

**RE: Cross Deep Court (Units 3 and 15), Heath Road,  
Twickenham, TW1 1A**

**Planning Technical Note (Ref. 22/3577/FUL)**

This supporting Planning Technical Note, prepared by Create Planning (“Agent”), is submitted to the London Borough of Richmond upon Thames (“Council”) on behalf of Grainmarket Asset Management (“Applicant”), in support of Units 3 and 15, Cross Deep Court, Heath Road, Twickenham, TW1 1AG (“Site”).

**Proposal:** Full Planning Application for the: *“change of use of part ground floor and part first floor to form seven apartments including associates works.”* (“Proposal”).

**Site & Surroundings:** The Proposal relates to a four-storey corner-plot building located on the south side of Heath Road and fronting King Street Parade, South Twickenham ward.

Unit 3 fronts Cross Deep to the east and comprises a ground-floor frontage between two retail units leading to a first-floor gym (operated by Escape Fitness). The mezzanine floor was inserted as part of planning permission ref. 14/4537/FUL. Unit 15 fronts Heath Road to the north and comprises a ground-floor retail unit and ancillary first-floor storage (operated by Stevensons sports shop). Other uses (outside of the Site red line) include ground-floor commercial units including a pharmacy. The Planning Statement submitted with the application states that there are residential units on the upper floors. The basement comprises a gym (operated by Pure Gym), which was previously occupied by Rileys Snooker Hall.

The building forms part of the Heath Road Secondary Shopping Frontage (Nos. 1-85 odds) and is within the Twickenham Main Centre Boundary and forms part of the Twickenham Area Action Plan (AAP). It is within a Takeaway Management Zone.

There is an Article 4 Direction in place restricting basement development. A further Article 4 was implemented in August 2022, restricting change of use from Class E commercial to residential. The Site is not a listed building and is not in a conservation area though the boundary of CA8 Twickenham Riverside Conservation Area is directly opposite the Site approx. 20m to the east. There is no Village Planning Guidance for the area.

The Site is within the Twickenham and Marble Hill Archaeological Priority Area. Nos. 54 and 60-62 King Street approx. 28m directly north are Grade II Listed Buildings. There is also a row of Buildings of Townscape Merit (BTMs) along King Street.

The Site is in Flood Zone 1 though is in an Area Susceptible to Surface Water Flooding, an Area Susceptible to Groundwater Flooding and a Throughflow Catchment Area.

A service yard is located to the rear of the Site which is accessed via an archway from Heath Road. The Site has a Public Transport Accessibility Level (PTAL) of 5 which is considered 'very good' on a scale of 0 to 6b with 0 being worst and 6b being best. Controlled Parking Zone CPZ D - Central Twickenham is in operation Monday to Saturday 8:30am to 6:30pm (Bank and Public holidays free).

Unit 3 is subject to a S106 Agreement restricting parking permit eligibility to one business permit only for the commercial occupier (Blue Badge holders exempt).

**Planning History:** There is extensive planning history related to the site. The key planning application relevant to the Site is application ref. 14/4537/FUL under which planning permission was granted on 16/04/2015 for: 'Flexible use of premises for A1, A2, A3, B1(a) (Office), D1 (Medical/Health Services, Creche/Day Nursery, Museums and Exhibition Space only) or D2 uses (or a combination of these).' This permission also included a number of relevant conditions including restrictive land use conditions for the B1 office use, A1 retail use and D1 social/community use. These conditions were carried over the most recently implemented variation (under application ref. 15/2546/VRC, consent granted 12/10/2015) and read as follows:

#### U82580 A1 Use – Restriction

The A1 use hereby approved shall not benefit from the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking or re-enacting that Order) for the change of use to C3 (residential) use.

REASON: To safeguard the character and appearance of the locality and amenities of the occupiers of adjoining property.

#### U81757 Specific Use - B1 Use Class

The premises hereby approved shall be occupied solely as an office and for no other purpose whether or not within Use Class B1 as specified in the schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision revoking or re-enacting that order.

REASON: To safeguard local road and parking conditions and residential amenity of nearby occupants.

#### U80801 B1 Use – Restriction

The B1(a) (office) use hereby approved shall not benefit from the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking or re-enacting that Order) for the change of use to C3 (residential) use.

REASON: To safeguard the character and appearance of the locality and amenities of the occupiers of adjoining property.

## U80798 Specific Use - D1 Use Class

The premises hereby approved shall be occupied by a medical/health services/crèche/day nursery/museums/exhibition space and for no other purpose whether or not within Use Class D1 as specified in the schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision revoking or re-enacting that order.

REASON: To safeguard local road and parking conditions and residential amenity of nearby occupants

A number of other conditions have been varied since planning permission was granted relating to customer numbers and hours of operation.

Please note planning application ref. 99/0111/FUL under which planning permission was granted on 17/03/1999 for: 'Alterations to bring shopfront forward and increase ground floor and first floor shop areas.' The applicant advises that these works were part implemented via the construction of a wall within the colonnade, though the permission was never implemented in full. The applicant advises that the same works are being proposed in the pre-application. The Case Officer further notes that a later application for these works was submitted in 2003 and subsequently refused on 14/01/2004 under planning application ref. 03/3179/FUL.

**Relevant planning policies:** As well as the National Planning Policy Framework (NPPF) (2021) a planning application would typically be assessed against the following Local Development Plan policies and supplementary planning guidance:

- NPPF (2021)

The NPPF came into effect on 27 March 2012 and was subsequently revised in 2019 and more recently in 2021 and is a material consideration in planning decisions. The NPPF, as supported by the Planning Practice Guidance (PPG), sets out national planning policies and how these are expected to be applied.

The NPPF does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved and proposed development that conflicts should be refused unless other material considerations indicate otherwise.

Further, the NPPF states that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

The NPPF sets out that achieving sustainable development means that the planning system has 3 overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

(a) an economic objective – to help build a strong, responsive, and competitive economy, by 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;

(b) a social objective – to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and,

(c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

The NPPF sets out a presumption in favour of sustainable development. For decision-taking this means:

(c) approving development proposals that accord with an up-to-date development plan without delay; or (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Paragraph 38 of the NPPF states that local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social, and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

- London Plan (March 2021)
- Richmond upon Thames Local Plan (2018)

The relevant policies include (but are not limited to): Policy LP1 Local Character and Design Quality • Policy LP3 Designated Heritage Assets • Policy LP4 Non-Designated Heritage Assets • Policy LP7 Archaeology • Policy LP8 Amenity and Living Conditions • Policy LP10 Local Environmental Impacts, Pollution and Land Contamination • Policy LP14 Other Open Land of Townscape Importance • Policy LP15 Biodiversity • Policy LP16 Trees, Woodlands and Landscape • Policy LP20 Climate Change Adaptation • Policy LP21 Flood Risk and Sustainable Drainage • Policy LP22 Sustainable Design and Construction • Policy LP25 Development in Centres • Policy LP26 Retail Frontages • Policy LP27 Local Shops, Services and Public Houses • Policy LP28 Social and Community Infrastructure • Policy LP34 New Housing • Policy LP35 Housing Mix and Standards • Policy LP36 Affordable Housing • Policy LP37 Housing Needs of Different Groups • Policy LP40 Employment and Local Economy • Policy LP41 Offices • Policy LP44 Sustainable Travel Choices • Policy LP45 Parking Standards and Servicing

- Richmond upon Thames Supplementary Planning Documents (SPDs)

The relevant guidance include (but are not limited to): Air Quality SPD (June 2020) • Affordable Housing SPD (March 2014) • Buildings of Townscape Merit SPD (May 2015) • Design Quality SPD (February 2006) • Development Control for Noise Generating and Noise Sensitive Development SPD (September 2018) • Planning Obligations SPD (June 2020) • Refuse and Recycling Storage Requirements SPD (May 2015) • Residential Development Standards SPD (March 2010) and Housing Optional Technical Standards update (June 2015) • Shopfronts SPD (March 2010) • Small and Medium Housing Sites SPD (February 2006) • Sustainable Construction Checklist SPD (January 2016) • Transport SPD (June 2020) • Twickenham Area Action Plan (July 2013).

- Other Richmond upon Thames Planning Guidance

The other relevant guidance include (but are not limited to): Construction Management Plan – Guidance Notes and Template • Richmond Biodiversity Action Plan • Strategic Flood Risk Assessment – Level 1 (Updated 2020 with further minor updates in March 2021) • Sustainable Drainage Systems – Planning Guidance Conservation Area Statements • CA8 Twickenham Riverside.

**Planning considerations:** The main issues for consideration are: • Principle of development / land use • Character, design and appearance • Heritage • Housing mix and standards; • Affordable Housing; • Neighbouring amenities; • Biodiversity and trees; • Flood risk and sustainable drainage; • Sustainability; • Transport and highways; • Fire safety.

This document solely focuses on the planning matters material to the determination of the application, which is supported by other 'technical' reports regarding fire safety, transport, sustainable drainage, amenity impact etc.

**Principle of development: change of use:** Current lawful use: Unit 3 Cross Deep has permission for a flexible use of A1, A2, A3, B1(a), D1 or D2, or any combination of these, which was permitted in 2014. This permission related only to Unit 3, and 15 Heath Road (the Stevenson's site) remained as was permitted in 1987, for retail on both ground floor and first floor. The application proposes the part conversion of the ground floor and the whole of the first floor to residential. In light of the above, the principle of the potential loss of retail and social infrastructure/community use must therefore be considered only.

**Principle of loss of retail use:** The building forms part of the Heath Road Secondary Shopping Frontage (Nos. 1-85 odds) within the Twickenham Main Centre Boundary and it forms part of the Twickenham Area Action Plan (AAP).

Local Plan Policy LP25 (Development in Centres) Part A states that development in the borough's centres, as defined in the centre hierarchy, will be acceptable if it:

1. Is in keeping with the centre's role and function within the hierarchy and is of a scale appropriate to the size of the centre (also see the Spatial Strategy of this Plan); and
2. Is in an appropriate location, as follows:
  - a. A1 uses should be located within, adjacent to or well-related (or capable of being made so) to designated shopping frontages.
  - b. For other appropriate uses (see B & C below), major development and/or developments which generate high levels of trips should be located within a Main Centre Boundary. Elsewhere development should be located within the defined Area of Mixed Use (AMU boundary). For centres, or parts of centres where no boundary exists, proposals should be well-related to designated shopping frontages.

Proposals not in the above locations, including extensions to existing retail and leisure developments of more than 200sqm gross, should satisfy the Sequential Test as set out in national policy and guidance. Out of centre retail development is not considered appropriate in line with the London Plan; and

3. Does not adversely impact on the vitality and viability of the centre in which the development is proposed, or another centre. When assessing proposals for development outside of existing centres, applicants will have to comply with the requirements of national policy and guidance in relation to impact assessments. For retail developments, including extensions, of over 500sqm gross, the Council will require a Retail Impact Assessment. The scope of such assessments will need to be agreed with the Council before submitting a planning application; and
4. Optimises the potential of sites by contributing towards a suitable mix of uses that enhance the vitality and viability of the centre. Commercial or community uses should be provided on the ground floor fronting the street, subject to other Local Plan policies, including the retail frontages Policy LP26.

Part B states that in addition to Part A above, the following applies to development proposals in the borough's five main centres:

1. The Council will support appropriate development<sup>1</sup> in the five main centres.
2. The Council will encourage proposals for leisure, cultural and tourism facilities which contribute to the diversity of the offer.
3. Proposals for A1 uses should include, where appropriate, units of a size suitable for modern retail needs (particularly in Richmond centre, where there is a shortage of retail units with larger floor-plates) whilst retaining sufficient traditional smaller units that add to the local character and which are important to local businesses.

Supporting text para. 7.1.20 states that the size of units is also important; new developments in some centres (particularly Richmond) may include provision for larger retail units. However, smaller units which can enhance a centre's sense of identity and attractiveness, should be retained. Para. 7.1.21 states that conditions may be applied where necessary to restrict the size of units, or to subdivide shopfronts to reflect the bay widths in the parade, in line with the Council's SPDs on Shopfronts as well as the Village Planning Guidance SPDs.

With regard to residential development, supporting text para. 7.1.23 states that whilst residential uses can contribute to the overall vitality of a centre, housing on the ground floor contributes less to vitality than most commercial or community uses. Therefore, commercial or community uses will be expected to front the street. Where a proposal is in a designated shopping frontage, Policy LP 26 in 7.2 'Retail Frontages' will apply. There is a growing trend to convert the rear of premises to residential use. Where conversion is acceptable, the access to any residential unit should be from the front rather than the rear where practicable.

Para. 7.1.24 states that residential development contributes to the overall health of centres and to meeting the Borough’s housing target. There is scope to increase housing stock in the centres, such as through increased densities or introducing housing in upper floors, provided that this does not lead to an unacceptable loss of commercial or community space, and that the commercial or community uses on the ground floor remain of a viable size.

Within the Assessment of Borough Centres in London Borough of Richmond upon Thames (May 2023), Twickenham is categorised as a “district” centre in the Mayor’s town centre network and is an important town centre with a wide range of convenience and comparison goods shopping, employment space, and a cultural and leisure offer including a museum, library and two theatres. It is the home of the English Rugby Football Union and Harlequins at the Stoop which support its well-represented Food & Beverage offer catering for supporters as well as locals and office workers historically.

**Twickenham district centre’s key roles include:**

- convenience shopping – Waitrose, Iceland, Tesco Express, Co-op and Marks & Spencer Simply Food provide the main convenience, which could serve both main food and top up shopping but most likely to include the latter with the exception of Waitrose. Supported by nine independent convenience stores, sandwich shops, off licences, delicatessens, bakery/cafés, a butcher, greengrocer, fishmonger and confectioner.
- comparison shopping – small independent specialist retailers, with a limited number of multiple retailers, Heath Road has a number of retailers in the DIY sector as well as the Timber Yard
- entertainment and evening economy – a good number of restaurants/cafes and a reasonable number of fast food/takeaways and pubs/bars. Only four betting shops/casinos/amusement units.
- services – as well as the food and beverage sector several services are available including a tailor, cobbler, several opticians, dry cleaner, hairdresser and beauty salon/ nail bars.
- community facilities – including four dentists, two gyms, three physiotherapists, a day nursery/pre-school, health centre, job centre, museum, police station, veterinary practice, yoga studio, Twickenham Library and the Exchange Theatre and Mary Wallace Theatre.

**Twickenham: Strengths & weaknesses identified in the Richmond Retail and Leisure Study 2023<sup>2</sup>**

**Strengths**

- Good food supermarkets (Waitrose, Iceland Tesco Express, the Coop and Marks & Spencer Simply Food).
- Lowest vacancy rate of the five town centres
- Church Street and side roads leading to the Embankment provide a quieter shopping experience with less traffic, outside seating and public green space/planting.
- A good range of non-retail service facilities with all but one of the categories well represented.
- The provision of restaurants/cafes is significantly higher than the national average.

**Weaknesses**

- Limited number and selection of comparison retailers and few multiple comparison retailers for its size.
- The busy A305 dissects the town centre.
- Crime rate higher than borough average.
- Number of car parking spaces raised as an issue in a high proportion of survey responses, although there is significant parking provision in the centre.

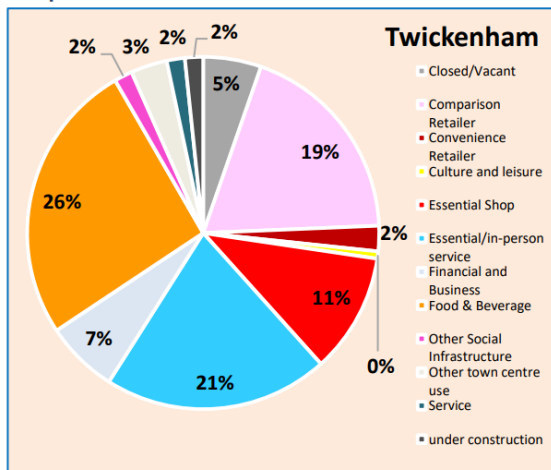
Source: [RRLS Phase 2 2023](#)<sup>2</sup> & SSA.

Twickenham town centre has approximately 300 commercial units/community uses recorded by the Council’s 2022 Town Centre Land Use Survey<sup>14</sup>. Over a quarter of units in Twickenham are businesses in the Food & Beverage sector – cafes, restaurants and pubs/wine bars, and is the centre with the greatest proportion of such uses. Prior to the pandemic Twickenham town centre’s daytime population included many office workers employed at large office blocks such as Regal House, Bridge House and of course the Civic Centre. Twickenham is also the home of the national rugby stadium and serves rugby supporters visiting it and the Stoop. These factors have no doubt supported such a well-developed Food & Beverage sector.

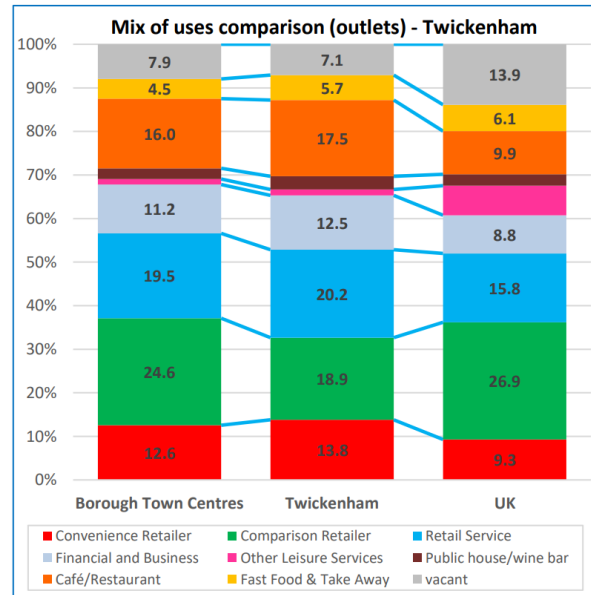


Twickenham also has a larger than average proportion of essential shops and essential services than the average borough town centre. However, the proportion of comparison retailers is below the average. It has 57 comparison retailers, less than Richmond and East Sheen but more than Whitton and Teddington.

Composition of centre:

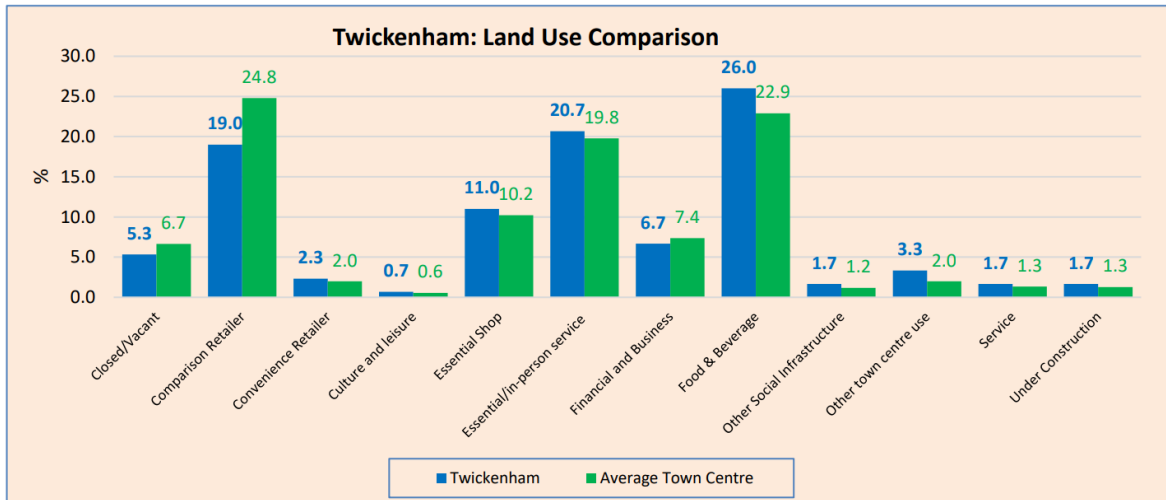


Source: SSA Town Centre Land Use Survey 2022<sup>14</sup>



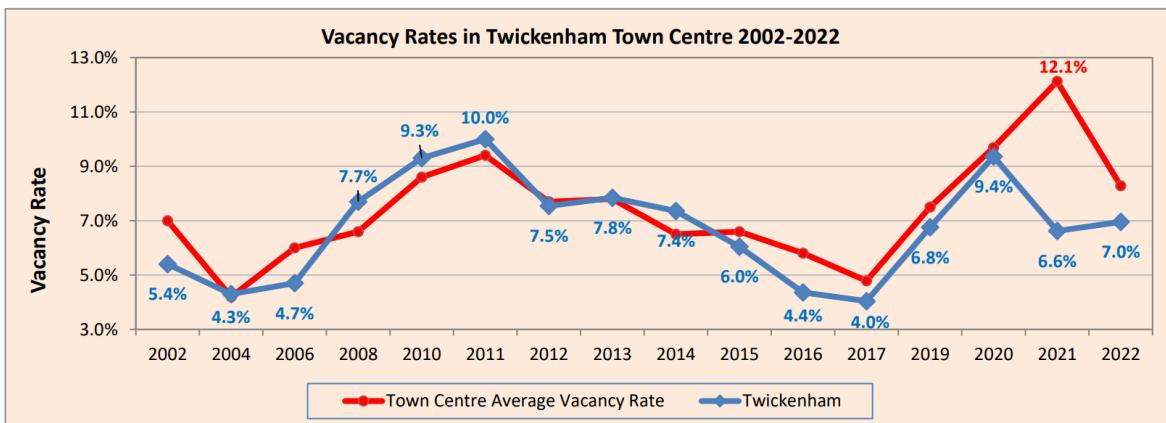
Source: Richmond upon Thames Retail and Leisure Study Phase 2 2023<sup>2</sup> & SSA.

Using GOAD's10 dataset it is possible to compare Twickenham to a hypothetical "average UK town". The same categorisation of land uses has been applied to the Town Centre Land Use data | 2022<sup>14</sup> to provide a borough comparator. In terms of numbers of outlets, Twickenham differs from the UK average having fewer comparison retailers but more convenience retailers and more retail, leisure and financial and business services. This is roughly the same picture as in 2015. Overall the amount of floorspace in the centre has increased slightly since 2015 (with some redevelopment on Heath Road). If we look further back to 2005, Twickenham's score (outlets) for comparison retail was 72 and for convenience retail only 63. In 2005 Twickenham had c.12,500m<sup>2</sup> of comparison retail floorspace, and 5,800m<sup>2</sup> of convenience retail floorspace. The latest floorspace figures show an increase in both retail sectors, particularly in convenience shopping [underlined for emphasis].



Source: SSA Town Centre Land Use Survey 2022<sup>14</sup>

We can look in more detail at how Twickenham compares with the UK average town. Heath Road has several businesses selling DIY, soft furnishings, fitted kitchens, carpets etc. Twickenham also has good convenience provision in a range of retailers and unusually a fishmonger in the centre. Conversely supermarkets are under-represented, although Waitrose, Marks & Spencer Simply Food, Tesco, Sainsburys (Twickenham Station) and Co-op are all represented. Twickenham has a higher proportion of businesses in the leisure services sector, particularly restaurants, serving rugby supporters, office workers and locals alike.



Source: SSA Town Centre Land Use Surveys <sup>14</sup>.

In 2022 Twickenham's all frontage vacancy rate was 7%, up from 6.6% in 2021 but slightly lower than the 2022 town centre average of 7.8%. The graph above shows how Twickenham has closely mirrored vacancy rates for borough town centres. However, in 2021 Twickenham's vacancy rates were notably lower than the average. This appears to indicate Twickenham is a strong/healthy centre which should withstand changes including the Covid19 pandemic. The spending data seem to point to the same conclusion [underlined for emphasis].

We consider the proposal relates to the loss of ancillary retail (storage and an unusually large area). Nevertheless, the conversion from retail to residential can be acceptable in policy terms provided the retained retail space would remain viable.

Local Plan Policy LP26 (Retail Frontages) primarily relates to areas that are designated primary or secondary shopping frontages. Part B states that a non-A1 proposal will be acceptable in the secondary shopping frontages only if it:

1. (a) meets community needs (such as a dentist, clinic or health centre, veterinary surgery, gym, fitness studio and facilities which would enable the public better access to police services) and provides a direct service to visiting members of the public, or (b) falls within Use Classes A2 to A5 (now Use Class E and Sui Generis) or, (c) is another commercial use which provides a direct service to visiting members of the public without appointment.

In addition to (a) or (b) above, the proposal must meet the following criteria:

2. the proposed use should retain a 'shop-like' appearance; it should not have a detrimental visual impact on the shopfront and should respect the heritage and character of the centre, taking into account the Village Planning Guidance SPDs;
3. the [proposed use has to be complementary to the area's shopping frontage and provide a direct service to the public; and 4. it will not create an unbroken run of three or more non-A1 units

Part C relates to over-concentration of uses and impact on amenity. This states that the Council will resist proposals that result in an over-concentration of similar uses (such as betting shops, estate agents, restaurants, public houses, bars and takeaways) in any one area and/or would result in an adverse impact on the amenity of nearby users as well as surrounding residential areas, including an adverse cumulative effect.

Part D relates to shops selling essential goods and Post Offices. This states that in secondary shopping frontages in smaller centres including local parades, changes of use from shops selling (or whose last occupant sold) essential goods to non-A1 uses will be resisted if there is no similar alternative within 400 metres. This applies even if the proposal is acceptable in terms of criteria B & C above.

Part F relates to marketing requirements for changes of use. This states that where a proposal involves a change of use not supported by policy, the Council will require satisfactory evidence of full and proper marketing of the site. The applicant will be expected to undertake marketing in line with the requirements set out in Appendix 5 of the Local Plan.

The Twickenham Area Action Plan (TAAP) was adopted in July 2013. Officers do not agree with the suggestion in the supporting information for the pre-application proposal that the document should be given limited weight owing to it being adopted in 2013. The TAAP is an adopted supplementary planning document and is intended to provide a framework for development and change in Twickenham town centre for the next 15 years (i.e. until 2028). Its contents therefore remain relevant.

The focus of this policy is not to create a major increase in retail floor space, which would not be justified within the Plan period, but consolidate and support the main retail core and the specialist areas, by continuing to protect Key Frontages in retail use and encouraging small new specialist units, in appropriate locations to extend the retail offer. The upgrading of existing shopping will be welcomed. The TAAP highlights that whereas in Key frontages loss of retail is not normally acceptable, in Secondary frontages greater flexibility is allowed to encourage an appropriate level of diversification. With regards to residential uses, the TAAP acknowledges that these help to enliven the town centre, bring in additional spending and ensure that the area has activity throughout the day and evening. Within town centres, residential development commonly forms part of a mixed-use scheme, often helping to cross subsidise less profitable uses. With regards to the application site, the spatial aim for King Street is identified as being the creation of a more concentrated primary shopping area with enhancement of retail frontages, improvements to the shopping environment and an extended range and quality of retail offer. The continued enhancement of the environment of Heath Road is identified as a key strategy, to reinforce its role as a specialist retail and business area. Improvements in active travel and the pedestrian environment are strategic aims for the whole of Twickenham town centre.

The retail use at ground floor would be retained. As highlighted above, conversion from retail to residential can be acceptable in policy terms provided the retained retail space would remain viable. Please refer to the Open Market Appraisal prepared by Milestone Commercial.

The units would be usable (for example, not an awkward shape), that the same facilities would be available (for example a toilet and/or kitchen area), and that the size of the unit would ensure the retail use is viable and usable. The unit is currently occupied and the Applicant is in negotiations for the existing occupier to remain. The submitted plans do show the type of facilities that the retail units would have including W/C, kitchen and some storage that is consider sufficient for this location..

As it stands, we understand that there is no in principle objection to a residential use at first-floor.

**Principle of loss of community space / infrastructure:** Loss of social or community infrastructure will be resisted. Proposals involving the loss of such infrastructure will need to demonstrate clearly:

1. That there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted; or
2. That the existing facilities are being adequately re-provided in a different way or elsewhere in a convenient alternative location accessible to the current community it supports, or that there are sufficient suitable alternative facilities in the locality; and

Please refer to the Open Market Appraisal prepared by Milestone Commercial.

It is important to note that there is another gym within Cross Deep and the snooker hall did not survive. There are numerous other gyms within the local area.

### Google Map: Nearby Gyms [TW1]

**4.3** ★★★★★ (47)  
Gym · Unit 1 Heath Rd  
Open 24 hours  
"Good gym good staff, really nice people"

**Anytime Fitness**  
4.4 ★★★★★ (101)  
Gym · 1st floor, Regal House, 70 London Rd  
Open 24 hours  
"Good gym and friendly staff"

**Blitz CrossFit**  
4.9 ★★★★★ (34)  
Gym · 16 Station Yard  
Open · Closes 9PM  
On-site services

**Atomic Revolution Strength Training**  
5.0 ★★★★★ (9)  
Personal trainer  
Open · Closes 9PM  
"Before working with Alex, I felt like my efforts in the gym were going ..."

**Better Gym Teddington**  
4.4 ★★★★★ (105)  
Gym · 1st Floor, 20-28 Broad St  
Open · Closes 10PM

3. The potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed. This should include evidence of completion of a full and proper marketing exercise of the site for a period of at least two consecutive years.

In consideration of the marketing, would draw the following conclusions:

- There is demand from social or community infrastructure in this location, but it is limited
- There is demand for alternative uses, but occupiers require larger and more useable floorspace, fewer parking restrictions, ideally allocated parking, a more commercial location, and rear extraction (for restaurant/catering businesses)

To conclude, it is the opinion that the building has limited potential to be let in continued commercial use due to the following site constraints:

- Unsuitable road connections for transportation of goods on large articulated lorries
- Too small for proposed uses - lack of sufficient on-site parking - restricted access into the site - noise and disturbance to local residents - limited internal configuration

In light of the above, it is considered that a robust and thorough approach has been applied, as well as the costs involved in de-contaminating the land. As well as this, the Site is also continued to be marketed.

Ongoing regeneration of the local environment and stimulation of the local economy would, it is considered, now be likely to derive the greatest benefit from the buildings on the Site becoming occupied at the earliest opportunity, regardless of whether this is for residential use. Given the widely varying character of development in this part of Twickenham, it is considered that the future occupier would be able to find equally or better suited premises elsewhere in the area should an occupier take up the premises before a suitable use comes forward.

These arguments are considered to be 'other appropriate evidence'. Having regard to such, it is considered that the particular circumstances of this Site, in terms of both physical and planning constraints, are such that the loss of the would be justified.

**Principle of residential:** Principle of residential Local Plan Policy LP32 relates to the Borough's targets for new homes. Local Plan Policy LP38 relates to loss of housing wherein there is a presumption that existing housing should be retained.

London Plan Policies H1 and H2 relate to increasing the housing supply and small sites. These policies set the general expectation for increasing housing supply, and expect a positive approach to small sites (below 0.25ha). Policy H2 supporting text para. 4.2.4 on incremental intensification states that existing residential areas with PTALs 3-6 or within 800m of a station or town centre boundary are expected to play an important role in contributing towards boroughs' housing targets as set out in Table 4.2 of the London Plan. This can take a number of forms, such as: new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision. These developments should generally be supported where they provide well-designed additional housing to meet London's needs.

An uplift in residential units is in principle welcome, subject to an acceptable impact on existing land uses and compliance with all other relevant policies.

As it stands, there is no in principle objection a residential use at first-floor, subject to the provision of further information demonstrating the viable use of the retained retail units at ground-floor.

**CREATE Planning**  
**21 June 2023**