



Greggs Bakery / Twickenham

Planning Statement

Prepared by DP9

05 August 2022



Greggs Bakery Site and No. 2 Gould Road, Twickenham, TW2 6RT

PLANNING STATEMENT

August 2022

DP9 Ltd.

DP9 Ltd
100 Pall Mall

London

SW1Y 5NQ
Tel: 020 7004 1700
Fax: 020 7004 1790

CONTENTS

1.	INTRODUCTION	3
2.	SITE CONTEXT	8
3.	PLANNING HISTORY	10
4.	PRE-APPLICATION DISCUSSIONS & CONSULTATION	13
5.	APPLICATION PROPOSALS	16
6.	PLANNING POLICY FRAMEWORK AND OVERVIEW	20
7.	PLANNING POLICY ASSESSMENT	22
8.	PLANNING OBLIGATIONS & SECTION 106	Error! Bookmark not defined.
9.	CONCLUSIONS	57

1. INTRODUCTION

1.1 This Planning Statement is submitted to the London Borough of Richmond upon Thames (LB Richmond) on behalf of London Square Developments Limited (the “Applicant”) in support of an application for planning permission for the proposed redevelopment of the Greggs Bakery Site and No 2 Gould Road, Twickenham, TW2 6RT (the “Site”).

1.2 The applications seeks planning permission for:

‘Demolition of existing buildings (with retention of a single dwelling) and redevelopment of the site to provide up to 116 residential units and 175 sqm commercial floorspace (Use Class E) with associated hard and soft landscaping, car parking and highways works and other associated works’

This Planning Statement has been prepared by DP9 Ltd and provides the planning case in support of the proposed development. It assesses the development in the context of relevant adopted and emerging planning policy and guidance at national, regional and local levels, together with other material considerations.

Supporting Submission Documents

1.3 This Statement should be read in conjunction with the documents, plans and technical studies submitted to accompany the application, as set out below.

- 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);
 - Affordable Housing Assessment (Prepared by DS2);
 - Air Quality Assessment (Prepared by AQ Consultants);
 - Archaeology Desk-Based Assessment (Prepared by RPS);
 - BREEAM Pre-Assessment (Prepared by Sol Environmental);
 - Statement of Community Involvement (Prepared by Cascade);
 - CIL Additional Information Form (Prepared by DP9 Ltd);
 - Construction Management Plan (Prepared by London Square Ltd);
 - Construction Logistics Plan (Prepared by Velocity);
 - Daylight Sunlight Report (Prepared by Point2);
 - Delivery and Servicing Strategy (Prepared by Velocity);
 - Phase 1 + Phase 2 Environmental Assessment (Prepared by AP Geotechnics);
 - Ecology Report (including Ecological Enhancement Statement) (Prepared by Richard Grave Associates);
 - Energy Strategy (Prepared by Desco);
 - Financial Viability Statement (Prepared by DS2);
 - Fire Safety Statement (Prepared by Hoare Lee);
 - Flood Risk Assessment (including SuDs Statement and Foul Sewage Assessment) (Prepared by Watermans);
 - Health Impact Assessment (Prepared by Trium);

- Lighting Strategy (Prepared by Desco);
- Marketing Demand Report (Prepared by Milestone);
- Marketing Report (Prepared by Colliers);
- Noise and Vibration Impact Assessment (Prepared by Paragon);
- Sustainable Construction Checklist (Prepared by Desco);
- Townscape, Built Heritage and Visual Impact Assessment (Prepared by Arc);
- Transport Assessment (including Healthy Streets) (Prepared by Velocity);
- Travel Plan (Prepared by Velocity);
- Utilities Statement (Prepared by Desco)

Overview of Proposed Development

- 1.4 The proposed development is seeking detailed planning permission for:
- Demolition of existing industrial buildings across the Site with the retention of an existing two storey end of terrace dwelling house on Edwin Road.
 - Redevelopment of the Greggs Bakery Site through the provision of a variety of buildings ranging from 2 – 5 storeys, comprising delivery of mews housing, apartment buildings to the north of the Site fronting the River Crane and the delivery of an industrial building fronting Edwin Road.
 - Delivery of 116 x residential units (Use Class C3) (33 x 1 bed, 33 x 2 bed, 46 x 3 bed, 4 x 4 bed) including 58 Affordable Housing units (47

affordable rent and 11 shared ownership) equating to 50% of residential provision by unit or 40% by habitable room.

- Provision of 175sqm of affordable Class E floorspace.
- Creation of new street through the site.
- Car parking provision on site including 100 residential spaces, 1 commercial and 1 public on street car club parking space.
- 224 cycle parking spaces (220 residential cycle parking spaces and 4 commercial)

1.5 The proposed development provides the opportunity to regenerate this underutilised site through the demolition and refurbishment of the existing poor-quality buildings and replacement with a highly sustainable mixed-use development. The proposed scheme has evolved through an extensive planning history which has included pre-application discussions and wider stakeholder consultation processes.

1.6 This Planning Statement assesses the planning considerations associated with the proposed development in the context of national, regional and local planning policy and guidance. The Statement concludes that the proposed development accords with policy and guidance and will provide a wide range of planning and public benefits, including, but not limited to the following:

- Delivery of 116 residential dwellings of which 43% will be family sized units in line with the demand within the Borough, which will contribute to the Borough's much needed housing supply;
- 50% affordable housing by unit (40% by habitable room) will be provided on Site of which 47 will be affordable for rent and 11 will be shared ownership;

- 175 sqm of flexible, affordable commercial floorspace will be provided at 50% of market rent to meet local need;
- The proposals will result in the redevelopment of a vacant brownfield Site which currently comprises outdated 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 reducing the quantum of unneighbourly industrial uses;
- Significant highways and safety improvement will be achieved by reducing 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.
- Creation a new street scene and improved visual appearance of the Site.

1.7 Overall, the scheme will deliver a wide range of economic, social and environmental benefits and represents the sustainable redevelopment of the Site.

2. SITE CONTEXT

The Site

- 2.1. The existing Site comprises the former Greggs Bakery Site in Twickenham and no.2 Gould Road, 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. Greggs Plc (“Greggs”) operated on the Site since 1994 and the existing use of the site is for industrial purposes (Use Class B2) including ancillary office floorspace associated with the bakery operations. Agents for Greggs advised that throughout the period of occupation, the Site proved problematic from an operational and asset management perspective. Due to the Sites positioning, the buildings gave rise to significant residential amenity complaints, resulting in the business beginning a search for alternative premises in the late 1990’s. The business operated from the Site unsatisfactorily and inefficiently, until 2018 when alternative, purpose-built premises, were identified in Enfield.
- 2.3. The site, now vacant comprises an area of 1.1 ha, with the majority of the Greggs Bakery Site 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. The existing buildings are in disrepair and have now reached the end of their life cycle. The application site also includes the vacant no. 2 Gould Road, a two-storey end of terrace house.

	Existing Floorspace
Residential (Private)	75sqm

Residential (Affordable)	0 sqm
Commercial	7,371 sqm
Sub-station	0 sqm
Total	7,446 sqm

- 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 the introduction of the 'West Twickenham CPZ' which came into force in May 2018.

Surrounding Area

- 2.5. The surrounding area is predominantly residential in character comprising rows of terraced streets. Crane Mews to the west comprises a converted industrial development, now mixed-use after limited commercial interest, now providing a number 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 due to limited commercial demand which have resulted in planning permission being granted for residential use and most recently received approval for 15 affordable residential units. Norcutt Road comprises mews type properties with small rear gardens with adjoin the Site. Craneford Way Depot to the north of the Site beyond the River Crane and railway line comprises a large underdeveloped recycling site.
- 2.6. The north of the Site is adjacent to the River Crane. The river and land beyond to the north of the Site is designated as Metropolitan Open Land (MOL). 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.

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 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.
- 3.3. 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.
- 3.4. 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.

Refused Planning Application – LPA Ref. 19/0646/FUL - 2019

- 3.5. An application was submitted in 2019 for the following description of development:

‘Demolition of existing buildings (with the retention of a single dwelling) and the redevelopment of the site to provide 116 no. residential units and 175 sqm commercial floorspace (Use Class B1) with associated hard and soft landscaping, car parking, highways works and other associated works’.

3.6. Specifically, the proposed development sought

- 116 residential units in a mix of:
 - 32 x 1 bed (28%)
 - 34 x 2 bed (29%)
 - 46 x 3 bed (40%)
 - 4 x 4 bed (3%)

- 46 affordable dwellings (40% by unit)

- Building heights of 2 – 5 storeys which greater massing concentrated to the north of the site.

- Car parking provision on site including 100 residential spaces, 1 commercial and 1 public on street car club parking space.

- 228 cycle parking spaces

3.7. The scheme received strong public support from those living within the immediate area and received positive feedback from Ward Councillors during the consultation period particularly in terms of the loss of industrial floorspace on the Site and provision of much needed residential dwellings.

3.8. Despite the above, the application was refused on 5th August 2020, with two reasons for refusal:

- (1) Reduction in loss of industrial floorspace at a site designated as Locally Important Industrial Land and Business Park

- (2) Lack of binding obligation to secure early and late stage reviews relating to affordable housing provision.

3.9. Officers did however support all other aspects of the scheme including:

- Provision of residential units on the site as part of a mixed use scheme.

- General approach to design, with Officer's highlighting the visual improvements as a result of the proposed scheme.
- Proposed height, density and massing including the provision of a 5 storey building on site.
- Enhancements in relation to energy efficiency as well as planning and habitat enhancements proposed along River Crane.
- Standard of residential accommodation and amenity space.
- Impact on amenity to surrounding properties in terms of daylight/sunlight and overlooking
- Acceptable parking provision and no adverse highways impact.

3.10. It was regarded that the second reason for refusal, regarding the lack of binding obligation relating to early and late stage reviews could be secured under a S106 and that the fundamental reason for refusal was based upon policy grounds relating to the loss of industrial floorspace on Site.

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 LB Richmond 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. Extensive pre-application meetings were undertaken with the Council as part of the initial development of the scheme under the refused planning application (LPA Ref. 19/0646/FUL). An initial pre-application meeting was held with the London Borough of Richmond on 12th September 2017 (feedback received January 2018). The proposals at that time comprised 118 new dwellings on the Site. 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. Feedback from these meetings was taken into account within the refused application and continue to be acknowledged as part of the current scheme.
- 4.6. Since the refused application a further pre-application meeting with LB Richmond was undertaken in June 2022 to discuss the amended proposals which sought to increase the level of affordable housing provision to 50%.
- Loss of industrial would be resisted from a policy perspective but highways concerns limiting the amount of industrial on site could be taken into consideration if fully justified and evidenced.
 - Offer of more affordable housing was welcomes but was unlikely to swing the planning balance in favour of the scheme. The Housing Team requested further information regarding the deliverability of the affordable housing and that the affordable offer had been maximised.
 - Requested further information on transport impacts, including parking, separation distances between pedestrian and cyclists and appropriate visibility.
 - Acknowledged the existing lawful use of the Site being B2 industrial and that this can form the baseline when assessing any environmental or amenity changes and improvements.
 - Confirmed that there were no objections to the design of the scheme.
- 4.7. Throughout the pre-application process, the Applicant has sought to work collaboratively with the Council. Following each meeting and as part of the evolution of the proposed development, the Applicant has made a number of design and land use quantum amendments to respond to feedback that has been provided by Officers at the Council on the key site issues.

- 4.8. The previously refused scheme was also taken to Design Review Panel in May 2019 with a mixture of professional on the panel with Planning Officers and Ward Councillors in attendance. The panel were generally aligned in their comments and responses noting that the Site represented an ideal opportunity for providing new housing in the Borough and supported the idea of the residential street reflecting the surrounding context. The panel were supportive of the proposed height and massing, in addition to the public realm concept.

Stakeholder Consultation

- 4.9. A meeting was held with ward and neighbouring members in January 2019 and again in March 2022 to discuss the proposals. This is in addition to a meeting with Munira Wilson MP for Twickenham in March 2022. Positive feedback regarding provision of residential units was received from both meetings and full details of those meetings are included within the Statement of Community Involvement.

Public Consultation

- 4.10. A public exhibition was held in March 2022 where a questionnaire was provided along with freepost envelopes for attendees to return their comments. An online version of the questionnaire was also published on the project website.
- 4.11. As of 7th April 2022, 35 feedback forms had been received. Full details of the feedback can be found within the Statement of Community Involvement and demonstrate that the preference from local residents is for a residential-led scheme on the Site due to highways impact and greater need for housing.

5. APPLICATION PROPOSALS

Description of Development

- 5.1. This section outlines the proposed development for the Site. The planning application seeks planning permission for the following description of development:
- 5.2. *'Demolition of existing buildings (with retention of a single dwelling) and redevelopment of the site to provide up to 116 residential units and 175 sqm commercial floorspace (Use Class E) with associated hard and soft landscaping, car parking and highways works and other associated works'*
- 5.3. The over-arching objective of the proposals is to regenerate this strategically important site through the demolition of the existing poor quality buildings and to replace these with a highly sustainable mixed-use development which acknowledges and responds to its residential context. The proposed development has the opportunity to deliver a wide range of planning benefits as detailed within this Statement.

Employment Use

- 5.4. It is proposed to provide 175 sqm of affordable workspace (Use Class E). The floorspace has been designed to be subdivided or open plan in order to create flexible accommodation. The affordable workspace will be offered 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.

Residential Use

- 5.5. The proposed development will provide 116 residential units. This includes a total of 58 affordable homes equating to 50% by unit and 40% by habitable rooms. In terms of tenure these will comprise a mix of shared ownership and affordable rented units, of which 50 will be family sized units.

	Residential Type	Number of bedrooms per unit					Total Habitable Rooms
		1 bed	2 bed	3 bed	4 bed	Total	
Existing			1			1	4
Proposed	Affordable Rent	23	17	7		47	126
	Shared Ownership	6	5	0	0	11	27
	Private / Market	4	11	39	4	234	126
	Total	33	33	46	4	116	387

Built Form

- 5.6. 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.
- 5.7. The commercial building and houses that front Edwin Road have been deliberately kept lower to ensure they fit within the street scene. The commercial building is two storeys with a pitched roof, the residential gable end is two storeys with a typical pitched roof and dormer window. This reduces the massing further than the mansard roof used elsewhere.
- 5.8. Entering the site from Edwin Road towards the river, the buildings rise up in scale from two storeys to five storeys. As you move along the river and exit the site onto Crane Road the buildings go back down in scale from five storeys to one storey. The building footprints are larger adjacent to the river, matching their neighbours and the typical urban grain as you approach the river. These

buildings have been broken up into smaller forms through the use of varied materiality and roofscapes helping to embed the buildings into the existing townscape.

Amenity Space and Public Realm

- 5.9. 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.
- 5.10. 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.

Transport

Car parking

- 5.11. 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.
- 5.12. A total of 101 car parking spaces will be provided across the Site of which 10 will be accessible. 100 of these car parking spaces will be allocated for residential use, with 1 allocated for the commercial element. 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.
- 5.13. 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.

Cycle Parking

- 5.14. A total of 216 residential 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. The commercial element of the scheme will provide 2 long stay and 2 short stay commercial spaces

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.
- 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 (2021);
 - The London Borough of Richmond upon Thames Local Plan (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 Framework (NPPF) (2021)
 - National Planning Policy Guidance (NPPG)
 - London Borough of Richmond upon Thames Supplementary Planning Document (SPD) (March 2014)
 - London Borough of Richmond upon Thames Supplementary Planning Guidance.
- 6.5. LB Richmond are currently preparing a new Local Plan which will replace the current Local Plan and the Twickenham Area Action Plan. Consultation on the Pre-Publication Local Plan ran from December 2021 – January 2022. It is understood that the next version of the draft Plan will be taken to the Council's Environment, Sustainability, Culture and Sports Committee in November 2022 to seek approval to proceed to the final statutory consultation on the Plan. It

is understood that examination of the Draft Local Plan is intended to occur between Spring 2023 – Spring 2024 with an adoption targeted for Autumn 2024. Given the early stages of the development of a new Local Plan, the initial policies and strategic aims within the Pre-Publication Local Plan carry very limited weight at the time of submitting this planning application.

Site Designations

6.6. The site is subject to the following site-specific planning policy designations as identified by the Council's adopted Proposals Map (July 2019):

- Archaeological Priority Area;
- Key Office Area – West Twickenham Cluster;
- Locally Important Industrial Land and Business Park – West Twickenham Cluster (including Greggs Bakery and surroundings)

2.7. 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.

2.8. The Site is located outside of, but in close proximity to Hamilton Road Conservation Area (located to the east of the site) and Twickenham Green Conservation Area (located to the south of the site).

7. PLANNING POLICY ASSESSMENT

- 7.1. The following sections provides an assessment of the key planning issues in relation to the proposed development against the relevant adopted planning policies.

Principle of Development

Industrial Floorspace

- 7.2. NPPF (2021) paragraph 8 states that the economic objective of the Framework is to *'help build a strong, responsive and competitive economy, but ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure'*.
- 7.3. This is reiterated by London Plan (2021) Policy GG5 which seeks to conserve and enhance London's global economic competitiveness. It seeks to do this by requiring boroughs to plan for sufficient employment and industrial space in the right locations to support economic development but also to ensure that sufficient high quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth.
- 7.4. At a local level, there are two key policies within the LB Richmond Local Plan which relate to sites in employment use and specifically industrial use.
- 7.5. Local Plan Policy LP40 sets out the Council's approach to all employment floorspace and notes that the Council will support a diverse and strong local economy in line with the following principles:
1. *Land in employment use should be retained in employment use for business, industrial or storage purposes.*

2. *Major new employment development should be directed towards Richmond and Twickenham centres. Other employment floorspace of an appropriate scale may be located elsewhere.*
 3. *The provision of small units, affordable units and flexible workspace such as co-working is encouraged.*
 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 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 neighbouring sites.*
- 7.6. Local Plan Policy LP42 sets out the Council's approach to industrial land and specifically locally important industrial land and business parks. In these areas:
- a. *Loss of industrial floorspace will be resisted unless appropriate replacement floorspace is provided;*
 - b. *Development of new industrial floorspace and improvement and expansion of existing premises is encouraged;*
 - c. *Proposals for non-industrial uses will be resisted where the introduction of such uses would impact unacceptably on industrial activities.*
- 7.7. Given the nature of the Site as locally important industrial land, this statement assesses the proposed scheme firstly against Local Plan Policy LP42 before reviewing the proposals against LP40.

Local Plan Policy LP42 (Industrial Land and Business Parks)

LP42 (a)

- 7.8. Local Plan Policy LP42 (a) notes that the loss of industrial floorspace will be resisted within designated locally important industrial land in the first instance.

- 7.9. The proposed scheme seeks the redevelopment of the site removing the existing industrial uses to provide 175 sqm of affordable workspace. The proposed scheme would therefore result in an overall employment floorspace loss of 7,271 sqm.
- 7.10. The supporting text to Policy LP42 notes that *'any loss of industrial space will only be permitted if the applicant can demonstrate that there is no demand for such space and that there is not likely to be in the foreseeable future'*. To demonstrate this, any application must *'include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing use or an alternative industrial or other such employment use completed over a minimum period of two continuous years'*.
- 7.11. It is also worth noting that Policy LP42 was based upon the Mayor of London's Land for Industry and Transport SPG (2011) that states that the Council should ensure a 'restrictive' approach towards the transfer of industrial land to other uses until 2031. Since the Local Plan was adopted, the London Plan has been updated. Prior to the adoption of the London Plan (2021) the Secretary of State ('SoS') required that Policy E4 was modified to remove the requirement for 'no net loss' of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. It was identified by the SoS that the previous aspiration to 'retain' sufficient industrial capacity 'may not be realistic' and is inconsistent with the NPPF which importantly requires *"that sufficient land of the right type is available in the right places and at the right time to support growth and innovation."* The 'no net loss approach' was therefore removed from the adopted London Plan Policy E4.
- 7.12. Acknowledging the above, it is considered that there are two key points to be assessed when deciding on the appropriateness to retain industrial floorspace on a site:
1. Whether the site is of the right type and in the right place to be retained as industrial floorspace.

2. Whether there is adequate demand for the existing and future industrial floorspace.

7.13. We address these two elements in turn below.

Appropriateness of the site

7.14. 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 which is where HGV's previously accessed 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. The surrounding area to the Site is predominantly residential in character, comprising rows of narrow terraced streets.

7.15. Any employment designation in the borough serves less of a strategic role than Strategic Industrial Land and, in accordance with the London Plan, should '*be fit for purpose*', located in sustainable locations and, for industrial uses, be '*accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport*'. We argue that Greggs meets none of this criteria – being in a residential area with low footfall, with a PTAL rating of 2, located far from the strategic road network and being in an existing condition where full redevelopment and by associated high capital costs are required for any use (affecting the viability of any sole employment scheme).

7.16. As previously mentioned, the previous occupier Greggs operated on the Site since 1994 (Use Class B2). During the period of occupation, the Site proved to be problematic from an operational and asset management perspective. The accompanying Market Demand Report prepared by Milestone documents that the decision to close production at Twickenham was not due to wider issues for the company, but instead occurred due to limitations of the Site. It is understood that the Site could not operate in the location with modern day delivery demands and logistics. A key factor in their search for alternative premises were the significant constraints associated with the Site given its

residential context, these primarily relate to highways impacts as a result of the number of HGV movements associated with the industrial land use, in addition to noise and wider amenity impacts on surrounding residents.

Noise impacts

- 7.17. Whilst the Site has not been operated as a bakery for a number of years, resident complaints and planning consultation feedback and applications comments indicate historically issues with regards to noise levels of the previous industrial use.
- 7.18. Planning history for the site also evidences the struggles with amenity issues even prior to Greggs occupation with the approved planning application (LPA Ref. 85/1756) for the erection of noise baffle sidewalls sheeting and roof.

Highways constraints

- 7.19. A Transport Assessment prepared by Velocity accompanies this application and summarises the highways concerns arising from the previous use as a bakery and the implications of any future replacement industrial floorspace on the Site.
- 7.20. The Transport Assessment notes that whilst the Site was operational as a bakery, the Site generated a moderate number of regular daily HGV movements, with instances of conflict where large vehicles were passing other vehicles. Anecdotal evidence from residents and documented in local newspapers identifies some of the damage to property and the infrastructure that occurred as a result of too many HGV's using the roads, notably:
- Damaged footways and kerbs;
 - Concerns about safety for other road users and pedestrians;
 - Local complaints of noise and poor air quality arising from vehicles; and
 - Damage to parked cars

- 7.21. Velocity note that due to the Site's residential setting, the adjoining network of road does not lend themselves to moderate-volume HGV movements. Access to the Site from Medway Road / Andover Road to the west is also signposted as being unsuitable for HGV's. Carriageways are in parts narrow and often flanked by parked cars. Photographic evidence contained within the Transport Assessment suggests Greggs HGVs frequently had to mount the footways particularly along Marsh Farm Road and reverse to allow other vehicles to pass, putting the safety of other road users, especially pedestrians and cyclists, at significant daily risk. Due to the restricted nature of the Site, Velocity have concluded that it would be very difficult to improve or widen the roads and junctions and therefore the existing constrained routes are the only access options for HGVs to the Site and the historic issues cannot be mitigated.
- 7.22. In September 2021 and since the 2019 application (LPA Ref. 19/0646/FUL) was refused the School Street scheme along Colne Road has been introduced. This has led to more vehicles accessing Edwin Road during the closure times (08:20-09:00 and 15:30-16:15 during school periods).
- 7.23. The LB Richmond Employment Sites and Premises Study (2017) acknowledged the inherent issues of the site notably:
- *'The Site is bounded by residential uses. Crane Road is primarily a residential road which means that operating hours, types of industrial activity and access are constrained. The current use experiences issues with HGV access'*
 - *'Greggs bakery may be available for redevelopment within the short term. Mixed use redevelopment a likely probability. Intensification and extension of the cluster may be difficult given the proximity of residential uses and the constrained access. Unlikely to support general industry, but hybrid space may be better suited'*

- *‘The site is hemmed in by residential uses which restricts the extent to which the sites can be redevelopment and intensified. Access to the cluster is also constrained (especially at Greggs Bakery) and is unlikely to significantly improve given the surrounding residential uses’*

7.24. Given the above, it can be concluded that for highways safety reasoning that the Site is not suitable for solely industrial floorspace given the number of HGV conflicts which would likely return to the surrounding streets. The proposed scheme therefore provides opportunities to rectify historic conflicts with the longstanding industrial use through providing much needed residential homes more appropriate to the Site.

Adequate demand for existing and future industrial floorspace

7.25. LB Richmond Local Plan Appendix 5 sets out the details that should be provided to enable officers to assess the acceptability or otherwise of marketing evidence. Appendix 5 notes that marketing should always involve a robust and active marketing campaign and should:

- Be ongoing for a minimum period of two continuous years
- Be through a commercial agent
- Be marketed on property databases, search engines and other relevant websites which focus on the sale or letting of commercial premises, which are free to view and easily accessible by prospective purchasers / tenants.

7.26. 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 and is ongoing, thereby providing a marketing period of around 4.5 years at the date of this submission.

7.27. The marketing report demonstrates that to date no meaningful offers have been received for the Site due to the severe site restrictions. A summary of the

interest expressed in the Site is set out as part of the marketing report which covers both industrial, commercial and speculative residential developer interest. Whilst there has been initial interest in the Site, no offers have been received. When queried as to why, the reasons were identified as:

- The size and configuration of the existing buildings which are not fit for use;
- The small yard and insufficient car parking area;
- The arrangement of the units within the loading bay area
- Concerns regarding 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.

7.28. The Site was therefore concerned not to be suitable by any of the operators and whilst there has been interest for longer term redevelopment of the Site for residential, commercial occupiers are deterred by the evident Site constraints.

7.29. A Demand Report prepared by Milestone also accompanies the application and assesses the existing local market in relation to demand for future employment use. The report acknowledges that there has been a major shift in focus towards investment in purpose-built distribution hubs in West London with investment portfolios moving away from retail and office space, towards industrial land, particularly those sites which can cater for last mile logistics. The report does however note the specific needs of these uses, including 24/7 dispatches and 10-minute window for scooter deliveries. As such, units taken by last-mile delivery have been in pre-existing light-industrial estates outside of residential areas, given the need to avoid restrictions in deliveries.

- 7.30. In terms of existing local workspace, the report notes that smaller industrial units are located nearby to the Site but these sites are unencumbered by adjoining residential housing and thereby not affected in the same way by the Sites residential context. The report highlights nearby Crane Mews buildings, converted from industrial to office in 2008, but which has now seen many of the units converted to residential homes. The report notes that two further units are now on the market, with one instruction dating from 2018 and two further units for sale as of March 2022.
- 7.31. The Demand Report notes that the site could only achieve scale production if all limitation on the site in terms of operating hours, noise and vehicle movements were disregarded in detriment to the impact of the residential neighbours. Milestone note that in redeveloping the Site, any constraints on delivery and distribution to limit vehicle movement or amenity impacts to residents would deter occupiers in the sector.
- 7.32. The report concludes that they would *'not be confident in securing a meaningful letting in this location...[and] the developer runs the risk of building void space solely to meet local policy'*.
- 7.33. Based upon the above analysis it can therefore be concluded that there is insufficient existing or future demand to justify the retention of industrial floorspace on the Site and therefore meets Policy LP42 supporting text requirements for the loss of industrial floorspace.

Sequential Test

- 7.34. LB Richmond Policy LP42 supporting text notes, that where the Council is satisfied that a full and proper marketing exercise has been undertaken and that there is no demand for continued industrial use on site, then redevelopment or change of use away from industrial use may be appropriate provided the sequential approach to redevelopment is adhered to.
- 7.35. Policy LP42 supporting text provides a two step sequential approach as follows:

The first step in the sequential test is consideration of alternative employment generating uses. These uses should include in the first instance B Use Classes such as offices and if these are not practicable then social infrastructure and community uses such as health clinics, nurseries and creches, leisure facilities or other uses identified for community purposes.

The second step in the sequential test is for mixed use development including other employment generating or community uses. Proposals for mixed use schemes should maintain or improve the amount of employment floorspace on site.

- 7.36. The above is in line with London Plan Policy E7 which requires LPAs to identify opportunities for industrial ‘intensification, co-location and substitution’ based on a robust evidence base and assessment of each site’s suitability for continued industrial use, including the introduction of other uses if ‘*there is no reasonable prospect of the site being used for the industrial and related purposes*’.

(1) Alternative employment generating uses

Office Use

- 7.37. Local Plan Policy LP41 (Offices) notes 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 co-working is encouraged.*
 5. *The Council will require the provision of affordable office space within all major developments with over 1,000 sqm of office space; this will be secured through Planning Obligations.*
- 7.38. The Demand Report prepared by Milestone notes that the predicted return to normal working practices following the 2020 Coronavirus Pandemic has not materialised. Whilst there is some evidence of a drift back to workplaces, this is mainly concentrated in central London. It is in Milestone's experience that owners or occupiers should expect to see 2 or 3 key staff in situ where there would normally be 20.
- 7.39. The Greggs Site is not located within one of the main borough centres and is positioned within a low PTAL location. Whilst within a Key Office Area, the accompanying Demand Report notes that any commercial scheme on the Site would be hampered by the Sites difficult location for employment commuting '*being hampered by a complete lack of business parking on the CPZ covering the working day*'. The report notes that companies regularly report difficulty in attracting key staff if there is a complicated commute and parking issues to contend with.
- 7.40. It is acknowledged that whilst HGV trips would be reduced compared to an industrial scheme on site, an office development would generate significantly more car trips than industrial uses which are associated with employees and visitors, particularly on account of the Sites modest PTAL rating. As such, the accompanying Transport Assessment notes that highways impacts could be caused by congestion and overspill parking issues rather than HGV conflicts.
- 7.41. Milestone conclude that '*the purchase of this Site for redevelopment as offices in a market with falling rents, reduced lease terms (and the quality of covenant therein) to provide a meaningful return on investment would be high risk*' and that Twickenham is better served by transport links when compared to other

town centres in the borough yet the town continues to suffer from widespread and prolonged vacancies for office space. Milestone note that there is currently no demand for out of town tertiary Class E(g)(i) uses where the preference remains for transport links in High Street and local trade hubs.

7.42. This conclusion is also evidenced in the redevelopment of surrounding sites. Norcutt House and Lockcorp House, previously in industrial use, were granted approval for the conversion of the site for residential accommodation with Class B1 Office Floorspace in November 2003 (LPA Ref. 03/2570/FUL). This application was never implemented and further application was approved in January 2009 for the redevelopment of the site for residential accommodation with single office block (LPA Ref. 06/2018/FUL). This application was implemented save for the commercial element on the site of Lockcorp House. The office block was deemed commercially unviable due to the site constraints and lack of demand for office in this location.

7.43. 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)”, 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”*.

7.44. 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 did not

consider this adjacent site to be appropriate for commercial uses given the residential location despite being located within a Key Office Area.

- 7.45. 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.
- 7.46. Given the above, it can be concluded that proposals for an office-led scheme on the Site would not be appropriate for the Site and fail to meet Local Plan Policy LP41 locational and demand requirements. The Applicant has however looked to include an element of affordable workspace (117 sqm) into the scheme in line with Officer recommendations despite the Demand Report conclusions.
- 7.47. The supporting text notes that where an office use is deemed inappropriate, then proposals should look to the provision of social and community floorspace on the site.

Social and Community Uses

- 7.48. Local Plan Policy LP28 relates to the delivery of new social and community infrastructure and notes that proposals for these land uses will be supported where:
1. *It provides an identified need;*
 2. *It is of high quality and inclusive design providing access for all; and*
 3. *Where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access.*
- 7.49. The Infrastructure Delivery Plan (2017) (IDP) provides the most up to date summary of the Boroughs current infrastructure shortfalls and future needs

and demands for the borough to support new development and growing population.

- 7.50. The IDP notes that there is a medium/ long-term need for additional primary school capacity, with the possibility of requiring a new school site. In terms of library uses, the IDP notes that the expansion of existing libraries as a priority and co-location with other public services.
- 7.51. In terms of healthcare provision, it is noted that there will be demand for additional capacity to support new housing development in the short, medium and long term and to support the maximisation of current GP practices whilst also relocating current facilities to less cramped and purpose built practices.
- 7.52. The remainder of the infrastructure demands highlighted within the IDP relate to uses inappropriate for the site, such as sports facilities and are therefore not considered as part of this application.
- 7.53. As noted above, the Site is not located within one of the main borough centres and positioned within a low PTAL location with limited public transport access. As such, any users of the community facilities would likely travel to the Site via car. Given the constrained site, surrounding residential streets and CPZ in place it is considered that any of the above uses would lead to significantly more car trips leading to congestion and overspill parking issues. The introduction of the School Street scheme along Colne Road in September 2021 further demonstrates the existing pressure on surrounding streets as a result of a school in close proximity to the Site.
- 7.54. It can therefore be concluded that social infrastructure and community uses on the Site would not be appropriate due to the Sites position with poor access to public transport and existing highways constraints around the Site.

(2) Mixed-use development

- 7.55. The above analysis has demonstrated the inappropriateness from a site characteristic and demand perspective for an entirely commercial or

community scheme on the Site. The Applicant has taken into account NPPF (2021) paragraph 122 which notes that planning policies and decisions need to reflect changes in the demand for land and that 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. As described in further detail later in this Statement, the Applicant has acknowledged the lack of demand for employment floorspace in this location and has sought to provide a residential-led, mixed-use development on site which can provide significant contribute to an unmet affordable housing need within the Borough. This will be combined with an element of affordable workspace which can continue to provide the opportunity for economic benefits whilst also reflecting limited demand for employment floorspace in this location.

LP42 (b)

- 7.56. LB Local Plan Policy LP42(b) supports the development of new industrial floorspace and improvement and expansion of existing premises.
- 7.57. As detailed above, the expansion of premises is restricted on the Site for highways, amenity and demand reasons. The provision of 175sqm of affordable workspace however will provide a more appropriate employment floorspace offering, whilst also allowing the replacement of existing poor quality buildings with a fit-for-purpose workspace unit.

LP42 (c)

- 7.58. LB Local Plan Policy LP42 (c) states that proposals for non-industrial uses will be restricted where the introduction of such uses would impact unacceptably on industrial activities.
- 7.59. The accompanying acoustic, air quality and transport assessments demonstrate that any additional amenity implications will be reduced by the proposed scheme and/or mitigated against where required. As such, the

existing industrial units will not be hindered by the addition of further residential in the area.

Local Plan Policy LP40 (Employment and Local Economy)

7.60. Local Plan Policy LP40 sets out the Council's approach to all employment floorspace and notes that the Council will support a diverse and strong local economy in line with the following principles:

1. *Land in employment use should be retained in employment use for business, industrial or storage purposes.*
2. *Major new employment development should be directed towards Richmond and Twickenham centres. Other employment floorspace of an appropriate scale may be located elsewhere.*
3. *The provision of small units, affordable units and flexible workspace such as co-working is encouraged.*
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 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 neighbouring sites.*

7.61. Many of these policy requirements have been explored as part of the above Local Plan Policy LP42 analysis, however conclusions and assessment against Local Plan Policy LP40 are included for completeness.

(1) Land in employment use to be retained

7.62. As noted earlier in this statement, due to inherent Site conditions and resultant implications in terms of highways and amenity impacts it is not deemed appropriate to retain all industrial floorspace on the Site. Demand analysis also

notes of limited demand both for industrial and other office and community uses on the Site. The proposed scheme seeks to provide 175sqm of affordable workspace, delivering a workspace unit appropriate to the residential location whilst also providing employment benefits to the Borough.

(2) New employment development to be directed towards Richmond and Twickenham Centre.

7.63. The proposed development lies outside of the Richmond and Twickenham Centres, further demonstrating that major employment provision on this Site, in a residential and low PTAL location is not deemed appropriate. The proposed development looks to reduce the amount of employment floorspace on the Site to a level which is appropriate to the Sites characteristics and constraints as detailed earlier in this statement.

(3) The provision of small units, affordable units and flexible workspace encouraged

7.64. The scheme looks to provide 117sqm of affordable workspace.

(4) Mixed use development proposals to retain and where possible, enhance the level of existing floorspace. Inclusion of residential within mixed-use schemes to not adversely impact on the continued operation of other established employment uses

7.65. As detailed above, due to inherent Site conditions and resultant implications in terms of highways and amenity impacts it is not deemed appropriate to retain all industrial floorspace on the Site. The provision of 117sqm of affordable workspace is demonstrated within this statement to not adversely impact the operation of those employment uses which currently exist in the immediate area.

7.66. It can therefore be concluded based upon the above and further information contained within this statement that the proposals provide an appropriate level of employment floorspace, which reflect the character and context of the

Site, in addition to the demand for employment floorspace documented within longstanding marketing exercises. It has therefore been demonstrated that the proposals provide the right type of land in the right places, in accordance with NPPF (2021) paragraphs 8 and 122.

Residential Provision

- 7.67. The NPPF (2021) contains a clear message throughout to make more land available for housing and the document highlights the need for a flexible approach to be taken to reflect such changes in the demand for land. NPPF (2021) paragraph 122 notes that planning policies and decisions need to reflect changes in the demand for land and that, prior to updating the plan, applications for alternative uses on land should be supported where the proposed use would contribute to meeting an unmet need for development in the area. It has been identified at all levels and particularly in the South East and London, that the provision of housing must be a priority to overcome the current shortage of accommodation.
- 7.68. London Plan (2021) Good Growth principle GG4 identifies an underlying principle to encourage additional housing at appropriate locations and to reuse brownfield sites to deliver homes.
- 7.69. Local Plan Policy LP34 (New Housing) sets out the Borough's housing target of 3,150 homes for the period 2015-2025. This target is below the more recent London Plan (2021) target of 410 units per annum between 2019/20 – 2028/29.
- 7.70. It is noted that the Borough is on course to meet and exceed the strategic dwelling requirement over a ten-year period. However, the Council's latest Annual Monitoring Report (AMR) 2019-2020 identifies that in the period, only 331 new homes were delivered, which falls short of the 410-target set by the London Plan. Moreover, the Council's Local Housing Needs Assessment (stage 1) (July 2021) shows that meeting the target of 411 homes per annum would generate a shortfall against local need.

- 7.71. Local Plan Policy LP36 (Affordable Housing) requires 50% of all housing units to be affordable.
- 7.72. The AMR (2019/2020) sets out that only 34 new affordable units were delivered in 2019/2020 across the whole Borough. The Assessment acknowledges that the Borough has a potential scale of need for 1,123 rented affordable and 552 shared ownership homes per annum.
- 7.73. It can therefore be concluded that since the adoption of the LB Richmond Local Plan, that the need for residential dwellings has continued to increase and secondly, that deliver rates have demonstrated a recent undersupply of homes, both private and affordable and that this is benchmarked against a target which does not represent need in the Borough.
- 7.74. Recent planning appeals have shown that demand for housing within the Borough can be given greater priority over the restriction to retain employment land uses in areas deemed inappropriate for continued use. This is evidenced in the approved permission for Lockcorp House (LPA Ref. 17/1033/FUL) which was granted via appeal in May 2018 to deliver student housing (as further described earlier in this statement). The Inspector to this appeal noted 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 HO5 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”.*
- 7.75. As demonstrated earlier in this statement, the Site is not regarded as appropriate for the retention of solely industrial or employment use, nor is there a demand for social/community uses. Given the demand for housing both within the Borough and recent delivery rates it is considered that the

need for residential development in this location outweighs the need to retain an employment use on the Site.

7.76. The proposed development therefore seeks to deliver 116 residential dwellings, comprising a mix of apartments and family-sized dwellings as demonstrated within the following table:

	Residential Type	Number of bedrooms per unit					Total Habitable Rooms
		1 bed	2 bed	3 bed	4 bed	Total	
Existing			1			1	4
Proposed	Affordable Rent	23	17	7		47	126
	Shared Ownership	6	5	0	0	11	27
	Private / Market	4	11	39	4	234	126
	Total	33	33	46	4	116	387

7.77. The proposals will deliver a mix of units within apartments and dwelling houses comprising one, two, three and four bedroom units. A total of 50 of these units will be family-sized homes (43%), 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 location.

7.78. The proposals will deliver a total of 50% affordable housing by unit on Site which accords with Local Plan policy LP36 which requires the delivery for 50% of all housing units to be affordable. These comprise a mix of intermediate and affordable rented housing to address a broad sector of housing need in the Borough, including the delivery of much needed family housing with private gardens, alongside smaller units for first time buyers.

7.79. There is clear justification and significant benefits in the redevelopment of the part of the Site for residential accommodation which is appropriate within the surrounding residential context and can provide a significant number of affordable homes. 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 requirement to deliver a significant level of new homes specifically within West Twickenham. This would also considerably reduce the Council's reliance on limited small housing sites, which typically result in fewer affordable new homes and can often also become unviable due to other competing planning policy requirements.

Design and Townscape

7.80. High quality sustainable design is engrained in policy at all levels, including the NPPF, London Plan and Council's adopted planning policy. Paragraph 134 of the NPPF (2021) states that permission should be refused for development of poor design that fails to take the opportunities for improving the character and quality of an area and the way it functions. Paragraph 190 of the NPPF also states that in determining planning application, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of the heritage assets and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including economic vitality; and
- The desirability of new development making a positive contribution to local character and distinctiveness

7.81. The London Plan (2021) seeks to create successful, sustainable mixed-use places that make the best use of land. To achieve that, Policy GG2 of the Plan

seeks a design-led approach for development to determine the optimum development capacity of sites taking into account site context and capacity for growth. The London Plan (2021) Policy D3 highlights that development which show a clear understanding of, and relationship with the distinctive features of a place are more likely to be successful. London Plan Policy D9 states that Development Plans should define what is considered a tall building for specific localities based upon local context and should not be less than 6 storeys or 18m.

7.82. At a local level, 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.

7.83. 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.

- 7.84. The Design and Access Statement which accompanies this submission explains the design vision and rationale behind the proposals and the accompanying 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.
- 7.85. 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.
- 7.86. The site is in a mainly low-rise residential area, and therefore the proposals are mindful of this surrounding context. The general approach taken has been to keep the houses at a similar scale to their immediate neighbours, achieved by providing accommodation within the mansard roof of the houses and within the lantern roof of apartment building F.
- 7.87. The office building and house type that fronts Edwin Road have been deliberately kept lower to ensure they fit within the street scene. The commercial building is two storeys with a pitched roof, the residential gable end is two storeys with a typical pitched roof and dormer window. This reduces the massing further than the mansard roof used elsewhere.
- 7.88. Entering the site from Edwin Road towards the river, the buildings rise up in scale from two storeys to five storeys (remaining below the London Plan (2021) minimum height for tall buildings. As you move along the river and exit the site onto Crane Road the buildings go back down in scale from five storeys to one storey. The building footprints are larger adjacent to the river, matching their neighbours and the typical urban grain as you approach the river. These buildings have been broken up into smaller forms through the use of varied materiality and roofscapes helping to embed the buildings into the existing townscape.

- 7.89. The majority of the dwellings are in buildings of three storeys and below. The tallest building is similar to the recently approved affordable housing (19/2789/ FUL) immediately to the east of the site and remains below the London Plan (2021) minimum height for tall buildings. This taller massing has been positioned away from boundaries in a location which has the least impact on surrounding properties whilst adding interest and variety to the roofscape when viewed from more distant locations.
- 7.90. The proposals also comprise the retention and internal refurbishment of an existing property within the demise of the Site on Gould Road.
- 7.91. 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.
- 7.92. 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.
- 7.93. It should be noted that the overarching scheme design does not fundamentally differ from that within the refused application in 2019 for the Site (LPA Ref. 19/0646/FUL) where Officers and Design Review Panel Members confirmed that the overall approach to design was supported and in fact resulted in visual enhancements to the Site. This was later reiterated by Officers as part of pre-application discussions in June 2022 where the current industrial approach was presented.

- 7.94. The Scheme Proposal will therefore make a positive contribution to the townscape and enhance the visual appearance of the local area in accordance with the NPPF, London Plan and Local policies.

Landscaping and Public Realm

- 7.95. 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.
- 7.96. 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.

Residential Quality

- 7.97. 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.
- 7.98. 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. The proposals also provide 10% of the units as wheelchair accessible, whilst the remaining homes are designed to be accessible and adaptable dwellings.
- 7.99. 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). 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. The apartments will all benefit from private balconies which will meet the minimum size requirements as identified under the GLA's 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.

- 7.100. 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).

Amenity

- 7.101. London Plan Policy 7.6 seeks to ensure that buildings do not cause unacceptable harm to the amenity of surrounding land. Local Plan Policy LP8 sets out that all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties.

Overlooking

- 7.102. 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.

7.103. 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.

7.104. The distances between properties offer a substantial improvement compared to the relationship with existing buildings on Site and are commensurate with the distances between buildings in the surrounding area. The proposals will therefore meet the aspirations of Policy LP8 and have had regard to LB Richmond 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

7.105. 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.

7.106. 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 and proposed industrial unit 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.

7.107. The proposed residential 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.

Noise

- 7.108. An Acoustic Report has been undertaken in order to assess the existing and proposed noise sources and implications on any proposed residential accommodation.
- 7.109. The Acoustic Report acknowledges that the site is currently subject to various noise sources, including aircraft overflight associated with arrivals and departures from London Heathrow, and the railway to the north of the site and local businesses.
- 7.110. The findings of the acoustic model indicate that building envelope acoustic performances can be maintained by suitably selected buildings constructions of the walls, roof, ventilation/overheating products and glazing systems.
- 7.111. Given the nature of the industrial uses in and around the Site in addition to the sites positioning under a flightpath, the amenity space noise level requirements cannot be guaranteed to be maintained across all amenity spaces throughout the day. It is however noted that the Site lies within an area predominantly comprising existing residential dwellings which typically include external amenity spaces that will be subject to similar noise levels to the amenity spaces of the Site. Noise guidelines acknowledge that values are not achievable in all circumstances where development might be desirable such as higher noise areas in urban centres and in these situations, development should be designed to achieve the lowest practicable levels in these external amenity spaces. Consideration has also been had to the screening effect of the building orientation on noise from the railway and surrounding roads and it can be concluded that these are as low as practically achievable and therefore in planning with guidance.

7.112. It should also be noted that the noise emissions associated with the proposals will be less than the previous operator of the site, Greggs and its associated bakery use. 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, whilst also providing an enhancement through the reduction in industrial floorspace on Site providing a positive impact on the existing noise environment in accordance with Policy LP8.

Transport and Highways

7.113. 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.

7.114. 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

5.15. A total of 101 car parking spaces will be provided across the Site of which 10 will be accessible. 100 of these car parking spaces will be allocated for residential use, with 1 allocated for the commercial element. A number of the residential 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.

7.115. The proposed residential parking equates to 0.86 parking spaces per dwelling compliant with the London Plan's requirement for an Outer London site with a PTAL of 2.

- 7.116. 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.
- 7.117. 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.
- 7.118. The trip generation analysis shows that the residential use of the Site will remove daily HGV trips associated to the Site in operation as the Greggs bakery. There would be no material impact to the highway and public transport network associated with the employment element of the scheme which is likely to be serviced by LGV vehicles only. As such the Proposed Development will have a beneficial effect on the local road network.
- 7.119. On this basis, the Transport Assessment confirms that the proposals will not lead to increases in traffic, will significantly reduce HGV trips and potential conflicts and will not impact upon parking in the surrounding area in accordance with Policy LP8 and LP44.

Cycle parking

- 7.120. 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.
- 7.121. A total of 216 long stay and 4 short stay spaces are proposed across the Site for the residential provision. 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.

7.122. The proposals include the provision of 2 long stay spaces and 2 short stay spaces for the employment element of the proposals which will be secure, weatherproof, conveniently located, well-lit and accessible within a sheltered store adjoining the office building.

Servicing

7.123. 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

7.124. 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).

7.125. 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

7.126. The London Plan (2021) required all major development to be net zero-carbon with a minimum on-site reduction of at least 35% beyond Building Regulations 2013. London Plan Policy S12 and GLA Energy Hierarchy 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; Be Seen.

- 7.127. 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.
- 7.128. Analysis shows that the development will meet Building Regulations compliance through energy efficient measures alone and then further reductions are achieved through use of air source heat pumps and PBV's to beat the 35% improvement target. The report confirms that overall the Site emissions provide a 71% improvement on combined building regulations L1 and L2 target emissions (for both residential and commercial buildings). 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.
- 7.129. 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).
- 7.130. 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

- 7.131. 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 whilst concluding that there are no undue constraints with respect to ecology to potential development on the Site.

7.132. The Proposed Development show a total net percentage change of 100% of habitat units, reflecting a loss of no habitat units and a gain of 2.09 habitat units therefore demonstrating a positive response to implementing the proposals. The report also notes that the planting of new native species rich hedgerows would generate 0.04 units a 100% net gain in hedgerow units. The proposals therefore significantly exceed the aspirations 10% change for habitat and hedgerow units. The proposals will therefore accord with Local Plan Policy LP15.

Flood Risk

7.133. 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.

7.134. 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.

7.135. 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. No buildings are proposed in the Zone 2 area and the design caters for an offset which would represent betterment over the existing situation. It is considered that the information

contained within this report satisfies the requirements of the NPPF and Local Policy.

Air Quality

- 7.136. Local Plan Policy LP10 (Local Environmental Impacts, Pollution and Land Contamination) promotes good air quality and new technologies.
- 7.137. An Air Quality Assessment (AQA) 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.
- 7.138. In summary, the AQA sets out that the air quality conditions for future residents of the proposed development have been shown to be acceptable, with concentrations well below the air quality objectives throughout the site. The effects of emissions from locomotives on the adjacent rail line have been shown to be 'not significant'.
- 7.139. The AQA has demonstrated that pollutant concentrations will be well below the objectives at all existing receptors on the opening of the development, with or without the proposed development, and that the emissions from the traffic generated by the proposed development will have a negligible impact on air quality conditions at all existing receptors along the local road network.
- 7.140. The overall operational air quality effects of the proposed development are therefore judged to be 'not significant' and no mitigation is necessary to address any operational impacts.
- 7.141. It is however noted that the road traffic generation of the proposed development exceeds the air quality neutral benchmark derived for an average development in outer London, so mitigation will be required including minimisation of private car use and overall transport emissions.

7.142. Overall, the air quality is considered to improve as a result of the proposals which remove existing industrial emissions on the Site and as a result of a reduction in HGV movements.

8. CONCLUSIONS

- 8.1 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 lies vacant.
- 8.2 This Statement has demonstrated the inappropriateness of the Site for continued industrial use as a result of amenity concerns and highways safety issues. It has also demonstrated limited demand for industrial and other employment uses on the Site through an extensive marketing exercise which confirms a lack of demand as a result of the residential location of the Site. This Statement has shown that the Site is inappropriate to provide the social and community uses that LB Richmond have acknowledged as being in need within the Borough.
- 8.3 The NPPF (2021) contains a clear message throughout to make more land available for housing and the document highlights the need for a flexible approach to be taken to reflect such changes in the demand for land. NPPF (2021) paragraph 122 notes that planning policies and decisions need to reflect changes in the demand for land and that, prior to updating the plan, applications for alternative uses on land should be supported where the proposed use would contribute to meeting an unmet need for development in the area. It has been identified at all levels and particularly in the South East and London, that the provision of housing must be a priority to overcome the current shortage of accommodation.
- 8.4 Whilst it is acknowledged that the Borough is on course to meet and exceed the strategic dwelling requirement over a ten-year period, the Council's latest Annual Monitoring Report (AMR) 2019-2020 identifies that in the period, only 331 new homes were delivered, which falls short of the 410-target set by the London Plan. Moreover, the Council's Local Housing Needs Assessment (stage 1) (July 2021) shows that meeting the target of 411 homes per annum would generate a shortfall against local need. Furthermore, the AMR (2019/2020) sets out that only 34 new affordable units were delivered in 2019/2020 across the whole Borough. The

Assessment acknowledges that the Borough has a potential scale of need for 1,123 rented affordable and 552 shared ownership homes per annum.

- 8.5 Recent planning appeals have shown that demand for housing within the Borough can be given greater priority over the restriction to retain employment land uses in areas deemed inappropriate for continued use. This is evidenced in the approved permission for Lockcorp House (LPA Ref. 17/1033/FUL) which was granted via appeal in May 2018 to deliver student housing.
- 8.6 Given the demand for housing both within the Borough and recent delivery rates it is considered that the need for residential development, and the chronic under supply of affordable homes in this location outweighs the need to retain an employment use on the Site.
- 8.7 The redevelopment proposals will deliver 116 new residential dwellings, comprising a total of 58 on-site affordable houses delivering a total of 50% affordable housing by unit on Site (40% by habitable room) which will be a mix of affordable rented and intermediate units. The proposals would provide an important contribution toward a significant undersupply of affordable housing within the Borough in line with London Plan strategic policy to deliver new homes across London, including family housing. The proposals would also reduce the Council's reliance on limited small housing sites, which typically result in limited affordable housing provision.
- 8.8 In addition to the proposed residential provision, the Applicant also seeks to provide economic benefits on site through provision of affordable workspace (117sqm) (Use Class E) despite demand conclusions for the Site.
- 8.9 The demolition of the existing buildings which cover the majority of the Site will also considerably 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 whilst also enhancing the amenity of neighbouring

properties through improvements to daylight and sunlight. The proposals will offer enhancements to the public realm by opening up access to the River Crane to the north of the Site, providing on-site play space whilst also significantly enhancing the biodiversity of the Site. Notably the proposed development will reduce HGV movements in and around the Site and will therefore improve highways and pedestrian safety in the immediate area.

- 8.10 Overall, the proposals will provide a variety of economic, social and environmental benefits. There is clear justification and significant benefits in the redevelopment of the Site for residential accommodation which is appropriate within the surrounding residential context and can provide a significant number of affordable homes. 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 requirement to deliver a significant level of new homes specifically within West Twickenham.