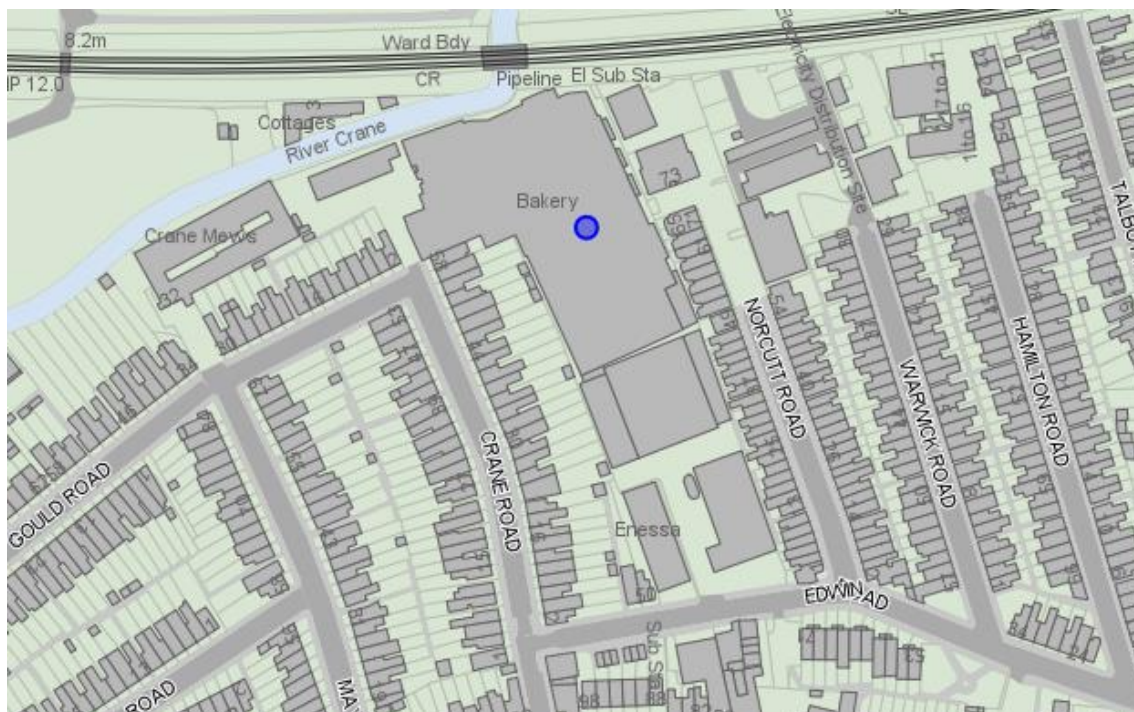


APPLICATION	19/0646/FUL
ADDRESS	Greggs Bakery and No.2, Gould Road, Twickenham, TW2 6RT
PROPOSAL	Demolition of existing buildings (with the retention of a single dwelling) and the redevelopment of the site to provide 116 no. residential units and 175sqm commercial floorspace (Use Class B1) with associated hard and soft landscaping, car parking, highways works and other associated works
APPLICANT	London Square
AGENT	DP9
CASE OFFICER	Thomas Faherty
APPLICATION RECEIVED	26th February 2019
WARD	South Twickenham

http://www2.richmond.gov.uk/plandata2/Planning_CaseNo.aspx?strCASENO=19/0646/FUL



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SUMMARY:

The site comprises an area of approximately 1.2ha and relates to the Greggs Bakery site, situated on the north west side of Edwin Road in South Twickenham Ward. The site currently has two access points, via Crane Road and Edwin Road.

The site is 'L-shaped' and is of a predominantly industrial use (Use Class B2) although the application site also includes no. 2 Gould Road, a two-storey end-of-terrace house. Greggs has ceased bakery use on the site but retains an operational presence. The site has a general building coverage of approximately 65% of the total site area and hard-standings. Buildings comprise mainly of one-to three-storey warehouses with brick or metal walls and metal or tiled roofs. The

River Crane directly borders the site to the north, other site boundaries adjoin residential properties.

The surrounding area is a mix of mainly older residential housing and some industrial sites. The area is subject to a number of significant site designations that include The River Crane Opportunity Area, Metropolitan Open Land (MOL), Public Open Space (POS) and an Other Site of Nature Importance (OSNI) to the north, Hamilton Road Conservation Area (CA72) to the east and Twickenham Green Conservation Area (CA9) to the south. The site itself is in a Key Office Area (Policy LP41), is designated as Locally Important Industrial Land and Business Park (Policy LP42) and also subject to an Article 4 Direction preventing conversion from office (Use Class B1) to residential (Use Class C3), The site is in an Archaeological Priority Area and is at a high risk of flooding. A full list of site designations is provided in Table 1 above.

The proposal seeks to demolish the existing buildings (with the retention of a single dwelling) and to enable a mixed-use residential-led development of the site, to provide 116 no. residential units (Use Class C3) and 175sqm flexible affordable office space (Use Class B1), to be let at 50% open-market value, with associated hard and soft landscaping, car parking, highways works and other associated works.

A new mews style residential street is proposed through the site with access from the existing entrances on Edwin Road and the corner of Gould Road and Crane Road, with 3 storey dwellings proposed to face either side of this street. Apartment style buildings are proposed near the northern side of the site, ranging between 3 and 5 storeys in height. Landscaping and playspace is proposed to front the river, and on-site parking spaces for 100 vehicles is proposed, with one space allocated to the proposed commercial space, and 228 cycle spaces. 1 accessible car club bay is also proposed on Edwin Road. 1 Proposed materials would be a variety of brick types and finished, with detailing in the form of stucco window reveals and cills, horizontal banding, engineering brick corners and decorative brick courses, gable ends on the street and a varied roofscape with roof accommodation and dormers.

With regards to Policy LP42, n areas designated as Locally Important Industrial Land and Business Park, any loss of industrial/employment space will be resisted unless appropriate replacement floorspace is provided on the site. The applicant has provided information to demonstrate that there is no longer a demand for such space and there is not likely to be in the foreseeable future. This included evidence of a full marketing exercise for two continuous years. Nonetheless, the application results in a significant loss of office and employment space and given the borough's very limited supply of industrial floorspace, it is considered critical that the existing stock of identified industrial premises of local importance are protected to meet local needs. The scheme therefore fails to comply with policies LP40 and LP42, and there is therefore an in-principle objection to the application with regards to the proposed residential land use.

With regards to the affordable housing provision, 46 units are proposed which would equate to 40% of all units on the site. The tenure mix has been agreed with the Council's Housing department and the Applicants are also willing to agree to an early and late-stage financial appraisal. As it stands, the provision of 46 units in accordance with the agreed tenure mix is secured by the Unilateral Undertaking however the legal mechanism needed to secure a financial appraisal require a bi-lateral agreement. The application hence cannot demonstrate that the proposed

scheme is achieving the maximum Affordable Housing provision and is also refused on this ground.

Regarding the character and design, the proposal would remove the current unsightly industrial buildings and result in a visual improvement across the site. It would result in the creation of a new 'mews' style street, whose design is considered to relate to the scale and grain of the local area. Overall heights are considered broadly acceptable in line with considerations outlined in the Twickenham Village Planning Guidance. The five-storey building to the north of the site would match the height of the proposed development at the neighbouring 'Norcutt House' and is not considered to have an unacceptable impact on the openness of the MOL or the character and appearance of adjacent Conservation Areas. The proposed treatments to the River Crane end of the site are welcome, as are the open views towards the riverside looking down the newly-created mews.

There are other improvements in relation to energy efficiency as well as additional planting and habitat enhancement proposed to the River Crane. In particular, the proposal involves the provision of rooftop PV panels, a riverside green buffer zone, green roofs, air source heat pumps, efficient mechanical ventilation, efficient lighting, and controlled heating. The development provides a 37% improvement on Building Regulations and provides an offset payment to meet zero carbon targets. BREEAM 'Excellent' is targeted for the affordable workspace. Electric car charging points are integrated into the proposal to ensure future-proofing.

On-site parking spaces for 100 vehicles are proposed to accommodate the 116 residential units, which amounts to 0.86 parking spaces per unit and a parking shortfall in relation to the Council's parking standards. However census data indicates that only 104 parking spaces would be required, a deficit of 4 spaces. Due to the 228 cycles provided on-site and the site's location close to a PTAL 3, it is considered that the parking deficit is acceptable in this instance.

In relation to connectivity to the Craneford Way playing fields to the north of the River Crane, whilst rights of way through the site, alongside the Riverwalk are secured and a safeguarding space for a new bridge across the Crane shown on the submitted drawings no bridge is specifically proposed nor any public access thereto.

The development would provide an acceptable standard of residential accommodation, and neighbour amenity to surrounding properties would be retained to an acceptable level in terms of sunlight/daylight, outlook, and overlooking.

A Unilateral Undertaking has been agreed with the applicant to mitigate other adverse impacts arising from the proposal, including financial contributions:

- 46 units of affordable housing;
- 175sqm of affordable office workspace;
- Contribution towards off-site playspace (£45,747 Indexed) for 5-11 year olds
- Contribution towards off-site playspace (£25,415 Indexed) for 12 year olds and over
- Playspace maintenance fees (£8,487 and £4,715);
- Contribution to public open space (£27,500)
- Payment towards Richmond's carbon offset fund (£122,075) and post-construction review;
- Contribution to Richmond's Air Quality Action Fund (14,100);
- Contribution towards in-river channel works (£50,000);

- **Local Employment Agreement for the construction process;**
- **Public right of way through the site to allow pedestrians and cyclists to access the riverside walkway;**
- **Restriction on resident access to car parking permits in the CPZ;**
- **Provision of 5 years of free car club membership to residents of the development.**
- **Provision of car club bay on Edwin Road**
- **Agreement of detailed layout and fit out of wheelchair accessible units with the Local Planning Authority**
- **Use of low-transmittance glass (or other light attenuation solution) to glazing facing the River Crane, details to be approved by Local Planning Authority**
- **Monitoring Fee (£13,670)**
- **Legal Fees (£2000)**

RECOMMENDATION: It is recommended the Planning Committee **REFUSES** planning permission for the reason outlined in Section 9 of this report.



Proposed Site Plan – roof level

1. REASON FOR PLANNING COMMITTEE DETERMINATION

- 1.1 The Council's Constitution does not give the Assistant Director of Environment & Community Services (Planning & Transport Strategy) delegated powers to determine the application in the way recommended; such decisions can only be made by the Planning Committee.

2. DESCRIPTION OF THE SITE AND ITS SURROUNDINGS

- 2.1 The proposal site relates to the Greggs Bakery site, situated on the north east side of Gould Road, Twickenham, TW2 6RT, in South Twickenham ward. The site is light industrial (B2 Use Class). Greggs have ceased bakery use on the site but retain an operational presence.

- 2.2 The site is approximately 2.7 acres with a general building coverage of approximately 65% of the total site area (1.84 acres) and hard-standings. Buildings comprise mainly warehouses, cold storage area, a large commercial oven, office and administrative buildings and plant material. Most of the warehouse buildings are tall single-storey with the office and administrative elements to the north east of the site being two and three storey buildings.
- 2.3 The surrounding area is residential in nature, comprising mainly two-storey hipped roof Victorian cottage-style terraces, with the exception of Crane Mews to the east, which is a collection of two-storey commercial studios, some of which have been converted into residential units.
- 2.4 The site is bounded by the River Crane and a railway line to the north. To the east of the site is Norcutt Road, a residential street of predominantly two-storey terraces is proposed. The rear sections of these properties border the site, as does the flank wall of Alcott House, which is a three-storey block of flats. These properties do not have rear gardens and instead have very modest back yards. To the south of the site runs Edwin Road, nos. 50 and 52 Edwin Road of which are situated at the south west corner of the site. To the west of the site is the flank of no. 2 Gould Road and the even properties of the dwellings on the eastern side of Crane Road, which are two-storey terraces with rear gardens.
- 2.5 The site is not listed and is not located within a conservation area. The boundary of Hamilton Road Conservation Area (CA72) is located approximately 50m to the east of the site. The nearest listed building is no. 74 Colne Road which is located approximately 70m south of the site.

SITE DESIGNATIONS:

Designation	Description
Archaeological Priority Area	Crane Valley
Article 4 Direction	B1 to C3 (West Twickenham Cluster) Basements
Buildings of Townscape Merit (BTMs)	None.
Community Infrastructure Levy (CIL) Band	Low
Conservation Areas	Hamilton Road CA72 (located to the east) Twickenham Green CA9 (located to the south)
Flood Zone	Flood Zone 2 (Fluvial) Flood Zone 3 (Fluvial)
Industrial Land / Business Park LP42	West Twickenham Cluster / Greggs Bakery and Surroundings: Status – Adopted
Key Office Area	West Twickenham Cluster / Greggs Bakery and Surroundings
Land Use Past Industrial	Gravel Pit 1890-1914 Electricity Works 1914-1920 Laundry 1930-1950 Tanks 1961-1962 Garage Services 1971
Listed Buildings	No. 74 Colne Road (located to south)
Metropolitan Open Land (MOL)	Crane Park East (located to the north)

Existing							
Proposed	115			12	1	1	100

	Cycle Parking Spaces (Long Stay)		Cycle Parking Spaces (Short Stay)	
	Resi	Commercial	Resi	Commercial
Existing				
Proposed	216	6	4	2

Table 5

3. DESCRIPTION OF THE PROPOSAL AND ANY RELEVANT PLANNING HISTORY

- 3.1 The applicant seeks planning permission for the demolition of existing buildings on the site (with retention of a single dwelling at No. 2 Gould Road) and redevelopment of the site to provide up to 116 residential units and 175sq.m of flexible commercial floorspace.
- 3.2 A new mews style residential street is proposed through the site with access from the existing entrances on Edwin Road and the corner of Gould Road and Crane Road, with 3 storey dwellings proposed to face either side of this street. Apartment style buildings are proposed near the northern side of the site, ranging between 3 and 5 storeys in height.
- 3.3 Dwellings would comprise of a mixture of townhouses and flats. 40% of the residential units would be on-site affordable, Overall the dwellings would range between one, two, three and four bedroomed units, and the majority of the apartments would have private balconies. The affordable units are provided as affordable rent, intermediate rent and shared ownership units. All homes are Part M4(2) compliant with all apartment buildings accessible via a level threshold and a lift ensuring accessibility for all and suitability for lifetime occupation. Two M4(3) compliant wheelchair accessible units are also proposed.
- 3.4 The scheme provides 175sqm of affordable workspace (Class B1), provided at 50% of market rent, with a view to benefitting local small businesses. This provision is anticipated to create approximately 18 full time jobs.
- 3.5 The scheme proposes landscaping and playspace fronting the river, and on-site parking spaces for 100 vehicles is proposed, with one space allocated to the proposed commercial space. 228 cycle spaces are proposed, comprising 216 long stay residential spaces, 6 long stay commercial spaces, 4 short stay residential spaces, and 2 short stay commercial spaces.

Relevant Planning history:

- 08/3145/FUL – Erection of a betta absorptive noise barrier to the rear of 20-22 Crane Road, Twickenham – Approved 14/11/2008
- 85/1756 – The erection of noise baffle sidewall sheeting and roof to covered van closing area together with screen – Approved 13/02/1986
- 84/0871 – Retention of two portable buildings, one for use as office and one as a store – Refused 19/02/1985
- 82/0536 – Erection of a first floor extension to existing office building to provide additional ancillary office accommodation – Refused 26/10/1982

- 81/0893 – Erection of a single storey building to provide ancillary office accommodation. (Revised Drawing No. 869/120 Rev. B) – Approved 14/10/1981
- 79/1158 – Erection of a two storey building to provide ancillary office accommodation – Approved 08/01/1980
- 79/1153 – Erection of a building to house flour storage silos – Approved 08/01/1980
- 77/1161 – Erection of new escape staircase – Approved 17/01/1978
- 72/0899 – Demolition of existing cold store building and erection of new single-storey cold store building at rear of existing factory buildings – Approved 06/02/1973
- 71/0005 – Erection of covered van loading area – Approved 16/02/1971
- 70/1198 – Erection of covered van loading area – Refused 18/11/1970
- 69/1623 – Installation of new petrol pump and resiting of diesel pump and underground storage tanks – Approved 10/10/1969
- 69/1567 - Erection of vehicle washing canopy – Approved 08/10/1969
- 68/2313 – Erection of vehicle washing canopy – Approved 07/02/1969
- 68/1992 – Installation of underground diesel oil storage tank and pump – Approved 05/11/1968
- 67/2464 – Construction of petrol storage tank and installation of petrol pump – Approved 26/02/1968
- 66/2337 – Installation of 1,000 gallon overground diesel storage tank – Approved 20/07/1966
- 62/1320 – Extension to form despatch bay – Approved 04/02/1963
- 62/0854 – Erection and extensions to despatch bay for bakery – Refused 08/11/1962
- 62/0557 – Continuation of use of hardstanding for vehicles – Approved 13/07/1962
- 62/0231B – Erection of a boiler house extension at the rear – Approved 02/05/1962
- 62/0231A – Erection of building for short-term storage of unsold bakery products – Approved 02/05/1962
- 61/0295 – Continued use for vehicle hardstanding – Approved 03/07/1961
- 61/0159 – Extension to existing bakery

4 DEVELOPMENT PLAN

4.1 The main development plan policies applying to the site are (not exhaustive):

National Planning Policy Framework (NPPF) (2018)

National Planning Policy Guidance (NPPG) (2018)

Draft London Plan (Intend to publish 2020)

- D1 London's form and characteristics
- D2 Delivering Good Design
- D3 Inclusive Design
- D4 Housing Quality and Standards
- D5 Accessible Housing
- D6 Optimising Housing Density
- G1 Green Infrastructure
- G4 Local green space and open space
- G6 Biodiversity and access to nature
- G7 Trees and woodlands

- H1 Increasing housing supply
- H7 Affordable housing tenure
- H12 Housing Size Mix
- H13 Build to Rent
- S1 Improving air quality
- S2 Minimising greenhouse gas emissions
- S3 Energy Infrastructure
- S5 Water Infrastructure
- S12 Flood risk management
- S13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking

Greater London Authority (GLA) Supplementary Planning Guidance (SPG):

- Accessible London: Achieving an Inclusive Environment (October 2014)
- Affordable Housing and Viability SPG (August 2017)
- Character and Context (June 2014)
- Housing SPG (March 2016)
- Industrial Land Demand Study (2017)
- Industrial Land Supply and Economy Study (2015)
- Land for Industry and Transport SPG (September 2012)
- London Planning Statement (May 2014)
- Social Infrastructure SPG (May 2015)
- Sustainable Design and Construction (April 2014)
- The Control of Dust and Emissions During Construction and Demolition (July 2014)

Local Plan (2018):

- Strategic Vision 1 Protecting Local Character
- Strategic Vision 2 A Sustainable Future
- Strategic Vision 3 Meeting People's Needs
- Policy LP1 Local Character and Design Quality
- Policy LP2 Building Heights
- Policy LP3 Designated Heritage Assets
- Policy LP8 Amenity and Living Conditions
- Policy LP10 Local Environmental Impacts, Pollution and Land Contamination
- Policy LP15 Biodiversity
- Policy LP16 Trees, Woodlands and Landscape
- Policy LP17 Green Roofs and Walls
- Policy LP20 Climate Change Adaption
- Policy LP21 Flood Risk and Sustainable Drainage
- Policy LP22 Sustainable Design and Construction
- Policy LP23 Water Resources and Infrastructure
- Policy LP24 Waste Management
- Policy LP28 Social and Community Infrastructure
- Policy LP29 Education and Training
- Policy LP30 Health and Wellbeing
- Policy LP35 Housing Mix and Standards
- Policy LP36 Affordable Housing

- Policy LP37 Housing Needs of Different Groups
- Policy LP39 Infill, Backland and Back Garden Development
- Policy LP40 Employment and Local Economy
- Policy LP41 Offices
- Policy LP42 Industrial Land and Business Parks
- Policy LP44 Sustainable Travel Choices
- Policy LP45 Parking Standards and Servicing
- Appendix 5 – Marketing Requirements

4.2 The Local Plan policies can be found at:

https://www.richmond.gov.uk/media/15935/adopted_local_plan_interim.pdf

5. MATERIAL PLANNING CONSIDERATIONS

National Planning Policy Framework (NPPF) (2019)

Supplementary Planning Documents

- Air Quality SPD (June 2020)
- Affordable Housing SPG (March 2014)
- Buildings of Townscape Merit SPD (May 2015)
- Car Club Strategy SPD (2006)
- Contaminated Land (2003)
- Design Quality SPD (February 2006)
- Front Garden and Other Off-Street Parking Standards (September 2006)
- Hamilton Road Conservation Area (CA72) Statement
- Twickenham Village Planning Guidance SPD (January 2018)
- Planning Obligations in conjunction with Borough Community Infrastructure Levy [CIL] (2014)
- Refuse and Recycling Storage Requirements SPD (2015)
- Residential Development Standards SPD (2010)
- Security by Design (2002)
- Small and Medium Housing Sites SPD (2006)
- Sustainable Construction Checklist Guidance Document SPD (January 2016)
- Trees: landscape design, planting and care SPG (November 1999)
- Trees: legislation and procedure SPG (November 1999)

More information on these documents can be found at:

https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/supplementary_planning_documents_and_guidance

Other Local Strategies or Publications

DCLG/Department of Transport – Manual for Streets

6. CONSULTATIONS CARRIED OUT

6.1 Neighbouring properties to the site were notified of the application, a statutory notice advertising the application was posted at the site, and the application was advertised in a local newspaper.

6.2 101 letters of **objection**, 13 letters of **observation**, and 4 letters of **support** were received (multiple letters from 1 address counted as 1 single objection). Below

are separate tables for objection and support comments and the officer's response.

Objections

Neighbour comment	Officer response
<i>Character and design</i>	
Site would be cramped and overdeveloped	These comments are addressed in the Character/design section of the forthcoming report.
Over-intensification	
Out of character with the area due to scale	
Out of character with the area due to materials and style of buildings	
5 storey building out of character with surrounding residential buildings which are 3 storeys maximum (contradicts LP2 of the Local Plan)	
Surrounding area predominately 2 storey Victorian terraces	
The proposed medium-high density development is not in keeping with the surrounding low-medium density nature of the existing suburban environment	
Crane Mews does not adequately represent to the character of the area and is not a good example of planning which should be repeated	
The proposal would spoil views from Richmond Hill and thus contravenes Open Spaces Act 1902	
Roof top gardens are out of keeping with the area	
High rise 5 storey blocks may set a precedent in the area	
<i>Neighbour amenity</i>	
Noise pollution	These comments are addressed in the Neighbour amenity section of the forthcoming report.
Overlooking/loss of privacy (especially from 5 storey building due to balconies and roof gardens)	
Visual intrusion	
Loss of light to neighbouring gardens and other habitable spaces	

Development positioned too close to adjoining properties fronting Crane Road	
Excessive bulk and massing in relation to properties at 4, 6, 8, 10 and 12 Gould Road, impacting their outlook and visual amenity	
Residents' concerns have not been addressed following the applicant's public consultation	
Bin and bicycle store hard up to boundary with No. 4 Gould Road would cause impact in terms of noise, smells, light pollution and general disturbance	
Unneighbourly form of development	
BRE guidelines are not fully adhered to for properties at 4, 6, 8, 10 and 12 Gould Road	
Light pollution from security and safety lighting by the proposed cycle/bin storage at No. 2 Gould Road	
<i>External amenity on site</i>	These comments are addressed in the Housing section of the forthcoming report.
Lack of community space	
Lack of external amenity space	
No link to Crane footpaths	
Lack of playspace for children (contrary to Policy LP31)	
Lack of outdoor amenity space in the surrounding area (closest is Kneller Gardens which are 10 minutes walk away)	
Proposal will result in cramped and unhealthy living conditions	
No need for bridge to linking new walkway to north bank of river	
Gating access to River Crane	
The proposal should have a community garden to help promote social networking and health benefits	
The rear gardens of the houses in Block G are very small and out of keeping with the size of gardens in the surrounding area	

<i>Transport/parking</i>	
Traffic generation due to scale of development/number of dwellings	These comments are addressed in the Transport/parking section of the forthcoming report.
Impact on highway safety	
Pollution due to traffic	
No Healthy Streets assessment as required by TFL	
Construction traffic	
Lack of off-street parking	
1 parking space per dwelling is unrealistic	
Insufficient cycle parking facilities	
Congestion caused as there will only be 2 points of access to the site	
The CPZ is not 24/7 and residents will be able to use car parks in the surrounding streets after 6.30pm	
Surrounding residential roads are too narrow to accommodate large lorries and delivery vehicles	
Sharp angle on surrounding roads including Edwin/Crane Road and Gould Road/Crane Road will be difficult for larger construction/delivery vehicles to negotiate	
Residents of proposed development may have access to CPZ in future, reducing parking available to residents in the area	
No provision of visitor parking	
Insufficient parking allocated to proposed commercial premises (1 space for premises)	
Inadequate space for loading and turning on site	
Lack of parking available for residents will put pressure on the already congested public transport options within proximity of the site	
Visitors of residents from within the borough will be able to use their visitor permits to park in the surrounding streets despite there being a CPZ	
The applicant's swept path analysis shows vehicles entering/exiting through existing parking spaces on Gould Road and Crane Road	

Insufficient access for emergency vehicles	
Safety concerns resulting from additional traffic	
Poor pedestrian access to the site	
Over-subscription of parking – many other developments around London are car free	
Lack of charging points for electric vehicles	
<i>Affordable housing</i>	
The provision of affordable housing falls below the Council target of 50%	These comments are addressed in the Affordable housing section of the forthcoming report.
Collier's Financial Viability Assessment proposed only 101 residential units on the site and this was found to be a viable option, therefore total number of units should be reduced	
<i>Ecology/biodiversity</i>	
Only a token contribution to the ecology/biodiversity of the area	These comments are addressed in the Ecology/biodiversity section of the forthcoming report.
Overshadowing of river corridor	
Light pollution on river corridor	
Noise pollution into river corridor	
Increase of litter into river corridor	
Further surveys for bats and nesting birds should be undertaken	
Financial contribution should be made towards benefitting the river	
<i>Principle of development</i>	
Development represents a token nod to a mixed land use	This comment is addressed in the Principle of development section of the forthcoming report.
Development is too intensive in terms of the number of dwellings	
No benefit to local community	
<i>Sustainability</i>	
The buildings are designed to show a 35% reduction in carbon emissions over building regulations, however the London	

Plan seeks zero carbon residential properties	This comment is addressed in the Sustainability section of the forthcoming report.
The proposal misses an opportunity to be more proactive in terms of sustainability by planning for future higher sustainability standards and resulting savings	
<i>Other</i>	
Lack of detail/accuracy in submitted drawings	The submitted drawings satisfy the local validation checklist and therefore the applicant is not required to submit further details in their drawings.
Drawings depicting existing buildings in Crane Mews and on the application site are misleading in what buildings actually exist	
Disruption due to construction	This is generally controlled by conditions to the planning application to ensure construction is controlled
Global warming due to manufacture of concrete – this should not be used in the development	Matters relating to sustainability will be addressed in the Sustainability section of the forthcoming report.
Strain on local sewerage system due to over-intensification	This would be dealt with at the building regulations stage
Reports refer to the previous design of the Block G, not the current design	Design and Access Statement has since been updated
Application will add pressure on already over-subscribed schools, GP services, refuse collections and sports facilities in the area	This is not a relevant planning consideration and therefore this has not been assessed in the forthcoming report.
The application is simply a money-making scheme for the developers	This is not a relevant planning consideration and therefore this has not been assessed in the forthcoming report.
No commitment to providing sufficient boundary fences	Details of boundary fences are generally conditioned as part of any planning permission.
Damage to party wall adjoining development	This is a private matter between the 2 parties rather than a planning matter.
Council advised to liaise closely with Thames Eater to assess the flow and pressure of the water supply to existing residential properties surrounding the site	The Council have consulted Thames Water for their comments on the development.
Safe disposal of hazardous materials	This is generally controlled by conditions to the planning application relating to the submission of a Construction Management Plan
Crime resulting from high density development/affordable housing	These are not relevant planning considerations.
CCTV should be provided	

Support comments

Neighbour comment	Officer response
<i>Character and design</i>	
The general aesthetics and mews style design are appreciated	These comments are addressed in the Character/design section of the forthcoming report.
<i>Principle of development</i>	
The concept of redeveloping the site in general is supported	This comment is addressed in the Principle of development section of the forthcoming report.
The removal of a derelict factory	
The introduction of some commercial space	

Amendments:

6.3 Following extensive discussions with the Council the applicant agreed to make the following revisions to the application:

- A reduction in the total number of parking spaces by 15 from 115 to 100.
- Further development of the river edge guarding to increase soft landscaping and reduce light spill to the river.
- Safeguarding of future bridge landing point.
- Changes to the massing of the proposed development at the junction of Gould Road and Crane Road and removal of communal roof terrace.
- Amendment to the roof form of Building F.
- Changes to housing mix as following:

<i>Planning submission mix</i>	<i>Revised mix</i>
32 x 1 bed (28%)	32 x 1 bed (28%)
34 x 2 bed (29%)	34 x 2 bed (29%)
38 x 3 bed (33%)	46 x 3 bed (40%)
11 x4 bed (9%)	4 x4 bed (3%)

- Increased size in rear gardens to some properties.
- Change to rear of some houses to reduce impact on adjoining houses.
- Relocating substation to standalone building.

6.4 Following these amendments the application was then re-advertised. A further 88 letters of **objection**, 4 letters of **observation**, and 5 letters of **support** were received (multiple letters from 1 address counted as 1 single objection). The reasons are summarised below:

Objections

Neighbour comment	Officer response
<i>Character and design</i>	
No reduction in size and density of development	These comments are addressed in the Character/design section of the forthcoming report.
Site would be overdeveloped	
No attempt has been made to improve the visual amenity of the commercial building	
Over-intensification	
Out of character with the area due to scale	
Out of character with the area due to materials and style of buildings	
Proposal will result in an eyesore	
5 storey building out of character with surrounding residential buildings which are 3 storeys maximum	
Surrounding area predominately 2 storey Victorian terraces	
<i>Neighbour amenity</i>	
Noise pollution	These comments are addressed in the Neighbour amenity section of the forthcoming report.
Overlooking/loss of privacy due to taller buildings	
Overlooking of properties at Mereway Cottages and Crane Mews due to proposed bridge	
Visually intrusive/overpowering	
Sense of enclosure	
Loss of light	
Amendments to Blocks F and G are minimal	
Excessive bulk and massing has not been addressed in relation to properties at 4, 6, 8, 10 and 12 Gould Road, impacting their outlook and visual amenity	
<i>External amenity on site</i>	
Lack of community space	These comments are addressed in the Housing section of the forthcoming report.
Lack of external amenity space	

Lack of access to Crane footpaths	
Lack of playspace for children	
Limited access to surrounding parks such as Kneller Gardens	
No need to provide play areas or community space – this area should be used for parking for residents	
The proposed future bridge must be completed prior to the occupation of the first residential units on the site	
The bridge should also be for the use of vehicular traffic in order to ameliorate the increase in traffic on surrounding streets	
Failure to properly open up the River Crane corridor	
Some of the proposed rear gardens remain very small	
<i>Transport/parking</i>	
Traffic generation due to scale of development/number of dwellings	These comments are addressed in the Transport/parking section of the forthcoming report.
Impact on highway safety	
No allowance to improve safety for cyclists in surrounding roads which are part of the local cycle network	
Pollution due to traffic	
Carpark management plan not sufficient not sufficient unless the Council is willing to support this	
Construction traffic	
Further reduction in off-street parking will impact on parking availability in surrounding streets	
Less than 1 parking space per dwelling is unrealistic and will place too much pressure on on-street parking on surrounding roads	
Nothing has changes with regard to traffic flow, access, road safety or pollution	
The removal of a further 15 car parking space and lack of visitor parking will result in an increased use of nearby parking, including pay and display	

Inadequate vehicle tracking submitted – larger vehicles appear to overrun houses	
Insufficient cycle parking facilities	
Congestion caused as there will only be 2 points of access to the site	
Surrounding residential roads are too narrow to accommodate large lorries and delivery vehicles	
Volume of construction/delivery vehicles will result in congestion on surrounding roads	
Residents of proposed development may have access to CPZ in future, reducing parking available to residents in the area	
There is still no provision of visitor parking	
No parking provision for delivery vehicles	
Increased pressure on local public transport services	
Inadequate space for loading and turning on site	
The CPZ is not 24/7 and residents will be able to use car parks in the surrounding streets after 6.30pm	
Safety concerns resulting from additional traffic	
Excessive number of parking spaces – more parking should be removed to bring application in line with new national guidelines	
Lack of charging points for electric vehicles	There is no requirement for charging points under current planning policies.
Construction Management and Construction Logistics Plans required	These are typically conditioned as part of any planning permission.
<i>Affordable housing</i>	
The provision of affordable housing falls below the Council target of 50%	These comments are addressed in the Affordable housing section of the forthcoming report.
<i>Ecology/biodiversity</i>	
Overshadowing of river corridor remains	These comments are addressed in the Ecology/biodiversity section of the forthcoming report.
Light pollution on river corridor remains	

Lack of native species of planting proposed	
Further surveys for bats and nesting birds still need to be undertaken	
Lack of landscaped areas on site	
<i>Principle of development</i>	
No benefit to local community	This comment is addressed in the Principle of development section of the forthcoming report.
Development is too intensive in terms of the number of dwellings	
Alternative use assessment appears to contradict the marketing report which dismisses the potential of commercial use on the site	
<i>Sustainability</i>	
Environmental impacts of proposal	This comment is addressed in the Sustainability section of the forthcoming report.
More trees are needed near the river	
No solar panels shown on the submitted plans	This is typically conditioned as part of any planning permission.
<i>Other</i>	
Amendments to the proposed scheme are token gestures which are minimal and entirely inadequate	This will be addressed throughout the forthcoming report.
Failure to follow relevant planning policies	This will be addressed throughout the forthcoming report.
Potential health impacts due to asbestos in the roof of the existing buildings to be demolished	This is not a relevant planning consideration and therefore this has not been assessed in the forthcoming report.
Disruption due to construction	This is generally controlled by conditions to the planning application to ensure construction is controlled
Strain on local sewerage system due to over-intensification	This would be dealt with at the building regulations stage
Application will add pressure on already over-subscribed schools, GP services, refuse collections and sports facilities in the area	This is not a relevant planning consideration and therefore this has not been assessed in the forthcoming report.
The application is simply a money-making scheme for the developers	This is not a relevant planning consideration and therefore this has not been assessed in the forthcoming report.

Support comments

Neighbour comment	Officer response
<i>Character and design</i>	
The proposal provides good quality, well designed housing, including affordable units	These comments are addressed in the Character/design section of the forthcoming report.
<i>Principle of development</i>	
The concept of redeveloping the site in general is supported	This comment is addressed in the Principle of development section of the forthcoming report.
<i>External amenity on site</i>	
There is more than adequate provision of playspace for the site considering that Kneller Gardens and Craneford Way Playing fields are located within close proximity of the site	These comments are addressed in the Housing section of the forthcoming report.
<i>Ecology/biodiversity</i>	
Bespoke sensitive lighting strategy welcomed	These comments are addressed in the Ecology/biodiversity section of the forthcoming report.
<i>Sustainability</i>	
The area is well served by public transport and the scheme has less emphasis on car ownership, helping to address the Climate Emergency	These comments are addressed in the Sustainability section of the forthcoming report.
<i>Other</i>	
Previous concerns regarding proposal have been resolved	N/A
The crossing over the River Crane is a positive aspect of the proposal	N/A

6.4 Final amendments to the application were submitted as follows:

- Further increase to soft landscaping in the riverside buffer zone including removal of 15 parking spaces and reduced light spill to both the naturalised buffer zone and the river.

- Removal of balconies to west elevation of Block F.
- New balustrading to first, second and third floor roof terrace to limit the accessible area to residents of flats F-1-5, F-1-6, F-2-5, F-2-6, F-3-5 and F-3-6.
- Introduction of oriole style windows to south elevation of Building E.
- Additional solar PV panels to proposed roof space throughout site.
- Changes to Council nominated units to bring them in line with the requirement of Part M4(3) of the Building Regulations.
- Two private sale flats switched to affordable units
- Changes to the tenure mix of affordable housing as follows:

	Residential Type	No. of bedrooms per unit						Total Habitable Rooms
		Studio	1	2	3	4	Total	
Existing	Private/Market			1			1	
Proposed On-Site	Affordable Rent		5	8	2	0	15	43
	Intermediate residential				2		2	8
	Shared Ownership		15	14	0		29	72
	Private/Market		12	12	4	4	70	265
	Total		32	34	46	4	116	388

	Residential Type	No. of bedrooms per unit						Total Habitable Rooms
		Studio	1	2	3	4	Total	
Existing	Private/Market			1			1	4
Proposed On-Site	Affordable Rent		5	8	2	0	15	43
	Intermediate residential				2		2	8
	Shared Ownership		15	14	0		29	72
	Private/Market		12	12	4	4	69	265
	Total		32	34	46	4	116	388

- Changes to car parking amounts as follows:

	Car Parking Spaces (General)			Car Parking Spaces (Blue Badge)			% EVCP
	Resi	Commercial	Visitor	Resi	Commercial	Visitor	
Existing							
Proposed	100	1		12	1		100

	Cycle Parking Spaces (Long Stay)		Cycle Parking Spaces (Short Stay)	
	Resi	Commercial	Resi	Commercial
Existing				
Proposed	216	6	4	2

6.5 Due to the minor nature of these amendments, it was not considered necessary to re-consult public a second time. However, it is noted that one further comment was received in support of the proposal by the Richmond Housing Partnership. Their comments are summarised below:

- The design of these homes looks is supported, and the mix and layout of the units will be acceptable.
- The tenure mix of 15 London Affordable Rent, 29 Shared Ownership and 2 London Living Rent is supported.
- It is assumed that two-thirds of the Shared Ownership homes should be affordable to households with an income of less than £47,000 as per Richmond's policy.

Statutory Consultee responses

6.6 Both internal and external consultations were undertaken as part of the Council's review of the application. The following tables summarise the responses:

External consultees	Response
Environment Agency	No objection following amendments,
Greater London Archaeological Advisory Service (GLAAS)	No objection.
Climate Integrated Solutions	No objection following amendments, subject to Unilateral Undertaking securing Carbon Off-Set Contribution and Post-construction review and conditions requiring application to be carried out in accordance with approved sustainability documents

Internal consultees	Response
Air Quality Officer	No objection subject to payment towards the Council's Air Quality Action Fund being secured via a legal agreement.
Environmental Health (contamination)	No objection subject to standard Contaminated Land Condition DV29F being attached to any approval.

Environmental Health (noise)	No objection following review of acoustic report titled Environmental Noise Survey and Limiting Plant Noise Levels dated February 2019.
Highways (transport)	No objection following amendments, subject to unilateral undertaking clauses surrounding restriction on CPZ parking permits, car club membership, highway works at the access points and provision of new car club bay on Edwin Road, Traffic Management Orders,
Urban Design	No objection following amendments, subject to conditions for materials, fenestration, green roofs, solar PV panels, landscaping and lighting.
Ecology	No objection following amendments to proposal, subject to unilateral undertaking securing low level lighting beside river crane and contributions towards river restoration, children's playspace and public open space .
Policy (employment)	Objection to loss of employment on the site. Wholly insufficient replacement employment floorspace proposed.
Policy (housing)	No objections following amendments to affordable housing number and tenure mix bring it up to 40% on site plus early/late stage viability reviews. Also confirmed agreement following amendments to create M4(3) compatible units. All need to be secured via legal agreement.

7. EXPLANATION OF OFFICER RECOMMENDATION

7.1 The main planning considerations for this application are assessed as:

- i. Principle of development
- ii. Affordable Housing
- iii. Housing
- iv. Design, Massing and Layout
- v. Impact on existing residential amenity
- vi. Parking and transport considerations
- vii. Sustainability and renewable energy targets

- viii. Air quality
- ix. Flood risk and drainage
- x. Land contamination
- xi. Ecology, Biodiversity and Trees
- xii. Archaeology

(i) Principle of Development

Loss of employment space

- 7.2 The lawful use of the site is B2 (general industrial) with ancillary offices. The proposal is for a predominately residential scheme including 116 residential units, however it does include 175sqm of commercial floor space. The loss of employment space must first of all be addressed.
- 7.3 The Mayor of London's Land for Industry and Transport SPG (2012) states that the Council should ensure a 'restrictive' approach towards the transfer of industrial land to other uses until 2031, which means that industrial land should not be released for other uses. Further to this, the GLA's Industrial Land Supply and Economy Study (2015) demonstrates that the Borough has a very limited supply of industrial land, with only 17.3ha of general and light industrial space (B2 and B1c Use Classes) and 8.1ha of warehousing and storage (B8 Use Class). This is amongst the lowest of all the London boroughs.
- 7.4 Paragraph 4.12 of the LBRuT Employment Sites and Premises Study 2017 Update states that the update study has shown that a sector analysis using forecast employment data supports the view that release of employment land is no longer the appropriate policy response and what industrial land is left in Richmond needs to be retained, and new land identified to provide premises for the modest growth in employment floorspace recognised in the forecasts.
- 7.4 In addition, the Greater London Authority's (GLA's) Industrial Land Supply and Economy Study (2015) demonstrates that the Borough has a very limited supply of industrial land, with only 17.3 hectares of general light and industrial space (B2 and B1c), and 8.1 hectares of warehousing and storage (B8) facilities. This is amongst the lowest of all the London Boroughs. Moreover, the GLA has recently published the London-wide Industrial Land Demand Study (2017). As was the case with the GLA's Industrial Land Supply and Economy Study (2015), this study continues to evidence significant demand for the Borough's employment land requirements of +12 hectares. The Borough's industrial vacancy rate stands at only 1.8% (whereas the report considers 8% to be healthy). The Council therefore takes the position that this demonstrates the importance of safeguarding existing industrial land within the Borough. Furthermore, The Mayor of London's Land for Industry and Transport SPG (2012) states that the Council should ensure a 'restrictive' approach towards the transfer of industrial land to other uses until 2031, which means that industrial land should not be released for other uses. Given the findings of the above-mentioned GLA reports, it is expected that the 'restrictive transfer' approach will be retained within the next London Plan. Therefore, there is a presumption against loss of any industrial or other such employment space in all parts of the Borough, and any loss will be strongly resisted in Listed Important Industrial Land and Business Parks. It is this evidence that informed the Local Plan policies relating to industrial and employment land, which were formally adopted by the Council 16/05/2018.

- 7.5 Furthermore, it is noted that Colliers International, on behalf of Greggs Plc, submitted representations as part of the Local Plan consultation, objecting to the locally important industrial land and business park designation on the alleged grounds that the site is significantly constrained, unattractive to industrial occupiers, incompatible with the surrounding residential area due to noise, smells and traffic, industrial redevelopment would be restricted by an emerging Controlled Parking Zone (CPZ) and an alleged missed opportunity to provide a location for Small and Medium-sized Enterprises (SMEs) and start-ups. All of the Publication responses to the Local Plan were submitted for consideration by the Inspector.
- 7.6 In its public response to the comments, the Council stated that it considered that the evidence regarding protection of employment floorspace to be both robust and up-to-date, and that the policy approach set out in LP42 was sound. The Local Plan has since been adopted, which the Inspector found to be sound, and the designation of the Greggs site as a locally important industrial land and business park was retained, thus demonstrating the Inspector's agreement that the industrial use of the site should be protected.
- 7.7 Policy LP40 of the Local Plan states 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 space 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 employment floorspace. The inclusion of residential use within mixed-use schemes will not be appropriate where it would adversely impact on the continued operation of other established employment uses within that site or on neighbouring sites.
- 7.8 The borough has a significant local economy, with a high proportion of small businesses serving local residents and other local businesses. It is therefore vital in terms of local economic and environmental sustainability objectives to protect and enhance this provision. However, the Council's updated Employment Land Study indicates that a lack of sufficient employment floorspace provision is a constraint on future employment and business growth in the borough. Therefore, there is a presumption against the release of any employment land or stock (office, industrial and storage floorspace) to other uses.
- 7.9 A sustainable borough is also one that has a large range of local employment opportunities for its residents and where all residents have access to those opportunities and other services without the need to travel far, or which are accessible by sustainable forms of transport. Therefore, it is important that employment land is retained close to residential areas to provide a choice of employment opportunities within the borough now and in the future to help maintain Richmond upon Thames as a borough where both economic and social well-being is high.
- 7.10 The site is designated an Industrial Land and Business Park. Policy LP42 is therefore relevant. This states that the borough has a very limited supply of

industrial floorspace and demand for this type of land is high. The Council will therefore protect and where possible enhance the existing stock of industrial premises to meet local needs. LP42(B) states that the Council has identified locally important industrial land and business parks. In these areas:

- a) loss of industrial floorspace will be resisted unless full, on site replacement floorspace is provided;
- b) development of new industrial floorspace and improvement and expansion of existing premises is encouraged; and
- c) proposals for non-industrial uses will be resisted where the introduction of such uses would have an adverse impact on the continued operation of the existing services.

7.11 There is therefore a presumption against the loss of industrial/employment floor space in all parts of the borough, and any loss will be particularly strongly resisted in the listed important industrial land and business parks, as this space provides valuable employment opportunities and can encourage creativity and entrepreneurialism. Local service trades such as builders or car repair garages provide useful services to residents and other businesses in the borough as well as a source of local employment opportunities. Small firms such as these and start-up businesses require cheaper accommodation and small incubator units, but often find it difficult to acquire suitable affordable premises as the higher value of land for other uses creates pressure for redevelopment for higher quality and priced accommodation. It is therefore important to retain a diverse range of different types and sizes of industrial spaces across the borough.

7.12 In the borough context it is common for employment, particularly industrial sites, to be within established mixed-use or residential areas, because of historic development patterns. This does not provide justification for a change of use, as mitigation can address impacts and constraints such as narrow access, which have been managed by existing occupiers, and therefore do not prevent any future or continued employment use.

7.13 In the locally important industrial land and business parks, loss of industrial space will be strongly resisted unless appropriate replacement provision is provided. Appropriateness will be determined with particular regard to site circumstances and the industrial/employment needs of the borough. It should not be interpreted as a like for like replacement in the nature of the use or its scale. New appropriate industrial, storage and distribution development, as well as improvement and expansion of such premises, is encouraged in these areas, particularly B2, B8 and B1(c) floorspace. Proposals for non-industrial uses will be resisted unless the proposed uses are ancillary to the principal industrial use on the site.

7.14 LP42(A) states that there is a presumption against loss of industrial land in all parts of the Borough. Loss of industrial space (outside of the locally important industrial land and business parks) will only be permitted where:

1. Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an industrial- based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of a completion of a full and proper marketing exercise of the site at realistic prices both for the existing use or an alternative industrial use completed over a minimum period of two continuous years in accordance with the approach set out in Appendix 5 of the Local Plan; and then
2. A sequential approach to redevelopment or change of use is applied as

follows:

- a) redevelopment for office or alternative employment uses;
- b) mixed-use including other employment generating or community uses, and residential providing it does not adversely impact on the other uses and maximises the amount of affordable housing delivered as part of the mix.

- 7.15 However, as the site is a locally important industrial land and business park, there is a presumption against the loss of industrial floorspace and Criteria 1 and 2 of LP42(A) do not apply.
- 7.16 The Council's policy approach is backed by the London Plan (Policy 4.4 a rigorous approach to industrial land management, with the borough identified as restrictive transfer). Further, the GLA Industrial intensification and co-location study illustrates potential approaches to industrial intensification and co-location. While of limited weight (until the final version of the Plan is known), the draft London Plan further advocates introducing residential to support intensification of employment (Policy E7 intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing) (the residential element is expected to subsidise the redevelopment of the employment offer). It is worth noting that the Panel of Inspectors' report (published in October 2019) considers that the Plan should provide a more positive strategic framework for the provision of industrial capacity in London and that a further review should be undertaken of the borough categorisations to provide capacity, retain capacity, or manage limited release. Indeed, the report states that "there is likely to be a need, in quantitative terms, for more industrial land to meet future demand over the plan period to 2041 than assumed in the Plan". The Inspectors are recommending that the London Plan should be strengthened to make it clear that a sufficient supply of industrial land and premises should be provided as well as maintained, and that the Mayor should give further consideration to the categorisations of the boroughs, although they are unable to provide greater specificity about which particular boroughs' categorisation may need to be changed. Finally, the Inspectors also recommend further strengthening and protection of non-designated industrial sites, which make up over a third of all industrial land.
- 7.17 The Council evidence suggests industrial development is viable (which informed the Local Plan). The SLP Industrial and Business Land Study (Ramidus) 2018 identified in industrial and employment premises an acute shortage of small (100-200 sqm, or 1-2,000 sq ft) light industrial units, which has led to recent sharp rises in rents – which has led to increased institutional investment in industrial and employment land, which, in the medium to longer term will encourage redevelopment and refurbishment of older estates.
- 7.18 Marketing has been undertaken by Colliers Logistics and Industrial Department. According to the Colliers Marketing Report the site was marketed as warehouse / industrial buildings. It did not include flexible, alternative employment generating uses to satisfy the sequential approach (despite the Employment Summary Note stating at paragraph 4.9 it has invited offers for "all uses" this is not set out in the evidence). The comprehensive marketing commenced in February 2018 and *did* generate interest from a number of parties who sought to use the property for warehousing and alternative compatible uses. However, this report relies on the redevelopment resulting in an unviable financial proposition given that the site is too tight to retain the same amount of floor area and deliver a sufficient serving yard and car parking due to the high site cover (65%), and therefore it is difficult

to predict when a new occupier will be secured for the premises and its full occupation realised.

- 7.19 In addition, Colliers state that the roads surrounding the property are not suitable for large delivery vehicles, with cars parked along both sides of the already small streets. This could create a potential access problem for the site and have deterred a number of interested parties. The property is in generally poor condition and would likely require some capital expenditure and substantial amount of work to bring it up to the required quality to satisfy prospective occupiers. There are also significant costs associated with the removal of the asbestos identified within the existing buildings. Similarly, the exterior of the buildings is dated and coming to the end of their economic life. Colliers would anticipate that a number of occupiers may require additional loading doors and dock level doors.
- 7.20 In order to overcome the physical constraints to dispose of the buildings, the site in Colliers view would require a significant redevelopment in order to make it fit for purpose. The applicant proposes 175sqm of affordable B1 Class office floorspace, and the floorspace has been designed to be subdivided or open plan in order to create flexible accommodation.
- 7.21 The office floorspace will be provided at rents set at levels equivalent to 50% of open market rates. The workspace would be secured in this use through a Unilateral Undertaking and would be available only for local small and start up organisations. The proposed 175sqm B1 office floorspace would create approximately 18 full time jobs aimed to serve a local need for small businesses.
- 7.22 In response to this, it is noted that the market commentary focuses on West London, and in particular Park Royal / Ealing and Acton but Richmond is more akin to Kingston and Sutton than Ealing. Financial and insurance activities and Professional, scientific and technical activities are of significant importance in Richmond. There are 12,300 jobs in the Professional, scientific and technical activities sector and within the sector, Richmond upon Thames is particularly specialised in scientific research and development (1,700 jobs). Examples of related employment sites in the area include the scientific parks and research centres associated with Kew Gardens, the National Physical Laboratory and LGC Group. Across London, the vast majority (86 per cent) of workplaces are part of very small firms; “micro-enterprises” employing less than 10 employees and in Richmond more than 90 per cent of workplaces were micro-enterprises in 2015. A recommendation by Ramidus in their 2018 report for South London Partnership is that the SLP sub-region should seek to nurture modern space, capable of accommodating modern businesses that service the sub-regional and wider London economy. The key here is to recognise that the economy is demanding new forms of build space, and old assumptions about Use Classes and occupancy density are being challenged.
- 7.23 London Borough of Richmond, Employment Sites & Premises Study 2017 Update by Peter Brett Associates (PBA), showed high occupancy rates for the industrial sites in the borough. The small sites profile of the stock reflects the business profile of generally providing for the needs of the local population – local van-based distribution, motor repair, trade counter; no provision or need for much larger buildings occupied by businesses serving sub-regional activity. Businesses serving local catchments only require small to medium sized buildings that are close to the local residential / business market that they serve. They do not require excellent access to the strategic road network or the co-

locational advantages associated with larger sites elsewhere that serve the sub-regional market.

- 7.24 In relation to the Greggs site, PBA suggest that the rear of the site could accommodate smaller light industrial units with reasonable access and servicing arrangements. This type of light industrial space is in chronic short supply in the Borough. In the event of a redevelopment opportunity they state that there is a clear expectation that some light industrial units should be provided. With respect to industrial land, the conclusion is reached that there is a considerable gap in supply, and demand substantially exceeds supply. The SLP Report states that the overriding priorities here are for a greater protective blanket over commercial premises and the prevention of sui generis and other non-commercial uses denuding the business ecosystem.
- 7.25 In summary, there is an in-principle objection in relation to employment policies (Local Plan Policies LP40, and 42) which do not permit change of use to a predominately residential use on this protected employment site. A reduction in employment floor area (currently 79,000 sq ft) would only be acceptable if the alterations to the buildings resulted in new improved industrial floorspace, with servicing and yard areas. The Greggs site contains a number of different activities that have now mostly ceased (i.e. offices, storage, distribution, bakery ovens, and cold store) and the site could be described as a hybrid office/industrial/distribution site. The Local Plan designations reflect the mix of uses in the area. From the perspective of LP42, this is a designated Industrial Site and the token provision of 175sqm of commercial floorspace is not in line with the Council's requirements for new flexible, hybrid employment and light industrial B1 use. Even if the sequential approach were to be followed, considerably more than 175sqm of new employment floorspace should be provided on the site.
- 7.26 It is noted that the applicants have committed via a Unilateral Undertaking to let the office space proposed to an Affordable Workspace Manager pursuant to a Workspace Agreement, for a specific social, cultural or economic development purpose. These circumstances may include workspace that is:
- dedicated to specific sectors that have social value such as charities or social enterprises;
 - dedicated for specific sectors that have cultural value such as artists' studios and designer-maker spaces;
 - dedicated for disadvantaged groups starting up in any sector;
 - providing educational or research-driven outcomes through connections to schools, colleges or higher education; and
 - supporting start-up businesses or regeneration

- 7.27 This is welcomed by officers.

Principle of residential use (Use Class C2)

- 7.28 The proposal is for a predominately residential scheme delivering 116 units. Notwithstanding the in-principle objection to the loss of employment / industrial / office space, the main housing policy issues to be considered are:
- the need to provide on-site affordable housing;
 - policy requirements regarding mix of units, internal and external space standards and inclusive access;
 - acceptability of infill housing on this site with regards to scale and massing, impact on the character of the area and impact on amenity.

- 7.29 These matters will be discussed in further detail below.
- 7.30 The inclusion of residential use with a mixed-use scheme is generally considered appropriate, however it has not been demonstrated that the proposal would maintain existing employment / industrial / office floorspace and that the residential use would be compatible with the continued operation of industrial uses on the site. As such there is an in-principle objection to the proposal on the basis of the loss of existing employment/industrial/office floorspace. The benefits arising from the addition of housing/affordable housing/other benefits as proposed do not outweigh this loss.

Infill and Back Garden Development

- 7.31 Policy LP39(A) states that all infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. Applications ought to address the following factors:
1. Retain plots of sufficient width for adequate separation between dwellings;
 2. Retain similar spacing between new buildings to any established spacing;
 3. Retain appropriate garden space for adjacent dwellings;
 4. Respect the local context, in accordance with policy LP2 Building Heights
 5. Enhance the street frontage (where applicable) taking account of local character;
 6. Incorporate or reflect materials and detailing on existing dwellings, in accordance with policy LP1 Local Character and Design Quality;
 7. Retain or re-provide features important to character, appearance or wildlife, in accordance with policy LP16 Trees and Landscape;
 8. Result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens, in accordance with policy LP8 Amenity and Living Conditions;
 9. Provide adequate servicing, recycling and refuse storage as well as cycle parking;
 10. Result in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.
- 7.32 These issues are considered in more detail in the relevant assessment sections of the report.

(ii) Affordable Housing:

- 7.33 Policy LP36(A) of the Local Plan states that the Council expects:
- a. 50% of all housing units to be affordable housing, with a tenure mix of 40% housing for rent and 10% intermediate housing;
 - b. the affordable housing mix should reflect the need for larger rented family units and the Council's guidance on tenure and affordability, based on engagement with a Registered Provider to maximise delivery.
- 7.34 Where on-site provision is required, an application should be accompanied by evidence of meaningful discussions with a Registered Provider which have informed the proposed tenure, size of units and design to address local priorities and explored funding opportunities.
- 7.35 LP36(B)(a) states that on sites capable of ten or more units gross and all former employment sites, at least 50% on-site affordable housing provision is expected.

Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.

- 7.36 As per policy LP40 outlined above, the Council seeks to retain employment floorspace and does not wish to encourage the change of use of employment sites to potentially higher value residential uses. In those exceptional circumstances where the Council agrees a change of use, the lower Existing Use Value of employment land means that any residential development involving a loss of employment floorspace is required to increase affordable housing above the normal policy requirements for new build development or redevelopment.
- 7.37 The proposal includes 46 units of affordable housing (15 Affordable Rent, 2 Intermediate Rent, 29 Shared Ownership). The affordable accommodation schedule is below:

Tenure	1 bed flat	2 bed flat	2 bed house	3 bed flat	3 bed house	Total	Percentage
Affordable Rent	5	7	1	0	2	15	33%
Intermediate (Shared Ownership)	15	14	0	0	0	29	67%
Intermediate (Intermediate rent)	0	0	0	0	2	2	
Total	20	21	1	0	4	46	100%

- 7.38 The 46 affordable units amounts to a total of 40% affordable units across the site. Although the proposal does not achieve the 50% on-site affordable housing provision, viability information has been submitted by the applicant's quantity surveyor, DS2. This concludes that the total amount of affordable units is the maximum amount in order to achieve a viable scheme, and this has been agreed by the Council's Housing Viability officer. In addition, the Council's Housing officers have reviewed the tenure split for affordable housing outlined in the table above, and following negotiations this has also been agreed.
- 7.39 Had the application been considered acceptable overall, the applicant has agreed that it would enter into a s106 legal agreement with the Council to secure the above listed affordable housing and associated tenure mix. This agreement would have also included Early and Late Stage review clauses for housing viability based on the Greater London Authority's (GLA's) sample clauses set out in the GLA's Affordable Housing and Viability SPG. The need for these review clauses has arisen as this is a locally important industrial site where the expectation is to provide 50% affordable housing, and it is considered appropriate to review viability at different stages to check if the scheme can get nearer to 50%. The scheme intends to provide affordable housing at an agreed deficit so the GLA advice in this situation is that it would be necessary to specify that any review mechanism allows for a deficit to be overcome before any surplus value is used towards the provision of additional affordable housing. The agreement is to split any surplus profit 60/40 between the Local Planning Authority and the developer with 60% of surplus profit provided as an affordable housing contribution.
- 7.40 As the application is recommended for refusal because of the loss of a locally important industrial site, the early and late stage viability review clauses cannot be legally secured as these require a bi-lateral agreement and the application is hence also refused on this ground. It should be noted the Unilateral Undertaking

does secure the provision of the 46 Affordable Housing Units at the agreed tenure mix.

(iii) Housing Standards:

Housing mix

7.41 Policy LP35(A) of the Local Plan states that development should generally provide family-sized housing outside of town centres and Areas of Mixed Use, and that the housing mix should be appropriate to the location. The overall mix for the proposed units is 32 x 1 bed (28%), 36 x 2 bed (31%), 44 x 3 bed (38%), 4 x 4 bed (3%). The unit mix has been assessed by housing officers and is considered to provide a range of unit sizes that is appropriate to this location to accord with LP35 (A).

Residential standards - Internal space

7.42 The standards set out in policy LP35(B) and the Residential Development Standards SPD and should be addressed. Since 1 October 2015, the Council is applying the Nationally Described Space Standards (NDSS) when assessing new residential units.

- A single bedroom should be at least 7.5sqm and 2.15m wide
- A double bedroom should be 11.5sqm and 2.75m wide
- Head height should be at least 2.3m for a minimum of 75% of the gross internal floor area
- Suitable storage space to be incorporated into units
- Communal gardens to be sheltered from roads and not overlooked from habitable rooms.

Table 1 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	

7.43 Based on the submitted breakdown of gross internal floor areas (GIA) each of the proposed units generally conform to the NDSS's minimum GIA requirements. Notably, all 1 bed units exceed 50sqm GIA (noting that they are single storey), all 2 bed units exceed 70sqm GIA (noting that they are single storey), all 3 bed dwellings exceed 95sqm GIA (noting that some are single storey), and all 4 bed units exceed 130sqm GIA.

- 7.44 In terms of residential amenity for new residents, the proposed residential units are considered to receive adequate levels of daylight, sunlight and outlook. In particular, it is noted that the development maximises the number of dual aspect homes (83.6%) to allow cross ventilation and improved daylight, sunlight and outlook. The only single aspect dwellings are one bed units located within Building F, and each face east and west so that they are able to take advantage of morning and evening sun respectively. In addition, adequate amenity space is proposed for those units that are single aspect.
- 7.45 A Daylight and Sunlight report has been prepared by Point 2 Surveyors as part of the application, which assesses both internal and external amenity resulting from the proposed development. In terms of internal amenity, the report advised that 93% of the proposed rooms throughout the development achieve Average Daylight Factor (ADF) in accordance with BRE guidance. Ten of the remaining 31 rooms will achieve an ADF of 1.5% which is in line with ADF requirements for living rooms. A further 15 rooms will achieve an ADF of 1.4% which is just below this figure. As such the development is broadly in line with internal requirement for sunlight/daylight access to internal windows.
- 7.46 As such, the submission documents adequately demonstrate that the development provides an adequate standard of accommodation of each of the units in accordance with Policy LP35.

Residential standards - External space

- 7.47 The requirements of Policy LP35(C and D) and the Residential Development Standards SPD apply to external amenity space. A minimum of 5sqm of private outdoor space for 1-2 person dwelling plus an extra 1sqm per additional occupant should be provided. However, general consideration to amenity size and spacing can be made under policy LP39(A) as to whether the proposed scale and massing is acceptable, which was addressed earlier in the report.
- 7.48 The Design Review Panel considered the private amenity spaces are too small for the properties adjoining Norcutt Road and Crane Road, and encouraged to adjust the typology and provide a more generous space.
- 7.49 Since then, the revised documents suggest there has been an increase in the depth of rear gardens and maximising amenity spaces. In particular Houses C15-C30 have been shortened slightly in order to provide increased garden sizes. The gardens for Houses D1-D4 remain somewhat small, however they have undergone amendments to improve the relationship with their rear gardens to make them more usable and accessible. The proposed three bedroom dwellings have a minimum of 17sqm private amenity space within the rear gardens which are secure. For the apartment building (A, E and F) and smaller two bedroom houses (G), amenity space has been provided in the form of terraces and balconies which comply with Local Plan requirements. Each of the terraces are either east, west or south facing and are considered to receive adequate levels of sunlight/daylight access. On balance, although the rear gardens of some properties remain small, they meet the minimum requirements for Policy LP35 and given the amendments listed above they are considered acceptable overall.
- 7.50 Playspace is expected for all age groups identified in the London Plan, the quantity of which would be dictated by the number of children expected to be living on the development, calculated using the Mayor's Child Yield Matrix. Using the latest GLA occupant yield and playspace calculator, the predicted child yield for the site is 52 children. In relation to junior children (5 to 11 years) and senior

children (12+ years), it is expected that their playspace would be provided in larger play areas off site, and the applicant has offered financial contributions secured via a Unilateral Undertaking to facilitate this. In relation to children up to 5 years old, all houses of 3-bed or more are provided with gardens which reduces the policy requirement for 0-4 playspace to 100sqm under Richmond guidelines. The scheme proposes a total of 368sqm of children's playspace and a further 165sqm within communal terraces which is policy compliant.

- 7.50 A Unilateral Undertaking has secured that a contribution is made to the provision of play areas off-site. This amount would be £45,747 for juniors and £25,415 for seniors, along with associated maintenance fees. Furthermore, with 275 additional people arising from this development, and the high likelihood that an already at-capacity Kneller Gardens and surrounding associated spaces (Crane Valley / DNR pathway, Mereway) will be the main public open space destination, a commuted sum of £27,500 is required to be spent in the two years following occupation of the development on projects that improve accessibility, increase available facilities and build capacity for activities / health and well-being / social cohesion for existing and new residents,. This has also been secured within the Unilateral Undertaking.

Inclusive access

- 7.51 Policy LP35(E) requires 90% of new housing to meet Building Regulations Requirement M4(2) 'accessible and adaptable dwellings' and 10% to meet Building Regulation Requirements M4(3) 'wheelchair user dwellings'.
- 7.52 The applicant's Design & Access Statement makes it clear that 90% of the new dwellings are M4(2) compliant and the remaining 10% will be M4(3) compliant, to accord with Policy LP35 (E). It is noted that two lifts are proposed within Building F. In relation to M4(3) wheelchair 'accessible' i.e. a home readily useable by a wheelchair user at the point of completion, this should only be applied where the local authority is responsible for allocating or nominating a person to live in that dwelling - in effect this can only be rented as affordable housing; private units would therefore be M4(3) wheelchair 'adaptable'. Should the application be considered acceptable overall, it would have been appropriate to secure by condition which units (i.e. identifying the flat/house numbers) fall within each Building Regulation.
- 7.53 Part M4 (3) of the Building Regulations regarding 'wheelchair user dwellings' distinguishes between 'wheelchair accessible' (a home readily useable by a wheelchair user at the point of completion) and 'wheelchair adaptable' (a home that can be easily adapted to meet the needs of a household including wheelchair users). M4(3) wheelchair 'accessible' should only be applied where the local authority is responsible for allocating or nominating a person to live in that dwelling.
- 7.54 The Council's Specialist Housing Occupational Therapist reviewed the application including its suitability for wheelchair users in relation to the Council nominated housing units. Following negotiations, it was advised that the units would comply with M4(3) requirements subject to the inclusion of s106 clauses setting out the obligations regarding ongoing liaison with the Council's Specialist Housing officer regarding detailed layout and fitting out.

(iv) Character, Design, Massing and Layout:

- 7.55 The NPPF attaches great importance to the design of the built environment and good design is a key aspect of sustainable development. New developments are encouraged to respond to local character and history and reflect the identity of local surroundings and materials. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.
- 7.56 In assessing the impact of development on a Conservation Area, the Local Planning Authority must consider the tests set out in S72 of the Planning (Listed Buildings and Conservation Area) Act (1990). Under this legislation, the Local Planning Authority must have special regard to the desirability of preserving or enhancing the character and appearance of the conservation area. The tests are encapsulated in policy LP3, which states that applications should only be granted where they conserve and where appropriate enhance the significance, appearance, character and setting of the surrounding historic environment.
- 7.57 Policy LP1 of the Local Plan states that new development must be of a high architectural and urban design quality. Development must be inclusive, respect local and contribute positively, to its surroundings based on a thorough understanding of the site and its context. LP2 expands on this by explicitly requiring new buildings to respect and strengthen the setting of the borough's townscapes and landscapes, through appropriate building heights.
- 7.58 Policy LP5 (Views and Vistas) seeks to protect the quality of the views, vistas, gaps and the skyline, which contribute to the character, distinctiveness and quality of the local area.
- 7.59 Policy LP39 reinforces the above, by stating that all infill development must reflect the character of the surrounding area. This is set in further detail earlier in the report.
- 7.60 Further guidance can be found in the Council's SPDs on Design Quality.
- 7.61 The application site is an industrial/employment site which largely comprises industrial style buildings and hardstanding and can therefore be considered as previously developed land. The proposed redevelopment including associated gardens and open green space would replace the existing hardstanding and buildings, and therefore is not considered to result in the loss of garden or amenity space in accordance with Policy LP39. The dominant character in the area is that of tight knit houses and the proposed plot widths are generally considered to be of sufficient width to accord with the established spacing of properties in the area.
- 7.62 Following the initial submission of this application, the Design Review Panel (DRP) reviewed the submission documents and the main points raised by the panel were as follows:
- Riverside end compromised by car parking
 - Riverside: soften hard edge and create sense of place
 - Parking: less would benefit the proposals
 - Favoured a pedestrian crossing over the River Crane
 - Possible loss of 4 houses at the river end to enable a more effective use of space
 - Concern about junction of Gould Road and Crane Road- overlooking from roof garden in Building F

- Omit fourth storey and balconies to western end of Building F
 - Remaining 4 storey element rather dominant with lantern roof- consider possibility of flat roof
 - Refine darker tone of 4th floor of Building F
 - Lack of garden space for houses- too small; esp.C15-C30; D1-D7
 - Urban grain slightly tight despite London Plan compliance.
- 7.63 Following the review, the applicants amended the plans (from a design perspective) in response to the points raised as follows:
- Car parking: removal of 15 spaces from the riverside area.
 - Riverside area: reduced parking, boardwalk introduced with softer river edge, tree planting increased.
 - Bridge crossing: safeguarded area for future bridge link.
 - 4 houses closest to riverside; a possibility raised by the DRP was omitting these. They are retained however in smaller form from the original pre-app proposals.
 - Gould Road/ Crane Road/ Building F: reduced parapet and roof terrace, roof profile and fourth floor amended, materials towards roof lightened.
 - Lantern roof / roof pitch responding to context.
 - Lack of garden space: deeper gardens and alterations proposed to internal arrangements throughout the site.
 - Urban grain: not specifically addressed - however rear gardens increased in size as above.
- 7.64 The proposals are considered an improvement in design terms with a reduced impact on the surrounding area. The proposed heights are broadly acceptable, and generally in line with considerations outlined in the Village Planning Guidance for the area. They are reviewed in the context of the existing one to three storey industrial buildings which in general are acknowledged to be of poor quality and do not contribute positively to the street scene.
- 7.65 The proposed four and five storey buildings ('Building F') towards the northern side of the site are similar in scale to Lockcorp House in relation to their height. This building was allowed on appeal on 18 June 2020 for a five storey building comprising 15 affordable residential units (19/2789/FUL). The Lockcorp building would be located approximately 40m from the proposed five storey buildings. It is acknowledged that construction of this building has not yet begun, however it provides a strong point of reference as to what may be considered acceptable in terms of height in this area. Whilst concerns regarding the height of these buildings have been raised by residents in the area, it is considered that they have been positioned within an area which would have the least possible impact on the character of the area, whilst also being setback from the river in order to respect this space. The taller buildings in this section of the proposed development comprise varying heights ranging from three to five storeys, which provides some variation and a gradual increase in height from the buildings surrounding the development, rather than an abrupt increase directly to five storeys. Furthermore, the external materials of the fourth storey element have been revised and the roof pitch and parapet heights have been reduced in order to improve the relationship with the existing terraced properties along Gould Road and Crane Road. The proposal also has the support of the Council's Urban Design team and, on balance, this element is considered to comply with Policy LP2.
- 7.66 It is considered that the 'mews' design is appropriate and relates to the scale and grain of the local area, and this is in line with the Twickenham Village Plan

guidance. The proposed 'entrance buildings' to the site on Edwin Road are considered to provide a gateway into the development, and also follow the established building line within the street. The Council initially raised concerns with the size of the rear gardens of properties within the mews, however these have since been amended and are now considered acceptable as they are broadly in keeping with the size of gardens within the surrounding area, which are relatively limited in the case of Norcutt Road and Warwick Road. A visualisation of the mews street taken from the Design and Access Statement is shown below.



Visualisation – 'mews' street

- 7.66 In relation to the density of development, the applicant has submitted a density capacity assessment of surrounding roads and adequately demonstrated that the scheme is in line with the local context and fits with the footprints and local grain of the area. In particular, it is noted that Norcutt Road has 103 units per hectare, Hamilton Road has 99 units per hectare, and the current proposal has 103 units per hectare. The proposed density would also be compliant with the London Plan Density Matrix guidelines for a site in this location with a PTAL 2 rating.
- 7.67 The opening up of views towards the riverside compared to the existing situation is considered to be a positive feature. The basic townscape pattern of the surrounding streets is replicated, which is a positive townscape feature.
- 7.68 In relation to the proposed dormers, the dwellings effectively appear as 3 storeys, within a predominantly 2 storey area. However, the impact of scale is managed and overall these dwellings appear to fit the grain of the area, traditional in some respects but with some elements that ensure they are evidently modern. It is also

evident that box dormers are fairly common in this area, particularly along Crane Road, and it could not be argued that the proposed dormers are out of keeping with these existing features of the area. The dormer windows would ideally be smaller to reflect an appropriate hierarchy of fenestration (particularly house type 3 & 4), however the windows are set relatively deep and on balance they are considered to be appropriate.

- 7.69 With regards to treatment at the River Crane end of the site, the applicant has revised the design of the river edge by enhancing soft landscaping and general open space by the river. This has been achieved by removing 15 parking spaces around this location. This is considered to be an improvement and results in a more positive relationship with the river. A 100m boardwalk runs the length of the river on the northern side of the site, which enhances opportunities for play and recreation in this area. The tree planting and shared surfacing approach is also considered a positive, as are the open views towards the riverside in the mews street.
- 7.70 There is a wide variety of material finishes within the area surrounding the application site. However, most buildings use brick as the main material while some have a painted or rendered finish. The applicant proposes a mixture of brick, metal, charred timber and stone which appear to fit comfortably within the context. In particular, various different brick types have been chosen from the local context, the variety of which would serve to break down the visual massing. The stone and metal provide further variety and also add reference to the site's industrial past. It is noted from the applicant's Design & Access Statement that these materials have been chosen to give identity to each building and give the appearance that different parts of the development have been constructed over time. The Council's Urban Design team reviewed this aspect and raised no concerns with the proposed materials.
- 7.71 In light of the above, the scheme is generally compliant with Development Guidance in the Twickenham Village Plan, relevant Local Plan Policies: LP1, LP2, LP5, LP8, LP13, LP16, LP39, and associated SPD guidance. Had the application been otherwise acceptable, this would have been subject to conditions relating to material types and palettes, fenestration, green roofs and solar PV panels, landscaping and lighting.

(v) Impact on Neighbours

- 7.72 Policy LP8 of the Local Plan requires that developments do not cause harm to neighbouring amenities in terms of daylight/sunlight, outlook, privacy, noise and disturbance. Policy LP10 specifically sets out that local environmental impacts of all development proposals should not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land.
- 7.73 LP8 states that proposals must ensure that there is a minimum distance of 20m between main facing windows of habitable rooms to preserve the privacy of existing properties affected by the new development. Habitable rooms include living rooms, bedrooms and kitchen with a floor area of 13sqm or more. Where principal windows face a wall that contains no windows or those that are occluded (e.g. bathrooms), separation distances can be reduced to 13.5 metres.

Overlooking/Privacy

- 7.74 Policy LP8 also requires a minimum 20 metres minimum distance between residential developments for privacy reasons. Principal windows which face a wall that contains no windows or those that are occluded (eg bathrooms) can be reduced to 13.5 metres separation distance.
- 7.75 Firstly, the introduction of the new mews street will include rear gardens located adjacent to the neighbouring properties which face Norcott Road to the east and Crane Road to the west. Setbacks from the rear boundary of the site do vary, however this ranges from approximately 4m to 9m along Norcott Road and approximately 3m to 6.2m along Crane Road. Although some of these properties are located within relatively close proximity of the boundary line, the rear elevations of the terrace houses have generally been designed so that the upper floor window openings are limited in size, with the introduction of frosted glazing to bathrooms and bedrooms in many instances. Any dormer windows to the rear elevation are setback behind the first floor in order to reduce any overlooking potential. Furthermore, pitches have been introduced to the roofs of dwellings within the mews to reduce overlooking by oblique windows. In relation to Crane Road, these properties have slightly larger gardens which reduces the potential for overlooking habitable rooms.
- 7.76 The windows for apartment blocks across the site have been appropriately designed to avoid overlooking of other properties within the development. The scheme highlights that a minimum of 13.5m between blank walls or bathrooms windows and a minimum of 20m has been provided between habitable rooms and existing houses surrounding the development, as per the requirements of Policy LP8.
- 7.77 The apartments at Building F are located hard against the shared boundary with 58A Crane Road. A roof terrace is located above the section of building adjacent to the properties on Crane Road. This section of building is 3 storeys in height with a flat roof, while the larger 4 storey element is set a minimum distance of 6.5m to the shared boundary to the south extending to 11m. As per the image below, there are no windows located to the southern elevation for the section of building located adjacent Crane Road, while the windows for the 4 storey section are setback from the boundary. Overlooking from the roof terrace would generally occur over the roofs of these properties, and would be further mitigated by planting to the edge of the terrace. Should the application be considered acceptable overall, this planting will be secured by condition.
- 7.78 In relation to Gould Road, Nos. 4-12 adjoin the south and west boundaries of the application site. These properties are separated from Building F by the existing dwelling at No. 2 Gould Road which forms part of the application site. As per the image below, there are windows located to the first, second and third floor of Block F which are orientated toward the rear gardens of these properties. The proposed building is separated by approximately 14m from the eastern boundary of No. 4 Gould Road. Initial concerns were raised by the Council in relation to potential overlooking of the adjacent rear gardens of properties along Gould Road as result of proposed balconies. In response the applicant has removed the balconies to the western elevation of Block F and replaced these with juliet balconies to mitigate overlooking to the rear gardens of Nos. 4-12 Gould Road. Although this does leave the proposed windows, the existing boundary fencing to No. 2 Gould Road does help to alleviate concerns of overlooking to the rear gardens. On balance, it is considered that this will not lead to a level of overlooking which could unacceptably harm the occupier's enjoyment of their rear garden spaces.



South elevation – Block F

7.79 There are 4 two storey dwellings proposed to be located directly to the north of Nos. 4-12 Gould Road (labelled Building G). Although these properties have limited separation from the properties on Gould Road due to the rear gardens being approximately 2m in depth, they do not have any first floor windows to the rear elevation which could overlook the rear gardens of Nos. 4-12 Gould Road. As such, Building G is considered to be acceptable in terms of any overlooking impacts.



2 View from South-West

South-west elevation – Alcott House and proposed Norcutt House

7.80 In relation to Building E, this is located near the eastern boundary of the site, close to Alcott House and Lockcorp House. Lockcorp House has been granted planning permission (19/2789/FUL) for the demolition of the existing B1 light industrial unit and construction of a new 5 storey building comprising 15 affordable residential units. The building would have several windows to the western elevation facing Building E, however these are high level windows which would not be expected to be adversely impacted in terms of overlooking from Building E. In relation to Alcott House, this comprises a three storey residential building constructed following planning permission in 2008 (06/2018/FUL). As per the image above, this building features bedrooms, lounges and kitchens to the west/north elevation near the application site. There is the possibility of some harm linked to the siting of Building E as it will impose itself in the outlook gained from Alcott House and the privacy afforded, however amendments have been submitted that do minimise overlooking to a limited number of windows and employ a window design that helps direct views into the application site. A close analysis of this relationship of the proposed windows to the southern elevation of Building E would be located a minimum distance of approximately 6m from the habitable room windows to Alcott House. The rear elevation windows to Building E would serve bedrooms and as such, although they would be located at an oblique angle, the proposal would fall well short of providing 20 metres separation distance between habitable room windows (the distance ranges between 5.6 and 16.6 metres). In order to reduce the potential privacy impact to existing occupiers, the applicant has agreed to introduce oriel bay style windows to the southern elevation of Building E which direct views away from Alcott House. Drawings have been submitted which indicate viewing cones, sightlines and distance of separation between the midpoint of the ground, first and second floor side elevation windows at Alcott House and the proposed oriel windows (see images below). The drawings demonstrate that the lounge windows at Alcott House are secondary to the main kitchen/lounge windows, while one of the bedroom windows is to a second bedroom. 3 of the windows located in the same position across all 3 floors serve a primary bedroom window the nearest window to Building E is located 6.8m away. However, given the combination of the oblique angle between the buildings and the proposed oriel style bay windows which direct views away from Alcott House, and on balance it is considered that the overlooking impact to the west elevation windows to Alcott House will not be significantly harmful.



Overlooking angles from ground floor Building E to Alcott House



Overlooking angles from ground floor Alcott House to Building E



Overlooking angles from first/second florr Building E to Alcott House



Overlooking angles from first/second Alcott House to Building E

- 7.81 With respect to Building A, this is located near the rear (eastern) boundary of Nos. 52-58 Crane Road. First and second floor windows are located to the rear elevation of Building A, and these are setback approximately 7m from Nos. 52-58 due to the proposed rear garden adjoining these properties. The rear elevation windows serve bedrooms rather than primary habitable rooms and although these windows are separated greater than 20m distance from the rear elevation windows to properties on Crane Road, they would overlook the rear gardens of these properties. As such, the first and second floor rear elevation windows of Building A would also have the potential to create harmful overlooking of the above listed properties.

Daylight and sunlight

- 7.82 A Daylight and Sunlight report has been prepared by Point 2 Surveyors as part of the application. This assesses the levels of sunlight and daylight within the proposed development as well as how it impacts the surrounding residential properties. It is noted that the level of light to the surrounding properties is already substandard in some cases due to the existing buildings on the site, which range from 3 to 5 storeys in height.
- 7.83 As per the Council's policy guidance, the applicant utilised the guidelines set out in the 2011 Building Research Establishment (BRE) report to assess sunlight/daylight levels for surrounding properties. Of the 70 residential properties which surround the site, 70 of the 75 would fully adhere to the BRE guidelines. The report also indicates that a total of 30 properties surrounding the site would benefit from improved sunlight/daylight levels as a result of the proposed development. These gains are particularly in relation to the properties on Norcutt Road where buildings are located hard up against the adjoining boundary. In relation to the 5 properties that do not adhere to the guidelines, these include 58 Crane Road, 4 Gould Road, 50 Edwin Road, 73 Norcutt Road (Alcott House) and 75 Norcutt Road (Lockcorp House). In relation to each of these 5 properties, further details were provided as to the reasoning that the proposal did not adhere to the BRE test and why this was considered acceptable:
- 58 Crane Road: 6 of the 7 windows tested would comply with the BRE guidelines. However, the recommended Vertical Sky Component (VSC) of 27% falls slightly below the requirements by 3%. Despite this, the room this window serves would adhere to BRE guidelines overall, retaining direct sunlight to 96% of the room. Thus, there will be a negligible impact to sunlight/daylight on this property.
 - 4 Gould Road: 3 of the 4 rooms tested would comply with BRE guidelines. The kitchen is served by two windows which would comply with the recommended VSC, however they would have a daylight distribution of 32% which is above the 20% outlined within BRE guidelines. Despite this, the room would retain 60% direct sunlight, and on balance, it is considered that an appropriate level of sunlight would be retained to this property.
 - 50 Edwin Road: There are 4 habitable rooms within this property served by 6 windows, and 1 room on the first floor will comply with the BRE test. The kitchen on the ground floor is served by 3 windows, 2 of which adhere with BRE guidelines. The remaining window will have a VSC of 17% under the proposal, however the kitchen would retain 98% direct sunlight and comply with the BRE criteria for daylight distribution. The living room would have a VSC of 18%, however again it would comply with the BRE criteria for daylight distribution, and would retain direct sunlight to 83% of the room. The

remaining room will retain a VSC of 24% which falls just below the recommended 27%, and it would adhere to BRE criteria for daylight distribution, and retain direct sunlight to 70% of the room.

- 73 Norcutt road (Alcott House): 37 of the 41 windows assessed comply with BRE guidelines for VSC, while 28 of the 29 rooms adhere with the daylight distribution. 2 of the 3 windows (serving bedrooms) do not comply with VSC, however they do comply with No Sky-Line (NSL) criteria. The remaining room is a lounge which has 2 windows, one of which complies with VSC. The other window retains a VSC of 23%, and there would be direct sunlight to 84% of the room area. Most importantly, the rooms facing south will all adhere with BRE guidelines.
- 75 Norcutt Road (Lockcorp House): At this stage the proposed 5 storey building has planning permission, however building has not yet started on it. As recommended by BRE guidelines, Point 2 conducted an Average Daylight Factor (ADF) assessment for this consented building that has not yet been constructed. It was noted that 14 of the 15 rooms adhere with minimum ADF guidelines. The remaining room is a ground floor living/kitchen/diner which will achieve an ADF of 1.5%, which is slightly below the requirement of 1.5% for a multi-use room. However, it would comply with the requirements for a living room, and overall the level of amenity retained for this room is considered acceptable.

7.84 In relation to external amenity areas, a Sun and Ground analysis was undertaken by Point 2 Surveyors for 21st March, and it was advised within the report that all of the surrounding amenity areas would meet the BRE guidelines aside from Lockcorp House (75 Norcutt Road). The area to the south of Lockcorp House would experience a reduction in the area that sees direct sunlight from 46% to 10%, however it was noted that it is unclear from the plans that it appears this area will be used as a car park for the building. Furthermore, on the 21st of June (summer), this area will retain 2 hours of direct sunlight to 91% of its area.

7.85 Following amendments to the proposal, a further report was prepared by Point 2 which concluded that the daylight, sunlight and overshadowing levels will not result in any further impact on surrounding properties, and in parts of the site will improve due to a slight reduction in the bulk and massing of parts of the development, particularly in relation to properties along Norcutt Road. As such, it is considered that the proposal would have an acceptable impact on daylight and sunlight levels to properties in the surrounding area, in compliance with Policy LP8.

Bulk, massing and visual intrusion

7.86 The existing relationship between the industrial buildings on the site and the neighbouring properties is acknowledged, which in some cases include buildings built hard against the adjoining boundary.

7.87 As stated above, the proposed mews street will include rear gardens located adjacent to the neighbouring properties which face Norcott Road to the east and Crane Road to the west. Setbacks from the rear boundary of the site do vary, however they vary from approximately 4m to 9m along Norcutt Road and approximately 3m to 6.2m along Crane Road. For the majority of these dwellings along Norcutt and Crane Road, existing industrial buildings are constructed hard against their rear boundaries. The proposed mews street will include dwellings of two stories in height with living spaces within the roof. However, given the existing

situation and the separation created by the proposed rear gardens, it is not considered that the proposed buildings within the mews street would result in an unreasonable level of bulk or visual intrusion on these properties within the adjoining streets. Similarly, with respect to Building A located to the end of the proposed mews street, this is setback approximately 7m from the rear (eastern) boundaries of Nos. 52-58A Crane Road. Although it is 3 stories in height, the separation distance is considered sufficient to reduce any potential for it to appear visually intrusive or dominant. A single storey element extends a further 3m closer to the shared boundary, however given the height of this part of the proposal it would not be considered to impact on these properties in any way.

- 7.88 With regard to the Edwin Road entrance to the site, a two storey commercial building would be located adjacent to the boundary with No. 50 & 52 Edwin Road. Although this two storey structure would replace an existing single storey building on the application property, and it would be located hard against the shared boundary, the east facing wall at No. 52 features no windows and thus the proposal would not impact this dwelling due to its blank wall. In addition, a 1m gap would be retained between the dwellings and the proposed commercial building would not extend beyond the rear wall of No. 52. As such, the proposal would not be expected to appear visually intrusive or dominant on this property.
- 7.89 In relation to Building F, this is located hard against the boundary of No. 58A Crane Road. The four storey element is separated from the shared boundary by between approximately 6.5m to 11m, while the three storey element is located against the party wall of No. 58A. Noting the existing onsite situation which includes a part 2/part 3 storey building against this boundary, it is not considered that this part of the proposal would be unreasonable. There would be a single storey element (with roof terrace above) located beside the rear garden of No. 58A, however this would also replace an existing single storey element in the same location and therefore is not considered a material worsening of the existing situation.
- 7.90 In relation to Nos. 4-12 Gould Road, the applicant has made minor alterations to the massing of the adjacent Building F in order to reduce the visual bulk of this part of the development. Since the application was first submitted, the parapet height of the roof terrace has been reduced slightly, while the material treatments of the fourth floor and roof profile have been lightened to reduce the visual impact and 'top heavy' appearance on adjoining properties and the street. The bulk of the building (excluding the open balconies) is separated by approximately 12m from the eastern boundary of No. 2 Gould Road. Although Building F would be 4 storeys in height, taking into account the lightening of the upper storey along with the separation distance from Nos. 4-12 Gould Road, it is not considered that the proposal would appear dominant or visually intrusive from these properties.
- 7.91 There are also 4 two storey dwellings located directly to the north of Nos. 4-12 Gould Road (Building G). Although these properties have limited separation from the properties on Gould Road due to the rear gardens being approximately 2m in depth, the elements closest to these properties are single storey in height. The two storey roof elements of the buildings are separated from the shared boundary by approximately 6.5m, and noting these distances it is not considered that the bulk and massing of Building G could be considered visually intrusive or dominant in relation to Nos. 4-12 Gould Road.
- 7.92 However, in relation to Building G, this building is located a minimum distance of approximately 5m distance from the habitable room windows of the approved plans for Norcutt House directly to the east of the site. Given the height and

proximity of Building G to these windows, the proposal would be considered to appear visually intrusive and reduce the outlook enjoyed by the occupiers of these units. It is also noted that the east elevation windows for Norcutt House are high level windows which will primarily be used for light access.

- 7.92 In light of the above it is considered that the proposal fails to accord with Policy LP8 of the Local Plan.

Noise assessment

- 7.93 The applicant has submitted an Environmental Noise Survey prepared by Paragon Acoustic Consultants. A background noise survey was undertaken to determine the amount of noise existing in the vicinity of the application site. A number of existing sources of noise were identified including noise from aircraft from the nearby Heathrow Airport, the railway lines to the north, and road traffic in the area. This information is proposed to be used to determine whether the proposed mechanical plant is located in the appropriate area of the site to reduce noise impacts on surrounding properties based on the amount of decibels to be emitted.

- 7.94 A Health Impact Assessment was also submitted by Trium Environmental Consulting Ltd. This report assessed the impact of noise and neighbourhood amenity in relation to the proposed scheme. The types of measures to be included in the scheme in order to minimise noise both during and post construction were identified (such as a Construction Management Plan), and it was concluded that the health impacts would be appropriate subject to the implementation of appropriate mitigation measures.

- 7.95 Noting that the proposed scheme has to be considered against the existing operations carried out on the Greggs Bakery industrial site, it is not considered that there will be a material worsening of the existing situation in relation to noise levels emitted from the site.

- 7.96 The proposal has been reviewed by the Council's Environmental Health Officer who reviewed the report by Paragon Acoustic Consultants. It was concluded that the report has established appropriate external noise criteria which should be used by the applicant in the future selection of mechanical plant and any noise mitigation scheme required.

- 7.97 Should the application been considered acceptable overall, the noise criteria and mitigation scheme recommended in the report will be conditioned accordingly.

(vi) Highways and Transport:

- 7.98 Policy LP44 of the Local Plan requires new development to not have a severe impact on the operation, safety or accessibility to the local road network. Policy LP45 requires new development to make provision for the accommodation of vehicles in order to provide for the needs of the development, whilst minimising the impact of car-based travel including on the operation of the road network and local environment, and ensuring making the best use of land.

Parking

- 7.99 On-site parking spaces for 100 vehicles are proposed to accommodate the 116 residential units (which amounts to 0.86 parking spaces per unit). 12 of these spaces would be accessible parking spaces. There would be 1 further parking

space provided for the commercial unit on-site, along with 1 on-street car club bay. In addition, cycle parking of 228 spaces is proposed. No visitor parking is proposed within the deployment.

- 7.100 The Local Plan states that the parking requirements of the site need to be provided in accordance with the London Plan. The area has a PTAL of 2 and the site is within Controlled Parking Zone (CPZ) West Twickenham (WT) which operates between 08.30 and 18.30, Monday - Saturday. Paragraph 11.2.3 of the Local Plan states: *In general, it is expected that in PTAL areas of 0-3 the standards should be met. In PTAL areas of 4-6, parking provision at a level lower than the standard may be appropriate where this can be demonstrated as acceptable, taking account of local characteristics, availability of sustainable modes of travel and public transport provision, and availability of on-street parking spaces.*
- 7.101 The standards referred to are defined in appendix 3 of the same document as 1 space per dwelling for 1-2 bed dwellings, and 2 spaces per dwelling thereafter. 166 off-street parking spaces would need to be provided in order to meet these maximum parking standards. The applicant has used the Census of 2011 to conclude that 30% of households in Richmond Borough have no car, 52% have one car, 16% have 2 cars and 2% have 3 cars. In reviewing this information, the Council's Highways officer advised that this is not considered appropriate technical analysis to demonstrate that the maximum parking standards do not need to be met because this table in the Census of 2011 is based on an average across the whole Borough, where some areas have much higher PTAL scores than others.
- 7.102 To use the Census as appropriate technical evidence, the Council's Highways officer advised that the applicant would need to cross-tabulate dwellings with habitable rooms with levels of car ownership. Analysis of this type has previously been accepted in other parts of the Borough with the same PTAL score, and this has shown that, in general, dwellings with 1-3 habitable rooms have 0.7 cars per household, and dwellings with 3-5 habitable rooms have 1.2-1.4 cars per household. Based on this analysis, and the fact that the applicant has agreed to allocate no more than one vehicular parking space per dwelling, this would give a total of no more than 104 vehicles for 100 spaces, a deficit of 4 spaces.
- 7.103 Although this does fall slightly short of the required number of spaces, on balance the total number of parking spaces for residential properties is considered acceptable for this type of development. The above analysis demonstrates that the deficit of parking spaces would be very small, and it is noted that the site is within close proximity of a PTAL 3 rating, where access to public transport is slightly higher. Furthermore, had further parking been proposed under this development, there would likely have been an objection on character and amenity grounds due to an over-abundance of parking across the site.
- 7.104 In relation to the flexible B1 commercial space, 1 parking space would be allocated to the proposed 175 GIA sqm space. The Council's Local Plan, which is in accordance with the London Plan, requires 1 space per 100-600sqm of B1 business floorspace in outer London boroughs (such as Richmond). Given that there is only 175sqm of space proposed, the proposed 1 car park space allocated to the commercial unit is considered acceptable as it meets the required standards set out in the London Plan.
- 7.105 As set out above the development is located within a CPZ. The applicant has agreed to enter into a Unilateral Undertaking to preclude residents and

employees of the site from purchasing residential and business parking permits within the CPZ. In addition, as part of the 106 agreement, the applicant will be required to provide 5 year memberships to the car club.

7.106 The car club parking bay will be located on Edwin Road, which has been agreed to by the Applicant and secured through the Unilateral Undertaking. As the site is within a CPZ, a Traffic Management Order under the Road Traffic Regulation Act 1984 will also be required to reallocate the CPZ bay space as a car club bay. The costs of the TMO would be reimbursed via the Unilateral Undertaking.

Cycle parking

7.107 Policy LP44 of the Local Plan seeks the provision of appropriate cycle access and sufficient, secure, cycle parking facilities. Parking standards ought to be as per the London Plan. The London Plan states that 1 long-term space per studio or 1-bedroom dwelling and 2 long-term spaces for all other dwellings should be provided as well as 1 short-term space per 40 dwellings.

7.108 The London Plan requirements for commercial uses are outlined in the table below:

Land Use		Long-stay	Short-stay
B1	Business offices	Outer London: 1 space per 150sqm	First 5,000sqm: 1 space per 500sqm Thereafter: 1 space per 5,000sqm
B1	Light industrial and research and development	1 space per 250sqm	1 space per 1,000sqm
B2 – B8	General industrial, storage or distribution	1 space per 500sqm	1 space per 1,000sqm

7.109 There is therefore a requirement of 202 long-term spaces and 3 short-term for this scheme (inclusive of both the residential and commercial component). 228 cycle spaces are proposed, comprising 216 long stay residential spaces, 6 long stay commercial spaces, 4 short stay residential spaces, and 2 short stay commercial spaces. As such the proposed cycle parking is in accordance with standards set out in the Draft London Plan.

Access to the Development

7.110 The main vehicular, pedestrian, and cycle access to the development is proposed to be from the northern side of Edwin Road, an unclassified urban road serving mainly residential land uses. This would involve the relocation of the existing bell-mouth access and the installation of dropped kerbs and tactile paving and lining on Edwin Road. The new access would move the access about 2-3m eastwards.

7.111 Therefore, the Council transport officer advised that a Traffic Management Order will need to be secured to extinguish 1 CPZ bay east of the access and replace this with 1.5m of double yellow lines to protect the visibility from the junction. The applicant has agreed to include this as part of the Unilateral Undertaking .

- 7.112 Should the application be considered acceptable overall, a legal agreement under s178 of the Highways Act 1980 will be implemented to construct a new egress treatment from the development on to the highway at Gould Road/Crane Road. This will be subject to the technical approval of the Council's Highway Engineers.

Transport, servicing and construction

- 7.113 A Construction and Demolition Management Plan prepared by London Square was submitted with the application. This sets out the type of construction and demolition to occur as part of the proposed development, how this will be managed throughout the process, and provides details of key matters such as air quality during the construction phase, noise controls, vibration, pollution and temporary lighting.
- 7.114 The Council's Highways officer reviewed the Construction and Demolition Management Plan which is satisfactory for the purposes of this application.
- 7.115 Should the application be considered acceptable, a detailed plan will be secured by condition.

Pedestrian network

- 7.116 The introduction of public access to the River Crane as well as a potential future pedestrian footbridge is a welcome introduction to the wider pedestrian network. However, in relation to connectivity to the Craneford Way playing fields to the north of the River Crane, whilst rights of way through the site, alongside the Riverwalk and safeguarding space for a new bridge across the Crane are secured, no bridge is specifically proposed nor any public access to it so this is given only very limited weight as a benefit of the application as a whole
- 7.17 The applicant has taken the total number of trips the development will generate at the AM and PM weekday peak hours from TRICS data and has then used the Census to identify the method of travel to work and therefore the number of pedestrian trips. The Council's Highways officer advised that this only considers the needs of those who use the pedestrian network to get to work for all or part of their journey and not those who walk to school or college for part or all of their journey. Notwithstanding this, it was advised that for the most part, between the southern-most egress from the development and Twickenham town centre, there are footways of 2m-2.5m on both sides of the road outside of the development as well as signalised pedestrian crossing facilities on Heath Road, the A305, The Green, and London Road. On balance, the development is considered to have an acceptable impact on the wider pedestrian network.
- 7.118 The applicant has agreed via the Unilateral Undertaking to a s106 legal agreement clause for public rights of access for pedestrians, cyclists as part of any approval. This would include pedestrian and cyclist access to the River Crane walk.

Shared Space

- 7.119 A shared space access road is proposed as part of the development which has a width of 7m between the building lines of plots D-1 to A-G-1 and the western ends of the private front parking courts of plots C1 to C30. This comprises of a service strip immediately to the east of plots B1 – A-G-1 of 0.5m, a flush kerb

2.5m, and then a running lane width for vehicles of 4m. This area will be a private access shared space road.

7.120 The Council's transport officer advised that while the shared space access road is wide enough to accommodate two-way vehicular traffic, the main objectives of shared space areas are to encourage low vehicle speeds, create an environment where pedestrians can stop and talk without feeling intimidated by motor traffic, making it easier for people to move around, and promoting social interaction (as per Para. 7.2.8 of *Manual for Streets*, Department for Transport, 2007). For this to happen, parking "needs to be controlled," so as to "take place in designated areas," to avoid the following common mistakes:

- *undifferentiated surfaces leading to poor parking behaviour;*
- *vulnerable road users feeling threatened by having no space protected from vehicles; and*
- *the positioning and quantity of planting, street furniture and other features creating visual clutter.*

7.121 For this reason, the Council's Highways officer advised that it is important that the area between the building frontages of plots B1 to A-G-1 are kept free of parked vehicles and of vehicles that need to pass each other. Therefore, blind and partially sighted pedestrians would be able to use the building lines of the frontages of the above plots, and wheelchair users would not be forced into the paths of passing vehicular traffic. A surfacing and materials plan would also need to be submitted to ensure that the proposed shared space area is safe for all road users. The application is generally considered acceptable in this regard, however should it be approved, a pre-commencement planning condition will be imposed requiring the applicant to manage the proposed development site so that motor traffic only enters the site from Edwin Road and only egresses it on to Crane Road. A similar pre-commencement planning condition will be imposed to be secured which requires the applicant to commit to keeping the area mentioned above free from parked vehicles.

7.122 Should the application be considered acceptable overall, the above conditions will be imposed in order to ensure the safety of pedestrian and cycle users within the shared space.

Refuse and Waste

7.123 Policy LP 24 of the Local Plan, the Council's Residential Development Standards SPD and the council's Refuse and Recycling Storage SPD requires that secure storage be provided on-site for refuse and recycling bins.

7.124 Houses with individual refuse containers will be provided with 240 litre refuse bins for three bedrooms or less, and houses with three or more rooms will be provided with 360 litre bins. Developments using communal refuse storage will be provided with a 70 litre bin per bedroom. Houses with up to two rooms will be provided with two 55 litre recycling boxes. Units with three or more bedrooms will vary as per the varying requirements for each individual property. The proposal is generally acceptable in this regard, however should it be approved this will be secured by way of conditions.

7.125 The submitted transport statement advises that refuse vehicles will enter the site via the repositioned shared space access from the northern side of Edwin Road and would then progress through the site in a northerly direction along the shared space access road which has a central area to be used by through traffic which

is 4m wide and would exit the site via the existing pedestrian access and egress and vehicular egress junction on to Crane Road. A vehicle tracking drawing has been submitted as part of the Transport Assessment Addendum which demonstrates that a refuse vehicle can enter the site from Edwin Road and egress it to Crane Road.

(vii) Energy and Sustainability

7.126 London Plan Policy 5.2 Minimising Carbon Dioxide Emissions states that proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor's energy hierarchy. Policy 5.2 further states that carbon dioxide reduction targets should be met on-site or where clearly demonstrated this is not possible the shortfall may be provided off-site or through a cash-in-lieu contribution to secure savings elsewhere.

7.127 Policy LP20 of the Local Plan states that the Council will promote and encourage development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property.

7.128 Policy LP22(A) requires all developments to achieve the highest standards of sustainable design and construction in order to mitigate against climate change. Applicants will be required to comply with the following:

1. Development of 1 dwelling unit or more, or 100sqm or more of non-residential floorspace will be required to comply with the Sustainable Construction Checklist.
2. Development that results in a new residential dwelling will be required to incorporate water conservation measures to achieve maximum water consumption of 11 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption).
3. New non-residential buildings over 100sqm will be required to meet BREEAM 'Excellent' standard.
4. Proposals for change of use to residential will be required to meet BREEAM Domestic Refurbishment 'Excellent' standard (where feasible).

7.129 Policy LP22(B) states that developers are required to incorporate measures to improve energy conservation and efficiency as well as contributions to renewable and low carbon energy generation. All new major residential development (10 units or more) should achieve zero carbon standards in line with London Plan policy guidance. All non-residential buildings over 100sqm would be expected to achieve a 35% reduction in carbon emissions. Targets are expressed as a percentage improvement over the target emissions rate (TER) based on Part L of the 2013 Building Regulations. This should be achieved by following the Energy Hierarchy:

1. Be lean; use less energy
2. Be clean: supply energy efficiently
3. Be green: use renewable energy

7.130 Policy LP22(D) states that all new development will be required to connect to existing DE networks where feasible. Applicants are required to consider the installation of low, or preferably ultra-low, NOx boilers to reduce the amount of NOx emitted in the borough. Local opportunities to contribute towards decentralised energy supply from renewable and low-carbon technologies will be encouraged where appropriate.

- 7.131 As per Policy LP22(A), completed Sustainable Construction Checklists for both the commercial and residential components of the development were submitted with the application. The commercial element provided a score of 63 which represents a B rating, indicating that the proposal would help to significantly improve the borough's stock of sustainable developments. The residential element provided a score of 62 (A rating) which suggests that the proposal would make a major contribution towards achieving sustainable development in Richmond.
- 7.132 A BREEAM Pre-Assessment has been submitted with the application, and achieves a score of 'Excellent' as required by the Council's policy guidance. This includes a reasonable margin so that this remains the case if some credits are lost at later stages.
- 7.133 Paragraph 6.3.14 states that there may be instances where it is not feasible for a development to achieve a 35% reduction in emissions. In such cases the applicant will need to demonstrate in an Energy Statement why the CO2 emissions target cannot be met on-site. Any shortfall in on-site reductions can be met through a cash-in-lieu contribution to the Council's Carbon Offset Fund, agreed through a Section 106 legal agreement in line with the Planning Obligations SPD. The Council has adopted the London Plan price of carbon which is £60 per tonne x 30 years equalling £1,800 per tonne of carbon. The GLA Draft Energy Assessment Guidance (April 2020) does state an expectation that SAP10 is considered for referable applications, however it does not state that SAP2012 must be considered for non-referable applications. Paragraph 5.3 states *"If the application is a non-referable development, then it will be down to the borough's discretion to decide which emission factors are used.* The Council's Sustainable Construction Checklist states that the SAP10 conversion factors should be used in line with GLA guidance. Therefore, the Council's Policy officer advised that for the purposes of this application the SAP10 conversion factor should be used.
- 7.134 The planning application was submitted with a completed Energy Statement prepared by Desco Ltd to demonstrate compliance with the above. This report demonstrates that cumulative carbon dioxide reductions on-site would be estimated to achieve 37%. This will be achieved through air source heat pumps will cater for the heating and water demands across the site, and solar PV panels will be installed to roofs throughout the site. This achieves the 35% requirement onsite reduction as set out in Council policies. Should the application be considered acceptable overall, a contribution to the Council's Carbon Offset Fund of ££122,075 (1285 tonnes over 30 years = £122,075) has been secured via the Unilateral Undertaking. This amount is in accordance with the Council's policy guidance.
- 7.135 The application has been reviewed by Climate Integrated Solutions who worked on behalf of the Council to review the sustainability component of developments. After negotiations surrounding matters relating to green roofs, PV panels and heat loss, and the Carbon Offset Contribution it was concluded that the proposal could be supported from a sustainability perspective.

(viii) Air quality

- 7.136 The entire borough has been designated an 'Air Quality Management Area' (AQMA) for both nitrogen dioxide (NO₂) and PM10 (particles less than 10

microns). Therefore, the potential exposure of new sensitive receptors (new occupants) to existing sources of air pollution would need to be considered.

- 7.137 An air quality assessment has been submitted by WSP Ltd as part of the proposal, to demonstrate how the final scheme protects the proposed residential accommodation from external air pollution and how appropriate mitigations would be incorporated into the final build. It was concluded within the report that the proposed development is not air quality neutral for transport emissions, and as such mitigation will therefore be required. A mitigation strategy has been proposed within the Transport Assessment which would offset emissions, and it was advised that the development proposals would meet all national, regional and local policies for air quality with the application of this mitigation.
- 7.138 Should the proposal be considered acceptable overall, an amount of £14,100 towards the Council's Air Quality Action Fund has been secured via the Unilateral Undertaking. This amount has been agreed by the Council's Air Quality Officer.

(ix) Flood Risk and Drainage

- 7.139 Policy LP21 of the Local Plan highlights 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. Unacceptable developments and land uses will be refused in line with national policy and guidance and the Council's Strategic Flood Risk Assessment (SFRA).
- 7.140 The area is in Floodzone 2/3/3A due to its proximity to the River Crane and the risk of flooding is therefore considered to be highly likely. The Council's SFRA for Zone 3A restricts land uses to Water Compatible, Less Vulnerable and More Vulnerable development. Future development in Zone 3A and Zone 2 will only be considered if the Sequential Test has been applied in accordance with national policy and guidance. The Exception Test will be required for more vulnerable development. A Flood Risk Assessment is required for all development proposals.
- 7.141 The applicant has submitted a Flood Risk Assessment by Waterman Infrastructure & Environment Ltd. This report indicates that the site is at low risk of fluvial, tidal and pluvial flooding, and groundwater and artificial sources. Tests of the ground conditions confirmed they are unsuitable for discharge to ground, however surface water could be discharged to the River Crane via pumped discharge. In order to restrict this runoff, 406m³ of storage would be provided in the sub-layer of the proposed permeable paving located below the access road and parking areas. Treatment would be provided by the green roof and permeable paving to ensure that the quality of surface water discharged to the River Crane is acceptable. Foul flows from the site would be discharged from the site by gravity to the Thames Water combined sewer network. This would be at an appropriate rate calculated using the water consumption method.
- 7.142 In line with the Council's requirements, it is noted that no basement development for self-contained units is proposed. It is further noted that as part of the report, it was noted that after further testing the site is determined to be within Floodzone 1 due to its low probability of flooding, and as such the sequential test required by Policy LP21 is passed by default and the exception test is not required.

- 7.143 The Council's Highways Asset Co-ordinator reviewed the application and raised no objections to the application in light of the above methods for run-off to the river, and subject to Environment Agency approval.
- 7.144 The Environment Agency were consulted regarding the application, and following a request for amendments to the application it was advised that their initial objection was removed. This was due to the widening of the proposed natural corridor beside the river which would provide a buffer zone to the river, acting as additional filtration for surface water runoff.
- 7.145 Overall the report demonstrates the development is at a relatively low level of flood risk, and that surface water runoff can be managed to ensure that flood risk is not increased elsewhere. As such the proposal is considered to comply with Policy LP21.

(x) Land Contamination

- 7.146 Policy LP10 of the Local Plan states that the Council promotes the remediation of contaminated land where development comes forward. Potential contamination risks will need to be properly considered and adequately mitigated before development proceeds.
- 7.147 Given the site's past and current uses, there is a strong likelihood that the site incorporates contaminated land. The various past industrial land uses include gravel pits, electricity works, garage services, tanks and distribution, and the current bakery.
- 7.148 In line with the Council's requirements, a Phase 1 Environmental Assessment (Ref. 4609-1; February 2019) and a Phase 2 Geoenvironmental Investigation (Ref. 4609-2; February 2019) by AP Geotechnics were submitted in support of the application. Various potential contaminants were identified through both on and off site uses. The Phase 2 Environmental Site Investigation included an assessment of potential contamination in soils, groundwater and from ground gases. The report concluded that the subsoil currently onsite is unsuitable for the proposed residential end use, although it is noted that no asbestos was identified in any of the various samples, as was raised as a concern in some of the objection comments.
- 7.149 The Council's Scientific Officer reviewed the application and advised that, given the sensitivity of the proposed development, a standard contaminated land condition DV29F (parts 1b and 2) would be recommended to be applied to any planning permission granted in order for further monitoring and investigation to take place and to remediate the site. Should the application be considered acceptable overall this would have been secured by condition.

(xi) Ecology, Biodiversity and Trees

- 7.150 Policy LP15 of the Local Plan requires all developments to protect and the enhance Borough's existing biodiversity and incorporate new biodiversity features and habitats into the design of site and buildings themselves.
- 7.151 Policy LP16 requires that the borough's trees and landscape will be protected and enhanced. The policy notes that where trees are felled, the Council will normally require that an appropriate replacement be planted. It is also important to note that "landscape" refers to the design of all space between buildings, and includes walls and boundaries and paving materials, as well as planting.

- 7.152 Policy LP17 sets out that all developments with roof plate areas of 100sqm or more should aim to incorporate at least 70% of any roof plate area as green and/or brown roofs. Technical feasibility and considerations of visual impact should be considered.
- 7.153 The OSNI designated land to the north denotes that the area has been identified as having the potential to have enhanced biodiversity. It is therefore noted that the promotion of nature conservation should be treated as integral to development of the site.
- 7.154 The applicant submitted an Ecology report by Richard Graves Associates, which incorporated a phase 1 Habitat survey. This report reviews the biodiversity within and near the site and it is noted that the existing site comprises mostly buildings and hardstanding, with very limited vegetation cover. It concludes that the proposed development seeks to protect and enhance the wildlife corridor created by the river to the north of the site by avoiding excessive light, enhancing the riverside edge landscape, providing nesting opportunities for bird life and roosting opportunities for local bats. Within the site, bat roosts and bird nests are proposed, particularly on the proposed green roofs.
- 7.155 The Environment Agency were consulted regarding the application, and following a request for amendments to the application it was advised that their initial objection was removed. This was due to the widening of the proposed natural corridor beside the river which would provide a 5m buffer zone to the river, along with providing a habitat for wildlife.
- 7.156 The northern boundary of the site is known to support a variety of protected species and provides a key 'dark corridor' within which wildlife can shelter, commute and forage. The Council's Ecologist reviewed the application including the submission documents. Although an 8m buffer zone was initially requested beside the river, it was advised that the Council would accept less if a natural / unlit approach is taken. As such the applicant submitted revised plans for a natural 5m wide buffer zone in line with both our Ecologist's and the Environment Agency's advice. The revisions included the removal of some 15 car parking spaces, the riverside strip widened and an increase in the number of hedges and tree planting. It is noted that this area is already hard landscaped, and the introduction of green soft surfacing serving wildlife habitats along the riverside is a significant improvement and meets the Council's policies for enhancing biodiversity and nature conservation interests.
- 7.157 In terms of lighting, this is detailed in a Lighting report by Desco Ltd. This was considered as part of the Ecology report which noted that an external lighting strategy has been formulated to avoid and, where this is not possible for security reasons, minimise light trespass on the River Crane Corridor so that it can continue to function as a 'dark corridor'. This strategy was noted to be in accordance with NPPF principles. The lighting of the buffer zone was reviewed by the Council's Ecologist. After an initial review it was advised that the buffer strip must be unlit and the lights set in the riverside wall facing away from the river in order to reduce light spill and provide dark foraging habitat for bats. Following revisions the Council's Ecologist advised that the light levels on the river arising from this development have almost halved since the original submission, and whilst not reaching the levels set out in NPPF guidance, they are very close and given that the bats that were recorded here were all light tolerant species he is satisfied with the changes made in respect to lighting on the river. The light levels in the 5m buffer zone are noted to be higher than the

0.5 lux maximum the guidance asks for; it has an average of 1.08 lux and a maximum of 2.9 lux in an area of generally higher lux at the west end in front of the smaller, lower block. In order to overcome this, low-transmittance glass (or other light attenuation solution) has been agreed to by the Applicant as a mitigation measure for the northern elevation windows facing the river and is captured in the submitted Unilateral Undertaking

- 7.158 The proposal involves the introduction of 200m² of green living roofs, along with the introduction of new and additional trees throughout the site. As per the image below, green roofs are proposed to some of the apartment buildings within the centre of the site. This will create a habitat for a variety of plants, birds, animals and invertebrates. The 200m² of green roofs would not comply with Policy LP17 which recommends that 70% of any roof plate area within a site consist of a green/brown roof. However, the majority of roofs including all the townhouses are pitched or mansard in style and therefore unsuitable for green or brown roofs. The applicants advised they were designed like this to give a varied roofscape and best fit with the existing townscape and surrounding character of the area. On the apartments where roofs are flat, they have all been allocated as green or brown roofs or as residential roof terraces, which can incorporate elements of planting. Currently the residential terraces have not been allocated green living roofs as it was considered the amount of planting in this is minimal due to the small size of roofing available area. The east terrace of houses each have a small area of flat roof, however brown/green roof here has been dismissed due to the difficult maintenance requirements for a relatively small area. The Council's Ecologist reviewed this matter and considered the 200m² to be acceptable due to the limited area of roof space available for additional green roofing in order to retain a coherent urban design, as described above. Therefore, the Council raises no objection to this matter.



Green roof diagram

- 7.159 Finally, it is noted that the applicant has agreed via the Unilateral Undertaking to pay a river restoration contribution amounting to £50,000. This would be used towards improvements to the River Crane between Kneller Gardens and Twickenham Rough pursuant to policy LP18A of the Local Plan.

7.160 In light of the above, there is considered to be an improvement in biodiversity across the site, and overall the proposal is considered to be an adequate enhancement to meet the requirements of Policies LP15, LP16 and LP17.

(xii) Archaeology

7.161 Policy LP7 of the Local Plan states that the Council will seek to protect, enhance, and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public. The necessary measures to safeguard archaeological remains will be taken. The Greater London Archaeological Advisory Service (GLAAS) are the borough's archaeological advisors and will generally be consulted with regard to planning applications involving archaeological matters.

7.162 GLAAS were consulted as part of the application. A letter of response dated the 8th of April 2019 advised that that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. The site is located within an archaeological priority area, however the existing buildings are likely to have removed any earlier archaeological remains when they were constructed.

7.163 On this basis, there is considered to be a low risk of harm to archaeological interests and had the application been recommended for approval, could have been protected by an appropriate condition.

8. OTHER MATERIAL CONSIDERATIONS

Housing Land Supply

8.1 Paragraphs 10 and 11 of the NPPF set out that there will be a presumption in favour of Sustainable Development. The latter paragraph states that:

For decision-taking this means: approving development proposals that accord with an up-to-date development plan without delay; or 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.*

8.2 Footnote 7 of the NPPF (2019) clarifies that:

'out-of-date policies include, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer..).'

8.3 At the time of writing, the Council is able to demonstrate more than 5 years of housing land supply including buffer and has a Local Plan which has been adopted within the last five years. Therefore, for the purpose of determining this

planning application, the LPA is able to demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer). The ordinary planning balance having regard to the statutory test in section 38(6) of the 2004 Act is therefore engaged.

Local Finance Considerations

- 8.4 The site is liable for Community Infrastructure Levy (CIL).
- 8.5 Mayoral Community Infrastructure Levy (CIL): The estimated amount of Mayoral CIL for this development is £983,717.48 in accordance with the Mayor's CIL 2 Charging Schedule (MCIL2) that took effect on 1st April 2019. The actual amount of CIL can only be confirmed once all relevant details are approved and any relief claimed.
- 8.6 Richmond Community Infrastructure Levy (CIL): The estimated amount of Richmond CIL for this development is £3,231,707.14. The actual amount of CIL can only be confirmed once all relevant details are approved and any relief claimed.

Community Infrastructure Levy (CIL) estimate – Pre-relief	
Mayoral CIL	£983,717.48
Borough CIL	£3,231,707.14

Community Infrastructure Levy (CIL) estimate – Post relief (social housing)	
Mayoral CIL	£665,940.34
Borough CIL	£2,170,677.18

9. PLANNING BALANCE AND CONCLUSION

- 9.1 Paragraph 11 of the NPPF explains how the presumption in favour of sustainable development applies. It is considered that the 'ordinary' balance should be applied, this means clearly identifying that the proposal complies with the development plan and the weight given to the material planning considerations. The Framework requires the approval of development proposals that accord with an up-to-date development plan without delay. The presumption in favour of sustainable development requires proposals to achieve economic, social and environmental gains; as such a balancing exercise has to be undertaken to weigh the benefits of the scheme against its disadvantages.
- 9.2 In terms of the economic dimension of sustainable development, the proposal would involve some job creation, both during the construction phase and in the longer term through the additional population assisting the local economy through spending on local services/facilities. There will also be Council Tax receipts arising from the development, and 175sqm of flexible commercial floorspace is proposed. However, there would be a significant reduction of existing industrial and ancillary office space at a site designated as being Locally Important Industrial Land. This would be highly detrimental to long term employment opportunities in an accessible location within the borough, which would result in significant economic harm given the current shortage of commercial/employment floorspace, despite the short-term job creation through construction and the replacement flexible commercial floorspace.

- 9.3 Regarding the social dimension, in terms of physical constraints, with the exception of noise, which has already been discussed in previous sections of the report, the site appears to have no other physical constraints and is deliverable. There is a local and borough wide identified need for affordable housing, this carries significant weight and there would nevertheless be a net benefit in social terms. Whilst the Council can demonstrate a 5 year supply of deliverable housing land, the 40% provision of additional affordable housing on the application site secured under the Unilateral Undertaking would amount to a moderate benefit in terms of providing a greater flexibility to the supply of housing. Furthermore, the proposal will enable public access to the River Crane at the northern end of the site to the public through provision of high-quality landscaping and playspace.
- 9.4 In terms of the environmental dimension of sustainable development, the proposal offers potential for the incorporation of significant improvements to energy efficiency as well as additional planting and habitat enhancement. In particular, the proposal involves the provision of rooftop PV panels, a riverside green buffer zone, green roofs, air source heat pumps, efficient mechanical ventilation, efficient lighting, sub-metering to mechanical plant and controlled heating. The development provides a 37% improvement on Part L Building Regulations and provides an offset payment to meet zero carbon targets. BREEAM 'Excellent' is targeted for the affordable workspace. Electric car charging points are integrated into the proposal to ensure future-proofing. The site currently comprises a walled off industrial site, with poor quality buildings. The proposed development has been carefully designed and is considered to relate to the scale and grain of the local area. Overall, building heights are considered to be acceptable and the proposed architecture and landscape design is high quality which will improve the local townscape and street scene from a visual perspective. There will also be improvements to the amenity of neighbouring residents by removing the existing industrial use, particularly in relation to noise disturbance, while minimising impact to neighbour amenity in terms of daylight/sunlight, outlook and privacy.
- 9.5 A Unilateral Undertaking has been agreed with the applicant to mitigate impacts arising from the proposal, including financial contributions:
- 46 units of affordable housing
 - 175sqm of affordable office workspace;
 - Contribution towards off-site playspace (£45,747 Indexed) for 5-11 year olds
 - Contribution towards off-site playspace (£25,415 Indexed) for 12 year olds and over
 - Playspace maintenance fees (£8,487 and £4,715);
 - Contribution to public open space (£27,500)
 - Payment towards Richmond's carbon offset fund (£122,075) and post-construction review;
 - Contribution to Richmond's Air Quality Action Fund (14,100);
 - Contribution towards in-river channel works (£50,000);
 - Local Employment Agreement for the construction process;
 - Public right of way through the site to allow pedestrians and cyclists to access the riverside walkway;
 - Restriction on resident access to car parking permits in the CPZ;
 - Provision of 5 years of free car club membership to residents of the development.
 - Provision of car club bay on Edwin Road
 - Agreement of detailed layout and fit out of wheelchair accessible units with the Local Planning Authority

- Use of low-transmittance glass (or other light attenuation solution) to glazing facing the River Crane, details to be approved by Local Planning Authority
- Monitoring Fee (£13,670)
- Legal Fees (£2000)

9.6 Having fully assessed all three dimensions of sustainable development; economic, social and environmental within this report it is concluded that, on the whole the development of this site will:

- significantly reduce employment, industrial and office floorspace across the site, to the detriment of the employment land around the borough given the existing shortage of available employment floorspace and employment opportunities;
- would provide a supply of affordable housing to meet current and future generations but in the absence of review clauses cannot be confirmed to be maximising affordable housing provision on site;
- has an acceptable design and impact on the character of the area;
- has an acceptable impact on residential amenity;
- has an acceptable impact upon highway and pedestrian safety;
- maximise the available opportunities for use of public transport, walking and cycling;
- maximises sustainability measures;
- manages flood risk and drainage effectively;
- has no significant adverse impacts on features of landscape or ecological value;
- provides infrastructure to meet the needs generated by the development.

9.7 When considered in the round, the proposal would result in significant improvements to the environmental and social dimensions of sustainability, however when considering the existing situation on the site it would not improve the economic dimensions. The environmental improvements are not insubstantial, , however on balance, this is not considered to outweigh the economic harm to the borough due to the loss of employment and industrial floorspace. As demonstrated earlier in this report, the Borough is in chronically short supply of industrial land in particular, with demand for space significantly outstripping available supply.

9.8 Paragraph 12 of 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. Furthermore, paragraph 80 of the NPPF states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Overall the benefits of the proposal are acknowledged and supported, however these are not considered sufficient to swing the planning balance due to the economic harm to the borough.

9.9 For the reasons set out above, this application falls to accord with the test under section 38(6) of the 2004 Act, as the proposal does not conform with all parts of the Development Plan and the benefits are not considered to be of sufficient weight to justify approval.

RECOMMENDATION: The application is therefore recommended for REFUSAL for the following reason:

1. Loss of Industrial Floorspace:

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 and 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).

2. Affordable Housing:

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.

10. INFORMATIVES RECOMMENDED FOR INCLUSION IF RECOMMENDTION FOR REFUSAL IS AGREED

Decision drawing numbers

For the avoidance of doubt the Drawing(s) No(s) to which this decision refers are as follows:-

A2871 200 R23, A2871 201 R22, A2871 202 R21, A2871 202 R21, A2871 203 R22, A2871 204 R22, A2871 205 R25, A2871 401 R22, A2871 402 R22, A2871 606 R22, A2781 610 R23, A2871 612 R2, A2871 613 R23, A2871 614 R23, A2871 615 R23, A2871 616 R23, A2871 617 R23, A2871 654 R23, A3164 1000 P3, A3164 1005 P8 – received: 20/07/2020
70027521-SK-27-P01, 70027521-SK-26-TR1-P01, 70027521-SK-26-P02 – received: 16/07/2020
A2871 200 R22, A2871 641 R22 – received: 15/07/2020
A2871 950 R1, A2871 951 R1, A2871 952 R1, A2871 953 R1, A2871 954 R1 – received: 09/07/2020
A2781 SK997 R1, A2781 SK997 R1 - received: 08/07/2020
A2871 621 R22, A2871 630 R22, A2871 631 R22 - received 24/06/2020
A2871 601 R21, A2871 602 R21, A2871 603 R21, A2871 604 R21, A2871 605 R21, A2871 608 R21, A2871 609 R21, A2871 620 R21, A2871 650 R21, A2871 651 R21, A2871 652 R21, A2871 653 R21, A2871 1000 R21, A2871 1001 R21, A2871 1002 R21 - received 04/11/2020
A2871 001 R20, A2871 002 R20, A2871 100 R20, A2871 101 R20, A2871 102 R20, A2871 103 R20, A2871 103 R20, A2871 105 R20, A2871 106 R20, A2871 120 R20, A2871 121 R20, A2871 122 R20, A2871 205 R20, A2871 607 R20, A2871 621 R20, A2871 640 R20 - received: 28/02/2019
Unilateral Undertaking received 24.07.2020

NPPF REFUSAL- Para. 38-42

In accordance with paragraphs 38-42 of the National Planning Policy Framework, Richmond upon Thames Borough Council takes a positive and proactive approach to the delivery of sustainable development, by:

- {\b o} Providing a formal pre-application service
- {\b o} Providing written policies and guidance, all of which is available to view on the Council's website
- {\b o} Where appropriate, negotiating amendments to secure a positive decision
- {\b o} Determining applications in a timely manner.

In this instance the applicants sought formal pre-application advice, however, this was not followed and the scheme remained contrary to policy and guidance, and after exhaustive negotiations, was referred to the first available Planning Committee, where the agents / applicants had an opportunity to present the case. The Planning Committee found the scheme was contrary to policy and guidance, and subsequently refused the application. The Council is ready to enter into formal pre-application discussions to advise the applicants of relevant policy and guidance; and where possible assist in the preparation of a new planning permission.