggest that the Gould Road access to the site will be used for both vehicular access and egress, in contradiction to paragraph 8.130 which appears to indicate that Gould Road would just be used as an exit?

(Officer comment: Yes, this error has now been corrected as part of this Addendum – Gould Road is proposed to be a point of egress only under app ref: 22/2556/FUL.)

- b) The TRICS data set out in the report for the existing site appears to show that the proposals would result in a net increase in vehicular trips at the AM and PM peaks, but the Officer concludes that it will result in a net decrease, on the basis of estimated figures for trip generation for the existing site which are much higher than the TRICS data set out. What methodology has been used to arrive at the higher estimates?

(Officer comment: Council Transport Officer first ran his own TRICS multi-modal assessment of B2 sites in Greater London with a PTAL of no higher than 3 and included sites in areas with high levels of household car ownership (1 car or above per household). The TRICS multi-modal assessment gave a total of 66 two-way vehicular trips in the AM weekday peak hour. Of these, 13 were by car, 7 were by HGV, and 46 were by LGV. The same multi-modal assessment gave a total of 34 two-way vehicular trips in the PM weekday peak hour. Of these, 14 were by car, 2 by HGV and 18 by LGV. Another test was then run to cross reference this by taking the total person trips created in the AM and PM weekday peak hours for 7,371 square metres of B2 land use in Greater London, in areas with a PTAL of no greater than 3 and with high levels of household car ownership. The Officer then derived the percentage of respondents to the 2011 Census who told it that they commuted to work by car into the MSOA in which the former Greggs site is located. This dataset informed that 39% of people who said they commuted into this MSOA did so by car as the main driver. With this information, the Officer calculated 39% of 154 people in the AM weekday peak hour, which came to 60 two-way car trips in the AM peak hour. The Officer then added 7 HGV trips and 46 LGV trips to give a total of 113. The Officer followed the same process for the PM weekday peak hour trips, so 39% of 94 people is 37, plus 2 HGV trips and 18 LGV trips, which 57 vehicular trips)

c) In concluding that the proposals would result in a net decrease in trip generation, did the Officers ever calculate the impact on trip generation specifically at the Gould Road access point, particularly in terms of the “existing” trip generation at that point, given that the site is split in two by buildings, with no through site road, and that the existing access at Gould Road only serves the office buildings and only has 25 parking spaces?

(Officer comment: Calculations were made for B2 sites in general; applicant made site specific TRICS assessment.)

d) Have swept path analyses been produced for large cars?

(Officer comment: No, this is not something the Council assesses as the analysis is based on an average sized vehicle including cars, refuse lorries etc.)

e) Given the significant community concern about the impact on highway safety and the impact of locating an entrance/exit to a development of this density at the corner of Gould and Crane Roads, did the Council’s Highways team produce any detailed report on the applicant’s modelling and evidence to support its suitability and safety as a site entrance and exit? And, if so, has this been published?

(Officer comment: No, as a regulatory authority, with the exception of planning reports, the Council does not produce its own reports on submitted planning applications and only makes an assessment of the documents submitted along with any third part submissions received. The applicant’s Transport Assessment has been assessed by the Council and highway safety impacts are considered to be acceptable.)

f) Have the Officers fully considered the nature of the road junction and roads, and not just the numbers for “existing” and “proposed” trip generation in drawing their conclusions about its suitability and safety?

(Officer comment: Yes, the specific nature of roads in an area forms part of the Council’s assessment of a planning application.)

g) If each site entrance has not been considered as a separate traffic generator, is it realistic to conclude that the development would not have a negative impact on highway safety at the corner of Gould and Crane Roads?

(Officer comment: Yes, the Council’s transport planners consider the scheme acceptable in terms of highway safety)

h) In terms of the construction management plan, paragraph 8.155 of the report for application 2557/FUL states that the Council’s Transport Officer noted that a small number of CPZ bays will need to be suspended to ensure construction

vehicles can enter and exit the site safely, but it neglects to specify where. Would these be suspended on Edwin Road and Gould Road, or just at Edwin Road as stated for 2556/FUL?

(Officer comment: The suspensions would be required on both Edwin Road and Gould Road, and the specific locations are shown in Figure 3-3 (Site Routing Plan) of the applicant's Outline Construction Logistics Plan.)

Public Transport

a) Given the significant community concern regarding the capacity of the public transport network to support a development of this density, was TfL consulted on these proposals?

(Officer comment: Yes, TfL were consulted however, as noted in the Committee Reports, no response was received from them on either application.)

b) Did the Council's Transport Officers produce any reports addressing the concerns raised in the Transport Consultants report prepared on behalf of local residents, and in comments on the applications, regarding the capacity of the public transport network to support the development and the incorrect inclusion in the Applicant's Transport Assessment of bus services no longer serving the area and bus frequencies not matching TfL's own published timetables or observed service frequencies?

(Officer comment: No, as per the above response, the Council does not produce its own reports on submitted planning applications, only makes an assessment of the documents submitted along with any third part submissions made on it.)

c) How does the Council propose achieving more capacity on the public transport network to service the extra demand generated by the proposals?

(Officer comment: This is a TfL matter and for them to comment on if an adverse impact needed to be mitigated)

Play space

a) Will the on-podium 109 sqm of "dedicated play space" for 0-4 year olds be accessible to all residents of the development and the general public

(Officer comment: Yes, it would although it is understood the type of play space will be aimed at 0-4 year olds.)

b) Is it anticipated that this space (previously designated as "multi-purpose space") will also be frequented by people without children, or families with older

children? Or is it intended that it now be used exclusively by families with children aged 0-4 years old?

(Officer comment: As above.)

c) Has the landing space for the proposed bridge over the River Crane been included in the calculations for dedicated on-site play space for 0-4 year olds? If so, does this mean that the idea of a bridge has been permanently abandoned, or that some of this space would be lost from the play space totals if the bridge were to receive planning approval?

(Officer comment: Neither the landing area nor the bridge are proposed as part of these applications, therefore the Council cannot make this assessment.)

d) Is it appropriate for play space for 0-4 year olds to be located immediately next to a road and car parking spaces, at the corner of the through-site road?

(Officer comment: Traffic speed will be restricted on the through road and young children's playtime is usually supervised)

e) Could the Officers clarify how they arrive at a figure for 576 sqm of dedicated on-site play space in paragraph 8.195 of the report for 2557/FUL?

(Officer comment: This amount has been corrected to 374sqm.)

f) Are there any exceptional circumstances explaining why play space requirements for all ages are not being delivered on-site and why the Council is prepared to accept an off-site contribution, given that existing play spaces are beyond prescribed distances and already at or exceeding capacity, and particularly scant in the borough for older children?

(Officer comment: The majority of play space is provided on site, and the competing interests of the development are acknowledged, particularly in relation to ecology/biodiversity and tree matters near the river, and these circumstances are considered to justify the allowance for an off-site contribution in this instance.)

g) If there are no exceptional circumstances, does the lack of sufficient or adequate on-site provision for all ages on-site not set a dangerous precedent for future development in the Borough, particularly as the lack of appropriate on-site play space will disproportionately affect the residents of the affordable units, which tend to be the ones provided with less private amenity space?

N/A

Image 1



Image 2



Image 3



Image 4



Image 5

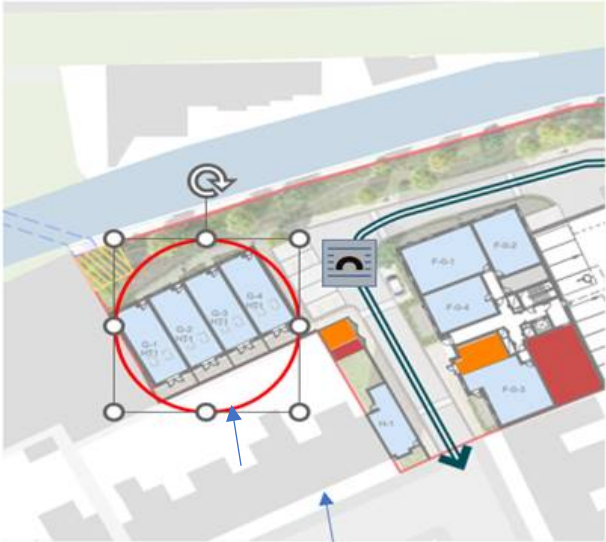


Image 6



Image 7 & 8



Image 9



Image 10

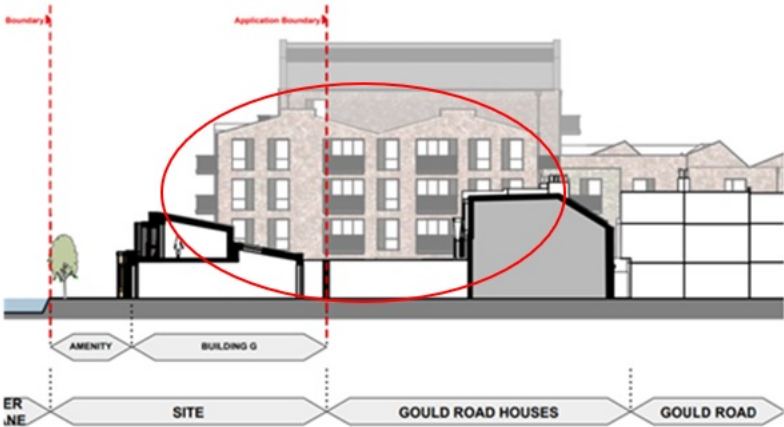


Image 11



South elevation – Block F

Image 12



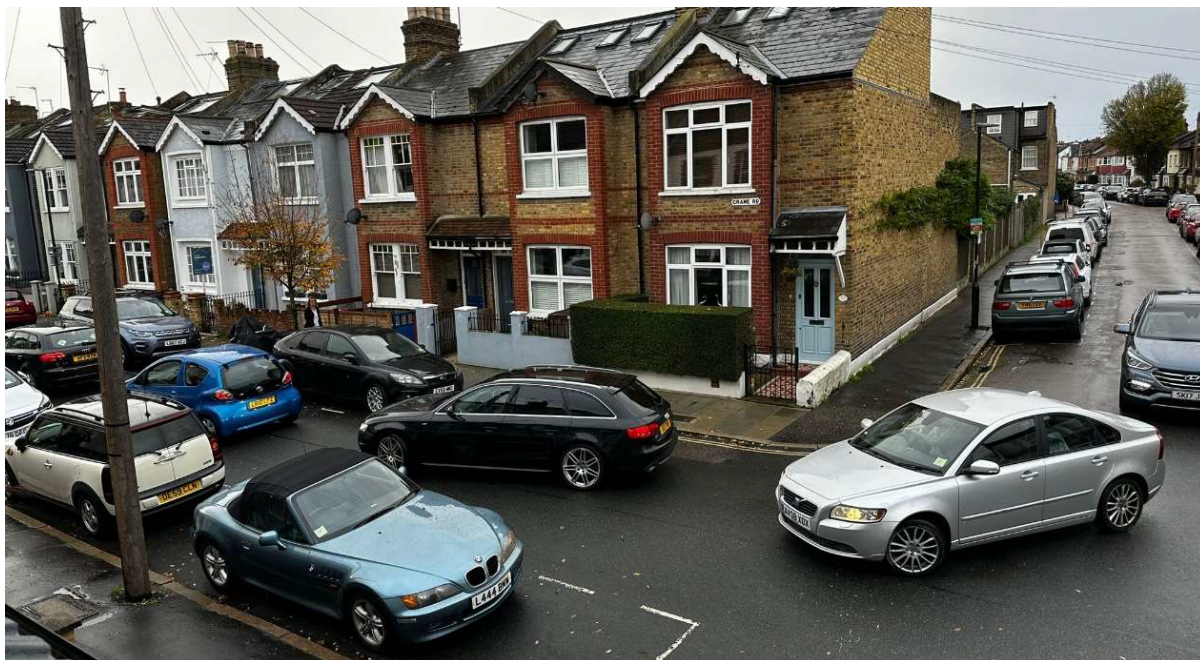
Image 13



Image 14



Image 16



View from Bedroom Window house in Norcutt Road



View from Bedroom Window house in Norcutt Road





Greggs Edwin Road Entrance

Signage Junction of Marsh Farm Road and Colne Road



Signage Junction of Edwin Road & Crane Road

Support

- Support both proposals but preference is for the option, which offers the larger number of residential units due to the housing need in the borough

- Proposed open space would open up this stretch of the River Crane, complementing the regeneration work that has already taken place in the locale
- Community would reap the health benefits of being able to access this beautiful, natural space
- Housing, including a good proportion of affordable which this plan delivers, is in demand in this area
- There is a shortage of affordable housing in Twickenham
- The scheme is well planned with design sympathetic to the surroundings
- The site has been derelict and an eyesore for far too long
- The former bakery is an out-dated industrial space that, in the modern world, would not be built so close to existing homes in the middle of a residential area
- Lorries struggle to access the site down narrow roads at all hours of the day
- There appears to be ample space for commercial and industrial use elsewhere without going for the other option for this site
- Crane Mews, in Gould Road, was intended for business use but some of these units have been converted to residences, indicating that there is not much demand for business/industrial/commercial use in the immediate area

2. Corrections to report

Paragraph	Correction
1.13	Replace #234# with #220#
1.13	Replace #8# with #4#
1.15	Replace #71# with #78#
3.1	Remove #but are understood to retain an operational presence#
4.3	Replace #one, two and three bedroomed units# with #one, two, three and four bedroomed units#
4.5	Replace #234# with #220#
4.5	Replace #8# with #4#
4.8	Replace #residential led # with #industrial led #
8.3	Replace #The proposal is for provide 97 residential units and 175 sqm industrial floorspace (Use Class E(g)(iii)), all will be affordable workspace# with #The proposal is for 116 residential units and 175 sqm commercial floorspace (Use Class E), all affordable work space#
8.21	Removed #mostly#
8.44	Replace #22/2556/FUL# with #22/2557/FUL#
8.44	Replace #24%# with #30%#
8.103	Replace #478/483 (99%)# with #475/483 (98%)#
8.104	Replace #73 Norcutt Road# with #74 Norcutt Road#
8.135	Delete #access to and# and #the residential part of#
8.128	Replace #234# with #220#
8.128	Replace #8# with #4#
8.193	Replace #71# with #78#
9.4	Replace #£2,819,127.78# with #£3,538,556.82#
9.5	Replace #3,766,680.87# with #£4,634,487.00#
10.14	Replace #234# with #220#
10.14	Replace #8# with #4#

10.16	Replace #71# with #78#
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As per above, the estimated CIL shown in the Committee reflects that of 22/2557/FUL, and the adjusted amounts are shown in the following table. The total estimated amount of CIL for this development is £4,634,487.00.

Community Infrastructure Levy (CIL) estimate	
Mayoral CIL	£1,095,930.18
Borough CIL	£3,538,556.82

Table 4 (RESIDENTIAL DETAILS) is to be replaced with the following corrected table:

RESIDENTIAL DETAILS:

	Residential Type	No. of bedrooms per unit						Total Habitable Rooms
		Studio	1	2	3	4	Total	
Existing	Private/Market			1			1	4
Proposed On-Site	Affordable Rent		23	17	7		47	126
	Shared Ownership		6	5			11	27
	Private/Market		4	11	39	4	58	234
	Total		33	33	46	4	116	387

Table 5 (PARKING DETAILS) is to be replaced with the following corrected table:

	Car Parking Spaces (General)			Car Parking Spaces (Blue Badge)			% EVCP
	Resi	Commercial	Visitor	Resi	Commercial	Visitor	
Existing		26					
Proposed	100	0		10	1		100

	Cycle Parking Spaces (Long Stay)		Cycle Parking Spaces (Short Stay)	
	Resi	Commercial	Resi	Commercial
Existing				
Proposed	216	2	4	2

Case Reference 22/2557/FUL – Greggs and 2 Gould Road, Twickenham

1. Late representations since the publication of the Committee Report

- The support and objections are the same as those outlined for 22/2557/FUL above.

2. Corrections to report

Paragraph	Correction
1.7	Replace #0 to 5 year olds# with #0 to 11 year olds#
1.7	Replace #576 sqm# with #374 sqm#
3.1	Remove #but are understood to retain an operational presence#
4.5	Replace #234# with #216#
4.5	Replace #8# with #2#
8.29	Replace #116# with #97#
8.128	Replace #234# with #216#
8.128	Replace #8# with #2#
8.135	Delete #the residential part of#
8.135	Replace #a restructured vehicular access bell-mouth access on the northern side of Gould Road# with #upgraded vehicular bell-mouth accesses on the northern side of Gould Road and reconstructed vehicular access on the northern side of Edwin Road#
8.135	Replace #reconstruct the crossover as a bell-mouth to make sure that the carriageway and footway of the private access road north of the access tie into it safely# with #to carry out these works#
8.162	Delete entire paragraph (copy of para 8.161)
8.195	Replace #576 sqm of dedicated on-site play space for 0 to 5 year olds# with #374 sqm of dedicated on-site play space, 203 sqm for 0-4 and 171 sqm for 5-11#
8.195	Remove #The riverside strip covers the 0 to 4 year olds and part of the 5-11 year olds# and #remainder of junior children (5 to 11 years) and#
10.7	Replace #0 to 5 year olds# with #0 to 11 year olds#
10.7	Replace #576 sqm# with #374 sqm#

Case Reference Tree Preservation Order T1090 – Sheldon House, Cromwell Road, Teddington

1. Corrections to the report:

Amend paragraph 8.5 of the report to read “An application ref. 23/0741/FUL was received notifying the council of the intention to develop the site which included the removal of trees. The TPO is therefore considered expedient to prevent the removal of the trees outside of a planning approval.”

2. Additional materials received:

Tree maintenance schedule table received from the speaker for the item.