



Da Vinci House
44 Saffron Hill
London EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

Planning Department
London Borough of Richmond
Civic Centre
44 York Street
Twickenham
TW1 3BZ

FAO

3rd December 2024

Our ref. LW/EH – 614
VIA EMAIL

Dear Planning Department,

Regal House, 70 London Road, Twickenham, TW1 3QS
APPLICATION FOR FULL PLANNING PERMISSION TO PAINT A MURAL ON THE SOUTHERN
FLANK ELEVATION OF REGAL HOUSE

We write on behalf of our client, Akoya Regal Limited ('the Applicant') to formally submit an application for full planning permission for the painting of a mural on the southern elevation of Regal House, 70 London Road, Twickenham, TW1 3QS ('the Site').

The application seeks planning permission for the following development:

"Installation of a mural (15.24m x 30.48m) on the southern flank elevation of Regal House, 70 London Road"

In support of this application, we provide the following documentation:

This Planning Covering Letter prepared by Iceni Projects

Application forms, prepared by Iceni Projects via the Planning Portal

CIL Form, prepared by Iceni Projects

Existing Elevation (41870XX-EL-ETH), prepared by Dthree

Proposed Elevation (41873-XX-EL-STH), prepared by Dthree

Site Location Plan (41873-SITE-LO), prepared by Dthree

London Ecosystem Restoration Twickenham Wall Presentation, prepared by Street Art for Mankind

To confirm, an application of £363 has been paid via the Planning Portal. This has been based on the site area of the elevation as the application only applies to this portion of the site.

a. Project rationale and ‘Street Art for Mankind’

The Applicant acquired Regal House in 2022 and, since that time, has worked closely with the London Borough of Richmond on Thames (‘the Council’) on a range of refurbishment proposals to Regal House to modernise and upgrade an important employment space and prominent building in Twickenham Town Centre.

To further enhance the sites presence in the townscape, the Applicant has partnered with Street Art for Mankind¹ (SAM), a UN-backed non-profit organisation that unites street artists from around the world, to deliver a striking new mural to the southern flank elevation of Regal House, 70 London Road.

SAM is a 501(C)(3) non-profit organization that strongly believes in the power of Art to trigger social change. With the support of over 80 prominent international street artists, SAM curates and produces large murals, interactive exhibitions and live performances around the world to bond communities and generations around human rights.

SAM is creating 50 murals to raise awareness amongst the public on the critical need to halt, prevent and reverse ecosystem degradation, and to effectively restore degraded terrestrial, freshwater and marine ecosystems across the globe. The goal is also to unite local and global initiatives and trigger action. This initiative kicked off in Brussels, with a large 40 meter high “Ecosystem Restoration” mural by artist [Lula Goce](#)

SAM are now partnering with [Vesod](#), an Italian Street Artist, to deliver a mural that celebrates and promotes healthy ecosystems in London. This would be the 6th of the series - after Brussels, Houston, New York, Detroit and Seattle.

In preparing the mural design, the Applicant has held informal discussions with Local Ward Councillors who have provided their in-principle support for the mural. Councillors also assisted in devising the brief for Vesod to prepare the proposals forming part of this application.

The Applicant is excited to submit this application and, subject to receiving permission, having the mural painted in February 2025, and unveiling taking place on 6th March 2025.

b. The Application Site

Regal House is a part 8, part 9-storey 1960s modern L-shaped office block with frontages to London Road and Arragon Road, and adjoins Twickenham Station which is located to the north of site. To the rear of the building is a hardstanding area that is used for car parking and access. The southern flank elevation, which is currently blank with cladding, is the location of the proposed mural.

The surrounding area is predominantly commercial with mid-rise office development concentrated on London Road with the 5-storey Haymarket office building on the opposite side of London Road to the west and the 5-storey commercial Premier House to the south.

The site is located within the main centre boundary of Twickenham, defined as a “district” town centre in the London Plan, is within a key Office Area and the Twickenham Area Action Plan boundary.

The Site has a PTAL Site has a PTAL rating 5, which demonstrates that the Site has very good access to public transport.

The site is not subject to any Heritage designation, and does not sit in a Conservation Area.

The Site is located within Flood Zone 1, the lowest probability of flood risk.

¹ Further detail on Street Art for Mankind can be found at: <https://streetartmankind.org/>



The Southern Flank Elevation of Regal House

c. Relevant Planning History

The site has an extensive planning history, showing numerous interventions as part of ongoing asset management work such as plant, telecommunications, façade, changes of use and signage alterations. As such only the applications most relevant to the determination of this application are noted below, relating to its overall refurbishment and use.

23/0389/FUL - Front pergola, alterations to front ground floor fenestration; provision of new cycle parking facilities, replacement and provision of new plant at roof level together with the installation of external riser on the rear elevation. Planning Permission Granted 31/03/2023.

17/0064/FUL - Replacement of existing front entrance doors and installation of new shower room rear entrance door and associated new rain screen cladding. Planning Permission Granted 15/03/2017.

12/2518/COU (1st Floor Regal House) - Change of use from Class B1 offices to Class D2 leisure to provide a 24 hour gym at the first floor (North) of Regal House. Planning Permission Granted 09/11/2012.

10/3780/FUL - Upgrading of all facades. Replacement of main entrance canopy, new secondary entrance to the building on London Road with an associated footbridge. Planning Permission Granted 12/04/2011.

00/3262 - Elevational Alterations to Ninth Floor by Way of New Cladding System To Facade. 28/12/2000. Planning Permission Granted 28/12/2000

d. The Proposed Mural

The proposed development seeks full planning permission for the installation of a mural on the southern flank elevation of Regal House, 70 London Road. The mural would have dimensions of

15.24m wide x 30.48m in height and would be painted directly onto the existing cladded exterior of the building.

Vesod's work is characterized by high contrast figures full of staggered motion and bright geometric abstractions, with renaissance art and futurism also having an important impact on his work. Vesod creates a personal language in which time is considered as a concept, which by being closed into immaterial solid shapes, is crystallized into geometric shape in order to revisit the idea of the eternal present.

The mural (as shown in the image below), named "N6tur3", was inspired by the classic figure of Mother nature. In a futuristic yet classical style, Vesod proposes a poetic vision of the future where cities and nature make one in harmony. The anthropomorphic tree represented is a willow, and the animals are all from the local Twickenham River side fauna such as kingfishers, herons, water voles and badgers, representing a vital ecosystem balance.

The anthropomorphic tree suggests a strong bond between man and nature, and the metamorphosis of London into a river landscape is also intended to suggest the future possibility of transformation and balance between humanity and nature.

The yellow flag iris in the hands of the woman glows, representing a gift from nature, and the kingfisher on the top of the painting reminds us of a phoenix, representing nature being reborn.



The proposed mural

Further detail on the proposed mural is provided on the existing and proposed drawings produced by JRA Architects and within Lonon Ecosystem Restoration Twickenham Wall Presentation, prepared by Street Art for Mankind.

e. Planning Framework and Planning Considerations

The need for planning permission

The Town and Country Planning Act 1990 (as amended) provides the statutory definition of what constitutes 'development' and therefore what requires planning permission or not. Section 55(2)(a)(ii) of the Act makes it clear that the carrying out of maintenance, improvement or other alterations of existing buildings is not defined as development, so long as the works "*do not materially affect the external appearance of the building*".

It is noted that the judgement on what materially affects the external appearance of a building is subjective. However, the Applicant has considered that it would be prudent to apply for planning permission for the proposed mural.

The Development Plan

Although the Government's NPPF and Planning Practice Guidance (PPG) are important material considerations to be taken into account in determining planning applications, the planning Acts confirm that the 'Statutory Development Plan' should be the starting point for such decisions. In this respect, Section 38(6) of the 'Planning and Compulsory Purchase Act 2004' (the Act) states:

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise."

The Development Plan for the Royal Borough of Richmond Upon Thames consists of:

The London Plan (2021)

Richmond Local Plan (2018)

Twickenham Area Action Plan (2013)

LB Richmond Upon Thames is currently preparing a new Local Plan which would replace the current Local Plan and Twickenham Area Action Plan. The latest update on the Council's website states that between March and April 2020 engagement was held with residents, stakeholders and businesses to comment on the scope and vision for the new Local Plan. At this early stage, there are no draft policies, so the document carries no weight.

Richmond Council also has a number of supplementary planning documents / guidance (SPDs/ SPGs) which form material considerations. The Design Quality SPD (2006) is of relevance to this application.

An assessment of the relevant planning considerations for the development is provided below.

The principle of development

Good design is a central objective of London Plan Policy D4, as is echoed in Local Plan Policy LP1. Policy LP1 sets out that all developments should be of high architectural and urban design quality, and the high-quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise.

The supporting text to Policy LP1 sets out that the Council does not wish to encourage a particular architectural style or approach, but requires developers and applicants to take a sensitive approach to the modification of existing buildings.

The Richmond Design Quality SPD further notes that development proposals should respond to the character and context of its setting, including consideration to the street setting, typical activities and use mix of the surrounding area.

Specific reference is made to improving wayfinding and legibility of spaces, noting that focus points should be created to aid legibility. The importance of a memorable and navigable townscape is noted, which is achieved by a sequence of views terminated with landmarks, which helps enhance perceived levels of safety and comfort.

The Twickenham Area Action Plan focuses on making the centre a more inviting place at all times of the day and evening for people of all ages, enhancing and making the most of the character of the centre's built and open environment, and enhancing the leisure, entertainment and cultural offer, including improving the range and quality of attractions, to attract people into the centre.

In the above context, the proposed mural is considered to comply with these relevant policies of the development plan in the following ways:

The mural would be painted by an award-winning local artist, backed by Street Art for Mankind, a not-for-profit organisation funded by the United Nations. They have successfully commissioned high-quality, striking murals across the world that evoke a range of important themes that are prescient in society. The proposed artwork for Regal House would maintain the reputation of high-quality and outstanding work, promoting important themes of ecosystem restoration and enhancement to Twickenham.

The existing building holds significant presence on the street scene due to its large size and prominent situation, however it makes a neutral contribution to the character and appearance of the Twickenham Town Centre in terms of design. The southern elevation is currently blank and uninviting, and therefore the introduction of a mural on this elevation would enhance the overall design of the existing building whilst adding meaningful cultural interest to the wider townscape for Twickenham Town Centre.

Given the prominence of the southern elevation, the mural will offer a significant landmark for Twickenham Town Centre and provide a memorable piece of townscape for residents, workers and visitors. This will contribute to Twickenham's overall sense of place and local character, whilst supporting wayfinding to both the Train Station and the Town Centre.

The principle of the proposed mural, as well as its compliance with the London and Local Plan, is therefore considered acceptable.

Heritage Assessment

The LB Richmond Upon Thames validation requirements set out that a heritage statement is required if a proposal affects designated and/or non-designated heritage assets or their setting, and if the property is within a Conservation Area. As noted in Section B of this covering letter, the Site is not within a Conservation Area, and therefore on this basis, a Heritage Statement is not required.

In relation to the surrounding heritage assets, the townscape views are minimal given the shielding of other buildings close by. There would be no harm, and if anything, a betterment.

Due to the positioning of Regal House and the southern elevation, many of the surrounding Listed Buildings are shielded from the site by other nearby buildings and trees. There would only be very minor glimpses at specific moments from the following Listed Buildings:

Barclays Bank, Grade II Listed

- K6 Telephone Kiosk Junction of King Street and Water Lane, Grade II Listed

Local Plan Policy LP3 sets out that the Council will require development proposals to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough.

The existing building holds significant presence on the street scene, however, is blank and uninviting, resulting in a neutral contribution to the character and appearance to the surrounding townscape. The proposed mural therefore offers opportunity to provide an overall betterment to the surrounding context, adding character and interest to the townscape. The proposal would therefore have no harmful impact to surrounding heritage assets, and is supported by Local Plan Policy LP3.

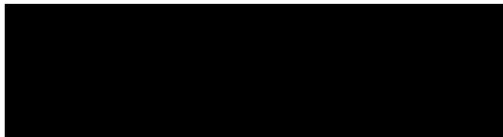
f. Conclusion

The Applicant is pleased to submit this planning application to the Council, delivering a new high-quality piece of public art that would be viewed by a wide range of residents, workers and visitors within the London Borough Richmond Upon Thames.

The Applicant is excited to deliver this mural, with its unveiling taking place on 8th March 2025, and looks forward to working with the Council to allow this objective to be realised.



Yours faithfully,



ICENI PROJECTS LTD