

**Massing improvements – Gould Road & Crane Road (DRP comment)**

- Concerns over the massing at the junction of Gould Road and Crane Road in relation to existing terraces and overlooking from the roof gardens in Building F;
- Review the lantern roof and look at the option of a flat roof instead; not convinced of the darker tone.

**Massing improvements – Gould Road & Crane Road (pre-application comment)**

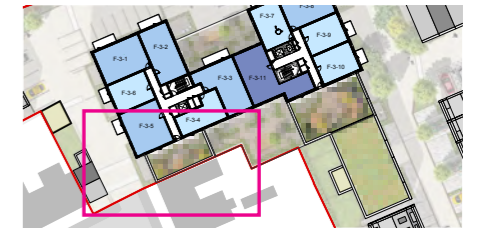
- The roof of Building F appears over-heavy and appears to emphasise the upper-storey finish.



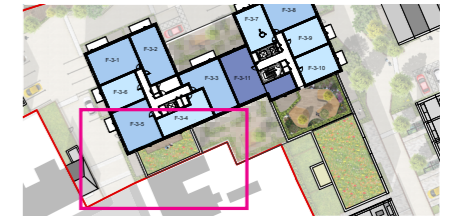
**Massing improvements – Gould Road & Crane Road**

We have tested a variety of approaches in response to these comments. The flat roof option was tested but this gave a very blocky form that is largely alien to the area and did not compliment the existing roofscape. The design team instead propose the following amendments to address the comments from the DRP and pre-application meeting as follows:

- Reduce parapet and roof terrace extent at junction of Gould Road and Crane Road improving the relationship with the existing terrace of houses and reducing potential overlooking from the roof terrace;
- Amend treatment of fourth floor and roof profile to reduce visual impact from the street;
- Change material to reduce 'heavy' appearance;
- Retain lantern profile and roof pitch within a gable to best respond to existing buildings on site and local character.



Planning submitted scheme showing roof terrace



Potential scheme showing residential terrace area



Planning submitted scheme: looking north down Crane Road



Revised scheme



Planning submitted scheme: looking north down Crane Road



Revised scheme

**Overlooking & privacy**

Fourth Storey and balconies to the western end of Building F could have a negative impact and potential overlooking.

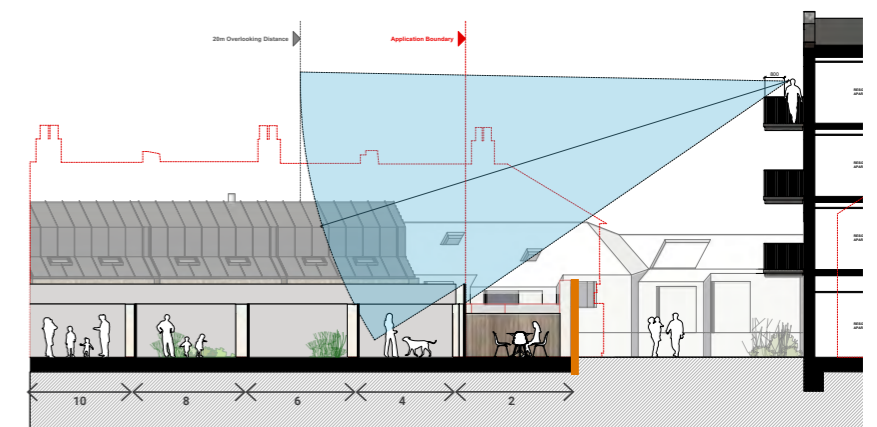


**Overlooking & privacy**

A full review of overlooking was undertaken on these properties. The current proposal does not overlook existing windows, but does overlook their gardens. Overlooking of gardens is a common condition within the area and not considered unacceptable, whilst it is important new apartments are provided with balconies to meet New London Plan Guidance.

However the following changes are proposed to reduce this perceived overlooking to benefit the existing owners of the gardens.

- Overlooking to neighbouring gardens minimised by garden of number 2 Gould Road and proposal to increase height of existing perimeter wall at site application boundary;
- Balcony railings amended to blades directing views towards the river providing residents with additional privacy and reducing overlooking from those sitting on the balcony or within the rooms.



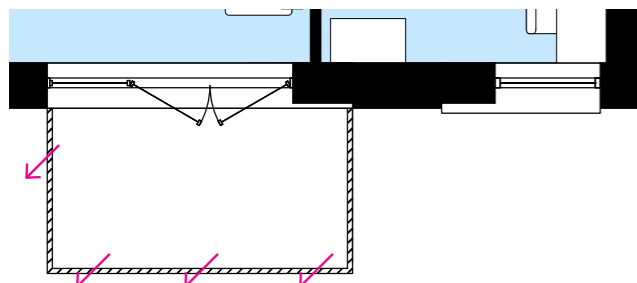
Section showing visibility splay from balconies

### Summary of elevation and massing amendments to Building F following DRP & pre-application

1. Change of top floor and roofscape – reduced angle and change of material;
2. Balcony design amended;
3. Massing reduced by lowering the top floor parapet and the communal roof terrace omitted.



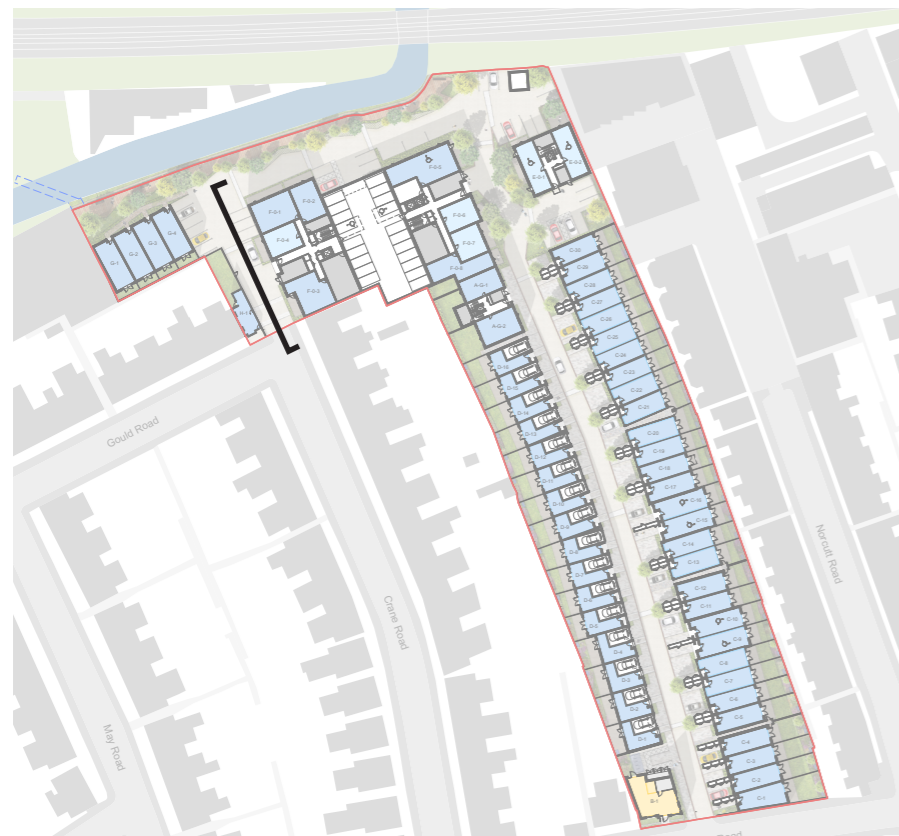
Elevation of amended balcony



Plan view of amended balcony with directional arrows



Planning submitted elevation



Key



Amended elevation

2.4 Environmental agency & Friends of the River Crane comments

A letter was submitted by the Environmental Agency objecting to the proposal in April 2019. In the letter the EA object to the proposed development, due to its impacts on nature conservation and Water Framework Directive Requirements.

On 24th June a letter was submitted by the applicant responding to the letter and providing additional information to the Environmental Agency. Since receipt of this letter the EA have withdrawn their objection to the scheme. A summary of the comments and how we responded is on the following pages.

In addition to the EA letter, a letter from Friends of the River Crane (FORCE) was submitted objecting to the proposals. These comments are also summarised below.

Comments

**Riparian habitat (EA comment)**  
Loss of riparian semi-natural habitat within 8m of the River Crane.

**Riparian habitat (FORCE comment)**  
FORCE supports the concept of the riverside walkway in principle. The walkway should be clearly signed from adjacent streets as a public pathway, and it must remain fully and freely accessible to the general public at all times in order to register as a benefit to the wider community.  
Any proposal of this nature should also be entirely compatible with the developments proposed in the Lower River Crane Restoration Vision, and must in no circumstances be allowed to frustrate the Restoration Vision.




Our response

**Riparian habitat**  
Richard Graves Associates who have been appointed for ecology and biodiversity, have confirmed that there is negligible riparian semi-natural habitat affected by the proposals. The river stretch fronting the site is channelised with vertical piled sheet metal or concrete sides with limited terrestrial ruderal vegetation overhanging the wall such as bramble and buddleia. As such, the adjacent riparian habitat offers negligible potential water vole Arvicola amphibious burrowing habitat or kingfisher Alcedo atthis / sand martin nesting habitat.

However, it is acknowledged that these species are known to frequent other sections of the river and are likely to utilise the river adjacent to the site as commuting or / and foraging habitat. It is also acknowledged that the river corridor adjacent to the site is currently likely to provide a dark corridor with restricted human disturbance, although up until recently, the site would have been subject to levels of noise disturbance and light trespass as a result of the existing Bakery operation.

Therefore we have proposed to increase the riparian habitat by providing additional greenery along the river edge, and opportunities for burrows and nesting within a low level wall and native hedgerow.



Existing riverbank condition


**Impact on nature conservation and Water Framework Directive Requirements (EA comment)**  
‘The Thames River Basin Management Plan (RBMP) states that the water environment should be protected and enhanced to prevent deterioration and promote the recovery of water bodies. Based on the information submitted with this application, there is a significant risk that the development may prevent achievement of good ecological status. Natural river corridors can provide a filtering effect on runoff to ‘clean’ runoff before it enters the watercourse. By not providing a natural corridor to the River Crane, there is an increased risk of roadside runoff into the watercourse, causing a deterioration to water quality...’

**Impact on nature conservation and Water Framework Directive Requirements (FORCE comments)**  
FORCE would expect the developer to provide permeable surfaces wherever feasible throughout the site, in particular in proposed car-parking locations. We also expect the developer to provide for rain water recycling in its residential and commercial units.




**Impact on nature conservation and Water Framework Directive Requirements**  
It is acknowledged that hard surfaces adjacent to river corridors have the potential to cause a deterioration of water quality, however the proposed drainage strategy mitigates the risk and provides an improvement over the existing situation in line with the CIRCA SuDS Manual. Further to this we now propose reducing the hard standing and parking provision adjacent to the river and further increasing ecology and soft landscaping ensuring the existing condition is greatly improved.

The revised landscape plan to the right shows these improvements. The use of permeable paving materials is proposed where ever possible maximising SUDs measures where ever possible,



Planning submitted landscape plan



Revised planning landscape plan



Planning submitted landscape proposal



Proposed revision

**Lighting encroaching on the river corridor and channel (EA comment)**

The plans proposed as part of this scheme make note of a sensitive lighting plan that is suitable for light sensitive species such as bats that are known in the area. We support the plan to use such lighting schemes however we feel that the lighting is still encroaching on the river corridor and channel. Light spill could be better prevented through the use of a natural corridor as a screen for the river.

**Lighting encroaching on the river corridor and channel (FORCE comment)**

We are concerned that the proposed development – in particular the 5-storey blocks facing the river – will increase light spillage into the corridor. Large accommodation blocks adjacent to the river will inevitably lead to extensive light pollution along what is currently a dark corridor used extensively by bats. The development proposed has a detrimental impact on the environmental value of the river corridor in terms of lighting, noise, shading and littering for example.



**Lighting encroaching on the river corridor and channel**

An Exterior Lighting Assessment Supplementary Report has been prepared by Desco, in consultation with the Project Ecologists.

This sets out that illuminance from the proposed development do not significantly impact the river 'Dark Corridor' and improve upon the existing conditions, where factory windows are directly on the river edge and factory noise would also have been present.

The proposals have been further enhanced by the introduction of a low level wall, railings, tree planting and hedgerow to the river edge, which will further protect the river corridor from light encroachment.



Lux level analysis from lighting report

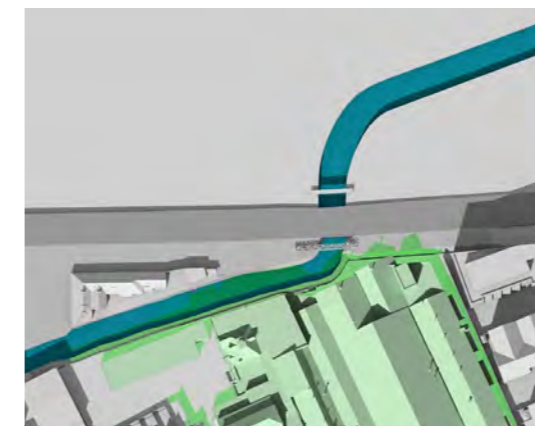
**Overshadowing of the river corridor (FORCE comment)**

Overshadowing of the river corridor – particularly given the development is directly to the south of the river and will cast a significant physical shadow into the corridor, reducing its environmental potential.

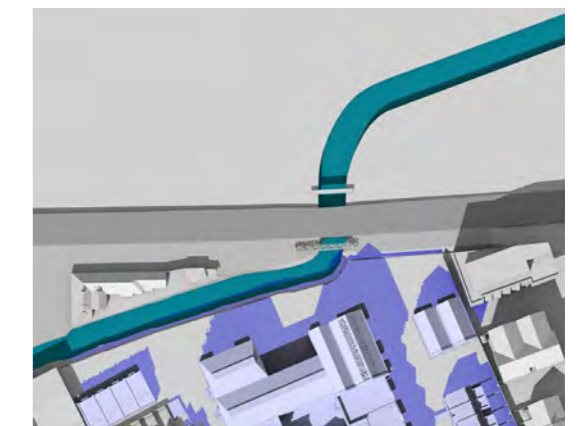


**Overshadowing of the river corridor**

An analysis has been undertaken on the levels of overshadowing comparing the existing condition and our proposed which demonstrates that there will be less overshadowing of the river with the new proposal. This is due to the buildings being significantly set back from the river edge when compared to the existing factory buildings, whilst large areas adjacent to the river go completely undeveloped.



Existing 01:00pm



Proposed 01:00pm

**Insufficient playspace (FORCE comment)**

FORCE notes that the play space and community space proposed for this development is very small in relation to the amount of housing that is being proposed for the site.

FORCE rejects the assertion – convenient for the developer – that;

"there is sufficient play space for 5+ year olds in the surrounding area. It is therefore proposed that play space for 5-12+ year olds will be accommodated within the Parks and Greens listed below" (DAS, p98).

FORCE seeks greater provision of community space on the site, even at the expense of a reduction in the number of housing units built, in order to ensure that the site is more self-sufficient in terms of its impact on adjacent open spaces.



**Insufficient playspace**

Using the latest GLA occupant yield and play space calculator the predicted child yield for the site is 52 children (based on the addendum area schedule). The proposal is for ages 11 and above to be accommodated off-site in larger play areas more suitable. A contribution via Section 106 will be made by the developer to facilitate this. Removing the 11+ children, results in a play space requirement of 400sq m.

All houses of 3-bed or more are provided with a garden reducing the policy requirement for 0-4 playspace to circa 100 sq m under Richmond SPD guidance.

Despite this the amended proposals have increased the public realm playspace area giving a total of 368sqm and a further 165sqm within communal terraces. This ensures the current proposal is policy compliant..





## 2.5 Summary of amendments following consultation

The proposal remains largely similar to the original submission. It still proposes 116 residential units in the same mix of houses and apartments with a similar massing.

However, the changes proposed as a result of consultations have greatly improved the public realm and have responded to the comments raised. The final changes are summarised below:

### Key

- Reduction in parking, improvements to riverside area and enhanced play
- Safe guarding of future bridge
- Changes to the massing at the junction of Gould Road and Crane Road and removal of communal roof terrace
- Amendment to Building F fourth floor roof form and treatment
- Amendment to balcony design on Building F
- Adjusted house types and increased back gardens where possible, relocating two accessible houses into the apartments
- Change to rear of houses to improve DLSL and outlook without introducing overlooking
- Relocate substation to standalone building and replace with NSA



Roof plan of planning submitted scheme highlighting changes





**Introduction**

**Post-submission consultation**

**3.0 Design response**

**Appendices**