



22 November 2022  
(via email)

Dear Ms Thatcher

Planning Application 21/2758/FUL

The Twickenham Riverside Trust, in addition to its other objections and observations already submitted, would like to object to the above planning application due to its negative impact on Local Views.

The Council has recently (22 July 2022 - 5 September 2022) consulted on the Local Views SPD.

Two of the Local Views in the consultation relate to the proposed development site: C3.2 (Twickenham Riverside and Eel Pie Island) and C3.3 (Twickenham Riverside East). This objection will focus on Local View C3.2

To quote from the LBRuT Local Views SPD consultation material (TRT underlining):

1.1 | Richmond borough has important views that require protection through the planning process, in particular during the consideration of planning applications. [...] The borough has also specifically recognised views that are important to protect, including those in and around conservation areas, as well as of landmarks defining points of townscape interest.

1.2 [...] . This work was carried out alongside the Urban Design Study that was undertaken in 2021 as part of the evidence base to inform the development of the policies in the new Regulation 18 draft Local Plan. The Urban Design Study 2021 sets out the details of valued views in relation to each identified character area, including the range of prospects, linear views and townscape views, which are highly important, including in the borough's riverside and open space settings. [...]

1.3 The purpose of the draft Local Views SPD is to set out those existing protected views that have already been adopted through the Local Plan, as well as additional new locally important views.

1.5 The SPD supplements Policy LP 5 in the adopted Local Plan (2018). It is also designed to supplement the draft Policy 31 in the emerging new Local Plan. [...]

**The consultation material makes reference to the National Planning Policy Framework (2021) and quotes from Historic England guidance:**

2.1 [...] 'Views, however, can of course be valued for reasons other than their contribution to heritage significance. They may, for example, be related to the appreciation of the wider landscape,

where there may be little or no association with heritage assets. Landscape character and visual amenity are also related planning considerations. The assessment and management of views in the planning process may therefore be partly or wholly separate from any consideration of the significance of heritage assets. The setting of heritage assets in Richmond is fundamental to an appreciation of their character and appearance. Local views of heritage assets form part of their wider appreciation and cultural value that can be enjoyed by people.

**The London Plan (2021) is also referenced:**

2.1 [...] Policy HC3 Strategic and Local Views

This policy sets out to define the strategic context for identifying views across London that are seen from places that are publicly accessible and well used. It seeks to protect vista towards strategically important landmarks and protecting World Heritage Site's authenticity, integrity, and attributes of Outstanding Universal Value. The policy suggests that Boroughs should include all designated views, including the Page 6 of 94 Official protected vistas, in their Local Plans and work with relevant land owners to ensure there is inclusive public access to the viewing location, and that the view foreground, middle ground and background are effectively managed in accordance with the LVMF SPG.

**Similarly the Richmond Local Plan (2018):**

2.1 [...] Policy LP 5 (Views and Vistas); it is anticipated this will be superseded when a new Local Plan is adopted Policy LP 5 Views and Vistas

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, by the following means:

1. protect the quality of the views and vistas as identified on the Policies Map, and demonstrate such through computer-generated imagery (CGI) and visual impact assessments;
2. resist development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline;
3. require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced;
4. require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background;
5. seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured;
6. seek improvements to views within Conservation Areas, which:
  - a. are identified in Conservation Area Statements and Studies and Village Plans;
  - b. are within, into, and out of Conservation Areas;
  - c. are affected by development on sites within the setting of, or adjacent to, Conservation Areas and listed buildings.

**The Richmond Local Plan (Regulation 18: December 2021) is referenced extensively:**

2.1 [...]

Policy 31 (Views and vistas); at this early stage in plan preparation this is not relevant to decision-making, however the SPD is designed to supplement the emerging policy, and any additional local views will be proposed for designation as part of the next stage of the Local Plan (Regulation 19 stage).

Policy 31.Views and vistas Page 7 of 94 Official

A. The Council will protect the quality of the identified views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means:

1. protect the quality of the views and vistas as identified on the Policies Map, and for any proposal affecting a designated/identified view/vista on the Policies Map demonstrate this through the submission of such through computergenerated imagery (CGI) and visual impact assessments as required by Policy 44 Design process;
2. resist development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline;
3. require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced, and reflect the relevant character area design guidance in the Urban Design Study;
4. require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background;
5. seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured;
6. seek improvements to views within Conservation Areas, which:
  - a. are identified in Conservation Area Statements and Studies and Village Plans;
  - b. are within, into, and out of Conservation Areas;
  - c. are affected by development on sites within the setting of, or adjacent to, Conservation Areas and listed buildings.

Policy 44 (Design process) – This policy sets out a design-led approach to the evaluation of development sites in accordance with the London Plan. The onus is on developers to undertake a thorough analysis of sites and their context to understand fully the impact of any proposals on the settings of heritage assets. An analysis of both strategic and local views is essential to understand the impacts of development on views. Views extend beyond borough boundaries so it is incumbent on developers to prepare accurate visual representations (AVR) and use digital modelling such as VUCITY to understand the full implications of development proposals.

### **Section 3 (Richmond's Local Views) sets out good practice:**

3.3 [...] If a local view is not designated, a development proposal would still be assessed against relevant development plan policies – such as the setting of designated heritage assets, river corridor and landscape designations, and wider local character and design considerations.

3.4 The presence of a view will influence the design quality, configuration, height and site layout of new development or extensions to existing developments. [...]

3.5 Applicants for major development proposals should identify important local views at the pre-application stage so that these will feature in the Townscape and Visual Appraisal analysis. Further

into the pre-application process applicants are encouraged to prepare Accurate Visual Representations (AVRs) of important views to demonstrate whether the development proposals will impact upon them as part of an assessment for the Design Review Panel.

3.6 Applicants will be required to provide Accurate visual Representations (AVRs) of the impact on views of proposals from agreed viewpoints with planning applications for major developments. These will form part of the Townscape and Heritage Impact Analysis. The use of 3D modelling such as VUCITY is also advocated.

Paragraphs 3.5 and 3.6 are of special relevance to this planning application. This is with reference to:

**1. Accurate Visual Representations (AVRs)**

**2. 3D modelling such as VUCITY**

The Applicant (i.e the Council) has made the decision NOT to provide AVRs.

Page 2 of the 2nd section of the "Heritage, Townscape and Visual Impact Assessment" 6.3:

6.3 To support the visual assessment, 11 representative viewpoints were agreed with LBRuT. These all look towards the Site and are intended to illustrate the maximum visual conjunction between proposal development and its townscape context. Hopkins Architects have produced Computer Generated Images (CGI's) of the proposal from these viewpoints, which in each case are set against an 'existing' photograph for comparison. It was agreed with LBRuT that the CGI's did not need to be produced as Accurate Visual Representations (AVRs), which are verified for accuracy.

As a result, all images have had to be relabelled "Artistic Impressions".

No 3D modelling of the proposed development has been submitted as part of the planning process, except that submitted with the Daylight/Sunlight Report, which restricts itself to aerial views. There is no 'on the ground' modelling.

With respect to Local View C3.2 (Twickenham Riverside and Eel Pie Island):

Local Views SPD – 2022 (DRAFT)

Character Area Name:

**Twickenham Riverside**

View Name and Reference:

**Twickenham Riverside and Eel Pie Island**

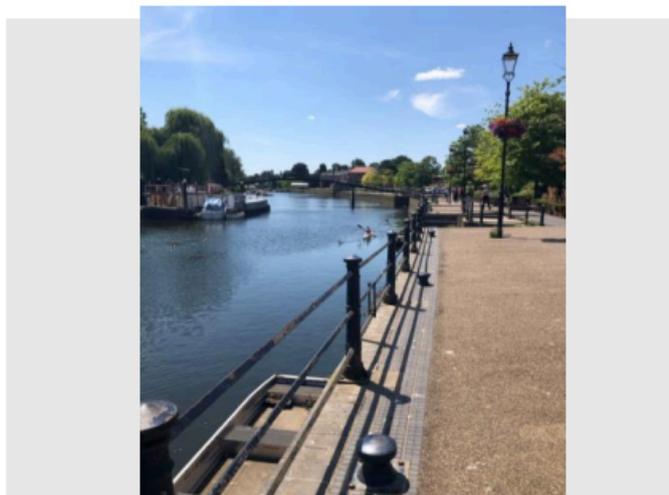
**(C3.2)**

View Type:

**Prospect**

**Description of View**

Sequential view from Twickenham riverside



**View:** C3.2

This view is described as follows:

**Description of View**

Sequential view from Twickenham riverside (south) - including Diamond Jubilee Gardens to Church Lane. Riverside predominately urban (industrial, townscape and/or residential) in character; encompassing:

- a) (south) townscape/ residential edge from Radnor Gardens. Long-view includes the distinctive black and white clock tower of St Catherine's Tower, Radnor House (St James School, Building of Townscape Merit); the tower stands out above the line of the surrounding buildings which are generally less than three-storesy;
- b) (central) commercial and leisure activity and people activity walking along the embankment; views across to Eel Pie Island - boatyards and rowing club activity; and,
- c) (town centre background) cluster of historic buildings including St Mary's Church and 18th century waterfront houses and pubs.

Some of the “artistic impressions” (as opposed to AVRs) submitted in support of this planning application:

Heritage, Townscape and Impact Assessment Part II page 5 (page 29):



Existing



Proposed

listed building's setting through the introduction of a

Heritage, Townscape and Impact Assessment Part II page 8 (page 32):



Existing



Proposed

Heritage, Townscape and Impact Assessment Part III page 5 (page 37):



Existing



Proposed

Heritage, Townscape and Impact Assessment Part III page 6 (page 39)



Existing



Proposed

view, the Water Lane building would be visible in

Based on an assessment of the above images, the Twickenham Riverside Trust would like to object to the planning application due to its negative impact on local views based on the height and proximity to the riverside of the proposed 21-m high from Embankment level Wharf Lane Building.

With my best wishes

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*Chair, Twickenham Riverside Trust*