



RICHMOND BOROUGH COUNCIL

Town and Country Planning Act 1990 (as amended)

Planning and Compulsory Purchase Act 2004

The Town and Country Planning (Determination by Inspectors)

(Inquiries Procedure) (England) Rules 2000 (as amended)

PROOF OF EVIDENCE

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IHBC, RECOGNISED PRACTITIONER URBAN DESIGN**

on behalf of London Borough of Richmond

Site: 23-27 Arlington Works, Arlington Road Twickenham TW1 2BB

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Contents Page

1.0 Qualifications and experience	2
2.0 Introduction	3
3.0 Reasons for refusal	4
4.0 Existing site context	5
5.0 Relationship of proposed development to existing buildings and context	7
• Layout, Height, Scale and Massing of proposed development	
• Townscape, Streetscape and Visual dominance	
6.0 Impact on the setting of Buildings of Townscape Merit	22
7.0 Statement of Disagreement	28
8.0 Summary and Conclusion	30

1.0 Qualifications and experience

- 1.1 My name is Barry Sellers. I am a Principal Planner (Urban Design and Conservation) who manages the Urban Design and Conservation Team for both Wandsworth and Richmond Councils. I joined Wandsworth Borough Council in April 1988 and have 32 years' experience working in the borough and 4 years' experience of working in Richmond.
- 1.2 I am a Chartered Town Planner since 1981, holding a BA degree in Town Planning. I am a Recognised Practitioner in Urban Design, which I have held for the last 6 years, and have both a Diploma and a Masters' degree in Urban Design. I am also a Chartered Member of the Institute for Historic Building Conservation (IHBC).
- 1.3 I have worked in Urban Design and Conservation in the London Borough of Lewisham and Southampton City Council as well as a planning officer with Rushmoor Borough Council. Altogether I have over 43 years of experience in local government. For the last 32 years I have worked in Wandsworth and for most of that time as Principal Planner (Urban Design & Conservation) for the local authority and have had responsibility for Richmond since 2016 as part of a Shared-Service arrangement.
- 1.4 I was Chair of the Urban Design Group in 2004-2006 and have given lectures in urban design both in the UK and overseas.
- 1.5 The evidence which I have prepared and provide for this appeal in this proof of evidence is true and has been prepared and is given in accordance with the guidance of my professional institutions the RTPI, IHBC and I confirm that the opinions expressed are my true and professional opinions.

2.0 Introduction

2.1 My Proof of Evidence has been prepared for Richmond Borough Council. It relates to a planning appeal submitted pursuant to Section 78 of the Town and Country Planning Act 1990 concerning land at 23-27 Arlington Works, Arlington Road, Twickenham, TW1 2BB.

2.2 My Proof of Evidence deals with the urban design matters raised in the reasons for refusal, and in particular the issues of the appeal scheme's layout, height, scale, massing, and context together with its impact on the streetscape and townscape.

2.3 My evidence should be read alongside that of the witnesses notably the Fiona Dyson, and other specialists, Alan Potter, Scott Davidson, Paul Bradbury, Steve Marshall and Will Marshall.

2.4 The planning application for the site was made on 10 August 2018. The officer's report was submitted to the Planning Applications Committee on 18 September 2019. The Committee received representations in support and against the application. The Committee discussed the application. Members were of view that the officer's report provided a strong case for refusal and the committee were minded to agree with the officer's recommendation.

3.0 Reasons for Refusal

There were eight reasons for refusal given as to why the proposed development is unacceptable. I will focus on Design matters as part of my evidence. I discuss this matter in terms of the relevant policy set out in the National Planning Framework (NPPF) (CDA 1), the National Design Guide (CDA 3), London Plan (CDB 2) and Local Plan (CDB 1).

U0069285 Design

The proposed development, by reason of its siting, footprint, mass and of the severe horizontal emphasis of the eastern elevation of the proposed main residential building, combined with the height and siting of the proposed smaller residential building, would result in a cramped and contrived form of over development of the site, and would appear overbearing on the existing Buildings of Townscape Merit (BTM) on site. The proposed development is therefore contrary to policy, in particular, the NPPF and policies 3.5 and 7.4 of the London Plan (2016), LP1, LP4 and LP39 of the Local Plan (2018) and the Design Quality SPD.

4.0 Existing site context

4.1 The existing site context is set out on pages 5-6 of the Committee Report (CDH 6).

4.2 Additionally, the access to the site forms part of Arlington Road albeit a privately maintained route that is surfaced in concrete. This route is shown on historic maps of 1912-15 (CDH 1 Fig 1 below) and forms part of the character of the site. Car parking along the entrance to this access route is arranged perpendicular to the carriageway. The entrance is also gated before entering the site proper. It is not known what the rights over this access route are from the users.

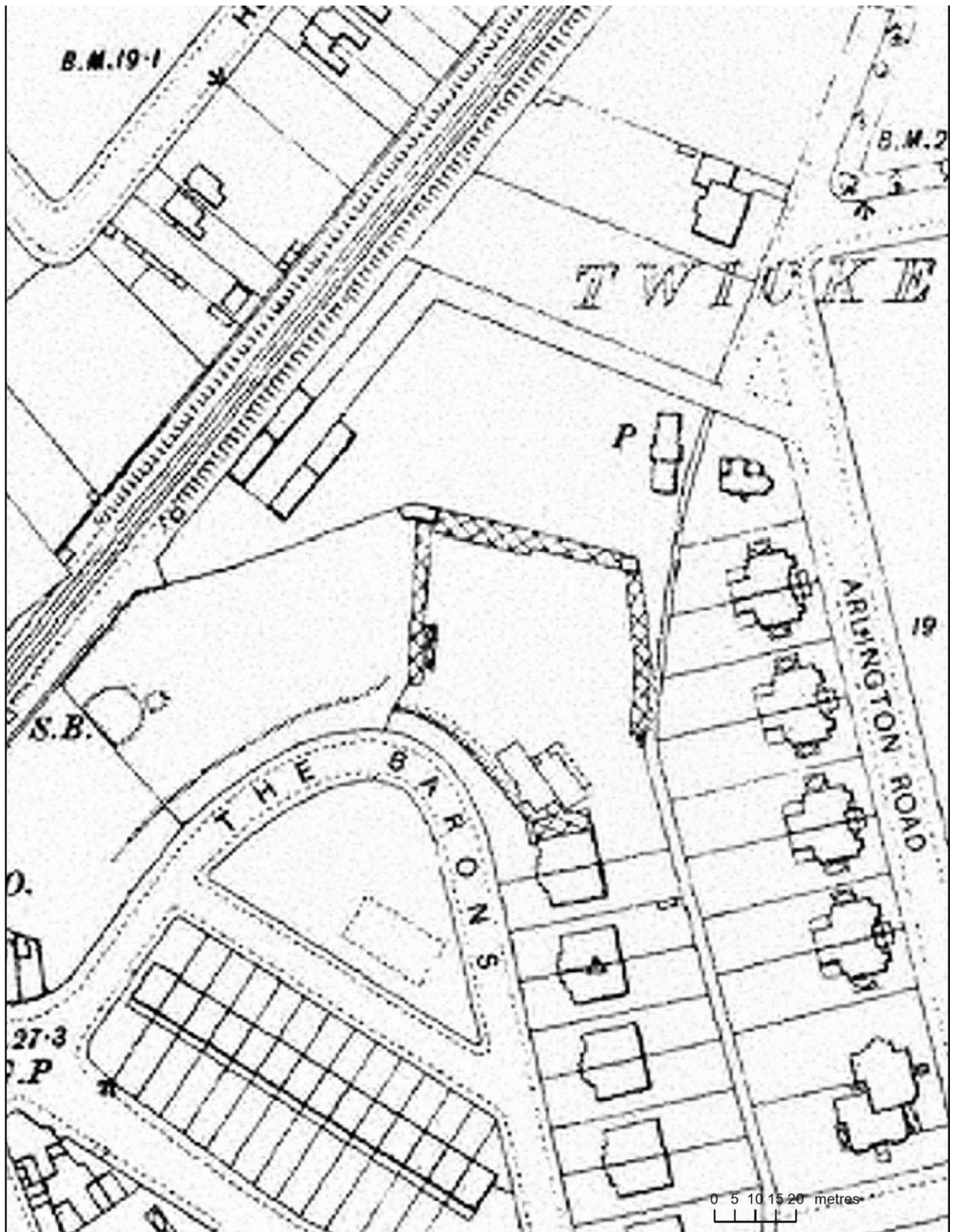


Fig 1: 1912-15 Historic Map

5.0 Relationship of proposed development to existing buildings and context

5.1 In this chapter I examine the proposed development subject of this appeal, firstly in terms of its layout, height, scale and massing; and secondly in terms of its Townscape, Streetscape and Visual dominance within the site.

Layout, Height, Scale and Massing of proposed development

5.2 The NPPF (CDA 1) chapter 12 sets out the Government's approach to achieving well-designed places. Paragraph 124 says, 'the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve.'

5.3 The National Design Guide (CDA 3) forms part of the Government's guidance to be read alongside the NPPF. Paragraph 42 says:

'Well-designed new development is integrated into its wider surroundings, physically, socially and visually. It is carefully sited and designed, and is demonstrably based on an understanding of the existing situation, including:

- the landscape character and how places or developments sit within the landscape, to influence the siting of new development and how natural features are retained or incorporated into it;
- patterns of built form, including local precedents for routes and spaces and the built form around them, to inform the layout, form and scale;
- the architecture prevalent in the area, including the local vernacular and other precedents that contribute to local character, to inform the form, scale, appearance, details and materials of new development.
- uses and facilities, including identifying local needs and demands that well-located new facilities may satisfy; and
- public spaces, including their characteristic landscape design and details, both hard and soft'.

5.4 The Adopted London Plan (CDB 2) Policy 3.5 on the quality and design of housing developments says these should be of the highest quality internally, externally and in relation to their context and to the wider environment. Policy 7.4 says 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. In my opinion the proposed development fails to provide the quality in relation to context and fails to have regard to the form of the area and the scale and mass of surrounding residential buildings as a result of the over development of the site.

5.5 The Intend to Publish draft London Plan (CDD 1) Policy D3 on optimising site capacity through the design-led approach says that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. The Policy emphasises that development proposals should, 'enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.' In my opinion the proposed development fails to respond to the local distinctiveness of East Twickenham as well as through its layout, scale, appearance and shape as a result of the over development of the site.

5.6 The East Twickenham Village Planning Guidance SPD (CDC 3) adopted in June 2016 identifies the general character of the surrounding area. The Appeal site falls within Character Area 11 within the Village Plan. 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 Margaret's 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.

5.7 The east side of Arlington Road is made up of two-storey semi-detached houses with inset, round headed porches and rendered elevations. On the west side are blocks of flats from the first half of the twentieth century. By and large, these are unremarkable, but some have attractive Art Deco detailing.

5.8 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.

5.9 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.

5.10 Characteristic materials and features to the area include: red brick, stock brick, render, pebbledash, clay tiles, 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.

5.11 Local Plan policy LP1 (CDB 1) says, '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'. This policy sets out six criteria:

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 co-location of uses through the layout, design and management of the site.

5.12 In terms of LP 1 (1) above I accept that the character of the site and surroundings is varied but focussing on the retained buildings then this is a starting point for developing an appropriate built form. The appellant's proposal ignores the fact that the site is allocated for industrial use and therefore the proposed residential use must be considered as an 'opportunity'. Whilst the existing Victorian BTMs (stable blocks) have been retained the appellant seeks to develop a massing and scale inappropriate to their setting and isolating them rather than integrating them into a

scheme. The two uses in different buildings stand in complete separation in terms of layout, form, scale, character and spatial arrangement which makes for an unsatisfactory urban design quality overall, which is symptomatic of the over development of the site.

5.13 The Council's SPD on 'Design Quality' (CDC 2) says that '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 off the shelf designs'.

5.14 In terms of the scale and massing of the proposed development the proposed four storey residential block imposes itself on the site to the detriment of the established buildings, which are represented by the two storey BTMs (stable blocks). It represents an over-intensive use of a restricted site. The scale and intensity of development for what is a backland site (Policy LP 39) is unpleasantly over-powering and visually dominant.

5.15 The case officer's report refers to the strong horizontal emphasis of the front elevation as part of the scale and massing. This is exacerbated by the strong horizontal lines of balconies (Fig.2) (CDG 3), which although projecting does highlight their visual dominance. The scale of the front elevation is not broken up to the same degree as the rear elevation, whereby the cores help to visually break up the scale of the elevation. The entrances to the cores from the front are recessed and appear rather inconsequential whereas they should be celebrated to give a more welcoming appearance.

5.16 The strong horizontal form of the building is reinforced by the repetitive nature of the projecting brick balconies to each floor. These visually dominate the front elevation to the extent they overwhelm and do not

represent a prevailing characteristic feature of urban form in the locality and completely out of context with the BTM (stable block).



Fig 2: Front elevation

5.17 The four-storey massing and footprint of the main residential block ignores the existing spatial character of the BTMs (stable blocks) and gives the impression of a contrived urban form of an uncharacteristic typology shoe-horned into the site simply to maximise the number of residential units.

5.18 Whilst height per se is not the issue it is the combination of height, form, scale and footprint which sets the proposed building apart from the prevailing character of this part of East Twickenham, which is dominated by smaller scale two-storey semi-detached properties.

5.19 In terms of LP 1 (3) above the case officer's report (CDH 6) (p.25) draws on paragraph 127 of the NPPF (CDA 1) to say, 'New developments are encouraged to respond to local character and history and reflect the identity of local surroundings and materials'. Paragraph 127 goes on to say that, 'new developments establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit'. In this regard the proposed layout ignores the original street alignment of Arlington Road as it entered the site as shown on historic maps (CDH 1). It does this

by setting out the footprint of the four-storey building across the existing street arrangement obliterating it completely. Hence the reason for refusal referring to the siting and footprint of the proposed four storey residential building which results in a contrived form of over development of the site. Had the scheme adhered to the historic street alignment there would be direct connectivity to the retained BTMs (stable blocks), rather than the proposed disconnectedness.

5.20 In terms of LP 1 (4) above the existing retained buildings have an intimacy of scale, and this is reflected in the BTMs (Mews stable block buildings), whereas the proposed scheme fails to respect the character of these buildings. The proposed public realm deviates from the historic route and is considerably wider with cars parked perpendicular to the street giving a different spatial scale and character to the established Mews, which is around 6-7 m in width. The re-aligned street shown on the proposed site plan (CDF 3) fails to respond to either the established character of the Mews street, which is fronted by buildings or indeed the character of surrounding residential streets with their generosity of space and being lined with trees. The footprint and siting of the four-storey residential building is spread across the existing access road to the Mews ignoring its context contrary to London Plan (CDB 2) Policy 7.4. That footprint is then taken up to four storeys in height across the site to the extent that it visually dominates the site. As a consequence, the remaining external space results in pocket sized 4 m long rear gardens and an absence of front gardens apart from balconies at ground floor. This is a clear departure from the prevailing residential character. When taken as a whole in the context the proposal represents an over development of the site.

5.21 In terms of LP 1 (5) above the existing site is a cul-de-sac and there is no opportunity to provide a permeable route through the site beyond the Mews to the stable blocks, unless it were developed in conjunction with the Twickenham Film Studios site to the south, in which case a route through to St Margaret's Station could be contemplated. This would offer great

benefits to the scheme reducing the walking distance to the station. However, the retention of the permeable route through to the Mews is obliterated by the siting and footprint of the proposed four storey residential building, which gives rise to a cramped and contrived form of development. Whilst natural surveillance can be afforded from the front of the residential units this would only be so if the proposed hedges were kept low. The existing site is gated and with a line drawn across the entrance on the proposed site plan (CDF 3) there is a suggestion that it would be gated which is contrary to policy LP 1 (5).

5.22 Access to the commercial uses in the site layout (CDF 3) is via the shared surface route with residential use on the ground floor. This could give rise to potential conflicts between commercial vehicles and residential activities, particularly children's play.

5.23 Given the existing commercial nature of the site I question the rationale for the urban design quality of the proposals. The existing group of BTMs (former stable block buildings) in the southwestern corner and the cobbled Mews street provide the ingredients for building upon this established character. Instead the four-storey residential block is sited in front of the entry to the Mews completely disregarding the existing spatial form and character. There is no integration of uses, built form or public realm; instead the residential and commercial components represent a complete separateness. Consequently, the siting, footprint, scale, height and mass of the proposed four storey main residential building would result in a cramped and contrived form of over development.

5.24 The layout of the proposed four storey main residential building has five units to the ground floor with three dual aspect units and two single aspect units (CDF 3). There are no front doors to individual residential units on to the street as all the units on the ground floor are accessed from the two cores. The ground floor units have access to small pocket-sized rear yards, and only balconies enclosed by a brick wall and hedges at the front, which

depart markedly from the character and appearance of the surrounding residential area, again giving an indication of the cramped form of development indicative of the over development of the site.

5.25 The ground floor units overlook the shared surface route which is lined with rows of parked cars perpendicular to the street. As the perspective (CDF 6) (Fig.3) shows this will not be a welcoming or pleasing outlook for future residents of the ground floor, again symptomatic of the cramped and contrived form of development.



Fig. 3 Perspective

5.26 The height of the proposed main residential building is four storeys which for an infill backland site adjacent to the rear gardens of Howmic Court appears excessive, imposing and over dominant, whereas development to the rear should reflect the subsidiarity of the location, insofar as it is far removed from the frontage road. Policy LP 39 requires infill development to retain similar spacing between new buildings to established

spacing. The proposed development does not retain the spatial character of the surrounding residential development, hence its scale, siting and footprint results in a cramped and contrived form of over development of the site. Moreover, the case officer's report (CDH 6) states on p.27 that, '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'. Above that is a roof storey. The height and massing would have an over dominant relationship to the BTMs in view of their proximity of around 5 metres separation.

5.27 The height of the three-storey building is sited immediately adjoining the easternmost Building of Townscape Merit resulting in an uncharacteristic and awkward juxtaposition. As a consequence, its scale, mass and height have an overbearing impact on the BTMs as illustrated in fig. 4 (CDF 10) below.



Fig. 4 Elevations of smaller residential block

5.28 Local Plan policy LP1 requires consideration of criteria to ensure development respects, contributes to and enhances the local environment and character. The proposed four storey building presents an abrupt wall of development facing the Mews street containing the BTMs, being substantially higher than the existing two storey development. The proposed smaller three storey building abuts the rear elevation of the two storey Mews building (BTM). Both buildings are considered to have a harmful effect upon the significance of the setting of the BTMs, as reflected in paragraph 197 of the June 2019 NPPF (CDA 1). This matter is considered in paragraph 6.0 below.

5.29 The false Mansard roof to the residential blocks is not a characteristic architectural feature of the local area, nor are the brick balconies. They reinforce the notion that the design of the proposed development draws little inspiration from the prevailing character and appearance of the surrounding residential properties or indeed from the retained BTMs (stable block buildings). The box-shaped false Mansard typology of the roof form and its materiality are not representative of the prevailing architectural vocabulary of the residential properties in the immediate vicinity of the site, and therefore contrary to Policy LP1. The false Mansard typology represents an architectural device in an attempt to visually reduce the scale of the massing and height of the proposed residential buildings but is symptomatic of the over development of the site. This is because the false Mansard roof has vertical walls, as opposed to a traditional pitch enabling accommodation to be pushed towards the edges of the building.

Townscape, Streetscape and Visual dominance

5.30 As a piece of townscape, I find the proposed development bears little relationship between the two uses and built form or indeed the surrounding residential development and its attendant streetscape. The proposed four storey block has not been well considered spatially with the two BTMs

(stable blocks). Rather than utilising the existing access road leading to the Mews and integrating the forms and uses the appellants spatially separate them. London Plan Policy 7.4 (CDB 2) says that, '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'. The proposed development fails to build on the positive elements of the site, notably the two BTMS (stable blocks and cobbled Mews street) and instead of working with the grain of development isolates them by imposing a four storey mass with a substantial footprint in front of the entrance to the Mews signalling that they are not an integral part of the place-making for the site.

5.31 The predominant character of Arlington Road is residential with two storey semi-detached properties prevailing, though I acknowledge a few mansion blocks exist on the western side of the road. The residential properties all benefit from substantial gardens with generous landscape including many trees. The proposed main four storey residential building is at variance with the established townscape and streetscape as it is a backland site with no effective street frontage as Arlington Road has been re-routed to run alongside the Twickenham Film Studios, simply to accommodate the large spatial footprint of the four storey residential building. The spatial character neither draws upon the generosity of prevailing character of Arlington Road or indeed of the intimacy of the Mews to the BTMs. Its spatial character is dictated by its siting, footprint and scale, mass and height, which result in a cramped and contrived form of development.

5.32 The proposed four storey building assumes a disproportionate significance within the site in terms of height, scale and massing for this backland infill site contrary to Local Plan policy LP 39. The grain of residential properties in Arlington Road is generally much finer, with smaller plot sizes and spatial footprints. The proposed footprint is considerably larger than those prevailing elsewhere in Arlington Road, and the few

Mansion blocks have much larger plots with generous gardens. The garden spaces to the properties in the surrounding residential areas are considerably more generous compared with the four-storey block which occupies a significant part of the appeal site, with relatively small area for gardens.

5.33 Whilst the residential properties to the west of the site over the railway in Heathcote Road are over 20 m distant in terms of habitable rooms the outlook from the rear gardens of nos. 2-12 would be adversely changed as a result of the proximity of the proposed four storey residential building (fig. 5), which would appear excessively imposing, intrusive, overbearing and over dominant. Elsewhere across the railway the residential properties are considerably further away and generally lower in height and smaller in scale. However, the proposed four storey block would loom over their rear gardens having an adverse impact on their enjoyment particularly in terms of outlook.

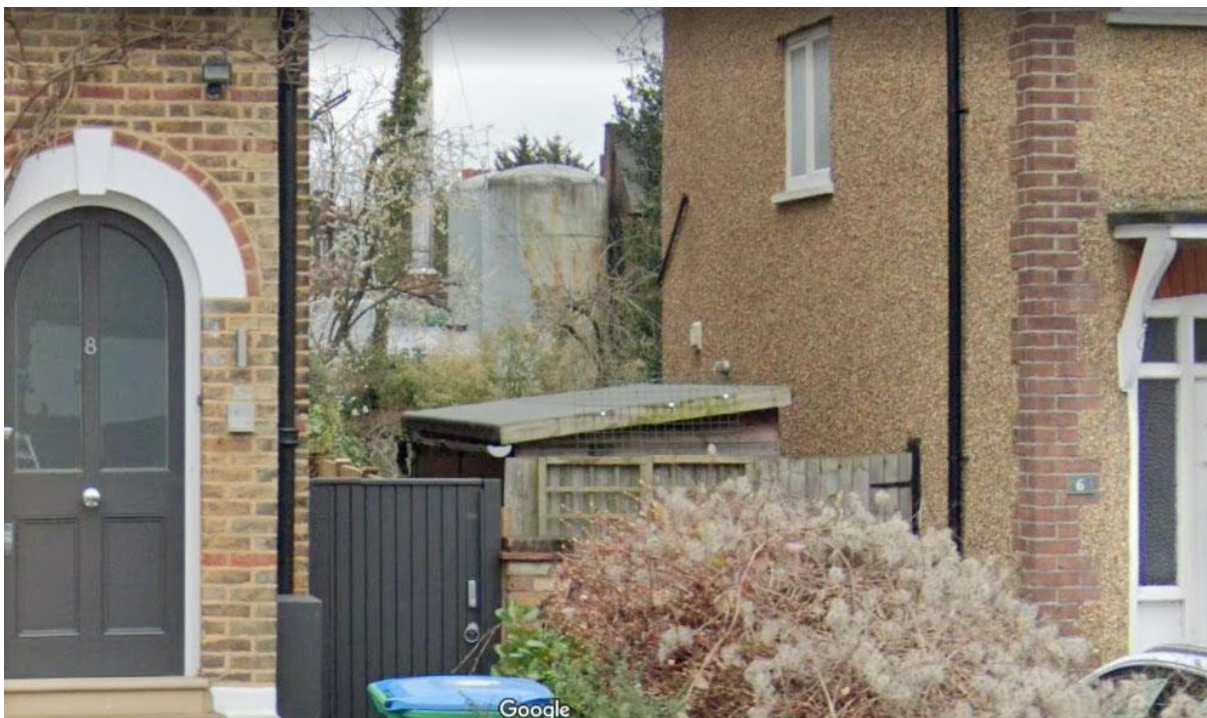


Fig. 5 View between nos. 6 & 8 Heathcote Road showing two storey BTM

5.34 The case officer's report (CDH 6) (p.26) says, '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 Margaret's Road to the south west of the site.

5.35 The case officer is correct to highlight this view. The townscape view from St. Margaret's Road railway bridge northwards is characterised by a well treed landscape uninterrupted by buildings (see fig 6).

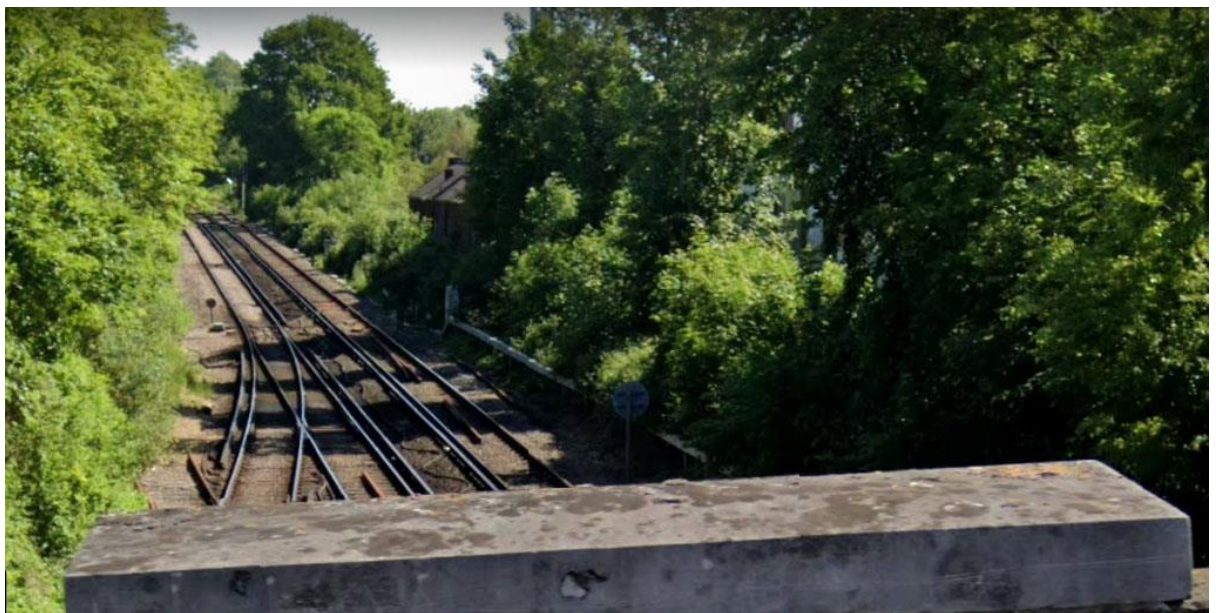


Fig. 6: View north from St Margaret's Road bridge

5.36 This is a key view enjoyed by people going to and from the railway station. In the view the roof of one of the two storey BTMs (stable buildings) is discernible. However, in my opinion the proposed four storey building would become a visually dominant feature in this landscape, and one which would be detrimental to this cherished view. The planting visible just beyond the BTMs is mainly small shrubs which are lineside, and these would not screen the proposed four storey main building which would be visible above the BTMs. There is no analysis of this view by the appellants and no CGI to understand the potential impact of the proposed development.

5.37 Although the appellants propose tree planting along the boundary with the railway these are unlikely to be significant trees as they would be planted 4 metres from the building as the canopies would interfere with sunlight/daylight to the proposed residential units due to the proximity of the windows to the rear façade.

6.0 Impact on the setting of Buildings of Townscape Merit

6.1 The NPPG 2019 (CDA 2) requires non-designated heritage assets to be formally identified, such as through the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Richmond keeps a list (CDC 8) of non-designated heritage assets on the website. Arlington works were added to the list on 06.09.2013. This complies with the process set out in the NPPG as they have sufficient heritage significance to warrant identification as non-designated heritage assets.

6.2 The application site contains two Buildings of Townscape Merit, which are located in the southwestern corner of the site. These are Victorian terraced Mews, previously used as stable blocks with first floor residential accommodation. Currently these buildings are believed to be used as office/workshop space as set out in the DAS (CDF 22).

6.3 The NDG (CDA 1) says of the integration of heritage with new development in paragraph 45;

‘When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape’.

6.4 Moreover, paragraph 47 of the NDG (CDA 3) says;

‘Well-designed places and buildings are influenced positively by:

- the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;’

- 6.5 The significance and setting of the existing heritage assets are largely ignored by the proposed development as the proposed layout, form and massing turns its back on the existing BTMs (stable block) and the character of the Mews, which forms part of the designation.
- 6.6 In the appellants DAS (CDF 22) it says of the BTM (stable block), 'It is not a BTM that is accessible or open to public view. It is a historical remnant tucked to the rear of a private site. As proposed, this arrangement will inevitably remain the same'. Therefore, it is clear from this statement that the appellants set about the site without any clear purpose of integrating these buildings into the wider development of the site.
- 6.7 The Local Plan Policy LP 4 seeks to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit. On page 41 of the Officer's report (CDH 6) it says, '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'. I concur with that view as they are left isolated in the south west corner of the site.
- 6.8 On p.27 of the case officer's report (CDH 6) reference is made to the disparity in height between the BTMs (stable block) and the proposed height of the main residential building giving a height difference of four metres. This is illustrated in the perspective (fig. 7) (CDF 7).
- 6.9 As a consequence, the impact on the setting of these non-designated heritage assets is adjudged to be harmful. Paragraph 197 of the NPPF (CDA 1) requires the significance of a non-designated heritage asset should be taken into account in determining the application.

6.10 The significance of the buildings lies in their age, form, and an uncommon typology of building as they originally provided stables, coach houses and tack/feed storerooms with ancillary residential rooms to the first floor as accommodation for the grooms and their families. The buildings are of two storeys and constructed of yellow stock brick with large black stained/painted timber coach house/stable doors at ground level and painted timber sliding sash windows at first floor. The surviving cobbled yard between the buildings represents the significance of their setting adding to their charm and place quality.

6.11 The proposed main residential block rises abruptly as a wall of development at the end of the Mews with three storeys and a fourth storey in the roof looming above, severing any opportunity of reconnecting with potential development to the north. The block is visually dominant against the BTMs and harms their setting in terms of massing, scale, orientation and context. The BTMs (stable block) have an intimacy of scale which is not a feature of the four-storey residential building (see fig. 7) (CDF 7), which in terms of its spatial footprint and massing assumes an unwarranted visual dominance in this part of the site and overall results in a cramped and contrived form of development which appears as an over intensification of the application site. It is the combination of scale, footprint, massing and juxtaposition that sets the proposed four storey block at odds with the character and appearance of the Mews block.



Fig 7: Perspective of proposed scheme

6.12 The proposed three storey smaller residential building physically abuts the easternmost BTM and rises a storey above it. It impinges unacceptably on this non-designated heritage asset as it is proposed to build against the rear elevation, again causing harm. It is inappropriate for the proposed residential building to be conjoined with the rear elevation of the Victorian building and being in entirely different uses, residential and commercial. It is not apparent from the application exactly what kind of commercial use will be undertaken in the building.



Fig 8: Elevations of smaller three storey building

6.13 The three-storey residential building with the box-shaped roof storey perched on top sits awkwardly against the retained BTM (stable block) (elevations smaller three-storey building fig. 8 (CDF 10). The roof form does not sit comfortably against the pitched roof form of the BTMs (stable block). Moreover, it is not characteristic of the roofscape of the prevailing character of residential properties in East Twickenham.

6.14 A balanced judgement is required under S. 197 of the NPPF with regards to the scale of the harm. In this context it is the failure to incorporate these buildings as part of the wider urban design considerations of the site so that their place-making qualities can inform the form, character and design of the proposed development. The buildings are left isolated from the uses and physical form of the rest of the site. The scale of the proposed four storey residential building is visually dominant and overbearing and harmful to their setting, and the three-storey building is proposed to be built against the rear wall of the easternmost BTM causing physical harm as well as visual harm to the building's significance and setting.

6.15 I refer to the evidence provided by Fiona Dyson setting out the balance as required under S. 197 of the NPPF in terms of the harm caused to the non-designated heritage assets.

7.0 Statement of Disagreement

7.1 The Statement of Disagreement (CDF 15) sets out the areas of disagreement between the appellant and the London Borough of Richmond. In paragraph 2.3 it sets out the area of disagreement on Design. The three issues are set out below:

7.2 The effect of the development upon the character and appearance of the appeal site and the surrounding area, and including any implications for the significance of non-designated heritage assets:

- Whether the Layout, Height, Scale and Massing of the proposed development is contrary to the NPPF, NDG, and Policy LP1, Design Quality & East Twickenham Village Plan SPDs.

7.3 As a result of the layout through siting and footprint, and the height, scale and massing of the proposed development it is considered to represent an over development of the site and so contrary to these policies.

- Whether the proposed development reflects the character of the surroundings in terms of its scale and appearance and the compliance to the NPPF, NDG, LP 1 and LP 39 and Design Quality & East Twickenham Village Plan SPDs.

7.4 The design of the proposed development does not reflect the prevailing character of the surrounding area by virtue of its scale and appearance which gives rise to its visual dominance in the townscape and results in a contrived form of development. Its scale and visual dominance are a consequence of over development of the site.

- Whether the impact of the proposed development on the setting of Buildings of Townscape Merit is contrary to the NPPF, NPPG, NDG and policy LP4 and whether it would be harmful to the significance and setting of the non-designated heritage assets.

7.5 The proposed development, by reason of its siting, footprint, mass and of the severe horizontal emphasis of the eastern elevation of the proposed main residential building, combined with the height and siting of the proposed smaller residential building, would result in a cramped and contrived form of over development of the site, and would appear overbearing on the existing Buildings of Townscape Merit (BTM) on site. Therefore, the proposed development would be contrary to the policies in the NPPF, NDG and NPPG.

8.0 Summary and Conclusion

8.1 As I have set out in my Proof of Evidence, I focus on the reason for refusal covering the design of the proposed development. I have set out a description of the prevailing character and appearance of the surrounding residential area of East Twickenham as the context for the proposed development. In terms of assessing the design of the proposed development I evaluate this in terms of the National Planning Policy Framework (CDA 1) and the National Design Guide (CDA 3), along with the Adopted London Plan 2016 (CDB 2), the Intend to Publish Draft London Plan (CDD 1) and the Richmond Local Plan (CDB 1) adopted in 2018. My evidence also draws on the guidance set out in the Design Quality (CDC 2 and East Twickenham Village Plan (CDC 3) SPDs.

8.2 In my assessment of the proposed development I consider:

- Layout, Height, Scale and Massing of proposed development
- Townscape, Streetscape and Visual dominance

8.3 I also consider the relationship of the proposed development on the Buildings of Townscape Merit (BTMs). This is set out under:

- Impact on the setting of Buildings of Townscape Merit

8.4 In terms of the layout, form, height, scale and massing of the proposed development I compare and contrast these parameters in terms of the proposed development against the prevailing character and appearance of properties in East Twickenham and within the site context. I establish that the spatial footprint, layout, form and grain of the proposed development would contrast markedly with the prevailing character of the surrounding area as well as with the existing established Buildings of Townscape Merit, contrary to Local Plan Policy LP1, resulting in a cramped and contrived form of over development of the site.

8.5 I also consider the wider Townscape, streetscape and visual dominance of the proposed development. The proposed development fails to build on to the established grain, spatial footprint and townscape quality of the prevailing residential area and the BTMs (Stable blocks and Mews) contrary to the National Design Guide (CDA 3) paragraph 42 , London Plan (CDB 2) Policy 7.4 and is not compatible with the existing townscape provided by the Mews block contrary to Local Plan Policy LP1. It is the combination of the height, spatial form, and massing across the site, which produces a cramped and contrived over development of the site.

8.6 I consider the view from St. Margaret's Road Bridge referred to in the Case Officer's report and suggest that the proposed development would be visible from this location. The view (fig. 6 above) is of a well-treed landscape and in my opinion the proposed development would be visually dominant in the view.

8.7 The appeal proposal represents a backland infill site and its proposed layout, form, scale height and massing are inappropriate in context. The appellant acknowledges the value in retaining the existing BTMs (stable blocks), which are non-designated heritage assets, yet fails to integrate them as part of the wider development of the site.

8.8 I have concluded that the proposed development fails to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area in line with Policy LP 1. I suggest that the proposed development would have a visually dominant and overbearing impact on the residents' enjoyment of the rear gardens of nos. 2-12 Heathcote Road. Clearly the failure to incorporate the

public realm of the Mews by severing it from its historic context represents a failure to comply with the intent of this policy.

8.9 I have also concluded that the impact of the proposed three and four storey residential buildings would have an adverse and harmful impact on the established character and significance of the setting of the BTMs (stable blocks) insofar as they are not physically and functionally integrated into the site and they are visually dominated by the proposals in height, scale and massing to their detriment. Moreover, the awkward relationship of the 'box' roof form of the proposed smaller three storey building sits awkwardly and uncomfortably against the pitched roof of the BTMs (stable block). The proposed development is therefore symptomatic of a cramped and contrived over development of the site.

8.10 The test under paragraph 197 of the NPPF is that a balanced judgement is required as to the scale of the harm. As I have set out above that harm arises from the failure of the appellant to integrate them into the wider site by building upon their place-making qualities (London Plan Policy 7.4). As a consequence, the significance of their setting is harmed. The positioning and massing of the four-storey block on the existing alignment of Arlington Road severs the public realm connection, whilst its proximity at the end of the cobbled Mews is visually dominating in height, scale and massing. Moreover, the abutting of the three-storey residential development against the rear wall of the BTM (stable block) has a harmful impact on its architectural and historic integrity and authenticity resulting in a loss of its significance.