

PA19/0646/FUL: GREGG'S BAKERY

03 August 2020 14:30

Subject	PA19/0646/FUL: GREGG'S BAKERY
From	Gary Backler
To	Faherty, Thomas
Cc	DC Technical Support Hub; Rob Gray
Sent	03 August 2020 14:22

Dear Mr Faherty,

PLANNING APPLICATION 19/0646/FUL: GREGG'S BAKERY AND 2 GOULD ROAD

I email on behalf of Friends of the River Crane Environment (FORCE) in relation to the above application. We objected to this application in April 2019, and objected to the revised proposal in December 2019.

I understand that this application is due before LBRuT's Planning Committee on Wednesday 5 August 2020, and that officers have recommended that the Committee refuses the application. While FORCE is satisfied with this recommendation, we continue to have a number of concerns that the refusal highlights.

First, as far as I can establish, FORCE has received no notification that this application will be considered at the Planning Committee on 5 August. This is disappointing given our obviously very active concern in proposals for developing the Gregg's site. We would like to request an invitation to the Committee and an opportunity to speak. We would also welcome reassurance that we will be notified and invited to future Committee meetings at which this site is on the Committee's agenda.

Second, we note that the principal reason for refusing the application is an in-principle objection to the loss of industrial/employment space in LBRuT. FORCE is concerned that this objection could relatively easily be overturned in the future by a change in policy vis-à-vis industrial/employment and residential space. We believe that there are a number of other, equally valid reasons why the proposed development is inappropriate and should be refused even if industrial/employment and residential policy change in future.

In particular, we note that Section 4 of the decision recommendation makes no reference to LP5 Views and Vistas (fully accepting that the list of relevant policies is explicitly "not exhaustive"), and that LP2 Building Heights is deemed to have been complied with because the 5-storey height of the proposal on the former Gregg's site is consistent with the height of the adjacent proposed Norcutt House.

FORCE is very concerned that proposals to build 5-storey developments on the banks of the River Crane will compromise the visual amenity of the river for residents and visitors, and relegate it to the status of a visually and ecologically sterile urban channel. Our objection is to the massing of the 5/4-storey part of the development at the point on the former Gregg's site that is closest to the river. This will clearly compromise the view towards the river from Craneford Fields.

We believe that undeveloped vistas are an important contributor to the mental health and tranquillity benefits of the river for residents and visitors. Our recent surveys of usage of adjacent open spaces evidence that up to 2,000 visitors may be availing themselves of this vista on a daily basis. Particularly post-Covid, with a likely increase in working from home and localisation of leisure, we believe that visitor interests should be protected. We also believe that views and vistas are a public good, freely accessible to all: a 5/4-storey development on the river will destroy this public good for the private benefit of the developer and residents who purchase properties within the development.

In relation to Norcutt House, FORCE has no record of having been informed of the proposed development or invited to comment on the proposed development. We remain opposed to this 5-storey development on the banks of the River Crane. We would prefer the building height to be lowered and stepped back further from the river, and we would prefer public access along the river to be opened up.

Finally, we are concerned that the proposed contributions to off-site playspace are far lower than the revenue that the developer would forego by making adequate on-site provision. Thus, the contributions are unduly advantageous to the developer. The amounts themselves are relatively small when spread over the children and parents who will attend these facilities over a number of years. Moreover, the contribution of £27,500 to public open space equates to a one-off payment of less than £70 per resident in the potential population of around 400 in the new development, who may be expected to make use of the open spaces for many years. We remain concerned that following upon the construction of 180 residential units with minimal recreational facilities in the redevelopment of the Richmond Education and Enterprise Campus, the increased burden on existing open spaces may have irreversible consequences for their future ecological and amenity value.

FORCE looks forward to these issues being addressed in any future development proposals that may be brought forward for this very important riverside site.

Regards,

Gary Backler,
Trustee, Friends of the River Crane Environment

Website: <http://www.force.org.uk/>

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