



Greggs Bakery / Twickenham

Planning Statement

(Including Employment Policy Assessment and Draft Heads of Terms)

February 2019



**Planning Statement (Including Employment Policy Assessment and
Draft Heads of Terms)**

Greggs Bakery, Gould Road, Twickenham, TW2

London Square Developments Limited

February 2019

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ
Tel: 020 7004 1700
Fax: 020 7004 1790

CONTENTS

1.	INTRODUCTION	3
2.	SITE CONTEXT	6
3.	PLANNING HISTORY	10
4.	PRE-APPLICATION DISCUSSIONS & CONSULTATION.....	11
5.	APPLICATION PROPOSALS	14
6.	PLANNING POLICY FRAMEWORK AND OVERVIEW	18
7.	PLANNING POLICY ASSESSMENT.....	20
8.	PLANNING OBLIGATIONS & SECTION 106 HEADS OF TERMS.....	68
9.	CONCLUSIONS.....	70

Appendix 1 – Planning History

Appendix 2 – Images of existing Site constraints

Appendix 2 - Newspaper articles

1. INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Limited on behalf of London Square Developments Limited (the “Applicant”) in support of an application for the redevelopment of Greggs Bakery, Gould Road, Twickenham TW2 6RT (the “Site”), within the London Borough of Richmond upon Thames (“LBRuT”). Greggs PLC (hereafter ‘Greggs’) own the freehold to the Site.

1.2 The Proposed Development is as follows:

“Demolition of existing buildings (with the retention of a single dwelling) and redevelopment of the site to provide up to 116 residential units and 175 sqm affordable B1 office floorspace; landscaped areas; with associated parking and highways works and other works associated with the development.”

1.3 This Planning Statement is structured as follows:

- Section 2 – Site Context
- Section 3 – Planning History
- Section 4 – Pre-application Discussions and Public Consultation
- Section 5 – Application Proposals
- Section 6 – Planning Policy Framework
- Section 7- Planning Assessment
- Section 8 – S106 Draft Heads of Terms
- Section 9 - Conclusions

1.4 In addition to this Planning Statement, the application is submitted with the following supporting documents:

-
- Application Form (Including Ownership certificates and notices);
 - Location Plan (1:1250 or 1:2500) (Prepared by Assael Architects);
 - Site Plan (1:200 or 1:500) (Prepared by Assael Architects);
 - Design and Access Statement (including Landscape Scheme) (Prepared by Assael Architects);
 - Existing and Proposed floor plans, elevations, site sections and Roof Plans (Prepared by Assael Architects);
 - Transport Assessment (Prepared by WSP);
 - Travel Plan Statement (Prepared by WSP);
 - Construction Management Plan (Prepared by London Square);
 - Flood Risk Assessment (including SuDs Statement and Foul Sewage Assessment) (Prepared by Watermans);
 - Energy Strategy Report (Prepared by Desco);
 - Utilities Statement (Prepared by Desco);
 - Lighting Strategy (Prepared by Desco);
 - Sustainable Construction Checklist (Prepared by Desco);
 - BREEAM Pre-assessment (Prepared by Hilsdon Holmes);
 - Statement of Community Involvement (Prepared by Cascade Communications);
 - Archaeological Statement (Prepared by CgMS);
 - Air Quality Assessment (Prepared by WSP);
 - Daylight Sunlight Report (Prepared by Point 2 Surveyors);
 - Phase I Environmental Assessment (Prepared by AP Geotechnics);
 - Phase II Environmental Assessment (Prepared by AP Geotechnics);
 - Acoustic Report (Paragon Acoustics);
 - CIL Additional Information Form (Prepared by DP9 Ltd);

-
- Townscape and Heritage Assessment (Prepared by Arc);
 - Health Impact Assessment (Prepared by Trium);
 - Financial Viability Assessment (Prepared by DS2);
 - Affordable Housing Statement (Prepared by DS2);
 - Ecology (Prepared by Richard Graves Associates);
 - Marketing Report (Prepared by Colliers International);
 - Demand Report (Prepared by Milestone Commercial Agency Ltd).

1.5 This Planning Statement should be read in conjunction with the above documents.

2. SITE CONTEXT

The Site

- 2.1. The existing Site comprises the former Greggs Bakery Site in Twickenham, within the London Borough of Richmond Upon Thames. The Site is L shaped and is bound by the River Crane to the north and railway line beyond, residential properties on Norcutt Road to the east, Edwin Road to the south, residential properties on Crane Road to the west and further residential properties on Crane Road/ Gould Road and at Crane Mews to the north west.
- 2.2. There are a range of buildings covering the majority of the Site which comprises an area of 1.1ha. The majority of the Site is covered by a single storey industrial shed alongside large extract equipment. There are also a number of associated two and three storey commercial buildings across the remainder of the Site which have developed in a piecemeal way over time. The existing buildings have reached the end of their life cycle.
- 2.3. Due to the current plot coverage, the total floorspace across the Site is 7,371 sqm GIA. The existing structures are built up to the boundaries with the gardens of the properties at Norcutt Road and Crane Road.
- 2.4. The Site is highly constrained and is accessed via Edwin Road to the South and via Gould Road at the north of the Site. There is a small yard to the south of the Site accessed from Edwin Road which is where HGVs access the Site. A limited amount of car parking associated with the existing bakery is located within the Site accessed off Gould Road to the north of the Site. Staff from Greggs Bakery were previously able to park on the surrounding streets prior to parking restrictions associated with to the introduction of the 'West Twickenham CPZ' which came into force in May 2018. The Site is within a residential area and has a PTAL level of 2/3 across the Site.

-
- 2.5. The entrance to the Site at Edwin Road is surrounded with a brick wall and unattractive metal safety railing. An acoustic wall is installed between the gardens of the properties on Norcutt Road and the Site. The entrance to the Site from Gould Road is also gated with a metal safety fence.
- 2.6. The existing use of the site is for Class B2 (general industrial) purposes and includes ancillary office floorspace associated with the bakery operations that previously operated from the Site. This has been confirmed in pre-application feedback provided by the LPA. The bakery operation is now redundant and Greggs ceased the bakery use on the Site in 2018, but maintain an operational presence within the buildings. Greggs have been unable to sell the facility despite a marketing exercise carried out for a 12-month period since February 2018.
- 2.7. Greggs that operated on the Site since the acquisition in 1994. Agents for Greggs have advised that throughout this period it has proven problematic from an operational and asset management perspective. The buildings gave rise to an unsustainable maintenance costs resulting in the business beginning a search for alternative premises in the late 1990s as the Site was considered unfit for purpose. The business has operated from the Site, unsatisfactorily and inefficiently, maintaining a difficult relationship with neighbouring residents. Alternative premises were identified in Enfield and the Bakery production and distribution has now relocated outside of the Borough to a purpose-built facility which is more operationally efficient than the Bakery premises at Gould Road.

Site designations

- 2.8. The adopted Local Plan (July 2018) Proposals Map is yet to be updated. The Site is subject to the following designations:

- Archaeological Priority Area;
- Key Office Area - West Twickenham Cluster;
- Locally important industrial Land and business park – West Twickenham Cluster (including Gregg's Bakery and surroundings), Twickenham.

2.9. The following extract is from the Local Plan Appendix 6 – Locally important industrial land and business parks showing the 'West Twickenham cluster (including Gregg's Bakery and surroundings), Twickenham'.

West Twickenham cluster (including Gregg's Bakery and surroundings), Twickenham



2.10. The Site is located within an Article 4 Direction area which removed Permitted Development Rights for the change of use from Office (B1(a) Class Use) to residential (C3 Class Use).

Surrounding area

- 2.11. The north of the Site is adjacent to the River Crane, however the entire Site falls within Flood Zone 1 and therefore has a low probability of flooding.
- 2.12. The River Crane and land beyond to the north of the Site is designated as Metropolitan Open Land (MOL).
- 2.13. The Site is not listed, locally listed or located within a conservation area. The Hamilton Road Conservation Area is located to the east of the Site with the boundary running between the back gardens of the properties on the east side of Norcutt Road.
- 2.14. The surrounding area is predominantly residential in character comprising rows of terraced streets. Crane Mews to the west comprises a mixed-use building of small commercial units and residential. To the south of the Site there is a small workshop in light industrial use. Lockcorp House on Norcutt Road to the east of the Site comprises an office building which has been the subject of various applications which have resulted in planning permission being granted for residential use and most recently received approval for student accommodation. Norcutt Road comprises mews type properties with small rear gardens which adjoin the Site.
- 2.15. Craneford Way Depot to the north of the Site beyond the River Crane and railway line comprises a large underdeveloped waste Site.

3. PLANNING HISTORY

- 3.1. Historic Ordnance Surveys from 1938 demonstrate that the Site was historically Allotted Gardens located between Norcutt Road to the east and Crane Road to the west. The allotments adjoined the residential gardens of the properties on these roads.
- 3.2. The planning history indicates that the first use of the Site as a bakery began in approximately 1951. The development of the Site has occurred in a piecemeal way over the years as demonstrated below and the buildings now cover the majority of the Site.
- 3.3. The Site was formerly operated by Coombe Bakery Ltd and was occupied by Greggs Bakery in 1994. The Site has an extensive planning history and has been the subject of various applications for historic extensions. The relevant planning history is set out below.
- 3.4. An application (ref. 08/3145/FUL) for "*Erection Of A Betta Absorptive Noise Barrier To The Rear Of 20-22 Crane Road, Twickenham.*" was approved on 14th November 2008.
- 3.5. An application (ref. 85/1756) for "*The erection of noise baffle sidewall sheeting and roof to covered van closing area together with screen.*" was approved on 13th February 1986.

4. PRE-APPLICATION DISCUSSIONS & CONSULTATION

- 4.1. The National Planning Policy Framework (2019, MHCLG) emphasises that early engagement and good quality pre-application discussion enables better coordination between public and private resources.
- 4.2. In light of policy guidance on pre-application discussions, the Applicant has sought to engage and discuss the proposals with LBRuT planning, design and transport officers, local residents and other key stakeholders.
- 4.3. The accompanying Statement of Community Involvement (SCI) sets out the details of all consultation that has taken place and the responses received. A summary is provided below.

Pre-application consultation with LB Richmond

- 4.4. An initial pre-application meeting was held with the London Borough of Richmond on 12th September 2017. The proposals at that time comprised 118 new dwellings on the Site. A written pre-application response was received in January 2018. A summary of the key issues discussed are set out below:
 - Principle of redevelopment and land use;
 - Design, massing and layout;
 - Sustainability and renewable energy targets;
 - Parking and transport considerations;
 - Impact on existing residential amenity.
- 4.5. A further pre-application meeting was held with the London Borough of Richmond on 10th January 2018. The proposals sought to respond to previous pre-application advice. To date no written response has been received.

Public Consultation

- 4.6. An initial 'Door knocking' exercise was carried out to canvas opinion on the pre-application proposals with the immediate neighbours surrounding the Site in October 2018. The findings of the initial consultation were positive and there was a preference for residential development on the Site. A full break down of the responses are included within the Statement of Community Involvement.
- 4.7. A Public Consultation Event was held on Monday 3rd December and Wednesday 5th December 2018 at two venues in close proximity to the Site. The exhibition was well attended and the feedback was positive. The key themes of the feedback were:
- Preference for residential development;
 - Importance of neighbouring amenity
 - Concerns regarding HGV traffic with Greggs Bakery
 - Adequate provision of parking
 - Design in keeping with local area (in terms of scale and density)
 - Importance of improving capacity of local public services.

Stakeholder Consultation

- 4.8. A meeting was held with Local Councillors in January 2019 to discuss the proposals. Full details of the meeting are included within the Statement of Community Involvement. A summary of the discussion points are set out below:

Land use

- Provision of small commercial element

-
- Acknowledgement of the neighbouring development at Crane Mews which has undergone conversion from commercial to residential
 - Affordable housing provision
 - Provision of family sized units
 - Partnership with housing associations
 - Mix of tenure and house types for affordable homes

Roads/access/traffic

- Design
- Interest in improving local roads
- Through-route to the station for pedestrian/cyclists

Bridge/river access

- Integration with wetland/green space around the river
- Potential for bridge access across river

Parking

- Electric charging points in homes
- Parking permits
- Car share space
- Cycle parking provision

Green Energy

- Sustainability measures
- Solar panels on roof

5. APPLICATION PROPOSALS

Description of Development

- 5.1. This application is for full planning permission and comprises the redevelopment of the Site to provide 116 residential dwellings and 175 sqm (GIA) of flexible, affordable commercial office (B1 Class use) floorspace.
- 5.2. The proposals involve the demolition of the existing industrial buildings across the Site with the retention of an existing two storey end of terrace dwelling house on Edwin Road which is within the same ownership.
- 5.3. The description of development is:

“Demolition of existing buildings (with the retention of a single dwelling) and redevelopment of the site to provide up to 116 residential units and 175 sqm affordable B1 office floorspace; landscaped areas; with associated parking and highways works and other works associated with the development.”
- 5.4. The architecture of the scheme has been developed by defining three distinct parts of the Site, being the entrance buildings on Edwin Road, the Mews Street and the Riverside elements. The proposals should be read alongside the Design and Access Statement which sets out the detailed design of the proposed development.
- 5.5. A new street comprising new mews houses will be created through the Site parallel to the existing terraced streets. The proposals comprise the four apartment buildings to the north of the Site fronting the River Crane. The commercial element of the scheme will be delivered in a two-storey office building fronting Edwin Road.

- 5.6. The proposals comprise buildings stepping from 2 storeys to 5 storeys across the Site. The terraced mews properties will be two storeys with a dormer window to provide accommodation at second floor. To the north of the Site, the buildings step up to 3 and 4 storeys with the tallest apartment building stepping up to 5 storeys in the widest part of the Site.

Commercial

- 5.7. It is proposed to provide 175 sqm GIA of affordable B1 Class office floorspace. The floorspace has been designed to be subdivided or open plan in order to create flexible accommodation. The proposed workspace will meet BREEAM Excellent rating.
- 5.8. The office floorspace will be provided at rents set at levels equivalent to 50% of open market rates. The workspace will be secured in this use through the S106 legal agreement and would be available only for local small and start up organisations.

Residential Dwelling mix

- 5.9. The proposals comprise the following unit mix which maximises the family dwellings across the Site:

	1B	2B	3B	4B
Apartments	32	30	3	-
Townhouses	-	5	35	11
Total	32	35	38	11
%	28%	30%	33%	9%
	-	-	42%	

Affordable Housing

- 5.10. A total of 37% of the residential units proposed will be provided as affordable housing. In terms of tenure these will comprise a mix of shared ownership and affordable rented units, of which 14 will be family sized units.

Amenity Space

- 5.11. Each of the apartments will benefit from private amenity space in the form of a private balcony or terrace. Additional communal roof terraces are provided at building F located on the Riverside. The mews houses will each benefit from a private rear garden.

Landscaping and Access to the River Crane

- 5.12. The proposals include removal of the existing wall between the River Crane and the Site to allow public access to the River frontage. This will be landscaped and an area designated for playspace provision.

Parking

- 5.13. Each new house will have an allocated car parking space in the form of an integrated garage or hard standing to the front of the property. A residential car park is proposed beneath block F providing further car parking spaces.
- 5.14. In addition, a single accessible car parking space is proposed associated with the commercial unit.
- 5.15. Therefore, a total of 116 car parking spaces will be provided across the Site of which 12 will be accessible. New residents will not be able to apply for a car

parking permit to park within the surrounding CPZ and this will be secured under the S106 Agreement.

- 5.16. In addition, a car club space is proposed on Edwin Road which will be accessible to both the new residents and to existing residents in the surrounding area. The car club parking space will be located on the existing vehicle crossover and will therefore not impact on the existing parking capacity of the surrounding area. This will be secured by S106 Legal Agreement.
- 5.17. A total of 224 long stay cycle parking spaces are proposed as part of the Development which will be accommodated within the boundary of each property either within the garages or designated cycle lockers for mews houses or cycle stores within the apartment buildings. Sheffield stands are proposed within the public realm to provide 4 short stay residential cycle spaces.
- 5.18. A cycle store will be provided within a secure and sheltered store adjoining the office building adjacent to the entrance.

6. PLANNING POLICY FRAMEWORK AND OVERVIEW

- 6.1. This Section sets out the main national, regional and local planning policy and guidance relevant to the determination of the application for the Proposed Development. An assessment of the Proposal in the context of relevant policies and guidance is provided at section 6 below.
- 6.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 6.3. The Development Plan for the Borough comprises:
- The London Plan (March 2016);
 - The London Borough of Richmond upon Thames Local Plan (adopted July 2018).
- 6.4. In addition to the Development Plan, the following planning policy and guidance documents are material considerations in the determination of the application:

National Planning Policy and Guidance

- National Planning Policy Framework (NPPF) (adopted February 2019)
- National Planning Policy Guidance (NPPG)

Regional Planning Guidance

- Mayor's Housing SPG (March 2016)
- Mayor's Sustainable Design and Construction (April 2014)
- The Mayor of London's Land for Industry and Transport SPG (2012)

6.5. The relevant local planning guidance documents which have been taken into consideration as part of the proposals is set out below.

- LBRuT Affordable Housing Supplementary Planning Document (SPD) (March 2014);
- LBRuT Car Club Strategy (December 2006);
- LBRuT Design Quality SPD (February 2006);
- LBRuT Development Control for Noise Generating and Noise Sensitive Development (September 2018);
- LBRuT Front Garden and Other Off-Street Parking Standards (September 2006);
- LBRuT Refuse and Recycling Standards (April 2015)
- LBRuT Residential Development Standards (March 2010)
- Housing Optional Technical Standards and inclusive access (June 2015)
- LBRuT Sustainable Construction Checklist (January 2016)
- Twickenham Village Planning Guidance (January 2018)

6.6. Emerging Planning Policy and Guidance:

- The Draft London Plan (August 2018) is currently going through the Examination in Public Hearing sessions (January 2019) and is therefore a material consideration in the determination of applications. Given the advance stage of the draft London Plan, significant weight should be attributed to this document.

7. PLANNING POLICY ASSESSMENT

- 7.1. This section assesses the Proposed Development against the Planning Policy and other material considerations.
- 7.2. An assessment of the following elements is included in this section:
- Principle of redevelopment;
 - Employment policy assessment;
 - Principle of the proposed flexible commercial floorspace;
 - Principle of the proposed residential accommodation;
 - Assessment of the proposed design.

Principle of redevelopment

- 7.3. The Site comprises previously developed land within an area characterised by residential properties in Twickenham. The existing buildings have come to the end of their life cycle and are generally no longer fit for purpose. A number of the buildings are known to comprise asbestos. As identified through the planning history at Appendix 1 for the Site, the buildings have developed in a piecemeal way over time in line with the needs of the bakery operation and cover the majority of the Site.
- 7.4. Greggs previously operated a Bakery (B2 Class Use) from the Site which became problematic due to the highways and amenity impacts associated with the Site's location within a residential area. Gregg's vacated the Site in 2018 and the main bakery operation has now ceased. Greggs maintain an operational presence on the Site. They have since relocated to a purpose built facility which meets modern standards elsewhere in London.
- 7.5. The Site presents an important opportunity to redevelop a redundant brownfield Site to deliver a significant number of new homes within the

existing residential area. As identified further below, there is a clear need for housing with the London Borough of Richmond upon Thames and within the wider regional context.

- 7.6. Paragraph 118 of the NPPF (July 2018) sets out that planning policies and decisions should *“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.”* The proposals accord with these objectives whilst enhancing the character and appearance of the Site and surrounding area.
- 7.7. Policy 3.3 of the London Plan identifies the potential to realise brownfield housing capacity including for mixed use redevelopment, especially of surplus commercial capacity.
- 7.8. The Strategic Objectives identified within the Local Plan set out that in order to build a sustainable future for the borough, proposals should *“Optimise the use of land and resources by ensuring new development takes place on previously developed land, reusing existing buildings and encouraging remediation and reuse of contaminated land.”*
- 7.9. The importance of utilising brownfield Sites is maintained in the Draft London Plan and the supporting text of draft London Plan Policy GG4 identifies that *“Reusing large brownfield sites will remain crucial, although vacant plots are now scarce, and the scale and complexity of large former industrial sites makes delivery slow.”*
- 7.10. Planning policies at all levels encourage the effective use of previously developed land. The Proposed Development would accord with this objective and make a valuable contribution to the local area.

Employment Policy Assessment

- 7.11. The Site is underutilised by virtue of the current buildings which are dated, in poor condition and not suitable for modern business requirements. A marketing report has been prepared by Colliers which identifies the existing condition of the Site.
- 7.12. The Proposed Development will replace the existing buildings with a mixed-use development comprising flexible affordable workspace (Class B1) along with residential development. The proposed 175 sqm B1 office floorspace will create around 18 full time jobs which would serve a local need for small businesses. The proposals will provide high quality floorspace which is more appropriate within the residential environment. This is in line with the aspirations of Local Plan Policy LP41 which sets out that the Council will ensure that there is a range of office premises, particularly for small and medium sized business activities; and that new office accommodation should be suitable to meet future needs, especially to provide for the requirements of local businesses and small firms. The proposals are also in line with the aspirations of London Plan Policy 2.7 which sets out that proposals should meet local need including for small and medium sized (SMEs), start-ups and businesses requiring more affordable workspace including flexible, hybrid office/ industrial premises.

Local Plan Policy LP40 (Employment and local economy)

- 7.13. Local Plan Policy LP40 sets out that the Council will support a diverse and strong local economy in line with the following principles 1-4 identified below.

“1. Land in employment use should be retained in employment use for business, industrial or storage purposes.”

7.14. The supporting text of policy LP40 identifies that the policy is concerned with uses within the B Use Classes and other Sites which are Sui Generis with a significant employment generating floorspace.

7.15. The Site is in existing B2 Class employment use and will provide an element of employment floorspace in the form of flexible affordable B1 Class office floorspace which will serve a local need. It is not considered appropriate to retain the entire Site for employment use within the residential area due to the Site constraints discussed further below.

“2. Major new employment development should be directed towards Richmond and Twickenham Centre. Other employment floorspace of an appropriate scale may be located elsewhere.”

7.16. The proposed level of commercial floorspace is considered to be commensurate with the location of the Site, outside of a centre and, within an area primarily characterised by residential dwellings.

“3. The provision of small units, affordable units and flexible workspace such as co-working space is encouraged.”

7.17. As identified above, the proposals comprise the introduction of 175 sqm flexible, affordable office workspace which is directly in accordance with the aspirations of the Local Plan.

“4. In exceptional circumstances, mixed use development proposals which come forward for specific employment sites should retain, and where possible enhance, the level of existing employment floorspace. The inclusion of residential use within mixed use schemes will not be appropriate where it would

adversely impact on the continued operation of other established employment uses within that site or on neighbouring sites.”

- 7.18. It is considered that the particular constraints of the Site, including its location, and its existing layout constitute exceptional circumstances that justify the change of use of the Site from its existing Class B2 industrial use to that proposed in this planning application. The proposals will deliver 175 sqm flexible affordable workspace within Class B1 which is considered appropriate within the existing residential context, alongside the provision of 116 residential dwellings as part of a mixed-use scheme.
- 7.19. There are significant Site constraints associated with the Site within the residential area which make it inappropriate for continued commercial use. The Site constraints are well documented within the London Borough of Richmond Employment Sites and Premises Study (2017) which identifies that *“The site is bounded by residential uses. Crane Road is primarily residential road which means that operating hours, types of industrial activity and access are constrained. The current use experiences issues with HGV access”*. The Site is identified as having a poor compatibility with surrounding neighbours and is identified as having poor access via residential roads used for resident’s parking on both sides.
- 7.20. Furthermore, The LBRuT Employment Sites and Premises Study (2017) sets out that *“The departure of Greggs presents an opportunity to redevelop a large site. However, the layout and location of the site has a number of constraints including access, hours of operation and the types of industrial activity permitted limiting the amount of employment floorspace that could be delivered. Redevelopment of the site would realistically be through a mixed use scheme. The northern part of the site, fronting the River Crane, is the most suitable area for employment use.”*

-
- 7.21. As identified by LBRuT, the use of the Site by Greggs as a bakery generated a significant level of daily HGV movement on the local highway. The streets surrounding the Site are narrow residential streets and are often heavily parked on both sides. The presence of HGVs on the residential street resulted in severe highways impacts including damage to parked cars. There is also evidence of damage to footways and kerbs where HGVs have had to mount the pavement. This also presents a safety risk for other road users and pedestrians. Local complaints of noise and poor air quality as a result of the presence of HGVs accessing the Site are also reported. Greggs Bakery benefits from an unrestricted consent meaning deliveries and servicing to and from the Site took place throughout the day including early in the morning, and late in the evening.
- 7.22. The highways impacts are well documented within the local press, examples of which are included at Appendix 3. Eyewitness photos taken at a Site visit demonstrate the difficulty HGVs have in accessing the Site which are presented at Appendix 2. Further details of the highways impact of the existing use are set out within the Transport Assessment submitted in support of this application. Swept path analysis has been undertaken which demonstrated that HGV's cannot safely navigate the turn from Edwin Road right into Marsh Farm Road.
- 7.23. Furthermore, the use of the Site for industrial is entirely incompatible with the surrounding residential context and there have been significant amenity impacts associated with the industrial use of the Site including the noise amenity impact. As demonstrated in the planning history, there have been a number of attempts to ameliorate the noise amenity impacts of the bakery operation on the neighbours over the years. Specifically, an application (ref. 08/3145/FUL) was approved in November 2008 for the installation of a noise

barrier to the rear of 20-22 Crane Road. The officer report for this application identified that the benefits of the proposed barrier were not *“limited to the activities around the waste storage but beyond this area where there is a high degree of noise and disruption from vehicular movements from Greggs and other delivery vehicles, noise and chatter amongst workers and rivers and other such activities within the site.”*

7.24. A prior application (ref. 85/1756) for *“The erection of noise baffle sidewall sheeting and roof to covered van closing area together with screen.”* Was approved on 13th February 1986. This demonstrates the longstanding incompatibility issues associated with the use of the Site as a bakery in close proximity to residential dwellings. Despite the careful management of the bakery by Greggs and the acoustic measures implemented, the uses were not considered be neighbourly uses and contributed to the vacation of the Site by Greggs to relocate to a purpose-built facility in a more accessible location.

7.25. In October 2013, the LBRuT published for consultation the Local Plan ‘Site Allocations Plan’. Within this draft Policy TW 11 (West Twickenham cluster, Twickenham) identified the Site for *“Mixed residential, start-up and small scale hybrid business space and/or primary school. Proposed Designation as key employment site.”* This document was not taken forward and has been superseded by the adopted Local Plan (July 2018), however this represents the Borough’s initial approach to the Site’s redevelopment which is considered to be more appropriate in this location.

7.26. There are a number of planning applications of relevance within the surrounding area which recognise the difficulties associated with industrial and commercial uses in this location within a residential area.

Norcutt Road

- 7.27. Norcutt House and Lockcorp House were previously in industrial use and the site has a long history in attempting to redevelop the site for alternative more appropriate uses. Planning permission (ref. 03/2570/FUL) was originally granted in November 2003 for the redevelopment of the site for residential accommodation with Class B1 Office Floorspace. It is understood that this application was not implemented.
- 7.28. A further application (ref.06/2018/FUL) was approved in January 2009 for the redevelopment of the site for residential accommodation with a single office block. This application was implemented save for the commercial element on the site of Lockcorp House. The office block was commercially unviable due to the site constraints and lack of demand for office in this location. The planning permission was accompanied by a S106 stating: *“In the event the developer has not implemented the single office block of 900 sqm within 2 years of a material start or by 31 December 2014, whichever is the later, the developer shall pay the Council the affordable housing contribution (£100,000).”*
- 7.29. A further planning permission (ref. 14/0157/FUL) for *“Demolition of the existing light industrial building and replacement with a detached three-storey building (with accommodation in roof) to provide 9 No.flats (all affordable housing) together with 6 off-street car parking spaces and associated amenity and landscaping areas.”* Was approved on 23rd June 2015 and the application was accompanied by a Deed of Variation to the 2009 S106 which set out the following: *“In the event that the developer has not implemented that part of the development comprising a single office block of 900 sqm within two years of a material start or by 1 March 2017, whichever is the later, the developer shall pay to the Council the Affordable Housing Contribution (£100,000), or fully*

implement the second planning permission (14/0157/FUL) by 1 March 2017 (e.g. implement 3 storey affordable housing building)."

- 7.30. This application successfully demonstrated that there was no demand for office accommodation in this location and instead sought a fully residential scheme for the site. The officer's report in relation to this application concludes that *"due to the restricted access; ... it is considered that the cessation of the employment use would be beneficial due to its poor access and relationship with surrounding residential properties."* It is evident that officers do not consider this adjacent site to be appropriate for commercial uses given the residential location. The site was however included within the 'West Twickenham Cluster' locally important employment area and 'West Twickenham Cluster' key office area despite acknowledging the unsuitable use of the site for employment uses.
- 7.31. Most recently, planning permission (ref.17/1033/FUL) was granted on appeal on 23rd May 2018 for the redevelopment of Lockcorp House, 75 Norcutt Road to provide student housing. This Inspector concluded that the need for student housing outweighed the need for employment floorspace in the Borough.

37 Hamilton Road

- 7.32. Planning permission (ref. 10/1691/FUL) and associated Conservation Area Consent were allowed on Appeal on 5th July 2011 for the conversion of the redundant industrial buildings at 37 Hamilton Road to residential accommodation. The Inspector's appeal decision acknowledged that the principle of the loss of the industrial use had been accepted and did not form reasons for refusal under previously dismissed Appeals in relation to application ref 06/3890/FUL and application ref. 08/2870/FUL.

-
- 7.33. The Inspector's decision in relation to the appeal against refusal of planning permission for application ref. 06/3890/FUL report sets out that *"It is accepted that vehicular access to the site from the main road network is poor. In particular Hamilton Road is a narrow residential street with high levels of on-street parking throughout the day and access by large volumes of heavy vehicles could create significant congestion. The photographic evidence submitted by residents graphically illustrates these problems. In my view, the intensification of industrial/commercial traffic on Hamilton Road would be unacceptable both in terms of the impact on resident's living conditions and the safety and free flow of traffic. Similarly, given the nature of the access, the use of the site/buildings for large scale warehousing or open storage would not be appropriate."*
- 7.34. The demonstrable decline demand for employment floorspace on surrounding sites as evidenced by these decisions, due to the evident site constraints and resulting lack of demand within the area for employment confirms that any redevelopment of the Site for such purposes is extremely unlikely to be successful or viable as it suffers from equally, if not more, severe constraints.
- 7.35. The existing smaller light industrial premises on Edwin Road comprising a mechanics garage currently operates within the residential area. The introduction of additional residential units will not adversely impact on the continued operation of these uses.
- 7.36. It is important to note that the supporting text of Policy LP40 sets out that *"It is imperative that sufficient well-located employment land is retained or redeveloped to meet modern business needs and support a strong sustainable economy."* [emphasis added]. As evidenced, the Site does not comprise well located employment and as such there should not be an emphasis to retain or redevelop the Site for employment land.

-
- 7.37. Draft London Plan Policy GG5 (Growing a good economy) sets out that those involved in planning and development must *“plan for sufficient employment and industrial space in the right locations to support economic development and regeneration”* [emphasis added].
- 7.38. Furthermore, paragraph 82 of the NPPF acknowledges that commercial uses should be located in appropriate areas and sets out that, *“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”*
- 7.39. It has therefore been demonstrated that there are severe site constraints which make the continued use of the Site for industrial uses inappropriate. The employment land is within close proximity to residential dwellings and accessed from residential streets demonstrates that the Site is not well-located employment land as such it is inappropriate for retention or redevelopment for employment use. The site restrictions therefore represent exceptional circumstances and the proposals for a mixed-use Development are therefore considered appropriate.

Local Plan Policy LP41 (Offices)

- 7.40. Local Plan Policy LP41 sets out that the Council will support a strong local economy and ensure there is a range of office premises within the Borough, particularly for small and medium size business activities within the Borough’s centres, to allow businesses to grow and thrive. The Site is outside a centre but will deliver 175 sqm flexible affordable B1 Class floorspace in line with the aspirations on the Policy to provide small business activities.

-
- 7.41. The Site lies within a designated Key Office Area, and part C of policy LP41 states that in such areas *“net loss of office floorspace will not be permitted. Any development proposals for new employment or mixed use floorspace should contribute to a net increase in office floorspace where feasible.”*
- 7.42. The Site is identified within the ‘West Twickenham, south of River Crane’ Key Office Area. The existing Site comprises a bakery within B2 Class use. Any office floorspace on the Site was purely ancillary to the primary bakery operations use, and consequently there is no existing B1 Class office floorspace on the Site. As such there will be no net loss of office floorspace on the Site. Notwithstanding this, the proposals comprise the delivery of 175 sqm of flexible affordable B1 Class floorspace.
- 7.43. Based on the Employment Density Guide (3rd Edition, November 2015), Employment density for a Small Business Workspace for ‘Co-Working’ would generate a density ration of 10-15 employees per sqm. The proposals would therefore create in the region of 18 full time jobs and would generate local employment. The terms of which will be secured within a S106 legal agreement. The proposals will provide high quality floorspace more appropriate within the residential environment.
- 7.44. The level of jobs provided as a result of the flexible commercial floorspace is commensurate with the location of this Site and represents the maximum reasonable amount of floorspace that can be sustained in this location as confirmed by commercial agents Milestone.
- 7.45. In relation to new offices, part D of policy LP41 states that *“The Council will support appropriate new office development by the following means: 1. Major new office development should generally be within the five main borough centres. 2. Smaller scale office development will be encouraged in suitable*

locations, particularly within the designated Key Office Areas. 3. New office accommodation should be suitable to meet future needs, especially to provide for the requirements of local businesses and small firms. 4. Design of office floorspace for flexible occupation and modern methods of working such as coworking space is encouraged. 5. The Council will require the provision of affordable office space within all major developments with over 1000sqm of office space; this will be secured through Planning Obligations.”

7.46. The Site is located outside of a centre in a residential area and therefore is not appropriate for major new office development. The proposed 175 sqm of floorspace is considered to be the maximum viable level that can be sustained in this location. A local demand report has been prepared by Milestone Commercial and submitted in support of and with this application which confirms that there is no demand for a significant level of office floorspace in this residential location outside of a centre and as such development of a significant level of offices in this location would be high risk. It is identified that there are high vacancy rates of offices and falling rents within the surrounding area, and Milestone’s opinion is that a fully commercial scheme would not be viable or sustainable due to the lack of demand.

7.47. The Site is located far from a local centre and the amenities required to support a commercial workforce of any scale would be require and generated by a Site of this size in this location. As such an overconcentration of office floorspace in this location would not be appropriate. A more intensive use of the Site would also generate additional trips which would not be appropriate in this location. The current proposals comprise a single accessible car parking space associated with the office floorspace. The floorspace will serve local need which will be secured within the S106 legal agreement, therefore it is considered that employees will access the Site on foot or by cycle. Furthermore, it is acknowledged that there are significant management issues

associated with the delivery of a high number of small units and the proposed B1 floorspace is considered to be the appropriate provision in this location. A scheme which comprises office-led redevelopment of the Site would therefore not be deliverable and there is no reasonable prospect of the Site coming forward for this.

- 7.48. As identified, it is proposed to provide small scale office development which is encouraged within Key Office Areas such as the 'West Twickenham Cluster', within which the Site is located. The new office accommodation will meet modern standards and will be flexible to allow for varied working practices and meet future needs, particularly to meet the needs of small local businesses.
- 7.49. Richmond's Assessment of Light Industrial and Storage Stock in Richmond upon Thames (2016) identifies that there is a great number of highly qualified entrepreneurs living in the borough looking for flexible work space for business start-ups near where they live. The proposals will respond directly to this demand and will deliver B1 Class workspace appropriate in this location.
- 7.50. It is understood that employees of Greggs Bakery were not local to the area and the majority travelled from outside the Borough. As such the closure of the existing Bakery and relocation elsewhere did not result in the loss of local jobs and therefore the provision of affordable workspace will enhance local job creation. Furthermore the Site operations associated with the bakery have now ceased and the Site is predominantly vacant and therefore in low intensity employment use, as such the level of employment compared to the present situation is likely to increase.
- 7.51. The London Plan Policy 2.7 (Outer London: Economy) identifies that stakeholders should seeks to address constraints and opportunities in the economic growth of outer London though various methods including *"managing and improving the stock of industrial capacity to meet both*

strategic and local needs, including those of small and medium sized enterprises (SMEs), start-ups and businesses requiring more affordable workspace including flexible, hybrid office/industrial premises.”

- 7.52. The proposed commercial floorspace is considered to contribute to the supply flexible, affordable small-scale office accommodation within the Borough which will meet the aspirations of the London Plan Policy 2.7, Draft London Plan Policy E3 and Local Plan Policy LP41.

Local Plan Policy LP42 (Industrial land and business parks)

- 7.53. Local Plan Policy LP42 sets out that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. Therefore, the Council will protect, and where possible enhance, the existing stock of industrial premises to meet local needs. The Site lies within locally important industrial land and therefore part B of the policy applies. This states that within locally important industrial land and business parks:

“a. the loss of industrial floorspace will be resisted unless appropriate replacement floorspace is provided.”

- 7.54. The supporting text of the policy identifies that *“the term ‘industrial land’ referred to throughout the policy covers land used for general industry, light industry, warehouses, open storage, self-storage, distribution and logistics and other similar types employment, as well as any other uses which fall within the B1c, B2 and B8 Use Classes or are considered to be Sui Generis.”*

- 7.55. As identified above, there are significant Site constraints which prevent the Site coming forward for industrial (as defined above) or employment generating redevelopment proposals. Despite the locational disadvantages identified within the LBRuT Employment Sites and Premises Study (2017)

which formed part of the Council's evidence base, the Site was allocated within the 'West Twickenham Cluster (including Gregg's Bakery and surroundings)' which seeks to protect the use of the land for employment. This approach is inconsistent with Paragraph 82 of the NPPF which directs industrial uses to suitably accessible locations. The allocation of the Site is also contrary to draft London Plan Policy GG5 which requires Borough's to plan for sufficient employment and industrial space in the right locations.

- 7.56. A marketing exercise has been carried out by Colliers International on behalf of Greggs Bakery to establish the demand for the Site. The marketing began in February 2018 for a period of 12 months and is ongoing. To date no meaningful offers have been received for the Site due to the severe site restrictions.
- 7.57. It is acknowledged within the Marketing Report that there are strong trends for West London industrial markets in prime locations such as Park Royal, Acton and Heathrow. However, it is recognised that these areas benefit from superior logistical and distributional links. The Site's location within a residential area is off-putting to industrial occupiers as the roads surrounding the Site are unsuitable for large delivery vehicles and has deterred a number of potential occupiers as demonstrated within the Marketing Report.
- 7.58. Offers have been invited for the Site in its current use as industrial/employment generating floorspace. The Marketing report concludes that the agents cannot let the Site due to the current configuration and Site restrictions.
- 7.59. A summary of the interest expressed in the Site is set out as part of the marketing report. It is confirmed that potential industrial or warehouse occupiers were put off by the physical constraints associated with the Site. The reasons were identified as: the size and configuration of the buildings which are not fit for current uses; the small yard and insufficient car parking area are an issue owing to the high Site coverage; the arrangement of the units within

the loading bay are tight and difficult to navigate in certain areas; concerns with regards to road access into the Site and traffic movement of HGV's and vans for deliveries; built up residential area and concerns with regards to potential restrictions on noise and hours of use.

- 7.60. The Site is now redundant and the bakery operations have ceased with part of the Site in continued use for associated operational functions. The Site is in poor condition, comprises asbestos and would need significant expenditure in order to bring it up to modern standards.
- 7.61. The Site was not considered to be suitable by any of the operators approached and no offers were forthcoming. There was interest in the Site for longer term redevelopment of the Site for residential however commercial occupiers are deterred by the evident Site constraints.
- 7.62. The report concludes that the redevelopment of the Site for similar employment generating uses would be an unviable prospect as the Site is too restricted to retain the same floor area and deliver sufficient servicing and car parking. As such there is no realistic prospect of a commercial operator occupying the Site either in its current condition or through redevelopment.
- 7.63. The local demand report prepared by Milestone Commercial which is a local independent commercial property agent supports the findings of the Marketing Report produced by Colliers and confirms that whilst there is demand for light-industrial units within the Borough, the registered demand is for purpose-built trading estates. Examples of these locally comprise Colne Road, Twickenham, Princes Works and Teddington Business Park. This type of commercial accommodation is able to accommodate car parking, open-plan design with mezzanine floors or double height workspace for fork-lift access in addition to turning circles for 7-tonne plus lorries. Additionally, these estates have the benefit of enhanced electricity capability and dedicated waste

management. The suitability of the Greggs Site to accommodate the same grade of floorspace is considered inappropriate.

7.64. It has been demonstrated within the Milestone report that there are plenty of much better located, more accessible, higher quality office buildings and Sites within Twickenham that are vacant and could accommodate any demand. This data is specific to the Site's location and is therefore a material consideration which should be taken into account in the consideration of the application.

7.65. Importantly Paragraph 120 of the NPPF identifies that *"Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:*

a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and

b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area."

7.66. In addition, draft London Plan Policy E7 clearly sets out that mixed-use of residential development proposals on 'Non-designated' Industrial sites should be supported in circumstances including where there is no reasonable prospect of the Site being used for industrial and related purposes. The proposal will comprise the mixed use Development of a Non-Designated Industrial Site for residential use and flexible affordable workspace. Whilst the Site is classified as a Non Designated Industrial Site, there is limited industrial activity taking place at the Site currently and the accommodation is poor

quality. The supporting text of the policy supports the co-location of residential and commercial uses. This is the approach that has been taken for the Proposed Development.

- 7.67. As demonstrated by the severe Site restrictions and resulting lack of demand for the Site confirmed within the marketing and demand reports, there is no reasonable prospect of the Site coming forward for redevelopment to provide industrial or fully commercial scheme. As such the protection of the Site for such use is contrary to the objective of the NPPF and draft London Plan Policy E7. The Site should be deallocated for employment uses on this basis.

“b. development of new industrial floorspace and improvement and expansion of existing premises is encouraged;”

- 7.68. It is acknowledged that there will be an overall reduction in the amount of industrial floorspace as a result of the proposals. However, the scheme can generate up to 18 full time jobs for local businesses within the Borough which is significantly higher than the Site currently delivers. The proposals would therefore deliver both a qualitative and quantitative improvement.

“c. proposals for non-industrial uses will be resisted where the introduction of such uses would impact unacceptably on industrial activities.”

- 7.69. As set out above, the existing smaller light industrial premises within the surrounding area comprising a mechanics garage and welders currently operate within a residential area, therefore the introduction of additional residential units will not adversely impact on the continued operation of these uses.

Continued use of the Site for industrial

- 7.70. Planning case law sets out that in considering the merits of a planning application, the ‘fall-back position’, meaning what the developer could do to the land without planning permission should be taken into consideration. This is evidenced in *Mansell v Tonbridge and Malling BC* which confirmed that officers were correct to compare the Proposed Development to the permitted fall-back position.
- 7.71. The ‘fall-back position’ in this case is that in theory, disregarding the associated Site constraints, highways and viability issues, the Site could be occupied by an alternative industrial occupier. Case-law confirms that the prospect of this coming forward does not need to be a real prospect but it is clearly possible given the Site allocations.
- 7.72. The current operation has an unrestricted consent, therefore if the disposal of the Site on the open market to an industrial occupier did materialise the Site could be utilised for 24 hour industrial operations without any planning restrictions on access, servicing, noise or emissions. This could occur without the need for a planning application. The fall-back position would therefore be that a new industrial use would continue to result in the same issues associated with HGV movements on the local highway and would exacerbate amenity issues associated with the incompatibility of the use with the neighbouring residential. The impact of the fall-back position should be given significant consideration in the determination of the application.
- 7.73. Alternatively, the buildings on the Site could be redeveloped for industrial or other employment uses. Given its location within the heart of a residential area, we anticipate any new consent for an industrial use would place tighter restrictions, commensurate with its residential location, on the hours of

operation and noise and amenity impact on residents. As has been demonstrated through the marketing exercise, the Site has reached the end of its life cycle and is in need of redevelopment and the residential location and issues associated with this has deterred any industrial occupiers making offers for the Site.

7.74. The limited extent to which the Site can be redeveloped and intensified due to the Site constraints is acknowledged within the LBRuT Sites and Premises Study (2017). Specifically, the existing buildings are developed hard up to the Site boundary which creates significant overlooking and sense of enclosure issues to the neighbouring properties. Any new Development would need to be set a sufficient distance away from these buildings which would limit the developable area. In addition, there is a sewer which runs through the middle of the Site which is currently built over. Under modern construction requirements, access to the sewer must be maintained which dictates the precise layout of the buildings and limits the quantum of floorspace that could be achieved. In addition, environmental requirements mean that new Development must be set back sufficiently from the River Crane to the north of the Site.

7.75. The Greggs operation had a high level of daily HGV trips which would be similar to any alternative industrial use on the Site. The HGV trips associated with an alternative employment use is assessed within the Transport Assessment which sets out that a similar operation could expect to generate around 68 HGV trips during a typical day, notwithstanding further HGV trips in the mornings and evenings and additional smaller LGV trips. This clearly demonstrates that the Site is not appropriate for continued industrial use. Furthermore, where a new application for industrial was pursued, the proposals would not be acceptable on highways grounds due to the proposed HGV movement within the residential area.

7.76. Furthermore, the de-contamination costs associated with asbestos present on the Site would erode any viable commercial return for an industrial development.

7.77. Notwithstanding the above, the prospect of delivering an industrial scheme on this Site which would be suitable for a modern industrial occupier within a residential area is considered to be unviable as is demonstrated within both the Colliers Marketing report and Milestone Demand Report.

Summary of Employment Assessment

7.78. In summary, it has been demonstrated that the Site is inherently unsuitable for employment use. The Site is a lower quality employment Site and does not provide the flexibility required for modern users as confirmed by commercial agents. The highways constraints associated with large vehicle movements on local residential street and the amenity impact of industrial uses on the surrounding residential properties makes the continued use of the Site for industrial inappropriate.

7.79. It is acknowledged that the majority of LBRuT industrial Sites are located within residential areas, however this alone is not sufficient to justify the retention of a use in an inappropriate location. The Site constraints, incompatibility with surrounding residential accommodation and highways impact of industrial uses in this location are well documented, including within the LBRuT Employment Sites and Premises Study (2017). The decline of industrial and employment uses in the area demonstrates further the locational disadvantages that the Site is subject to and the lack of demand in this location for employment uses.

-
- 7.80. It is acknowledged that whilst on a macro scale, demand is high in the West London market for industrial floorspace in prime locations such as Park Royal, Acton and Heathrow which benefit from superior logistical and distributional links. These Sites are not comparable to the Sites which are in a less than optimal location. The Site is protected by virtue of the Borough's lack of supply of employment floorspace across the Borough however on a local scale, it has been identified by local commercial agents that due to the Site constraints there is no demand for industrial floorspace in this location.
- 7.81. The Public Consultation exercise that has been undertaken in relation to the proposals for the Site acknowledges that the existing use of the Site for industrial purposes is inappropriate and incompatible with the surrounding residential uses. The reintroduction of industrial or commercial floorspace is not seen as a priority for local people in this location and the proposed use for residential is generally supported.
- 7.82. It is recognised that the draft London Plan seeks to retain industrial capacity within the London Borough of Richmond, however given the clear Site constraints, the Site is not considered appropriate for this use. It is considered that alternative Sites within the Borough that are located outside of residential areas on prominent roads would be more appropriate to accommodate this demand and that the Site should not be protected for redevelopment for employment uses without any reasonable prospect of the Site coming forward to this use.
- 7.83. There is also no reasonable prospect of the Site coming forward for employment led proposals on the Site due to the residential location of the Site, the highways impact on residential roads of a commercial scheme, and the invariable and evident lack of demand in this location. National planning policy guidance states that where there is no reasonable prospect of the Site

being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

7.84. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The loss of employment use on this Site is therefore contrary Local Plan Policy LP40, LP42 which seek to retain employment floorspace across the Borough, particularly within designated employment areas such as 'the West Twickenham Cluster (including Greggs Bakery and surroundings). However, the Site is subject to such severe Site restrictions that the continued use for industrial purpose would not be sustainable or viable and therefore exceptional circumstances apply that indicate a change of use resulting in loss of industrial floorspace is acceptable and should in this particular case and in these circumstances be permitted.

7.85. Furthermore, the loss of employment should be weighed against the significant benefits that the proposals will deliver including the delivery of much needed housing, including affordable within the Borough and the delivery of flexible, affordable commercial floorspace. The benefits are discussed further below.

Assessment of Proposed residential

7.86 The proposals will deliver 116 residential dwellings comprising a mix of apartments and family sized dwellings. A range of mix and tenures are proposed which will deliver a significant officer within the London Borough of Richmond.

-
- 7.87 Local Plan Policy LP 34 (New Housing) sets out the Borough’s housing target of 3,150 homes for the period 2015-2025. It is acknowledged that this target will be rolled forward until it is replaced by a revised London Plan target and the Council will seek to exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies. The policy identifies an indicative capacity for 1000-1050 new homes in Twickenham to 2025.
- 7.88 The NPPF paragraph 67 sets out that *“Planning Policies should identify a supply of a) specific, deliverable sites for years one to five of the plan period; and b) specific, developable sites or broad locations for growth, for years 6-10 and where possible, for years 11-15 of the plan.”*
- 7.89 Paragraph 73 of the NPPF sets out that Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (5% to ensure choice and competition; or 10% where the LPA demonstrates a five year supply through annual position statement; or 20% where there has been a significant under delivery of housing over the previous three years).
- 7.90 London Plan Policy 3.3 (Increasing Housing Supply) recognises the pressing need for more homes in London in order to meet housing need. Borough’s should seek to achieve and exceed the minimum borough annual average housing targets. The policy also identifies the need to realise brownfield housing capacity, including through mixed use redevelopment, especially of surplus commercial capacity and surplus public land and particularly that with good transport accessibility. Draft London Plan Policy GG4 (Delivering the

homes Londoners need), seeks to create a housing market that works better for all Londoners.

- 7.91 The adopted London Plan targets set out in table 3.1 identify a need within Richmond for 3,150 new homes across the ten-year period (2015-2025) which equates to 315 new homes per year.
- 7.92 Draft London Plan Policy H1 (Increasing housing supply) sets out the ten-year targets for net housing completions for LBRuT. The ten-year housing target is 8,110 which results in an annualised average of 811 new homes per annum. It is noted that *“boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans through their Development Plans and planning decisions”*. In particular on industrial sites that have been identified through other policies within the London Plan.
- 7.93 Richmond’s Annual Monitoring Report (AMR) 2017/18 (position at 1st April 2018) assesses the Borough’s housing supply in relation to the adopted London Plan requirements of 3,150 over the period 2015-2025. This sets out that net completions between 1 April 2015 to 31 March 2018 comprise 1,333 new dwellings. This leaves a total five year requirement of 1,363 new homes (including a 5% buffer) of which Richmond estimates a supply of 1,434 new homes coming forward over the five year period (March 2018- March 2025). When compared to current targets, Richmond demonstrates a 5.5 year housing land supply.
- 7.94 As identified above, the draft London Plan identifies a requirement to deliver 8,110 between 2019/20 – 2028/29 across the London Borough Richmond which equates to 811 units per annum. This is a significant increase from the current targets of 3,150 from 2015-2025 identified within the adopted London

Plan. Approximately 1000-1050 of these units should be accommodated in Twickenham as identified in Policy LP34.

- 7.95 As set out above, Richmond's latest AMR (2017/2018) sets out an estimated supply of 1,434 new homes over the five-year period until March 2025. When this land supply is considered against the new London Plan targets, it would fall significantly below the requirement for 8,110 new homes between 2019/20 – 2028/29. The revised delivery target currently set out in the Draft London Plan is 811 homes per annum which is more than a 150% increase.
- 7.96 The adopted Local policy position in relation to housing targets is not in line with the emerging London Plan targets. The ARM fails to identify a sufficient supply of deliverable sites in line with emerging targets and will therefore fall short of delivering the required housing for the Borough.
- 7.97 The demand for housing within the Borough is significant and this should be given greater priority over the restriction to retain the employment land uses in areas inappropriate for continued use.
- 7.98 This is evidenced in planning permission (ref. 17/1033/FUL) which was granted on Appeal on 23rd May 2018 for the redevelopment of Lockcorp House (also within the West Twickenham Cluster) to deliver student housing. Importantly, the Inspector's report notes that *"whilst the loss of this existing employment site would conflict with Policies DM EM2 and LP40, the proposed student accommodation would meet and identified housing need which policies DM HO 5 and LP37 support. On the evidence before me, including what I heard at the hearing, I consider the need for the development outweighs that of retaining the employment use of the site."*
- 7.99 The draft London Plan is at an advanced stage of production and as such the revised and increased housing targets are a material consideration in the

assessment of the proposals. Furthermore, given the significant demand identified within the emerging London Plan for new homes across the Borough, it is considered that the need for residential development in this location outweighs the need to retain employment use of the Site. The proposals will deliver a total of 116 residential units which will offer a significant contribution towards the proposed targets by delivering much needed housing within the Borough.

7.100 Housing delivery is a key priority across the capital and within the Borough and as such is a significant material consideration in the determination of the application.

7.101 There is a clear justification and significant benefits to be gained in the redevelopment of the Site for residential accommodation which is appropriate within the surrounding residential context. The proposed residential accommodation is supported in line with national objectives to increase the housing supply across the capital, the London Plan aspirations to deliver new homes across London and the Local Plan requirements to deliver a significant level of new homes specifically within West Twickenham. As such the proposals accord with the trust of the NPPF, London Plan Policy 3.3, draft London Plan Policy H1 and Local Plan Policy LP34.

7.102 Furthermore, the proposals will deliver a mix of units within apartments and dwelling houses comprising one, two, three and four bed units. A total of 49 of these units will be delivered as 3 and 4 bed family homes with in accordance with the aspirations of Local Plan Policy LP 35 (Housing Mix and Standards). The remainder of the units will be smaller 1 and 2 bedroom dwellings in order to deliver a range of unit sizes appropriate to the site-specifics of the location.

Affordable Housing

- 7.103 The proposals will deliver a total of 37% affordable housing by unit on Site. These comprise a mix of intermediate and affordable rented housing to address a broad sector of housing need in the Borough. As set out within the accompanying Affordable Housing Statement and Financial Viability Assessment, the affordable offer exceeds the quantum viably supportable on a current day basis and represents the maximum reasonable contribution that the scheme can make.
- 7.104 The proposed affordable offer comprises a mix of 9 affordable rented units and 34 shared ownership units. Of the affordable rented units, 8 will be delivered as family houses. The intermediate units will comprise 6 three bed family houses and 28 would be smaller one and two bed apartments. The proposals therefore deliver a mix of unit sizes and household affordability thresholds, allowing access to housing for a cross section of the market, including the local delivery of much needed larger family houses with private gardens.
- 7.105 Richmond's Annual Monitoring Report Housing Supply Summary and Trajectory sets out that the Borough have delivered only 11% (41 units) of their housing as affordable in 2017/18 and therefore the proposals for 43 affordable units (37% affordable on- site) should be seen in this context and as providing a significant amount of much needed affordable housing relative to the total provision of residential dwellings proposed.
- 7.106 Furthermore, the provision of affordable family housing for Richmond residents is a significant benefit arising from the proposals. The high-quality provision accords with LBRuT's strategic aim to increase family housing delivery in residential areas and would provide a substantial uplift in affordable family housing provision when considered against delivery over the last 5

years. The smaller shared ownership units also represent an opportunity to deliver smaller intermediate units for first time buyers.

- 7.107 The proposed affordable housing officer is considered to be significant for the borough and will deliver a high proportion of family sized units across a range of tenures. The proposals will deliver the maximum reasonable amount of affordable housing having regard to the Borough-wide target and individual site circumstances in accordance with Local Plan Policy LP 36. Further details of the affordable housing offer are set out within the Affordable Housing Statement.

Overall assessment of proposed land uses

- 7.108 The loss of the existing Industrial (B2 Class use) for the Site is no longer considered appropriate due to the location of the Site within a residential area resulting in unacceptable highways and amenity impacts. The existing operator has vacated the Site on this basis and marketing of the Site for continued industrial and redevelopment has been unsuccessful. The demand for industrial in the Borough is for purpose built facilities that are well located and can meet modern standards for industrial purposes as confirmed in both the Colliers Marketing Report and Milestone Demand Report. The existing Site does not deliver the standards required and redevelopment of the Site for industrial use would be subject to the same Site constraints and would exacerbate the same highways and amenity issues and has deterred industrial occupiers coming forward for this use.

- 7.109 Alternative employment generating uses have been explored for the Site. The Milestone Commercial Report identifies that demand for large scale office development is within main centres which are accessible locations for commuting. This is consistent with LBRuT's policy position. The Site is outside of a centre and is within a residential area. As such the proposed flexible

affordable B1 office floorspace proposed is considered to be more appropriate in this location and the level proposed is considered sustainable in this location. This use is compatible with the surrounding and proposed residential uses. It is therefore evident that due to the significant site constraints and resulting lack of demand for both industrial and large-scale office floorspace that the Site represents exceptional circumstances and should be released in order to deliver much needed housing for the borough.

- 7.110 The benefits of the proposed residential-led Development should be weighed against the loss of the industrial floorspace in this location. The proposals will deliver 116 new residential dwellings within the London Borough of Richmond upon Thames. Of these 43 will be provided as affordable housing with a mix of affordable rented and intermediate units comprising 37% affordable housing by unit. The proposals will deliver a significant amount of family housing which is a priority across the Borough and will also deliver a range of smaller units providing an offer for a range and mix of affordability.
- 7.111 The Housing need identified in the draft London Plan which targets 811 new homes per annum within the Borough are significant and should be given greater weight in the assessment of the proposals. The proposed 116 new residential units will make an important contribution to this overall housing supply with a significant contribution toward on-site affordable housing.
- 7.112 Whilst the loss of this existing employment Site would conflict with Local Plan policies LP40 and LP42, the proposed residential Development would meet an identified housing need supported by London Plan Policy 3.3, Local Planning Policy LP34 and draft London Plan Policy H1. Furthermore, the proposed flexible, affordable B1 office floorspace will meet an identified local need as supported by Policy LP40 and LP41. The need for the mixed-use, residential-led Development outweighs that of retaining the industrial use of the Site.

Design and Townscape

7.113. The Design and Access Statement explains the design vision and rationale behind the proposals and the Townscape, Visual Impact Assessment (TVIA) assesses the potential visual impacts of the Proposed Development on the setting of heritage assets and the character of the local and wider townscape. A summary of the key design, heritage and townscape conclusions are provided below.

Design

7.114. Paragraph 127 of the NPPF sets out that decisions should ensure that Development should be visually attractive as a result of good architecture, layout and appropriate and effective landscaping; Proposals should also 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.

7.115. London Plan Policies 2.10, 7.1 and 7.4 support good design and development that reinforces or enhances the character, legibility, permeability and accessibility of neighbourhoods.

7.116. Local Plan Policy LP1 (Local Character and Design Quality) sets out that 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.

7.117. In order to ensure development respect, contributes to and enhances the local environment and character, the following will be considered when assessing proposals: 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; sustainable design and construction, including adaptability, subject to aesthetic considerations; layout, siting and access, including making best use of land; space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features; inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and suitability and compatibility of uses, taking account of any potential adverse impacts of the collocation of uses through the layout, design and management of the Site.

7.118. Proposals will be assessed against the advice set out in the Twickenham Village Planning Guidance and LBRuT SPDs. Specifically in relation to the Gregg's Bakery Site, Twickenham Village Planning Guidance sets out that any development proposals would need to consider the following: The residential scale and character of the surrounding area to inform the siting / scale / massing of new development; Opportunities to provide high quality landscaping and, where appropriate, open space; Establishing a positive relationship with the River Crane along the northern edge of the Site, enabling new linkages to and along the river route; Impact on views across the Crane Valley; Appropriate levels of parking to avoid placing pressure on the surrounding streets; Relationship with the Edwin Road frontage to secure improvements to the street scene.

-
- 7.119. Policy LP 2(building heights) sets out that redevelopment of existing buildings will be required to respect and strengthen the setting of the borough's varied townscapes and landscapes, through appropriate building heights.
- 7.120. The replacement of the existing poor-quality buildings with a high quality designed building will make a significant contribution to the Site and surrounding area.
- 7.121. The Proposed Development comprises a range of buildings ranging from 2 storeys in the narrowest part of the site to 5 storeys to the north of the Site in the widest area of the Site fronting the River.
- 7.122. The proposed 'entrance buildings' provide a gateway into the Scheme Proposal from Edwin Road. The proposed two storey office building will address the street scene and will therefore follow the established building line and will enhance the street scene. The gable end of the proposed residential terrace will front the street adjacent.
- 7.123. In order to respond to the existing situation along the adjacent Norcutt Road and Crane Road, the houses are two and a half stories in height. The new mews street will deliver high quality new family homes which are considered appropriate in this context. Each of the buildings are given individual character with a variety of proposed materials, window types and architectural detailing derived from the local context.
- 7.124. The taller Riverside apartment buildings fronting the River Crane have a varied scale and roofscapes to break down the mass. A range of building heights here of between three and five storeys are proposed. The buildings are set back from the River to Crane and Railway line in order to provide a new landscaped courtyard and play area.

7.125. The proposals also comprises the retention and internal refurbishment of an existing property within the demise of the Site on Gould Road.

7.126. Overall, the proposals will optimise the potential of the Site to accommodate and sustain an appropriate amount and mix of development in accordance with paragraph 127 of the NPPF.

Townscape

7.127. Paragraph 127 of the NPPF identifies that scheme proposals should be *“sympathetic to local character and history, including the surrounding built environment and landscape setting.”*

7.128. Policy LP5 (Views and Vistas) seeks to protect the quality of the views, vistas, gaps and the skyline, which contribute significantly to the character, distinctiveness and quality of the local and wider area.

7.129. The Site falls within the ‘TCA3 Twickenham West’ however the Site is not currently considered to contribute to the townscape of this area. The Townscape and Visual Impact Assessment sets out that the scheme proposals enhances the townscape character and visual appearance of the local area. In accordance with the NPPF, PPG and local policies the Scheme Proposal will replicate the local context and historic character in terms of continuing to reflect the urban grain and building line present within the area.

7.130. Existing views to the Site are largely restricted to local views from the immediate townscape of Edwin Road, Crane Road and Gould Road and the surrounding properties. The proposed scheme will increase views of the Site from visual receptors in the medium distance. The proposed buildings will not interact or compete with local landmarks such as Athelsan Place. The Scheme Proposal will make a positive contribution to the townscape and enhance the

visual appearance of the local area in accordance with the NPPF, NPPG and local policies.

Amenity

7.131. The NPPF states at paragraph 127 that proposals should create places “*with a high standard of amenity for existing and future occupiers.*”

7.132. London Plan Policy 7.6 seeks to ensure that buildings do not cause unacceptable harm to the amenity of surrounding land.

7.133. Local Plan Policy LP sets out that all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. Regard should be had to the guidance set out within the Council’s SPDs and Village Planning Guidance.

7.134. Local Plan Policy LP39 identifies that all infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbour.

Overlooking

7.135. The existing relationship between the industrial buildings which are built hard up to the boundary of the Site, and the neighbouring properties on Norcutt Road is extremely close. The proposals will introduce a new mews street through the Site which follows the layout of the sewer which runs under the Site. The proposed mews dwellings have been carefully positioned and are set away from the boundary of the Site in order to improve this relationship with the existing neighbouring properties, particularly on Norcutt Road.

7.136. In order to mitigate potential overlooking and loss of privacy between the properties on Norcutt Road, the rear elevations of the east terrace houses have been designed to have reduced window openings at upper floors facing towards the neighbouring properties. Windows to the rear elevation will have frosted glazing to either bedrooms or bathrooms. The bedrooms will benefit from additional windows which do not face the Norcutt Road properties. The properties on Crane Road benefit from longer gardens and therefore maintain a greater distance between the properties.

7.137. The various apartment blocks across the Site (building types A, E, F & G) have been carefully designed and sited to avoid any overlooking impact to neighbouring properties. The balconies for the apartments have also been carefully designed and located to avoid any unacceptable overlooking, noise or disturbance to neighbouring occupiers in line with Local Plan Policy LP 8.

7.138. The distances between properties offer a substantial improvement and are commiserate with the distances between buildings in the surrounding area. The proposals will therefore meet the aspirations of Policy LP8 and have had regard to LBRuT Residential Development Standards SPD (adopted February 2006). Further analysis of the existing relationship and details of the proposed overlooking mitigation measures are set out within the Design and Access Statement.

Daylight and Sunlight

7.139. A Daylight and Sunlight report has been prepared by Point 2 Surveyors as part of the application submission which assesses the levels of daylight and sunlight within the Proposed Development as well as how it affects the daylight and sunlight amenity to the surrounding residential properties.

7.140. Policy LP8 sets out that where existing daylight and sunlight conditions are already substandard they should be improved where possible. Importantly, the report sets out that around 30 properties surrounding the Site will experience a benefit in daylight or sunlight as a result on the proposed development. A further 15 properties on Norcutt Road will experience a material gain to their amenity areas as a result of the proposals.

7.141. The proposed accommodation will benefit from good levels of internal daylight. The report concludes that overall the internal and external daylight and sunlight results demonstrate a very high level of compliance for a development in London and in fact the Development benefits a number of the surrounding properties when considering daylight, sunlight and sun on ground amenity. The proposals therefore accord with the aspirations of Policy LP8 which seeks to ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development.

Noise

7.142. An Acoustic Report has been undertaken in order to assess the existing noise sources and potential for residential accommodation on the Site. It is concluded that the building envelope acoustic performance can in principle be maintained by suitably selected building constructions. The proposals will therefore deliver good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected in accordance with Local Plan Policy LP10.

7.143. The report acknowledges that the Site lies within an area predominantly comprising existing residential dwellings which typically include external amenity space that will be subject to similar noise levels to the amenity spaces

under the proposed scheme. In fact, the noise environment for the existing residential dwellings will be improved as a result of the removal of industrial noise generating uses. The proposals will therefore have a positive impact on the existing noise environment in accordance with Policy LP8. Regard has been had to National Planning Guidance and LBRuT Development Control for Noise Generating and Noise sensitive Development SPD in the assessment of the proposals.

Housing quality

- 7.144. Local Plan Policy LP35 sets out that all new housing development should comply with the Nationally Described Space Standard. A Housing Quality Statement is included within the Design and Access Statement which should be read alongside this Planning Statement.
- 7.145. The proposals will deliver the following 90% of new build housing will meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% of all new build housing is required to meet Building Regulation Requirement M4(3) 'wheelchair user dwellings'
- 7.146. All of the units have been carefully designed to meet or exceed the housing standards. The proposals comprise a high proportion (83.6%) of Dual Aspect units.
- 7.147. Local Plan Policy LP35 sets out that adequate external space should be provided for all new housing development. Purpose built, well designed and positions balconies or terraces are encouraged where new residential units are on upper floors, where they comply with Policy LP8 (Amenity and Living Conditions).

-
- 7.148. The proposals provide private gardens associated with the individual mews dwellings. The garden sizes have been maximised as far as possible within the Site boundaries and are of a similar size to gardens in the surrounding area.
- 7.149. The apartments will all benefit from private balconies which will meet the minimum size requirements as identified under the Mayor's Standard 26. In addition, communal amenity space will be provided in the form of roof terraces on the lower levels of Building F.
- 7.150. Overall, the Proposed Development will provide high quality accommodation, meet the Nationally Described Space Standards and Policy LP35 of the Local Plan.

Landscaping

- 7.151. The proposals will remove the existing wall between the Site and the River Crane and open up the area fronting the River to provide a River walkway, landscaped area and incidental play space. The proposals respond to the aspirations of the Twickenham Village Planning Guidance. The Proposed Development will contribute to improvements and enhancements to the river environment and will provide public access to the River Crane in accordance with Local Plan Policy LP18.
- 7.152. A comprehensive landscaping strategy is included within the Design and Access Statement. This identifies the proposed landscape typologies across the Site including the proposed planting and materials.
- 7.153. The proposals comprise 410 sqm of dedicated on-site play space for 0-5 year olds located at the Riverside and on the roof terrace. An assessment of Local Play areas has been undertaken and it is considered that there is sufficient

existing provision within nearby play areas, additional play space can be accommodated within the surrounding area in accordance with Policy LP31 (Public Open Space, Play Space, Sport and Recreation).

Quality of the Commercial floorspace

7.154. There are few remaining industrial uses within the surrounding area due to the location within the residential area. The proposed two storey commercial building is located on Edwin Road opposite the existing industrial buildings. This is considered to be the most appropriate location on the Site in order to focus the commercial premises together. It is proposed to focus residential to the north of the Site which will allow the River Crane to be opened up to the public and landscaped.

7.155. The proposed commercial building will provide flexible floorspace which could be adapted to suit a future occupier's needs. The building will be delivered to shell and core and has been designed to BREEAM Excellent standards.

Transport and Highways

7.156. The Transport Assessment that accompanies this application provides details of the existing conditions at the Site, including: access; the road network; personal injury accident statistics on the public highway; public transport accessibility; car parking and the pedestrian environment. A summary of which is provided below.

7.157. The Travel Plan has been prepared in support of the proposed use of the Site which sets out the proposed sustainability measures considered as part of the proposals.

Parking

- 7.158. The proposals propose 116 car parking spaces across the Site of which 12 will be accessible spaces. A number of the car parking spaces will be provided within private garages and designated car parking spaces in front of houses and the remainder will be provided within a car park beneath apartment building F to the north of the Site. The proposals are within the maximum parking standards required as identified within Local Plan Policy LP45.
- 7.159. In addition, a car club space is proposed which will be publicly accessible for those with car club membership in the surrounding area. This will be located where the existing vehicle cross over is on Edwin Road and will therefore not impact of car parking spaces within the surrounding CPZ. The proposed car club will encourage sustainable travel choices in accordance with the aspirations of Local Plan Policy LP44.
- 7.160. Residents will be restricted from applying for car parking permits for the surrounding CPZ in order to avoid any impact on the surrounding parking pressure. This will be secured within the S106 Legal Agreement and residents purchasing or occupying the new homes will be made aware of the restriction.
- 7.161. The trip generation analysis shows that the residential use of the Site will eliminate daily HGV trips and that overall there will be a net reduction in trips compared to the previous situation. There would be no material impact to the highway and public transport network associated with the commercial element of the scheme. As such the Proposed Development will have a beneficial effect on the local road network.
- 7.162. On this basis, the Transport Assessment confirms that the proposals will not lead to increases in traffic and will not impact upon parking in the surrounding area in accordance with Policy LP8 and LP44.

Cycle parking

7.163. Cycle parking will be provided in line with the draft London Plan standards and Richmond's cycle parking standards in accordance with Local Plan Policy LP45. A total of 224 long stay and 4 short stay spaces are proposed across the Site.

7.164. Residential cycle parking will be provided either within internal garages, or dedicated cycle stores located within front gardens or within the bicycle stores within the apartment blocks. Short stay visitor provision will be accommodated with Sheffield stands within the public realm.

7.165. The proposals include the provision of 6 long stay spaces for the office element of the proposals which will be secure, weatherproof, conveniently located, well-lit and accessible within a sheltered store adjoining the officer building.

Servicing

7.166. The Development proposals provide for all servicing, deliveries and waste collection to occur within the boundary of the Site along the internal road. A swept path has been undertaken to confirm the servicing strategy for residential refuse collection.

Archaeology

7.167. The Site is located within an Archaeological Priority Area and an Archaeological Desk-Based Assessment has been prepared to assess the potential for archaeological remains on the Site in accordance with Local Plan Policy LP 7 (Archaeology).

7.168. On the basis of the information available including the Greater London Historical Environment Record, historical mapping, past development impacts and Proposed Development design (largely within the existing building footprints), the report concludes that that no further archaeological investigation is required.

Energy and Sustainability

7.169. London Plan Policy 5.2 requires development proposals to make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy: Be lean; Be Clean; Be Green. Residential development proposals should seek to be Carbon neutral. Draft London Plan Policy S12 maintains this target. Local Plan Policy LP22 is in line with the requirements of the London Plan.

7.170. An Energy Strategy has been prepared in relation to the proposed residential development. The proposals comprise the inclusion of centralised air source heat pumps with reverse cycle heat pumps in each of the apartments; individual air source heat pumps serving the townhouses; high efficiency mechanical ventilation with heat recovery 'high efficiency lighting'; sub-metering to mechanical plant; time-clock and temperature zone control of heating; and weather compensated control of heating.

7.171. In accordance with the London Plan Policy 5.2. and 5.4 and the Housing SPG, the Mayor will apply zero carbon targets for new residential development. The report confirms that overall the Site emissions provide a 37% improvement on combined building regulations L1 and L2 target emissions. In accordance with the policy requirements, further reductions to meet zero carbon homes will be met by way of a payment in lieu due to limitations at roof level for the placement of additional PV cells or other renewable technologies.

7.172. The proposals seek to deliver the highest standards of sustainable construction to mitigate the likely effects of climate change. A Sustainable Construction Checklist SPD has been prepared as part of this application in accordance with the requirements of Policy LP22 (Sustainable Design and Construction).

7.173. A BREEAM Pre-assessment associated with delivering the commercial building to shell and core is submitted in support of this application. The report sets out that the features and design criteria to be incorporated to achieve a BREEAM standard of Excellent. This accords with the requirement as set out within Local Plan Policy LP22.

Biodiversity

7.174. Local Plan Policy LP15 (Biodiversity) sets out that the Council will protect and enhance the borough's biodiversity. A biodiversity report has been prepared as part of this application submission. The report sets out the findings of the ecological desktop study and the findings of the Extended Phase 1 Habitat Survey and recommends further surveys for the ecological constraints on or near the Site. These include: surveys for bats and nesting birds; statutory protected species; and non-statutory protected species. Site wide measures are also recommended and proposed enhancements are encouraged including tree planting; inclusion of certain landscaping; and improvements to the River Crane.

7.175. It is concluded that where the proposed measures are incorporated, and any subsequent specie-specific survey reports are undertaken at the appropriate stage, there are no undue constraints with respect to ecology, to potential development. The proposals will therefore accord with Local Plan Policy LP15.

Flood Risk

- 7.176. Local Plan Policy LP21 (Flood Risk and Sustainable Drainage) sets out that all developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere.
- 7.177. A Flood Risk Assessment (FRA) has been undertaken which considers the impact of the proposed development. The Site is predominantly located within Flood Zone 1, denoting a low probability of flooding, with a small area along the northern boundary adjacent to the River Crane located within Flood Zone 2, denoting a medium probability of fluvial flooding.
- 7.178. The FRA report demonstrates that the Proposed Development has a low probability of flooding from fluvial, tidal, groundwater and artificial sources, and confirms that surface water runoff can be managed sustainably to ensure that flood risk is not increased elsewhere. It is considered that the information contained within this report satisfies the requirements of the NPPF and Local Policy.

Air Quality

- 7.179. Local Plan Policy LP10 (Local Environmental Impacts, Pollution and Land Contamination) promotes good air quality and new technologies.
- 7.180. An Air Quality Assessment has been undertaken in order to assess any likely air quality impacts associated with the Proposed Development upon the surrounding area and to consider whether the Site's location is considered suitable for the proposed uses.

7.181. In summary, the AQA sets out that the impacts of the operational phase on local quality are negligible for all pollutants and the residual effect is not significant. The Proposed Development is not able to achieve air quality neutral for transport emissions, as such mitigation will therefore be required to address these emissions. The Development proposals comply with national and local policy for air quality.

7.182. Overall, the proposed Air Quality is considered to improve as a result of the proposals which remove existing industrial emissions on the Site.

Summary and Public Benefits Statement

7.113. The proposals are considered to deliver significant benefits which will outweigh the loss of the employment use of the Site. These include the following:

- Delivering 116 residential dwellings of which 42% will be family sized units in line with the demand within the Borough, which will contribute to the Borough's much needed housing supply;
- 175 sqm of flexible, affordable commercial floorspace will be provided at 50% of market rent to meet local need;
- 37% affordable housing will be provided on Site of which 9 will be affordable for rent and 34 will be shared ownership;
- The proposals will result in the redevelopment of a brownfield Site which currently comprises out dated industrial buildings in poor condition and configuration;
- There will be significant amenity improvements to neighbouring properties by providing residential into the existing settlement area and removing unneighbourly industrial uses;

-
- Significant highways and safety improvement will be achieved by removing the need for HGV's trips on residential streets;
 - Opportunities for opening up access to the River Crane at the northern end of the Site for landscaping and playspace.
 - The proposals will create a new street scene and improve the visual appearance of the Site.

8. PLANNING OBLIGATIONS & SECTION 106 HEADS OF TERMS

- 8.1. Regulation 122 of the Community Infrastructure Levy Regulations (2010) states that planning obligations may only constitute a reason for granting planning permission for the Development if the obligation is:
- necessary to make the Development acceptable in planning terms;
 - directly related to the Development; and
 - fairly and reasonably related in scale and kind to the development.
- 8.2. The above tests are set out in paragraph 56 of the NPPF. Paragraph 54 sets out that Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 8.3. Paragraph 55 sets out that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the Development to be permitted.
- 8.4. London Plan Policy 8.2: 'Planning Obligations' states development proposals should address strategic as well as local priorities in planning obligations. Affordable housing, Crossrail and other public transport improvements should be given the highest importance. Importance should also be given to climate change, learning and skills, health facilities and services, childcare provisions and the provisions of small shops.
- 8.5. London Plan Policy 8.3: 'Community Infrastructure Levy' (CIL) refers to the Mayor bringing forward a draft charging schedule to enable CIL to fund strategically important infrastructure, focussing on Crossrail. The Mayor has

brought forward a CIL charging schedule, which was formally adopted on 1 April 2012. In addition, LBRuT adopted a charging schedule effective from 1 November 2014.

8.6. Having regard to the priorities set out in Regulation 122 and the regulations and guidance set out above, it is expected that the conditions and obligations will broadly cover the following Heads of Terms (HoT).

- Restrictions on access to car parking permits within the surrounding CPZ.
- Car club provision.
- Carbon reduction Payment in Lieu
- Affordable workspace (provided at 50% of Market Rent) to be secured for any small and start up organisations.

8.7. The Draft Heads of Terms are provided without prejudice.

9. CONCLUSIONS

- 9.1. The Site comprises previously developed land within a residential area of West Twickenham. The existing buildings have reached the end of their life cycle and are no longer fit for purpose. The main industrial uses across the Site have now ceased and the Site is no longer considered appropriate for industrial use. The Site therefore represents an excellent development opportunity which should be maximised.
- 9.2. The redevelopment proposals will deliver 116 new residential dwellings within the LBRuT which will make an important contribution to the overall housing supply within the Borough. The proposals comprise a total of 43 (37%) on-site affordable housing which will be a mix of affordable rented and intermediate units. The proposals will deliver a significant amount of family housing with a range of smaller units providing a range and mix of units across the Site.
- 9.3. The proposals also comprise the provision of 175 sqm GIA of modern flexible affordable B1 office workspace which will serve small local businesses.
- 9.4. The demolition of the existing buildings which cover the majority of the Site will improve the amenity in the surrounding area. The Proposals have been carefully designed to respond to the Site and surrounding context and maximise the opportunities for the Site. The proposed architecture and landscaping represent high-quality design which will significantly improve the townscape and street scene. The proposals will offer enhancements to the public realm by opening up access to the River Crane to the north of the Site and providing on-site play space.
- 9.5. Overall, the Proposals comprise a significant opportunity to deliver a high quality residential led mixed use scheme in LBRuT and it is respectfully requested that full planning permission is granted.

APPENDIX 1 – PLANNING HISTORY

Appendix 1 – Full Planning History

- 1.1 Application (ref. 08/3145/FUL) for *“Erection Of A Betta Absorptive Noise Barrier To The Rear Of 20-22 Crane Road, Twickenham.”* was approved on 14th November 2008.
- 1.2 Application (ref. 85/1756) for *“The erection of noise baffle sidewall sheeting and roof to covered van closing area together with screen.”* was approved on 13th February 1986.
- 1.3 Application ref. 84/0871 for *“Retention of two portable buildings, one for use as office and one as a store.”* Was refused on 19th February 1985.
- 1.4 Application ref. 82/0536 for *“Erection of a first floor extension to existing office building to provide additional ancillary office accommodation.”* Was refused on 26th October 1982.
- 1.5 Application ref. 81/0893 for *“Erection of a single storey building to provide ancillary office accommodation.”* Was granted permission on 14th October 1981.
- 1.6 Application ref. 79/1158 for *“Erection of a two storey building to provide ancillary office accommodation”* was granted permission on 8th January 1980.
- 1.7 Application ref. 79/1153 for *“Erection of a building to house flours storage silos was granted permission on 8th January 1980.*
- 1.8 Application ref. 77/1161 for *“Erection of new escape staircase.”* Was granted permission on 17th January 1978.
- 1.9 Application ref. 72/0899 for *“Demolition of existing cold store building and erection of new single storey cold store building at rear of existing factory buildings”* was granted permission on 6th February 1973.
- 1.10 Application ref. 71/1662 for *“Use of workshop for tray washing and storage purposes.”* Was approved on 22nd October 1971.

- 1.11 Application ref. 70/1198 for "Erection of covered van loading area." Was refused on 18th November 1970.
- 1.12 Application ref. 69/1623 for *"Installation of new petrol pump and resiting of diesel pump and underground storage tanks."* Was approved on 10th October 1969.
- 1.13 Application ref. 69/1567 for "Erection of vehicle washing canopy." Was granted on 8th October 1969.
- 1.14 Application ref. 68/2313 for "Erection of two bulk flour silos" was granted permission on 7th February 1969.
- 1.15 Application ref. 68.1992 for "Installation of underground diesel oil storage tank and pump." Was granted permission on 5th November 1968.
- 1.16 Application ref. 67/2464 for "Construction of petrol storage tank and installation of petrol pump" was granted on 26th February 1968
- 1.17 Application ref. 66/2337 for "Installation of 1,000 gallon overground diesel storage tank." Was approved on 27th February 1967.
- 1.18 Application ref. 66/0970 for "Erection of chill room for dough retarding" was granted permission on 20th July 1966.
- 1.19 Application ref. 62/1320 for "Extension to form despatch bay." Was granted permission on 4th February 1963.
- 1.20 Application ref. 62/0854 for "Erection and extensions to despatch bay for bakery." Was refused on 8th November 1962.
- 1.21 Application ref. 62/0557 for "Continuation of use of hardstanding for vehicles" Was granted on 13th July 1962.
- 1.22 Application ref. 62/0231A for "Erection of building for short term storage of unsold bakery products." Was granted on 2nd May 1962.

- 1.23 Application ref. 62/0231B for "Erection of a boiler house extension at the rear." Was granted on 2nd May 1962.
- 1.24 Application ref. 61/0295 "Continued use for vehicle hardstanding." were granted permission 3rd July 1961.
- 1.25 Application ref. 61/0159 for "Extension to existing bakery." Was granted permission on 22nd March 1961.
- 1.26 Application ref. 60/0334 for "Re-siting flues and vent stacks." Was approved on 24th May 1960.
- 1.27 Application ref. 60/0011 for "Construction of hardstanding for vehicles." Was approved on 1st April 1960.
- 1.28 Application ref. 47/7143 for "Extension of existing bakery." Was granted permission on 20th June 1956.
- 1.29 Application ref. 47/6310 for "Use of van storage and bread despatch building as a bread bakery incorporating ovenroom, dough room and flour store." Was approved on 21st July 1955.
- 1.30 Application ref. 47/6296 for "The erection of boiler house" was approved on 27th July 1955.
- 1.31 Application ref. 47/6295 for "The erection of engineers workshop and store, petrol pump and storage tank." Was approved on 21st July 1955.
- 1.32 Application ref. 47/5859 for "An extension to existing bakery." Was approved on 23rd March 1955.
- 1.33 Application ref. 47/4834 for "Extension to existing bakery." Was approved on 21st April 1954.

- 1.34 Application ref. 47/4836 for *“Use of existing building as van store and for despatching of bread.”* Was approved on 21st April 1954.
- 1.35 Application ref. 47/4387 for *“The erection of boiler house and chimney as extension to new coachbuilding works.”* Was approved on 19th November 1953.
- 1.36 Application ref. 47/3815A for *“Erection of building for coachbuilding and vehicle body repairs and maintenance.”* Was approved on 20th April 1953.
- 1.37 Application ref. 47/3337 for *“The erection of storage building at rear.”* Was approved on 15th August 1952.
- 1.38 Application ref. 47/2667 for *“Extension of existing premises for use as plant bakery.”* Was approved on 8th August 1951.
- 1.39 Application ref. 47/0165 for *“The execution of War Damage Repairs.”* Was granted permission on 22nd November 1948.

APPENDIX 2 – IMAGES OF THE EXISTING SITE CONSTRAINTS



SPECTRUM TS

THERMOKING

GREGGS

DAF

NO CASH OR VALUABLES ARE TRANSPORTED IN THIS VEHICLE

DAF
SERVO



SPECTRUM TS

fresh baked
and hand

NO CASH OR
VALUABLES ARE
TRANSPORTED IN
THIS VEHICLE

DAF
55.220

MARSH FARM ROAD
Leading to
TALBOT ROAD

13'6"
36 yards





Freshly baked
every day

GREGGS
The home of fresh baking™

GREGGS
☎ 0808 1473447
getintouch@greggs.co.uk

LIMITED TO
50

GREGGS The home of fresh baking™

NX09
DUY

GRAY
ADAMS



MARSH FARM
Leading to
TALBOT ROAD



Fresh baked
and hand



GREGGS

The home of fresh baking™

0800 1473447



d made
shops





APPENDIX 3 – NEWSPAPER ARTICLES

News Shopper

[Home](#) [News](#) [Sport](#) [What's On](#) [Announcements](#) [Buy & Sell](#) [E-newspapers](#) [Contact Us](#) [Competitions](#) [Lists/Laughs](#)
[News](#) [Bromley](#) [Bexley](#) [Greenwich](#) [Lewisham](#) [Dartford & Swanley](#) [Your News](#) [National](#)

30th July 2004

Bakery lorries 'causing havoc' to residents

Lucy Oldham



Get the latest local news straight to your inbox every day

[Sign up](#)

"PLEASE don't ignore us, Richmond council" is the plea from residents in Gould Road, Twickenham, this week who are exasperated by large lorries causing havoc outside their homes.



Simon Cutler sent photographs to the Times of a pavement bollard he claims was knocked over by a lorry delivering to Greggs Bakery in Gould Road. Another picture shows a group of bakery staff 'bumping' a private parked car aside to make way for a delivery lorry.

Mr Cutler lives in Gould Road and 18 months ago he and other residents invited a councillor to meet them to discuss implementing a 7.5 ton vehicle limit for Edwin Road, Crane Road, May Road and Gould Road.

We use cookies to give you the best experience on our website and bring you more relevant advertising. [Learn more about cookies](#)

OK

Mr Cutler says: "We were assured by incoming supplies manager Ian Blackwood of Greggs Bakery plant that no vehicle would attempt a delivery or run its engine in Gould Road before 7am. Yet this morning I was woken by a lorry idling its engine at 6.30am.

"It was impossible for

Mr Cutler says many about staff discarding

A spokesman for the and congestion. The the size of supplier v

"As part of our continuing survey which was carried out in the report."

He also believes that

A council spokesman

"Funding was sought for Heavy Goods Vehicle

"This would have tackled the issue by seeking funding to provide

Microsoft

Toney uses *Inking* on Windows 10 to get creative with his lessons.

Windows 10 PCs do more. Just like you.

See site for conditions.

d and I s

products towels an

community is to limit before 7am

we recently Greggs ha

e bakery

nd have

on through routes

e area. U

up Gould Road."

also unhappy in Twin Road.

to reduce traffic noise including limiting

environmental foundations from

to implement a

bakery.

We are still



Sponsored stories

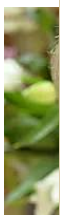
White Off the Shoulder Glamor Casual Dress

sheinsideuk

Office Milano Two Point Espadrille TAUPE KI

lona

MADE



4 Little Equit

rey



nn! Ant at host as...

We use cookies to give you the best experience on our website and bring you more relevant advertising. [Learn more about cookies](#)

OK

Sponsored Ads

Ads powered by plista



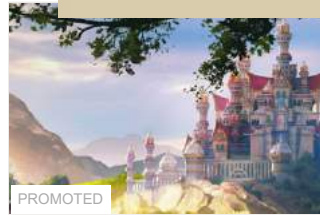
The WC that cleans you with water.

Geberit



£17pm +£10 upfront with 250MB 4G UK data

Vodafone



The most addictive game of the year!

Elvenar – Free Online...



Food shopping online - delivery from £1

Morrisons

Most popular

Most commented

We use cookies to give you the best experience on our website and bring you more relevant advertising. [Learn more about cookies](#)

OK

- 1 A dead rat, gnawed vegetables and two-week-old food were found in a Bromley restaurant
 - 2 A schoolgirl was sent home for her 'dyed hair and wrong shoes' on the first day - and her mum is not happy
 - 3 Shocking footage shows 'idiot' motorbike riders pulling wheelies on roads and pavements as they speed through Erith
 - 4 Girl gets detention on first day at 'big school' - for not having a calculator
 - 5 Stormy afternoon predicted for London
-
- 6 Police warn public not to approach this woman wanted for fraud
 - 7 WATCH: This is the moment a 86-year-old woman was 'pick-pocketed' in an Iceland supermarket
 - 8 Croydon minicab driver admits he caused the death of a Bromley motorcyclist
 - 9 A Greenwich pub has been named best for dining in London
 - 10 St Paul's Cray man jailed for stealing charity box from hospice shop
 - 11 Robinson speaks candidly about Duchatelet after becoming Charlton owner's longest serving manager
 - 12 'Attempted robbery' on group of teenagers in Gravesend
 - 13 Topping up your Oyster card has been made easier with TfL's new app
 - 14 Charlton manager plays down move for free agent
 - 15 A man has suffered life-changing injuries after being victim of a hit-and-run crash with a BMW in Kidbrooke
 - 16 The best Bexley buildings are going to be opened up to the public for free as part of London wide scheme
 - 17 Parents honour baby who died at six months by opening hospital sensory room
 - 18 Charlton injury update: Midfielder will miss Southend and Wigan games
 - 19 A man has suffered a cardiac arrest at a gym in Bexleyheath
 - 20 Chislehurst school spends £90,000 on new study areas

[Read more >](#)



Popular Articles Today



A dead rat, gnawed vegetables and two-week-old food were found in a Bromley restaurant



We use cookies to give you the best experience on our website and bring you more relevant advertising. [Learn more about cookies](#)

OK



Shocking footage shows 'idiot' motorbike riders pulling wheelies on roads and pavements as they speed through Erith



WATCH: This is the moment a 86-year-old woman was 'pick-pocketed' in an Iceland supermarket

Most popular

Most commented

We use cookies to give you the best experience on our website and bring you more relevant advertising. [Learn more about cookies](#)

OK

Richmond & Twickenham TIMES

News **Your News** Pictures National News

EXCLUSIVE 24th February 2012

Bunfight breaks out over Greggs' Twickenham depot

Exclusive by [Rachel Bishop](#)



f t G+ w e 儻 37

Get the latest local news straight to your inbox every day

Sign up

A Greggs lorry was allegedly attacked at a depot in Twickenham last night and one man attempted to block others getting into the site this morning.

A shower screen and white paint were allegedly thrown at the lorry, which was parked in the depot serving 138 stores across London and the south-east.

Greggs has reported the incident to the police and said it was treating it "with great concern".

Neighbours have complained about the noise caused by HGV lorries that often lined Edwin Road, where the industrial-scale bakery is situated.

Alan Martin, of Edwin Road, has lived on th

owell, who has lived there for 35 years.

This morning he was so incensed by proble
a young mother dodge through each vehicl

noise and congestion which he said made
used to move.

We use cookies to give you the best experience on our website and bring you more relevant advertising. [Learn more about cookies](#)

OK

The main problem is the noise the lorries make, but there's also problems with litter, congestion and parking - with the workers parkin

However, despi

He said: "I don't think that's right. I do not agree with that kind of action."

Manager Amanda Eastlaugh called a meeting with residents on Wednesday, February 22, which attracted about 50 people.

Following the meeting, residents joined forces and were now planning a campaign against Greggs.

After just six weeks living across the road from the site Edwin Road resident, Simon Baird, 34, distributed a leaflet to neighbours, calling for Greggs bosses to relocate the site or ban lorries accessing the site between 10pm and 6am.

He said: "I think the meeting has actually been more detrimental to them, because now we have all met and exchanged numbers. There's a really strong community spirit."

Mr Baird's housemate, Tim Spurling, 34, who has lived at the property for three-and-a-half years, had been aware of problems with the site for a long time.

He said: "People are getting to the stage where they cannot take anymore - especially the older residents."

Mr Baird, whose bedroom is at the front of the house, said he was often woken throughout the night by the trucks and the busiest times were at midnight, 2am and 5am.

The next step for residents was to take the matter to the council, with the possibility of seeking a noise abatement notice for the site.

A Greggs spokesman said: "We understand residents are concerned and we are treating their concerns seriously.

"We will try to do as much as possible. We are now looking at ways to reduce the impact on the local people."

The battle between Edwin Road residents and Greggs has been long running, with one person stating at the meeting on Wednesday that he had been fighting against these problems for 50 years.

Mr Martin said: "I think that they have outgrown their premises, because they have trucks queuing in the road - whereas

Police were unable to comment.

f t G+ w e 愧 37

Sponsored stories

Recommended by

We use cookies to give you the best experience on our website and bring you more relevant advertising. [Learn more about cookies](#)

OK

Office Milano Two Part Espadrille TAUPE KID SUEDE

Office

Colorful Open Front Outerwear With Tribal Print Tape Detail

sheinsideuk

Stretto Sideboard, Grey

MADE.COM

Reginox White Ceramic 1.0 Bowl Kitchen Sink with...

victorianplumbinguk

Premium Minivan BCN - Sitges

suntransferses



BREAKING: UK's BIGGEST lottery draw of £401...

Insider Lifestyles

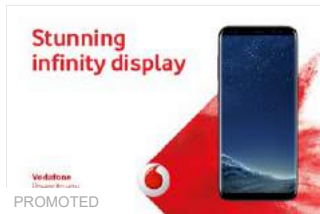
Sponsored Ads

Ads powered by plista



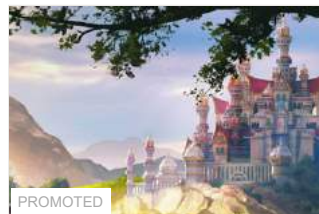
The WC that cleans you with water.

Geberit



£54pm +£30 upfront, with 4GB 4G UK data.

Vodafone



The most addictive game of the year!

Elvenar - Free Online...



Food shopping online - delivery from £1

Morrisons

**Most
popular****Most
commented**

- 1 Richmond restaurant creates take-away menu for dogs
- 2 BBC executive chef and a restaurant entrepreneur team up with a Lions rugby star to bring their 'M' brand to Twickenham
- 3 'Chaos' as a primary school in Teddington needs 'immediate' work as term starts
- 4 UPDATE: Parents 'frustrated' as meeting delayed to discuss the 'chaos' caused by Stanley Primary School's building disruptions

We use cookies to give you the best experience on our website and bring you more relevant advertising. [Learn more about cookies](#)

OK

- 6 Woman relives memories at Twickenham restaurant that shut for good last month after 15 years of service
- 7 Feedback from Twickenham Riverside consultation 'being fed into designs'
- 8 This is the most expensive place to buy a pint in Britain - and it's not London
- 9 'We need to recognise the sacrifice they have made': Defence minister for veterans shows support for The Poppy Factory in Richmond
- 10 Stormy afternoon predicted for London
- 11 A team of women averaging 68 take on a 21.6 mile rowing race for charity
- 12 Metropolitan Police 'to improve' after equality and human rights investigation
- 13 How does yours compare? This is the 'essential' uniform Prince George has to wear to school and how much it costs
- 14 TfL app allows users to top up Oyster card anywhere
- 15 Enjoy afternoon tea at Strawberry Hill House with Alan Titchmarsh
- 16 Permission granted for new travellers' site
- 17 Eating dinner, reading the paper and talking on the phone - an unmarked police lorry caught 147 drivers on camera breaking the law on Surrey's roads
- 18 'Dirty changing rooms, blocked fire doors and panic alarms not working': Richmond resident extremely concerned about 'deterioration' of Pools on the Park
- 19 New Nando's restaurant to arrive in Twickenham later this year
- 20 The first British Yemeni is breaking the ice for charity as she steps foot on the South Pole

[Read more >](#)

We use cookies to give you the best experience on our website and bring you more relevant advertising. [Learn more about cookies](#)

OK

Get involved with the news in your community

Send your stories and photos now

Popular Articles Today



BBC executive chef and a restaurant entrepreneur team up with a Lions rugby star to bring their 'M' brand to Twickenham



We use cookies to give you the best experience on our website and bring you more relevant advertising. [Learn more about cookies](#)

OK

UPDATE: Parents 'frustrated' as meeting delayed to discuss the 'chaos' caused by Stanley Primary School's building disruptions



Woman relives memories at Twickenham restaurant that shut for good last month after 15 years of service



'Chaos' as a primary school in Teddington needs 'immediate' work as term starts



Most popular

Most commented

