

### 2.13 Planning policy context

The development plan for the London Borough of Richmond upon Thames comprises:

- The NPPF (2021)
- The London Plan (2021)
- The London Borough of Richmond upon Thames Local Plan (July 2018)

London Borough of Richmond are currently reviewing and updating their Local Plan. The draft Plan is currently in early stages of preparation with an adoption not anticipated until Autumn 2024.

There are also a number of supplementary guidance documents published by the GLA and London Borough of Richmond which have been taken into account during the course of the design development and preparation of the proposed scheme.

The Site is subject to the following designations within the Local Plan (July 2018):

- Archaeological Priority Area
- Key Office Area - West Twickenham Cluster
- Locally Important Industrial Land and Business park – West Twickenham cluster (including Greggs Bakery and surroundings), Twickenham.

The existing Bakery site (B2 Class Use) is identified within the 'West Twickenham Cluster (including Greggs Bakery and surroundings), Twickenham' designated Locally Important Industrial Land and Business Park. The site is also located within the 'West Twickenham Cluster' Key Office Area.

Given the site's location within a primarily residential area and the identified amenity impacts and site constraints associated with HGV movement to and from the site, the continued use of the site entirely for employment led floorspace is considered unsuitable.

Furthermore, there is an acute housing shortage across London and the site is considered appropriate to deliver an important contribution to the overall housing supply and affordable housing offer within the Borough. The proposals therefore comprise a sensitive residential-led scheme alongside industrial floorspace.

The scheme has been carefully designed and responds to the site constraints and surrounding context in accordance with the Local Plan Policies LP 1 (Local Character and Design Quality); LP2 (Building Heights); LP17 (Green Roofs); LP5 (Views and Vistas); LP8 (Amenity and Living Conditions); LP31 (Playspace); LP35 (Housing Mix and standards); LP22 (Sustainable Design and Construction).

In summary, the current proposals will deliver the following public benefits which are considered to outweigh any loss of the redundant employment space:

- Delivering 97 residential dwellings which will contribute to the Borough's much needed housing supply;
- 1000 sq m of light industrial (Use Class E) floorspace will be provided in line with highways constraints and local need;
- Affordable housing will be provided on site, comprising 20% by unit;
- Development of a brownfield site;
- Significant amenity improvements to neighbouring properties by providing residential into the existing settlement area and Use Class E where appropriate;

- Significant highways improvement will be achieved by reducing the amount of HGV's trips along on residential streets;
- Opportunities for opening up access to the River Crane at the northern end of the site for landscaping and playspace.
- Creating a new street scene and improving the visual appearance of the site.

## 2.14 Planning history

### 2.14.1 Planning decision review (19/0646/FUL\_)

Following a recommendation for refusal from the London Borough of Richmond upon Thames, the planning committee resolved to refuse the residential-led mixed-use scheme on 5th August 2020 for the reasons outlined in the officer's report. A summary of the supported and refused aspects are set out below.

#### Aspects supported (aside from two reasons for refusal)

- Provision of residential dwellings on the site as part of a mixed-use scheme
- General approach to design, with officers highlighting the visual improvements as a result of the proposed scheme
- Proposed height, density and massing including the provision of a five storey building on site
- Enhancements in relation to energy efficiency as well as planning and habitat enhancements proposed along the 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
- Public support for the scheme

#### Reasons for refusal

- Reduction of industrial floorspace at a site designated as Locally Important Industrial Land and Business Park
- Lack of binding obligation to secure early and late stage reviews relating to affordable housing provision

The reasons for refusal along with our response to the comments are outlined in more detail below. This application seeks to address the reasons for refusal where possible.



Refused scheme ground floor plan

#### Loss of industrial floorspace comment

The proposal would result in a significant reduction in the amount of industrial floorspace at a site designated as Locally Important Industrial Land and Business Park. Without adequate replacement floorspace, would reduce employment opportunities within the locality, contrary to the aims of the Council's employment policies. The proposal would therefore fail to comply with Policies LP40 and LP42 of the Local Plan (2018), the Greater London Authority (GLA) Industrial Land Demand Study (2017), the GLA Industrial Land Supply and Economy Study (2015), and the Mayor of London's Land for Industry and Transport Supplementary Planning Guidance (2012).



#### Loss of industrial floorspace response

The existing buildings are in need of replacement and have laid empty since Greggs vacated the site in 2016. Due to the vehicle access constraints, there is limited opportunity for industrial / commercial uses on the site that would not create conflict in this residential area.

In this resubmitted application, the applicant's aim is to achieve the maximum re-provision of industrial floorspace suitable for the site and its context, as detailed on pages 33 and 34 of this report.

#### Affordable housing comment

Without a binding obligation to secure early and late stage viability reviews, the proposal fails to demonstrate the level of affordable housing proposed would be maximised within this development and therefore does not compensate adequately for the substantial loss of employment floorspace nor contribute fully to the identified need in the borough for affordable housing and is therefore contrary to policies LP36, LP40 and LP 42 of the Local Plan (2018) and the Affordable Housing Supplementary Planning Document.



#### Affordable Housing Response

The previous full residential-led mixed-use scheme proposed 40% affordable homes equating to 46 dwellings. The tenure mix was agreed with the Council's Housing department and the Applicants. This was secured by a Unilateral Undertaking however the legal mechanism needed to secure a financial appraisal requires a bilateral agreement.

This new proposal continues to offer affordable housing.





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# Design process

## 3.1 Introduction

This section outlines the design constraints and opportunities for a mixed-use scheme and the subsequent design and consultation process to develop the proposals. The scheme is based on the agreed principles of the previously submitted and rejected residential scheme, but amended to deliver the maximum industrial floorspace that local roads can accommodate on this site

## 3.2 Design constraints

The following constraints have been considered and mitigated. This analysis has informed the design principles.

-  Site boundary
-  Main sewer lines and associated restriction of 1.5m clearance either side
-  Noise and air pollution from railway and neighbouring commercial site
-  Railway level at the same level as the site
-  Existing house within the site boundary
-  18 metres overlooking distances
-  8 metres river access requirement for Environmental Agency
-  Potential sunlight, daylight and overshadowing considerations
-  Surrounding storey heights
-  View from park
-  Adjacent townhouses close to site boundary
-  Existing access points
-  Constrained access roads unsuitable for HGV commercial vehicles
-  Sun path
-  Approved affordable housing scheme
-  Hamilton Road Conservation Area 72



Design constraints diagram

### 3.3 Is a full industrial scheme achievable on the site?

A fully industrial scheme to replace the existing operation was reviewed at the outset of the project to establish its feasibility. Constraints to developing an industrial scheme are as follows:

- **Substantial sewer main** - running down the site, where a build-over agreement would not be acceptable, and thus prevents large span industrial units being developed.
- **Site access, parking and vehicle movements** - limit the number and types of vehicles that can access the site to mitigate significant congestion and ensure pedestrian safety.
- **Noise and fumes** - prevent large-scale or odour-creating types of industrial uses due to causing nuisance to near by neighbours - as reported by Greggs on the existing use.
- **Building heights and overshadowing** - would need to be considered to avoid impacting nearby neighbours; typical industrial buildings have a minimum 8m clear internal height, larger than most two storey houses.

The scheme shown to the right explored a fully industrial scheme when factoring in the sewer main and impact of building heights. This achieved 3,773 sq m of ground floor footprint, rising to circa 6,223 sq m if the larger building is increased to three storeys, equating to 68% of the existing industrial space on-site, 95 parking spaces and six dedicated loading areas.

On reviewing the scheme, the transport consultant advised that the HGV vehicle trip generation from this size scheme would not be viable on the surrounding road network, resulting in an undeliverable scheme. Additionally, the industrial space consultants advised that, due to the limitations on vehicle access, this amount of space would not be lettable - further demonstrated by the marketing evidence submitted in support of this application.

Therefore, the conclusion was that a fully industrial scheme was not deliverable on this site, without restrictions on access and types of uses, which then in turn makes the scheme unviable.

Following this, the transport consultant undertook a review on maximum HGV and delivery vehicle movements that the surrounding road network and site access points could accommodate to provide the maximum deliverable industrial area - this is explored on the next page.



Ground floor



First floor



Second floor



Roof plan

**Full industrial scheme of B1/B2/B8 uses achieving 3,773 sq m (one to three storeys)**

### 3.4 Achievable industrial re-provision

The applicant's aim is to achieve the maximum re-provision of industrial floorspace suitable for the site and its context. The remainder of the site would then be provided as much-needed residential homes at a mix of tenures.

The main barrier to industrial re-provision is the access to the site, which is via narrow roads unsuitable for HGVs. A clear history of vehicle conflicts and the damage to parked cars and pavements is fully documented in the transport consultant's supporting report. In addition, the significant sewer line running through the middle of the site requires that any future development accommodates full access and should not be built over.

A transport assessment has calculated the maximum floor area that could be provided on-site taking into consideration the amount of vehicle trips and HGV conflicts generated by different industrial uses. The options to the right illustrate the maximum floor area of each industrial use class in the most appropriate location for industrial at the southern end of the site.

Table 3-6: Maximum Industrial Floorspace

| INDUSTRIAL USE CLASS | MAXIMUM FLOOR AREA (SQM) |
|----------------------|--------------------------|
| B2                   | 790                      |
| E(g)(iii)            | 900                      |
| B8 Warehouse         | 735                      |
| B8 Distribution      | 555                      |



One storey with mezzanine of Use Class B2 (790 sq m)



One storey of Use Class B8 Warehousing (735 sq m)



One storey with mezzanine of Use Class E(g)(iii) (900 sq m)
















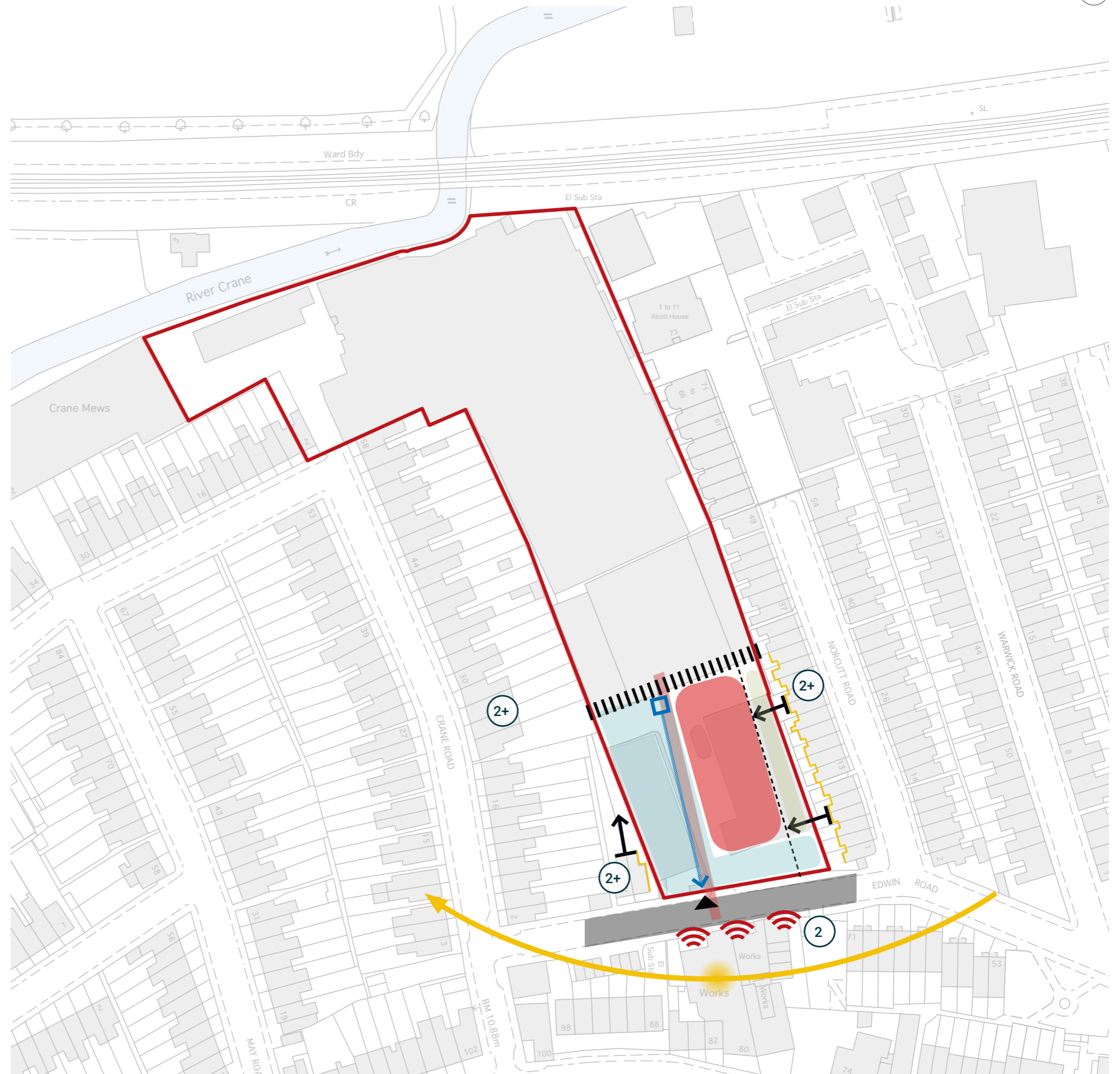
One storey of Use Class B8 Distribution (555 sq m)

### 3.5 Industrial use design constraints & opportunities

The following constraints have been considered and mitigated. This analysis has informed the design principles.

**Key**

-  Site boundary (proposed industrial area)
-  Division line to suit maximum industrial floorspace possible
-  Main sewer lines and associated restriction of 1.5m clearance either side
-  Noise and air pollution from neighbouring commercial sites
-  Existing factory footprint
-  Setback main warehouse structure from adjacent townhouses with only a single storey element / landscaping to mitigate DLSL overshadowing
-  Surrounding storey heights
-  Existing access points
-  Constrained access roads unsuitable for HGV commercial vehicles
-  Sun path
-  Sufficient access, parking and manoeuvring space of large vehicles
-  Appropriate industrial footprint
-  New vehicle route





















Industrial design constraints and opportunities diagram



### 3.6 Residential use opportunities

The rest of the site is considered most suited for residential use, repairing the urban grain of the area. Whilst taking into account the site constraints, opportunities for this typology have been identified.

**Key**

-  Site boundary
-  Division line to suit maximum industrial floorspace possible
-  Introduce urban grain of surrounding residential streets
-  Massing set-back from boundaries with gardens to the east and west
-  Improved riverside access with landscaping
-  Opportunity for height in centre of site
-  Buildings mass within existing building footprint in centre of site with least impact to surrounding
-  Residential buildings set-back from railway and river
-  Existing access points
-  New vehicle route
-  Safeguard area in landscape for potential future bridge link
-  Pedestrian connection to the river
-  Sun path
-  Approved affordable housing scheme
-  Surrounding buildings number of storeys
-  Main sewer lines and associated restriction of 1.5m clearance either side
-  8 metres river access requirement for Environmental Agency
-  18 metres overlooking distances



Design opportunities diagram