

22 December 2020

REDEVELOPMENT OF THE SITE TO PROVIDE 610SQM OF COMMERCIAL SPACE (B1 USE CLASS) WITHIN EXISTING BUILDINGS OF TOWNSCAPE MERIT PLUS A NEW BUILD UNIT, 24 RESIDENTIAL UNITS IN TWO BLOCKS (5 X 1 BEDROOM FLATS, 12 X 2 BEDROOM FLATS AND 7 X 3 BEDROOM FLATS) AND ASSOCIATED CAR PARKING AND LANDSCAPING AND OTHER WORKS

AT

ARLINGTON WORKS, 23-27 ARLINGTON ROAD, TWICKENHAM TW1 2BB

PLANNING APPEAL

LPA REF : 18/2714/FUL

PINS REF: APP/L5810/W/20/3249153

PROOF OF EVIDENCE of CHRISTOPHER HOWE APPENDICES

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Appendix A

Reduced set of appeal proposal drawings (CDF3-CDF13).



Car Parking

Site PTAL: 3

Refuse and Recycling Storage

Cycle Storage

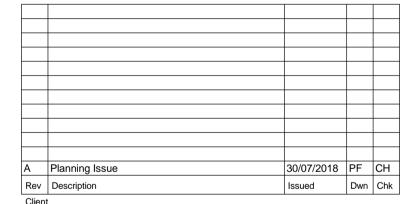
Level	Туре	GIA (m²)	GIA (ft²)
C1			
00 - Ground Floor	Office / Commercial	67 m ²	716 ft ²
01 - First Floor	Office / Commercial	67 m ²	716 ft ²
C2			
00 - Ground Floor	Office / Commercial	67 m²	720 ft ²
01 - First Floor	67 m²	720 ft ²	
C3			
01 - First Floor	Office / Commercial	67 m ²	716 ft ²
01 1110011001			
00 - Ground Floor	Office / Commercial	67 m²	716 ft ²
	Office / Commercial	67 m²	716 ft ²
00 - Ground Floor	Office / Commercial Office / Commercial	67 m ²	716 ft ² 725 ft ²
00 - Ground Floor			11.12.11
00 - Ground Floor C4 00 - Ground Floor	Office / Commercial	67 m ²	725 ft²
00 - Ground Floor C4 00 - Ground Floor 01 - First Floor	Office / Commercial	67 m ²	725 ft²
00 - Ground Floor C4 00 - Ground Floor 01 - First Floor C5	Office / Commercial Office / Commercial	67 m ² 67 m ²	725 ft ² 725 ft ²

Number	Туре	No beds	No persons	NSA (m²)	NSA (ft²)
Unit 1	Residential	2	3	74 m²	797 ft ²
Unit 2	Residential	2	3	62 m²	667 ft ²
Unit 3	Residential	2	3	62 m²	667 ft ²
Unit 4	Residential	1	2	51 m²	545 ft ²
Unit 5	Residential	3	4	76 m²	819 ft ²
Unit 6	Residential	3	4	76 m²	823 ft ²
Unit 7	Residential	1	2	51 m ²	545 ft ²
Unit 8	Residential	2	4	76 m²	822 ft ²
Unit 9	Residential	2	4	76 m²	822 ft ²
Unit 10	Residential	1	2	51 m ²	545 ft ²
Unit 11	Residential	3	4	76 m ²	819 ft ²
Unit 12	Residential	3	4	76 m²	823 ft ²
Unit 13	Residential	1	2	51 m²	545 ft ²
Unit 14	Residential	2	4	76 m²	822 ft ²
Unit 15	Residential	2	4	76 m ²	822 ft ²
Unit 16	Residential	1	2	51 m ²	545 ft ²
Unit 17	Residential	3	4	76 m ²	819 ft ²
Unit 18	Residential	2	3	72 m ²	776 ft ²
Unit 19	Residential	2	3	71 m²	769 ft ²
Unit 20	Residential	2	4	78 m ²	840 ft ²
Unit 21	Residential	2	3	62 m ²	672 ft ²
Unit 22	Residential	2	3	62 m ²	672 ft ²
Unit 23	Residential	3	4	101 m ²	1088 ft ²
Unit 24	Residential	3	4	101 m ²	1088 ft ²
Total Units: 24				1686 m²	18149 ft ²

Site Area Approx. 3030m²

All areas are approximate

PLANNING



Sharpe Refinery Service Ltd.

Redevelopment of: Arlington Works Twickenham TW1 2BB

PROPOSED Mixed Use Scheme Ground Floor Site Plan

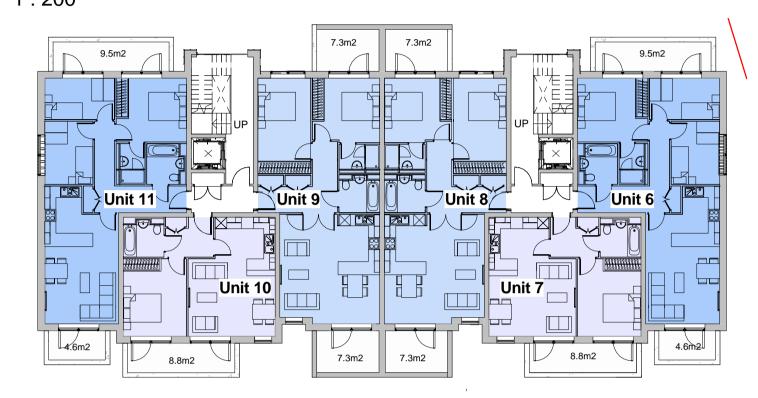
Date Drawn Checked CH 1:200@A1

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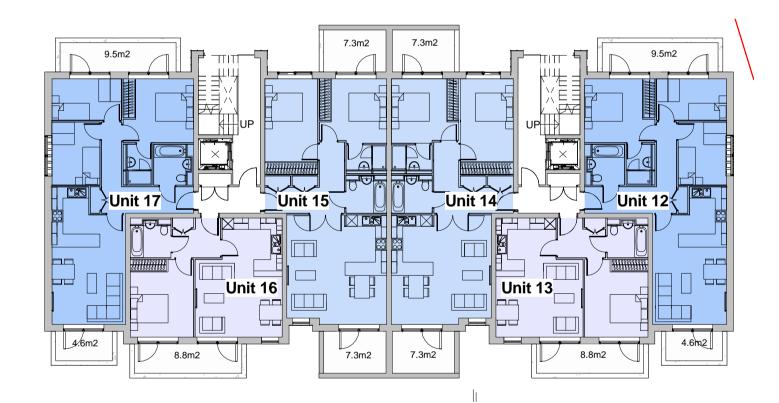
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Main Building - Ground Floor Plan

1: 200

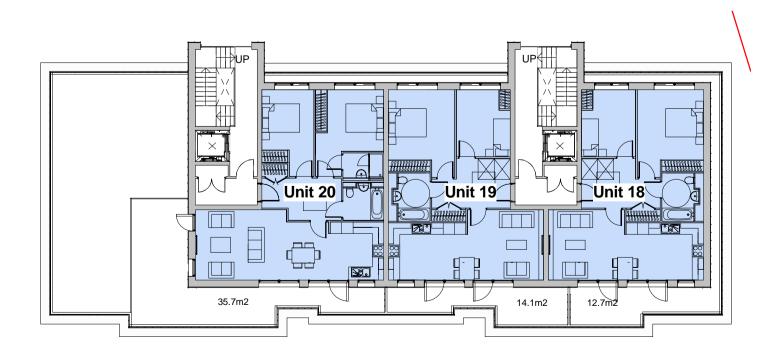


2 Main Building - First Floor Plan
1:200



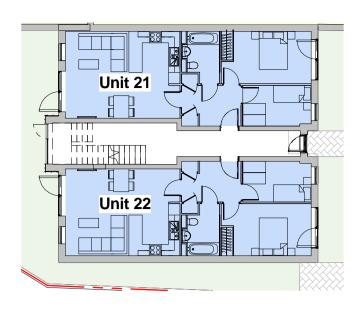
Main Building - Second Floor Plan

1:200

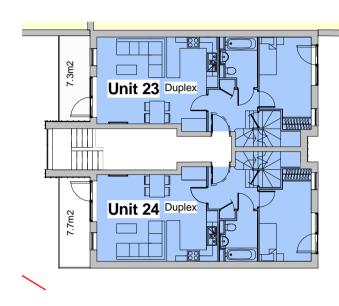


Main Building - Third Floor Plan

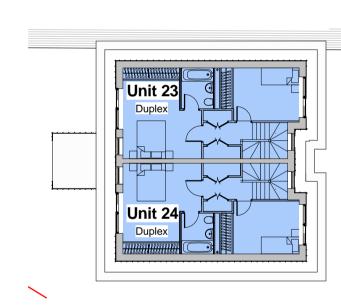
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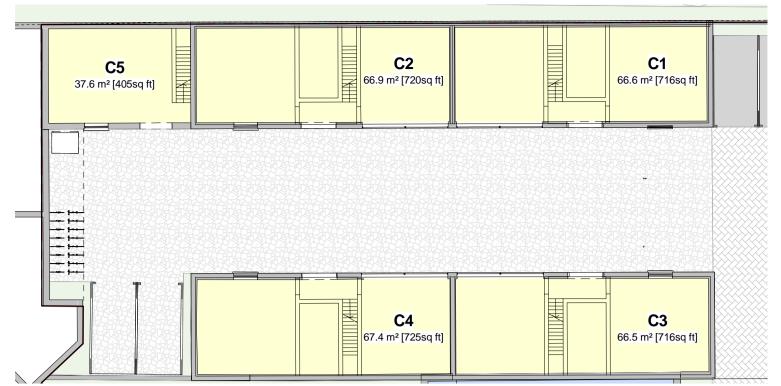
5 Small Block - Ground Floor Plan
1:200



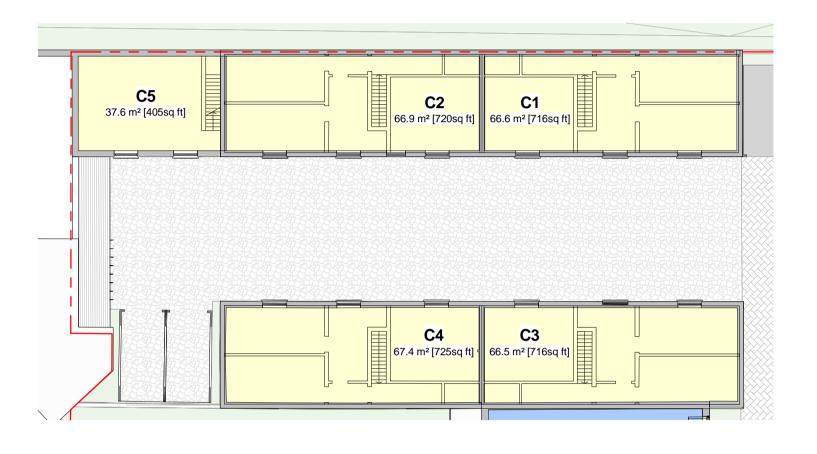
6 Small Block - First Floor Plan
1:200



7 Small Block - Second Floor Plan
1:200



8 B1 Commercial Units - Ground Floor Plan 1:200



9 B1 Commercial Units - First Floor Plan 1:200



Do not scale from this drawing

Number	Туре	No beds	No persons	NSA (m²)	NSA (ft²)
Unit 1	Residential	2	3	74 m²	797 ft ²
Unit 2	Residential	2	3	62 m²	667 ft ²
Unit 3	Residential	2	3	62 m²	667 ft ²
Unit 4	Residential	1	2	51 m²	545 ft ²
Unit 5	Residential	3	4	76 m²	819 ft ²
Unit 6	Residential	3	4	76 m²	823 ft ²
Unit 7	Residential	1	2	51 m²	545 ft ²
Unit 8	Residential	2	4	76 m²	822 ft ²
Unit 9	Residential	2	4	76 m²	822 ft ²
Unit 10	Residential	1	2	51 m²	545 ft ²
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Unit 15	Residential	2	4	76 m²	822 ft ²
Unit 16	Residential	1	2	51 m ²	545 ft ²
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Unit 22	Residential	2	3	62 m²	672 ft ²
Unit 23	Residential	3	4	101 m ²	1088 ft ²
Unit 24	Residential	3	4	101 m ²	1088 ft ²
Total Units: 24	·			1686 m²	18149 ft ²
	Area Sched	ule (Total Res	sidential GIA)		
GIA (m²) GIA (ft²)				A (ft²)	

All areas are approximate





Sharpe Refinery Service Ltd.

Redevelopment of: Arlington Works Twickenham TW1 2BB

PROPOSED Mixed Use Scheme Floor Plans

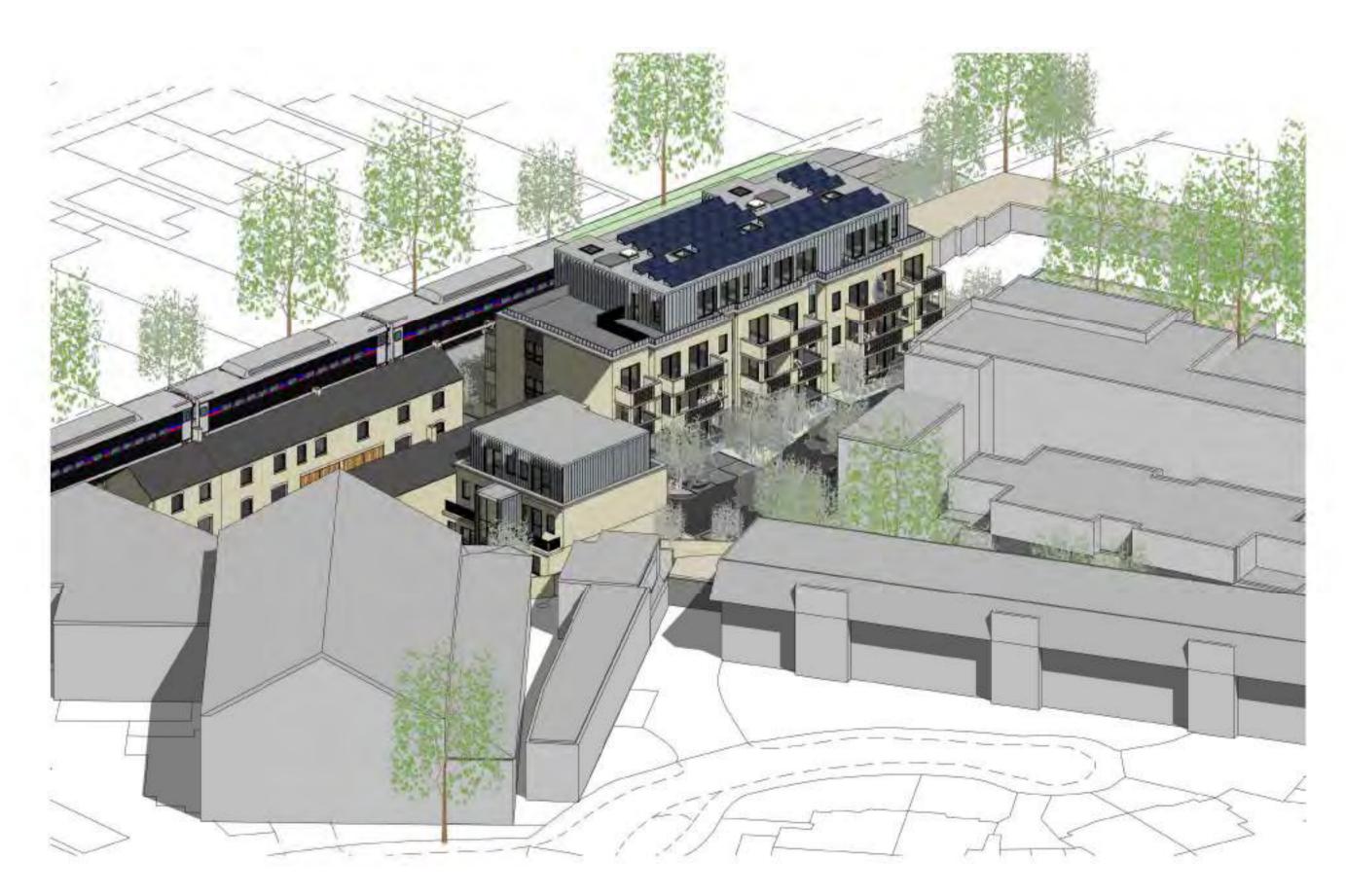
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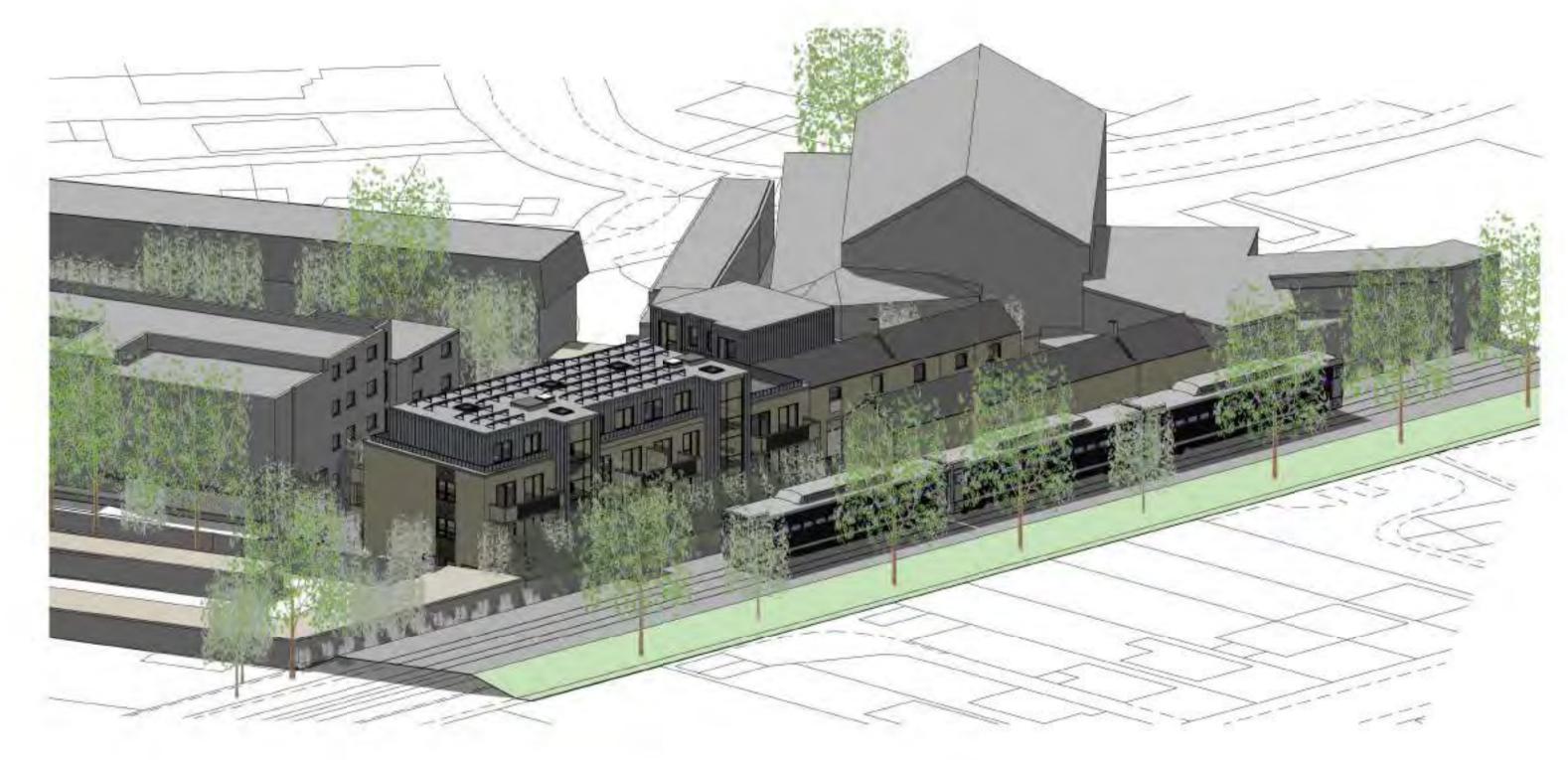
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1 3D - East - Proposed



3D - South - Proposed

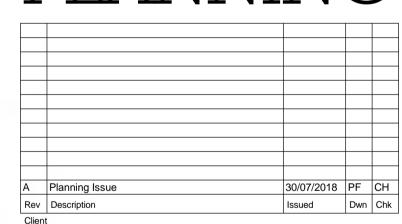


2 3D - North - Proposed



4 3D - West - Proposed

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Sharpe Refinery Service Ltd.

Redevelopment of: Arlington Works Twickenham TW1 2BB

PROPOSED
Mixed Use Scheme
Orthographic Views

Scale @A1

30/07/18 PF CH

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Perspective 1



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Sharpe Refinery Service Ltd.

Redevelopment of:
Arlington Works
Twickenham TW1 2BB

PROPOSED
Mixed Use Scheme
Perspective Views 1

Scale @A1

Date Drawn Checked PF CH

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1 Perspective 3





Perspective 5

PLANNING

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A	Planning Issue	30/07/2018	PF	CI
Rev	Description	Issued	Dwn	CI
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Redevelopment of: Arlington Works Twickenham TW1 2BB

PROPOSED
Mixed Use Scheme
Perspective Views 2

Scale @A1

30/07/18 PF CH

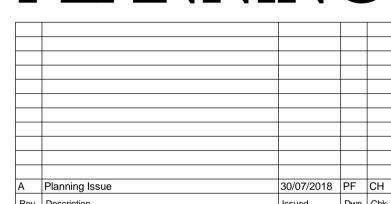
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Perspective 4





Date Drawn Checked CH

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1 Front Elevation
1:100



2 Rear Elevation
1:100



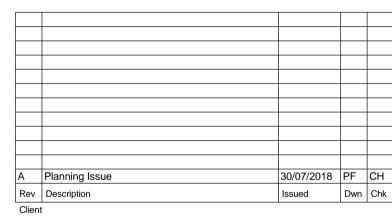
North East Elevation

1:100



4 South West Elevation
1:100

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Redevelopment of: Arlington Works Twickenham TW1 2BB

PROPOSED Mixed Use Scheme Elevations - Main Block

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1 Small Block - Front Elevation
1:100



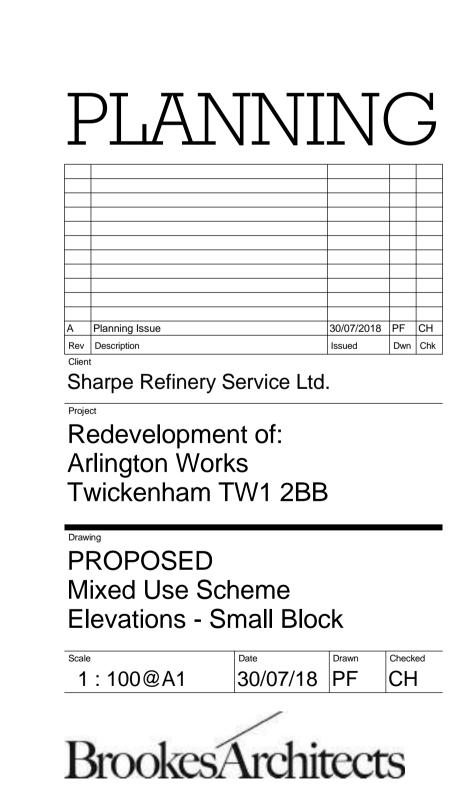
2 Small Block - Rear Elevation 1:100



3 Small Block - West Elevation



4 Small Block - East Elevation
1:100



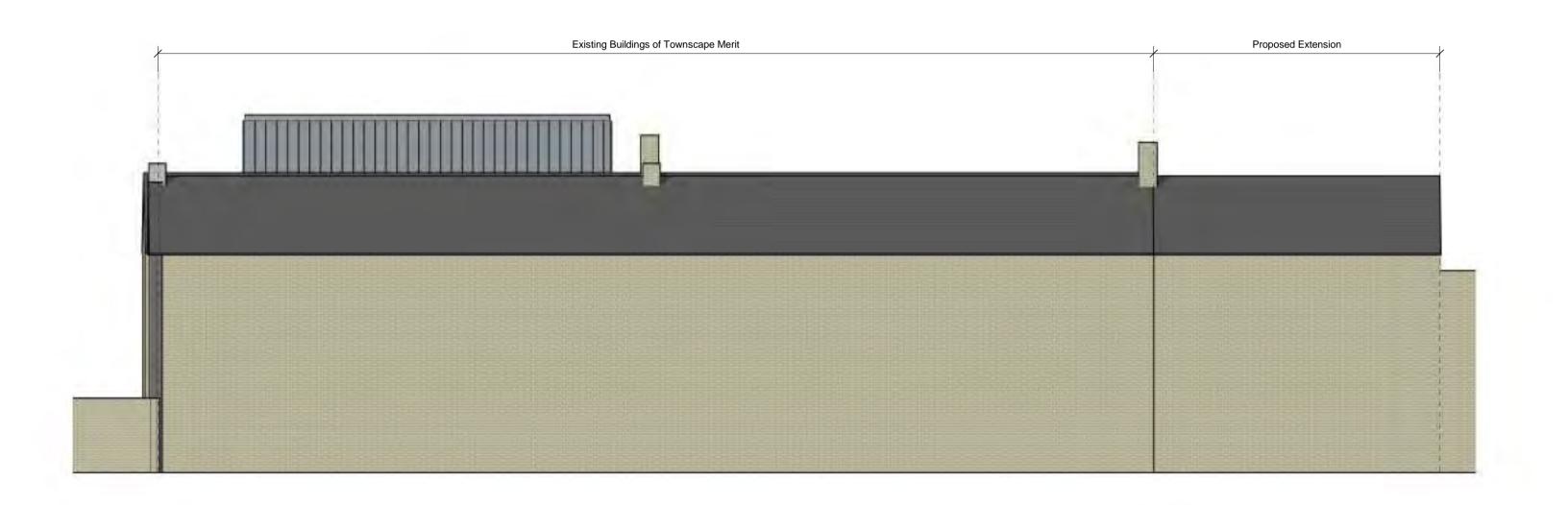
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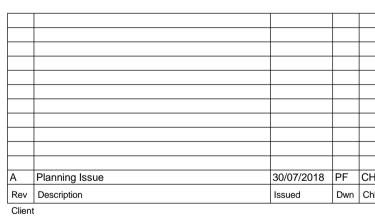


1 B1 Commercial Units 1, 2 + 5 - Front Elevation



2 B1 Commercial Units 1, 2 + 5 - Rear Elevation

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Redevelopment of: Arlington Works Twickenham TW1 2BB

PROPOSED Mixed Use Scheme Elevations - Office Units 1 - 4

 Scale
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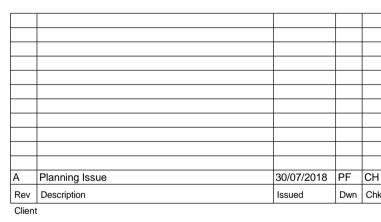


1 B1 Commercial Units 3 + 4 - Front Elevation



2 B1 Commercial Units 3 + 4 - Rear Elevation

PLANNING



Sharpe Refinery Service Ltd.

Redevelopment of: Arlington Works Twickenham TW1 2BB

PROPOSED Mixed Use Scheme Elevations - Office Units 5 - 7

 Scale
 Date
 Drawn
 Checked

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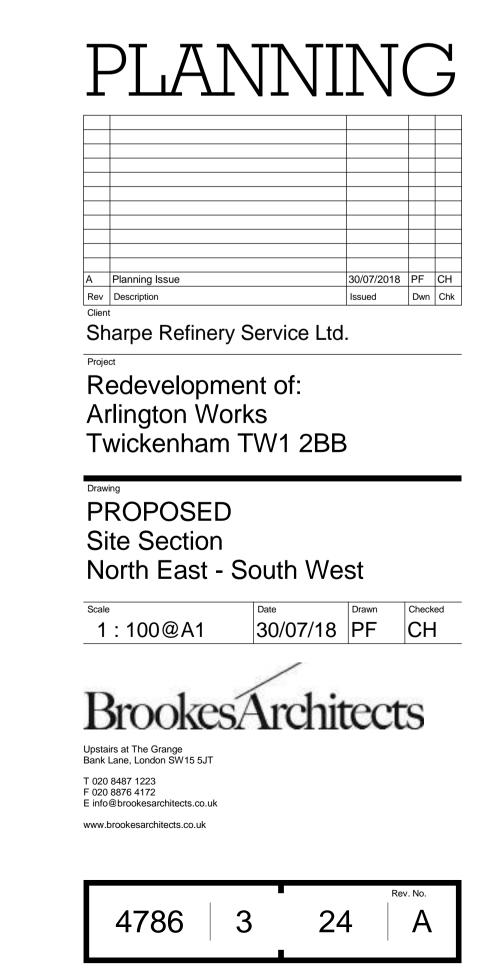
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Outline of previous scheme submitted for Pre-Application Advice



Pre-Application Comparative Elevation

1:100



Appendix B

Photographs of the appeal site



Panoramic view from north eastern (entrance) corner looking south west into the site



View from the middle of the site looking into the former stables courtyard



View from north side looking south west into the site



Elevated view of the oil recycling tank farm in the north western side of the site



Elevated view - south across the site



View south across the site



Image showing the oil recycling operation



View southward across the former stable yard



Telecommunication equipment in former stable yard



Eastern former stable terrace



View northwards across the former stable yard to the tank farm beyond

Appendix C

Photographs of the local and site context



Twickenham Studios - building frontage



Twickenham Studios - buildings to the south of the site boundary



Twickenham Studios - view from The Barons looking north towards the site



Twickenham Studios - Sound Centre to the east boundary of the site. Existing worksheds prepared for demolition



Apartment block to the western side of Arlington Road



Apartment block to the western side of Arlington Road



Apartment block to the western side of Arlington Road



Apartment context on the western side of Arlington Road



Flat context on the northern side of Arlington Road adjacent to the site entrance

Appendix D

Extract from LBRUT pre-application advice response letter dated 12 February 2018

- 2. Retain similar spacing between new buildings to any established spacing;
- 3. Retain appropriate garden space for adjacent dwellings;
- 4. Respect the local context, in accordance with policy LP 2 Building Heights;
- 5. Enhance the street frontage (where applicable) taking account of local character;
- 6. Incorporate or reflect materials and detailing on existing dwellings, in accordance with policy LP 1 Local Character and Design Quality;
- 7. Retain or re-provide features important to character, appearance or wildlife, in accordance with policy LP 16 Trees and Landscape;
- 8. Result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens, in accordance with policy LP 8 Amenity and Living Conditions;
- 9. Provide adequate servicing, recycling and refuse storage as well as cycle parking;
- 10. Result in no adverse impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.

In considering backland schemes, regard will be had to density and dwelling type, the London Plan Density Matrix and public transport accessibility.

Character Design & Layout

No issues with the principle of redevelopment with the retention of the existing BTM (2 buildings). The existing jumble of industrial structures are not a very positive visual feature from the railway line.

The NPPF attaches great importance to the design of the built environment, stating that good design is a key aspect of sustainable development and should contribute positively to making places better for people. It stresses the need to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings and smaller developments. Whilst it states that LPAs should not impose architectural styles or particular tastes, it reinforces that it is important to consider local character and distinctiveness.

Policies CP7 and DM DC1 of the Council's adopted Development Plan are consistent with the aims of the aforementioned statements. Policy DM DC1 states that new development must be inclusive, respect local character, including the nature of a particular road, and connect with, and contribute positively to, its surroundings based on a thorough understanding of the site and its surroundings. The thrust of the above policy is carried forward within emerging Policy LP1 of the publication version of the Local Plan.

As noted in the above chapters, the surrounding area comprises a range of land uses and building typologies. Buildings within the area general locality range from single to 5 storeys. The site itself is situated to the rear of buildings associated with the Twickenham Film Studios and would be accessed by way of an existing driveway from Arlington Road. Due to its rear siting, it would be considered unlikely that any future development would be visible from the Arlington Road streetscene. Notwithstanding this, the rear of the property has frontage to a railway. The site contains two locally listed Buildings of Townscape Merit (BTM) which would be retained and re-used as office use as part of the proposed scheme.

The proposals include the construction of a 'main building' comprising 2 levels and a double mansard roof. Noting the form and proportions of the double mansard, this building would be considered as comprising 4 storeys. Similarly, a 'small block' is proposed which would comprise 2 storeys and an additional large single mansard. Again, due to the form and proportions of the mansard roof, this building would also be considered as comprising 3 storeys. Whilst the proposed heights would be similar to other existing properties within the local area, the scheme due to its rear siting would be highly visible from the railway line. The views to and from St Margarets/Twickenham Stations should therefore be appropriately considered as part of any formal submission. Despite being setback 3-4m from the shared boundary with the railway, it would be considered that a 4 storey building at a length of approx. 36m would not be characteristic of development along this important approach route into St Margarets and Twickenham. This is therefore considered to be out-of-character with the grain of the area, and would not be supported. In addition to its bulk and scale, the proposal would include two excessively large common areas for stairway and lift access. This would result in a direct impact when viewed from the rail line by way of two approximately 4m wide

(22% of frontage) unarticulated service enclosures for the full height of the building. The proposed fenestration to these service enclosures would do little to enhance the appearance of the building when viewed from the railway, which would be considered as too bulky and uncharacteristic of the lower density nature of the approach route into St Margarets.

Concerns are raised in relation to the appearance of the double mansard roof, as it would result in an untypical top heavy look with a comparable height to the host building. The proposed height of, effectively 4 storeys, would fail to consider and relate to the scale of the BTM's and other surrounding development. Whilst it is acknowledged that some taller blocks of flats exist in Arlington Road, these are generally on larger footprints with fewer constraints for larger scale development. Council would consider that the loss of at least one level should be considered prior to submitting a formal application.

The proposed balconies would appear to provide sunlight access to dwellings, as well as allow for private amenity space for occupiers. However, it is noted that they would protrude from the front and rear elevation for nearly the full width of each façade. It would be considered that the balconies would therefore appear incongruous and dominate the appearance of the main building, particularly when viewed from the railway line. The type of balconies proposed would also further alienate the building from the characteristics of the adjacent BTM's. It would be considered that balconies that are set-in from the front and rear elevation would result in a greater relationship with the architectural characteristics of the BTM's and achieve greater consistency with Policies DM DC6 and LP8 which state that 'Balconies or terraces on roof of main buildings can be visually intrusive...' and that they should be 'designed to provide some shelter and privacy to neighbouring properties, either

by using screens or by setting the balcony back within the façade'.

The size of windows proposed would be considered as being excessively large and do not add to the visual interest of the main building. With regard to the front and rear elevations, windows ae generally in the form of sliding doors providing access to balconies. Given the size of the balconies, as well as the number of openings proposed, it would be considered that theses windows dominate the façade of the building. In addition, the double mansard windows are of a comparable size to those proposed on the levels below. It would be considered that they are not typical of a mansard window and add to the bulk and top heavy nature of the overall appearance of the building.

With reference to the 'small block', this would also need to better relate to the form and proportions of the existing adjacent BTM's. Whilst this building does not comprise a double mansard, it would be considered that its roof height, form, scale, bulk and mass of a would appear overbearing and dominate the adjacent BTM's. A flat or significantly lower mansard roof would therefore be considered more appropriate for this building, given its context. Similar objections would be raised in relation to the proposed fenestration, which would appear too large on all elevations and the mansard roof. Whilst the use of glazing bars would add some interest to the front and rear elevations, window sizes should be reduced as part of a revised scheme. The submitted drawings do not reference materials, but Council would discourage the use of unsustainable materials, such as uPVC, particularly noting the traditional architectural features present at the adjacent BTM's.

The submitted Design and Access Statement makes reference to the London Plan's Density Matrix, noting the sites Public Transport Accessibility Level (PTAL) rating of 3, size and surrounding context. The schemes compliance with the Density Matrix would not be disputed by Council noting the site could be considered as being within an urban setting and the proposed number of dwellings is far less than the suggested 70-170. Notwithstanding this, it would be considered that the London Plan's Density Matrix should be used as guidance to inform densities across London generally. It does not consider specific site constraints, or compliance with relevant local policies. On this basis, whilst consistent with the guidance with the London Plan's Density Matrix is achieved, for the reasons outlined above and within this report it would be considered that the current scheme would represent an over development of the site.

Policies DM OS6 and LP31 require the provision of open space with the aim of striking a balance between private, semi-private and public open space provision. An Open Space Assessment is

required in any future submission which demonstrates the hierarchy of open space and levels of public accessibility provided within the proposed development. The current scheme does not propose any public open space. Perimeter landscaping would not be considered sufficient to address policies DM 0S6 and LP31. It would also be considered that the site does not have quick or easy access to public open space within the surrounding area.

Views and Vistas

Policies DM HD7 and LP 5 state that the 'Council will protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area' and '... seek opportunities to create attractive new views and vistas and, where appropriate, improve any that have been obscured'.

A View Protected Line traverses the site in an east west direction. The site is also situated within a View Protected Indicative Zone protecting the views from near Ham House to Orleans House. Whilst it is noted that 4-5 storey buildings exist within the local area, it is currently unknown as to whether they are subject to the same protected view designations. Any formal application would therefore need to demonstrate that no harm would be caused to the wider views from Ham House and Orleans House. This would need to be demonstrated by way of computer-generated imagery (CGI) and visual impact assessments in order to satisfy the requirements of LP 5 and DM HD7.

Residential amenity

Policy DM DC5 states that in considering proposals for development, the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance. This is reiterated in Policy LP8.

It is noted that the subject site is situated adjacent to Twickenham Studios and a railway line. It would be considered that the site is somewhat tucked away from nearby residential properties and would therefore be unlikely to result in significant harm to the neighbouring amenities of occupiers within the surrounding area. Although the proposal would allow for overlooking to the rear of properties west of the railway line (fronting Heathcote Road) it is noted that the proposed buildings would be sited approximately 40m from the rear elevation of those dwellings. It would therefore be considered unlikely that any detrimental impacts to the privacy of occupiers of those dwellings would occur.

In addition, the siting of buildings proposed would be arranged in a manner that would ensure that it would be unlikely for significant harm to occur to future occupiers of the indicative scheme.

In light of the above, Council would not raise any in-principle objections to the current proposal based on loss of privacy and/or access to daylight.

Transport and Highway Safety

Car parking

Policies DM TP8 and LP45 outline that developments must demonstrate an appropriate level of offstreet parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions. It is further stated that in areas with a low PTAL rating (1-4), it is particularly important that parking standards are met. The site has a PTAL level of 3 which denotes a moderate accessibility to public transport. The parking requirements of the site need to be provided in accordance with the Parking Standards set out in Appendix 4 of the DMP, including refuse vehicle access across the scheme.

The parking spaces proposed include 1 space for every 1 and 2 bedroom unit and 1.5 spaces per 3 bedroom unit. A total of 25 parking spaces would have been proposed for the residential element of the scheme, which would be 1 less than the 26 required. A further 2 parking spaces would be proposed for the commercial units. Submitted drawings also indicate that a total of 2 disabled/accessible parking spaces would be provided with the proposed scheme. Whilst these figures appear broadly consistent with policy requirements, further clarification would be required prior to the submission of a formal planning application with regards to the types of commercial uses

Appendix E

Extracts from East Twickenham Village Planning Guidance SPD (CDC3/CDC10)

EAST TWICKENHAM

Village Planning Guidance

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I. Introduction

The purpose of this Village Planning
Guidance Supplementary Planning
Document (SPD) is primarily to establish
a vision and planning policy aims for,
and assist in defining, maintaining
and enhancing the character of East
Twickenham, and to provide guidance in
this regard. The SPD forms part of the
wider Village Plan.

By identifying key features of the village, the SPD clarifies the most important aspects and features that contribute to local character to guide those seeking to make changes to their properties or to develop new properties in the area, as well as being a material consideration in determining planning applications.

The core of this SPD is a series of character area assessments for the component areas of East Twickenham. These character areas have been identified through the similarity of key features that are deemed to define their individual local character. The assessments establish dominant features and materials as well as an overall description of the street pattern and housing types.

The London Borough of Richmond upon Thames has been divided into a series of smaller village areas. Each village is distinctive in terms of the community, facilities and local character – as are many sub areas within the villages.

The villages of the London Borough Richmond upon Thames are attractive with many listed buildings and conservation areas, the local character of each being unique, recognisable and important to the community and to the aesthetic of the borough as a whole.



East Twickenham SPD Area Boundary

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The boundary for the SPD is based on:

- a review of how each area's design characteristics can best be grouped;
- taking account of physical and administrative boundaries, including conservation area boundaries to avoid these being split between village areas; and
- how local communities viewed their local areas when asked through the Council's 2010 'All-In-One' survey and subsequent consultations.

This SPD has been produced by the Council working closely with the community. This has ensured that local residents, businesses and stakeholders have been genuinely involved in defining the important features — as well as the opportunities and threats — that define their local area.

The community has been involved through:

- 'Drop in sessions' held at Twickenham Studios on the 16th May 2015
- A resident walkabout held on the 17th May 2015
- Online questionnaire consultation (from 15th May and 29th June 2015)
- Stakeholder Workshop (20 July 2015, The Turks Head, St Margarets)
- Online consultation and questionnaire from 9 October – 20 November 2015 (statutory consultation)

Drop-In' session at Twickenham Studios
 October 2015

Wider Context (Village Plans)

Village Plans have been developed for each of Richmond's 14 villages. Each Village Plan describes a vision for the village area and identifies what the Council will do and what local people can do to achieve the vision together. It sets out the key issues and priorities and provides background information on the village area. The Village Plans are maintained on the Council's website and are updated as works are progressed. They cover a wide range of topics, including matters not within the remit of the SPD.

This Village Planning Guidance SPD forms part of the Village Plan by providing a formal planning policy document which can be used to guide new development that has responded to residents' desire to have greater control and influence over planning and development decisions in their local area. The involvement of the local community in the production of the SPD has been essential in ensuring it is a genuine reflection of residents' priorities.



Resident instations



Drop in event

2. Planning Policy and Wider Context

2.1 Planning Policy Framework

National Planning Policy

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is a key part of the Government's reforms to make the planning system less complex and more accessible. The NPPF provides the context for local planning authorities and decision takers, both when drawing up plans and making decisions about planning applications. It must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.

Regional Planning Policy

At a regional level, the London Plan FALP (adopted in 2015) is the overall strategic plan for London setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. This document has been adopted to ensure that a longer-term view of London's development is taken when producing local plans, making planning decisions and investing in infrastructure.

Policy 7.29 in the London Plan refers to the Thames Policy Area stating that relevant boroughs, including Richmond, must designate a Thames Policy Area in their Development Plan Documents. The boroughs must define the boundaries by taking into account proximity to the Thames, contiguous areas with clear visual links between areas and buildings and the river and specific geographical features, areas and buildings which relate or link to the Thames. The River Thames section of East Twickenham is designated in the Thames Policy Area in the London Plan.

Local Planning Policy

The London Borough of Richmond upon Thames current statutory planning policy framework is set out in adopted Plans including the Core Strategy, adopted in April 2009, and the Development Management Plan, adopted in November 2011. There is an online proposals map and a range of guidance provided through Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPG) for the area. This SPD forms part of the planning policy framework and should be read in conjunction with the Council's suite of planning policy and guidance as applicable. There is also a range of evidence base studies that the Council has undertaken which help to guide policy making.

The Council is currently moving forward on allocating larger development sites as part of its Local Plan-making processes. A larger site in East Twickenham has been identified through consultations undertaken by the Council. This has been assessed in Chapter 8 of this document to establish design objectives should it come forward for development.

Up-to-date information on the Council's Local Plan can be viewed at http://www.richmond.gov.uk/home/services/ planning/planning policy/local plan.htm.

2.2 Key Planning Policies

SPDs cannot create new policies but expand on policies set out in higher plans, notably the Core Strategy (C5) and the Development Management Plan (DMP). This SPD relates to a considerable number of higher policies, notably:

DMP Policy DM DC I Design Quality

New development must be of a high architectural and urban design quality based on sustainable design principles. Development must be inclusive, respect local character including the nature of a particular road, and connect with, and contribute positively, to its surrounding based on a thorough understanding of the site and its context.

In assessing the design quality of a proposal the Council will have regard to the following:



- compatibility with local character including relationship to existing cownscape
- · frontages, scale, height, massing, proportions and form
- sustainable development and adaptability, subject to aesthetic considerations
- layout and access
- space between buildings and relationship to the public realm
- detailing and materials

Whilst all adopted policies are applicable, those of particular relevance are:

CS Policy CP7: Maintaining and Improving the Local Environment

All new development should recognise distinctive local character and contribute to creating places of a high architectural and urban design quality that are well used and valued. Proposals will have to illustrate that

- (i) are based on an analysis and understanding of the Borough's development patterns, features and views, public transport accessibility and maintaining appropriate levels of amenity:
- (ii) connect positively with their surroundings to create safe and inclusive places through the use of good design principles including layout, form, scale, materials, natural surveillance

and orientation, and sustainable construction.

CS Policy CP8: Town and Local Centres

Retail and town centre uses will be supported providing that it is appropriate to the role in the hierarchy of the centres, and respects the character, environment and historical interest of the area.

CS Policy CP11 River Thames Corridor

The natural and built environment and the unique historic landscape of the River Thames corridor within the Borough will be protected and enhanced.

CS Policy CP13 Opportunities for All

The Council will work with all relevant agencies to reduce disadvantage, particularly in the most deprived areas of the Borough and for disadvantaged individuals, and ensure that a range of opportunities are provided that can be accessed by all residents.

DMP Policy DM OS 4 Historic Parks, Gardens and Landscapes

Parks and gardens as well as landscapes of special historic interest included in the Register compiled by English Heritage and other historic parks, gardens and landscapes will be protected and enhanced.

DMP Policy DM HD 1 Conservation Areas designation, protection and enhancement.

Buildings or parts of buildings, street turniture, trees and other features which make a positive contribution to the character, appearance or significance of the area should be retained.

DMP Policy DM HD 2 Conservation of Listed Buildings and Scheduled Ancient Monuments

Preservation of Listed Buildings of special architectural or historic interest and Ancient Monuments and seek to ensure that they are kept in a good state of repair.

DMP Policy DM HD 3 Buildings of Townscape Merit

Preservation and enhancement of Buildings of Townscape Meric The Council will use its powers where possible to protect their significance, character and setting

DMP Policy DM TP 9 Forecourt Parking

The parking of vehicles in existing front gardens will be discouraged, especially where:

- this would result in the removal of architectural features such as walls, gates and paving, or of existing trees and other vegetation:
- where such parking would detract from the streetscape or setting of the property; or

 it has an impact on the surrounding environment both in terms of the loss of individual front gardens and in damaging the unity and character of groups of houses and the streetscape in general.

Policy DM OS 11 Thames Policy Area

The special character of the Thames Policy Area (TPA), as identified on the Proposals Map, will be protected and enhanced by ensuring development establishes a relationship with the river and takes full advantage of its location.

Policy DM DC 7 Shop fronts and shop signs

The Council will resist the removal of shop fronts of architectural or historic interest. The Council will expect proposals for new shop fronts or alterations to existing shop fronts to demonstrate a high quality of design, which complements the original design, proportions, materials and detailing of the shop front, surrounding streetscene and the building of which it forms part.

A wider list of relevant policies can be found in Appendix 1. It should be noted that all adopted policies and guidance should be assessed for their relevance in respect of individual planning applications, not just those referred to above.

2.3 Planning Policy Aims

This SPD reinforces the existing planning policy aims which have been established for East Twickenham which seek to achieve the following:

- Protect and enhance the local shopping parades on Richmond Road.
- Ensure local character and historic buildings and features are retained and enhanced particularly in the conservation areas at Twickenham Park. Beresford Avenue, Richmond Road, Cambridge Park, Richmond Hill and Richmond Riverside (East Twickenham side).
- Preserve and enhance the towpath including the Riverside views and the related public open spaces.
- Prevent any increase in unsightly car parking in front gardens where possible through planning powers and through design guidance.
- Ensure that new development is appropriate in terms of scale and materials and includes sufficient car parking.
- Ensure that grass verges, street trees and other vegetation are retained,

- Protect and enhance sites of nature conservation importance.
- Reduce the impact of through traffic and congestion.

3. Spatial Context

This section covers transport, green spaces, shops and services which are an essential part of the village's character. These are detailed below and, together with its historic assets, are mapped on the following pages:

Facilities in East Twickenham

- Shopping is focused along Richmond Road. Residents can also access the shops in St Margarets / Crown Road and central Richmond.
- Twickenham Park Surgery located on Rosslyn Road.
- St Stephens Church on Richmond Road.
- The A3004, Richmond Road and workshops located off Arlington Road support the majority of employment opportunities in the area.
- Cambridge Park Bowling and Sports Club.
- Richmond Tennis Centre,

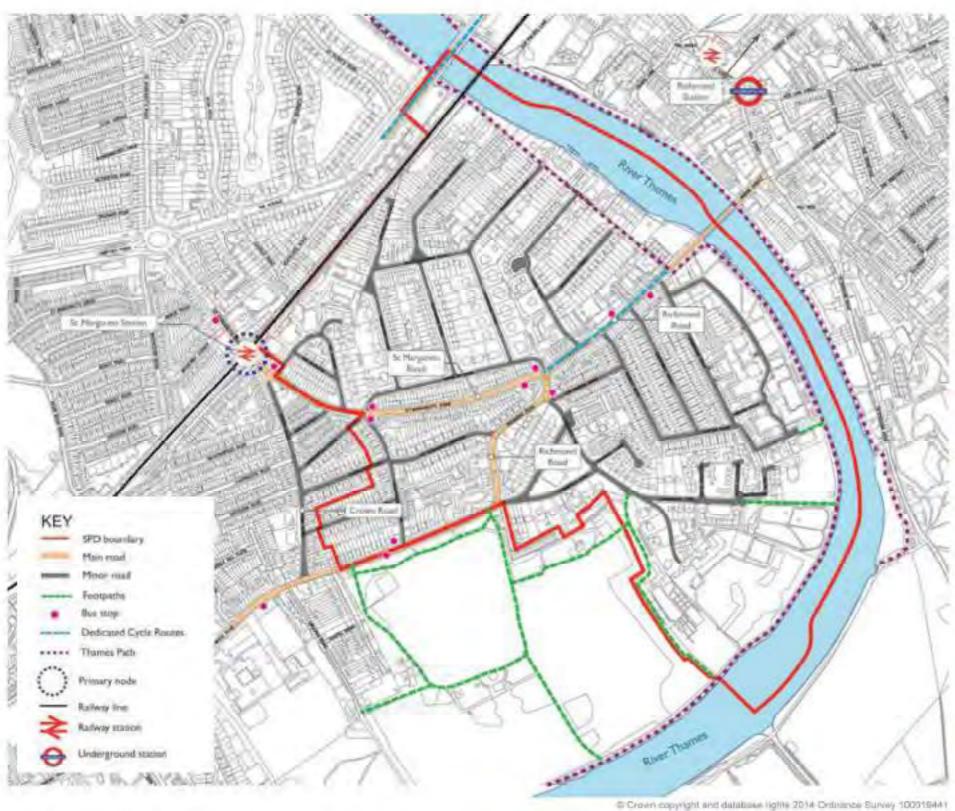
Connectivity and accessibility

- Rail services at St. Margarets Station. The area is also relatively close to Richmond Station which provides for Overground, Underground and National Rail Services.
- Main roads running through the area include Richmond Road and St Margarets Road, which runs past St Margarets istation (which lies just outside the SPD boundary).
- A number of bus services run along St Margarets Road and Richmond Road.
- A range of cycling routes including the main road cycle routes and quieter routes including some off-road.

Green Infrastructure

- The river frontage is within protected Metropolitan Open Land.
- Meadowbank.
- Cambridge Gardens, which has a cafe and is home to the annual East Twickenham Fain
- Warren Gardens.
- Duck's Walk and access to the river.

Connectivity and Accessibility in East Twickenham

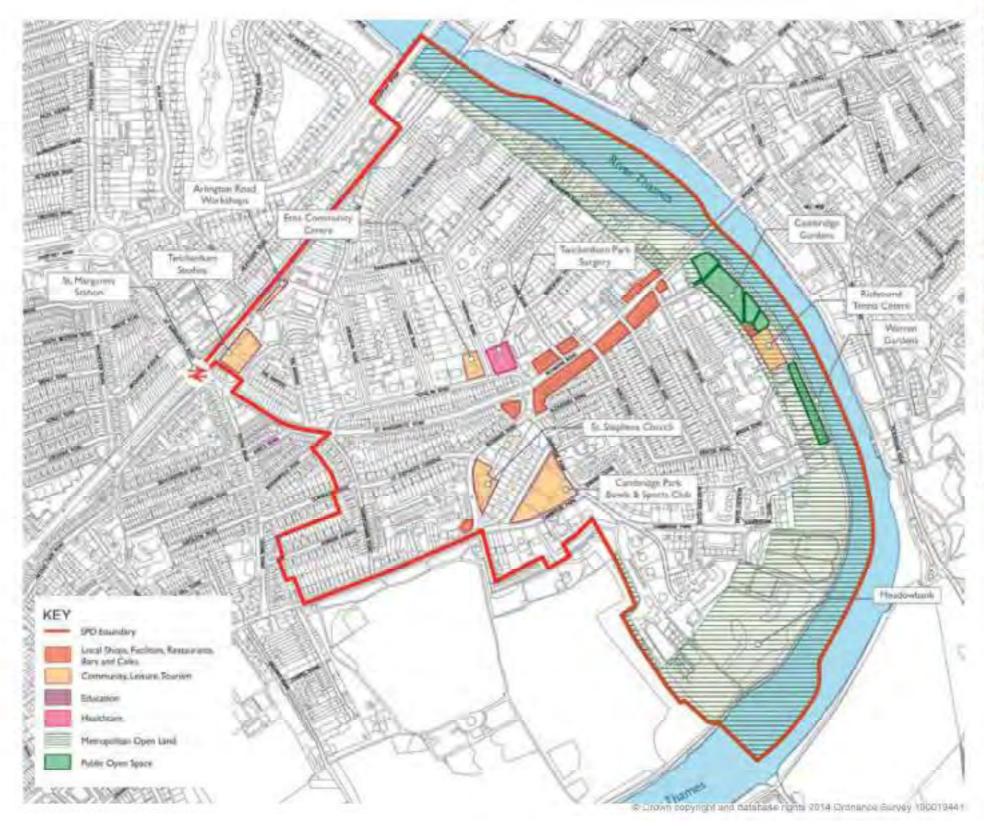








Facilities in East Twickenham



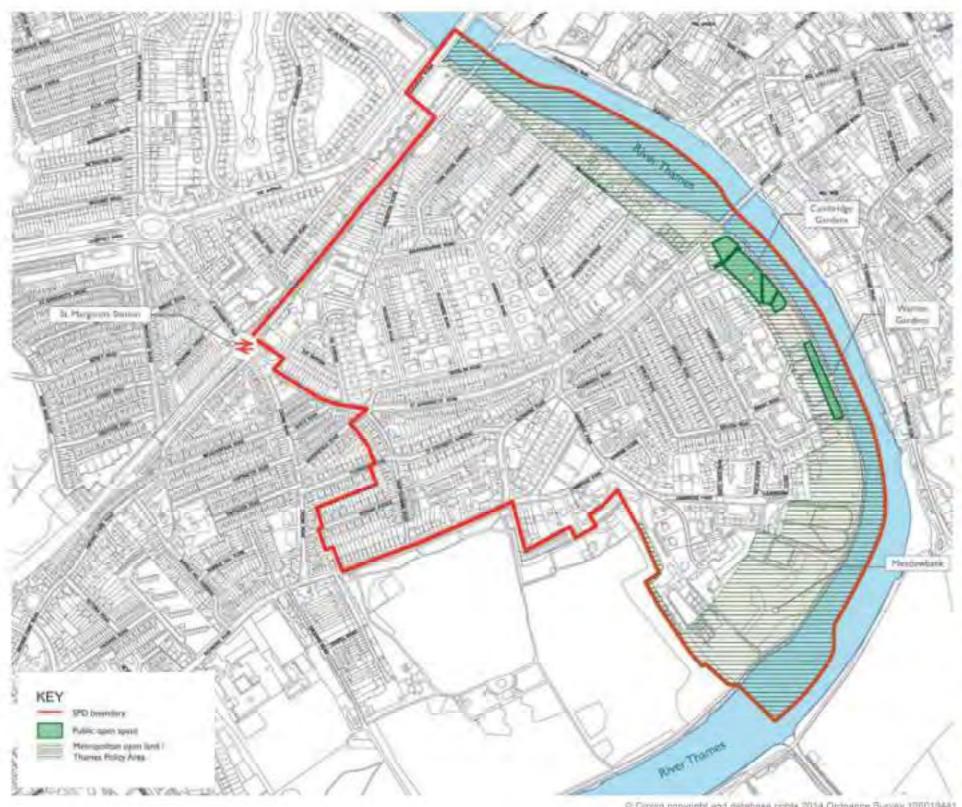


8t Stephens Church



Twickenham Park Surgery

Green Infrastructure in East Twickenham



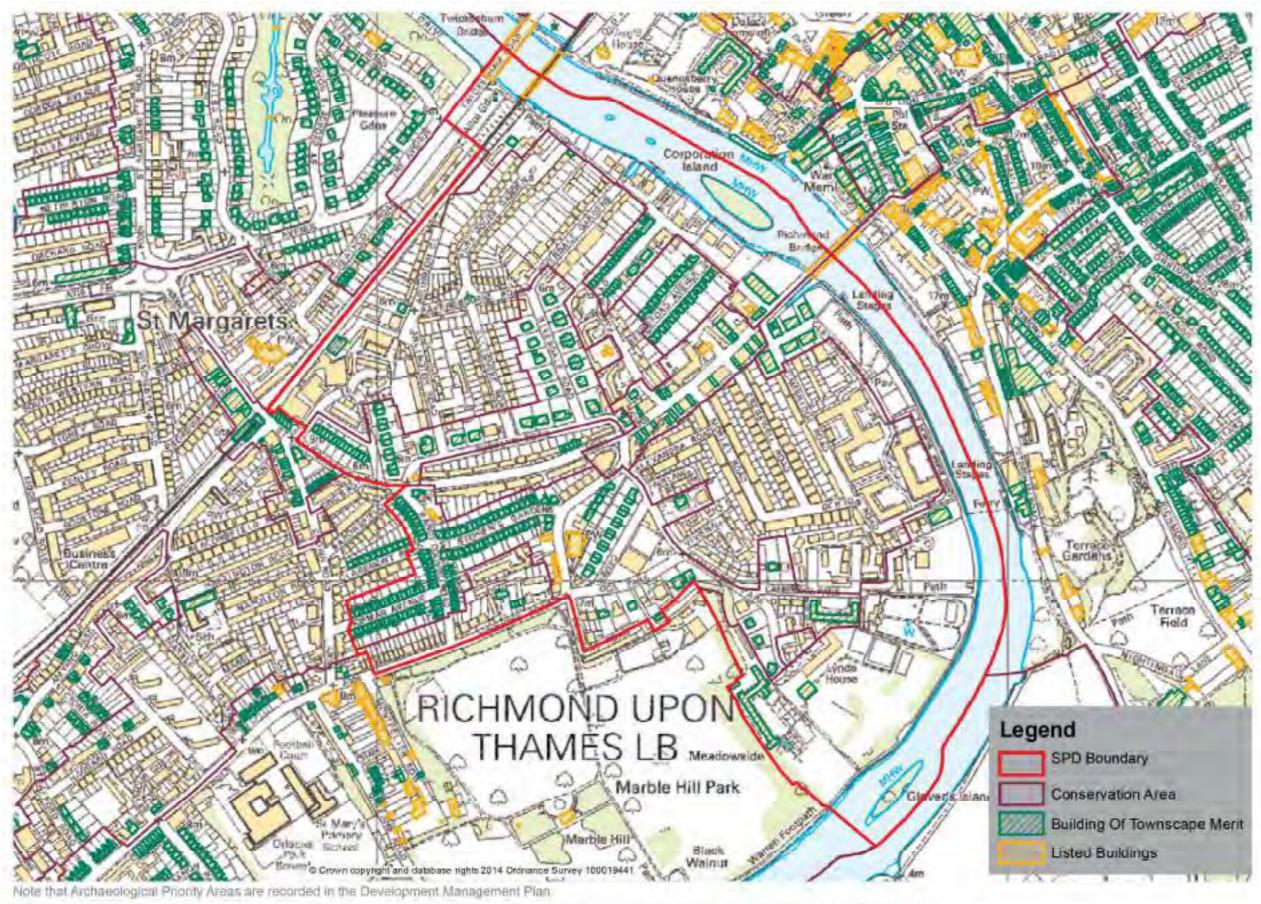






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Historic Assets in East Twickenham



Buildings Of Townscape Merit are not designated and are locally listed. Listed Buildings are designated and recognised nationally. Please note that these are correct at the time of adoption of the SPD. For the most up to date information please see the Council's website.

4. Vision for East Twickenham

The vision for East Twickenham is to maintain the attractive residential character and to ensure that the shopping centre continues to thrive.

The area of East Twickenham is located within a bend in the River Thames. The streets around the local shopping centre form a picturesque and leafy landscape containing many fine Victorian and Edwardian villas and interwar homes.

The River and related open spaces at Miradowhank and Cambridge Gardens are extremely attractive while Richmond Bridge is a historic feature. The towpath generally has a rural character with stunning views.

The local shopping parade in East Twickenham can be found along Richmond Road.

The vision is based on maintaining the character of the area as an attractive residential area; ensuring East Twickenham's shopping centre continues to provide a range of shops and services for residents and visitors; that the towpath and Duck's Walk (which provides a trucial link) and open spaces are maintained and enhanced where opportunity arises.

The Twickenham Studios are important to the character of the area and the Council's economic strategy and the vision is based on the retention of studio use on the site.

The vision recognises the potential for sensitive redevelopment of Ryde House, which is a vacant 1980s office building on the north side of Richmond Road, for educational and retail uses

The impact of through traffic will be reduced where possible and parking managed to allow residents to access local facilities and enjoy nearby open areas and the riverside.

5. Objectives

The East Twickenham Village Planning Guidance SPD has been developed to meet the following objectives, which correspond to those in the Council's Design Quality SPD.

Identify local character – to identify local character and historic assets for enhancement or protection.

Promote high standards of design through high quality illustrative material and simple guidance and advice to local residents and businesses.

Development Management – to set design guidelines for householders, developers and the Council (In relation to public realm) to encourage high quality development and, if possible, avoid the need to refuse development proposals.

Implementation of schemes – to provide advice for householders and businesses that will help them achieve repairs and modernisation which respects local character and where possible restore original details which have been lost during earlier modifications.

Design Review – to provide a framework for the Council to use in reviewing the effectiveness of planning and public realm decisions.

Local Policy Context - to identify those statutory policies (Core Strategy and Development Management Plan) which are essential to addressing local issues.

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6. Character Area Assessments

The identification of local character is one of the primary objectives of the SPD.

The character area assessments sub-divide the village into a smaller set of sub areas, some of which are further sub-divided.

Each area has been defined by grouping properties where a large proportion have similar characteristics, features and materials. These have been identified and recorded

A number of the areas included within this Section are adopted Conservation Areas. More information regarding Conservation Areas can be viewed at http://www.richmond.gov.uk/home/services/planning/conservation_areas.htm

Some areas are the subject of what is known as an Article 4 direction. These remove certain Permitted Development Rights from properties. This means that if you want to extend or alter your home in a way that would normally be allowed under permitted development you will need to apply for planning permission to do so. The fact that Permitted Development Rights have been removed does not automatically mean that planning permission will not be granted, but careful consideration will be given as to the effect that the proposal will have on the character and appearance of the local area. Information on Article 4 Directions can be viewed at http://www.richmond.gov.uk/ home/services/planning/conservation areas/ article 4 directions.htm

Citaractor Aria |: Park House Gardens

Conservation Area 2: Twickenham Park

Conservation Area 3: Beresford Avenue

Criminevation Area 4: Richmond Road

Character Area 5: South of Richmond Bridge

Character Are a 6: Cambridge Park Character Are a 7: Richmond Road opposite Marble Hill Park Character Area 8: St Margarets Road Conservation Area 9: Richmond Hill

(East Twickenham side)
Contervation Area 10: Richmond
Riverside (East Twickenham side)
Character Area 11: Ravensbourne
Road and surrounds



Character Area Plan

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Character Area 11:

Ravensbourne Road and surrounds

Character Summary

This area is part of the site of the former Twickenham Park which was developed with houses from the mid-nineteenth century. It is defined partly by the numerous Conservation Areas between the railway line to the north and St Margarets Road to the south. The character area is comprised of Arlington Close, the northern parts of Arlington Road, Ellesmere Road and the loop of The Barons.

Ellesmere Road / Ravenbourne Road (south side)

Ellesmere Road consists of large interwar detached houses displaying many of the typical features of this period including applied half-timbered gables and bay windows. The designs of the houses vary and the plots are large and green; although most households appear to use part of their front gardens for parking, they are often planted too, with some sections of the dwarf front walls retained. The pavements are wide and planted with large trees though the paving is a haphazard collection of materials. Parking is permitted on the pavements and on both sides of the road.

This area includes the houses on the south side of Ravensbourne Road between Ellesmere and Arlington Roads. These too are interwar houses but in short terraces with applied half-timbering on the first floors.

Arlington Road

The east side of Arlington Road is made up of semi-detached houses of a regular design with interpround-headed porches and rendered elevations. They appear to have originally had pebble-dash rendered facades which in many cases have been replaced with stucco. Many of the timber casement windows have been replaced with uPVC. The front boundary walls have not survived as well as those on Ellesmere Road; most front gardens have been

fully conversed to parking. On the west side are blocks of flats from the first half of the twentieth century. By and large, these are fairly unremarkable but some have attractive Deco detailing. One of these blocks is built of multi-coloured brick and is of an earlier date than the others. The ground floors of the flats are below street level, at the height of a normal basement. On the west side of this junction stands an attractive Victorian house built from gault brick.

This street also has wide pavements with tree lined streets, with the perception that they were originally laid out with grass verges that have been subsequently tarmacked over. The pavements here too are a haphazard mixture of materials.

Dominant Materials and Features

Characteristic materials and features include: Red brick, stock brick, render, pebbledash, clay files, applied half-timbering, chimneys, timber doors and timber casements with leaded lights, steel windows, projecting bays, chimneys, dwarf red brick front, garden walls, flat roofs, street trees.

The Barons

This area includes The Barons and the southern end of Arlington Close. Twickenham Studios forms much of the north western boundary of this area, running along the railway line. These are large, warehouse-type structures with a pebbledash wall that runs in front of them along The Barons. At the south end of Arlington Road is a four-story block of flats dating from c. 1970s.

The rest of The Barons is made up of three-storey flats, clearly of the same development, constructed c. 1930. Kelvin Drive is a small cul-de-sac which leads off The Barons at its north end; it also has flats with their brick facades and pantiled mansards, as well as two stuccoed houses. The flats have

retained their character and appear to contain original steel leaded windows and front garden areas.

Despite the industrial character of the Studios, these streets are tree lined and the studio buildings are not unduely prominent in the general streetscape.

Dominant Materials and Features

Characteristic materials and features include: Red brick, pantiles, steel leaded windows, hung tiles, chimneys, tree-lined streets.

Threats from Development

- Replacement of historic windows and doors with those of modern materials (uPVC) or designs that do not follow the original glazing pattern and opening style.
- Off road parking, particularly along parts of Arlington Road has a detrimental impact on the regularity of the street scene and its integrity.

Opportunities

- Improving the public realm including footpath renewal and reinstating grass verges where they have been tarmacked
- Improvement to the boundaries and areas adjacent to Twickenham Studios (see also St Margaret's SPD)
- Unattractive parking prevention methods along Arlington Road (bollards around green space) could be improved



The Barons



instructe Road



Teickenham Studjae

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Character Area 11: Revensbourne Road and surrounds

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Appendix I: Relevant Policies and Guidance

It should be noted that all adopted policies and guidance should be assessed for their relevance in respect of individual planning applications, not just those listed below.

LBRuT LDF Core Strategy (April 2009)

Main policies that the SPD will support

CP7: Maintaining and Improving the Local Environment

- 7.A Existing buildings and areas in the Borough of recognised high quality and historic interest will be protected from inappropriate development and enhanced sensitively, and opportunities will be taken to improve areas of poorer environmental quality, including within the areas of relative disadvantage of Castlenau, Ham, Hampton Nurserylands, Heathfield and Mortlake.
- 7.B All new development should recognise distinctive local character and contribute to creating places of a high architectural and urban design quality that are well used and valued. Proposals will have to illustrate that they:
 - are based on an analysis and understanding of the Borough's development patterns, features and views, public transport accessibility and maintaining appropriate levels of amenity;
 - (ii) connect positively with their surroundings to create safe and inclusive places through the use of good design principles including

layout, form, scale, materials, natural surveillance and orientation, and sustainable construction.

CP8: Town and Local Centres

8.A The Borough's town and local centres have an important role, providing shops, services, employment opportunities, housing and being a focus for community life.

Retail and town centre uses will be supported providing that it is appropriate to the role in the hierarchy of the centres, and respects the character, environment and historical interest of the area. It should be of an appropriate scale for the size of the centre and not adversely impact on the vitality and viability of any existing centre. Out of town retail development is not usually considered appropriate in this Borough in line with The London Plan consolidated with Alterations since 2004.

The Council will improve the local environment to provide centres which are comfortable, attractive and safe for all users. The historic environment and river frontage will be protected.

CP14 Housing Standards & Types

14.D The density of residential proposals should take into account the need to achieve the maximum intensity of use compatible with local context, while respecting the quality, character and amenity of established neighbourhoods and environmental and ecological policies. The London Plan consolidated with Alterations since 2004 Density Matrix and other policies will be taken into account to assess the density of proposals.

CP20 Visitors and Tourism

The Council will support the sustainable growth of the tourist industry, for the benefit of the local area by:

- 20.A Encouraging the enhancement of existing tourist attractions, such as Kew Gardens, Hampton Court Palace, Ham House and the River, including sport stadia particularly those of RFU and Harlequins;
- 20.B Promoting sustainable transport for tourists to and within the borough, including the passenger services along the Thames:
- 20.C Directing new hotels to the Borough's town centres or other areas highly accessible by public transport;
- 20.D Requiring accommodation and facilities to be accessible to all:
- Enhancing the environment in areas leading to and around tourist destinations.

Other relevant policies:

CP10: Open Land and Parks

The open environment will be protected and enhanced. In particular:

- 10.A The Borough's green belt, metropolitan open land and other open land of townscape importance, World Heritage Site (Royal Botanic Gardens, Kew), land on the Register of Parks and Gardens of Special Historic Interest, green chains and green corridors will be safeguarded and improved for biodiversity, sport and recreation and heritage, and for visual reasons.
- 10.B A number of additional areas of open land of townscape importance will be identified, which will be brought forward through the Development Allocations DPD.

CP17 Health and Well-being

- 17.A Health and well-being in the Borough is important and all new development should encourage and promote healthier communities and places.
- 17.B The provision of new or improved facilities for health and social care and other facilities will be supported. Such facilities should be in sustainable locations and accessible to all and priority will be given to those in areas of relative deprivation which

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are identified in Core Policy 13, an immediate need for primary health care facilities (especially doctor's surgeries) has been identified in Kew, Richmond, Whitton and Ham Sites for larger facilities may be identified in the Site Allocations DPD.

- 17.C A pattern of land use and facilities will be promoted to encourage walking, cycling, and leisure and recreation and play facilities to provide for a healthy lifestyle for all, including provisions for open and play space within new development as appropriate.
- 17.D Existing health, social care, leisure and recreation provision will be retained where these continue to meet or can be adapted to meet residents' needs. Land will be safeguarded for such uses where available, and the potential of re-using or redeveloping existing sites will be maximised.

LBRuT LDF Development Management Plan (November 2011)

Main policies that the SPDs will support:

Policy DMTC | Larger Town Centres

To maintain and improve the town centres, the Council will require appropriate development to take place within the identified Town Centre Boundaries of the five maintown centres. These are Richmond, the major centre, and the four district centres - Twickenham, East Sheen, Teddington and Whitton.

Proposals that contribute towards a suitable mix of uses will be approved, provided that they are appropriate to the function, character and scale of the centre. Acceptable town centre uses could include retail (if within or well related to designated frontages), business, leisure, tourism, community uses, health and residential development compatible with other development in the town centre.

Proposals will be acceptable within the Town Centre Boundaries if they:

- (f) Maintain or enhance the amount of active frontage, subject to Policy DMTC 3 'Retail Frontages'.
- (h) Respect and enhance the heritage, character and local distinctiveness of the centre.

Policy DMTC 2 Local and Neighbourhood Centres and Areas of Mixed Use

The Council will protect and improve the provision of day-to-day goods and services in the local and neighbourhood centres of the borough (See Policy DMTC 3 'Retail Frontages'). These centres are often designated as Areas of Mixed Use and are thus seen as appropriate for a mix of uses that meet primarily local needs.

Proposals for development will be acceptable in the smaller centres if they:

- (c) Respect and enhance the heritage, character and local distinctiveness of the centre, whilst making the most efficient use of land.
- (d) Include overall improvements and enhancements of the small centres; or modernise outmoded premises.

Development should improve and maintain commercial provision in the smaller centres, without significantly expanding it.

Policy DMTC 3 Retail Frontages

B Secondary Retail Frontages

Non-retail proposals will be acceptable in the secondary shopping frontages only if:

(b) The proposed use retains a "shop-like" appearance with an active frontage and will not have a detrimental visual impact on the shop-front and respect the

heritage and character of the centre.

Policy DM OS 3 Other Open Land of Townscape Importance

Other open areas that are of townscape importance will be protected and enhanced in open use.

It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria must be taken into account when assessing appropriate development:

- I. It must be linked to the functional use of the Other Open Land of Townscape Importance; or
- 2. It can only be a replacement or minor extension of existing built facilities;
- 3. In addition to 1, or 2, it does not harm the character and openness of the open

Improvement and enhancement of the openness and character of other open land and measures to open up views into and out of designated other open land will be encouraged where appropriate.

When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account.

The explanatory text is relevant to the SPD as set out below:

- 4.1.6 Other Open Land of Townscape Importance (OOLTI) can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. The designated areas are shown on the Proposals Map but there will also be other areas which could be considered as being of local value to the area and townscape which merit protection.
- 4.1.7 In some parts of the borough, open areas, including larger blocks of back gardens, which are not extensive enough to be defined as green belt or metropolitan open land, act as pockets of greenery of local rather than London-wide significance. Many of these are of townscape importance, contributing to the local character and are valued by residents as open spaces in the built up area. Policy DM HQ 2 'Infill Development' and Policy DM HO I Backland Development also recognise the importance of gardens. which will be considered as greenfield sites. Green pases are particularly important and will be protected in areas of high density development and town centres.
- 4 1.8 OOLTI should be predominantly open or natural in character. The following criteria are taken into account in defining OOLTI:

- Contribution to the local character and/ or street scene, by virtue of its size, position and quality.
- Value to local people for its presence and openness.
- Immediate or longer views into and out of the site, including from surrounding properties.
- Value for biodiversity and nature conservation.
- Note that the criteria are qualitative and not all need to be met.

Policy DM OS 4 Historic Parks, Gardens and Landscapes

Parks and gardens as well as landscapes of special historic interest included in the Register compiled by English Heritage and other historic parks, gardens and landscapes referred to in para 4.1.11 below, will be protected and enhanced. Proposals which have an adverse effect on the settings, views, and vistas to and from historic parks and gardens, will not be permitted.

Policy DM HD I Conservation Areas – designation, protection and enhancement

The Council will continue to protect areas of special significance by designating Conservation Areas and extensions to existing Conservation Areas using the criteria as set out in PPS 5 and as advised by English Heritage.

The Council will prepare a Conservation Area Appraisal and Management Plan for each Conservation area, these will be used as a basis when determining proposals within or where it would affect the setting of, Conservation Areas together with other policy guidance.

Buildings or parts of buildings, street furniture, trees and other features which make a positive contribution to the character, appearance or significance of the area should be retained. New development (or redevelopment) or other proposals should conserve and enhance the character and appearance of the area.

Policy DM HD 2 Conservation of Listed Buildings and Scheduled Ancient Monuments

The Council will require the preservation of Listed Buildings of special architectural or historic interest and Ancient Monuments and seek to ensure that they are kept in a good state of repair by the following means:

- consent would only be granted for the demolition of Grade II Listed Buildings in exceptional circumstances and for Grade II* and Grade I Listed Buildings in wholly exceptional circumstances following a thorough assessment of their significance;
- retention of the original use for which the listed building was built is preferred.
 Other uses will only be considered where the change of use can be justified, and where it can be proven that the original use cannot be sustained;
- alterations and extensions including partial demolitions should be based on an

accurate understanding of the significance of the asset including the structure, and respect the architectural character, historic fabric and detailing of the original building. With alterations, the Council will normally insist on the retention of the original structure, features, material and plan form or features that contribute to the significance of the asset. With repairs, the Council will expect retention and repair, rather than replacement of the structure, features, and materials of the building which contribute to its architectural and historic interest; and will require the use of appropriate traditional materials and techniques;

- using its legal powers to take steps to secure the repair of Listed Buildings, where appropriate;
- protecting the setting of Ancient Monuments and Listed Buildings where proposals could have an impact;
- taking a practical approach towards the alteration of Listed Buildings to comply with the Disability Discrimination Act 2005 and subsequent amendments, provided that the building's special interest is not harmed, using English Heritage advice as a basis.

Policy DM HD 3 Buildings of Townscape Merit

The Council will seek to ensure and encourage the preservation and enhancement of Buildings of Townscape

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Merit and will use its powers where possible to protect their significance, character and setting, by the following means:

- L. consent will not normally be granted for the demolition of Buildings of Townscape Merit
- 2. alterations and extensions should be based on an accurate understanding of the significance of the asset including the structure, and respect the architectural character, and detailing of the original building. The structure, features, and materials of the building which contribute to its architectural and historic interest should be retained or restored with appropriate traditional materials and techniques;
- 3. any proposals should protect and enhance the setting of Buildings of Townscape Merit:
- 4. taking a practical approach towards the alteration of Buildings of Townscape Merit to comply with the Disability Discrimination Act 2005 and subsequent amendments, provided that the building's special interest is not harmed, using English Heritage advice as a basis.

Policy DM HD 7 Views and Vistas

The Council will seek to protect the quality of views indicated on the Proposals Map. It will also seek opportunities to create

attractive new views and vistas and, where appropriate, improve any that have been obscured.

Policy DM HO I Existing Housing (including conversions, reversions, and non selfcontained accommodation)

Existing housing should be retained. Redevelopment of existing housing should normally only take place where:

- 1. it has first been demonstrated that the existing housing is incapable of improvement or conversion to a satisfactory standard to provide an equivalent scheme; and if this is the case:
- 2. the proposal improves the long-term sustainability of buildings on the site; and
- 3. the proposal does not have an adverse impact on local character; and
- 4. the proposal provides a reasonable standard of accommodation, including accessible design, as set out in Policy DM HO 4 'Housing Mix and Standards' and other policies.

Policy DM HO 2 Infill Development

All infill development must reflect the character of the surrounding area and protect the amenity of neighbours. In considering applications for infill development the following factors will be taken into account:

1. Plot width - plots must be of sufficient

- width to allow a dwelling(s) to be sited with adequate separation between dwellings;
- 2. Spacing between dwelling new dwellings must have similar spacing between buildings to any established spacing in the street;
- 3. Height dwelling height should reflect the height of existing buildings;
- 4. Materials where materials on existing dwellings are similar, new dwellings should reflect those materials;
- 5. Architectural details new dwellings should incorporate or reflect traditional architectural features:
- 6. Trees, shrubs and wildlife habitatsfeatures important to character, appearance or wildlife must be retained or re-provided;
- 7. Impact on neighbours including loss of privacy to homes or gardens.

Policy DM HO 3 Backland Development

There will be a presumption against loss of back gardens due to the need to maintain local character, amenity space and biodiversity. In exceptional cases where it is considered that a limited scale of backland development may be acceptable it should not have a significantly adverse impact upon the following:

1. Garden land - rear garden land which contributes either individually or as part

- of a larger swathe of green space to amenity of residents or provides wildlife habitats must be retained;
- 2. Impact on neighbours privacy of existing homes and gardens must be maintained and unacceptable light spillage avoided;
- 3. Vehicular access or car parking these must not have an adverse impact on neighbours in terms of visual impact, noise or light. Access roads between dwellings and unnecessarily long access roads will not normally be acceptable;
- 4. Mass and scale of development on backland sites must be more intimate in scale and lower than frontage properties;
- 5. Trees, shrubs and wildlife habitatsfeatures important to character, appearance or wildlife must be retained or re-provided.

Policy DM TP 8 Off Street Parking -Retention and New Provision

Developments, redevelopments, conversions and extensions will have to demonstrate that the new scheme provides an appropriate level of off street parking to avoid an unacceptable impact on onstreet parking conditions and local traffic conditions.

A set of maximum car parking standards and minimum cycle parking standards are set out in Appendix Four - Parking

Standards 'Appendix Four - Parking Standards 'for all types of development, these take into account bus, rail and tube accessibility as well as local highway and traffic conditions including demand for on-street parking. These standards will be expected to be met, unless it can be shown that in proposing levels of parking applicants can demonstrate that there would be no adverse impact on the area in terms of street scene or on street parking.

Policy DM TP 9 Forecourt Parking

The parking of vehicles in existing front gardens will be discouraged, especially where

- this would result in the removal of architectural features such as walls, gates and paving, or of existing trees and other vegetation; or,
- where such parking would detract from the streetscape or setting of the property; or,
- where the use of the access would create a road or pedestrian safety problem; or
- where the width of the proposed entrance will be greater than the width of a normal driveway.

For any proposal the area of impermeable paving should be minimised and soft landscaping maximised.

The Council will seek to restrict permitted development rights for forecourt parking through Article 4 directions, where

important townscape or surface water flooding issues exist. The Council will have regard to the impact of forecourt parking in considering proposals to extend or convert existing residential property.

Policy DM DC | Design Quality

New development must be of a high architectural and urban design quality based on sustainable design principles.

Development must be inclusive, respect local character including the nature of a particular road, and connect with, and contribute positively, to its surroundings based on a thorough understanding of the site and its context.

In assessing the design quality of a proposal the Council will have regard to the following:

- compatibility with local character including relationship to existing townscape and
- frontages, scale, height, massing, proportions and form
- sustainable development and adaptability,
 subject to aesthetic considerations
- layout and access
- space between buildings and relationship to the public realm
- detailing and materials

Policy DM DC 7 Shop fronts and shop signs

The Council will resist the removal of shop fronts of architectural or historic interest.

The Council will expect proposals for new shop fronts or alterations to existing shop fronts to demonstrate a high quality of design, which complements the original design, proportions, materials and detailing of the shop front, surrounding streetscene and the building of which it forms part.

Blinds, canopies or shutters where acceptable in principle must be appropriate to the character of the shop-front and its setting; external security grilles will not normally be permitted; in sensitive areas, rigid and gloss finish blinds will generally be unacceptable;

Signage and illumination to shop fronts must demonstrate a high quality of design, which complements the character and materials of the shop front and surrounding streetscene, and does not compromise public safety. Large illuminated fascias will not normally be permitted, even if these are in the "house style" of a particular store.

New shop fronts must be designed to allow equal access for all users, and can incorporate flood protection measures where appropriate, Proposals should take account of the Councils SPD on Shop fronts and Shop Signs.

The Council will welcome proposals from groups of shops to add character to the street scene by the use of harmonious high quality design, colours and materials for their shop fronts.

Other relevant policies

Policy DM OS 2 Metropolitan Open Land

The borough's Metropolitan Open Land will be protected and retained in predominately open use. Appropriate uses include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water and open community uses including allotments and cemeteries.

It will be recognised that there may be exceptional cases where appropriate development such as small scale structures is acceptable, but only if it:

- Does not harm the character and openness of the metropolitan open land; and
- Is linked to the functional use of the Metropolitan Open Land or supports outdoor open space uses; or
- Is for essential utility infrastructure and facilities, for which it needs to be demonstrated that no alternative locations are available and that they do not have any adverse impacts on the character and openness of the metropolitan open land.

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Improvement and enhancement of the openness and character of the Metropolitan Open Land and measures to reduce visual impacts will be encouraged where appropriate.

When considering developments on sites outside Metropolitan Open Land, any possible visual impacts on the character and openness of the Metropolitan Open Land will be taken into account.

Policy DM OS 11 Thames Policy Area

The special character of the Thames Policy Area (TPA), as identified on the Proposals Map, will be protected and enhanced by:

- ensuring development protects the individuality and character, including the views and vistas, of the river and the identified individual reaches;
- discouraging land infill and development which encroaches into the river and its foreshore other than in exceptional circumstances, which may include where necessary for the construction of river dependent structures such as bridges, tunnels, jettles, piers, slipways etc.;
- ensuring development establishes a relationship with the river and takes full advantage of its location, addressing the river as a frontage, opening up views and access to it and taking account of the changed perspective with tides;
- 4. encouraging development which includes

- a mixture of uses, including uses which enable the public to enjoy the riverside, especially at ground level in buildings fronting the river;
- protecting and promoting the history and heritage of the river, including landscape features, historic buildings, important structures and archaeological resources associated with the river and ensuring new development incorporates existing features;
- protecting and improving existing access points to the River Thames, its foreshore and Thames Path, including paths, cycle routes, facilities for launching boats, slipways, stairs etc. and encouraging opening up existing access points to the public, both for pedestrians and boats;
- requiring public access as part of new developments alongside and to the River Thames, including for pedestrians, boats and cyclists, where appropriate;
- increasing access to and awareness of the river including from the town centres.

Policy DMTP 6 Walking and the Pedestrian Environment

To protect, maintain and improve the pedestrian environment, the Council will ensure that:-

 New development and schemes protect, maintain and, where appropriate, improve the existing pedestrian.

- infrastructure, including the Rights of Way network.
- New development does not adversely impact on the pedestrian environment and provides appropriate pedestrian access (see Policy DM TP 3 'EnhancingTransport Links').
- New development and schemes improve the safety and security of the pedestrian environment where appropriate.

Policy DMTP 7 Cycling

To maintain and improve conditions for cyclists, the Council will ensure that new development or schemes do not adversely impact on the cycling network or cyclists and provide appropriate cycle access and sufficient, secure cycle parking facilities, see Policy DMTP 3 'Enhancing Transport Links' and Policy DMTP 8 'Off Street Parking - Retention and New Provision'.

Relevant SPDs/SPGs

- Design Quality SPD Adopted Feb 2006
 www.richmond.gov.uk/spd_design_quality_doc_lowres-2.pdf
- Front Gardens and other Off-street
 Parking Standards SPD Sept 2006 www.
 richmond.gov.uk/spg_supplementary
 planning guidance_draft_approved.pdf
- Residential Development
 Standards March 2010 www.
 richmond.gov.uk/spd_residential_

- development_standards_2010_final_ version_30_L1_L0.pdf
- Shopfronts SPD March 2010 www. richmond.gov.uk/cg_shopfronts_cal_ lc.pdf
- Small and Medium Housing Sites SPD
 Feb 2006 www.richmond.gov.uk/spd
 small and medium housing sites.pdf
- Design Guidelines Leaflets 3 and 4: House Extensions and External Alterations. Adopted Sept 2002.
 Reformatted with minor updates July 2005. Based on UDP policies www. richmond.gov.uk/a4 houseext design web adpt-2.pdf
- Design Guidelines leaflet 11: Shopfront Security, First published 1997 and Reformatted with minor updates July 2005. Based on UDP policies www. richmond.gov.uk/shopsfront_security.pdf

Also of relevance is the Council's 'Public Space Design Guide' (Jan 2006). The overall aim is to provide guidance to help deliver the goal of improved streetscene and public spaces. www.richmond.gov.uk/public-space-design-guide

Thames Landscape Strategy (2012 refresh). This can be viewed at www. thameslandscape-strategy.org.uk

Appendix F

Extract from planning officer's report to committee (CDH6)

Mayor's Affordable Housing & Viability SPG and the Local Planning Authority's Affordable Housing SPD

Design

- 135. The NPPF attaches great importance to the design of the built environment and good design is a key aspect of sustainable development. New developments are encouraged to respond to local character and history and reflect the identity of local surroundings and materials. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.
- Policy LP 1 of the adopted Local Plan (2018) states that new development must be of a high architectural and urban design quality. Development must be inclusive, respect local and contribute positively, to its surroundings based on a thorough understanding of the site and its context. LP 2 of the adopted Local Plan expands on this by explicitly requiring new buildings to respect and strengthen the setting of the borough's townscapes and landscapes, through appropriate building heights.
- Taller Buildings will be inappropriate in all areas of the borough except the identified areas within Twickenham and Richmond. Further clarification regarding the definition of tall buildings is provided in the supporting text to Policy LP2 of the Local Plan, which indicates a tall building is defined as being substantially taller than their surroundings or causes a significant change to the skyline and 'taller' buildings are defined as those being significantly taller than the neighbouring buildings, but less than 18 metres in height (below six storeys). This definition is supported by Policy 7.7 of the London Plan.

Height, Massing and Landscaping

Extension to Commercial Units

- No concerns are raised regarding the proposed two-storey side extension to the existing BTM adjacent the railway. The proposed extension to the existing western BTM would follow the same style and scale as the existing building; with similar external facing materials. The proposed extension would integrate with the existing building appropriately so as to ensure that it harmonises with the historic character of the existing buildings.
- 139. Given the siting of the proposed two-storey side extension; it is noted that this element of the proposals would generally be obscured from view from within the public realm. Nevertheless, given its scale and design, it is not considered that the proposed ground and first-floor extensions would negatively impact the existing character of the host Building of Townscape Merit, the application site, nor the surrounding area in general.

Residential New Builds

- 140 The existing corrugated steel-clad industrial buildings on the application site are of no flistoric or architectural ment, are in a poor state of repair and is heavily dilapidated.
- The site is clearly visible from the adjacent railway line and the residential dwellings to the north-west of the railway, with some distant views (approx. 150m) afforded toward the site from the railway bridge along St Margarets Road to the south west of the site. The existing site is not considered to detract from the visual amenity of the street-scene given the lack of frontage to the existing streetscape. However, it is noted that the existing buildings are of an unsightly appearance and the site is generally untidy. As such, the existing application site is considered to detract from visual amenity and character of the surrounding area in general, particularly in those views afforded toward the site from the railway line to the north west and the existing residential dwellings beyond.

- 142. Notwithstanding the in-principle objections raised with regard to the change of use of the site; it is acknowledged that the demolition of the existing steel-clad buildings and refurbishment of the existing Buildings of Townscape Merit would offer an opportunity to enhance the appearance of the application site.
- 143 The East Twickenham Village Planning Guidance SPD identifies the general character of the surrounding area as part of the former Twickenham park, which was developed with houses from the mid-nineteenth century. The east side of Arlington Road is made up of semi-detached houses of a regular design with inset round-headed porches and rendered elevations. They appear to have originally had pebble-dash rendered facades which in many cases have been replaced with Stucco. The west side of Arlington Road features blocks of flats from the first half of the twentieth century. It is noted that the ground-floors of these flats are generally below street level with the blocks of flats generally extending up to four-storeys in height (above ground-floor level) or three-storeys (above ground-level) with roofspace accommodation. Adjacent to the application site's entrance off Arlington Road, is two 1960's era blocks of flats, one three-storeys with gabled roof (to the south) and one four storey block of flats with flat roof forms and integrated balconies. Immediately adjoining the site access road to the south is the Twickenham Film Studios site, with a four storey brick building generally obscuring view of the application site from within the Arlington Road street-scene.
- 144. To the north of Arlington Road, continues Arlington Close, which features a short two-storey inter-war residential terrace, as well as single-storey (with roof-space accommodation) semi-detached dwellings fronting the western side of Arlington Close further north.
- 145. To the south of the application site is Kelvin Drive, a small cul-de-sac which leads to The Barons at its south. Kelvin Drive features three-storey flats constructed c. 1930, with the same development extending into The Barons.
- 146 There are numerous buildings (or groups of buildings) within the immediate surrounds of the application site where the predominant height is generally three-storeys, with a small number of examples which are four-storeys in height and/or feature accommodation at roof level. That give the impression of additional upper floors of accommodation. Consequently, it would be inappropriate to ignore the contribution which these buildings make to the character of the wider area.
- 147. With regard to the main residential block; although larger than the existing buildings it would replace, and taller that the existing two-storey mews buildings; the design of the roof (upper floor), together with its setback from the front and southern side elevation of the building, would allow for the development to be visually read as a three and four-storey building when viewed from the public realm and from private views towards the building both from outside of, and from within the application site, particularly in the context of the immediately adjacent four-storey Twickenham film studios building sited along the common boundary to the west.
- 148. For the above reasons, the proposal cannot be described being substantially taller than the surroundings or cause a significant change to the skyline, and so would not meet the criteria for a tall and larger buildings. The proposal would therefore not conflict with Policy LP2 of the adopted Local Plan (2018) which indicates that taller buildings would be inappropriate in this location.
- 149. Notwithstanding the above, whilst the proposed main residential building is not considered to represent a taller building within the context of the surrounding locality, concerns are raised that the scale of the proposed main residential block would fail to

relate to the exiting pitched-roof stable mews buildings (BTMs) to the south-west corner of the application site. The proposed separation distance of approx. 5.0m between the southern side elevation and the adjacent northern side level of the stable blocks to the south would not create an appropriate visual separation between the existing BTMs and the proposed main residential building. The existing BTMs feature an eaves height of approximately 6.1m, with the southern eaves height of the proposed main block sitting at approximately 10.0m. The proposed disparity in eaves height of approx. 4.0m, combined with the separation distance of approximately 5.0m would result in the main residential block subtending an angle of approximately 40° to the horizontal, when measured from the eaves height of the existing stable mews buildings. As such, it is not considered that the proposals would successfully link the smaller scale of the two-storey BTMs to the south, to the larger scale of the three-storey southern elevation of the proposed main residential block. Furthermore, the proposed approx. 13.0m length of the main block's southern side elevation, combined with the abovementioned height and separation distance to the BTMs would exacerbate the vast difference in scale bulk and mass proposed. The combined height and footprint of the proposed main residential block's southern elevation would therefore appear over dominant and fail to fit comfortably within the rhythm of the application site. The visual impact of the proposal has been illustrated through computer visualisations, and whilst it is not considered that the proposed building would appear out of place from within the streetscape of the area, it is considered that the concerns raised above would result in a cramped and contrived form of development which appears as an over intensification of the application site.

- 150. The proposed rear elevation of the main residential building is modulated through the use of recessed features (roof terrace) projecting balconies and stepped frontages, with two large glazed 'atrium' style openings which break up the otherwise strong horizontal emphasis. These design features would help break up the overall scale and massing of the building and give the rear elevation a distinctive rhythm and vertical emphasis in order to provide it with its own identity in the context of the surrounding, somewhat utilitarian development of the Twickenham Film Studios site.
- 151. The proposed front elevation similarly features some recessed features (roof terrace, metal panels), stepped building lines and projecting balconies. However, the proposed front elevation would feature a much stronger horizontal emphasis, with minimal visual breaks in the main building line and is dominated by stacked projecting balconies across the entire elevation. The proposed front elevation would not display the same visual interest as the rear elevation and with little vertical emphasis over four-storeys; would unsuccessfully break-up the mass and scale of the proposed building. As such; the front elevation of the proposed main building would appear visually dominant and incompatible due to the constrained nature of the application site.
- 152. The proposed smaller residential block at the rear of the site, at three-storeys (top floor in roof space), would be lower than the proposed main building, however it would be approximately 1.60m higher than the existing BTMs ridge height and approximately 3.70m taller than the existing BTMs eaves height. The proposed smaller block would be sited adjoining the rear elevation of the existing south-eastern stable-building (BTM). Furthermore, the proposed smaller residential block's second-floor eaves height would protrude approximately 700mm above the eaves of the adjoining BTM. With its flat roof forms and large glazed openings dominating its front and rear elevations, the proposed smaller residential block, by reason of its scale, flat-roof forms and eaves height at both second and third-floor level (roof level), would offer no visual relationship to the existing BTM to which it would be joined. The proposed smaller unit would appear as a visually dominant and incongruous form of development which detracts from the visual amenity of the application site. Furthermore, this element of the proposals would exacerbate the

visual imposition on the existing stable buildings which would occur as a result of the proposed development.

- 153. The scheme would introduce two new soft landscaped areas to the site. One small landscaped area to the rear of the main residential block, and one larger communal space to the rear of the smaller residential block. It is also proposed to introduce a small planted buffer to the frontage of the proposed main residential black, adjoining onto the north-west side of the hard-landscaped driveway area. The existing hard-landscaped area between the BTMs to the rear of the site is proposed to be repaired and reinstated to the full length of these stable buildings. Whilst concerns remain regarding the functionality and usability of the proposed site layout, it is noted that the existing site is 100% impermeable and does not feature any existing planting. As such, it is considered that the proposed landscaping would provide somewhat of an improvement to the visual amenity of the application site and therefore the LPA would not be able to sustain a reason for refusal on this basis.
- 154. Had the scheme been considered acceptable; any planning permission granted should be subject to appropriately worded conditions requiring details of hard and softlandscaping to be submitted to and approved in writing by the Local Planning Authority.

Materials and Appearance

Extensions to Commercial Buildings

155. Given the proposed external facing materials would match those of the adjoining BTM: it is considered that the proposed materials of this element of the scheme would suitably harmonise with the host building. As such, no objections are raised in this regard. Similarly, no objection is raised with regard to the proposed and altered fenestration arrangement to the existing BTMS, which would be of a design and layout which remains suitably in scale and proportionate to the host buildings.

Residential New Builds

- 156. The relatively understated design, with a simple repetitive treatment to the elevations would make a neutral contribution to a varied rhythm and texture of the facades of the buildings in close views, while the contrasting roof materials, brick detailing and use of large glazed elements would add visual interest to longer views.
- 157. The proposed apartment blocks would be contrasting in their contemporary appearance and form, to the more traditional Victorian detailing of the stable terraces. However, the consistent use of matching yellow London stock brickwork would ensure there is some sense of integration and continuity. This would also ensure that the proposed buildings would appear to relate to the stable terraces (BTMs) when viewed from the railway. It is proposed to refurbish the existing stable terraces (BTMs), with the cleaning off of built-up soot residue, exposing the brighter, original brickwork appearance, which would further ensure that the materials used in the proposed residential buildings would appear to relate to these existing BTMs.
- The use of high-quality stock brick and contrasting metal cladding and glazing within the proposed modern buildings would complement the surrounding more traditional stock brick and red brick of the adjacent Twickenham Film Studios, providing a unifying feature. It is considered that the use of matching brickwork on the proposed balconies with a contemporary 'hit-and-miss' layout, however this would not overcome the concerns raised regarding the proposed projecting balconies displaying little visual interest and a strong horizontal emphasis when viewed in the context of the proposed front elevation of the main residential block.

169. The proposed zinc clad setback roof and zinc clad stair core surrounds have been incorporated as an attempt to reference the existing industrial character of the site, with windows and doors proposed to have matching grey metallic finished frames, to ensure that the scheme would harmonise with the surrounding development, details of external meterials (including fenestration) would have been required by condition; had the scheme been acceptable.

Design Condusion

- The proposed two-storey extension to the western most existing BTM to the rear of the site would not detract from the character and visual amenity of the application site, nor the surrounding locality. Whilst no concerns are raised regarding the proposed materials: this would not overcome the concerns raised with regard to the visually dominant and incompatible design of the proposed front elevation, and the visual imposition of the proposed smaller residential block in relation to the existing BTMs, to which it would be joined.
- 161. In light of the above, the overall siting, footprint and mass of the proposed main residential building, combined with the height and siting of the proposed smaller residential building, would fall to be of an appropriate scale for the size of the application site without being overly dominant. The proposed development would therefore, result in an inharmonious form of overdevelopment failing to accord with Policies LP1 and LP 39 of the Local Plan (2018).

Impact on Heritage Assets (both designated and non-designated)

- 162. The application site is not situated within, or adjoining a Conservation Area, nor does it relate to any Statutory Listed Buildings or Scheduled Monuments. As such, it is not considered that the proposed development would detract from the significance, including the setting of any designated heritage assets.
- 163. Policy LP 4 of the adopted Local Plan seeks to presurve, and where possible enhance, the significance, character and setting of non-designated haritage assets, including Buildings of Townscape Maril (BTM) memorials, particularly war memorials, and other local historic features.
- As mentioned above, by virtue of the scale, height and siting of the proposed main residential block and the siting and height of the proposed smaller residential block, it is considered that the proposals would introduce new built elements to the application site that would be overly dominant and inharmonious with regard to the non-designated heritage assets on the site. When considering the impact on the existing BTMs, it is acknowledged that their character and significance are best appreciated in close views, particularly from within the application site. As a result, the existing BTMs are not considered to greatly contribute to the visual amenity and character of the surrounding locality and streetscene. Nevertheless, adopted policy LP4 of the Local Plan seeks to preserve and enhance the significance, character and setting of non-designated heritage assets.
- 165. Whilst unsightly as a result of their age and existing use, the existing buildings on site which are proposed to be demolished are single-storey and are not considered to significantly impact on the setting of the BTMs to the rear of the site. With uninterrupted views afforded toward the existing stable buildings from the northern end of the application site, it is considered that the setting of these BTMs within the context of the site is, at present, somewhat preserved (see images 1 and 2 below).



Image 1 - Existing views toward BTMs from north to south



Image 2 - Existing views toward BTMs from north to south

166. The proposed development would result in the complete removal of any views toward these buildings, preventing any visual appreciation of the non-designated heritage assets when viewed from the north. The submitted design and access statement acknowledges that the existing stable buildings have become somewhat 'land-locked' by the development of Twickenham Film Studios and Arlington Works over much of the last century. The proposed development would exacerbate this issue, and would not preserve the setting of these buildings, to the detriment of the special historical interest of the BTMs in question (see figure 8).



Figure 8 - Proposed views looking north to south

167 With regard to the proposed smaller residential block, this element of the proposals, by reason of its scale, flat-roof forms and eaves height at both second and third-floor level (roof level), would offer no visual relationship to the existing BTM to which it would be joined. The proposed smaller unit would appear as a visually dominant and incongruous form of development which detracts from the visual amenity of the application site.

Furthermore, this element of the proposals would exacerbate the visual imposition on the existing stable buildings which would occur as a result of the proposed development.

- 168 Whilst it is noted that the proposed works to improve the appearance of the BTMs and refurbishment/extension of the cobbled pavement between these buildings would be welcomed; this would not overcome the concerns raised with regard to the proposed development of the residential blocks appearing overly dominant and incompatible in relation to the setting, scale and height of the stable block BTMS.
- As a result, the impact on the setting of the non-designated assets is judged to detract from the existing on-site circumstance given that the proposals would appear overly dominant and would not fit comfortably within the application site. The proposed development would therefore fail to accord with the aims and objectives of policy LP4 of the adopted Local Plan (2018).

Protected Views

- 170. Policy LP5 of the Local plan (2018) seeks to protect the quality of the views, vistas, gaps and the skyline, all of which contribute to the character, distinctiveness and quality of the local and wider area by protecting the quality of the views and vistas as identified on the Policies Map.
- 171. The site is not located within any strategic views designated in the London Plan however it is situated within the locally protected views from Petersham Part to Twickenham and from Terrace Garden to South West Twickenham.
- 172. As identified above, the proposed development is not considered to constitute taller or larger buildings. This combined with the prevailing heights of neighbouring developments, particularly that of various buildings within the adjacent Twickenham Film Studios site is considered to ensure that the proposed development would not detract from any locally significant views and vistas.

Density

- 173. The London Flan outlines the need for development proposals to achieve the highest possible intensity of use compatible with local context. The design principles of the compact city and with public transport accessibility.
- 174. The site has a relatively low Public Transport Accessibility Level (PTAL) of 2 which represents a poor access to services, and its setting can be classified as urban in character. The London Plan density matrix (Table 3.2), therefore, suggests a residential density of between 200 to 450 habitable rooms per hectare, or 70 to 120 dwellings per hectare, for this scheme. The proposed development of 24 units proposes 149 habitable rooms/hectare and results in a residential density of 79.2 units/hectare.
- 175 The proposal therefore does not meet the suggested density for units/hectare but falls within the suggested density for habitable rooms/hectare. It is acknowledged that the density ranges recommended in the London Plan should not be applied mechanistically and it would be more appropriate to assess whether the proposed building fits acceptably onto the site, is of sufficient high quality of design, appropriate to its context, and does not harm local residential amenity.
- 176 It is considered that the proposed residential density is appropriate for the site, this is due to the appropriate housing mix for the location and the fact that the proposed development has not been found to cause harm to residential amenity of neighbouring nor future occupants.

177 Notwithstanding the above; whilst it is considered that the scheme would provide an appropriate residential density; this benefit would not outweigh the harm caused by the proposed development with regard to loss of a safeguarded waste site and unjustified loss of an existing industrial land use, among other concerns raised within relevant sections of this report.

Housing Mix, Standard of Accommodation and Play Space

- 178. LP 35 of Local Plan seeks that development should generally provide family sized accommodation, except within town centres and Areas of Mixed Use and that housing mix should be appropriate to the location. All new housing units are required to comply with the Nationally Described Space Standards and appropriate external private and/or communal amenity space necessary to meet the needs generated by the users of the development.
- 179 Policy LP8 requires that developments will be required to protect the amenity and living conditions of the new occupants of new development. Policy LP10 of the Local Plan requires that the local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of new users or occupiers of the development site.
- 180. Further to the above, a single bedroom should be at least 7 5sqm and 2.15m wide. A double should be 11.5sqm and 2.75m wide. The London Plan suggests that head height should be at least 2.3m for a minimum of 75% of the gross internal floor area. The minimum internal space and external space standards are as follows:

Table 2 - Minimum Internal space and external space standards:

Net internal Floor Area	External space standards
50sq.m	.5sq.m
61sq.m	6sq m
70sq.m	7sq m
74sq.m	7sq.m
84sq.m	7sq. m
	Area 50sq.m 61sq.m 70sq.m 74sq.m

181. Policy LP 35 of the Local Plan requires that all new homes should be built to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% would be expected to meet Building Regulation Requirement M4 (3) 'wheelcheir user dwellings'

Housing Mix

The proposed housing mix would comprise of 20.8% small units (5 one-bedroom units), 50% of two-bedroom units and 29.2% three-bedroom units. Policy LP35(A) seeks family sized accommodation outside of main centres and Areas of Mixed Use. The policy does recognise the housing mix should be appropriate to the location and in this instance, it is acknowledged that proposed residential mix would be broadly in accordance with the surrounding locality. Notwithstanding the above, whilst the residential unit mix is considered appropriate to the location in isolation; this does not overcome the aforementioned concerns raised with regard to the unacceptable mix of uses on this site.

Quality of Residential Accommodation

183. The units would have Gross Internal Areas (GIA) of 51sqm for the 1-bedroom units; 62-78sqm for the 2 bed units and 76-101sqm for the 3-bedroom units. All proposed unit types would comply with nationally described space standards in terms of overall size and bedroom size

184. The number of dwellings accessed from a single core would not exceed five, and none of the units have been identified as not mosting the required standard.

External amenity space

- 185. The proposal provides private amenity space to 22 of the 24 proposed dwellings (ranging from 8.8sq m 35.7sq m). The two ground-floor flats within the proposed smaller block would not include private amenity space.
- 188. The proposal includes a total area of approximately 291sqm of communal amenity space, that would be include approximately 174sqm of communal space to the rear of the mem residential block, and approximately 174sqm to the rear of the smaller block. Whilst the proposed communal space to the rear of the main block appears somewhat cramped and contrived, given each of the units within this building would be provided with policy compliant private amenity space; it is not considered that this would render a reason for refusal in this instance. Furthermore; the two units which would not be provided with suitable private amenity space would have direct access to the communal area at the rear of the small residential block. As a result, this space would be considered a usable, functional and safe, amenity space for the requirements of the development.
- 187 Whilst the under provision of private external amenity space to some units is unfortunate, on balance, it is considered that due to the mixed-use location, the overall shortfall in private amenity space provision could be made up through the incorporation of the proposed shared amenity space to the rear of the smaller residential block.

Privacy, outlook, sunlight and daylight:

- 188 A minimum distance of 20 metres between habitable rooms within the residential development is generally required for privacy reasons. Where principal windows face a wall that contains no windows or those that are obscured (e.g. Bathrooms), separation distances can be reduced to 13.5 metres. It is however acknowledged that these should be useful yardsticks for visual privacy but adhering ngidly to these measures can limit the variety of urban spaces and housing types in the city and can sometimes unnecessarily restrict density.
- 189 None of the proposed habitable room windows would be situated within 20.0m of habitable room windows on neighbouring residential buildings, nor within the proposed residential units on the application site.
- 190 The distance between the windows of the proposed flats within the front elevation of the main residential block, facing onto the rear elevation of the existing Twickenham Film Studios building would be between approx. 12.0m and 20.0m; and the distances between the flats at the rear of the main residential building and the existing residential buildings to the north of the railway line would be greater than 20.0m.
- 191 It is acknowledged that the minimum separation distance between the proposed flats within the front elevation of the main residential building and the rear of Twickenham Film Studios would be less than the preferred separation distance. However, it is not considered that there would be an undue loss of privacy given the existing use of the adjacent Twickenham Film Studios and the unlikelihood that residential occupiers of the proposed development would be home during business hours. Whilst the proposed units 21-24 within the proposed smaller residential block would be sited perpendicular to the main residential block, it is considered that the oblique views afforded to/from the front elevation of the main residential block and the smaller residential block would not give.

nse to unacceptable opportunities for overlooking between habitable room windows. Similarly

- 192 It is acknowledged that only proposed units 1, 7 and 13 would feature habitable room windows situated less than 13.5m from the existing rear elevation of the Twickenham Film Studios building. Given the proposed separation distances would fall short of the recommended distance by only 0.5m and the siting of the film studios building and the proposed residential units in question, it is noted that relatively unobstructed oblique views would be available from these habitable room windows to the north-east. As such: it is considered that, on balance, the proposed development would provide adequate outlook to proposed habitable room windows.
- 193 Six units within the proposed main residential block would be single aspect, however none would be north facing. All other units would be dual aspect (75% of all the proposed residential units). All habitable rooms would have access to full height windows, and so a good level of direct sunlight to all of units would be achieved at various times of the day.
- 194 It is acknowledged that the existing three-storey Twickenham Film Studios building would be situated to the south of the front elevation of the main residential block. The proposed single aspect units (1, 4, 7, 10, 13, 816) would be situated within the southern elevation of the main residential block, facing toward the Film Studios building. In this regard, the application is supported by an assessment of the daylight and sunlight levels within the proposed new dwellings. The submitted assessment (Prepared by EB7 Ltd., dated: 26 October 2016) focuses on the most constrained units on the ground floor of the development, namely units 1, 2, 4, and 22. The results of the assessment on these proposed units have then been used to extrapolate a likely level of daylighting/sunlighting throughout the remainder of the proposed residential units.
- 195 The submitted sunlight/daylight assessment has been carried out to a methodology in accordance with the Building Research Establishment's (BRE) 'Site Layout planning for Daylight and Sunlight: a guide to good practice', (BRE, 2011).
- 198. With regard to residential new builds: the Average Daylight Factor (ADF) test quantifies the average illuminance within a room as a proportion of the illuminance available to an unobstructed point outdoors under a sky of known luminance and luminance distribution it considers the physical nature of the room behind the window, including size window transmittance and surface reflectivity. As set out within the applicant's internal sunlight/daylight assessment, the BRE guidance sets out that ADF levels for proposed rooms of main habitable use are acceptable as follows.
 - Bedroom: 1.0%.
 - . Living Room: 1.5%;
 - Kitchen: 2.0%
- 197 Furthermore; it is common practice to apply the criteria relevant to the predominant use of the room where rooms have more than one use. Where kitchens are situated at the rear of open plan living spaces, these areas are assigned a target of 1.5%. The applicant's sunlight/daylight assessment sets out that where kitchens are situated at the rear of generously sized living spaces; the kitchen areas have been notionally internalised and the remaining living area assessed with a target ADF for its use of 1.5%.
- 198 The daylight assessment results identify that all of the proposed habitable room windows to units 1, 2, 4 and 22 have been found to exceed the minimum ADF requirement. As mentioned above, the ADF assessment has not been carried out on all of the proposed habitable rooms however it is acknowledged that the habitable room.

windows tested are considered to be those most constrained with regard to daylighting based on their siting within the proposed development and their respective relationship to neighbouring buildings. As such, it is considered that, on balance, the proposed development would provide adequate daylighting to each of the proposed habitable room, windows.

- 199 With regard to sunlighting of proposed new dwelling's habitable room windows, the Annual Probable Sunlight Hours (APSH) test calculates the percentage of statistically probable nours of sunlight received by each window in both the summer and winter months. The BRE guidelines outline that main living rooms within new buildings should achieve at least 25% annual sunlight hours, with 5% during winter months.
- 200 The submitted sunlight assessment identifies that the total and winter APSH assessments carried out identify that two of the four living room windows would experience levels of sunlight in excess of the BRE targets. The remaining two living rooms, located in proposed units 2 and 3, have also been found to experience greater levels of winter sunlight than the BRE targets (7% and 11% respectively, where the target is 5%), it is noted however, that both units 2 and 3 fall slightly short of the total sunlight hours target in accordance with BRE guidance, achieving 13% and 14%, respectively, where 25% is the target prescribed by BRE guidance.
- 201 Whilst the above shortfall is not ideal, it is acknowledged that BRE guidance on sunlighting of habitable room windows recognises that providing an unobstructed southfacing orientation to all units is not possible where developments are of a larger, urban scale. The BRE guidance outlines that where groups of dwellings are planned site layout design should aim to maximise the number of dwellings with a main living room that meets the above recommendations. It is noted that only 8% of the proposed dwellings would fall short of the 25% recommendation for annual probably sunlight hours. Furthermore, as set out in the applicant's sunlight/daylight assessment, the obstruction of sunlight to the windows in question is partly due to the presence of projecting balconies to the floors above it is acknowledged that there is a trade-off between the presence of balconies for private external amenity space and the annual probable sunlight hours received to the windows behind such balconies. It is considered that, on balance, the presence of balconies is considered to provide increased amenity value to the living areas of the proposed dwellings. The British Standard guidance BS8206 part 2 applies to rooms of all prientations and sets out that if a room is within a building in a densely-built urban area, the absence of sunlight is more acceptable than when its exclusion seems arbitrary. It is therefore considered that, on balance, the amenity value lost by removal of the proposed. balconies would not be made up for by the additional sunlighting received to the proposed living are windows.
- 202 Overall the layout and onentation of the flats is considered to be acceptable and would offer satisfactory outlook, aspect and sunlighting and daylighting. It is also worth noting that any future purchaser or occupier of the units would be fully aware of the nature of the current development and would consider this before deciding to whether to purchase

Inclusive access

- 203 All units are designed to be compliant to meet at least Building Regulation Requirement. Part M4(2) 'accessible and adaptable dwellings'. The submitted proposed plans show two lift cores within the main building and therefore it would be expected that step-free access requirements are met.
- 204 Whilst the submitted Design and Access Statement outlines that three of the proposed units would be designed to meet Building Regulation Requirement Part M4(3), the proposed plans do not identify if any of the proposed units are designed to be compliant.

to meet at least Building Regulation requirement M4(3) wheelchair user dwellings' (wheelchair accessible or easily adaptable for residents who are wheelchair users)

205 Had the scheme been considered acceptable, clarification would have been sought as to which units would be wheelchair accessible in order for this to be secured by condition.

Children play space

- 206 Policy LP31 of the adopted Local Plan seeks to maintain, and where possible, improve the children sand young people's play facilities in the porough. It is outlined that new development, where the estimated child occupancy is ten children or more, could lead to increased usage of, and therefore place additional burdens and strains on existing facilities. Consequently, developers for major applications will be required to submit a child occupancy assessment in line with the Council's child yield calculator, as set out in the Pianning Obligations SPD.
- 207 The Council's SPD outlines that Local Policy requires, in accordance with the Mayor's SPG on Shaping neighbourhoods: Play and Information Recreation (2012), developments with a child occupancy of 10 children or more to ensure there is appropriate play provision to meet the needs arising from developments.
- 208. In considering play space requirements for a development site, the Mayor's SPG sets out the following requirements.

Table 3, provision of play space to meet the needs of new development

	Actual Walking Distance	Under 5s	5-11 year olds	12+ year olds
No Existing Provision	Within 100m	On-site	Off-site	Off-site provision
	Within 100-400m	On-site	On-site	On-site or off-site provision
	Within 400-800m	On-site	On-site	On-site

209. The Council's population yield calculator estimates that the expected child population the proposed development would be 17.39, Based on the Mayor's Play Space SPG, a requirement of 173.9sq.m of child play space is required.

Table 4 - Child yields for the proposed development (Market Housing)

Unit Type	Number proposed	Child Yield	Total
One-bedroom flat	5	0	.0
Two-bedroom flat	10	0.49	4.9
Three-bedroom flat	5	1.11	5 55
Total	20	*	10.45

Table 5 - Child yields for the proposed development (Affordable Housing)

Unit Type	Number proposed	Child Yield	Total
One-bedroom flat	0	0	0
Two-bedroom flat	2	1.12	2.16
Three-bedroom flat	2	2.39	4.78
Total	4		6.94

210 The applicant has submitted that, using the Mayor's SPG Child Yield Calculator; the proposed development would require a total area of 57.5sq.m of dedicated play space. However, it is stated that due to the site constraints, it is not practical or feasible to deliver.

Appendix G

London Plan Policy 3.5 Quality and Design of Housing Developments (CDB2)

capacity, and subject to the wider concerns of this policy, the density of a scheme may be at the higher end of the appropriate density range. Where connectivity and capacity are limited, density should be at the lower end of the appropriate range. The Housing SPG provides further guidance on implementation of this policy in different circumstances including mixed use development, taking into account plot ratio and vertical and horizontal mixes of use.

Residential density figures should be based on net residential area, which includes internal roads and ancillary open spaces. Family housing is generally defined as having three or more bedrooms. Car parking provision should be in accordance with the standards outlined in Chapter 6. The Housing SPG provides guidance on addressing the relationships between car parking provision, development density and levels of public transport accessibility in different types of location.

POLICY 3.5 QUALITY AND DESIGN OF HOUSING DEVELOPMENTS

Strategic

A Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live. Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.

Planning decisions and LDF preparation

- B The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.
- C LDFs should incorporate requirements for accessibility and adaptability¹, minimum space standards² including those set out in Table 3.3, and water efficiency.³ The Mayor will, and boroughs should, seek to ensure that new development reflects these standards. The design of all new dwellings should also take account of factors relating to 'arrival' at the building and the 'home as a place of retreat'. New homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives and should be conceived and developed through an effective design process⁴.

¹ Requirements M4 (2) and M4 (3) of Schedule 1 to the Building Regulations 2010. HM Government 2015.

² Technical housing standards – nationally described space standard. DCLG 2015

³ London Plan Policy 5.15

⁴ Mayor of London, Housing SPG 2016

- D Development proposals which compromise the delivery of elements of this policy, may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan.
- E The Mayor will provide guidance on implementation of this policy that is relevant to all tenures.

Table 3.3 Minimum space standards for new dwellings⁵⁷

		Minimum GIA			
Number of bedrooms	Number of bed spaces	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage (m2)
1b	1p	39 (37)*			1.0
וט	2p	50	58		1.5
O.I.	3p	61	70		2.0
2b	4p	70	79		2.0
	4p	74	84	90	
3b	5p	86	93	99	2.5
	6р	95	102	108	
	5p	90	97	103	
4b	6p	99	106	112	3.0
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

Notes to Table 3.3

The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls that enclose a dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. GIA should be measured and denoted in square metres (m²).

The nationally described space standard sets a minimum ceiling height of 2.3 meters for at least 75% of the gross internal area of the dwelling. To address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.

^{*} Where a one person dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m², as shown bracketed.

Appendix H

London Plan Policy 7.4 Local Character (CDB2)

- the quality of the local environment. All spaces should have clear ownership and be managed in a way that states that the space is cared for. Future maintenance of the space or building should be considered at the design stage.
- 7.11 Buildings and spaces should be designed in a way that clearly defines whether they are public, semi-public or private, and provides opportunities for activity and passive surveillance of publicly accessible spaces from ground and lower floors of buildings. Pedestrian, cycle and vehicular routes should be well defined, and limit opportunities for concealment.
- An integrated mix of land uses throughout a neighbourhood will add to its vitality and security but should be carefully designed to minimise conflict between incompatible activities. Day time and night time uses should be incorporated into development where appropriate to ensure that public spaces are active and overlooked.

POLICY 7.4 LOCAL CHARACTER

Strategic

A Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Planning decisions

- B Buildings, streets and open spaces should provide a high quality design response that:
 - a has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
 - b contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
 - c is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
 - d allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
 - e is informed by the surrounding historic environment.

LDF preparation

C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Appendix I

LBRUT Local Plan Policy LP1 Local Character and Design Quality (CDB1)

4 Local Character and Design

4.1 Local Character and Design Quality

Policy LP 1

Local Character and Design Quality

A. The Council will require all development to be of high architectural and urban design quality. The high quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.

To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:

- 1. compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;
- 2. sustainable design and construction, including adaptability, subject to aesthetic considerations;
- 3. layout, siting and access, including making best use of land;
- 4. space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;
- 5. inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and
- 6. suitability and compatibility of uses, taking account of any potential adverse impacts of the colocation of uses through the layout, design and management of the site.

All proposals, including extensions, alterations and shopfronts, will be assessed against the policies contained within a neighbourhood plan where applicable, and the advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design.

Shopfronts

B. The Council will resist the removal of shopfronts of architectural or historic interest. Shopfronts, including signage and illumination, should complement the proportions, character, materials and detailing, surrounding streetscene and the building of which it forms part. Blinds, canopies or shutters, where acceptable in principle, must be appropriate to the character of the shopfront and the context within which it is located. External security grilles and large illuminated fascias will only be allowed in exceptional circumstances. In sensitive areas, such as Conservation Areas and relevant Character Areas as identified in the Village Planning Guidance SPDs, rigid and gloss finish blinds will generally be unacceptable.

Advertisements and hoardings

C. The Council will exercise strict control over the design and siting of advertisements and hoardings to ensure the character of individual buildings and streets are not materially harmed, having regard to the interests of amenity and public safety (including highway safety).

Village Planning Guidance

4.1.1 The London Borough of Richmond upon Thames has been divided into a series of smaller village areas. Each village is distinctive in terms of the community, facilities and local character, which together make up

Appendix J

LBRUT Local Plan Policy LP4 Non Designated Heritage Assets (CDB1)

account when making decisions. Where the quality of a Conservation Area has been eroded, the Council will take steps to ensure that new development and other schemes such as works to the public realm enhance the historic environment.

4.4 Non-Designated Heritage Assets

Policy LP 4

Non-Designated Heritage Assets

The Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, and other local historic features.

There will be a presumption against the demolition of Buildings of Townscape Merit.

- 4.4.1 The borough's exceptional historic environment is central to its character. Locally listed buildings, i.e. Buildings of Townscape Merit (BTM), and memorials (particularly war memorials, including those on private land or within buildings) as well as other local historic features such as statues, plaques, horse and cattle troughs, historic bollards, post boxes and historic telephone boxes are historic assets worthy of protection.
- 4.4.2 Buildings of Townscape Merit are buildings, groups of buildings or structures of historic or architectural interest, which are locally listed due to their considerable local importance. The Council's adopted SPD on BTMs sets out the criteria that will be taken into account when considering whether a building or structure should be designated as BTM. The policy sets out a presumption against the demolition of BTMs unless structural evidence has been submitted by the applicant, and independently verified at the cost of the applicant. Should demolition prove necessary, a high standard of design that complements the surrounding area will be required in any replacement building. Locally specific guidance on design and character is set out in the Council's Village Planning Guidance SPDs, which applicants are expected to follow for any alterations and extensions to existing BTMs, or for any replacement structures.
- 4.4.3 The Council has recorded all war memorials in the borough on a register. Memorials should be retained in situ, if possible, or sensitively relocated.

4.4.4 Applicants will be required to:

- 1. retain the character of Buildings of Townscape Merit, war memorials and any other non-designated heritage assets;
- 2. submit a Heritage Statement to assess the potential harm to, or loss of, the significance of the non-designated heritage asset, including from both direct and indirect effects;
- 3. describe the significance of the non-designated heritage asset affected, including any contribution made by their setting; the extent of the relevant setting will be proportionate to the significance of the asset. Appropriate expertise should be used to assess a non-designated heritage asset; and
- 4. retain or restore the structures, features and materials of the asset, which contribute to its architectural integrity and historic interest.

Appendix K

LBRUT Local Plan Policy LP39 Infill, Backland and Back Garden Development (CDB1)

9.6 Infill, Backland and Backgarden Development

Policy LP 39

Infill, Backland and Backgarden Development

Infill and Backland Development

A. All infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. In considering applications for infill and backland development the following factors should be addressed:

- 1. Retain plots of sufficient width for adequate separation between dwellings;
- 2. Retain similar spacing between new buildings to any established spacing;
- 3. Retain appropriate garden space for adjacent dwellings;
- 4. Respect the local context, in accordance with policy LP 2 Building Heights;
- 5. Enhance the street frontage (where applicable) taking account of local character;
- 6. Incorporate or reflect materials and detailing on existing dwellings, in accordance with policy LP 1 Local Character and Design Quality;
- 7. Retain or re-provide features important to character, appearance or wildlife, in accordance with policy LP 16 Trees and Landscape;
- 8. Result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens, in accordance with policy LP 8 Amenity and Living Conditions;
- 9. Provide adequate servicing, recycling and refuse storage as well as cycle parking;
- 10. Result in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.

Backgarden Development

B. There is a presumption against loss of back gardens due to the need to maintain local character, amenity space and biodiversity. Back garden land which contributes either individually or as part of a larger swathe of green space to amenity of residents or provides wildlife habitats must be retained. In some cases a limited scale of backgarden development may be considered_acceptable if it complies with the factors set out in A above. Development on backgarden sites must be more intimate in scale and lower than frontage properties.

9.6.1 Infill development is considered as sites within street frontages including the development of a small gap in an otherwise built up frontage. This policy could apply to a separate unit or units or an extension to an existing unit or outbuildings, and could include side garden plots. Each site will be assessed as to whether it is considered suitable for development. There is now no automatic presumption that this land is suitable for housing development.

9.6.2 It is important that infill development reinforces the character of streets by reflecting the scale, mass, height, form, fenestration and architectural details of its neighbours.

9.6.3 The character of streets has often been weakened by infilling space between dwellings. In considering new infill development the width of the remaining and the new plot should be similar to that prevailing in the immediate area and the established spacing between dwellings, building line and height should be maintained.

9.6.4 Character is also determined by materials and architectural details and these should reflect existing materials and predominant styles, in accordance with policy LP 1 in 4.1 'Local Character and Design Quality',

Appendix L

LBRUT Design Quality SPD Chapter 2: Guiding Quality (CDC2)

Urban design is often quoted as the art of making places for people, a process which is reliant on a number of different but mutually re-inforcing objectives. Successful places constitute more than good architecture. It is important to understand the functions of a place over time as well as the connections and spaces between buildings will effect the way a place 'feels' in three dimensions.

Character - A place with its own identity. To promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, landscape and culture,



Continuity and Enclosure - A place where public and private places are clearly distinguished.

To promote continuity of street frontages and the enclosure of space by development which clearly defines private and public areas.



Public Realm - A place with attractive and successful outdoor areas. To promote public spaces and routes that are attractive, safe, uncluttered and work effectively for all in society including disabled and elderly people.



Ease of Movement - A place that is easy to move around in and get to.

To promote accessibility and local permeability by making places that connect with each other and are easy to move through, putting people before traffic and integrating land uses and transport.



Legibility - A place that has a clear image and is easy to understand. To promote legibility through development that provides recognisable routes, intersections and landmarks to help people find their way around.



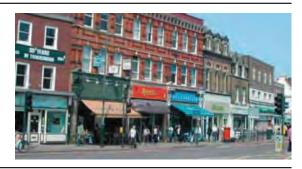
Adaptability - A place that can be adapted easily.

To promote adaptability through development that can respond to changing social, technological and economic conditions.



Diversity - A place with variety and choice.

To promote diversity and choice through a mix of compatible developments and uses that work together to create viable places that respond to local needs.



This Guide fully endorses these principles which have underpinned its development. Many of the accompanying issues are cross cutting and interdependent; it is important that applicants for planning permission read and understand this chapter in its entirety.

The guidance proposes ways in which developers and designers can analyse and react to common design issues in this Borough. Ultimately it is written to highlight and promote high standards of design and in doing so aims to restrict poor and mediocre development. There is no single solution to any given problem and this advice is not meant to be conclusive: the creativity of developers, designers and the Local Planning Authority will be instrumental in ensuring high quality outcomes.

2.1 Character- A place with its own identity

The Borough is made up of places with distinctive characters shaped by the design and arrangement of buildings, the spaces and connections between them and the uses which define them. New development should complement and enhance the character of these places by starting with an analysis of the existing urban form and avoid standard 'of the shelf' designs. A summary of Borough wide character is given in chapter 3.

Character and Context Appraisal

A character and context appraisal should be undertaken before any design work to ensure that the characteristics of each site influence the final design. It is important that new development is grounded in what is special about a place. There will be positive attributes to all sites which should enrich the final design. The level of detail required for a character and context appraisal will depend on the scale of the proposal. A relevant area around the site should also be considered to identify any common themes within the vicinity. A number of layers of understanding exist which should be considered to inspire the design process:

- Borough wide the characteristics which define the Borough as a whole.
- Character areas the distinctive forms and building relationships within the neighbourhood or locality as well as any wider movement linkages.

- Street setting the relationship between the site and the street as well as the characteristics of local building forms, detailing and materials.
- Site characteristics any built or natural characteristics within the site itself.

A detailed site appraisal will need to encompass the main urban design issues of activity, linkages, townscape and landscape. When considering these issues the appraiser should consider what local people value about the place and how it can be improved. The following points highlight some immediate questions the appraiser should ask but this is by no means exhaustive.

Activity

Key themes: Uses of buildings (ground and upper floors) and public space, densities, intensity, day/evening activities.

Some considerations:

- What is the character of local activityresidential, commercial, recreation, leisure, industrial, mixed?
- What is the intensity and density of activity- semi-rural, suburban, urban?
- How does the site relate to local services and activities- schools, open space, shops?
- Does the site relate to any major activity nodes- road corridors, public space or public transport interchanges?
- Is the area busy throughout the day?

Linkages

Key themes: Settlement patterns, access, road and pedestrian network, public transport.

Some considerations:

- What is the character of local streetsstreet proportion, blocks, patterns?
- Where are the pedestrian and vehicular access points located?
- Are there any existing rights of way?
- How can the development create new connections?
- How do local streets align with contours?
- How will topography influence pedestrian and cycle routes?
- How does the site relate to public transport?

Townscape

Key themes: Building forms, local vernacular and heritage, enclosure, views, landmarks.

Some considerations:

- What are the local building forms in terms of scale, form, height, massing and layout?
- What is the local vernacular- detailing, fenestration, materials, texture and colour?
- What is the sense of enclosure- gaps, frontages?

- What is the character of local roofscape - how will the proposal affect the local or Borough wide skyline?
- How can the development make the most of views into or out of the site?
- How do local buildings deal with changes in level?
- Are there any landmarks and how does the site relate to them?

Landscape

Key themes: Open space, natural features, microclimate.

Some considerations:

- How does the site relate to areas of open space- parks, wildlife corridors, the River Thames?
- How does the site relate to drainage in the area?
- What is the natural character of the site- are there any on site trees, hedgerows, shrubs or water bodies?
- Is the site exposed to the elements?
- What is the orientation of the site and how can development utilise the path of the sun?

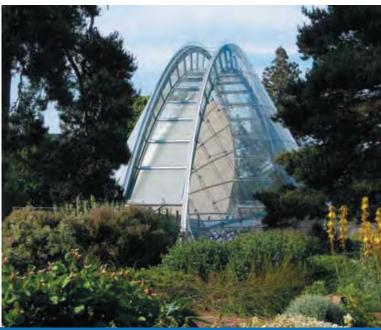
Responding to Local Character

The information gathered through a character and context appraisal will provide a rich insight into the area to act as a basis for a design concept. It is important that the appraisal is not considered as a discrete process from design. The design concept will need to recognise the opportunities offered by the site and accept any limitations in order to reconcile the needs of the development. Demonstration of this understanding and evidence to support it will also be required at the planning application stage in the form of a Design and Access Statement (see Appendix 1).

Whilst applicants for planning permission will be required to display an informed response to the local character of the site the mere replication of past architectural forms is not always appropriate; design should reflect the locality but be honest to its time. The Borough contains some of the best examples of innovative architecture through the past centuries and this continues today. Contemporary design allows the Borough to develop a further layer of townscape which complements rather than competes with the past.

The design response will depend on the complexities of the site. Some examples which may prompt a particular attitude to design include:





"Contemporary design allows the Borough to develop a further layer of townscape which complements rather than competes with the past.."

Homogeneous Context

In places where there already exists a very distinct character, perhaps through the scale and proportions of buildings, the rhythm of fenestration or the use of materials and detailing, new development will need to reflect the prevalent unifying cues. There will be scope for very high quality architectural creativity, however, in some instances a scholarly replica may be the most appropriate approach.



In mixed streets where there is greater variety in character, contextual design cues will be more diverse. This may present the opportunity for a more original approach which follows key components where harmony exists, such as the building line or established building height, but introduces a more distinctive composition.

Creative Context

In some areas there may be little cohesive character or perhaps an undesirable one. Such locations will prompt the opportunity for the most creative responses which seek to create a new sense of character from the enduring characteristics of the site, for example topography or natural features.







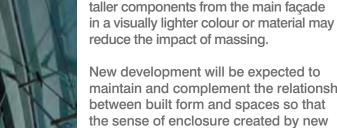
2.2 Continuity and Enclosure - A place where public and private places are clearly distinguished.

The scale, nature and form of a place is defined by the juxtaposition and layout of buildings and the animation of building frontages. Ultimately this refers to the architecture of a place and its visual effect on the observer. For new development to have a positive effect on communities the built form and detailed elevations of the architectural composition should define harmonious, interesting and distinctive places.

Scale

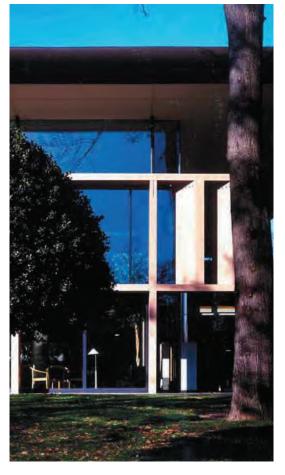
The scale of new development in terms of the width and heights of building frontages should be sympathetic to its surroundings. Many areas of a common scale exist in the Borough from intimate lanes and courtyards to grander mansion blocks and public spaces, characterising areas of a suburban, village or town scale. In such areas established eaves heights and plot widths are likely to dictate the scale of new development and a larger scale of development will be resisted where it may harm the character of the street.

In certain locations, however, intensification may be acceptable. This will require a creative response which balances the scale of development with the massing of neighbouring buildings. To help a proposal 'tie in' with the street scene the building's façade, in terms of the pattern of vertical and horizontal elements, should repeat key horizontal elements such as banding, eaves height or the roofline for example. Additionally the set back of



New development will be expected to maintain and complement the relationship between built form and spaces so that the sense of enclosure created by new development is similar to that of the rest of the street. In urban locations there is likely to be a more intimate or tightly defined relationship characterised by terraced buildings or mews courts, in suburban streets the character will be more open and detached.





Frontage

The building line forms a unifying edge which draws together individual buildings to define a street, this is then given a sense of enclosure by the rhythm of solids and voids. Since many streets in the Borough were built over a short period of time and often by the same developer they are characterised by distinct building lines. These building lines follow regular lines or sinuous curves and to look appropriate within its setting new development should conform to the established set back of neighbouring buildings. In streets where the building line between neighbouring properties is not so distinct, unity can be achieved in two ways. Either a progressive building line between the two can be created or, as may be more suitable in wider frontages, both building lines could be incorporated (perhaps with some progression between the two). A sense of harmony can be achieved through the use of similar design elements such as materials and fenestration.

At corners the sense of enclosure and definition of the street edge should be continued with suitably designed corner buildings that relate to opposing building lines and address all the streets which they front. Corner buildings should also have a relationship with opposing corners and there may be opportunities to reinforce such intersections with a change in scale or building line to highlight the junction. This could be achieved by articulating the mass of the building so that part of it sits forward or behind the building line, creating a 'pinch point' or open area. The Borough contains several interesting corner buildings such as public houses. commercial buildings and homes.









A review of local buildings types may assist the designer in finding an appropriate design response.

The informal security achieved from overlooking windows should be maximised through the location of entrances and habitable rooms so that they look on to the street. The nature and rhythm of such openings can make places feel busier and safer than blank facades. Entrances to buildings should be accessible and visible from the street so that entry and exit can be clearly monitored. Narrow plots increase the frequency of entrances and can thus foster more activity. Shop fronts, in particular, create high levels of interaction between buildings and the street, providing further animation and interest.

Detailing

The formal building lines that are characteristic of the Borough are given further definition through common design and detailing elements that lend a vertical emphasis to facades and a sense of rhythm to the street scene. Where there is a strong prevailing pattern of detailing, new development should harmonise with existing buildings by reiterating the dominant rhythm, height, proportion and plot relationships of the street. With few exceptions care should, however, be taken to avoid pastiche or mere copying and thought should be given to considering how the detailing of facades can be interpreted to provide a fresh approach. In some places there is more variety to the detailing and proportion of facades and it is accepted that the design response can take this into account. The underlying character of the street in terms of the alignment of windows and doors, any set backs or protrusions or common design features such as gables or bay windows may, however, provide some unifying cues.

New development should also have a cohesive design language within the development itself. This will be achieved as much through scale and proportion as detailing and materials. In smaller developments variation in design elements should be limited but in larger developments there may be more opportunity to diversify the street scene through detailing. Where there is variation there should, however, be a common theme and a limited set of references in order to avoid a cluttered design.







Materials

In areas where there is a strong sense of character through the use of particular materials, new development should be based on a similar palette. There may, however, be some opportunity to introduce other materials, and even in historic environments, contemporary materials may offer an elegant contrast to the more 'solid' appearance of traditional materials. Whatever the scope for introducing different materials it is important that there is still some semblance of harmony between new and existing and the compatibility of materials should be based on colour, texture and scale of use.

New development should have a strong identity based on a limited selection of materials. The colour of materials will influence how buildings sit within their landscape and colour should be selected on the basis of integration or emphasis. Contrast is better achieved through alternative applications of the same material in complementary tones rather than complicated and chaotic arrangements of different materials that often have no relationship to each other.

2.3 Public Realm - A place with attractive and successful outdoor areas

The Borough is valued not only for the design of its buildings but also the spaces in between, including the 'public realm' and private gardens and spaces. A wealth of quality open spaces are found in the Borough ranging from the internationally renowned Royal Botanical Gardens at Kew (a World Heritage Site) to lesser but 'nonetheless' important spaces such as streets, squares and neighbourhood parks which effect our everyday lives. New development should make a positive contribution to the public life between buildings so that these spaces are pleasant, flexible, safe and interesting places to be in. The creation of 'place' amounts to more than a collection of buildings and private spaces.

Public Realm Network

At the concept stage, before any detailed architectural design is undertaken, it is important that equal thought is given to outdoor areas. Public space should be planned in a strategic manner so that it plays a useful contribution to new development, exploiting its amenity and ecological value and assisting in the creation of a place. Thought should always be given to the scale of public realm in relation to the amount of development and there will be a preference for well located and defined open space as opposed to large but otherwise poorly thought through proposals. Such strategic thinking will have long term benefits in terms of the practicality, amenity, economy, aesthetics and security of the public realm.



All proposals are likely to supplement the public realm in some way and in its most basic form the street and a buildings relationship with it will be the main consideration. The Borough is recognisable for its tree lined streets and avenues and new development will be expected to supplement and enhance this enduring character. In all but the most traffic intensive proposals, new routes should be designed on the basis of shared use streets which centre on the experience of the pedestrian and cyclist as opposed to access for the motorist (see 2.5 Ease of Movement for further advice).

Delineation and Definition

New open space such as squares, courtyards and pocket parks should have an intended and feasible use which fosters social activity to ensure that it makes a positive contribution to both the development and the local area. Public space located in highly visible, well overlooked and busy places is likely to be more successful and can create an attractive focal point to development. Many examples of high quality open space exist in the Borough from the traditional greens of Richmond, Twickenham or Kew to modern developments such as Parklevs in Ham or Mallard Place in Twickenham. In order to foster activity, new public spaces should be integrated with a convenient and attractive movement structure so that people can pass through or linger where appropriate. Places feel safer when there are lots of people and the safety and security of the public realm should be based on generating activity and natural surveillance in the first place rather than additional security measures such as CCTV cameras.

Existing on site characteristics can help to define the nature or location of open space. Natural features not only have an ecological value but can also create a mature setting for the development. There should always be a preference for the protection of any existing natural habitats or trees. This will enhance the potential for open space to support neighbouring wildlife through the forming of wildlife or 'green' corridors. The appraisal stage will also reveal other site characteristics which may provide a useful setting or basis for open space

Building proposals fronting new or existing areas of public space (including streets) should articulate the space through their layout and there should be an adequate sense of enclosure. To create adequate enclosure and avoid spaces that are out of scale, the heights of building frontages will need to have a proportional relationship to the size of the space.

such as an interesting view or a retained

natural feature.





Public Realm Design

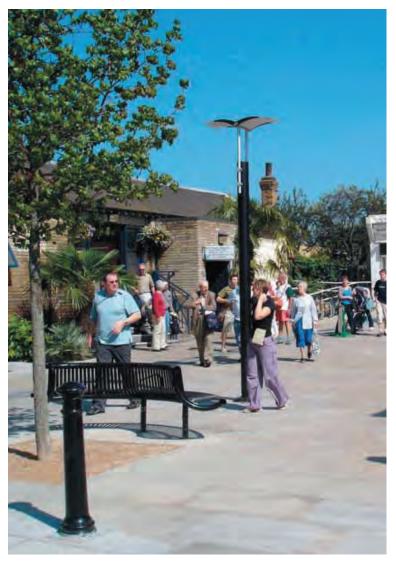
Having established the basic location and form of the public realm the detailed landscape design of surfaces, street furniture and planting will need to be designed in co-operation with the architectural design of buildings so that the final proposal is coordinated. Where possible any existing traditional paving materials such as cobbles or York stone paying should be retained. New materials should be selected on the basis of colour and texture so that they match or contrast with the tones of landscape and building materials, however, the palette of materials must be kept to a minimum.

The design of open spaces should be simple and avoid excessive street 'clutter' through the coordinated and sparing use of street furniture. An inundation of safety barriers, traffic bollards and signage for example can create obstacles to movement. Street furniture should relate well to the appearance and use of the public realm and promote interesting and usable spaces. In the interests of security the public realm will need to be well lit and high pressure sodium (white light) is generally used in preference to amber light.

The Council will seek where appropriate the 'percent for the arts' scheme, whereby an element of public art is incorporated into new public and private building developments. It is, however, important that the commissioning of public art is not an isolated process of selecting a set 'piece.' Public art should be viewed in its widest sense as the detailed design of buildings and public realm may incorporate opportunities

for public art. Footway design, street furniture and lighting effects are all opportunities for public art and the involvement of an artist professional from an early stage may generate a more interesting design response.

The Borough has produced a **Public Space Design Guide** where more detailed information can be found on public realm design.



2.4 Ease of Movement - A place that is easy to move around and get to

The quality of movement linkages is important since it affects people's experience of the public realm in terms of how they get about and how busy and safe a place feels. People prefer places which are easy to walk around and where traffic does not dominate. New development will need to reconcile the various kinds of movement that a development will generate to create an inclusive and interesting environment.

Street Structure

The movement structure should be defined at the concept stage since it will provide the basic framework for public space and buildings. Movement should not necessarily dominate the location of development. It is important that the network of routes is identified at an early stage so that a permeable and legible structure is formed. Permeable streets provide a series of connections as opposed to dead end or cul-de-sac streets and are preferable since they promote activity in the public realm and can thus feel safer.

The basic network will be informed by the surrounding pattern of routes, dominant land uses and local services identified during the context and character appraisal as well as the proposed use of the development; good connections to the surrounding network is essential. The appraisal will ascertain how existing and proposed users may get to and move around the site and identify opportunities for new



connections based on desire lines. In less intensive places where there may be less opportunity for passers by, it is better to concentrate movement on existing routes where there is more opportunity for natural surveillance.

Pedestrian Priority

New routes and connections should prioritise pedestrians and be based on the tradition of shared use streets. overlooked and enclosed by buildings. Separate pedestrian routes to the rear of properties should always be avoided. There are, however, several examples of interesting segregated routes such as the pedestrian lanes of Richmond. New segregated pedestrian routes will need the utmost consideration since the surveillance potential of passing traffic can make places feel safer. Where pedestrian only routes are planned they should be located in highly visible, busy or overlooked locations and have good levels of lighting.

Any new road proposals are unlikely to be of sufficient scale to serve more than the immediate vicinity of development, opening up the opportunity for a pedestrian centred approach to the road layout. Minor streets in the hierarchy will tend to define a low key setting for development and the carriageway will need to be designed accordingly to reflect low levels of traffic penetration and slow travelling speeds. It is essential, however, that the design and layout of buildings in relation to the street is used to influence driver behaviour rather than the use of 'add on' measures such as speed humps. In traditional layouts a traffic calming effect

has persisted through the obstruction of forward vision as a result of tight corners, short sight lines and frequent junctions and where the design of buildings can create such an effect the overall composition is likely to appear more attractive. In some instances it may also be possible to create a shared surface route without a separate footway. Such arrangements should be designed to make motorists feel and act as visitors, slowing traffic to a walking pace and may be acceptable in certain types and scales of development, particularly for housing.

In many proposals there will be a requirement for an element of car parking within the Council's maximum parking standards, however, the demands of car parking can often be in conflict with the quality of place. It is important that car parking areas are designed to accommodate vehicles in a manner which reduces the vastness that large areas of parked cars can create. This can be achieved through the location of parking within the interior of development blocks so that they are hidden from open view. Areas should also be broken up into more manageable areas through the juxtaposition of buildings and planting and the use of surfacing materials to reduce the impact of tarmac. Safe and convenient routes through areas of parking can also soften the dominance of cars. Permeable materials should be used wherever possible to reduce run off.







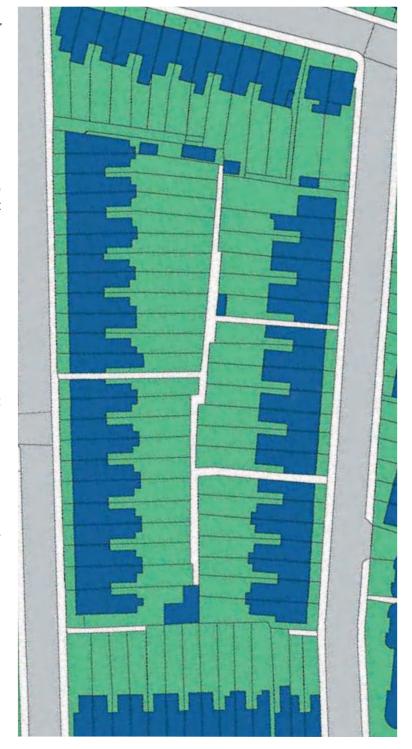
2.5 Legibility - A place that has a clear image and is easy to understand

The term legibility is a measure of the ease with which the various parts of the townscape can be understood and organised into a coherent pattern of buildings and the routes and spaces between them. People feel more comfortable in places which have good legibility and a clear structure since they are easier to comprehend and thus move about in. New development should contribute to legible and memorable townscape.

Development Blocks

The Borough's street patterns form an identifiable network of streets, some regular and grid like, others organic and sinuous. A grid like network assists in legibility as streets follow a logical route. New development should contribute to the block structure of the Borough The context and character appraisal will identify the appropriate pattern of streets for a site.

As well as creating an understandable movement network the principle of the development block can also satisfy safety and security needs. Within the alignment of streets development parcels are formed. This arrangement creates a secure island of development whereby building elevations frame and overlook adjoining streets (providing natural surveillance) and in turn enclose and defend the rear open spaces of properties.



Way-finding

It is important that any opportunities to assist in way finding identified at the context and character appraisal stage are used to influence the movement network. Of particular consequence will be an understanding of the site's topography, views into and out of the site as well as existing and possible locations for landmarks.

Memorable and navigable townscape is often the result of a sequence of views terminated with landmarks. An understanding of the local context and its effect on views into and out of the site should influence the layout of streets in terms of any opportunities to exploit sight lines. Focal points should then be created where they can aid legibility, typically at corners or gateway locations to signal an entrance or particular use. The skyline of the Borough is punctuated with spires, towers and corner features that sit above the established eaves height and this may be appropriate in certain locations when of the highest architectural quality. Significant skyline features will, however, be resisted, especially in historic or sensitive locations such as Richmond Hill. The topography of a site can highlight any dominant buildings and in general it is important that development follows the form of the land through a series of tiers relating to the site's topography rather than significant areas of cut and fill.





2.6 Adaptability - A place that can be adapted easily

The flexibility of many of the Borough's traditional buildings and environments has ensured their continual use giving them a sense of permanence. This adaptability has spared the cost and trauma of demolition and secured layers of history within the urban environment. New developments should adapt to the complexities of urban life in order to meet changing needs and aspirations as the Borough matures.

Reusing Older Buildings

The retention, refurbishment and reuse of historic or older buildings should be considered where, as a result of the context and character appraisal, they are deemed to make a positive contribution to the site. Not only does the existing built environment contain an amount of embodied energy which can be preserved through refurbishment but the built heritage of the Borough defines the character of place. Buildings often become redundant when their original use has expired and it is important that if a similar use cannot be incorporated an alternative is found. New uses should not harm the character, appearance, setting or original fabric of a historical building. Adaptation to new uses should bring old buildings to life, but should be essentially compatible with their character, appearance, fabric and setting.

Any change of use to a building will ideally involve little change to the valued elements of its built appearance. However, in some cases where change of use cannot be achieved solely through



the redesign of internal space, or ill considered alterations can be remedied, exterior alterations may be necessary. Where such alterations are required the architectural integrity of the building should not be lost and extensions which overwhelm the scale of the original building and are disproportionate to a building's established mass, fenestration pattern and rhythm will not be acceptable. Alterations do not necessarily need to be built in a traditional style and contemporary design may offer convincing results.

Changes of use and refurbishment also need to consider the setting of the building. Car parking, plant equipment and service needs can all harm the final proposal and will need to be particularly sensitive to the character of the building.

Flexible Buildings

Adaptable buildings allow users to personalise and adjust their local environment as their needs change. Designing for adaptability can be somewhat complicated, as changing social, environmental and technological needs are difficult to predict over a long lifespan. Fortunately the Borough was mostly spared from the large scale redevelopments of the mid to late twentieth century that have proved less suited to modification. The Borough's typically domestic scale has allowed individual buildings to adapt without the need for major intervention. New development should respect this fact even where opportunities for a proportionally larger scale of development exist. The Richmond Riverside development for example,

accommodates a significant amount of development but within a traditional scale of townscape which will allow the various forms and activities it accommodates to adapt independently.

Sustainable Development

In view of the heightened environmental consciousness in planning and design it is important that proposals have a low impact on the natural environment not only in terms of construction but operation as well. The predicted reduction in natural resources in the future could seriously affect the function of buildings if they are reliant on a high consumption of energy and are unable to adapt. The Council is to publish a 'Sustainable Construction' checklist to influence those making planning applications to take a more considered response to sustainability and developers of major applications will be expected to follow this advice.



2.7 Diversity - A place with variety and choice

It is a responsibility of the planning system to secure development which is non-discriminatory and provides for the needs of all. Such social diversity sustains vibrant and mixed places which are also more interesting and adaptable. In the interests of social inclusion new development should cater for the wide range of lifestyles and activities that sustain communities.

Inclusive Design

New development should be accessible to all, and under the requirements of the Building Regulations Part M (Access to and Use of Buildings) new non-domestic development should provide for the needs of people with impaired mobility. Such a requirement has wider benefits not only for disabled people but for everybody, particularly elderly people, people with pushchairs or prams and delivery services. The Council additionally supports proposals which increase the supply of wheelchair accessible housing.

At the concept stage opportunities to exploit the accessibility of new development will need to be considered. Topography and the existing movement network will have most consequence on the layout of buildings which should ideally connect with the existing public realm in a direct and unhindered manner, free from steep slopes (more than 1:20) and barriers or clutter. Building entrances should thus be located where they are most accessible to the pedestrian, taking advantage of crossing points, public transport stops and the building's street frontage.

Mixed Uses and Sizes

Within the Borough's main centres and even in some outer lying suburban areas there is more than one land use. These mixed use areas, combining living, working, leisure or recreation uses help to make the Borough a more vibrant and interesting place to be and can also reduce the need to travel. Within existing mixed use areas or at particularly accessible locations (near a train station for example) the Council is keen to consider opportunities to introduce a variety of uses.

In view of the relatively intensive use of land in the Borough a mixture of uses on any one site is more likely to be vertically rather than laterally arranged and upper floors offer scope to widen the range of activities. Offices or residential accommodation increase the possibility for natural surveillance and can help to animate the public realm when directly accessible from the street. Not all uses will be compatible with each other and where mixed use proposals involve residential development, consideration will need to be given to how design can best mitigate any 'un-neighbourly' issues such as loss of privacy, pollution, visual intrusion, noise and disturbance. Primarily, this will involve the clear separation of different uses both internally and externally through zoning and design in order to delineate distinct access arrangements, servicing and car parking for example.

Whether development is designed for a single use or a mix of uses, diversity can also be introduced by providing a variety of 'unit' sizes. Smaller house types mixed with family homes, can for example, widen the opportunities for first time buyers and provide a mixed community. Smaller commercial, retail or leisure units can also provide niche accommodation for business start ups and small firms



