

# Local Plan Statement of Consultation Part II – Appendix 2J

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Planning

*24 May 2017*

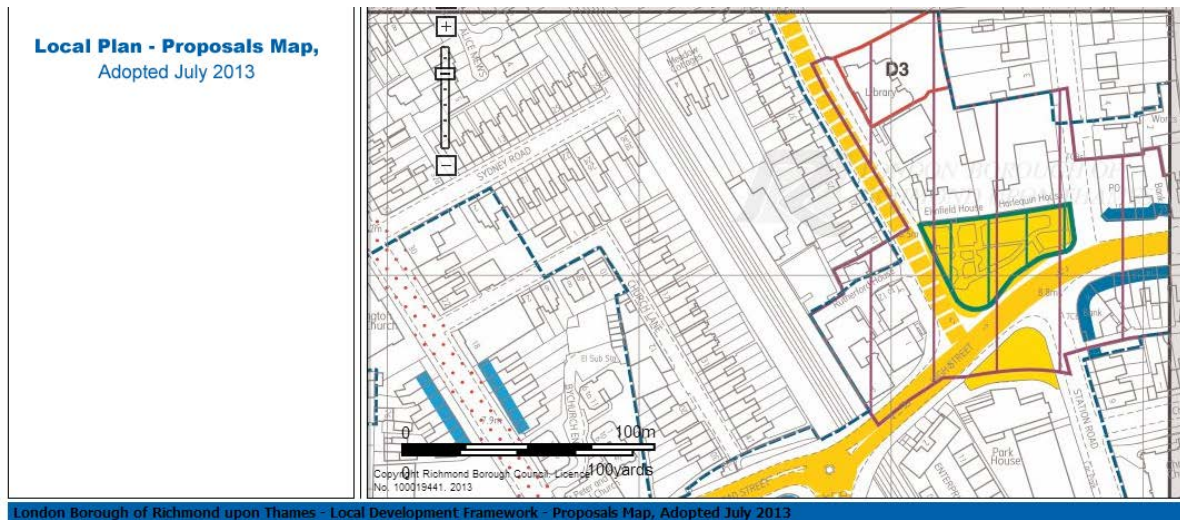
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Index of Appendices to all Publication Comments

Respondent (in alphabetical order by main or first respondent name) (grey highlight was a late response)	Consultation Event and Objective Comment IDs	Appendix
Melanie Spencer, 3rd Teddington Scout Group	Proposals Map Changes: 74	1
Rob Shrimplin, Shrimplin Brown on behalf of CLS Holdings Plc	Publication Local Plan: 225, 226	2
Matt Richards, Bidwells on behalf of Curzon St Ltd	Publication Local Plan: 243, 244, 245, 246	3
Samantha Powell, Education Funding Agency	Publication Local Plan: 253, 254, 255, 256, 257	4
James Cogan, GL Hearn on behalf of Evergreen Investment Retail Company	Publication Local Plan: 409, 410, 411, 412, 413, 414, 415, 416, 417	5
Michael Fasosin	Publication Local Plan: 156, 157	6
Jonathan Manns, Colliers International on behalf of Greggs PLC	Publication Local Plan: 335, 336	7
Katharine Fletcher, Historic England	Publication Local Plan: 340, 341, 342, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366	8
Rebecca Doull, GVA on behalf of Lady Eleanor Holles School	Publication Local Plan: 318, 321	9
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Ziyad Thomas, The Planning Bureau Ltd on behalf of McCarthy & Stone Retirement Lifestyles Ltd	Publication Local Plan: 333, 334	11
Mark Underwood, Deloitte Real Estate on behalf of Metro Bank PLC	Publication Local Plan: 272	12
Max & Emma Millington	Publication Local Plan: 367, 368, 369, 370, 371, 372, 373, 374, 376, 377, 378, 379; Sustainability Appraisal: 16	13
Richard Boother, RPS on behalf of Mr S Oxley	Publication Local Plan: 283; Proposals Map Changes: 83	14
Harry Spawton, Gerald Eve on behalf of Jonathan Smith, Penney Limited	Publication Local Plan: 320	15
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Sally Arnold, Planning Potential Ltd on behalf of Power Leisure Bookmakers Ltd	Publication Local Plan: 228, 229, 230, 231, 232	17
Robin Meakins, Barton Willmore on behalf of Quantum Group	Publication Local Plan: 324, 330; Proposals Map Changes: 98	18
Neil Henderson, Gerald Eve LLP on behalf of Reselton Properties Ltd	Publication Local Plan: 293, 294, 298, 303, 304, 305, 306	19
Tanja El Sanadidy, Indigo Planning Ltd on behalf of Shepherd Enterprises Ltd	Publication Local Plan: 290, 291, 292	20
Dale Greetham, Sport England	Publication Local Plan: 396, 397, 398, 399, 400	21
James Stevens, Home Builders Federation Ltd	Publication Local Plan: 202, 203, 204, 205, 206, 208, 209, 210, 211, 212, 213, 214, 215	22
Judith Livesey, Nathaniel Lichfield & Partners on behalf of St Paul's School	Publication Local Plan: 331; Proposals Map Changes: 87	23
David Taylor	Publication Local Plan: 395	24
Catherine Mason, Savills on behalf of Thames Water Property	Publication Local Plan: 265, 266	25
David Wilson, Savills, on behalf of Thames Water Utilities	Publication Local Plan: 174, 177, 178, 419, 420	26
Kevin Goodwin, RPS CgMs on behalf of Mr Malachi Trout	Publication Local Plan: 287	27
Greg Pitt, Barton Willmore on behalf of UK Pacific Hampton Station	Publication Local Plan: 289	28
Kevin Goodwin, RPS CgMs on behalf of Goldcrest Land	Publication Local Plan: 277	29







Extract from adopted Local Plan Proposals Map (Harlequin House in top right hand section)



Harlequin House (looking northwards along Elmfield Avenue)





Harlequin House (looking southwards along Elmfield Avenue)



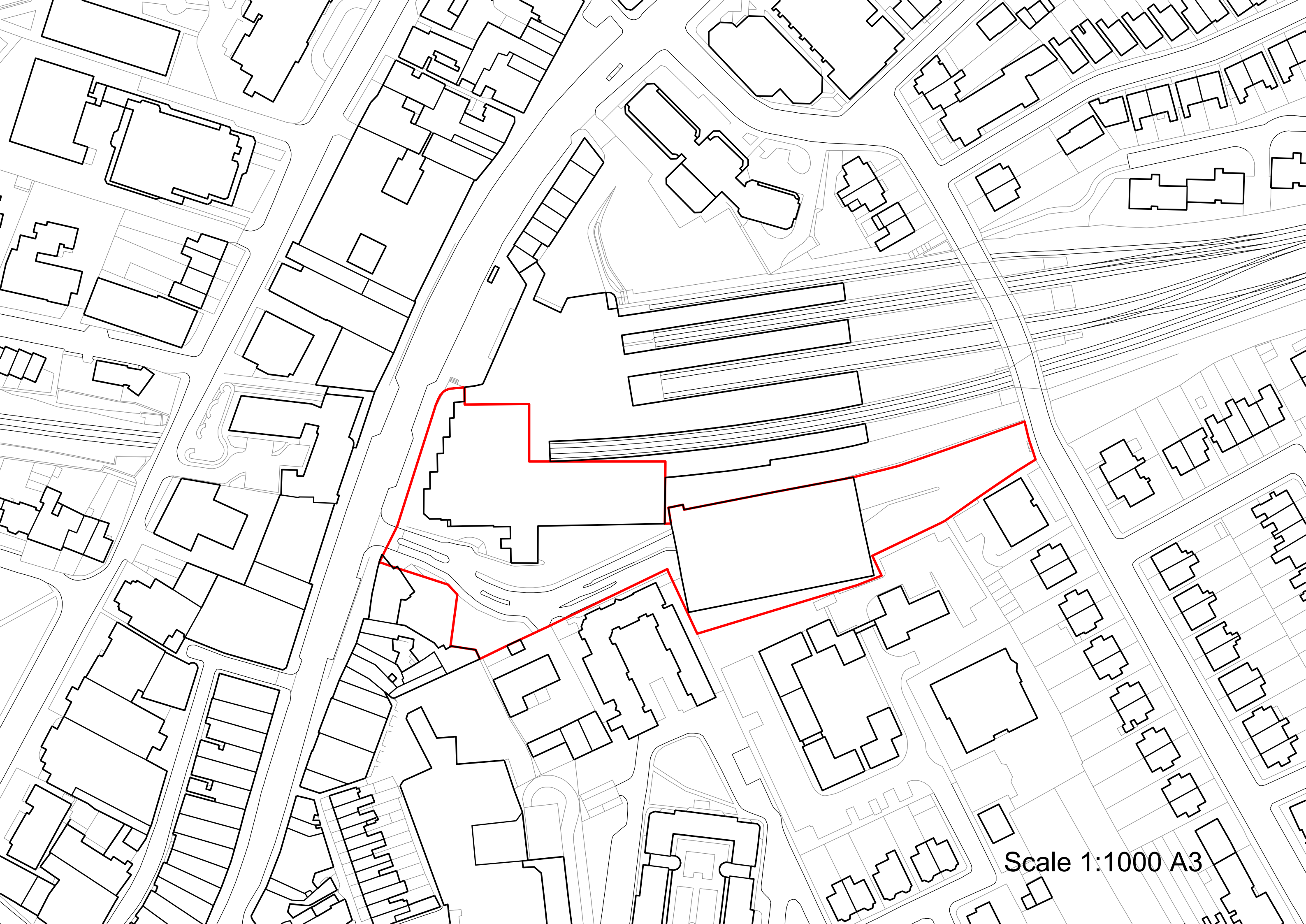
Harlequin House (looking eastwards along Teddington High Street)

Site reference	Use	Within a centre?	Other
SA3 Hampton Traffic Unit, 60-68 Station Road, Hampton	Business (B1), employment generating and other commercial or social and community infrastructure uses.	Hampton Village Local Centre	The whole building is a Building of Townscape Merit and should be retained.
SA4 Hampton Delivery Office, Rosehill, Hampton	Employment generating or social and community infrastructure uses. Residential uses may also be appropriate as part of a mixed use scheme.	Out of centre	If the site is declared surplus to requirements.
SA5 Telephone Exchange, Teddington	Commercial/retail on the ground floor with some employment including B1 offices. A mixed use scheme with residential could be considered.	Teddington District Centre	If the site is declared surplus to requirements
SA6 Teddington Delivery Office, Teddington	Commercial/retail on ground floor with some employment including B1 offices. A mixed use scheme with residential could be considered.	Teddington District Centre	If the site is declared surplus to requirements  Retain the Building of Townscape Merit
SA11 Twickenham Stadium, Twickenham	Employment, such as offices or a business park. Mixed use scheme with residential could be considered.	Out of centre	If part of the site is declared surplus to requirements
SA13 Telephone Exchange, Whitton	Employment including B1 offices, and social infrastructure or other main centre	Whitton District Centre	If the site is declared surplus to requirements

	uses.		
SA14 Kneller Hall, Whitton	Residential, employment including B1 offices, and employment generating uses as well as social infrastructure.	Out of centre	If the site is declared surplus to requirements
SA19 Richmond Station, Richmond	Retail, employment, social infrastructure and community uses, residential.	Richmond Town Centre	
SA24 Stag Brewery, Lower Richmond Road, Mortlake	Educational, residential, employment including B1 offices, commercial, community, sports/leisure.	Out of centre	
SA25 Mortlake and Barnes Delivery Office, Mortlake	Employment, retail.	Out of centre	If the site is declared surplus to requirements
SA27 Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen	Employment, commercial, community, social infrastructure	East Sheen District Centre	If the site is declared surplus to requirements

Excludes SA1 where employment is limited to “local business uses” and SA2 which is specific to “the island’s unique employment and business uses”.



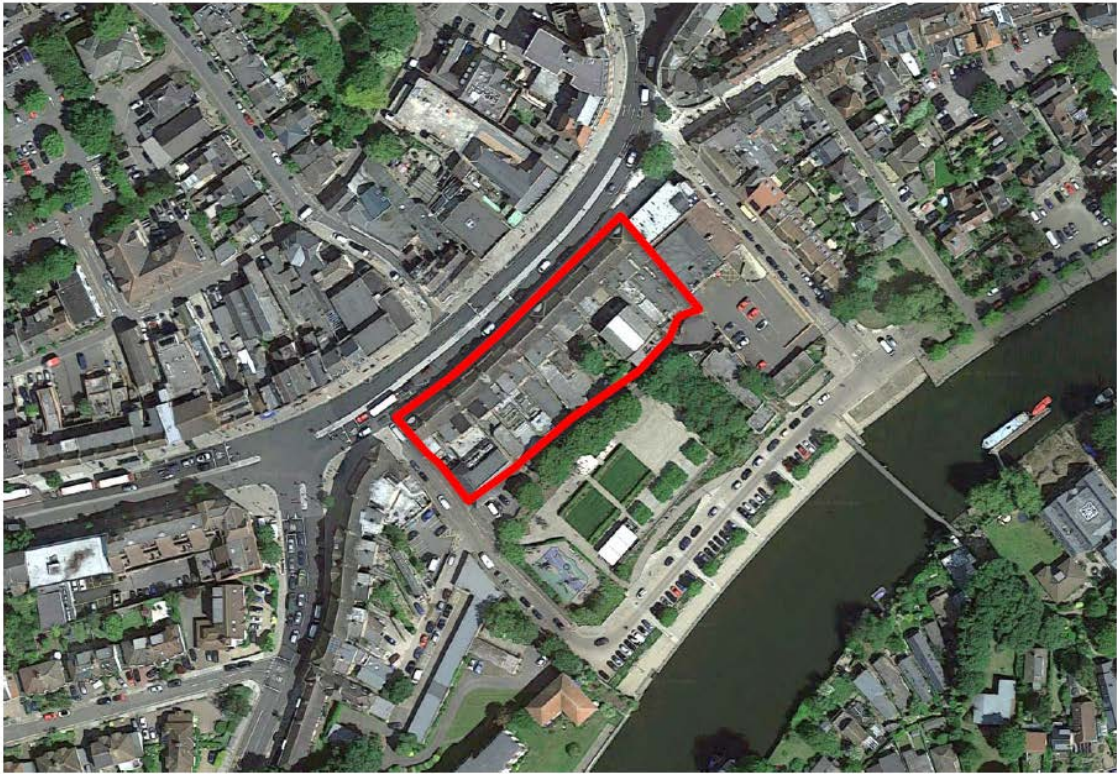


Scale 1:1000 A3





**Figure 1: 3-33 King Street, Twickenham**





## Policy LP 8

### Amenity and Living Conditions

All development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. The Council will:

1. ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development, where existing daylight and sunlight conditions are already substandard, they should be improved where possible;
2. ensure ~~there is a minimum distance of 20 metres~~ *appropriate separation* between main facing windows of habitable rooms (this includes living rooms, bedrooms and kitchens with a floor area of 13sq.m or more) to preserve the privacy of existing properties affected by the new development;
3. ensure balconies ~~does do~~ not raise unacceptable overlooking or noise or disturbance to nearby occupiers;
4. ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting, including through creating a sense of enclosure;
5. ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climatic effects.

Applicants are expected to comply with the Council's SPDs relating to design, including Village Planning Guidance, SPDs on extensions, infill and backland developments, housing mix and standards as well as residential development standards.

## Policy LP 34

### New Housing

- A. ~~The Borough's target is 3,150 homes for the period 2015-2025. This target will be rolled forward until it is replaced by a revised London Plan target. The Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies. The Richmond Local Plan will provide for 20,940 new dwellings between 2013 and 2033, in accordance with the Strategic Housing Market Assessment.~~
- B. ~~The following amounts of housing are indicative ranges in these broad areas of the borough to 2025; New residential development is to be focused towards the following existing centres in accordance with the 'Strategic Vision'.~~

Area	Wards	Approx. No of units
Richmond	Ham, Petersham and Richmond Riverside; South Richmond; North Richmond; Kew	1000-1050
Twickenham	Twickenham Riverside; St Margrets and North Twickenham; South Twickenham; West Twickenham	1000-1050
Teddington and the Hamptons	Hampton North; Hampton; Fulwell and Hampton Hill; Teddington; Hampton Wick	650-700
East Sheen	East Sheen; Mortlake and Barnes Common; Barnes	400-500
Whitton	Whitton; Heathfield	100

~~Original~~Suggested amended text

8.2.11

Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan:

Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college

Stag Brewery, Mortlake: provision of a new ~~6~~2-form of entry ~~secondary~~primary school, ~~including sixth form~~

Ryde House, East Twickenham: provision of a new 2-form of entry primary school

Barnes Hospital, Barnes: provision of 2-form of entry primary school

13.1.7 A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population.

Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses:

Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college

Stag Brewery, Mortlake: provision of a new ~~6~~2-form of entry ~~secondary~~primary school, ~~including sixth form~~

Ryde House, East Twickenham: provision of a new 2-form of entry primary school

Barnes Hospital, Barnes: provision of 2-form of entry primary school

SA 24 Stag Brewery, Lower Richmond Road, Mortlake

The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new ~~6~~2-form entry ~~secondary~~primary school, ~~plus sixth form~~, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and ~~/or re-provision and~~ upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.

- The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities.
- The brewery operations on this site have ceased at the end of 2015; the site has been marketed and sold.
- There is a need to create a new village heart and centre for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities.
- There is a clear need for a new ~~6-form-of-entry secondary~~primary school, ~~plus a sixth form,~~ in this area, ~~as set out in the Council's School Place Planning Strategy.~~ Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.
- Whilst this site is not located within a main centre, it falls within the Mortlake Area of Mixed Use. Therefore, it is expected that this site will provide a substantial mix of employment uses (B uses), including lower cost units suitable for small businesses, creative industries and scientific and technical businesses including green technology. Other employment generating uses will also be supported.
- Retail and other commercial uses, such as cafés and restaurants, will add to the vibrancy of the new centre as well as contributing to the provision of important local employment opportunities.
- Incorporating a mix of uses, including social infrastructure and community as well as leisure, sport and health uses, and attractive frontages would contribute to creating an inviting and vibrant new centre.
- The provision of residential uses (including affordable housing), will ensure that the new village heart becomes a vibrant centre for new communities.
- The site is partially within the Mortlake Conservation Area. The existing Buildings of Townscape Merit should be retained; the reuse of these historic buildings offers an excellent opportunity to ensure the site incorporates and promotes a cultural and historic legacy, for example by providing an on-site museum. Any development should respond positively to the Conservation Area, including the setting of the listed buildings (Grade II) to the north of the site.
- Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community.
- There may be an opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site. The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where possible improvements to public transport facilities can be secured as part of any development proposal.
- Guidance on design and local character for the area is also set out in the Mortlake Village Planning Guidance SPD.

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# London Borough of Richmond Local Plan: Publication Consultation

REPRESENTATIONS SUBMITTED ON BEHALF OF GREGGS PLC  
IN RESPECT OF  
GREGGS BAKERY, GOULD ROAD, TWICKENHAM TW2 6RT

FEBRUARY 2017

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# 1 INTRODUCTION AND BACKGROUND

Colliers International is instructed by Greggs PLC (hereafter “Greggs”) to make representations on their behalf in respect of the Publication Local Plan consultation document. This work has been supported by Landmark Chambers.

These representations are therefore intended to summarise Greggs current position, but also to signpost issues of particular concern which Colliers International and Landmark Chambers wish to explore in greater detail at the Examination in Public.

The representations comment specifically on issues of legal and procedural compliance, primarily the “soundness” of the Plan and the “Duty to Co-operate”. They should be read in conjunction with responses made by Greggs to previous draft development plan consultations, which are summarised in the table below.

Consultation Document	Date
Call for Sites	January 2013
Site Allocations Plan DPD	November 2013
Scoping Consultation	April 2016
Pre-Publication Local Plan	August 2016

Copies of each consultation response are appended to these representations for reference purposes. Specific reference is made to each in the context of the Plan’s soundness at the appropriate point.

Greggs have an interest in the Plan as the freehold owner of land at Gould Road, Twickenham. The property does not possess the requisite fitness for purpose and this could not be resolved through an application to redevelop the site in accordance with policy. The adopted and emerging policies are self-contradictory to the extent that Greggs have shown a redevelopment would result in a loss of floorspace in order to address highways and amenity issues.

These representations relate specifically to the land in question at Gould Road. They have regard to both the proposed allocation of this for employment purposes within the 'West Twickenham cluster (including Greggs Bakery and surroundings), Twickenham' and the extent to which the text of draft Policy LP42 would apply in consideration of its future.

**For the avoidance of doubt, Greggs strongly objects to the Borough's proposal to allocate their site as 'Locally Important Industrial Land'. Greggs also object to the proposed wording of draft Policy LP42.**

**Greggs consider that the draft plan has not been positively prepared and is unsound. It lacks soundness because it is not justified, effective or consistent with national policy. Greggs also consider that the draft plan is inconsistent with the London Plan.**

## 2 SOUNDNESS

The NPPF sets out at paragraph 182 that Local Plans will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. The Examination in Public is the next step in this instance. Greggs are mindful that a local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- **Positively Prepared:** The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified:** The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective:** The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities, and;
- **Consistent with national policy:** The plan should enable the delivery of sustainable development in accordance with the policies of the framework.

### Which of the soundness criteria does the Local Plan fail to meet?

Greggs consider that, a result of the approach set out at Policy LP42 “Industrial Land and Business Parks”, the Publication Local Plan does not meet any of the four soundness criteria set out by the NPPF.

We do not consider that the Publication Local Plan has been *positively prepared* as the thrust of the strategic vision and objectives has not been reflected by Policy LP42 “Industrial Land and Business Parks”, which sets out an overly restrictive and inflexible approach.

The approach to industrial land in the borough is not *justified* as it does not represent the most appropriate strategy for delivering new jobs in the borough and is not based on proportionate evidence.

It has also been demonstrated in previous representations that the allocation of the site for industrial use is unlikely to be *effective*, as the site is significantly

constrained, with limited prospects of any new purpose built accommodation being delivered.

We also consider that, as currently drafted, the proposed Policy LP42 results in the Publication Local Plan being unsound as it is in conflict with paragraphs 22 and 161 of the National Planning Policy Framework (NPPF). In this respect, the Publication Local Plan is not *consistent with national policy*.

Further detail demonstrating that the Publication Local Plan does not meet the tests of soundness outlined in the NPPF is set out in Section 3. Greggs also consider that the approach set out by Policy LP42 is inconsistent with the London Plan. Further justification in this respect is set out at Section 4.

### Why does it fail?

The allocation of the Greggs site for industrial use and the restrictive nature of Policy LP42 does not provide the flexibility or positive approach to plan-making that is required by the NPPF and London Plan.

Greggs have previously submitted evidence which demonstrates that the site is no longer appropriate for industrial uses. A site plan showing a policy-compliant industrial redevelopment is included at Appendix 1. This accommodates all vehicles on site, as would be required by the emerging Controlled Parking Zone. It shows that less floorspace and fewer jobs would be achievable. To this extent it is clear that draft Policy LP42 could not be successfully applied as currently proposed in terms of either its text or the proposed allocation.

The unrestricted industrial use of the site is incompatible with the surrounding area and it is unlikely that a developer could viably re-provide improved accommodation in the context of those policies set out within the adopted and emerging plan. Evidence relating to the viability of industrial redevelopment is included at Appendix 2.

This is not to suggest that some employment uses could not be accommodated, but that alternative employment uses would be more appropriate and could better contribute to the Borough's needs.

In this respect the allocation of the site for a mixed-use residential-led development, in-line with the draft policy set out in earlier drafts of the Site Allocations Plan (2013) is considered a more appropriate use of the site.

### How can the Plan be made sound?

The following could be undertaken:

1. Reallocate the Greggs site for a residential-led mixed use scheme; if, without prejudice, this is not achieved, then we would suggest the following:
2. Remove the “West Twickenham Cluster” from the list of areas identified as “locally important industrial land and business parks”

Separately, amendments should be made to Policy LP42. These include the following:

- The requirement for two years of marketing evidence to be provided in order to justify the loss of industrial land should be amended to one year. The requirement for marketing evidence should be removed entirely where it can be demonstrated that the site cannot viably be bought forward for the identified use.
- The quality and fitness for purpose of sites and accessibility to the strategic road network should be included as criteria to be taken into account when assessing if sites are suitable for continued industrial use. This is in keeping with the criteria set out in the London Plan.
- The restrictive approach to the loss of industrial floorspace should be revised to include consideration of employment capacity. Wording should be amended to resist either floorspace or jobs. This approach should also be followed at Policy LP40.

Full justification for the proposed amendments is set out in the following sections.

## 3 NPPF TESTS

### 3.1 POSITIVELY PREPARED

The NPPF requires Local Plans to be positively prepared. The draft plan, however, contains an obvious disconnect between the strategic priorities and the detailed policies set out in the Publication Local Plan.

The Publication Local Plan outlines the key issues facing the borough and sets out the strategic vision and objectives for the plan period. These are wide ranging and include a number that are relevant to the Greggs site.

It is particularly notable that the strategic vision of the Local Plan seeks to safeguard the residential quality of life and confirms that the amenity of residents and local neighbourhoods will be protected and action taken on environmental issues and pollution. At present, however, the industrial use of the Greggs site has a significant adverse effect on the amenity of local residents, which is likely to continue if the allocation of the site for industrial use is taken forward. The existing units benefit from an unrestricted permission which enables 24 hour working, with associated servicing. Amenity is impacted by noise, smells and traffic. Further detail regarding this has been set out in representations submitted to previous consultation exercises. See particularly appendices 3, 4 and 5.

The Publication Local Plan also sets out strategic objectives, which cover a number of issues, including employment. In particular, the Council seek to protect and encourage land for employment use, *“particularly small and medium-sized enterprises and creative industries to grow the employment base of the borough”* (page 17). The borough previously identified in the Site Allocations Plan DPD that the site was suitable for start-up and small scale business uses. This approach therefore sought to promote the strategic objectives for the borough through the proposed allocation. However, Policy LP42 designates the Greggs site as “locally important industrial land” and seeks to resist the loss of industrial floorspace unless full, on-site replacement floorspace is provided.

The general protection of the site for industrial use does nothing to encourage SMEs or start-up businesses and does not therefore support the borough’s current or future employment needs. Nor is the same amount of floorspace achievable under current policy through a new application. This was made clear previously in Greggs representations to the Pre-Publication Local Plan consultation.

Specialist advice provided by Steve Mitchell (Director, Colliers Industrial and Logistics Agency) was submitted to the Pre-Publication Local Plan consultation and this is included at Appendix 2. This confirms that, due to a number of site-specific constraints the site would be unattractive to the vast majority of industrial investors. This view has been informed by feasibility work undertaken in conjunction with ACG architects, which explored industrial redevelopment options for the site. This exercise demonstrated that, due to the site's constraints, an industrial redevelopment scheme would provide less floorspace and would be likely to result in a reduction in the number of jobs.

Greggs have also made available an indicative scheme for the residential-led redevelopment of the site. This is included at Appendix 6. It shows, conversely, that a residential-led redevelopment scheme incorporating B1 uses would enable a similar number of jobs to be maintained on the site to those which are associated with the existing bakery by increasing the employment density of the space provided.

It is not clear to Colliers International or Landmark Chambers that this information has been considered by the Council in drafting the Publication Local Plan. There is a lack of transparency in this regard.

Greggs is of the opinion that it is evident the protection of the site for industrial use is inconsistent with the thrust of the overall vision and objectives of the Publication Local Plan, both in terms of the adverse impact on residential amenity and the missed opportunity to provide a location for small/medium businesses and start-ups.

Greggs is of the opinion that, in order to ensure the plan is positively prepared, it is necessary for Policy LP42 to reflect the criteria set out at London Plan Policy 4.4. This is discussed further at section four. However, in summary, the quality and fitness for purpose of sites should also be used as criteria against which proposals for the redevelopment of industrial sites is assessed.

We are also of the opinion that the requirement for sites to be marketed for two years in order for industrial space to be released for other uses is too prescriptive and unjustifiable. This approach will hold up the release of appropriate sites. It does not therefore accord with paragraph 22 of the NPPF which seeks to avoid the long-term protection of industrial sites where there is no reasonable prospect of the site being used for this purpose. We therefore consider that Policy LP42 and the associated Appendix 5 are amended to require sites to be marketed for a period of one year.

## 3.2 JUSTIFIED

In order to be justified, the NPPF requires Local Plans to set out the most appropriate strategy when considered against the reasonable alternatives. The London Plan states at Policy 4.4 that where appropriate due to the environmental and transport restrictions of a site, existing industrial sites should be released and new industrial allocations should be located in areas that do not have sensitive neighbours (such as residential uses) and are close to a main road.

Addressing employment needs requires a spatial and Borough-wide approach rather than reactive safeguarding of existing stock. There are other sites within the Borough which would be better suited to allocation for industrial uses than the property at Gould Road. Other large sites currently proposed as redevelopment allocations in the Publication Local Plan include those such as SA21 Sainsbury's, Lower Richmond Road, Richmond and SA28 Barnes Hospital, East Sheen. These better meet the objectives of the London Plan. They should also be considered for industrial uses and allocated accordingly instead of Greggs' property.

The Employment Land Review (ELR) undertaken by Peter Brett Associates in December 2016 and the "Assessment of Light Industrial and Storage Stock in Richmond upon Thames 2016", produced by the Council, form the evidence base for the employment policies set out in the Publication Local Plan. The Council's Assessment appraises specific clusters and sites, and includes a review of the West Twickenham Cluster, which includes the Greggs site. This identifies a number of issues which demonstrate the site is unsuitable for continued industrial use.

The ELR assessment of the site confirms that access is *"poor for Bakery lorries as they are in conflict with other road users until they access the main road"*. In assessing the quality of environment, the ELR notes that the *"site is enclosed by residential streets with no room for expansion. The roads are too narrow once cars are parked on both sides for lorries to turn in one go"*. The Assessment also notes that the entrance to the bakery is unsuitable. The ELR also notes the condition of the building as being 'fair'. This implies that they are not worthy of protection *"generally, those properties defined as "good" or "high" quality were considered as worthy of protection as were modern buildings and good quality period properties."*

Despite identifying a number of problems with the site, the ELR concludes that the site should be protected for industrial use as it is a long standing employment area. This is a fundamental flaw in the approach to allocating land for development. To protect all existing industrial locations in this way is



simplistic. It does not reflect an informed approach to plan-making and is inherently unsustainable.

An additional concern in this respect is the clear lack of consistency in the approach to site allocation undertaken by the Council. There are, for example, sites which have very similar topographical characteristics to those at Gould Road but which are proposed for release.

This is particularly evident when a comparison is made between the Greggs site and “SA27 Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen”. In very simple terms, Site SA27 also includes existing employment uses and is surrounded by terraced housing to the east and west. These sites are shown on the Publication Local Plan extracts below and overleaf.



**SA 27 Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen**



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

Despite the clear comparison which can be made between the two sites, the draft SA27 allocation allows for a much greater level of flexibility in terms of its future uses. It indicates that a mixed use scheme with housing could be considered. No evidence is provided by the Council to demonstrate why the Telephone Exchange site has been approached in an inconsistent manner to that at Gould Road. There is therefore a lack of transparency and inconsistency of approach. This is not justified.

Greggs is of the view that the rationale used by the Council to protect the Greggs site for industrial use (it is a "long standing employment area") could equally be applied to the Telephone Exchange site, or vice versa.

The Publication Local Plan also identifies a number of other commercial sites that have been declared surplus to operational requirements and are being proposed for mixed use allocation to incorporate an element of residential use. These sites include a number of other telephone exchanges and Royal Mail delivery offices in Hampton, Teddington and Whitton (Site Allocation references SA4, SA5, SA6 and SA13). All of these sites are located in heavily residential areas surrounded by high density terraced housing. They would appear to suffer from similar access and amenity constraints as the Greggs site. Yet here again the Council is taking a different approach, further demonstrating a lack of consistency in terms of plan-making.

Greggs are eager to stress that this is despite these issues being identified in the NLP Employment Land Assessment provided previously in the representations (at Appendix 3) which were submitted to the Pre-Publication Local Plan consultation.

On the basis of the information set out above, we consider that the approach to site allocation employed by the Council is inconsistent and unclear. The Council has failed to provide a robust evidence base and transparent rationale for allocating sites in the Publication Local Plan and we do not consider that all reasonable alternatives have been reviewed. The plan does not therefore provide an appropriate strategy and should therefore be considered unsound.

### 3.3 EFFECTIVE

In order to ensure that the strategic objectives are delivered in the plan period, there is a need for the development management and site allocation policies to take a pragmatic approach to the redevelopment of existing sites. If this is not done, then the prospects of development coming forward on allocated sites are greatly reduced, resulting in the plan being ineffective.

The proposed safeguarding of existing industrial and office accommodation solely for employment uses, and the viability issues associated with this approach, means that it is unlikely that any new purpose built accommodation will come forward on the Greggs site over the plan period. It is therefore unlikely that the Publication Local Plan strategic objectives will be realised.

In the event that the Greggs site were allocated for a mixed-use development, the introduction of residential use on the site would allow for cross-subsidised affordable workspace for start-up and local businesses which would be unviable to bring forward on their own. This approach could enable a similar level of employment to that which an industrial unit could accommodate, in a manner more in keeping with the surrounding area and better suited to meeting local needs. It would therefore be a better reflection of the strategic vision and objectives of the Publication Local Plan and be more likely to deliver the type of employment uses that the Council identify as required to meet people's needs.

### 3.4 CONSISTENT WITH NATIONAL POLICY

In order to be considered sound, the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. We do not consider that the Publication Local Plan is in accordance with the policies set out at paragraphs 22, 158 and 161 of the NPPF. Further detail in this respect is provided below and overleaf.

### **NPPF – Paragraph 22**

The NPPF makes clear that “planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for this purpose” (paragraph 22). As set out in the previous sections and representations to earlier Local Plan consultation exercises, it has been demonstrated that the site is unsuitable for continued industrial use. In particular, and as set out previously, specialist advice was provided by Steve Mitchell (Director, Colliers Industrial and Logistics Agency) at Appendix 6 of the submission to the Pre-Publication Local Plan consultation. This is re-provided at Appendix 2 of these representations. This confirmed that, due to a number of site-specific constraints, the site would be unattractive to industrial occupiers. It is evident that, in allocating the Greggs site for industrial use, the Council have not taken this evidence, or paragraph 22 of the NPPF, into account. Issues which relate to highways and noise have also been made clear, with evidence of this at in the Pre-Publication representations at Appendix 3.

The Council has itself confirmed through the Publication Local Plan strategic vision and objectives, that the priority for employment in the borough is the provision of small / medium sized units, start-up and incubator units and flexible employment floorspace. The long-term protection of the Greggs site for industrial use would not achieve these objectives despite evidence provided by Greggs making clear that this would in fact be the most appropriate form of employment use to accommodate on the site in the future.

### **NPPF – Paragraph 47**

The NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. The housing land supply for the Borough is dependent on a small number of large key sites being developed. This introduces a significant amount of risk to the validity of the Borough’s five year housing land supply.

Greggs is of the opinion that the delivery of housing should be monitored closely to ensure an adequate supply is maintained. If it is not, an appeal could be made at sites with the capacity to provide housing within the Borough under Paragraph 14 of the NPPF. This would threaten the ability of the emerging plan to be successfully applied.

#### **NPPF – Paragraph 158**

Paragraph 158 of the NPPF requires each local planning authority to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

We consider that the “Assessment of Light Industrial and Storage Stock in Richmond upon Thames 2016” and Employment Land Study (2016), which forms part of the Publication Local Plan evidence base, is inadequate as it does not take into account the evidence provided by Greggs through previous representations. Greggs is of the opinion that doing this would have allowed the Council to undertake a more holistic assessment of the site, and would have reinforced that the site is unsuitable for continued industrial use.

#### **NPPF – Paragraph 161**

Publication Local Plan Policy LP42 also fails to meet paragraph 161 of the NPPF which requires local planning authorities to use an evidence base to assess the existing and future supply of land available for economic development and its sufficiency and suitability to meet identified needs.

The “Assessment of Light Industrial and Storage Stock in Richmond upon Thames 2016”, does not consider the site suitable for continued industrial use when assessed against a number of criteria. However, the Council has resolved to allocate the site on the basis that it is a “long-standing employment area”. It appears that this recommendation has been reached not through an assessment of suitability, but through a desire to introduce the long-term protection of the site for industrial use which paragraph 22 of the NPPF seeks to avoid.

## 4 CONSISTENCY WITH THE LONDON PLAN

In addition to the four tests of soundness set out in the NPPF and considered in previous sections, it is also necessary for the London boroughs to ensure that Local Plans are in accordance with the London Plan. Indeed, for many London Plan policies, clear guidance is provided on the issues that local authorities should take into account when preparing Local Plans.

As set out previously, the Publication Local Plan strategy seeks to protect and maintain its employment base, and enhance it through new provision to accommodate the expected job growth. The spatial strategy prescribes that the London Plan requires a 'restrictive' approach towards the transfer of industrial land to other uses and this should be adopted in the Borough. It outlines that this means that a cautious approach should be taken to releasing industrial land for other uses.

Greggs is of the opinion that the Borough has fundamentally misunderstood the requirements of the London Plan in this regard. The London Plan requirement is for locally significant industrial sites to be designated on the basis of robust evidence demonstrating their particular importance for local industrial type functions to justify strategic recognition and protection, which is clearly not the case in this instance.

The London Plan, at Policy 4.4 "Managing Industrial Land and Premises", sets out a variety of criteria to be taken account of when preparing Local Plans. In particular, the policy requires local planning authorities to take account of a range of factors when demonstrating how the stock of industrial sites in the borough will be planned and managed. This includes elements such as the quality and fitness for purpose of sites (criteria e) and accessibility to the strategic road network (criteria f). This has not been reflected in the draft policy.

Moreover, there is a lack of transparency in terms of how these criteria have been applied to the proposed site allocations. As set out in section three, the Publication Local Plan identifies a number of other commercial sites that have been declared surplus to operational requirements and are being proposed for mixed use allocations to incorporate an element of residential use. However, they would appear to suffer from similar access and amenity constraints as the Greggs site. The Transport Assessment and Noise Assessment submitted to the Pre-Publication Local Plan consultation provide detailed analyses of these amenity constraints, but have not been considered by the Council. This information is contained at Appendix 3.

Further to this, the supporting text of London Plan Policy 4.4 provides guidance on the designation of industrial sites. In particular, boroughs are required to make explicit in DPDs the types of uses considered appropriate in locally significant industrial sites and distinguish these from more local industrial areas (para 4.10). The Publication Local Plan does not designate any strategic industrial sites or locally significant industrial sites, so it is assumed that the “locally important industrial land” identified by the Council is protected to a lesser degree. The correct approach should be adopted and this matter clarified.

## 5 CONCLUSION

Greggs is of the view that the Publication Local Plan does not meet the soundness criteria set out by the NPPF. In this respect, the Publication Local Plan is not positively prepared, justified, effective or consistent with national policy. It should not therefore be adopted without amendments to address this.

Greggs has previously made clear that the site at Gould Road is no longer appropriate for industrial uses. They have also demonstrated that an industrial redevelopment which accorded with policy is not deliverable. Conversely, Greggs have provided evidence which makes clear that the same number of jobs as currently exist could be achieved in a form of employment provision which better meets the Borough's vision and needs as part of a residential-led mixed-use scheme.

The allocation of the Greggs site for industrial use is in complete contradiction to the evidence which has been provided. The wording of draft Policy LP42 is also inconsistent with the London Plan and does not provide the flexibility or positive approach required by the NPPF. The draft should not therefore be adopted without amendments to address this.

**For the avoidance of doubt, Greggs strongly objects to the current policy approach and proposed allocation.**



# APPENDICES

# 1 INDICATIVE SCHEME: INDUSTRIAL REDEVELOPMENT





**NOTES:**  
**DO NOT SCALE. USE FIGURED DIMENSIONS ONLY.**  
All dimensions to be checked on site.  
All drawings to be read in conjunction with engineer's drawings. Any discrepancies between consultants drawings to be reported to the Architect before any work commences.  
The Contractor's attention is drawn to the Health & Safety matters identified in the Health & Safety plan as being potentially hazardous.  
These items should not be considered as a full and final list.  
The Work Package Contractor's normal Health & Safety obligations still apply when undertaking constructional operations both on and off site.  
Ayre Chamberlain Gaunt take no responsibility for the location of legal boundaries indicated on this drawing and advise a separate drawing be completed by a specialist surveyor in order to establish exact boundaries.  
DWG files provided for information only. Refer to PDF record.  
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TOTAL SQ OF COMMERCIAL SPACE **65,655 SQ**  
TOTAL NO. PARKING SPACE **132 spaces**

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AYRE  
CHAMBERLAIN  
GAUNT

PROJECT

Greggs Site  
Twickenham

DRAWING TITLE

Site Plan  
Commercial Units Layout

REV DATE NOTES

REV	DATE	NOTES

DRAWN BY

GW

CHECKED BY

OW

JOB NO.

216

STATUS

FOR COMMENT

DRAWING NO.

216\_SKE\_160818\_00

REV

-



## 2 LETTER FROM INDUSTRIAL AND LOGISTICS AGENTS

19<sup>th</sup> August 2016

Ashley Ritchie  
Fernwood House,  
Clayton Road,  
Jesmond,  
Newcastle upon Tyne  
NE2 1TL.

Dear Ashley,

**GREGGS BAKERY, GOULD ROAD, TWICKENHAM TW2 6RT**

I write further to your request to update my letter of 7<sup>th</sup> March 2016 in light of the recent report prepared by NLP. I can therefore confirm that we have reviewed the Employment Assessment Report undertaken by NLP in relation to your redundant and surplus site at Gould Road. Having done so, we consider the market commentary contained within the report to be correct. There is certainly good demand for industrial stock within the Borough of Richmond, by virtue of it being in limited supply. As such, there is a good case to support further industrial development in the wider Twickenham area.

However, I must stress that this does not change the nature of our previous advice. The problem is that the strong local market does not, in itself, improve the saleability of the site to an industrial investor or developer. This is because of the same site-specific constraints which we have raised as a concern with you previously. The rental values we see when reviewing the latest comparable evidence and considering these against the site constraints (shape, neighbouring uses and lack of frontage) make it unattractive to the majority of the market.

The local road network makes it difficult for HGV's to access the site without traffic conflicts occurring. Proximity to nearby residential properties are also likely to attract complaints from members of the public relating to noise, light and smells. Not only would these issues affect a potential occupier, as they have done Greggs historically, but they would also comprise significant barriers for a developer if the site was brought to market as an industrial redevelopment opportunity. In general terms the market demand in LB Richmond suggests this would be achievable, but the individual site characteristics does not provide this opportunity.



In order to ensure that our advice to you is robust, we have also revisited the feasibility work which we undertook in conjunction with your architect, ACG, to explore industrial redevelopment options for the site earlier this year. Our view remains that the Local Planning Authority would be likely to significantly restrict the amount of industrial development that could be achieved as part of a new-build scheme in order to avoid the historic and current conflicts which arise by virtue of its location and changes in parking policy (such as the proposed CPZ). It is also likely that there will be restrictions on hours of use, anything less than a 24-hour operation allowance will deter developers from the outset as this is becoming a minimum requirement and would have an impact on any potential pre-let activity. As before, we consider this would result in a smaller scheme with more restrictions over its use.

You should be aware that we have given this matter serious consideration. We are exceptionally active in the industrial market and have a market-leading position amongst other agents. We have had informal conversations with our developer clients and have used these to prepare various development appraisals analysing the site's redevelopment potential as an industrial location. Unfortunately, unlike other sites which we understand the LB Richmond is seeking to allocate as part of its current review, the amount of industrial floor space that could be accommodated on the site when considering a small industrial scheme means it is far less feasible here than elsewhere.

This is not to say that an industrial scheme at the site could not be profitable through various appraisals which may or may not be accepted by the LB Richmond's planners. However, the amount of developer profit (c.£1.1m) we believe is too small to attract the vast majority of industrial investors active in the market due to the considerable site constraints and hurdles which would be required to overcome and also considering that our appraisals are highly assumptive.

We should also note that in order to calculate this level of profit, we have made a series of assumptions which include a contingency fee (5%) and no cost whatsoever for land remediation. This is a significant risk as the historic industrial use of the property (not least that it currently contains a large amount of asbestos) could mean that the decontamination costs are high. It is our view that any prospective purchaser in the current market conditions would be those that assume they could secure a residential permission in order to mitigate these risks which have the potential to completely erode any profit.

I trust this provides a satisfactory clarification of the site's prospects as an industrial location in the current market and would be pleased to discuss any element with you further as required.

Yours sincerely,



**Steven Mitchell**  
**DIRECTOR | INDUSTRIAL AND LOGISTICS**



### 3 REPRESENTATIONS IN RESPONSE TO PRE- PUBLICATION LOCAL PLAN

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# LB Richmond Local Plan: Pre-Publication Consultation

REPRESENTATIONS SUBMITTED ON BEHALF OF GREGGS PLC  
GREGGS BAKERY, GOULD ROAD, TWICKENHAM TW2 6RT

AUGUST 2016

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COLLIERS INTERNATIONAL

GREGGS PLC

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# 1 INTRODUCTION AND BACKGROUND

Colliers International, on behalf of our client Greggs PLC, are instructed to comment on the Pre-Publication Local Plan consultation document.

This report follows comments made to the previous emerging development plan consultation exercises, reiterating and expanding upon the points made. The previous representations were made after the consultation deadline as notification of the consultation exercise was not received, this is despite representations on all other relevant consultation exercises having been made to the Borough and contact details provided.

Greggs PLC (hereafter 'Greggs') own the freehold to land at Gould Road, Twickenham. We wish to comment specifically in relation to the proposed employment allocation for the 'West Twickenham cluster (including Greggs Bakery and surroundings), Twickenham'. In particular, whilst some employment uses might be achievable, Greggs strongly objects to the Borough's proposal to allocate their site for 'Locally important industrial land'. It considered the proposed designation to be unsound as it is not justified, effective or consistent with national policy.

Greggs has operated a bakery from the site since the business took control of it as part of a larger property acquisition in 1994. Throughout this period it has proven problematic from an operational and asset management perspective, resulting in the business beginning a search for alternative premises in the late 1990s as the site was considered unfit for purpose, but has been continuous and on-going. The business imperative to date has therefore been to operate the unit, albeit unsatisfactorily and inefficiently, trying to maintain sometime fractious relationships with neighbours for as long as possible until a replacement can be found. The building contains asbestos and has reached the end of its useful life.

The operational nature of the business has also changed over time. In addition to the premises being unfit for purpose, the company has recently made a strategic decision to move from operating smaller decentralised bakeries and will centralise production in larger, more suitable premises, over the next few years. As a result a decision was made by Greggs early in 2016 to consult with its employees on the closure of the Twickenham bakery and the relocation of production and distribution to Enfield by the end of this year.

Greggs are nonetheless committed to securing the best long-term use for the site and are therefore eager to engage with the Borough as to its future.



## 2 SITE CONTEXT

The site is located on Gould Road in Twickenham and comprises an inverse 'L' shape that extends to 1.1 ha. The extent of Greggs landholdings is shown in the site location plan included at Appendix One. The site is located to the north-east of the centre of Twickenham, in a predominantly residential area. The surrounding streets are characterised by two storey Victorian terraced housing. The site currently comprises industrial buildings which house production facilities for Greggs and which fall within a B2 Use Class. To the north, the site is bounded by the river Crane and the railway line. Access to the site is through two vehicular accesses; one on Edwin Road and the other on Gould Road. The site is not currently allocated for any particular uses.

Greggs have owned the site since 1994, when they took ownership of the property as part of a much larger property portfolio purchase. They would not have acquired the site as a standalone proposition and since incorporating it into their business the property has been blighted by the substandard quality of existing accommodation; including, for example, the discovery of asbestos upon occupation. The result has been that the business has been incurring an on-going and unsustainable cost of maintenance. In addition to problems with the building fabric, the physical constraints of the site (not least relating to transport and noise), have been continually problematic. The physical and financial constraints of the site were such that Greggs began the search for alternative premises in the late 1990s, including a discussion with the London Borough of Richmond in 2001. The purpose of this engagement with the Borough was to seek support for the identification of an alternative five acre site.

Greggs failed to identify a suitable replacement site but the firm has maintained a watching brief for alternative premises, the site's problems have persisted, with Greggs needing to address significant management issues. As the enclosed Guardian article shows (Appendix Two), this includes various well-reported negative impacts on the amenity of nearby residents. Typical conflicts with residents relate to damage done to parked vehicles, highways blockages (from both deliveries and staff parking) and the emission of noise, light and odour. The firm has also received complaints about the littering of surrounding streets, such as cigarette butts and coffee cups, by factory staff.

Greggs has made an exceptional amount of effort to address these concerns, in partnership with the local community, committing considerable financial resource to the site's management in the process. Yet, in addition to the property's physical shortcomings, unavoidable conflicts still occur with local residents. Greggs is therefore of the opinion that the long-term industrial operation of the site is

unacceptable from both a business and community perspective. The future approach should not therefore include any industrial uses.

## 3 PREVIOUS CONSULTATIONS

Colliers International and an associated team of consultants have been working on behalf of Greggs Plc to secure a future use for the site following the planned closure of the site at the end of 2016. Representations to relevant emerging development plan consultation exercises are set out below:

### 3.1 SITE ALLOCATIONS PLAN DPD

The Borough previously identified the land as part of a wider potential allocation when, in late 2013, it sought comments on a draft Site Allocations Plan. This document sought to allocate the Greggs site and adjoining land as the 'West Twickenham cluster, Twickenham' as outlined below and overleaf.

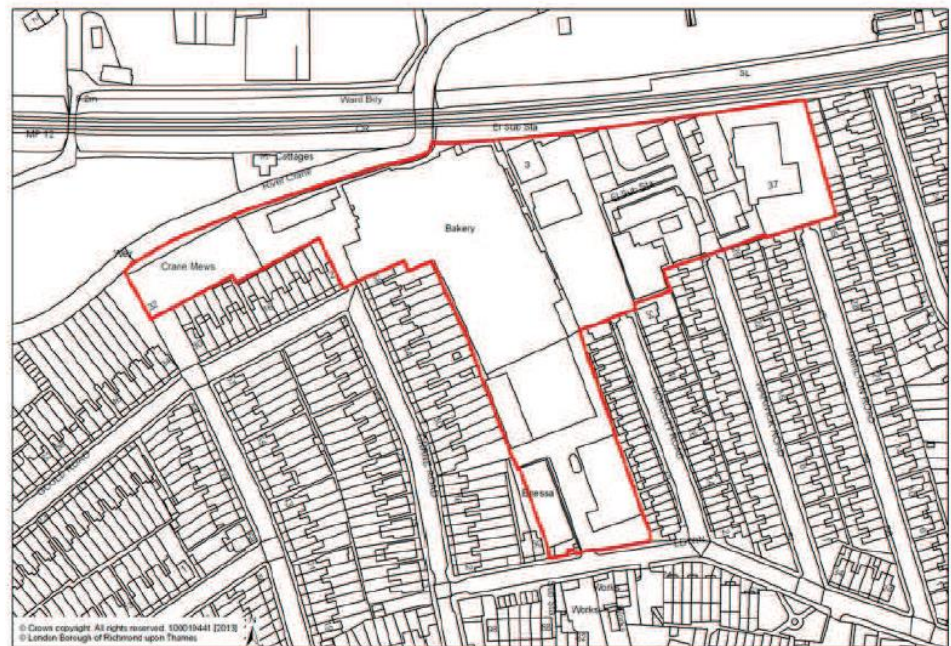
#### ***TW 11 West Twickenham cluster, Twickenham***

##### ***Proposal***

*Mixed residential, start up and small scale hybrid business space and / or primary school. Proposed Designation as key employment site*

##### ***Justification***

*Mixed uses, retaining levels of employment for start up / creative workshops and small scale business uses. Possibly primary school on part of site. Residential to include appropriate amounts of affordable housing. Access arrangements to be carefully designed to be commensurate with the road network.*



**Proposal Site TW 11 West Twickenham cluster, Twickenham**

Colliers International submitted representations on behalf of Greggs in November 2013. These supported the allocation of the site and wider area for a residential-led mixed-use development. However, they also highlighted that the reference in the policy text to a 'Proposed Designation as key employment site' was misguided. Greggs were aware at this stage that the site was not suitable for continued employment purposes due to the sites constraints and this was made clear. This remains the case and influenced the decision to cease manufacturing at the property.

### 3.2 LOCAL PLAN REVIEW (2016)

In 2015, LB Richmond decided against progressing the Site Allocations Plan DPD and revised the Local Development Scheme to include a review of the adopted development plan policies and the Draft Site Allocations Plan DPD in order to form a new consolidated Local Plan. An informal Scoping Consultation was undertaken in January 2016 and identified a number of sites that were considered necessary to deliver the Borough's spatial strategy. The Greggs site remained included as part of the 'West Twickenham cluster'. However, the allocation was identified as a site suitable for 'important industrial estates, business parks, creative industries and other key employment facilities'. The site boundary was also amended, now including land to the south and excluding land to the east. The accompanying text makes no reference to any mix of uses. This is despite Greggs controlling the

majority of the land and making clear previously that there was little long-term opportunity for industrial uses.

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



## 4 RESPONSE TO PRE-PUBLICATION LOCAL PLAN CONSULTATION DOCUMENT

The Pre-Publication Local Plan (hereafter 'Draft Local Plan') was issued for consultation in July 2016. Greggs welcomes the opportunity to comment on this document and wishes to specifically comment on the following sections of the Draft Local Plan consultation document:

### 4.1 CHAPTER 2 - STRATEGIC CONTEXT, VISION AND OBJECTIVES

This section sets out the strategic planning framework for the borough for the next 15 years. Greggs supports the Local Plan Strategic Vision for the Borough, in particular, that it recognises the need to ensure residential quality of life through the improved environmental amenity of its residents and create a successful local economy through the creation of new floorspace to support new business start-ups and a variety of small local businesses, focusing on offering local jobs, and further opportunities for residents to set up their own enterprise.

In order to ensure that the strategic objectives are delivered in the plan period, there is a need for the development management and site allocation policies to take a pragmatic approach to the redevelopment of existing sites. The Greggs site provides a vital opportunity to enhance the environment, improve the amenity of the neighbouring residential properties and provide much needed purpose built accommodation for start-up and small local businesses. The proposed safeguarding of existing industrial and office accommodation for employment only uses and the viability issues relating to this approach means that it is unlikely that any new purpose built accommodation will come forward on these sites over the plan period for affordable workspace. The introduction of a residential use on the site would allow for cross subsidised affordable workspace for start-up and local businesses which would be unviable to bring forward on its own.



## 4.2 CHAPTER 3 - SPATIAL STRATEGY

This section sets out the Boroughs strategy for delivering its vision and objectives over the plan period. The Draft Local Plan's strategy seeks to protect and maintain its employment base, and enhance it through new provision to accommodate the expected job growth. The spatial strategy prescribes that the London Plan requires a 'restrictive' approach towards the transfer of industrial land to other uses and this should be adopted in the Borough. It outlines that this means that a cautious approach should be taken to releasing industrial land for other uses.

Greggs objects to this approach and wishes to highlight that the requirements of the London Plan have been fundamentally misunderstood. Rather, the London Plan requirement is for locally significant industrial sites to be designated on the basis of robust evidence demonstrating their particular importance for local industrial type functions to justify strategic recognition and protection.

The London Plan states that where appropriate due to the environmental and transport restrictions of a site, existing industrial sites should be released and new industrial allocations should be located in areas that do not have sensitive neighbours (such as residential uses) and are close to a main road. This would encourage and enable occupiers to operate from the site without the current restrictions experienced by our client which has been seen to significantly impact on their business. Addressing employment need requires a spatial and Borough-wide approach rather than reactive safeguarding of existing stock. Other larger sites, currently proposed as redevelopment allocations in the Draft Local Plan (such as 'SA 20 Sainsbury's, Lower Richmond Road, Richmond') should therefore be considered as suitable locations for industrial and retail uses. There are more suitable locations with more scope to accommodate industrial uses. To simply protect existing industrial locations is simplistic and does not reflect the most sustainable approach.

## 4.3 CHAPTER 9 - HOUSING

This section sets out the overarching approach, need and development management policies to enable housing delivery across the Borough over the plan period.

Greggs supports the recognition that the Borough must deliver its housing target, as derived by the evidence and adopted in the London Plan. The London Plan emphasises a pressing need to deliver housing in the Greater London area and the

Borough's target has been revised since the adoption of the Core Strategy and now requires the delivery of 3,150 homes for the period 2015-2025 (315 units per annum).

The approach taken to direct the largest housing growth to the larger settlements of Twickenham and Richmond is supported. However, in order to ensure that 1000-1050 units are delivered in each settlement there is a need to allocate suitable sites for residential development. Given the constraints of the Borough and the reliance on completions through Permitted Development Rights to convert office floorspace to residential units in order to meet annual targets (210 units as defined by the latest AMR 2014/2015), the need to allocate previously developed industrial sites for housing is essential. This is particularly the case since the Borough introduced a blanket restriction on Permitted Development rights as this accounted for 68% of completions. New allocations should be by way of an evidence based approach, which reviews and recommends lower quality sites to be released for residential or mixed use.

#### 4.4 CHAPTER 10 - EMPLOYMENT AND LOCAL ECONOMY

This section sets out the proposed development management policies derived to facilitate, enable and deliver the spatial objectives for jobs and the economy over the plan period.

The justification text for employment policies contained in this section reflects that set out in the spatial strategy and states that the Borough has a very limited supply of industrial floorspace and demand for this type of land is high. Therefore, it says, the Borough will protect, and where possible enhance, the existing stock of industrial premises to meet local needs.

The Draft Local Plan proposes to replace Existing Policy DM EM 2 (Retention of employment) with a number of new employment related policies relating to specific B uses. The Greggs site is identified as forming a large part of the proposed 'West Twickenham Cluster'. The proposed allocation is for it to be defined as 'locally important industrial land', governed by proposed New Policy LP 42 (Industrial land and business parks).

Greggs objects to the allocation of its land for industrial use and the restrictive nature of the wording contained in New Policy LP 42. The reasons are set out in this report and accompanying supporting documents and Greggs does not believe that this approach is justified, effective or consistent with national policy.

#### 4.4.1 EVIDENCE BASE DOCUMENTS

An Employment Land Assessment undertaken by NLP accompanies this representation (Appendix Three) and analyses the Borough's evidence base documents relating to employment land and provides a market overview. This report demonstrates that there are clear gaps in the evidence base documents.

Paragraph 10.1 of the Draft Local Plan consultation document states that the policies focusing on the protection of the employment land are considered to be in general conformity with the NPPF and London Plan. Greggs do not agree with this statement. The NPPF makes clear that *"planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for this purpose"* (paragraph 22). The London Plan sets out nine matters for local planning authorities to take into account when preparing local development plans in order to demonstrate how the Boroughs will plan and manage industrial land. The lack of transparency associated with the current approach, and lack of evidence base and logic chain, fails to meet the London Plan requirement for locally significant industrial sites to be designated on the basis of robust evidence demonstrating their particular importance for local industrial type functions to justify strategic recognition and protection.

The 2013 Richmond Employment Sites and Premises Study (ESP) is seen as a key evidence base document and identifies that many of the existing larger industrial sites suffer from accessibility constraints and for this reason are unlikely to meet industrial occupier's future needs. The ESP recommends that a mixed use development with an employment element should be supported on these sites.

The subsequent employment evidence base studies have sought to update this key evidence in a piecemeal and fragmented way and as such the Borough has failed to provide a robust and transparent logic chain to justify the current approach. This lack of evidence base and logic chain fails to meet the London Plan requirements for locally significant industrial sites to be designated on the basis of robust evidence demonstrating their particular importance for local industrial type functions to justify strategic recognition and protection.

Indeed, the site is unsuitable for continued industrial use and this conclusion is supported by the Borough's own assessment of industrial sites prepared earlier in 2016, which describes the site as being of 'fair' quality and therefore one of the poorest scoring sites in the Borough. Our client therefore objects to the inclusion of their site as an allocation for 'Locally important industrial land' as this approach has not been justified by evidence base documents.

It is Greggs view that in order to meet the proposed Strategic vision and objectives for jobs and the economy over the plan period, the Borough should be selective in determining which sites to protect for industrial use. This assessment should be in line with the scoring process previously adopted to review sites in the ESP. This would allow for poorer scoring sites to be allocated for mixed use development, including providing employment floorspace for start-up and creative business uses. In light of the evidence base, a mixed use approach represents a pragmatic and sensible future use for the site, given the site's existing constraints and amenity issues. This would also allow for the provision of a high level of quality flexible, small scale business space (with a focus on B1 a, b and c use) which is expected to drive occupier requirements in the Borough over the plan period.

#### 4.4.2 CONTINUED INDUSTRIAL USES

The site has operated as a bakery for nearly fifty years, before which it was a dairy, and benefits from an unrestricted permission. This allows the use of the site for 24 hour industrial operations without any planning restrictions on access, servicing, noise or emissions. If the site were to be disposed of on the open market, to an industrial occupier, they could therefore manufacture and transport goods without these processes being subject to planning controls. This is likely to have a significant negative impact upon the amenity of nearby residents.

As set out previously, Greggs does not consider the site suitable for employment use. Whilst lawful, the company does not agree with the notion that the property offers the flexibility required for modern industrial operations to take place. This is particularly given the close proximity to residential uses and the resulting negative impact on the transport network and residential amenity; something which the Greggs management team has worked hard to mitigate during occupation and operation of the property, but which has still resulted in conflict.

Greggs have therefore instructed JMP Consultants to prepare a Transport Statement to assess the impact of the current use of the site on the transport network (Appendix Four). The report, which supplements this representation, details that the surrounding roads are not of a sufficient size to accommodate the HGV's and other traffic associated with industrial use. The report also highlights the on-going conflict between the use of the site and the amenity of the surrounding residents.

Greggs also instructed The Equus Partnership to prepare a Noise Assessment to evaluate the impact of the current use of the site as a bakery on the amenity of the neighbouring properties (Appendix Five). The report sets out that the site currently operates on a 24 hour basis every day of the week and the only time the bakery process ceases is between 8pm on Saturday and 6am on Sunday. However, even during these periods other site activities, including the operation of some plant items and arrival/departure of lorries and other vehicles continues. The noise survey and

assessment results clearly demonstrates that noise emissions from the site are currently resulting in a significant adverse impact on the amenity of the neighbouring residential properties.

The redevelopment of the site for use as a bakery or any other industrial use has been considered by Colliers International's Industrial and Logistics team as part of the wider feasibility work undertaken to direct the site's future. The letter accompanying this report at Appendix 6 sets out that the site is not suitable or likely to come forward as an industrial redevelopment scheme. Therefore, the proposed allocation is undeliverable. Furthermore, the protection of the site for this purpose is not in accordance with the objectives of the NPPF or the London Plan. A survey of the surrounding area undertaken by Snapdragon also indicates that the local residents would be supportive of these uses ceasing.

#### 4.4.3 **POTENTIAL MIXED-USE REDEVELOPMENT**

Whilst the site is not appropriate for continued industrial use, Greggs is of the opinion that it could contribute to continued employment generation through a mixed-use residential development. This has the potential to either maintain or increase the number of employees at the site and contribute to meeting housing need in a manner which supports and enhances the character and appearance of the area.

Greggs has been working on draft proposals to identify and understand the site's potential. These have identified that the site is capable of accommodating a significant amount (2,757sq m) of flexible start-up and small scale hybrid business space. At a typical office density, this would allow for approximately 275 employees to be accommodated as part of a redevelopment scheme, which is more employees than currently employed at the site.

The indicative proposals have also sought to respond to the surrounding residential properties in a manner that is complementary and of a similar density. In recreating a traditional London street, with modern flats adjacent to the commercial space, this creates capacity for some 96 residential units. This includes a mix of terraced houses and apartments, family homes and smaller units.

Whilst the site is not currently allocated for any particular uses, Greggs is of the opinion that the Borough's previous approach to the site in the Draft Site Allocations Plan, which sought a residential-led mixed-use allocation, was the correct one. Greggs is able to demonstrate, through its capacity assessments, that this approach would benefit both the employment generating potential of the site and also contribute to meeting housing need. This could be done in a manner which reduces conflicts between the site and surrounding area, improving and enhancing the amenity of local residents.

## 5 CONCLUSION

The Draft Local Plan consultation document suggests that the proposed allocation has previously been explored through consultation on the draft Site Allocations Plan, Local Plan Review and new evidence base documents. However, the proposed allocation of the site for employment use is in conflict with the draft Site Allocations Plan, which supported the mixed-use redevelopment of the site.

Moreover, the Employment Land Assessment produced by NLP to accompany this representation highlights that the evidence base does not justify the change of approach to allocating the site as 'Locally significant industrial land'. The transport analysis prepared by JMP and noise assessment prepared by The Equus Partnership highlights some of the highways and noise issues associated with the continued use of the site for industrial purposes and the detrimental impact that this could / does have on the road network and residential amenity. An acoustic assessment is also being undertaken which can be provided once complete.

Greggs has previously made clear that the site is no longer appropriate for industrial uses and the evidence submitted alongside these representations support this. The allocation of the site for a mixed-use scheme capable of accommodating 96 residential units and 2,757 sqm, in-line with that previously set out in the draft Site Allocations Plan, is therefore considered the most appropriate use of the site.

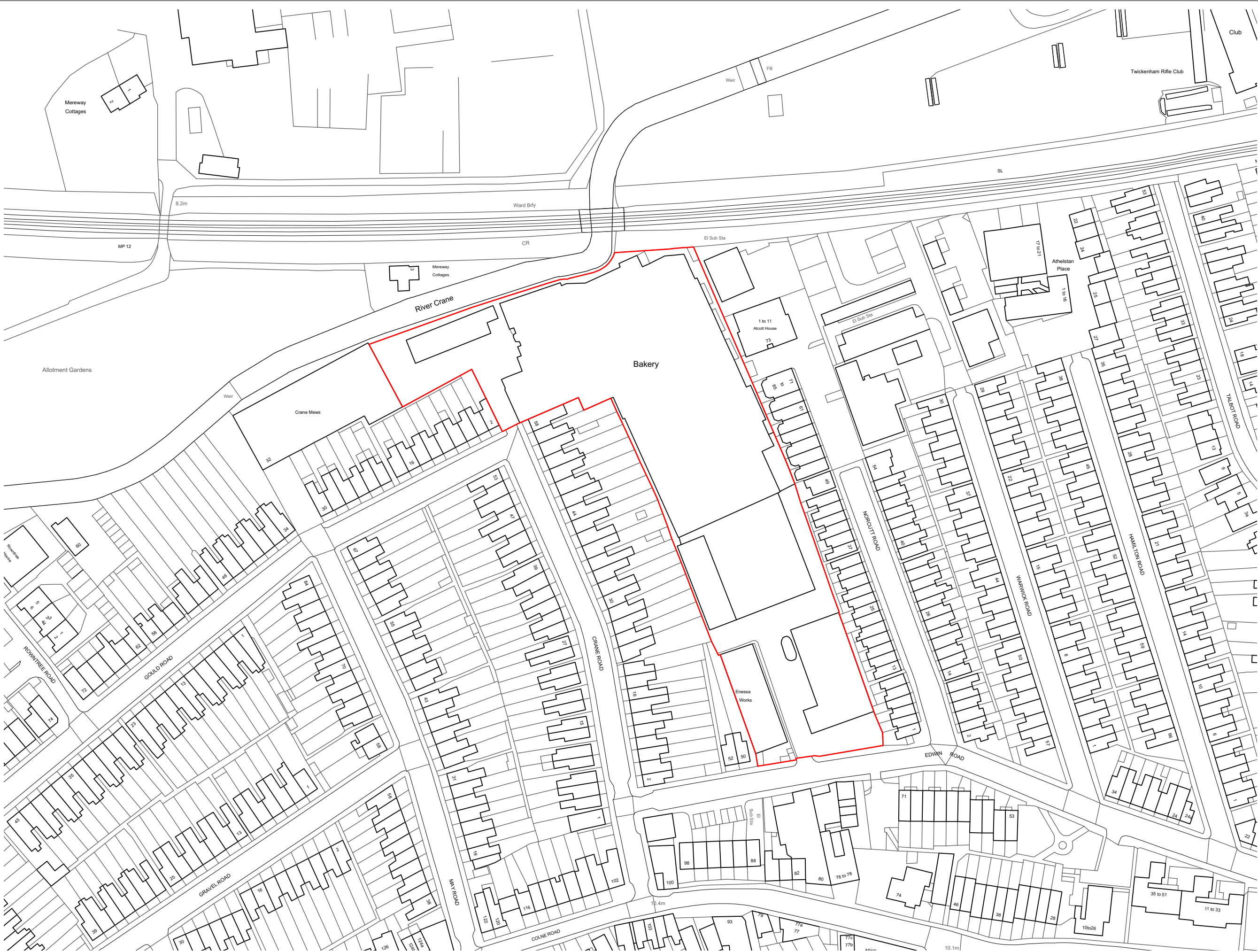
As set out above, Greggs has struggled to operate the site in a satisfactory manner since the site was acquired in 1994. Disposal of the site and relocation to improved premises has been a business consideration for almost two decades. Aside from the current premises being unsatisfactory from a commercial perspective, despite a proactive and committed effort by the Greggs management team, their operation has also negatively impacted upon the amenity of local residents. The site does not meet the requirements of good quality modern manufacturers and Greggs took the decision to consult with its employees on the proposed closure of the site. This consultation exercise was completed to the satisfaction of all parties and the decision was taken to cease operations from the site at the end of this year.

Consequently, Greggs does not support the current approach and objects to the proposed allocation. Their understanding of the site's history, physical and operational constraints, it considers it necessary to object to the proposed allocation for employment-led use of the site and request that the site be included as a mixed-use allocation for employment and residential use (as per the wording of the Draft Site Allocations Plan).



# APPENDICES

# 1 SITE LOCATION PLAN



1 Location Plan  
Scale: 1:1250

NOTES:

Site application boundary

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AYRE  
CHAMBERLAIN  
GAUNT

PROJECT

Gould Road  
Twickenham

DRAWING TITLE

Location Plan

REV	DATE	NOTES
A	25/2/16	Issue for pre-planning application

DRAWN BY	CHECKED BY
AW	GW

JOB NO.	STATUS
216	Planning

DRAWING NO.	REV
216_PLN_001	A

## 2 GUARDIAN NEWS ARTICLE

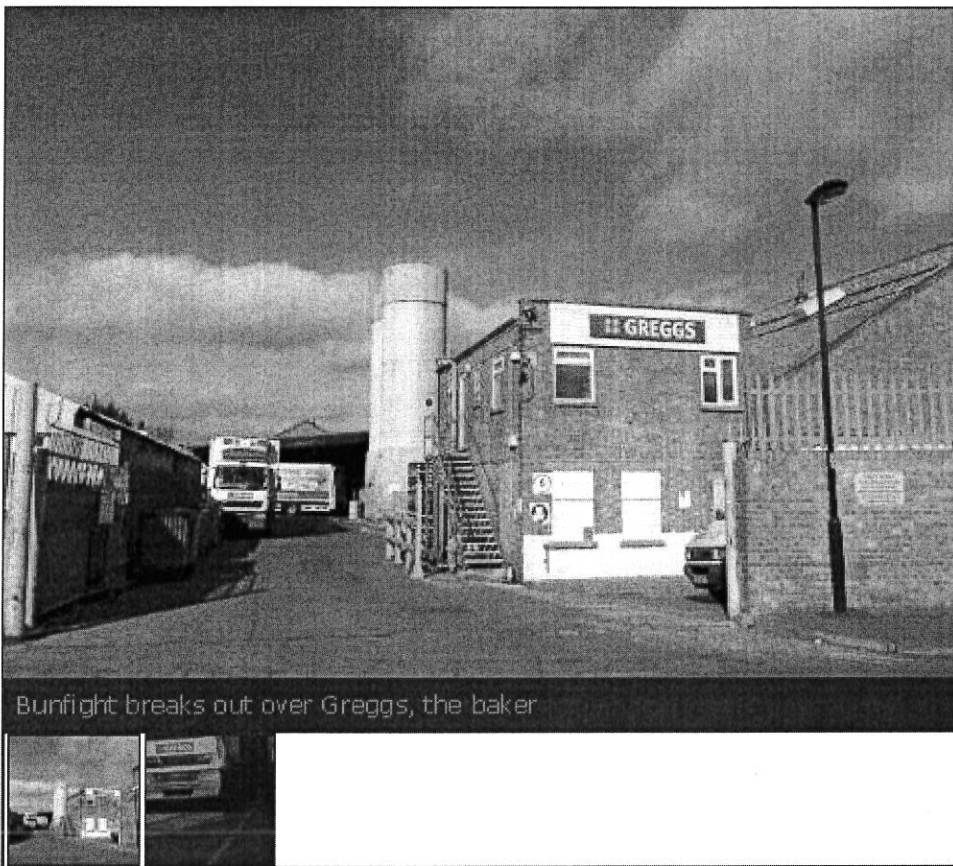
# Your Local **Guardian**.co.uk

## **RICHMOND**

### **Bunfight breaks out over Greggs' Twickenham depot**

Exclusive By Rachel Bishop

5:40pm Friday 24th February 2012 in  
Richmond



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

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

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

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

Don't be afraid to talk  
about mental health.

**it's time to talk. it's  
time to change**  
let's end mental health discrimination

Find out how >

Alan Martin, of Edwin Road, has lived on the street for 24 years with his wife, Sue Powell, who has lived there for 35 years.

This morning he was so incensed by problems the lorries were causing, including noise and congestion which he said made a young mother dodge through each vehicle, that he

stood in front of one and refused to move.

The 62-year-old sculptor said: "I saw out the window one of the mums with a pushchair avoiding the trucks. I went out to her and she said she was used to it.

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

However, despite his actions this morning, he did not agree with the attack on the lorry last night.

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

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

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

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

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

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

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[alexanderblastcleaningne31](http://alexanderblastcleaningne31)



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

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

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

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

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

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

Mr Martin said: "I think that they have outgrown their premises, because they have trucks queuing in the road – whereas they should be in the depot.

"They need to go. We all want them to go."

Police were unable to comment.

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### Comments(3)

Teddington Resident says...

8:01pm Fri 24 Feb 12

This company ought to be curbed, they are popping up everywhere selling poor quality products at inflated prices. I believe they originated in the north, it would be good if they went back there and stayed there."

[REPORT THIS POST »](#)

[REGISTER/LOG IN »](#)

twickersargyle says...

11:13pm Fri 24 Feb 12

It's about time a stand was made against the Gregg's factory. We used to live in Crane Road and the noise from their extractor fans was horrendous—and it was 24 hours a day, seven days a week. It is a ludicrous place to have such a huge industrial plant and they



should relocate asap—though they told us they were moving for for five years, and they never did.”

[REPORT THIS POST »](#)   [REGISTER/LOG IN »](#)

Gareth Roberts says...  
12:02am Sun 26 Feb 12

There you go, Twickersargyle, we have more in common than you thought; I also used to live in Crane Road. About 12 years ago.

As it happens my car came off the worse after a Greggs Van reversed into it, crunching up the door and shoving the whole back of the car up onto the pavement. It then drove into the yard as if nothing had happened. Fortunately a neighbour spotted what happened and let me know.

What was particularly galling was the attitude of the drivers and the site foreman. "Got any proof? Not our problem if there's no proof" was very much the order of the day - it was when I did my CSI Twickenham routine and took them to the lorry in question and pointed out the red paint flecks and scuff marks all over the back there was a collapse of stout party.”

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### 3 EMPLOYMENT LAND ASSESSMENT



Nathaniel Lichfield  
& Partners

Planning. Design. Economics.

**LB Richmond Employment Land  
Assessment**

**Final Report**

Greggs Plc

19 August 2016

15334/MS/LBa

Nathaniel Lichfield & Partners  
14 Regent's Wharf  
All Saints Street  
London N1 9RL

**[nlpplanning.com](http://nlpplanning.com)**

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## 1.0 Introduction

- 1.1 Greggs Plc ('Greggs') commissioned Nathaniel Lichfield & Partners ('NLP') to prepare an assessment of employment land issues in the London Borough of Richmond ('LB Richmond') and the area of Twickenham specifically.
- 1.2 The assessment has been prepared in the context of Gregg's interests at the Gregg's Bakery site on Gould Road, Twickenham, and particularly focuses on the future need for employment land in this location. The purpose of the report is to examine the case for the retention of industrial employment uses as opposed to redevelopment of the site for residential-led mixed uses to potentially include some commercial space for start-up businesses.

## Approach

- 1.3 In preparing the employment land assessment, NLP has undertaken the following:
- 1 A review of key employment land evidence base reports and emerging Local Plan policy for LB Richmond overall and the area of Twickenham specifically.
  - 2 A review of relevant property and other market characteristics and statistics, including discussions with commercial property agents active in the South West London commercial property market.
- 1.4 NLP has had regard to relevant guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) and the firm's experience of producing employment land reviews and related assessments for a range of local authority and private sector clients.

## Structure of Report

- 1.5 The report is structured as follows:
- Background to the site, planning policy context and review of the Borough's employment land evidence base (Section 2.0);
  - Overview of current property market signals and stock of employment space in LB Richmond and Twickenham (Section 3.0);
  - Consideration of the qualitative challenges faced by the Greggs Bakery site and how these are likely to influence the site's ability to accommodate industrial uses over the longer term (Section 4.0);
  - Section 5.0 assesses the overall case for the redevelopment of the site for a residential-led mixed use scheme in the context of employment land demand and supply factors and market signals.



2.0

## Site Context and Background

2.1

This section provides an overview of the Greggs Bakery site and reviews the Council's planning policy and evidence base on employment land needs to provide a context for the assessment.

### Site Context

2.2

The site is located on Gould Road in Twickenham, the largest district centre in LB Richmond. A site location plan is included in Figure 2.1. It currently comprises industrial buildings that are used for production facilities by Greggs Bakery. This operation falls within the B2 Use Class. The site is an inverse 'L' shape that extends to 1.1 ha. The buildings take approximately 85% of the site extent with limited storage yard and/or manoeuvring space within the site. Anecdotally there are reports of staff parking on residential streets which would reflect this site:building ratio.

Figure 2.1 Extent of Greggs Bakery Site (red line boundary)



Source: Google Earth Pro (2016)

2.3

The site is predominantly surrounded by residential use, to the south, east and west, in the form of two storey terrace dwellings that are approximately 60 dwellings per hectare. The site's north western extent lies adjacent to 'Crane Mews', a regeneration scheme creating residential use with self-contained space for business as well. The northern boundary of the Bakery abuts the River Crane with the railway line beyond with the Mereway Cottages in between. The north eastern extent of the site is bound by adjacent industrial use and a three storey flatted residential development. The Twickenham Electricity Sub-Station can be found beyond.

- 2.4 The site has two vehicular access points: one is directly off Edwin Road at the south of the site and the second is located to the north-west of the site at the corner of Crane Road and Gould Road. Crane Road and Gould Road are residential streets with on road parking on two sides of the road. Edwin Road is a mixed residential street with access to other industrial units. It is also flanked by parked cars on both sides of the road and narrows with double yellow lines as it joins Colne Road. To the southernmost extent of the site, beyond Edwin Road, lies a small number of units with welders and automotive repair services.
- 2.5 The site's Edwin Road entrance is 264m from the A311 or 317m from the A305 while access onto the strategic A316 dual carriageway is over 2.2 km from the site's entrances. The A316 connects the M3 Motorway to central London. The site is located 6 km from the M3.

## Planning Policy Context

### The London Plan (2015)

- 2.6 The London Plan provides the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. Boroughs' local planning documents have to be in general conformity with the London Plan.
- 2.7 Policy 2.7 of the London Plan, which addresses outer London, states that *"managing and improving the stock of industrial capacity to meet both strategic and local needs, including those of small and medium sized enterprises (SMEs), start-ups and businesses requiring more affordable workspace including flexible, hybrid office/industrial premises"*.
- 2.8 Policy 4.4 of the London Plan requires the Boroughs at a strategic level to:
- a *"adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London, including for good quality and affordable space;*
  - b *plan, monitor and manage release of surplus industrial land where this is compatible with a) above, so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal."*
- 2.9 The London Plan sets out nine matters to take account of in preparing Local Development Frameworks in order to demonstrate how the Boroughs will plan and manage industrial (and other land) in line with the strategic policies. These nine matters include:
- a the need to identify and protect locally significant industrial sites where justified by evidence of demand;
  - b strategic and local criteria to manage these and other industrial sites;

- c the borough level groupings for transfer of industrial land to other uses and strategic monitoring benchmarks for industrial land release in supplementary planning guidance;
- d the need for strategic and local provision for waste management, transport facilities, logistics and wholesale markets within London and the wider city region; and to accommodate demand for workspace for small and medium sized enterprises and for new and emerging industrial sectors including the need to identify sufficient capacity for renewable energy generation;
- e quality and fitness for purpose of sites;
- f accessibility to the strategic road network and potential for transport of goods by rail and/or water transport;
- g accessibility to the local workforce by public transport, walking and cycling;
- h integrated strategic and local assessments of industrial demand to justify retention and inform release of industrial capacity in order to achieve efficient use of land;
- i the potential for surplus industrial land to help meet strategic and local requirements for a mix of other uses such as housing and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal.

- 2.10 The London Plan identifies three types of location for industrial sites: strategic industrial locations; locally significant industrial sites; and other industrial sites. The supporting text to this London Plan policy requires that locally significant industrial sites must be designated on the basis of robust evidence demonstrating their particular importance for local industrial type functions to justify strategic recognition and protection (Paras 4.29 and 4.20).
- 2.11 The London Plan has identified a pan-London annual net release target of 37ha of industrial land use change between 2011-2031 with indication that the greatest scope for transfer being in the east and parts of inner west London, with more limited scope in north and outer west London and restricted scope for release elsewhere. In accordance with Map 4.1 of the London Plan, the Greggs Bakery site lies within an area identified for 'Restricted' release.
- 2.12 The supporting text goes on to state that the redevelopment of surplus industrial land should address strategic and local objectives particularly for housing and social infrastructure and that the release of surplus industrial land should, as far as possible, be focused around public transport nodes to enable higher density redevelopment, especially for housing. In locations within or on the edges of town centres, surplus industrial land could be released to support wider town centre objectives.

## Local Planning Policy

- 2.13 The statutory development plan for LB Richmond comprises:
- a The London Plan (2015)
  - b Core Strategy (Adopted 2009)
  - c Development Management Plan (Adopted 2011); and
  - d Parts of the Unitary Development Plan (Adopted 2005).
- 2.14 The Greggs Bakery site is not allocated for any use within the Saved UDP.
- 2.15 The current Core Strategy includes a local business policy (CP19) that seeks to support a diverse and strong local economy by retaining land in employment use for business, industrial or storage. CP19 also requires development which generates significant amounts of travel to be located in areas that are highly accessible to public transport, encourages the provision of small units and requires mixed use schemes to retain the level of existing employment floorspace. CP19 states that the inclusion of residential use within mixed use schemes will not be appropriate where it would be incompatible with established employment uses on neighbouring sites and prejudicial to their continued operation.
- 2.16 The Core Strategy does not identify any allocations. A Draft Site Allocations Plan DPD had previously been progressed which identified the site as a residential-led allocation to include start-up employment floorspace.

## Pre-Publication Local Plan (2016)

- 2.17 The Pre-Publication version of the Local Plan has been published for public consultation to 19 August 2016. The draft Strategic Vision with regard to jobs and the economy states:
- “The borough's local economy will be successful. Jobs will be readily available and there will be a choice of employment opportunities as the borough's Key Office Areas as well as the industrial land and business parks will have been protected from encroaching residential development. Employment space will have supported new business start-ups and enabled businesses to grow. There will continue to be a high proportion and variety of small local businesses, offering local jobs, and further opportunities for residents to set up their own enterprise.” (Page 14).*
- 2.18 The emerging Local Plan recognises that the business and industrial areas are historically dispersed across the borough and states that they all play an important role in providing business and employment opportunities for the community (Para 3.1.31). The Plan relies on the GLA's Employment Projections (2015) which estimate that the number of jobs in the Borough will total 105,000 by 2031 and 109,000 by 2036, an increase in 18,000 jobs between 2011 and 2031. The Plan uses this evidence to conclude that the borough will experience very strong demand for employment space.

- 2.19 Reported in the emerging Local Plan are the latest employment figures from the Business Register and Employment Survey which show that significant growth has taken place between 2012 and 2014, amounting to an additional 4,500 jobs. Therefore, the Local Plan's strategy seeks to protect and maintain this employment base, and enhance it through new provision to accommodate the expected job growth. The spatial strategy for the Local Plan highlights that the London Plan requires a 'restrictive' approach towards the transfer of industrial land to other uses and this should be adopted in the Borough. The Borough's view is that a cautious approach should be taken to releasing industrial land for other uses.
- 2.20 The emerging "New Policy LP 42" for industrial land and business parks reflects the spatial strategy and states that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. Therefore, it says, the Council will protect, and where possible enhance, the existing stock of industrial premises to meet local needs.
- 2.21 Greggs Bakery is included within the Pre-Publication version of the Local Plan as "locally important industrial land" under emerging policy LP 42. The site which forms part of a proposed West Twickenham Cluster extends to 1.1 ha in addition to units to the south of Edwin Road. The proposed Cluster excludes the units to the east of Greggs Bakery but it is unclear why this is the case. The proposed policy states that in such areas:
- a *"the 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".*
- 2.22 This emerging policy is in contrast to a previous proposal for the site to be allocated for mixed use-development. The Borough Council previously identified the land as part of a wider potential allocation when, in late 2013, it sought comments on a draft Site Allocations Plan. This document sought to allocate the Greggs site and adjoining land known as the 'West Twickenham cluster, Twickenham' (TW11), a key employment site but with scope for a mix of uses to retain levels of employment for start-up /creative workshops and small scale business uses.
- 2.23 The emerging Local Plan also identifies a number of commercial sites that have been declared surplus to operational requirements and are being proposed for mixed use allocation to incorporate an element of residential use. These sites include a number of telephone exchanges and Royal Mail delivery offices in Hampton, Teddington, Whitton and East Sheen (Site Allocation references SA4, SA5, SA6, SA13 and SA26) all of which are located in heavily residential areas surrounded by high density terraced housing. They would appear to suffer from similar access and amenity constraints as the Greggs Bakery site.

- 2.24 Against the backdrop of an increasingly constrained and limited supply of land to accommodate employment (specifically industrial) uses in the Borough (explored in further detail below), the Council has failed through the new Local Plan to provide a robust evidence base and transparent rationale for allocating these and other sites for their respective uses.

## **Employment Land Evidence Base**

- 2.25 LB Richmond has commissioned a number of technical studies relating to employment land needs in the Borough over the past few years to provide an evidence base for the emerging Local Plan, as follows:
- 1 2013 Employment Sites and Premises Study (prepared by Peter Brett Associates).
  - 2 2016 Assessment of Light industrial and Storage Stock in Richmond upon Thames (prepared by LB Richmond).
- 2.26 The key findings and implications arising from these studies are summarised in turn below.

### **2013 Richmond Employment Sites and Premises Study (Peter Brett Associates)**

- 2.27 LB Richmond commissioned an Employment Sites and Premises (ESP) study in 2013 to inform a review of the Council's economic policies in light of changing circumstances and events since the previous Employment Land Study was undertaken in 2009.
- 2.28 The study built an up to date picture of Richmond's employment sites and premises needs and provision, by area and sector, in order to support policy recommendations on the allocation, protection or release of employment sites. It includes a detailed assessment of the Borough's key employment sites and compared this with employment forecasts for the Borough based on long term projections and considered the implications this may have in terms of demand for employment land in the Borough.

### **What does the ESP study conclude about the balance of employment land demand and supply in LB Richmond?**

- 2.29 The study assessed the long term demand for employment land over the plan period based on using the latest GLA employment projections available at the time of analysis, forecasts for office employment set out in the GLA's London Office Policy Review (2012) and also the GLA's forecasts from the Industrial and Warehousing Land Demand Study (2011).
- 2.30 At the time of study preparation, the latest available GLA Borough projections were those published in the 2009 Working Paper 39 in which the GLA used a triangulation forecast method to produce Borough level forecasts, bringing together trend based employment projections, site capacity projections and accessibility projections.



- 2.31 This triangulated forecast implied growth of 2,600 jobs over the 20 years 2011-31 in Richmond, representing a modest increase of 2.9%, or just 0.1% p.a. Although trend employment projections suggested that the Borough had very strong growth potential, these trend projections were constrained both by lack of capacity and by accessibility in the triangulation.
- 2.32 The triangulated employment forecasts showed that there are significant differences by sector with industrial sectors set to decline but also retail, finance and insurance sectors and public service sectors declining over this period. This outlook was broadly consistent with the baseline contextual analysis set out in the 2013 employment land study, i.e. that the property market analysis showed a continuing loss of industrial floorspace and an office market which remained attractive to occupiers even during the recession.
- 2.33 In terms of forecasting demand for industrial land in LB Richmond specifically, the ESP study drew upon the latest edition of the Industrial Release Benchmarks Study (published in 2011) which projected a small decline in the amount of industrial land for Richmond over the period 2011-31 of -1.8ha. Within this overall total there was anticipated to be a decline in demand for traditional industrial offset by an increased demand for warehouse uses and some waste activity (Figure 2.2).

Figure 2.2 Net Demand for Industrial Land Richmond 2011-31

Use	Hectares
Industrial	-18.5
Warehousing	13.1
Waste	3.6
Other	n/a
<b>Total Demand</b>	<b>-1.8</b>
<b>Surplus Vacant Land</b>	<b>0.0</b>
<b>Net Demand</b>	<b>-1.8</b>

Source: London Industrial Release Benchmarks Study

Source: Peter Brett Associates, Richmond Employment Land and Premises Study 2013

- 2.34 The GLA's Land for Industry and Transport Supplementary Planning Guidance (2012) revised the Borough industrial forecasts following a consultation of the Benchmark study. The industrial forecasts for Richmond were revised to a total loss of -4 ha which is equivalent to a loss of -0.2 ha per annum between 2011 and 2031.
- 2.35 The 2013 ESP therefore concluded that there was scope for LB Richmond's portfolio of industrial land to reduce in scale over the study period to 2031. It noted that in many cases this loss would be able to be recycled for other industrial uses but in some cases as industrial sites become redundant through firms moving out it may not be appropriate to recycle for industrial uses. The property market assessment showed that many of Richmond's industrial sites are constrained, often hemmed in by housing or requiring access via residential areas, thereby reducing their attractiveness to industrial occupiers.



### What does the study say about market signals/trends?

- 2.36 The ESP study examined some key regional and local property market trends in order to understand demand and the location and type of demand for B-type uses in the Borough. An overview of the key findings from this assessment is provided in Chapter 3.0 of this report.

### What are the study recommendations with regards to industrial uses?

- 2.37 In light of the decline in demand for industrial land identified as part of the study, the ESP study authors recommend that:
- “All industrial land in the Borough is protected against the release of space to non-employment uses in line with policy EM2 of the Development Management Plan. The fundamental case for protecting this type of space lies at the borough-wide level: whether through cyclical shortage or structural under-representation, the stock of this space is small and fragmented. Even when not especially neighbourly, nor pleasing to the urban fabric, there is no real sign of vacancy other than in the most isolated pockets. In addition much of the space is currently used to service local economy and local residents.” (para 9.14)*
- 2.38 The study notes that larger industrial sites servicing a wider economy are very few and far between and as the buildings near the end of their functional life they will come under pressure for conversion. Many of the sites suffer from real accessibility constraints and for this reason are not likely to meet industrial occupier’s future needs. Mixed use developments with an employment element should be supported on these sites and where possible, space to address the shortage of low-cost and simple “shed style” space that offers utility to a wide range of occupiers from transitional ‘metal bashing’ to new media companies.

### What does the study conclude about the Greggs Bakery site?

- 2.39 A detailed site assessment of Richmond Borough’s key sites was undertaken as part of the 2013 ESP. The Greggs Bakery site was one of 73 sites included within this assessment although the final study report does not provide detailed conclusions from this appraisal exercise for individual sites.
- 2.40 Despite lacking this justification, it notes that the Twickenham area gives the impression of being the “workshop” of the borough. It also suggests that many of the area’s industrial buildings are old, coming to the end of their useful lives and there is likely to be pressure for redevelopment.
- 2.41 The Gregg's site is considered to dominate the supply of industrial space in Twickenham and is noted as being important. The employment land around it was noted to suffer from attritional loss to residential, and unless access can be improved to ameliorate impacts on residential areas, this was considered to potentially present a policy challenge.

### Are the study assumptions robust, evidenced and transparent?

- 2.42 While the 2013 ESP follows a recognised methodology for assessing economic development needs that is broadly consistent with Government guidance, there are some aspects of its approach that make its forecasts of future employment land needs in the Borough less robust. These are set out in turn below.

#### Transparency of site assessment process

- 2.43 As part of the 2013 ESP, the final report stated that a detailed site assessment was undertaken of the Borough's key sites, with a total of 73 sites visited and individually assessed. These site assessments were noted to have followed a standardised assessment template customised to the needs of the study. The aim of this was to give a brief, easy to grasp but comprehensive assessment of each site in a structured manner to enable both comparison between sites and generalisation for sub-markets.
- 2.44 A summary of the findings of the site assessments is presented in Chapter 6 of the ESP study ('The Local Property Market Assessment') broken down by local property markets (one of which comprises Twickenham). For the Greggs Bakery site, the commentary notes that *"the site rather dominates attention, and is obviously important"* and that *"the employment land around it is suffering from attritional loss to residential, and unless access can be improved to ameliorate impacts on residential areas, this could present a policy challenge."*
- 2.45 No further detail is provided in the ESP final report of the key findings and conclusions from the site assessment, and it is therefore difficult to validate or consider the basis and rationale upon which the above commentary is made. The lack of transparency associated with this approach does not meet the London Plan requirement for locally significant industrial sites to be designated on the basis of robust evidence demonstrating their particular importance for local industrial type functions to justify strategic recognition and protection.

#### Scenario development

- 2.46 The GLA's triangulated employment forecasts and its component forecasts provide the foundations for the long term demand projections for LB Richmond within the 2013 ESP. For office uses, long run forecasts for the Borough were taken from the London Office Policy Review (LOPR) 2012 edition. For forecasts of demand for industrial land, the study used the latest edition of the Industrial Release Benchmarks Study (published in 2011) which informed the 2012 Industrial Land SPG.
- 2.47 The study failed to sensitivity test these demand assumptions with more locally gathered feedback and market intelligence to test whether the scale and nature of job growth and demand for land implied by the 2012 LOPR and 2011 Industrial Release Benchmarks Study still remained reasonable at the time of preparation.
- 2.48 It also failed to consider any alternative approaches to estimating future demand for employment land in LB Richmond beyond purely labour demand.

When assessing future economic development needs, Government guidance recommends testing a range of approaches including analyses based on the past take-up of employment land and property which would allow a consideration of past trends in completions of employment space in the Borough and how these trends might change in the future.

- 2.49 Another recommended approach is undertaking demographically derived assessments of future employment needs (i.e. labour supply techniques) to consider the scale and nature of future supply of labour that may be available to take-up employment opportunities in the Borough. The 2013 ESP does not consider either of these approaches as part of its quantitative assessment of demand for employment land over the plan period to 2031.
- 2.50 Finally, whilst the ESP study presents the net requirement for B class space associated with the demand outputs from the LOPR and Industrial Release Benchmarks Study, it failed to convert these to gross requirements for employment space (i.e. the amount of employment space or land to be allocated/planned for) which typically involves making an allowance for some replacement of losses of existing employment space that may be developed for other, non B Class uses as well as a 'safety margin' to reflect the period of bringing forward a site for development.
- 2.51 The study acknowledged the difference between net demand and gross take-up for the purposes of planning, but did not quantify this additional required provision in space or land terms. It is therefore impossible to know exactly how much land for industrial and office uses should be planned for in LB Richmond over the plan period.

### **Industrial market signals**

- 2.52 Although the 2013 ESP study provided a description of regional and local property market trends at various points in the final report, the majority of this intelligence focused upon office uses, which is noted to be the main type of employment space demanded in LB Richmond.
- 2.53 In contrast, very little commentary and intelligence is provided for the industrial property market in and around the Borough (indeed this is referred to as "non-office employment space") making it difficult to be able to compare quantitative demand forecasts and requirements with more qualitative feedback on market signals, needs and gaps. Government guidance states that plan makers should consider forecasts of both quantitative and qualitative need and also its particular characteristics (such as the footprint of economic uses and proximity to infrastructure), yet the 2013 ESP study provided insufficient qualitative evidence to be able to accurately and robustly conclude on the most appropriate approaches to meeting industrial needs in LB Richmond over the plan period.

## 2016 Assessment of Light Industrial and Storage Stock (LB Richmond)

- 2.54 This report was prepared by LB Richmond's Local Plan Team in June 2016 within the context of recent Government policy to provide greater flexibility for change to alternative uses without requiring planning permission as part of its agenda to free up the planning system in order to provide more homes.
- 2.55 In order to help inform the Council's future strategy and response to these changes, an assessment was undertaken of the Borough's Business Parks and Industrial Estates in order to assess the quality of industrial and warehousing stock. This concluded with a series of recommendations as to whether B8 and B1c /B2 stock should be protected, primarily because of the scale and quality of the stock. It was considered by the report that protection of core industrial uses, i.e. general industry, light industry, warehouses, open storage and self-storage could be achieved through identifying the industrial sites within the Local Plan and preventing inappropriate change of use on these designated sites through the implementation of strict policies to protect and enhance the existing employment land.
- 2.56 The Greggs Bakery site was included within the 'West Twickenham Cluster' for the purposes of assessment and this cluster was recommended for designation as a 'Locally Important Industrial Land and Business Park' in the emerging Local Plan. The Council acknowledge within their own quality assessment that the 'West Twickenham Cluster' is one of the poorer performing sites in the Borough, scoring within the bottom 20% in terms of 'quality'. Within their 2016 report, the Council note that in terms of the condition of the building, *"generally, those properties defined as "good" or "high" quality were considered as worthy of protection as were modern buildings and good quality period properties."* The condition of buildings in the West Twickenham Cluster' are described as 'fair', inferring that they are not necessarily worthy of protection.
- 2.57 The 2016 assessment also noted that the GLA's recently published Industrial Land Supply and Economy Study (2015) (described below) demonstrates that Richmond borough has a very limited supply of industrial land which is amongst the lowest of all the London boroughs. Given that the borough's 'restrictive transfer' approach is unlikely to change within the next London Plan, it was considered that locally important industrial estates and business parks should be specifically listed in a new policy and given enhanced protection.
- 2.58 In the locally important industrial land and business parks, it is noted that loss of industrial space will be strongly resisted unless full replacement provision is provided, which should be on-site. New industrial, storage and distribution development, as well as improvement and expansion of such premises, is encouraged in these areas, particularly new B2, B8 or B1(c) floor space, subject to other policies in the Plan. Proposals for non-industrial uses will be resisted unless the proposed uses are ancillary to the principal industrial use on the site.

## 2015 London Industrial Land Supply & Economy Study (AECOM)

- 2.59 This study prepared on behalf of the Greater London Authority (and published in March 2016) assessed the supply of industrial land in London in 2015. It looked at how much industrial land had been released over the period 2010-2015 as well as potential future release of land in the planning pipeline. It provided an up-to-date picture of LB Richmond's industrial land supply and overview of how this stock of space has changed over recent years. Key points for LB Richmond include:
- The Borough recorded one of the lowest rates of industrial land vacancy within London (with industrial vacancy standing at around 1.8% in 2015, compared with 4.1% in the South sub-region<sup>1</sup> and 7.8% across London as a whole).
  - The actual rate of industrial land release (between 2010 and 2015) exceeded the GLA's Land for Industry and Transport SPG benchmark rates of release by nearly 800% (8.8ha released over the 5 year period 2010-2015 compared with a benchmark of 1ha). This means that industrial land has been released to other uses in the Borough at a higher rate than recommended by the GLA across this period.
  - Average rental values for industrial premises in the Borough increased by 10.9% over the five years 2010 to 2015, falling behind the rate of increase across the wider Park Royal/A40/Heathrow area (14.9%) and also the 13.2% recorded across London as a whole.
  - The ratio between residential and industrial land values in 2015 in LB Richmond at 7.8 is higher than the wider Park Royal/A40/Heathrow (2.6) and London (3.2) averages. This relative gap places substantial pressure on industrial land from higher values uses, most notably residential.

## Conclusions

- 2.60 The Greggs Bakery site is located within a predominantly residential area and is heavily constrained by this context. The site has never previously been allocated for employment or industrial uses, and has therefore never previously been considered amongst the Borough's most important sites for employment uses and in need of protection for such uses.
- 2.61 Having previously proposed to allocate the Bakery site back in 2013 for mixed use development that retained an element of employment use on the site, LB Richmond now proposes through its Pre-Publication Local Plan (2016) to designate the site as locally important industrial land. The rationale for this proposed allocation is unclear but would appear to be driven by the London Plan's 'restricted' transfer category for LB Richmond, and also by recent industrial supply side analysis undertaken by the Council in 2016 (drawing upon industrial market indicators presented within the 2015 London Industrial

<sup>1</sup> Comprising the London Boroughs of Bromley, Croydon, Kingston upon Thames, Merton, Richmond upon Thames, Sutton and Wandsworth

Land Supply & Economy Study) which points to the Borough having recorded continual losses of industrial space over recent years. We understand the Borough's policy drivers but do not agree with the particular approach taken to the Bakery site.

- 2.62 Crucially, this proposed allocation does not appear to take account of up-to-date demand side factors, evidence and projections of industrial space needs in the Borough. LB Richmond's employment land evidence base is considered to be out-of-date; the most recent comprehensive objective assessment of employment land demand and supply (LB Richmond ESP study) was undertaken in 2013 and did not recommend that the Greggs Bakery site should be specifically allocated for employment use. It was also prepared to inform the Council's previous draft Site Allocations Plan in 2013 which has since been superseded by the ongoing Local Plan Review. Subsequent employment evidence base studies have sought to update this evidence in a piecemeal and fragmented way, and as such the Council has failed to provide a robust and transparent logic chain to justify the allocation now being proposed. This lack of evidence base and logic chain fails to meet the London Plan requirement for locally significant industrial sites to be designated on the basis of robust evidence demonstrating their particular importance for local industrial type functions to justify strategic recognition and protection.
- 2.63 The 2013 ESP study acknowledged that in some cases, as industrial sites become redundant through firms moving out it may not be appropriate to recycle for industrial uses, particularly in those instances where industrial sites are constrained, hemmed in by housing or requiring access via residential areas, thereby reducing their attractiveness to some industrial occupiers. Mixed use developments with an employment element were recommended to be supported on these sites. The Greggs Bakery buildings are nearing the end of their functional life and fit within this category of constrained industrial sites. This conclusion is also supported by the Council's own assessment of industrial sites prepared earlier in 2016 which described the site as being of 'fair' quality and therefore one of the poorest scoring sites in the Borough.
- 2.64 Within this context, the proposed allocation of the site as locally important industrial land would appear to contradict the Council's evidence on the intrinsic quality and suitability characteristics of the Greggs Bakery site and its potential for supporting industrial activity over the longer term.
- 2.65 The Government's Planning Practice Guidance (PPG) says that authorities should "*develop an idea of future needs based on a range of data which is current and robust*" and "*consider forecasts of quantitative and qualitative need...broken down by economic sectors*", together with the particular characteristics of employment land in the area. Based on the above review, it is considered that the Council's evidence base is deficient in terms of presenting a PPG compliant objective assessment of employment land needs for the Borough and in justifying the need to allocate and/or retain all industrial land. There is no clear evidence on the need to allocate the Greggs Bakery site for employment purposes over the Plan period.

- 2.66 We do not consider the proposed approach to be justified, effective or consistent with national policy. In short, we do not consider the rationale for designation of this site as locally important industrial land to be sound.



## Commercial Property Market Signals

3.0

3.1

This section provides an overview of the current stock of employment (specifically industrial) space in LB Richmond and recent trends and changes to the supply of this space. It then describes current property market conditions in the local and wider South West London area, including recent trends in the demand for and supply of industrial premises. This analysis is based on data from the following sources:

- Commercial floorspace data from the Valuation Office Agency (VOA);
- LB Richmond's monitoring data on commercial space;
- Feedback provided by local commercial property agents; and
- EGi Property Link database and other commercial property sources.

## Stock of Employment Space

3.2

LB Richmond contained some 476,000sq.m of B class floorspace in 2012, the majority (63% or 300,000sq.m) of which related to office (B1a/b) uses.

3.3

The stock of industrial (i.e. manufacturing and warehousing) space in LB Richmond declined by 61,000sq.m or 25.7% over the 12 year period 2000-2012 according to published VOA data (Figure 3.1). This rate of decline was slightly higher than the London-wide average of 19.1% over this period, and also higher than the national (England) average of 3%. This 61,000sq.m of industrial floorspace losses in LB Richmond represented just under 5% of all industrial floorspace that was lost within the outer London Boroughs between 2000 and 2012.

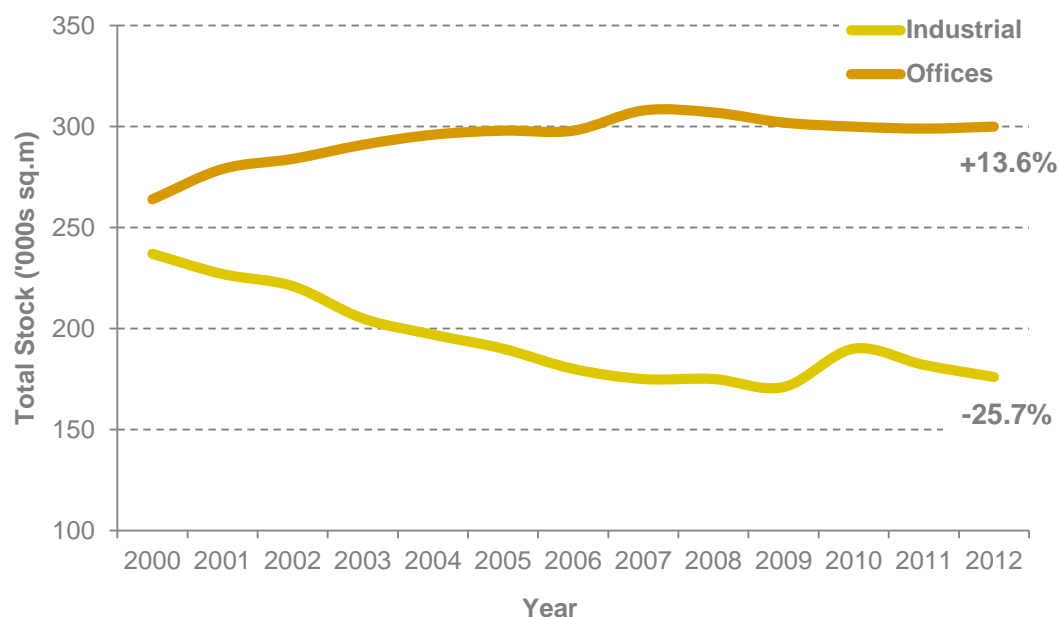
3.4

In contrast, the Borough's office space has gradually increased in overall terms in recent years, by 36,000sq.m or 13.6% between 2000 and 2012 (Figure 3.1). This rate of increase is slightly higher than the London average (12.1%) and significantly higher than across the outer London Boroughs which recorded a 1.2% reduction in office floorspace over this 12 year period.

3.5

It should be noted that the period of analysis presented above pre-dates the introduction of Permitted Development Rights (PDR) in May 2013 to allow for change of use of office space to residential without the need to obtain formal planning permission. LB Richmond notes within its Pre-Publication Local Plan (2016) that the loss of employment space due to PDR is a major concern with 234 Prior Approvals having been approved between May 2013 and February 2016. If implemented in full, these approvals would result in a potential loss of 81,978sq.m of office floorspace.

Figure 3.1 Change in Total Stock of Employment Floorspace in LB Richmond, 2000-2012

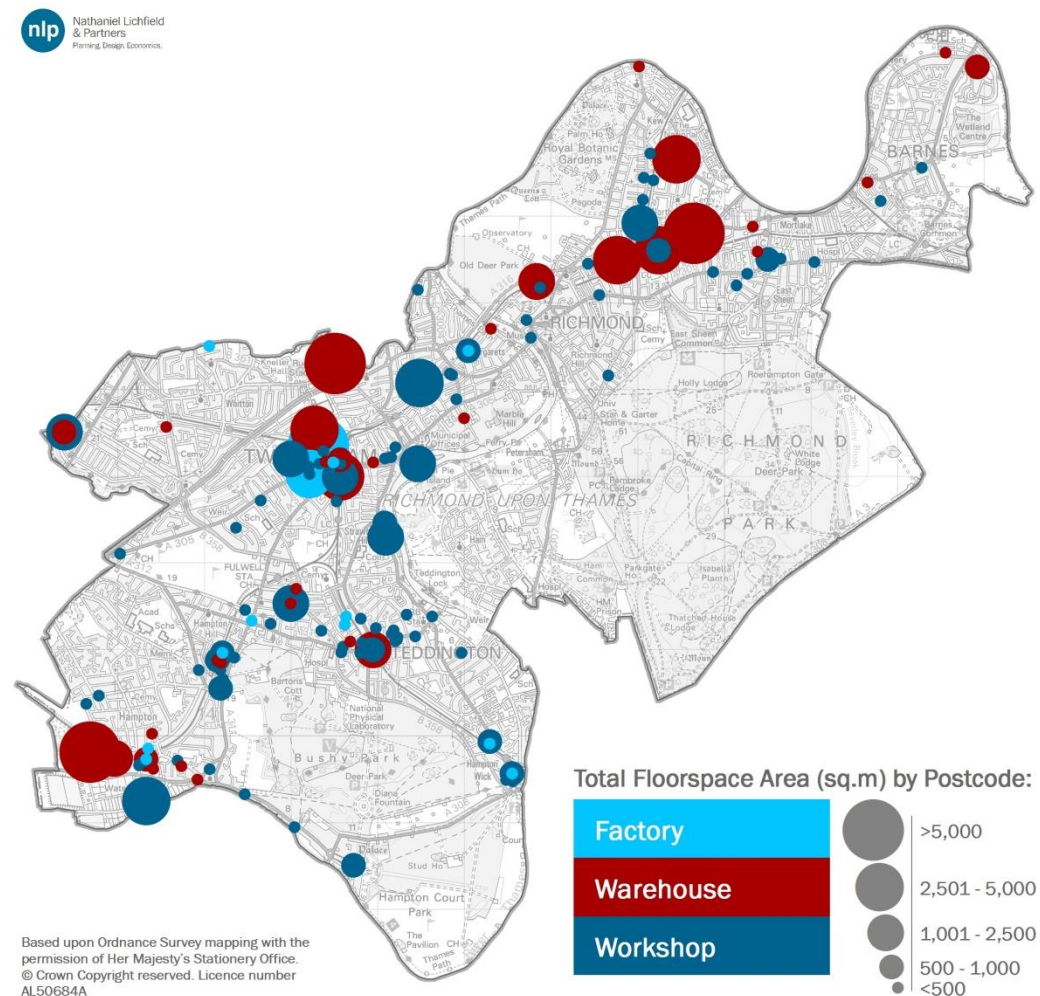


Source: VOA Business Floorspace Statistics 2012 / NLP analysis

## Spatial Distribution

- 3.6 Figure 3.2 shows the distribution of floorspace by broad industrial category across LB Richmond using latest available VOA data. This illustrates the role that the areas of Twickenham, Richmond Town and to a lesser extent Hampton and Teddington play in accommodating the Borough's stock of industrial space. Whilst all of these areas have a stock of workshop and warehousing space (of varying sizes and scales), Twickenham stands out as accommodating the most sizeable cluster of factory space in the Borough, with the stock of factory space elsewhere in the Borough much lower and less significant by comparison.
- 3.7 This mapping analysis also underlines the importance of the A316/Chertsey Road corridor in influencing the distribution of industrial floorspace in LB Richmond, with the majority of industrial space located in close proximity to this route which traverses the Borough in an east-west direction. Further away from this corridor, clusters of industrial space tend to be dispersed more unevenly in and around Teddington and Hampton to the south and west of the Borough, and also tend to be smaller in scale as illustrated by Figure 3.2.

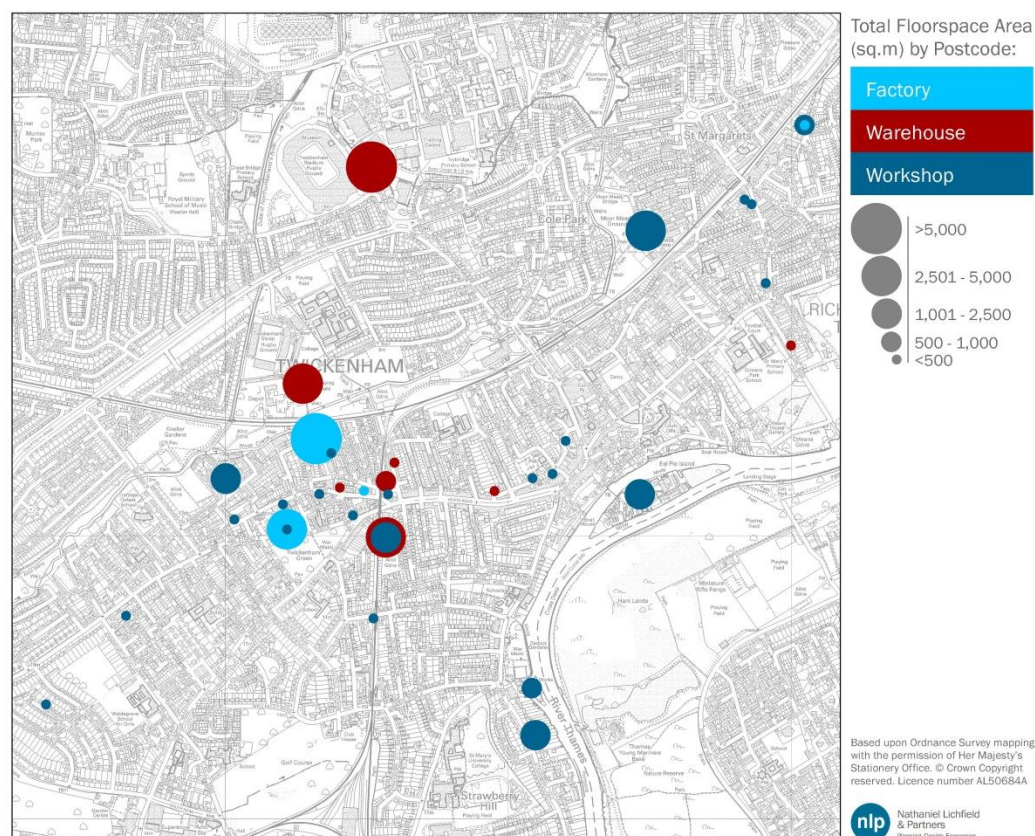
Figure 3.2 Spatial Distribution of Industrial Floorspace in LB Richmond



Source: VOA 2010 / NLP analysis

- 3.8 A more detailed analysis of VOA industrial floorspace recorded in the Twickenham area of the Borough is shown in Figure 3.3. This shows that industrial space is scattered across the local area, but with a notable cluster to the west of Twickenham town centre. There are also sizeable industrial premises located to the north of the Twickenham railway line, and also some smaller units alongside the River Thames.
- 3.9 The Greggs bakery site (recorded by the VOA in 2010 as accommodating around 7,230sq.m of factory space) represents one of the largest industrial premises in the Borough, with only two other premises being larger in scale (comprising a 9,100sq.m warehouse on Lower Richmond Road in Richmond and a 10,630.sqm warehouse on Rugby Road in Twickenham).

Figure 3.3 Spatial Distribution of Industrial Floorspace in Twickenham



Source: VOA 2010 / NLP analysis

## Local Property Market Characteristics

### Industrial Business Base

- 3.10 Data analysis undertaken as part of the 2013 ESP Study shows that around 47% of businesses in Richmond Borough operate in B-space occupying sectors. The majority of these B-space businesses are located in the core centres of Teddington, Twickenham, Richmond Town Centre and Fringe area and in the East Sheen & Barnes area. Whilst there are generally few industrial and warehousing employers in the Borough, the largest concentrations of these businesses can be found in Twickenham, Richmond Fringe, Teddington and Hampton.
- 3.11 Data analysis also shows that the majority of the industrial and warehousing business in the Borough are micro businesses servicing the local economy e.g. auto repair stations; storage; repair workshops and small scale production and are scattered around the Borough.
- 3.12 Industrial sectors in LB Richmond have continued to decline in the recent past with some growth in working proprietors in construction and manufacturing sectors. As a result Richmond has a relatively small industrial and warehousing business base.



## Industrial Property

- 3.13 Property market analysis contained within the 2013 ESP Study shows that the majority of activity within LB Richmond has historically been in the office market and office development continues to represent the main type of employment space demanded in LB Richmond.
- 3.14 Despite the Borough's close proximity to Heathrow, there is a noticeable shortage of utility style space rooted in the shed/ industrial market. West London's shed market is clustered much nearer Heathrow, and this shows up in a marked absence of distribution activity in Richmond. There is very little industrial space that is modern, apart from one scheme in Hampton - Kempton Gate - which is noted by the study as having good quality space and serves more of a local or sub-regional distribution hub than "big sheds".
- 3.15 Industrial premises, whether of good quality or not, are thinly scattered around the Borough. Further, that which is present is often hemmed in by housing, or requires access via residential areas and this presents a real challenge in planning terms. Marginal activities are an important part of this local offer and supply is rather limited, at least in part due to a relative shortage of railway arches and similar "backland" space.
- 3.16 Demand for industrial space in the wider South West London market is reported by local and regional property agents to be strong, with the majority of enquiries tending to fall within the 5,000sq.ft-10,000sq.ft size bracket and generally coming from delivery/logistics firms who also require car parking space within the site. The supply of industrial space is reported to be limited across all size brackets and across the whole of South West London.

## Role of Twickenham as a Business Location

- 3.17 Twickenham is described by the 2013 ESP Study as a secondary centre and somewhat struggling in comparison to Richmond Borough standards. Squeezed between Richmond and Teddington, Twickenham is historically seen as an overspill centre for Richmond accommodating those unwilling to pay Richmond prices, or unable to find sufficient space.
- 3.18 Much of the recent industrial market activity has been driven by occupiers being pushed out of more central London locations such as Battersea and Wandsworth but still wanting to retain their workforce and customer base. Twickenham tends to operate within the A316 (and to a lesser extent A3) broad property market corridor in this respect, facilitating this flow of occupiers and linking Twickenham with strategic routes such as the M3 and M25.
- 3.19 As noted previously, Twickenham is considered by the study to be the "workshop" of the Borough with the Greggs Bakery site dominating attention. Meanwhile, the employment land surrounding it is suffering from attritional loss to residential, and unless access can be improved to ameliorate impacts on residential areas, this was identified by the 2013 ESP Study as presenting a key challenge going forward.

- 3.20 The need for regeneration in Twickenham has been recognised by the Council and an Area Action Plan (AAP) has been produced which identifies five key opportunity areas. The AAP proposes new employment floor space as part of mixed use development schemes and the retention and enhancement of existing employment uses to meet modern day needs. It should be noted that the Greggs Bakery site lies outside of the Twickenham AAP defined area.

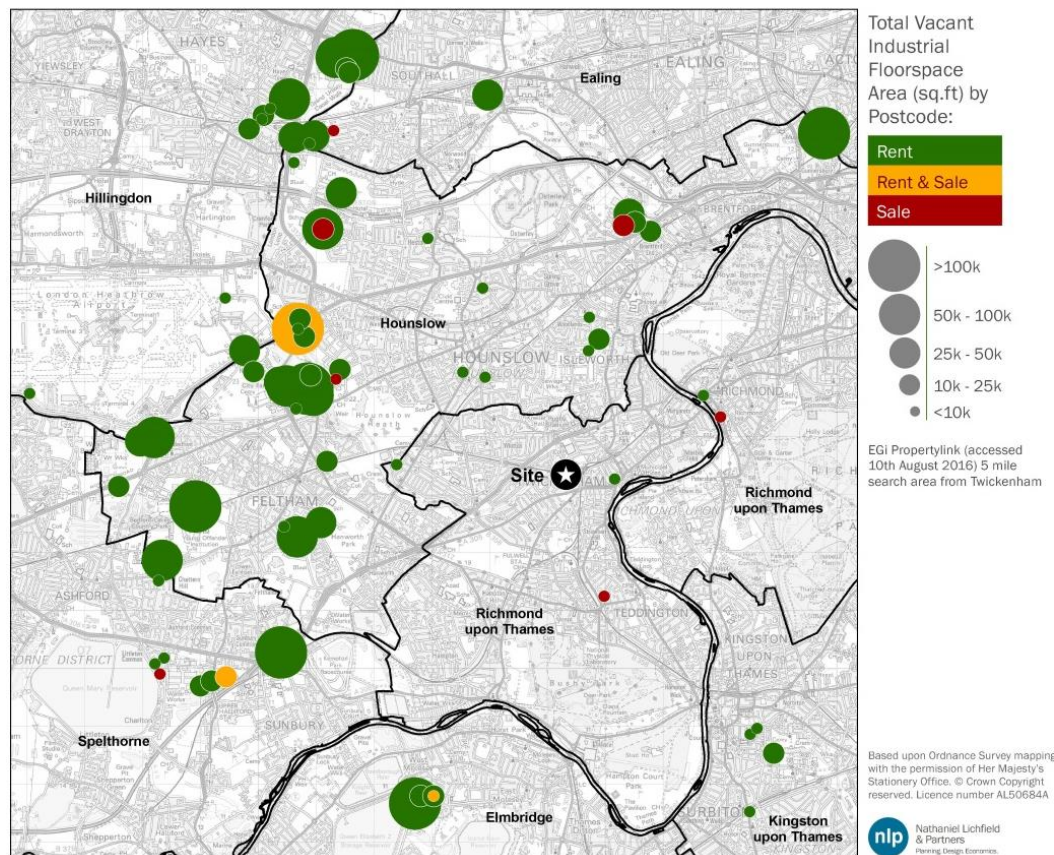
## Market Signals

- 3.21 In line with the provisions of the PPG, it is useful to consider market signals in order to understand local market conditions for industrial space of the type and nature of that accommodated on the Greggs Bakery site.

## Vacancy

- 3.22 Based upon a search of the EGi Propertylink database in August 2016, there are currently 130 industrial properties available to rent, for sale or both within a five mile radius from Twickenham. Of the 130 properties, 118 are for rent, 8 are for sale and 4 are for either rent or for sale.
- 3.23 Figure 3.4 illustrates the spatial extent of the available properties and the size of those units. Where the units are available in a range of sizes with the ability to subdivide into smaller units, the map illustrates the maximum floorspace available in that group of units.

Figure 3.4 Available Industrial Properties (5 mile radius from Twickenham)



Source: EGi Propertylink (at August 2016)

- 3.24 The map highlights that there are few industrial properties currently available for rent or sale within LB Richmond. The greatest concentration, scale and options for industrial units within five miles of Twickenham are in the adjacent London Borough of Hounslow, partly reflecting its proximity to the M3 and M4 motorways and Heathrow Airport.
- 3.25 EGi Propertylink shows that these properties range from 650sq.ft in Spring Grove Road to 200,000sq.ft at the Vantage design and build scheme in Hounslow. The vacant properties range in age and flexibility to meet modern needs.
- 3.26 This vacancy analysis underlines the relatively limited scale of market churn, activity, and opportunities within LB Richmond's industrial market and helps to substantiate previous feedback (including that presented within the 2013 ESP Study) about the declining role of the Borough as an industrial location. In contrast, industrial markets in adjoining areas such as Hounslow, Heathrow and Park Royal are much larger in scale and characterised by comparatively more activity and occupier demand (as well as land availability). LB Richmond is becoming increasingly unable to compete with these larger markets for occupiers and investment.



## Development Rates

- 3.27 There is no published annual reported information on the gains and losses of employment floorspace for 2014/2015. The Borough's latest available Annual Monitoring Report (AMR) data for 'employment' was published in December 2014 and covers the financial year 2013/14. However, this only considers the gains and losses of office floorspace.
- 3.28 The most recently available AMR that does include information on industrial floorspace is dated December 2013 and considers the financial year 2012/2013. Annual Indicator 65 for 2012/2013 states that there was a net loss of 13,829sq.m of employment floorspace. Of this, 84sq.m involved the gain of B2 (industrial) floorspace and 1,017sq.m of industrial floorspace was lost to other uses, resulting in an overall net change for that year of -933sq.m. This is broken down by site in Table 3.1.

Table 3.1 Gains and Losses of B2 Employment Floorspace in 2012/2013

	From (Use Class)	To (Use Class)	Gains (sq.m)	Losses (sq.m)	Notes
8 Nelson Road, Twickenham	B8	B2	84		Builders yard to car repairs
Lion Boathouse (ground Floor) Eel Pie Island, Twickenham	B2	C3		65	
14a King Street, & Retreat Road, Richmond	B2			712	Demolition of redundant print works
127 Colne Road, Twickenham	B2	D1		240	
<b>Total</b>			<b>84</b>	<b>1,017</b>	
<b>Net change (All B)</b>				<b>- 933sq.m</b>	

Source: LB Richmond AMR 2012/2013

- 3.29 Looking at preceding AMR's dating back to 2007/2008 (before which an alternative method to reporting floorspace had been used), there has been a total loss of gross external industrial floorspace of 1,957sq.m in net terms across the Borough. Table 3.2 presents this data on a year by year basis.
- 3.30 This total floorspace loss figure is equivalent to around 325sq.m per annum on average over the monitoring period. This compares with headline VOA floorspace data (presented in Figure 3.1 above) which indicates that LB Richmond has been losing approximately 200sq.m of industrial floorspace per year on average in net terms between 2007 and 2012.
- 3.31 It should be noted that although LB Richmond's 2016 Assessment of Light Industrial and Storage Stock provided an overview of industrial land release in the Borough in broad terms, it did not provide any further detail of industrial floorspace gains and losses on a site-by-site basis.

Table 3.2 Annual Change in gross external industrial floorspace in LB Richmond, 2007-13

AMR Reporting Year	Net change (sq.m)
2012/2013	-933
2011/2012	-2,039
2010/2011	-4
2009/2010	-485
2008/2009	-109
2007/2008	1,613
<b>Total (2007-13)</b>	<b>-1,957</b>

Source: LB Richmond Annual Monitoring Reports (2007-13)

- 3.32 This pattern of gradual erosion of industrial floorspace is not unique to LB Richmond. The majority of London Boroughs have recorded a similar pattern of erosion as economic activity shifts away from manufacturing and production towards services and consumption related activity.

## Conclusions

- 3.33 Industrial space in LB Richmond is concentrated within a number of key commercial centres including Twickenham, and is generally clustered along the Chertsey Road corridor. Greggs Bakery represents one of the largest industrial premises in the Borough, with other industrial premises generally being smaller in scale.
- 3.34 Many of the Borough's industrial sites are found in unsuitable locations, with increasing pressure from incompatible uses (most notably residential) providing a key challenge to continued viability and attractiveness for industrial occupiers. These amenity issues pose a problem in Twickenham (as noted by the 2013 ESP Study and Twickenham AAP) and for the Greggs Bakery site in particular.
- 3.35 Office uses represent the key driver of LB Richmond's commercial property market, while the Borough's stock of industrial space has been gradually declining over recent years and this trend is echoed across the majority of London Boroughs. The Borough's proximity to a number of larger, more established industrial centres (such as Hounslow and Heathrow) coupled with its eroding industrial stock makes it increasingly unable to successfully compete for occupiers and investment.
- 3.36 An analysis of industrial space vacancy in LB Richmond reflects the relatively limited scale of market churn, activity, and available opportunities within the Borough's industrial market and underlines the secondary role that the Borough plays as an industrial location, particularly when compared with other more established industrial centres within the adjoining areas of Hounslow, Park Royal and Heathrow.

4.0

## Site Characteristics and Challenges

4.1

This section considers some of the qualitative challenges faced by the Greggs Bakery site and how these are likely to influence the ability of the site to accommodate industrial uses over the longer term. It concludes by examining how well emerging Local Planning policy is aligned with this more qualitative evidence on the potential role of the site in future.

### Qualitative Assessment

4.2

In undertaking a qualitative assessment of the Greggs Bakery site, it is evident that there are significant physical and amenity constraints which are likely to prevent continued or transformed industrial operations.

4.3

The inverse 'L' shaped site extends to 1.1 ha and is nearly 190m long and typically 45m wide. At its northern extent the site extends to approximately 85m wide. It is generally level. From our desktop analysis, there do not appear to be any nature conservation, arboricultural, or sensitive landscape constraints affecting the site. The boundary constraints of the site mean that there is no room for expansion of the existing bakery facility to allow for future business growth.

4.4

There are two conservation areas in close proximity to the site: Hamilton Road (LPA ref no. 72) and Twickenham Green (LPA ref no. 9). The Hamilton Road conservation area extends to Warwick Road, the electricity sub-station to the north and parts of Edwin Road and is 45 m east of the site. Edwin Road forms one of the two entrances into the Greggs Bakery site. Twickenham Green conservation area is located over 100m to the south of the site. Although the Greggs Bakery site does not fall within either of these two conservation areas, its proximity to them is likely to influence the nature of any future redevelopment on the site.

4.5

As set out in the site context section of this report, Greggs Bakery is located within a predominantly residential area. There are adjoining residential properties on two thirds of the site's perimeter boundaries. This proportion rises to three quarters if the Mereway Cottages immediately across the River Crane are included. The residential area is densely developed with terrace housing at approximately 60 dwelling per hectare and therefore a number of properties are directly and indirectly affected by the current operations of the manufacturing site.

4.6

NLP understands that the site benefits from an unrestricted planning permission which allows the use of the site for 24 hour operations, with no restrictions on access, servicing, noise or emissions. Notwithstanding the clear inadequacies of the buildings themselves which are set out in detail below, future occupiers operating within the existing units could continue to undertake use class B2 industrial operations without further recourse to the local planning authority.

- 4.7 The current operations are bakery related manufacturing. However, within the existing unrestricted planning permission, the full range of B2 uses could include other heavier industrial manufacturing processes, production of building materials, waste processing and garage repairs and vehicle testing which all are likely to create significant adverse impacts for the local residential neighbourhood.
- 4.8 While environment regulations may be in place for some operations, e.g. through waste permits, we are aware of many examples where such controls are not effective and there are continued adverse impacts upon the local communities. Should robust environmental controls be possible through permitting by the Environment Agency, many potential occupiers of the units will be constrained by the extent to which they will have to mitigate any light, odour, noise, vibration or dust pollution as governed by Environmental Health legislation. This could result in the premises being untenable for those uses given the proximity of the residential neighbours and is likely to restrict the types of B2 users that would ultimately consider the site to be viable for their operations. It should also be noted that any such mitigation measures would arguably be harder to enforce should the site be redeveloped to accommodate multiple occupiers (as opposed to the existing single occupier), with greater scope for amenity issues created by multiple industrial users or onerous conditions attached to planning permissions which restrict use by most Class B2 and B8 uses.
- 4.9 Where pollution outputs created by the occupier could be controlled through the relevant legislation and/or permitting, there are other factors which do not have any existing controls. These include: volume and type of large vehicle movement through the residential streets or the times of day that they are permitted to move and the on-street waiting of the goods vehicles due to limited space within the site to accommodate them. A transport report recently prepared by JMP, which is submitted alongside these representations, concludes that the surrounding roads are not of a sufficient size to accommodate the HGV's associated with industrial use.
- 4.10 Vehicular access to serve the industrial unit is poor. Access to the Bakery is via residential streets with cars narrowing the road for larger vehicles. There is no turning area outside the site for lorries and the service yard is small and significantly constrained. The strategic road network lies 2.2 km to the A316 dual carriageway and 6 km from the M3. Heathrow Airport is located approximately 8 km from the site. While pedestrian access is reasonable through residential streets, the public transport accessibility score is only PTAL 2. However, there are two bus stops within 404-452 m providing frequent services to Twickenham Green which takes between 12 and 18 minutes for the full journey. Complaints have been reported from local residents regarding cars that have been damaged from the vehicles visiting the industrial unit.
- 4.11 Greggs Bakery has previously advised LB Richmond of the substandard quality of the bakery buildings, including evidence of asbestos within the buildings. The age and quality of premises mean that there are on-going and

unsustainable costs of maintaining the buildings for Greggs Bakery or any business which sought to occupy the existing units.

- 4.12 Existing development on the site is of a very high density and this limits the scope and scale of industrial activities that could realistically be supported on the site. As noted previously, local and strategic road access is poor and on-site car parking is very constrained with operations significantly impacted by controlled parking measures in the area surrounding the site. The type, scale and location of the industrial premises is not considered to be reflective of current industrial market demand in and around LB Richmond and the majority of potential occupiers would be forced to make significant compromises in order to continue industrial operations on the site in future.
- 4.13 A combination of these maintenance costs, problems with the building fabric and physical constraints of the site led Greggs to a decision to search for alternative premises in the late 1990s. Having been unable to identify a suitable replacement site in the local area, the bakery facility is now planned to be relocated to Enfield over the next year, resulting in the loss of a major employer.
- 4.14 From a market perspective, the units are not flexible or suitable for modern industrial operations. The 2013 ESP Study also noted that many of the Borough's industrial sites and premises are reaching the end of their working lives, are of a poor quality and are no longer considered to be fit for purposes in terms of meeting business needs. Indeed, the Borough will struggle to maintain its industrial economy if space of the right type/quality and in the right location is not available.
- 4.15 Colliers has previously reported to LB Richmond that Greggs Bakery has struggled to operate the site in a satisfactory manner since it was acquired in 1994. Greggs Bakery has experienced difficulties in managing the relationship with the community and tensions continue despite exhaustive attempts by the Company to alleviate amenity concerns. It is considered that the amenity impacts are a function of industrial premises being located within a constrained site with poor accessibility for large vehicles.
- 4.16 There are a significant number of indicators from this assessment that show that the existing site is not fit for its industrial purpose and is heavily constrained by its shape, location, proximity to its residential neighbours, vehicular access and lack of room for expansion. Further, the buildings are aged, in poor condition and require burdensome ongoing maintenance costs. It is considered that the buildings are no longer reasonably suitable for alternative tenants and the site is not suitable for uncontrolled industrial uses. Any controlled industrial uses are likely to need significant and extensive mitigation controls in place to reduce any impacts to an acceptable level. These controls may render alternative industrial uses unviable given the context of the site.
- 4.17 As Greggs no longer require the Bakery site and the buildings have come to the end of their useful life, the question is whether any firm would redevelop it

for industrial uses. This should be explored further but we expect such redevelopment schemes would be heavily constrained.

### **An Alternative Employment Use**

- 4.18 Whilst it is recognised that the long term industrial operation of the site is unacceptable from both a business and community perspective, Greggs are committed to securing the best long-term use for the site and are of the opinion that it could contribute to continued employment generation through a mixed-use residential development. This has the potential to increase the number of employees accommodated on site by incorporating a significant amount (up to 2,757sq.m) of flexible start-up and small scale hybrid business space, with an anticipated focus on office uses.
- 4.19 Feedback from local and regional commercial property market agents indicates that availability of office space is currently limited across the wider South West London market and LB Richmond more specifically, with the recent introduction of PDR for change of use from office to residential having removed significant amounts of office stock from the market over the last few years. Twickenham in particular is reported to have been successful in accommodating office occupiers who have been pushed out of more prime locations such as Wimbledon and Richmond.
- 4.20 The area around Twickenham provides an attractive location for start-up, small scale office space, currently characterised by a buoyant market for this type of flexible workspace. Demand is reported to be strong, driven by both local firms seeking a start-up base and larger corporate occupiers seeking to decentralise from Central London and encourage more efficient working practices. Limited availability of flexible office space in locations like Chiswick, Hammersmith and Richmond which have traditionally accommodated this type of provision is also pushing occupiers out to locations like Twickenham.
- 4.21 There are a couple of existing hybrid/flexible business centres in Twickenham including Regal House next to the station (part operated by Regus) and a number of units at Links Industrial Estate which provide a mix of office and workshop type space. The office element of these facilities is reported to be largely full, and there is considered to be latent demand in the local area for additional provision of this type, especially for new purpose built space.

### **Quality and Suitability of Borough Employment Sites: Evidence from the 2013 ESP Study**

- 4.22 The Richmond Employment Sites and Premises (ESP) Study (March 2013) prepared for the Council states that there are generally few industrial and warehousing employers in the Borough and that the largest concentrations of these businesses are found in Twickenham, Richmond Fringe, Teddington and Hampton. As noted previously, the Study also shows that the majority of the industrial and warehousing business in the Borough are micro businesses servicing the local economy e.g. auto repair stations; storage; repair

workshops and small scale production and scattered around the borough. It was noted that there are very few large industrial sites in the Borough and some of the industrial sites have been lost to other non-employment uses in the Borough. The Study concluded that in terms of employment land, these sites are most vulnerable to conversions to non-employment uses.

- 4.23 The Study also considers the quality and suitability of the Borough's industrial sites and buildings. It considers that they are often old, coming to the end of their useful lives and there is likely to be pressure for redevelopment. In terms of Twickenham specifically, it recommends that a better, more attractive mix of uses near the station, and work to improve access to secondary space to the west would greatly help to improve the stock. The Study considers that the Greggs Bakery site 'dominates attention' and is 'obviously important' but that the land around it is 'suffering from attritional loss to residential' uses recognising that access would need to be improved to 'ameliorate impacts upon residential areas' or it would 'present a policy challenge'.
- 4.24 Whilst the report identifies other industrial units in Twickenham and highlights that the largest site - Twickenham Industrial Estate - lies within adjoining LB Hounslow, it makes limited judgment on the quality of the units individually and does not provide a definitive conclusion for the Greggs Bakery site. It does note that the Borough's industrial buildings are often old, coming to the end of their useful lives and there is likely to be pressure for redevelopment.
- 4.25 In the report conclusions, the authors considered that the Borough has few industrial sites and many of these are constrained by accessibility factors adding that Hampton and Twickenham are the Borough's key industrial property markets. In its recommendations, the Study concludes that:
- "the fundamental case for protecting this type of space lies at the borough-wide level: whether through cyclical shortage or structural under-representation, the stock of this space is small and fragmented. Even when not especially neighbourly, nor pleasing to the urban fabric, there is no real sign of vacancy other than in the most isolated pockets. In addition much of the space is currently used to service local economy and local residents" (Para 9.14).*
- 4.26 Notwithstanding this, the report goes on to note that:
- "larger industrial sites servicing a wider economy are very few and far between and as the buildings near the end of their functional life they will come under pressures for conversion. Many of the sites suffer from real accessibility constraints and for this reason are not likely to meet industrial occupier's future needs. Mixed use developments with an employment element should be supported on these sites and where possible, space to address the shortage of low-cost and simple "shed style" space that offers utility to a wide range of occupiers from transitional 'metal bashing' to new media companies" (Para 9.15).*
- 4.27 The conflicting nature of these recommendations coupled with the absence of a transparent quality assessment of the Borough's employment sites means



that the 2013 ESP fails to provide a clear rationale for any future strategy or approach to retaining, releasing or redeveloping the Greggs Bakery site.

## Conclusions and Alignment with Emerging Planning Policy

- 4.28 The emerging Local Plan policy LP 42 appears to reflect recognition by the Council that the Borough needs to maintain its existing stock of industrial land and slow down the rate of industrial floorspace losses that have been occurring in the Borough. This policy position appears to have been reached against the backdrop of the London Plan 'restricted' transfer category and in response to more recent supply side analysis prepared for the GLA in 2015 which suggests that the rate of industrial land loss in the Borough has exceeded GLA benchmarks over recent years.
- 4.29 LB Richmond are aware of the site's various constraints and factors which undermine the site's ability to accommodate employment – but particularly industrial - uses over the longer term. The underlying unsuitability of the Greggs Bakery site for industrial uses is emphasised by the firm's decision to vacate the site despite trying over a number of years to overcome the physical and financial constraints of operating the site. The Council acknowledge within their own quality assessment of the Borough's light industrial and storage stock undertaken earlier this year that the 'West Twickenham Cluster' (including Greggs Bakery) is one of the poorer performing sites in the Borough and is not considered as being worthy of protection.
- 4.30 In light of these known constraints, it is not clear why the site is being proposed for allocation as locally important industrial land in the 2016 Pre-Publication Local Plan (2016), beyond the assumption that this allocation is proposed in response to a Borough-wide policy to retain industrial land regardless of quality. This lack of a clear site specific logic chain and up-to-date evidence base would therefore fail to meet the London Plan policy requirement that locally significant industrial sites are designated on the basis of robust evidence demonstrating their particular importance for local industrial type functions to justify strategic recognition and protection. The proposed approach is not therefore considered to be sound.

5.0

## Overall Assessment and Conclusions

5.1

This section draws together the analysis and evidence contained in the earlier sections to examine the case for the redevelopment of the Greggs Bakery site for residential-led mixed uses, to potentially include some commercial space for start-up businesses. In doing so it makes clear why NLP do not consider the Council's proposed approach to allocating the site as locally important industrial land to be sound.

### **Is the Council's evidence approach robust on the need to allocate the site for employment purposes (under New Policy LP 42 of the Pre-Publication Local Plan)?**

5.2

The Council's evidence base on employment land matters is considered insufficient in terms of justifying the need to either allocate or retain all remaining industrial land in the Borough, and therefore it does not adequately justify the allocation of the Greggs Bakery site for employment purposes (specifically as 'locally important industrial land').

5.3

In particular, the Council's evidence base does not present a full objective assessment of employment land needs over the plan period taking account of the methodologies advised by the NPPF and PPG. It fails to meet the key PPG requirement to consider forecasts of quantitative and qualitative need for employment land and estimate the scale of future needs based on a range of data which is current and robust.

5.4

The site has never previously been allocated for employment or industrial uses, and has therefore never previously been considered by the Council to be amongst the Borough's most important sites for employment uses and in need of protection for such uses. The principle of allocating the site for a broader range of uses than just employment appeared to be accepted back in 2013 (and this was broadly consistent with the conclusions presented by the 2013 ESP) and it is unclear why the focus and emphasis for allocation has now changed to be purely employment.

5.5

In absence of a clear logic chain, it can be assumed that this proposed allocation has been driven by the London Plan's 'restricted' transfer category for LB Richmond, and also by recent industrial supply side analysis undertaken by the Council in 2016 which points to the Borough as a whole having recorded continual losses of industrial space over recent years, with increasing pressure now being placed on the Borough's remaining sites to accommodate needs going forward.

5.6

Crucially however, this approach fails to take account of up-to-date demand side factors, evidence and projections of industrial space needs in the Borough. It would also appear to contradict the Council's own evidence on the intrinsic quality and suitability characteristics of the Greggs Bakery site and its potential for supporting industrial activity over the longer term. This lack of

evidence and transparent logic chain does not meet the London Plan requirement for locally significant industrial sites to be designated on the basis of robust evidence demonstrating their particular importance for local industrial type functions to justify strategic recognition and protection and therefore cannot be considered to be sound.

### **Is the Greggs Bakery site required to meet future economic and business needs in LB Richmond?**

- 5.7 As noted above, LB Richmond does not have an up-to-date objective assessment of employment land needs and appears to be relying upon economic growth projections and estimates of employment land requirements that were prepared as part of the 2013 ESP using data from 2011 and 2012.
- 5.8 Subsequent technical employment studies by the Council have sought to update this evidence in a piecemeal and fragmented way, although these have focused on supply side issues only and it is therefore difficult to compile an up-to-date picture of the balance between employment (and specifically industrial) land demand and supply in the Borough.
- 5.9 In terms of industrial uses, the 2013 ESP concluded that there was scope for LB Richmond's portfolio of industrial land to reduce in scale over the study period to 2031, driven by a decline in demand for traditional industrial offset by some increased demand for warehouse uses and some waste activity. This means that there is a quantitative case for a reduction in industrial land across LB Richmond overall during the Plan period and therefore not all industrial land in the Borough needs to be retained or specifically protected for such uses.
- 5.10 The Greggs Bakery site has been assessed by both the 2013 ESP and the Council's own assessment of light industrial and storage stock in 2016 with neither study concluding that the site performs particularly well across a range of quality and suitability characteristics and criteria. The 2013 ESP did not recommend that the site be protected for employment uses, and the Council's 2016 assessment did not describe the site as being of "good" or "high" quality and therefore considered worthy of protection.
- 5.11 From a more qualitative perspective, the Greggs Bakery site represents an incompatible use in a largely residential area and suffers from a range of physical and amenity constraints that together are significant enough to undermine the site's ability to accommodate industrial uses over the longer term. A combination of maintenance costs, problems with the building fabric and physical constraints of the site has resulted in Gregg's decision to vacate the site, resulting in the loss of a major employer.
- 5.12 In light of known constraints, it is not clear why the site is being proposed for allocation as locally important industrial land in the 2016 Pre-Publication Local Plan (2016) and it is considered highly unlikely that the site in its current form is capable of meeting the Borough's future economic and business needs.

## Would redevelopment of the site for a mixed use scheme cause harm to local employment land supply?

- 5.13 Industrial uses represent a secondary driver of LB Richmond's commercial property market (behind office uses) and the Borough's stock of industrial space has been gradually declining over recent years, a trend echoed across the majority of London Boroughs. Many of the Borough's industrial sites are found in unsuitable locations, with increasing pressure from incompatible uses (most notably residential) providing a key challenge to continued viability and attractiveness for industrial occupiers.
- 5.14 These amenity issues pose a problem in the Twickenham area of the Borough and for the Greggs Bakery site in particular where the bakery buildings are nearing the end of their functional life. They are unsuited for continued industrial use and this conclusion is supported by the Council's own assessment of industrial sites prepared earlier in 2016 which described the site as being of 'fair' quality and therefore one of the poorest scoring sites in the Borough. The unsuitable nature of the site can also be demonstrated by Greggs' decision to vacate the site by the end of 2016 and relocate to a purpose built facility outside of the Borough.
- 5.15 The 2013 Richmond ESP notes that the Borough's larger industrial sites are very few and far between and as the buildings near the end of their functional life will come under pressures for conversion. Many of the sites suffer from real accessibility constraints and for this reason are not likely to meet industrial occupier's future needs. For these sites, the ESP recommends that mixed use developments with an employment element should be supported on these sites.
- 5.16 The study also notes that *"whilst being a restrictive transfer borough Richmond Borough must seek to identify what employment land it needs to defend, and that where a more pragmatic stance can be adopted, in order to strengthen its case to retain the key sites needed to ensure efficient and sustainable functioning of local activity. The property market assessment indicates that the Borough has few industrial sites distributed through the Borough and many of these constrained by accessibility factors."*
- 5.17 The key message is that the Council should develop a strategy for accommodating the Borough's business needs in future by being selective about which sites to protect for employment uses, focusing on the Borough's best performing sites that are most likely to be attractive and viable for occupiers. Within this context, the Greggs Bakery site has never previously been allocated by the Council for employment uses or considered to be in need of protection. Within the Council's most recent qualitative assessments of employment land supply, the site scores relatively poorly.
- 5.18 Within a previous Local Plan Site Allocation consultation (in Autumn 2013), the Council proposed that the site be allocated for mixed use development, retaining an employment role by providing some employment space for start-up and creative business uses. In light of the evidence presented within this

report, a mixed use approach would appear to represent a pragmatic and sensible future use for the site, given the site's existing constraints and amenity issues, and would also provide the type of high quality flexible, small scale business space (with a focus on flexible B Class uses) that is expected to drive occupier requirements in LB Richmond over the plan period.

- 5.19 Given that the current site largely comprises low density manufacturing floorspace, it is envisaged that the current scale of jobs supported on site (c.200) can be re-provided through a mix of higher density B Class uses. This approach would also enable the site to better meet the needs of local working residents; Greggs confirm that the skill set required to operate the bakery site in its current use means that its (lower skilled) employees commute into LB Richmond from neighbouring Boroughs.
- 5.20 In this respect, it is not considered that the redevelopment of the Greggs Bakery site for a mixed use scheme would cause harm to local employment land supply in LB Richmond. It would be consistent with the recommendations made by the 2013 ESP for the Borough's larger industrial sites suffering from real accessibility constraints to support mixed use developments with an employment element, and would provide a more appropriate mix of employment space of the type demanded in LB Richmond, as well as an opportunity to re-configure the site to better meet the needs of modern business occupiers.
- 5.21 Greggs are committed to securing the best long-term use for the site and a mixed-use residential development has the potential to increase the number of employees accommodated on site by incorporating a significant amount of flexible start-up and small scale hybrid business space, including an element of office uses. Twickenham represents an attractive location for start-up, small scale office space, and demand is reported to be strong driven by both local firms seeking a start-up base and larger corporate occupiers seeking to decentralise from Central London and encourage more efficient working practices. Existing hybrid/flexible business centres in Twickenham are reported to be full, and there is considered to be latent demand in the local area for additional provision of this type, especially new purpose built space.



















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## 4 TRANSPORT ASSESSMENT



## **Greggs Bakery, Gould Road, Twickenham**

### **TRANSPORT STATEMENT**

Report

# Greggs Bakery, Gould Road, Twickenham

## TRANSPORT STATEMENT

Report

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# 1 Introduction

## CONTEXT

- 1.1 JMP Consultants Ltd have been commissioned by Colliers International to provide transport consultancy services for a site located off Gould Road and Edwin Road in the London Borough of Richmond upon Thames (LBRuT), with potential for a residential-led mixed-use planning application. The site currently comprises production facilities for Greggs Bakery but is surplus to requirements and therefore is due to be closed.
- 1.2 The area is typified by primarily residential uses currently and there are limited industrial uses in the locality. However, a number of office-to-residential schemes in the area have been granted planning permission highlighting the increasing transition to residential. The nature of the local area's narrow Victorian terraced streets, in terms of transport and movement, is unsuitable for a modern large scale industrial location and an allocation of the site for industrial or solely office use is not appropriate now or in the future.
- 1.3 A detailed description of the proposed redevelopment is included in Chapter 5 of this report. In brief, the new scheme proposals comprise the provision of approximately 96 residential units and 2,757m<sup>2</sup> of start-up commercial space. The development masterplan is provided in Appendix A.
- 1.4 This Transport Statement (TS) reviews the site's suitability for residential and commercial use in transport terms, and the reasons why industrial development of this nature is not suitable in this location and as a result why the land use designation should be reviewed. It also identifies existing and potential traffic and transport impacts related to the site and its proposed future operation.

## REPORT STRUCTURE

- 1.5 This TS details the transport issues of the existing Greggs site and the potential impacts of the redevelopment proposal. It is divided into the following remaining sections:
  - **Section 2: Policy review** – Provides a summary of the current national and local planning and transport policy that is relevant to the existing and proposed redevelopment;
  - **Section 3: Existing conditions** – Describes the existing transport and highways conditions prevalent at the site and in the surrounding area;
  - **Section 4: Existing site** – Provides an overview of the site's existing use;
  - **Section 5: Redevelopment proposals** – Summarises the redevelopment proposals including proposed access and car and cycle parking arrangements;
  - **Section 6: Multi-modal trip generation** – A multi-modal assessment of trips associated with the existing site and the proposed redevelopment;
  - **Section 7: Suitability of the site for continued industrial use** – Evaluation of the suitability of the site for future industrial or mixed-use; and
  - **Section 8: Summary and conclusion** – Provides a summary of the proposed redevelopment arrangements and its impact on the local area.

## 2 Policy Review

### INTRODUCTION

- 2.1 This chapter reviews current and emerging land use and transport planning policies at national and local government levels, and summarises how the proposed redevelopment should comply and how the existing site is not in compliance with current policy.

### NATIONAL POLICY

#### National Planning Policy Framework (NPPF) (2012)

- 2.2 The NPPF was published on 27 March 2012 and it came into effect immediately, superseding all other national planning policy (except on waste).
- 2.3 The document sets out the government's economic, environmental and social planning policies for England and its expectation for their application. It is meant as high level guidance for local councils to use when defining their local and neighbourhood plans. This approach allows the planning system to be tailored to reflect the needs and priorities of individual communities.
- 2.4 The essence of the document is to support sustainable development, defined as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs' (p.2).
- 2.5 The NPPF defines the delivery of sustainable development through three roles:
- Planning for prosperity (an economic role);
  - Planning for people (a social role); and
  - Planning for places (an environmental role).
- 2.6 It notes that to achieve sustainable development, these roles should be sought jointly and simultaneously through the planning system.
- At the heart of the NPPF is a presumption in favour of sustainable development which 'should be seen as a golden thread running through both plan making and decision taking' (Paragraph 14). In paragraph 15, it goes on to say that 'Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay'.
- 2.7 A sustainable transport mode is described as 'any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport' (Annex 2, p.57).
- 2.8 Paragraph 32 states that developments that generate significant amounts of movement should be supported by a Transport Statement and Transport Assessment. It goes on to state that plans and decisions should take account of whether:
- The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
  - Safe and sustainable access to the site can be achieved for all people; and
  - Improvements can be undertaken within the transport networks that cost-effectively limit the significant impacts of the development. Developments should only be prevented or refused on transport ground where the residual cumulative impacts of development are severe'.

- 2.9 Paragraph 34 seeks to ensure that 'developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised'.
- 2.10 Paragraph 35 goes on to state that 'plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of good or people'. Therefore, developments should be located and designed where practical to:
- 'Accommodate the efficient delivery of goods and supplies;
  - Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
  - Create safe and secure layouts that minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
  - Incorporate facilities for charging plug-in and other ultra-low emission vehicles; and
  - Consider the needs of people with disabilities by all modes of transport'.

## LOCAL POLICY

### Further Alterations to the London Plan (FALP) (2015)

- 2.11 The FALP sets out the Mayor's vision for the development of London up to 2031. It is an overall strategic plan, setting out an integrated economic, environmental, transport and social framework for the development of London.
- 2.12 The Mayor's overarching vision for London is that:
- The city should 'excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change' (para 1.52)
- 2.13 Enabling sustainable modes of transport is considered to support this vision. The Plan notes that London should be:
- 'A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system which actively encourages more walking and cycling and makes better use of the Thames, and supports delivery of all the objectives of this Plan' (Objective 6)
- 2.14 Strategically the Mayor intends to work with all relevant parties to (Policy 6.1):
- Encourage patterns of development that reduce the need to travel, especially by car;
  - Improve the capacity and accessibility of sustainable travel modes such as public transport, walking and cycling;
  - Support development with high levels of trips only in areas of high public transport accessibility;
  - Improve interchange between different forms of travel;
  - Minimise the impact of freight on the transport network;
  - Encourage shifts to more sustainable forms of transport; and
  - Promote walking by ensuring an improved urban realm.
- 2.15 The Gregg's Bakery site is not designated as a Strategic Industrial Location (SIL) in the FALP and therefore is not protected as a main reservoir of London's industrial and related capacity. SILs are typically located close to the strategic road network and are also well located with respect to rail and waterways which can address broader transport objectives. Policy 4.4, on the management of industrial

land and premises, states that the release of surplus industrial land should be planned, monitored and managed so that it can contribute to strategic and local planning objectives, especially those to provide more housing. The plan also states that the release of surplus industrial land should, as far as possible, be focused around public transport nodes to enable higher density redevelopment, especially for housing.

- 2.16 Policy 6.1 states that the plan encourages patterns of development that reduce the need to travel, especially by car, and supports development that generates high levels of trips in locations with high public transport accessibility. The plan also requires that developments do not adversely affect safety on the transport network (Policy 6.3).

### Parking Standards

- 2.17 Table 2.1 summarises the car parking provision standards provided in The London Plan for the relevant elements of the proposed redevelopment. It should be noted that the redevelopment is in an area with a PTAL of 2.

**Table 2.1: Car Parking Standards (The London Plan, 2015)**

Land Use	Standard	Parking Spaces
Residential (suburban) – per unit in areas with PTAL 2 to 4 (maximum spaces)	1-2 bedrooms per unit	Up to 1.5 space per unit
	3 bedrooms per unit	Up to 1.5 space per unit
	4+ bedrooms per unit	Up to 1.5 space per unit
Employment uses – B1	Per 100-600m <sup>2</sup> GIA	1 space

- 2.18 It should be noted that 20% of car parking spaces for new developments in London are required to provide electrical charging points to encourage the uptake of electric vehicles, with residential developments required to provide an additional 20% passive provision for future use and employment uses to provide an additional 10%. For the employment uses, one disabled space should be provided for each employee who is a disabled motorist, with 5% of the total capacity provided as disabled spaces.
- 2.19 The cycle parking standards provided in The London Plan are minimum standards and are summarised below in Table 2.2 for the relevant elements of the proposed redevelopment.

**Table 2.2: Cycle Parking Standards (The London Plan, 2015)**

Land Use	Long Stay	Short Stay
C3/C4 Dwellings (All)	1 space per studio/1 bedroom unit 2 spaces per all other dwellings	1 space per 40 units
B1 Business offices	1 space per 150m <sup>2</sup>	First 5,000m <sup>2</sup> : 1 space per 500m <sup>2</sup> Thereafter: 1 space per 5,000m <sup>2</sup>

### Mayor of London's Transport Strategy (MTS) (2010)

- 2.20 The Mayor's Transport Strategy, published in 2010, contains five main objectives (Chapter 1, para 2):

- Support economic development and population growth;
- Enhance the quality of life for all Londoners;
- Improve the safety and security of all Londoners;
- Improve transport opportunities for all Londoners; and
- Reduce transport's contribution to climate change and improve its resilience.

- 2.21 The Mayor's transport vision for London (Chapter 2, para 29) is that 'London's transport system should excel among those of global cities, providing access to opportunities for all its people and enterprises, achieving the highest environmental standards and leading the world in its approach to tackling the urban transport challenges of the 21st century'.
- 2.22 The Mayor's Transport Strategy gives an indication of the London travel mode share that could be achieved by 2031 with implementation of the Strategy, showing a 3% increase in cycle mode share (to 5% overall) and a 6% decrease in travel by private motorised means (to 37% overall) (p 36).
- 2.23 It is noted that the Mayor will encourage the use of sustainable travel through 'setting appropriate parking standards, encouraging smarter travel planning and making public transport more attractive' (Chapter 4, para 147).
- 2.24 The Mayor notes that TfL will continue to work with boroughs to deliver smarter travel initiatives 'to encourage people to choose between the full range of travel options and increase the share of journeys made by walking, cycling and public transport' (Chapter 4, para 158). The Strategy supports greater cycle participation by making cycling a transport priority. It is noted that 'there will be unprecedented levels of investment in cycling over the next 10 years to improve cycle infrastructure and information' (Chapter 5, para 444).
- 2.25 The Mayor also intends to improve facilities for pedestrians by developing key walking routes between local destinations, enhancing pedestrian space, improving crossing facilities and supporting developments that emphasise greater pedestrian permeability (Proposal 60L).

### **London Borough of Richmond upon Thames Core Strategy (April 2009)**

- 2.26 LBRuT's Core Strategy was adopted in April 2009 and sets out the long-term spatial vision and objectives for the borough. The plan has three key areas that it focuses on:
- A sustainable future;
  - Local character; and
  - Meeting people's needs.
- 2.27 Concerning the future sustainability of the area, the plan states that there is a need to provide for the safe and sustainable movement of people in an area where the road network is often close to capacity. It also states that with regards to meeting people's needs, that there is an acute shortage of housing in the area and there is a need to provide an increased level of all types of housing, including affordable and accessible housing, to meet the demand.
- 2.28 Policy CP1 in the plan concerns sustainable development and seeks to ensure that all new development and refurbishment is as sustainable as possible and located in appropriate and accessible locations to reduce the need to travel by unsustainable modes. The strategy has a target of 95% of all new or converted housing to be built on previously developed land.
- 2.29 LBRuT considers that locating development in sustainable areas and reducing the need to travel by promoting walking, cycling and the use of public transport is the most sustainable way to plan for the Borough's future travel needs. The plan also states that the reducing and management of car travel will contribute to an improvement in air quality, a reduction in traffic noise nuisance and an improvement in the population's health.
- 2.30 Spatial policy CP9 relates to Twickenham Town Centre, to the southeast of the site. The policy states that the LBR intends to revitalise the area to achieve a high quality district centre and will encourage higher density development including affordable and small units and car free development in the town centre. The policy also states that they council is aiming to manage flows and reduce the dominance of vehicles in the town centre environment.



## London Borough of Richmond upon Thames Parking Standards (2011)

- 2.31 LBRuT's parking standards are included in Appendix Four of the Development Management Plan (DMP), which was adopted in November 2011. The car parking standards shown in Table 2.3 are the maximum standards and are relevant for sites outside of controlled parking zones (CPZs), such as the Greggs site in Twickenham.

**Table 2.3: Car Parking Standards (LBRuT, 2011)**

Land Use	Standard	Parking Spaces
Residential (outside of CPZs)	1-2 bedrooms per unit	1 space
	3 bedrooms per unit	2 spaces
	4+ bedrooms per unit	2 spaces
Employment uses – B1 (outside of CPZs)	Per 100m <sup>2</sup>	1 space
	Per 2,500m <sup>2</sup>	1 lorry space per unit

- 2.32 Table 2.4 summarises the minimum cycle parking standards in Richmond for the relevant elements of the scheme.

**Table 2.4: Cycle Parking Standards (LBRuT, 2011)**

Land Use	Standard
C3/C4 Dwellings (All)	1 space per 1-3 bedroom unit
	2 spaces per 4+ bedroom units
B1 Business offices	1 space per 200m <sup>2</sup>

## Twickenham Area Action Plan (July 2013)

- 2.33 The Twickenham Area Action Plan was adopted in July 2013 and forms part of the wider LBRuT Local Plan. The area covered by the plan comprises the central area of Twickenham, including part of the A305 Heath Road to the southeast of the Greggs Bakery site. While the site is not included in the plan area, the route to the A316 Chertsey Road and wider strategic road network requires access through central Twickenham and the plan area.
- 2.34 The plan states that the dominance of vehicular traffic, which adversely impacts on the pedestrian environment, is a key issue in Twickenham. One of the five key themes of the plan is to improve the public realm and reduce the impact of vehicular traffic on the area, making it a safer and more attractive place to visit.

## SUMMARY

- 2.35 This chapter has provided a summary of the relevant national and local policies and has shown that the key policies with which the proposed redevelopment should comply are:
- The proposed redevelopment should be located in an area accessible by public transport, walking and cycling, and the use of these forms of transport by residents and visitors to the site should be encouraged;
  - The proposals do not cause residual cumulative impacts that are severe in terms of road safety or operation, or cause unacceptable environmental intrusion;
  - Car and cycle parking should be provided in line with the London Plan; and

- The scheme should be designed to provide improved circulation and accessibility for pedestrians and cyclists.

2.36 It has also highlighted how the existing site currently does not comply with the policy requirements and would not comply if a new industrial development was proposed, including that:

- Safe and sustainable access cannot be provided for frequent movements of large vehicles due to a constrained local highway network;
- The cumulative impacts of a new industrial development would likely be classed as severe due to a potentially significant increase in the number of HGV trips to and from the site;
- The site is not situated in a location which is practical for the efficient delivery of goods and supplies by large vehicle;
- The layout of the highway around the site access in combination with the frequency of HGV movements does not minimise conflicts between traffic and vulnerable road users; and
- The site is not a Strategic Industrial Location (SIL) and is not located in an area suitable for a SIL.

### 3 Existing Conditions

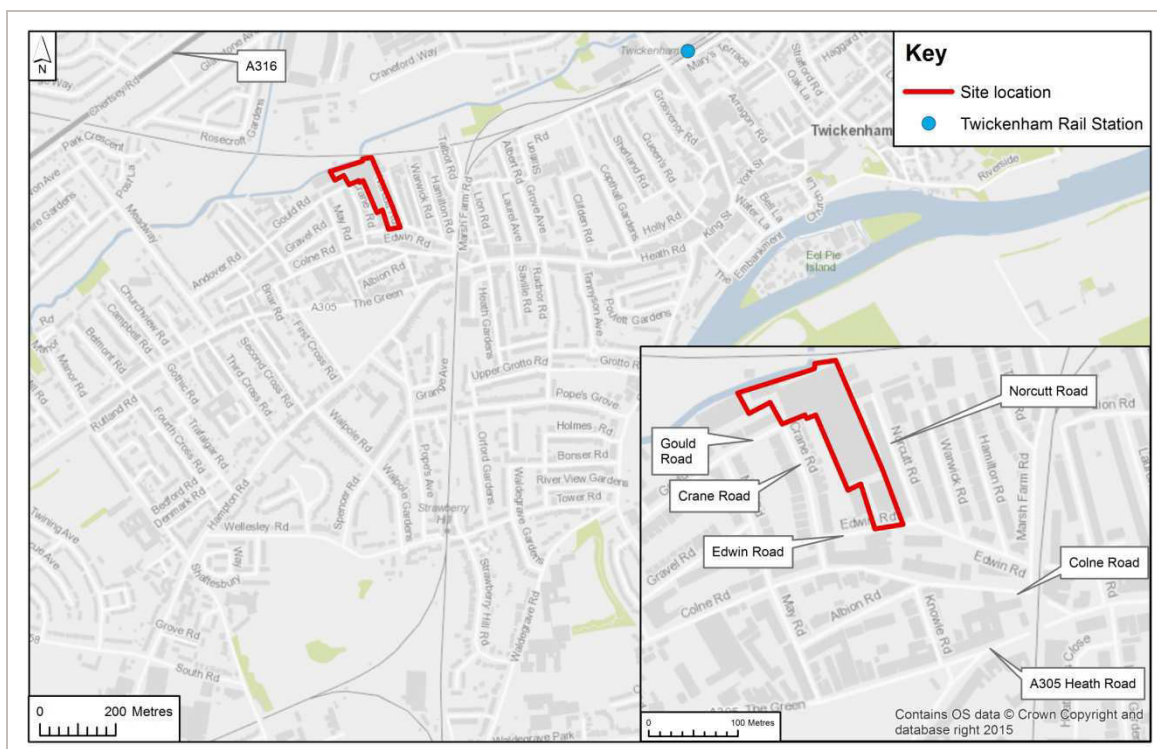
#### INTRODUCTION

- 3.1 This section of the TS describes the existing or baseline transport conditions at the existing site and in the surrounding area. The baseline conditions need to be established to fully understand the context of the proposed change of use and the associated traffic and transport impacts.

#### SITE LOCATION AND LOCAL HIGHWAY NETWORK

- 3.2 This section will review the local roads on the local highway network identified as key to the Greggs operations in Twickenham.
- 3.3 The site is bounded by Edwin Road to the south, the existing residential streets of Crane Road and Norcutt Road to the west and east, respectively, and the River Crane and railway lines to the north. The site is accessed via two simple priority junctions; one at the intersection of Gould Road and Crane Road, and the other on Edwin Road.
- 3.4 The site's location in the context of the wider local highway network is shown in Figure 3.1.

**Figure 3.1: Site location and local highway network**



- 3.5 The site is currently used as a production facility for Greggs Bakery and has two vehicular accesses; one on Edwin Road and the other on Gould Road. The site access on Edwin Road is approximately 7.7m wide and takes the form of a priority junction, as shown in
- 3.6 Figure 3.2. This access is the primary point of access to the site for heavy goods vehicles (HGVs) and bakery deliveries. The access on Gould Road, shown in Figure 3.3, is a priority junction at the point where Gould Road and Crane Road meet, and serves as the primary access for cars and office related

deliveries by light goods vehicles (LGVs). The access is approximately 5.0m wide. Good visibility can be achieved from both of the accesses in each direction. However, it should be noted that cars parked too close to the junctions can cause a reduction in the visibility achievable.

**Figure 3.2: Site access on Edwin Road**



**Figure 3.3: Site access on Gould Road at its intersection with Crane Road**



- 3.7 Both Gould Road and Crane Road are quiet Victorian terraced residential streets, which both have a carriageway width of approximately 7.2m. The roads experience on-street parking on both sides of the carriageway resulting in vehicles in only one direction being able to use the road at once due to it having a usable width of approximately 3.4m. As the road is not a major through-route for traffic this does not



appear to cause significant issues with congestion. The road is not part of a Controlled Parking Zone (CPZ) although there are double yellow lines on both sides of the carriageway where both roads meet in the vicinity of the site access. Figure 3.4 and Figure 3.5 show the existing situation on Gould Road and Crane Road, respectively.

**Figure 3.4: On-street parking on Gould Road**



**Figure 3.5: On-street parking on Crane Road**



- 3.8 Approximately 140m to the south of the site access on Gould Road, Edwin Road forms a priority T-junction with Crane Road, as shown on Figure 3.6. Cars park opposite the junction reducing the available space that larger vehicles may need to complete the turn. The junction is located approximately 65m to the west of the site access on Edwin Road and has a sign stating that it is 'Unsuitable for HGVs'.

**Figure 3.6: Priority T-junction of Edwin Road and Crane Road**

- 3.9 The western end of Edwin Road is characterised by the industrial use of the Greggs Bakery and light industrial land uses associated with a number of vehicle maintenance garages. In the vicinity of the site access, the road has a carriageway width of approximately 7.1m. There are double yellow lines painted on the northern side of the carriageway along the frontage of the bakery and the neighbouring garage, and on the southern side along the frontage of the three vehicle maintenance garages. Elsewhere there are no restrictions and as a result the road experiences significant un-restricted on-street parking. To the west of the Greggs access, parked cars are solely on the carriageway but to the east, cars on the northern side of the carriageway were observed parking partially on the footway, as shown in Figure 3.7. This is likely to be a result of drivers trying to reduce the potential for conflict with HGVs accessing the Greggs site. Despite some restrictions, cars are still able to park to within approximately 4.0m of the access on the northern side of the carriageway, creating the potential for conflict with HGVs accessing and egressing from the site.

**Figure 3.7: On-street parking on Edwin Road**

- 3.10 To the east of Norcutt Road, Edwin Road is predominantly residential, with a mixture of flats and houses, and has a carriageway width of approximately 7.5m. Similarly to the surrounding roads, this section of Edwin Road experiences significant on-street parking on both sides of the carriageway, resulting in a useable carriageway width of approximately 3.7m which is sufficient for one vehicle to pass despite the road allowing two-directional traffic.
- 3.11 At its far eastern end, Edwin Road becomes Marsh Farm Road before forming a priority T-junction with Colne Road. Marsh Farm Road is a two-directional road and has a carriageway width of 4.6m with



double yellow lines on both sides of the carriageway. The transition from Edwin Road to Marsh Farm Road comprises an almost 90° blind bend which as shown in Figure 3.8 is not suitable for frequent HGV use due to its narrow nature which requires HGVs to use the entire width of the carriageway and partially mount the kerb to make the manoeuvre.

**Figure 3.8: HGV negotiating corner between Marsh Farm Road and Edwin Road**



- 3.12 The junction of Marsh Farm Road and Colne Road comprises a minor priority T-junction to the west of a railway bridge with a height restriction of 13'6", as shown in Figure 3.9. In the vicinity of the junction, Colne Road has a carriageway width of approximately 5.1m. Due to the confined nature of the junction and the narrow width of both roads, vehicles turning into Marsh Farm Road from Colne Road occupy both lanes while making the manoeuvre presenting a risk to other oncoming vehicles. It should also be noted that the visibility to the east of the junction is restricted due to obstruction caused by the railway bridge, as shown in Figure 3.10. This causes significant risk of conflicts between other road users and HGVs.

**Figure 3.9: Height restriction for bridge on Colne Road**



**Figure 3.10: Junction of Marsh Farm Road / Colne Road**



- 3.13 The priority T-junction of Colne Road and Heath Road is the point of access for HGVs from the wider highway network to the residential streets that provide access to the Greggs facility. Due to its priority nature, large vehicles turning right into or out of the junction may experience delays at peak times due to heavy traffic flows and needing to wait for gaps to manoeuvre. The junction is shown in Figure 3.11.

**Figure 3.11: Junction of Colne Road / A305 Heath Road**



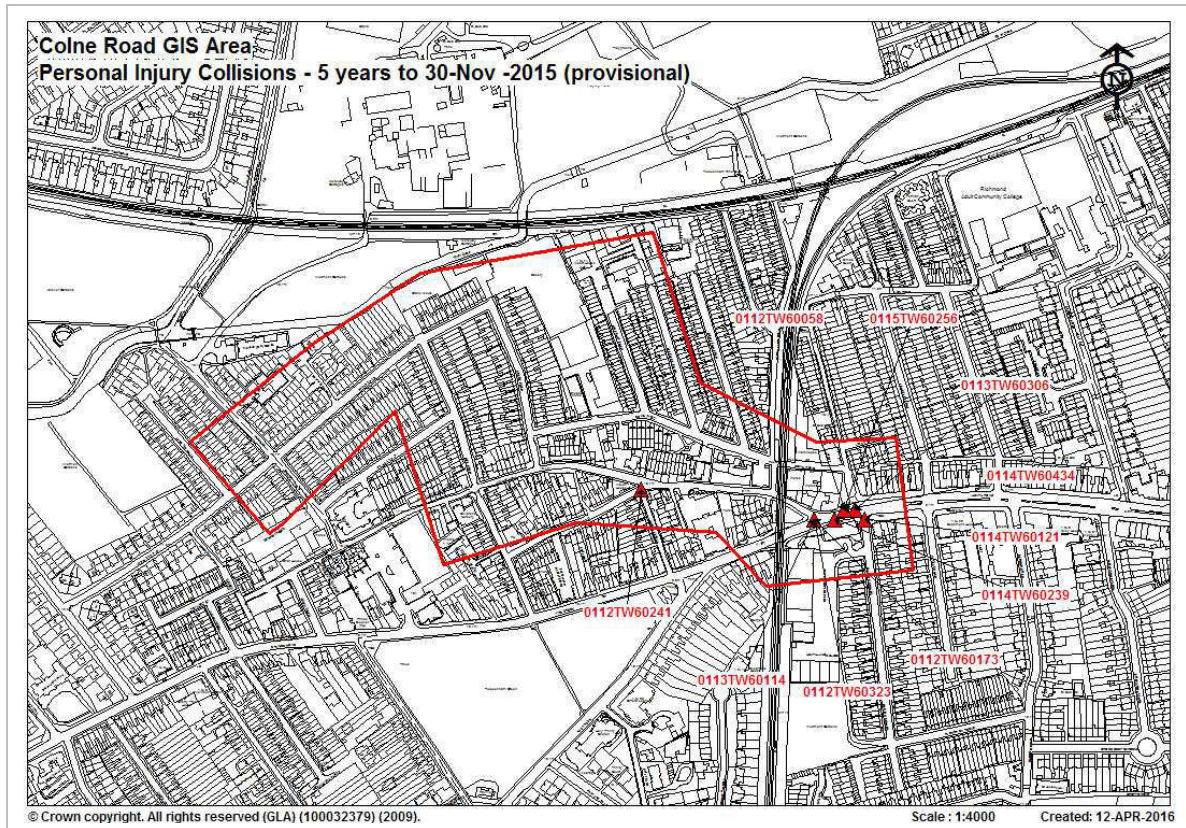
- 3.14 The on-street parking issues experienced on the roads in the vicinity of the site are a result of a number of factors in the local area. Most of the residential areas were designed in the Victoria era when cars were not commonplace. Therefore the roads are designed to be narrow and the dwellings do not have dedicated parking facilities, requiring residents to park on the road. The issue is compounded by the employment uses of Greggs and the vehicle maintenance garages, having insufficient parking capacity to cope with the demand from employees, visitors and customers. As such, additional on-street parking demand is generated by these uses. Due to the site's proximity to Twickenham Rail Station, there is also the potential that rail users are taking advantage of the unrestricted parking available on the road.
- 3.15 Vehicles travelling to and from the local and strategic road network to the site would route along the series of residential roads described above. These roads are aligned through residential areas and have housing fronting onto both sides of the carriageway along much of their lengths. These routes are unsuitable for high volumes of HGVs due to the detrimental impacts on residents in terms of noise, air quality and safety.

## COLLISION ANALYSIS

- 3.16 Personal Injury Accident Data (PIA) has been obtained from Transport for London (TfL) for the latest available five year period, covering the area surrounding the Greggs Bakery site. The study area includes Crane Road, May Road, Norcutt Road, Warwick Road, Edwin Road, Colne Road between Heath Road and May Road, the Heath Road crossroads with Lion Road and Heath Gardens and Gould Road between Crane Road and Mereway Road. The study area and full data output is included at Appendix B and the locations of the incidents are shown on Figure 3.12.



Figure 3.12: Map showing location of Personal Injury Accidents (PIA)



Source: Transport for London

- 3.17 A total of 10 injury accidents were recorded in the study area within the most recent available five year period (December 2010 to November 2015). Of the 10 injury accidents there was one serious injury accident and nine slight injury accidents. No fatal accidents were recorded in the vicinity of the site within the most recent five year period. Of the injury accidents five involved pedal cycles, three involved motorcycles, two involved pedestrians and two involved goods vehicles (>3.5 tonnes).
- 3.18 The serious injury accident took place on Heath Road close to its junction with Heath Gardens and involved a cyclist being struck by the door of a heavy goods vehicle (>7.5 tonnes).
- 3.19 A cluster of six injury accidents took place at the Heath Road crossroads with Lion Road and Heath Gardens. Of the six injury accidents, four involved motorcycles or pedal cycles being struck by vehicles turning right. The remaining two were the result of a pedestrian being struck by a vehicle and a pedal cycle being struck by the door of an HGV (detailed above). Each of the accidents involving vehicles turning right and colliding with pedal cycles or motorcycles at the junction are considered to be a result of driver / rider error, rather than as a result of a defect in the highway given the straight and well lit nature of the area.
- 3.20 A total of two injury accidents took place at the Colne Road junction with Heath Road. The first injury accident at this junction involved a medium sized goods vehicle (3.5-7.5 tonnes) turning left across the path of a cyclist, resulting in the cyclist falling off. The second injury accident at this junction involved a vehicle turning right as a motorcycle was overtaking.
- 3.21 An analysis of the injury accidents that occurred within the study area suggests that there are no common contributory factors to the injury accidents that occurred during the most recent five year study period. It is therefore considered that there are no existing road safety issues in the vicinity of the site that would be exacerbated as a result of the proposed redevelopment.

## PEDESTRIAN AND CYCLIST FACILITIES

- 3.22 To enable an assessment of the viability of walking between the site and key destinations in the local area it is appropriate to establish the maximum distance that people are generally prepared to walk and the destinations that exist within these distances.
- 3.23 The Institute of Highways and Transportation's (IHT's) guidance, Guidelines for Providing for Journeys on Foot (2000) states in paragraph 3.32 and Table 3.2 that the preferred maximum walking distance to facilities and local services is circa two kilometres. The distances for various land uses, are summarised in Table 3.1.

**Table 3.1: Suggested acceptable walking distances**

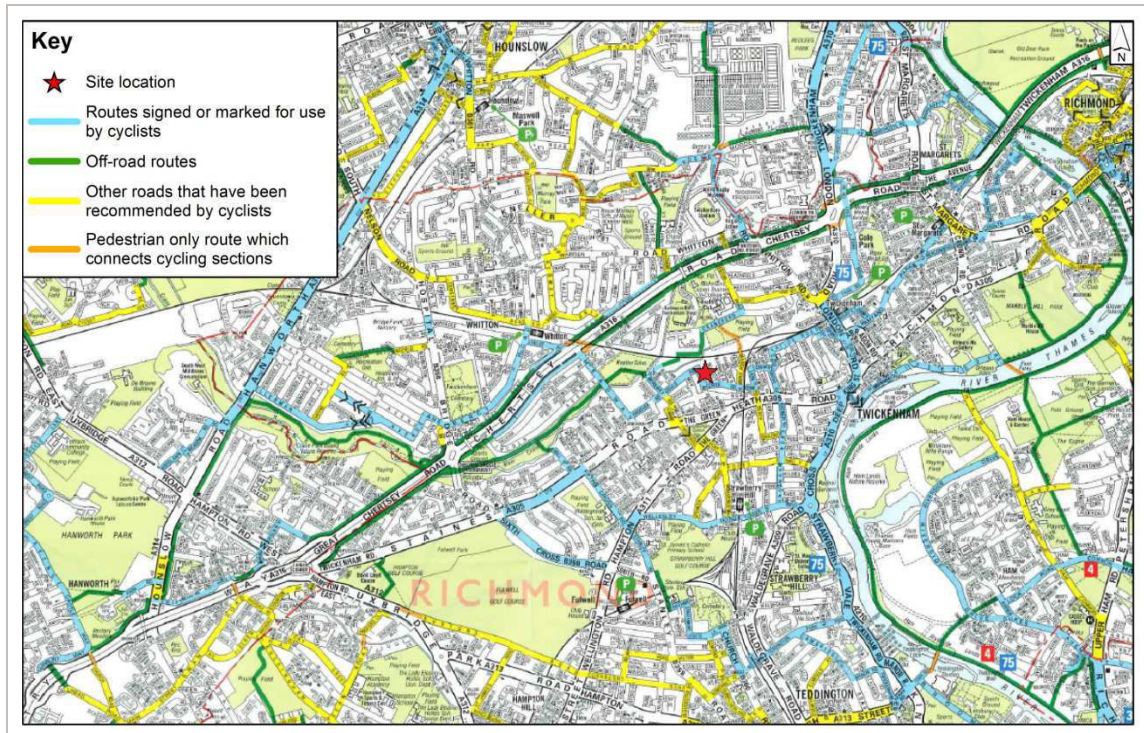
Definition	Town centres	Commuting / schools	Elsewhere
Desirable	200m	500m	400m
Acceptable	400m	1,000m	800m
Preferred	800m	2,000m	1,200m

*Source: Providing for Journeys on Foot (IHT, 2000)*

- 3.24 The area in the vicinity of the site has good pedestrian facilities with well-established lit footways which provide access to a wide range of local community, education, health, retail and employment facilities. The footways are approximately 1.8m wide, however it should be noted that on Edwin Road the northern footway is slightly narrower due to cars parking partially on the footway.
- 3.25 Cycling is considered an important mode of sustainable travel and is generally considered suitable for distances of up to 3 miles (4.8km) for regular journeys in urban areas, and 5 miles (8km) for commuting journeys (source: LTN 2/08, Cycle Infrastructure Design).
- 3.26 Transport for London (TfL) accessibility guidance assumes that, on average, cyclists travel at a speed of 14.4 kilometres per hour (9 miles per hour); this equates to a cycling speed of 240 metres per minute. On this basis it can be considered that any destination under 2.5 kilometres is within approximately a 10 minute cycle ride of the redevelopment site.
- 3.27 The site benefits from numerous formalised and recommended routes within close vicinity. Routes around the site are illustrated within Local Cycling Guide 9 (2015) produced by TfL for the area surrounding the site including Hounslow, Heathrow, Feltham, Twickenham, Wandsworth, Richmond, Kingston, Surbiton and Wimbledon. The cycle guide has been reproduced for the area surrounding the site in Figure 3.13.



Figure 3.13: Local cycle network



Source: Transport for London

- 3.28 Locally there are continuous light blue or yellow ('signed' or 'TfL recommended') cycle routes on Gould Road, Crane Road, Edwin Road, Lion Road, Station Road, Andover Road and Meadway. The key off-road (green) route along the A316 towards Central London can be accessed via a link crossing the river to the north of Marsh Farm Road, or via a link north of Gould Road. Together these provide connections to various residential areas and amenities as well as a public transport interchange at Twickenham.
- 3.29 The level of accessibility at the site to formal cycle facilities and the number of services, residential areas and public transport interchanges that can be reached within a reasonable cycle distance ensure that cycling is a viable mode to and from the site and can readily form part of a multi-modal trip. The local topography is not considered to impede travel by walking or cycling in the local area.

## PUBLIC TRANSPORT NETWORK

### Public Transport Accessibility Level (PTAL)

- 3.30 The PTAL assessment is a detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability. This provides a method of measuring the density of the public transport network at any location within Greater London. This method has been agreed by the London Borough-led PTAL development group as the most appropriate for use across London, and is set out in the TfL document Measuring Public Transport Accessibility Levels published in April 2010.
- 3.31 PTAL considers the walking time to public transport access points, the reliability of the service modes available, the number of services available within the catchment, and the level of service (i.e. average waiting time). The PTAL is categorised in 6 levels, where 6 represents a high level of accessibility and 1 a low level of accessibility.

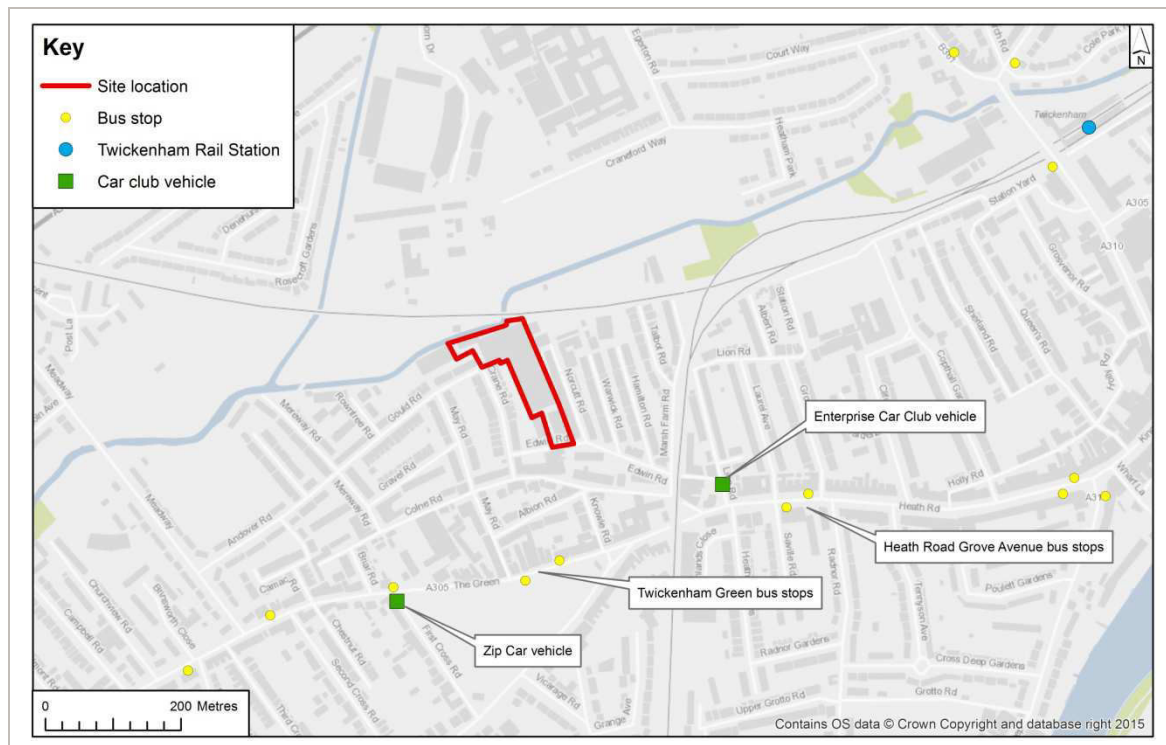


- 3.32 The PTAL of the proposed redevelopment site has been calculated using the TfL tool WebCAT. The database indicates that the site has a PTAL of 2, which represents a 'poor' level of accessibility to public transport. The PTAL report is provided at Appendix C.
- 3.33 The PTAL score does not take into consideration the location of the redevelopment site adjacent to good walking and cycling links or its proximity to a number of services, amenities or residential areas within Twickenham. A range of key destinations can be accessed by a number of travel modes providing potential site users with a real and genuine choice of travel modes without needing to rely on the private car.

### Local bus connections

- 3.34 The proposed redevelopment site lies within close proximity to good existing public transport routes. PTAL guidance considers that people are willing to walk up to eight minutes in order to access bus stop infrastructure. It also assumes that, on average, pedestrians will walk at a speed of 4.8 kilometres per hour (3 miles per hour) whilst travelling to a bus stop. This equates to a walking speed of 80 metres per minute. Thus, TfL consider that bus stops within 640 metres of a development (80 metres x 8 minutes) are considered to be accessible.
- 3.35 As shown on Figure 3.14, the closest bus stops to the site are the Twickenham Green stops approximately 450m to the south of the site and the Heath Road Grove Avenue stops, approximately 550m to the southeast of the site. The Heath Road Grove Avenue stops and the westbound stop at Twickenham Green include shelters, seating and timetable information. The northbound stop at Twickenham Green has timetable information.

Figure 3.14: Sustainable transport network



- 3.36 The services from these stops offer a minimum daytime combined frequency of 37 buses every hour, providing frequent and direct connections with various locations in London including Isleworth, Hammersmith, Kingston, Fulwell, Hounslow, Staines, Richmond and Heathrow. The stops are also served by a night bus service (N22) between Piccadilly Circus and Fulwell which has a frequency of

every 30 minutes. A summary of the bus services which stop at the Twickenham Green and Heath Road Grove Avenue stops is provided in Table 3.2. The table also highlights which stops can be used to access Twickenham Rail Station.

- 3.37 The level of accessibility to frequent bus services to a wide range of locations and destinations ensures that travel to and from the site by bus is a viable mode and can readily form part of a multi-modal trip involving National Rail.

**Table 3.2: Summary of bus services**

No.	Route	Stops served	Approx. frequency	Serves Twickenham Rail Station?
110	Arragon Road – West Middlesex Hospital	Twickenham Green, Heath Road Grove Avenue	Every 20 minutes	✗
267	Hammersmith Bus Station – Fulwell Bus Garage	Heath Road Grove Avenue	Every 8-12 minutes	✓
281	Tolworth Tower – Hounslow Bus Station	Heath Road Grove Avenue	Every 7-9 minutes	✓
290	Arragon Road – Staines Bus Station	Heath Road Grove Avenue	Every 20 minutes	✗
490	Pools on The Park – Heathrow Terminal 5	Twickenham Green, Heath Road Grove Avenue	Every 8-13 minutes	✗
H22	The Bell - Manor Road	Twickenham Green, Heath Road Grove Avenue	Every 10-13 minutes	✗
N22	South Road / Fulwell – Piccadilly Circus	Heath Road Grove Avenue	Night bus – every 30 minutes	✗
R70	Nurserylands Shopping Centre – Richmond / Manor Road	Heath Road Grove Avenue	Every 9-11 minutes	✗

Source: Transport for London (13/04/2016)

### National Rail connections

- 3.38 As shown on Figure 3.14, Twickenham National Rail Station is located approximately 1.2km east of the site. National Rail services operated by South West Trains provide connections from London Waterloo to Reading, Windsor and the Kingston and Hounslow Loop Lines. The station can be accessed within a 15 minute walk, a five minute cycle or a five minute bus ride using either the 267 or 281 services.
- 3.39 A summary of key National Rail services from Twickenham Rail Station is provided in Table 3.3.

**Table 3.3: Summary of rail services from Twickenham Rail Station**

Destination	Approx. journey time	Frequency
Richmond upon Thames	5 minutes	12 in the AM peak and 11 returning in the PM
Clapham Junction	15 minutes	17 in the AM peak and 16 returning in the PM
Kingston	13 minutes	17 in the AM peak and 16 returning in the PM
London Waterloo	30 minutes	3 in the AM peak and 2 returning in the PM

Source: National Rail (13/04/2016)

## CAR CLUBS

- 3.40 In the coming years, London faces challenges of population growth, congestion and the environment. Car clubs provide a cost-effective and flexible alternative to owning a car, and can help tackle these challenges. Car clubs provide the convenience of owning a car without the hassle or costs of repairs, servicing or parking. Members can book cars locally for just an hour, up to a whole weekend, or longer. They reduce the need for people to own their own cars by providing access to conveniently located, high-quality vehicles on an affordable 'pay-as-you drive' basis.
- 3.41 The nearest existing car club, is Enterprise Car Club ([www.enterpriseclub.co.uk](http://www.enterpriseclub.co.uk)) which has a car approximately 375m east of the site on Lion Road. There is an additional car club space on First Cross Road, operated by Zip Car ([www.zipcar.co.uk](http://www.zipcar.co.uk)) approximately 550m southwest of the site. The locations of the car clubs in the vicinity of the site are shown on Figure 3.14.

## EXISTING MODAL SHARE

- 3.42 The site is located within the two Mid-level Super Output Area of E02000799 and E02000797, which have been used as a proxy to determine how residents in the local area travel to work. Table 3.4 shows how the existing residents of this area currently travel to work, as obtained from 2011 Census Journey to Work data.

**Table 3.4: Residents' Method of Travel to Work (MSOA E02000799 and E02000797)**

Mode	Percent
Underground	6
Train	34
Bus	8
Taxi	0
Motorcycle	1
Car Driver	32
Car Passenger	1
Bicycle	7
On Foot	11
Other	0
<b>TOTAL</b>	<b>100%</b>

- 3.43 The data shows that 48% of residents in the local area use public transport to travel to work with the train (34%) and bus (8%) being the most popular modes, followed by the Underground (6%). Sustainable modes such as walking (7%) and cycling (11%) make up nearly a fifth of all trips. Only 32% of residents travel to work by private car, with an additional 1% car sharing. The remainder of people travel by taxi (1%), motorcycle (1%) or other (<1%) modes. Table 3.5 shows how people who are employed within the MSOAs of E02000799 and E02000797 travel to work, as calculated using 2011 Census Journey to Work data.

**Table 3.5: Employees' Method of Travel to Work (MSOA E02000799 and E02000797)**

Mode	Percent
Underground	4
Train	16
Bus	16
Taxi	0
Motorcycle	1
Car Driver	41
Car Passenger	2
Bicycle	7
On Foot	12
Other	1
<b>TOTAL</b>	<b>100%</b>

- 3.44 The data shows that 36% of people employed in the MSOAs analysed use public transport to travel to work with the train (16%) and bus (16%) being the most popular modes, followed by the Underground (4%). Sustainable modes such as walking (12%) and cycling (7%) make up nearly a fifth of all trips. Approximately 41% of employees travel to work by private car, with an additional 2% car sharing. The remainder of employees travel by motorcycle (1%), taxi (<1%) or other modes (1%).
- 3.45 It is therefore considered that the modal split shows a large proportion of local residents currently travel to work by sustainable means (68%). This is considered to reflect the availability of local public transport facilities.

## SUMMARY

- 3.46 This section has evaluated the existing transport and highway conditions in the vicinity of the site and shown that:
- The site is in a sustainable and accessible location with strong connections by foot, cycle and public transport connecting the area to a variety of local facilities and amenities;
  - The site is located just over a five minute walk from a number of bus services and within a 15 minute walk of Twickenham National Rail Station, connecting it to the wider London area;
  - The PIA data analysis identified no pattern of accidents in the vicinity of the site that suggests that there are no existing road safety issues in the vicinity of the site that would be exacerbated as a result of the proposed redevelopment;
  - The area surrounding the site is predominantly residential with a significant amount of on-street parking due to the lack of off-street parking provision resulting from the area's development in an era of low car prevalence; and
  - The highway network surrounding the site is characterised by narrow carriageways and tight junction radii typical of Victorian streets and the usable carriageway width of the Edwin Road, Colne Road and Crane Road is not suitable for frequent HGV movements.

## 4 Existing Site

### INTRODUCTION

- 4.1 This section summarises the existing and permitted use of the site, providing details of its operations and access arrangements.

### EXISTING SITE USE AND PERMITTED USE

- 4.2 The site is located to the northeast of the centre of Twickenham in West London and has two access points to the highway network; via Gould Road and Edwin Road. The site is bounded to the north by the River Crane and the railway line, to the east and west by residential areas, and to the south by Edwin Road which is currently characterised by residential and light industrial uses. A plan showing the location of the site in relation to the surrounding area is included as **Error! Reference source not found.**
- 4.3 The site currently comprises three buildings which house production facilities for Greggs, but is surplus to requirements and therefore is due to be closed. The site is currently used as industrial land and therefore while not suitable as a modern industrial site, could be occupied by industrial uses in the future should the proposed redevelopment not proceed.
- 4.4 The site has many of the typical characteristics of a Victorian factory, having expanded over time to the full capability of the original site and is now constrained for further expansion and the existing operations.

### EMPLOYEES

- 4.5 The Greggs site currently employs 225 staff in total including factory staff and administration / management staff. The factory employees work across five different shifts covering a 24 hour period seven days a week and therefore the full workforce is never on-site at the same time. Table 4.1 below details the bakery's current shifts and the number of staff on average working at each time.

**Table 4.1: Summary of Greggs Bakery shifts and employees**

Shift	Number of employees working
06:30 – 15:30	43
07:00 – 16:00	32
14:00 – 23:00	15
15:30 – 00:30	22
00:00 – 09:00	15

- 4.6 In addition to the bakery's factory staff, there is an administration and management team who work general office hours within the range of 07:00-18:00. The number of management / admin staff on-site varies but averages approximately 20 per day.

### CAR AND CYCLE PARKING

- 4.7 The car and cycle parking on-site can be accessed from the Gould Road entrance. There are 25 marked car parking spaces, however typically an additional extra 10 vehicles are parked informally on-site by blocking other cars in. There is a sheltered cycle storage area on-site which has the capacity for 18 cycles.

- 4.8 Information provided by the client suggests that employees frequently park their cars on the surrounding residential streets due to the limited number of spaces provided on-site. This is most common for employees who work on the afternoon and evening shifts and arrive when the day shift is still on-site.
- 4.9 The dissatisfaction of local residents with Gregg's employees parking on the surrounding streets is an issue that has been highlighted in local news stories in addition to ongoing issues with litter and congestion<sup>1</sup>.

## DELIVERIES AND SERVICING

### Frequency

- 4.10 The access on Edwin Road serves as the primary access for HGVs and deliveries for the factory. Greggs receives approximately 20 deliveries on average each weekday and five deliveries each day on a weekend, all of which are undertaken by HGV. The first five deliveries of each day take place before 07:00, and the remaining deliveries on weekday all take place in the morning where possible. The site can accommodate approximately five HGVs at a time and vehicles are required to reverse into the site access from Edwin Road.
- 4.11 The site receives approximately five deliveries of office goods and materials each day via the Gould Road access. These deliveries are made by couriers in LGVs.

### Vehicle routing

- 4.12 All Greggs drivers and companies who deliver to the site are provided with a site access plan and instructions for accessing the site using the local highway network. The instructions provided to delivery drivers are to access the site via the A305, Colne Road and Edwin Road. Drivers are requested not to follow vehicle navigation systems as these may lead them along a different route.

### Congestion

- 4.13 A local news article<sup>2</sup> published in February 2012 reported that a Greggs delivery vehicle had been attacked at the site with a number of items thrown at the vehicle. The attack was linked to ongoing frustration from residents about the disruption caused by the bakery and its operations. The article states that neighbours have complained about the noise and congestion caused by HGVs parking along Edwin Road while they wait to access the site. It reports that a local resident stated that the busiest times for deliveries are at midnight, 02:00 and 05:00, which generate a significant disruption for residents.
- 4.14 JMP undertook a site visit on Tuesday 29<sup>th</sup> March 2016 and witnessed the disruption caused by frequent HGV deliveries to the bakery. At the time of the visit three vehicles were waiting to access the site as shown in Figure 4.1. At one point a HGV was exiting the site and due to the narrow nature of Edwin Road, a waiting HGV was required to turn into the residential Norcutt Road to provide the vehicle with enough room to pass. This caused significant disruption to an otherwise quiet residential area as shown on Figure 4.2.

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<sup>1</sup> [http://www.richmondandtwickenhamtimes.co.uk/news/9553609.Bunfight\\_breaks\\_out\\_over\\_Greggs\\_the\\_baker/](http://www.richmondandtwickenhamtimes.co.uk/news/9553609.Bunfight_breaks_out_over_Greggs_the_baker/)

<sup>2</sup> as above



**Figure 4.1: HGVs waiting to access the bakery via Edwin Road and blocking the carriageway**



**Figure 4.2: HGV turning in Norcutt Road to allow other HGVs to pass**



### Site access

- 4.15 Due to the on-street parking and the proximity of the site access on Edwin Road to the main carriageway, HGVs are often not able to turn into the site. Due to its confined nature, HGVs are not able to turn around inside the site and therefore are required to reverse into the access from Edwin Road. This presents a significant risk and can conflict with other road users, including the cars parked or waiting directly outside the access, cyclists and pedestrians. These manoeuvres are highly disruptive to the surrounding residential area causing congestion and delays to road users and pedestrians on Edwin Road and the surrounding residential roads that feed onto it.
- 4.16 The Freight Transport Association (FTA) design guidance 'Designing for deliveries' (2006) states that two-way access roads should be 'sufficient to accommodate the swept paths of two vehicles passing in opposite directions' with safety margins between the two vehicles and any vertical obstruction close to the carriageway edge. The document states that the total 'minimum' width of most existing two-way

straight sections of access roads is 7.3m based upon a standard vehicle width of 2.5m. On right-angled bends, such as that between Edwin Road and Marsh Farm Road, the document recommends that at the apex of the bend there is a carriageway width of 12.9m with a radius of 15m.

- 4.17 The useable carriageway width on Edwin Road is 3.3m due to on-street parking, which is below this FTA guideline and therefore indicates the likelihood of conflicts between HGVs and parked cars. The reduced useable carriageway width due to restricted space and parked cars, particularly in the vicinity of junctions and bends such as that between Edwin Road and Marsh Farm Road, and the site access on Edwin Road, makes access to industrial premises difficult, particularly for HGVs.
- 4.18 Swept path analysis has been undertaken for the area around the Edwin Road access for an articulated vehicle (16.5m) and a rigid truck, both with and without the on-street parking. These assessments represent a 'best case' scenario for access to the site by HGVs. Due to the narrow residential streets and confined access, HGVs are currently not permitted to access the site using the Gould Road access. However, swept path analysis has been undertaken for the access and the route between the site and Heath Road, the main road, to highlight its unsuitability for HGV access.
- 4.19 As shown on JMP Drawings ST17096-01 and ST17096-02 included in Appendix D, both the articulated and rigid vehicles experience difficulties at the junction of Colne Road / Marsh Farm Road and Edwin Road / Marsh Farm Road due to tight junction and corner radii which causes the vehicles to overshoot the kerblines and mount the kerb to make the manoeuvre. As shown on the drawings, the vehicles occupy almost all of the useable carriageway on Edwin Road, leaving little margin for error before potentially conflicting with parked cars.
- 4.20 Vehicles are required to reverse into the site, which as shown on Drawing ST17096-01 cannot be completed without the articulated vehicle going over the kerblines to complete the manoeuvre. In the event that cars are parked too close to the junction it is likely that the HGVs would be unable to complete the manoeuvre without clashing with parked cars. When egressing from the site, the articulated vehicle cannot do so without going over the kerblines and has little space to straighten up before reaching the parked cars on the southern side of the carriageway. As such, if cars were illegally parked or pulled over on the yellow lines there would inevitably be conflicts with HGVs accessing the site.
- 4.21 The existing site is not considered appropriate for future development as a modern industrial site due to restricted HGV access as a result of significant levels of on-street parking on Edwin Road, Gould Road and Crane Road. As such redevelopment for industrial-related employment purposes will present a highway safety issue due to the current substandard access for HGVs.

## SUMMARY

- 4.22 This section has provided a summary of the site's existing and permitted use and details of the existing site's operations, showing that:
- The site is surplus to Greggs' requirements and is therefore due to be closed;
  - The site is currently used as industrial land and therefore while not suitable as a modern industrial site, such uses could continue if the site is not redeveloped;
  - The site currently employs 225 staff in total, including factory and administrative / management staff. Factory staff work five shifts spread across the whole 24 hour period seven days a week and administrative / management staff work between 07:00-18:00;
  - The facility services approximately 25 deliveries and collections per day, including 20 for the factory goods in the morning via Edwin Road by HGVs and five containing office supplies via Gould Road via LGVs;

- The HGV traffic generated by the factory cause significant disruption to the surrounding residential areas, including noise and traffic congestion along Edwin Road while the vehicles wait to access the site; and
- The route taken by HGVs between Heath Road and the site is not suitable for frequent HGV use due to the narrow useable width of the carriageway and the narrow nature of junctions and corners along the route. Swept path analysis has shown that HGVs can only manoeuvre between Edwin Road and Colne Road by mounting the kerb due to the space constraints on the existing highway.

## 5 Redevelopment Proposals

### INTRODUCTION

- 5.1 This chapter of the TS considered the proposed redevelopment in terms of scale, land use, the site's access arrangements and car and cycle parking.

### PROPOSED REDEVELOPMENT

- 5.2 The proposed redevelopment will replace the existing Greggs Bakery production facilities and ancillary office space with 96 residential units and 2,757m<sup>2</sup> of commercial start-up space. The residential units are proposed to be a mixture of apartments, townhouses and mews houses. A full breakdown by residential unit size and type is provided in Table 5.1 below and the development masterplan is included in Appendix A.

**Table 5.1: Summary of residential development quantum**

Type of dwelling	Number of bedrooms	Quantity provided
Flat	1 bedroom	9
	2 bedrooms	52
Mews house	2 bedrooms	2
Townhouse	3 bedrooms	15
	4 bedrooms	18
<b>Total</b>	<b>-</b>	<b>96</b>

- 5.3 The apartments are proposed to be spread across three separate buildings, the largest of which (Block C) would be six storeys and located in the northeastern corner of the site. Two smaller blocks, one with two storeys (Block B) and the other with three storeys (Block A), would be situated in the southeastern and southwestern corners of the site, off Edwin Road. A new residential street would connect the northern and southern blocks of flats, along which the three and four storey townhouses and mews houses would be arranged.
- 5.4 The commercial start-up space is proposed to be located in the northwestern corner of the site, off Gould Road, and would be between three and four storeys high.

### ACCESS ARRANGEMENTS

- 5.5 The existing vehicular access at the point where Gould Road and Crane road meet would be retained and would become the primary point of access for the commercial start-up space. The access would take the form of a simple priority T-junction.
- 5.6 The principle of obtaining access from Edwin Road would be retained; however the proposed priority T-junction would be located slightly to the east of the existing access to the bakery. This access would be the primary point of access for the residential element of the scheme.
- 5.7 As shown on the development masterplan included in Appendix A, the priority T-junctions on Gould Road and Edwin Road would be linked by an internal road which provides access to the all elements of the scheme.

- 5.8 It should be noted that both the internal road and access junctions will be designed in accordance with the principles in Manual for Streets (2007) and will ensure that suitable visibility is achieved and that pedestrian and cycle movements are fully considered.
- 5.9 Pedestrian and cycle access will be provided at both the Gould Road and Edwin Road accesses with a footway provided on the western side of the Edwin Road access and on the eastern side of the Gould Road access. Footways will be provided on both sides of the internal road network and pedestrian and cycle movement will be prioritised through the design process.

## PARKING PROVISION

- 5.10 Each residential unit on site will have allocated car parking which will be in line with the parking standards included in the London Plan and LBRuT DMP for residential development. Apartment blocks A and B will have spaces allocated which are external to the buildings, while Block C will have one storey of undercroft parking provided below the apartment block. The houses will provide allocated parking through a mixture of driveway spaces and garages.
- 5.11 The commercial start-up units will have undercroft parking below the three-storey section of the building. This will be provided in line with the LBRuT and London Plan standards as set out in Chapter 2.

## SUMMARY

- 5.12 This chapter has summarised the redevelopment proposals for the Greggs site in Twickenham and shown that the proposals comprise:
- The development of 96 residential units and 2,757m<sup>2</sup> of commercial start-up space;
  - The retention of the Gould Road vehicular access and the principle of accessing the site via Edwin Road, and the provision of an internal road connecting the two accesses;
  - Pedestrian and cycle accesses via both Gould Road and Edwin Road, and the prioritisation of pedestrian and cycle movement throughout the site; and
  - Car and cycle parking in line with the London Plan, including the provision of undercroft parking for the commercial space and for one of the three apartment blocks.

## 6 Multi-modal Trip Generation

### INTRODUCTION

- 6.1 This chapter of the TS provides an overview of the trip generation and potential travel patterns that are anticipated to occur as a result of the proposed redevelopment. Consideration is given to trips associated with the site's existing operation, its permitted use and its proposed future use.

### EXISTING SITE

- 6.2 As the site is currently still in operation, staff and delivery trip information has been obtained from the Greggs Bakery Manager. Using the information provided about staff shifts, employee numbers and delivery patterns (summarised in Chapter 4), first principles were used to estimate the number of trips in the AM peak (08:00-09:00), PM peak (17:00-18:00) and across a 12 hour period between 07:00-19:00 for cars/LGVs and HGVs. The following assumptions were made based upon the information provided:
- 50% of office staff work 09:00-18:00, 25% of office staff work 07:00-16:00 and 25% of office staff work 08:00-17:00;
  - 41% of factory and office / admin staff drive to the site based upon Census 2011 Journey to Work data for the Twickenham MSOAs in which the site is located (E02000799 and E02000797);
  - Edwin Road HGV deliveries – five before 07:00, and the remaining 15 spread evenly between 07:00-11:00;
  - Gould Road LGV deliveries – three are in the morning and two are in the afternoon; and
  - All deliveries are turned around within the hour.
- 6.3 Due to the difficulty defining more casual and irregular trips generated by the site, such as visitors to the site and staff leaving the site during their breaks, these trips have been excluded from the analysis. It should be noted however that the actual trip generation of the site is likely to be higher than the values calculated due to the omission of these trips.
- 6.4 The estimated trip generation of the site is summarised in Table 6.1.

**Table 6.1: Existing site vehicular trip generation**

Trip type	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Factory based staff (cars)	0	6	6	0	0	0	15	37	52
Office / admin staff (cars)	4	0	4	0	2	2	6	8	14
Non-bakery deliveries (LGVs)	1	1	2	0	0	0	5	5	10
Bakery deliveries (HGVs)	4	4	8	0	0	0	20	20	40
<b>Total cars /</b>	<b>5</b>	<b>7</b>	<b>12</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>26</b>	<b>50</b>	<b>76</b>



Trip type	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
LGVs trips									
Total trips	9	11	20	0	2	2	46	70	116

6.5 The results show that across both peak periods there are 22 total vehicular movements, of which eight are made by HGVs. Across the 12 hour period between 07:00-19:00, there are 116 vehicle movements, of which 40 are made by HGVs.

6.6 Using the total number of car/LGV trips in Table 6.1 and the Census 2011 Journey to Work destination data for the Twickenham MSOAs in which the site is located (E02000799 and E02000797) as a proxy, the multi-modal trip generation of site employees was calculated. The mode shares calculated for the Twickenham MSOAs as a destination are included in Table 3.5 and the multi-modal trip generation is summarised in Table 6.2.

**Table 6.2: Existing site multi-modal trip generation**

Mode	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Car driver	5	7	12	0	2	2	26	50	76
Car passenger	0	0	1	0	0	0	1	2	4
Tube	0	1	1	0	0	0	3	5	7
Train	2	3	5	0	1	1	10	20	30
Bus	2	3	5	0	1	1	10	20	30
Taxi	0	0	0	0	0	0	0	0	0
Motorcycle	0	0	0	0	0	0	1	1	2
Cycle	1	1	2	0	0	0	5	9	13
Walk	1	2	3	0	1	1	8	14	22
Other	0	0	0	0	0	0	0	0	0
Total	11	17	29	0	5	5	64	121	184

## PERMITTED USE

6.7 To determine any future trip generation from the site should it be retained for industrial uses once Greggs Bakery vacates, a trip rate search has been undertaken using the latest available TRICS database (version 7.3.1) using the following parameters:

- 02 Employment – Industrial Unit;
- Located in Greater London;
- Located in a suburban area or edge of town centre area;
- Survey date of 2008 onwards;
- Any weekday; and
- Sites with a GFA up to 6,000m<sup>2</sup>.

6.8 The only comparable industrial site available was a food production facility in Alperton, Brent (site BT-02-C-02), which has been used to calculate the vehicle trip generation for any future industrial use on the site. A summary of the trip rates for cars/LGVs and HGVs is provided in Table 6.3, with the full

TRICS outputs included in Appendix E. This assessment shows the level of trips that could be generated by another occupier within the same use classes as Gregg's current use.

**Table 6.3: Permitted industrial use trip rates**

Trip type		AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
		Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Cars	/	0.115	0.098	0.213	0.147	0.394	0.541	1.969	1.688	3.657
LGVs										
HGVs		0.016	0.049	0.065	0.016	0.000	0.016	0.458	0.473	0.931

- 6.9 Using the trip rates in Table 6.3 and the site's current Gross Floor Area (GFA) of 8,309m<sup>2</sup>, the number of trips estimated to be generated by any permitted future industrial use were calculated and are provided in Table 6.4.

**Table 6.4: Permitted industrial use vehicular trip generation (GFA 8,309m<sup>2</sup>)**

Trip type		AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
		Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Cars	/	10	8	18	12	33	45	164	140	304
LGVs										
HGVs		1	4	5	1	0	1	38	39	77
Total trips		11	12	23	13	33	46	202	179	381

- 6.10 The results show that across both peak periods there would be 69 total vehicular movements, of which two would be made by HGVs. Across the 12 hour period between 07:00-19:00, there would be 381 vehicle movements, of which 77 would be made by HGVs, almost double the number of HGV movements as the existing site.
- 6.11 Using the Census 2011 Journey to Work mode share data for the Twickenham MSOAs as a destination, the multi-modal trip generation for any permitted use of the site was calculated and is summarised in Table 6.5.

**Table 6.5: Permitted industrial use multi-modal trip generation**

Mode	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Car driver	10	8	18	12	33	45	164	140	304
Car passenger	0	0	1	1	2	2	8	7	15
Tube	1	1	2	1	3	4	16	13	29
Train	4	3	7	5	13	18	64	55	119
Bus	4	3	7	5	13	18	64	55	119
Taxi	0	0	0	0	0	0	1	1	1
Motorcycle	0	0	0	0	1	1	4	4	8
Cycle	2	1	3	2	6	8	29	25	53
Walk	3	2	5	3	10	13	47	40	88
Other	0	0	0	0	0	0	1	1	2
Total	24	19	44	29	80	109	398	340	738

## PROPOSED REDEVELOPMENT

- 6.12 The redevelopment proposals involve the redevelopment of the existing Greggs Bakery site with 96 residential units and 2,757m<sup>2</sup> of commercial start-up space. To determine any future trip generation from the redeveloped site, trip rates were obtained from the TRICS database for residential and employment uses, using certain parameters.
- 6.13 The following parameters were used to calculate the residential trip rates:
- 03 Residential – Mixed private / affordable housing;
  - Located in Greater London;
  - Located in a Suburban Area, Neighbourhood Centre or Edge of Town Centre;
  - Survey date of 2008 onwards; and
  - Any weekday.
- 6.14 The following parameters were used to calculate the commercial start-up space trip rates:
- 02 Employment – Office;
  - Located in Greater London;
  - Located in a Suburban Area, Neighbourhood Centre or Edge of Town Centre;
  - Survey date of 2008 onwards;
  - Any weekday; and
  - Sites with a GFA up to 5,000m<sup>2</sup>.
- 6.15 The residential and office TRICS sites included in the analysis are summarised in Table 6.6 and the trip rates are included in Table 6.7. The full TRICS outputs are provided in Appendix E.

**Table 6.6: Residential and employment TRICS sites**

Land use	Site	Location	No. Units	GFA (m <sup>2</sup> )
Residential	EG-03-M-02	Southall	143	-
Residential	HD-03-M-01	Hayes	45	-
Residential	HD-03-M-03	Hayes	261	-
Employment - office	BT-02-A-02	Wembley	-	4,750
Employment - office	IS-02-A-01	Islington	-	5,500
Employment - office	SK-02-A-02	Rotherithe	-	2,371

**Table 6.7: Proposed residential and employment TRICS trip rates**

Trip type	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Residential (cars / LGVs)	0.078	0.249	0.327	0.165	0.089	0.254	1.211	1.378	2.589
Residential (HGVs)	0.004	0.004	0.008	0.000	0.000	0.000	0.012	0.012	0.024
Commercial (cars / LGVs)	0.444	0.096	0.540	0.143	0.467	0.610	3.605	3.241	6.846

Trip type	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Commercial (HGVs)	0.000	0.000	0.000	0.000	0.000	0.000	0.024	0.024	0.048

- 6.16 Using the trip rates in Table 6.7 and the number of residential units (96 units) and GFA of the commercial space (2,757m<sup>2</sup>), the number of trips forecast to be generated by the proposed redevelopment were calculated and are provided in Table 6.8.

**Table 6.8: Proposed residential (96 units) and employment (GFA 2,757m<sup>2</sup>) vehicular trip generation**

Trip type	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Residential (cars / LGVs)	7	24	31	16	9	24	116	132	249
Residential (HGVs)	0	0	1	0	0	0	1	1	2
<b>Total residential</b>	<b>8</b>	<b>24</b>	<b>32</b>	<b>16</b>	<b>9</b>	<b>24</b>	<b>117</b>	<b>133</b>	<b>251</b>
Commercial (cars / LGVs)	12	3	15	4	13	17	99	89	189
Commercial (HGVs)	0	0	0	0	0	0	1	1	1
<b>Total commercial</b>	<b>12</b>	<b>3</b>	<b>15</b>	<b>4</b>	<b>13</b>	<b>17</b>	<b>100</b>	<b>90</b>	<b>190</b>
<b>Total cars / LGVs</b>	<b>20</b>	<b>27</b>	<b>46</b>	<b>20</b>	<b>21</b>	<b>41</b>	<b>218</b>	<b>222</b>	<b>440</b>
<b>Total HGVs</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>4</b>
<b>Total trips</b>	<b>20</b>	<b>27</b>	<b>47</b>	<b>20</b>	<b>21</b>	<b>41</b>	<b>220</b>	<b>223</b>	<b>443</b>

- 6.17 The results show that across both peak periods combined there would be 88 total vehicular movements, of which one would be made by an HGV. Across the 12 hour period between 07:00-19:00, there would be 443 vehicle movements, of which four would be made by HGVs, ten times fewer than the number of HGV movements made by the existing site.
- 6.18 Using 2011 Census Journey to Work data for the Twickenham MSOAs as an origin for the residential trips and as a destination for the employment trips, the multi-modal trip generation of the site was calculated and is summarised in Table 6.9.

**Table 6.9: Proposed residential (96 units) and employment (GFA 2,757m<sup>2</sup>) multi-modal trip generation**

Mode	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Car driver	20	27	47	20	21	41	218	222	440
Car	1	2	3	2	1	3	12	13	25

Mode	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
passenger									
Tube	2	8	10	5	3	8	38	43	81
Train	11	38	49	25	14	39	182	207	389
Bus	5	18	23	12	7	19	88	100	188
Taxi	0	0	0	0	0	0	1	1	2
Motorcycle	0	2	2	1	1	2	8	9	18
Cycle	3	10	13	7	4	11	50	57	107
Walk	5	17	22	11	6	18	82	94	176
Other	0	0	0	0	0	0	1	2	3
<b>Total</b>	<b>48</b>	<b>123</b>	<b>171</b>	<b>84</b>	<b>57</b>	<b>141</b>	<b>680</b>	<b>748</b>	<b>1,428</b>

- 6.19 The results show that a total of almost 70% of employees and residents of the proposed redevelopment would travel to and from the site by sustainable modes, making it highly sustainable site in terms of transport.

## NET CHANGE IN VEHICLE TRIPS

### Scenario 1: Existing site and proposed redevelopment

- 6.20 To determine the net change in trips as a result of the proposed redevelopment, a comparison of the trip generation for the existing industrial site and the proposed residential and commercial redevelopment has been undertaken. The results are summarised in Table 6.10.

**Table 6.10: Net change in trips between existing site and proposed redevelopment**

Trip type	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
<b>Net change (cars / LGVs)</b>	<b>+15</b>	<b>+20</b>	<b>+34</b>	<b>+20</b>	<b>+19</b>	<b>+39</b>	<b>+192</b>	<b>+172</b>	<b>+364</b>
<b>Net change (HGVs)</b>	<b>-4</b>	<b>-4</b>	<b>-8</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>-18</b>	<b>-18</b>	<b>-36</b>
<b>Net change (total)</b>	<b>+11</b>	<b>+16</b>	<b>+32</b>	<b>+20</b>	<b>+19</b>	<b>+39</b>	<b>+114</b>	<b>+153</b>	<b>+327</b>

- 6.21 The comparison of the trip generation for the existing site and the proposed redevelopment shows that there is expected to be a net increase in light vehicle trips of 73 vehicles across both peak periods in total, which is equivalent to just over one additional vehicle every two minutes on average. While there would be a slight increase in light vehicles, the trips would be distributed between two accesses, rather than the one access for light vehicles, via Gould Road, that currently exists. As such, there would be an increase of just over one additional vehicle every four minutes from each access on average; which would be an imperceptible increase in traffic flow.
- 6.22 Changing the site to residential and commercial is estimated to lead to a reduction of 36 HGV movements across the 12 hour period assessed, of which eight would be in the AM peak period. This is a significant decrease in HGV movements considering the otherwise quiet residential nature of the surrounding area and the unsuitability of the local highway network to accommodate these trips. This

reduction would lead to a significant improvement in traffic flow on Edwin Road, where residents often experience congestion due to HGVs blocking the road while waiting to access the constrained Greggs site.

## Scenario 2: Existing site and permitted use

- 6.23 As the site is surplus to Greggs' operational requirements, they are planning to sell the site. Should it not be given permission for redevelopment to commercial and residential uses, the site has a permitted use for industrial uses and could be occupied by new industrial uses. As such a comparison between the trips generated by the existing site and any future industrial use has been undertaken and the results are summarised in Table 6.11.

**Table 6.11: Net change in trips between existing site and permitted industrial use**

Trip type	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
<b>Net change (cars / LGVs)</b>	+5	+1	+6	+12	+29	+43	+138	+90	+228
<b>Net change (HGVs)</b>	-3	0	-3	+1	0	+1	+18	+19	+33
<b>Net change (total)</b>	<b>+2</b>	<b>+1</b>	<b>+3</b>	<b>+14</b>	<b>+31</b>	<b>+44</b>	<b>+156</b>	<b>+110</b>	<b>+265</b>

- 6.24 The results show that the potential occupation of the site by another industrial user would lead to a total increase in 265 trips across the 12 hour period assessed compared to the existing use, of which 33 would be HGV movements. While this increase is slightly lower than if the site were redeveloped for residential and commercial uses, the difference in trips between the permitted use and the proposed use is 62 trips across the 12 hour period, which is on average five trips per hour. This is an imperceptible difference.
- 6.25 However, the difference in HGV movements between the permitted use and the proposed redevelopment is an increase of 69 movements across the 12 hour period if the site is continued to be used for industrial uses, which is equivalent to six additional HGV movements per hour on average along the already constrained Edwin Road. This would have a noticeable impact on the quality of the local environment for residents and would have a negative effect on the level of fear and intimidation experienced by vulnerable road users and overall residential amenity.

## SUMMARY

- 6.26 The multi-modal trip generation assessments for the existing, permitted and proposed uses of the site has shown that:
- Compared with the existing use, the proposed redevelopment would generate 73 additional light vehicle trips across both peak hours, which is just over one additional vehicle every two minutes or one additional vehicle every four minutes from each access on average, an imperceptible difference;
  - Compared with the existing use, the proposed redevelopment would generate 36 fewer HGV movements across the 12 hour period assessed between 07:00-19:00, of which eight would be in the AM peak period, resulting in a significant improvement of traffic flow on Edwin Road;



- The use of the site for industrial purposes in the future would lead to an increase in 265 trips across the 12 hour period assessed, compared with the site's existing use, of which 33 would be HGV movements; and
- If the site were redeveloped for residential and commercial purposes, there would be 69 fewer HGV movements across the day than if the site were used for industrial purposes in the future, which is equivalent to six fewer HGV movements per hour. This reduction in HGVs is more likely to be noticeable than a slight increase in car movements.

# 7 Suitability of Site for Continued Industrial Use

## INTRODUCTION

- 7.1 Based upon the analysis presented in this Transport Statement, this section evaluates whether the Greggs site in Twickenham is suitable for continued industrial use, taking into account the local highway network, the safety of vulnerable road users and the impact on the environment.

## SITE ACCESS AND LOCAL HIGHWAY NETWORK

- 7.2 The Greggs bakery site dates back to the Victorian era when factories were built with residential areas immediately surrounding it to cater for the workforce and goods were transported by barges on waterways such as the River Crane to the north of the site, and by horse-pulled carriages. While motor vehicles had been invented, they were rarely seen until the late 19<sup>th</sup> Century when they were still significantly less prevalent than today. As such, the site and the surrounding residential roads were not originally designed to cater for the volume of vehicle movements that occur today and particularly not for the size of HGVs that currently serve the site.
- 7.3 The total carriageway widths of the surrounding roads are not suitable for modern industrial roads according to the FTA design guidance which states that two-way access roads should have a minimum width of 7.3m, which is approximately 0.2m less than Edwin Road (7.2m wide). When considering the on-street parking along both sides of the carriageway on Edwin Road, the effective useable width of the road is only 3.3m which is less than half the minimum width for a road suitable for the site.
- 7.4 Furthermore, between Heath Road and the site, HGVs are required to manoeuvre around the tight junction of Colne Road and Marsh Farm Road and the corner of Marsh Farm Road and Edwin Road. Swept path analysis undertaken for an articulated HGV (16.5m) and a rigid HGV showed that the vehicles were unable to make the manoeuvre without going over the kerbline, which would result in the vehicles mounting the kerb and potentially conflicting with pedestrians. The narrow width of the two-way Marsh Farm Road also requires HGVs to occupy both sides of the road, increasing the potential for conflict with oncoming vehicles. It should also be noted that the proximity of the height restricted railway bridge to the junction of Colne Road / Marsh Farm Road means that it is unlikely that two HGVs would be able to pass each other, potentially causing queuing back to Heath Road, the main road.
- 7.5 The route described above is the route which vehicles are instructed to follow between the main road and the site as it is the most suitable for HGVs, but analysis has shown that it is not suitable at all for the size of vehicles accessing the site, which is typical of other industrial sites. It should be noted that alternative routes between the main road and the site are less suitable due to narrower carriageways and junctions with tighter radii.
- 7.6 The site access used by HGVs on Edwin Road is narrow and provides insufficient room for vehicles to turn into the site, which is further constrained by the presence of parked cars on both sides of the carriageway on the approach to the junction. As such, HGVs are required to reverse into the site access, which increases the risk of conflicting with other road users and pedestrians on the footway. Swept path analysis has shown that while reversing in, both the rigid and articulated vehicles went over the kerbline and would therefore mount the pavement, potentially conflicting with passing pedestrians. While egressing from the site, the articulated vehicle went over the kerbline and only just managed to straighten its path before conflicting with parked cars. This site access is unsuitable for HGV movements due to the constrained space on the approach to and at the access junction, and the opportunities for potential conflicts with other road users.

- 7.7 It should also be noted that the existing site has insufficient car parking capacity for employees and therefore there is an overspill onto the surrounding residential roads such as Edwin Road and Crane Road, which combined with residential demand for parking leads to a significant level of parking on-street. Therefore, if the site is redeveloped for mixed-use purposes where all parking is provided on-site, a reduction in the demand for on-street parking from the industrial uses would release some capacity. This would provide increased number of passing places for cars on the roads which are effectively one-way currently, improving the traffic flow along the residential streets.
- 7.8 As shown above, in terms of access and the local highway network, the site is not suitable for continued or future industrial use. It is heavily constrained by the narrow and residential nature of the roads and the tight radii at junctions and on bends, which are not suitable for frequent HGV movements. It is unlikely that potential occupants looking for facilities the size of the site would be interested due to the constraints presented by the highway network. Potential industrial occupants are likely to favour modern purpose built facilities which provide sufficient access on the highway network and where they are not subject to the constraints of the existing site.

## PEDESTRIAN AND CYCLIST SAFETY

- 7.9 The characteristics and nature of the pedestrian/cycle and vehicle movements in the predominantly residential area are not conducive to HGV movements. The site has been used for industrial purposes since the Victorian era when the transport network was significantly different and HGVs did not exist. The residential areas that have grown up around the factory were also established prior to the use of HGVs and the existing intense use of the site. Therefore, the local highway network was not designed to accommodate large vehicles such as HGVs and the quantity of on-street parking on the narrow Victorian streets. As such in the interests of safety noise and air quality, the number of HGVs using the roads should be minimised to reduce potential conflicts with other road users and vehicle emissions
- 7.10 Land use and road user composition have a significant impact upon the safety of all road users, especially pedestrians and cyclists. The IEMA's Guidelines for the Environmental Assessment of Road Traffic provides broad principles of how to assess the impact of a scheme upon users, including the impact on fear and intimidation, amenity and accidents and safety.
- 7.11 The fear and intimidation of pedestrians and cyclists is dependent on the volume of traffic, the proportion of the volume comprised of HGVs, and the proximity of pedestrians and cyclists to the flow of traffic. As the footways on Edwin Road and Colne Road are not shared cycle footways, cyclists are required to cycle on the carriageway with the two-way flow of traffic.
- 7.12 The London Cycle Design Standards (2014) state that the dynamic envelope of a moving cyclist is approximately 1.0m, which includes an average 0.75m static width plus an allowance for movement. The document states that the minimum safe clearance distance between the edge of a cyclist and the edge of a vehicle moving at 20mph is 1.0m, which increases to 1.5m for vehicles travelling at 30mph. Therefore for vehicles to overtake a cyclist, at least a further 2.0m is required in addition to the space that the vehicle takes up on the road. The useable width of carriageway on Edwin Road is 3.3m, which does not provide sufficient width for cyclists to be overtaken safely by a car or HGV. As such, vehicles may execute unsafe overtaking procedures or follow cyclists around the road network, increasing the fear and intimidation that they experience. The redevelopment of the site as a mixed-use scheme rather than industrial-related employment would reduce the number of HGV trips, at the Greggs site and along Edwin Road and Colne Road, reducing the magnitude of fear and intimidation experienced by both pedestrians and cyclists.
- 7.13 Pedestrian and cyclist amenity relates to the pleasantness of a journey, and is affected by traffic flow and composition, and separation of the users from the traffic. Similarly to fear and intimidation, the redevelopment of the site as mixed-use would provide a more pleasant environment for pedestrians and cyclists, with fewer HGVs impacting upon their journey.

- 7.14 Due to the limited visibility of pedestrians, and especially cyclists, to HGV drivers, an increase in trips by these vehicles is likely to have a detrimental effect on the safety of vulnerable road users. This is a particular concern on Edwin Road which has significant levels of on-street parking and therefore would further reduce the visibility of any pedestrians or cyclists wishing to cross the road.

## OTHER ENVIRONMENTAL ISSUES

- 7.15 In addition to the impact upon pedestrian and cyclist safety, the retention of the site for industrial land uses would have a detrimental effect on the noise and air quality of the surrounding area, including the residential roads that are used to access the strategic road network, including the A305 and A316.
- 7.16 Furthermore, by removing industrial use from the Greggs site, HGV numbers will be reduced. This meets Richmond's aspirations to reduce the NO<sub>2</sub> emissions in the Richmond Air Quality Management Area (AQMA).
- 7.17 The removal of the industrial designation of the site would have an impact not just on the physical environment, but also on the amenity of the area. The reduction in noise and deliveries by HGV to the site, particularly at antisocial hours, would have a positive impact on the pleasantness and amenity of the area for surrounding residents. The proximity of the houses to the road, due to the narrow design of the Victorian streets, means that the noise and vibration generated by large vehicles such as HGVs is more intense than in less dense residential areas and the reduction of HGVs would be positive.

## SUMMARY

- 7.18 Based upon the findings in this TS, the Greggs site in Twickenham is considered to be unsuitable for continued and future industrial use for a number of reasons:
- The site and the local highway network was designed in the Victorian era when motor vehicles were not as prevalent and industrial sites were not served by HGVs;
  - The site has outgrown its location in terms of the number of trips it generates and the suitability of the highway network for its current uses;
  - The local highway network is spatially constrained along straight sections, at corners and at junctions due to the narrow design and a reduced useable width due to on-street parking, and is not suitable for frequent HGV movements;
  - The redevelopment of the site for mixed-use purposes would relieve capacity on the local highway network and reduce the level of fear and intimidation experienced by residents, pedestrians and cyclists as a result of frequent HGV movements; and
  - A reduction in the quantity of HGVs accessing the site as a result of mixed-use redevelopment would have a positive impact on air quality and noise and would meet Richmond's aspirations to reduce NO<sub>2</sub> emissions in the AQMA.

## 8 Summary and Conclusion

- 8.1 JMP Consultants Ltd have been commissioned by Colliers International to provide transport consultancy services for a site located off Gould Road and Edwin Road in the London Borough of Richmond (LBR), with potential for a residential-led mixed-use planning application. The site currently comprises production facilities for Greggs Bakery but is surplus to requirements and therefore is due to be closed. Due to its location embedded in an existing residential area and the constrained nature of the local highway network, the site is not appropriate for an allocation for industrial use or for solely office use, either at the current time or in the future.
- 8.2 The redevelopment proposals are for the 96 residential units and the provision of 2,757m<sup>2</sup> of commercial start-up space. Car and cycle parking would be provided in line with the London Plan requirements. The vehicular and pedestrian access on Gould Road would be retained, and the principle of access on Edwin Road would be retained but relocated slightly to the east and designed to include access for pedestrians and cyclists.
- 8.3 The proposed redevelopment would generate approximately 87 trips by light vehicles across both peak periods which, as an average, is equal to less than one vehicle trip each minute across both accesses. While this is an increase in light vehicles compared to the existing use, the change of just over one additional vehicle every two minutes is imperceptible to other road users and local residents. However, the redevelopment of the site would generate 36 fewer HGV movements across the 12 hour period assessed, which due to the vehicles noise and disruption would be a significant improvement for residents.
- 8.4 With regards to policy, the redevelopment of the site as a mixed-use scheme would support the NPPF and FALP's requirement for developments that generate significant movement, such as those with mixed-uses, to be located where the use of sustainable transport modes can be maximised. The location of the site within a 15 minute walk of Twickenham train station, a key public transport interchange in the area, would better support the significant proportion of trips made by sustainable modes in mixed-use developments, than the more car/HGV dependent trips associated with industrial land uses. FALP also states that developments should not adversely affect safety on the transport network which, should the site be developed for industrial-related employment purposes, is likely to occur due to the unsuitable nature of the local highway network and site access arrangements for HGV movements and the increased number of HGV movements expected for potential future industrial use.
- 8.5 Following a review of the site's location in the context of the local highway network and the site access arrangements, it is considered that redeveloping the site for industrial purposes would present substandard access for HGVs, which could result in a highway objection on reasons of highway safety. This is a result of both the local highway infrastructure in its current form being unable to sufficiently accommodate significant HGV movements due to considerable on-street parking, and the access arrangements for the site itself from Edwin Road being unsuitable for HGVs.
- 8.6 Ease of access to sites for HGVs and adequate capacity on the surrounding local highway network are key factors required for industrial land uses to operate efficiently. The constrained access arrangements of the site for HGVs and light vehicles due to the narrow nature of the two-way road and the tight junction radii, and the restrictions imposed by significant on-street parking along these roads, are likely to affect the demand of potential occupiers considering the site.
- 8.7 Furthermore, its requirement for vehicles to route along a network of residential and narrow two-way local streets to access the wider strategic road network make it unsuitable to be used as a modern industrial site, due to the safety and environmental implications for other road users and local residents. Accessing the site from the wider area requires vehicles to route along roads through residential areas with housing fronting onto both sides of the carriageway. These routes are unsuitable for high volumes

of HGVs due to the detrimental impacts on residents in terms of noise, air quality, safety and overall amenity

- 8.8 The redevelopment of the site for mixed-use purposes would reduce the volume of traffic, including HGVs, improving the fear and intimidation, safety and amenity for all road users, particularly pedestrians and cyclists. It would also lead to an improvement in air and noise quality for people in the vicinity of the site, and who live along routes to the strategic road network and motorways. A reduction in HGVs would result in a reduction in NO<sub>2</sub> emissions, helping Richmond to achieve its AQMA aspirations.
- 8.9 Therefore, on transport and highway terms it is considered that the redevelopment of the site as a mixed-use scheme rather than industrial would be beneficial for the local community, local road users and the environment. The proposed redevelopment has been shown to have an imperceptible impact on the local highway network in terms of increase in light vehicle trips and will benefit local residents and other road users by reducing the number of HGV trips.



# Appendix A

## DEVELOPMENT MASTERPLAN



A1

1:250 @ A1

010 M

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Ayre Chamberlain Gaunt

Site Boundary

Unit Schedule	
1 Bed	9 Units
2 Bed	54 Units
3 Bed	15 Units
4 Bed	18 Units
Commercial	2757 sq m
No. of units	96 Units
Density	401 HR/Ha

ACGARCHITECTS.CO.UK  
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AYRE  
CHAMBERLAIN  
GAUNT

REV A	DATE 25/2/16	NOTES Issue for pre-planning application
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DRAWN BY RA	PROJECT Gould Road Twickenham
CHECKED BY GW	DRAWING TITLE Proposed Site Plan
JOB NO. 216	
STATUS PLN	DRAWING NO. 216_PLN_100
	REV A

## Appendix B

### PERSONAL INJURY ACCIDENT DATA



## Colne Road GIS Area Collisions - 5 years to 30-Nov -2015 (provisional)

### Summary of Accidents Selected

Site Reference and Description (zero accident counts shown in bold)	Date Period	Accidents
MD01 GIS AREA B24_Colne_Rd (P)	60 MTS TO NOV-2015	10

*The description of how the accident occurred and the contributory factors are the reporting officer's opinion at the time of reporting and may not be the result of extensive investigation*



## Colne Road GIS Area Collisions - 5 years to 30-Nov -2015 (provisional)

MD01 GIS AREA B24_Colne_Rd (P)										60 MTS TO NOV-2015 SORTED BY DATE	
1	0112TW60058	SAT 28/01/12 13:30	LIGHT	HEATH ROAD J/WLONMDON ROAD				24	LINK 104-131	515610 / 173120	
POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN STOP SIGN NO XING FACILITY IN 50M											
PED CROSSED ROAD BETWEEN MOVING TRAFFIC AND WAS HIT BY V1											
CASUALTY 001 (001) (? Yrs - M UNKN)			SLIGHT	PEDESTRIAN		UNKNOWN					
VEHICLE	001 (000)	CAR	(56 Yrs - M TW4 )		GOING AHEAD RIGHT BEND SW TO E			JCT MID			
BT - DRV NOT CONTACTED					FRONT HIT FIRST						
C001	A	801 (CROSSED ROAD MASKED BY STATIONARY OR PARKED VEHICLE)				C001	A	803 (FAILED TO JUDGE VEHICLE'S PATH OR SPEED)			
C001	A	808 (CARELESS/RECKLESS/IN A HURRY)				V001	A	405 (FAILED TO LOOK PROPERLY)			
2	0112TW60173	THU 17/05/12 09:40	LIGHT	HEATH ROAD/THE GREEN J/W COLNE ROAD				24	LINK 104-131	515580 / 173110	
POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M											
V1 TURNED LEFT ACROSS PATH V2 (CYCLIST) CAUSING A COLLISION & RIDER TO FALL OFF											
CASUALTY 001 (002) (36 Yrs - F TW12)			SLIGHT	DRIVER/RIDER							
VEHICLE	001 (002)	GDS 3.5-7.5T	(42 Yrs - M TW7 )		TURNING LEFT			SW TO NW		JCT MID	
BT - NOT REQUESTED					N/S HIT FIRST						
VEHICLE	002 (001)	PEDAL CYCLE	(36 Yrs - F TW12)		GOING AHEAD OTHER			SW TO NE		JCT MID	
BT - NOT APPLICABLE					FRONT HIT FIRST						
V001	A	403 (POOR TURN OR MANOEUVRE)				V001	A	404 (FAILED TO SIGNAL/ MISLEADING SIGNAL)			
V001	A	405 (FAILED TO LOOK PROPERLY)				V001	A	407 (PASSING TOO CLOSE TO CYCLIST, HORSE RIDER OR PEDESTRIAN)			
3	0112TW60241	SUN 08/07/12 20:11	DARK	COLNE ROAD J/W ALBION ROAD				24	CELL 515000/173000	515410 / 173140	
POLICE - AT SCENE ROAD-WET WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M											
DRV V1 HAS POOR EYESIGHT & DRV V2 WAS TRAVELLING TO FAST FOR CONDITIONS & BOTH FAILED TO GIVEWAY & COLLIDED											
CASUALTY 001 (002) (27 Yrs - M TW3 )			SLIGHT	DRIVER/RIDER							
VEHICLE	001 (002)	CAR	(82 Yrs - M TW2 )		GOING AHEAD OTHER			W TO E		JCT MID	
BT - NEGATIVE					FRONT HIT FIRST						
VEHICLE	002 (001)	M/C 50-125CC	(27 Yrs - M TW3 )		GOING AHEAD OTHER			E TO W		JCT MID	
BT - NEGATIVE					FRONT HIT FIRST						
V001	A	504 (UNCORRECTED, DEFECTIVE EYESIGHT)				V001	A	302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS)			
V002	A	307 (TRAVELLING TOO FAST FOR CONDITIONS)				V002	A	302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS)			



## Colne Road GIS Area Collisions - 5 years to 30-Nov -2015 (provisional)

MD01 GIS AREA B24_Colne_Rd (P)										60 MTS TO NOV-2015 SORTED BY DATE	
<b>4</b>	0112TW60323	FRI 14/09/12 09:08	LIGHT	THE GREEN J/W LION ROAD				24	LINK 104-131	515580 / 173110	
POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M											
V1 TURNED AND V2 (CYCLIST) WASNT PAYING ATTENTION AND HIT THE SIDE OF V1											
CASUALTY 001 (002) (30 Yrs - M TW12) SLIGHT DRIVER/RIDER											
VEHICLE	001 (002)	CAR	(42 Yrs - F TW4 )	TURNING LEFT	SW TO NW					JCT MID	
BT - NOT REQUESTED											
VEHICLE	002 (001)	PEDAL CYCLE	(30 Yrs - M TW12)	GOING AHEAD OTHER	SW TO NE					JCT MID	
BT - NOT APPLICABLE											
V002 A 405 (FAILED TO LOOK PROPERLY)						V002 A 602 (CARELESS/RECKLESS/IN A HURRY)					
<b>5</b>	0113TW60114	MON 22/04/13 08:13	LIGHT	THE GREEN J/W COLNE ROAD				24	LINK 104-131	515580 / 173110	
POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M											
V2 MAIN ROAD WEST-BD BEGAN TO TURN RIGHT, AS V1 BEGAN AN OVERTAKE											
CASUALTY 001 (001) (18 Yrs - M W3 ) SLIGHT DRIVER/RIDER											
VEHICLE	001 (002)	M/C 50-125CC	(18 Yrs - M W3 )	OVERTAKE MOVE VEH O/S	NE TO SW					JCT MID	
BT - NOT REQUESTED											
VEHICLE	002 (001)	CAR	(32 Yrs - F TW2 )	TURNING RIGHT	NE TO NW					JCT MID	
BT - NOT REQUESTED											
V001 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)						V002 A 405 (FAILED TO LOOK PROPERLY)					





## Colne Road GIS Area Collisions - 5 years to 30-Nov -2015 (provisional)

MD01 GIS AREA B24_Colne_Rd (P)										60 MTS TO NOV-2015 SORTED BY DATE	
6	0113TW60306	WED 04/09/13 13:32	LIGHT	HEATH ROAD J/W HEATH GARDENS				24	LINK 104-131	515620 / 173120	
POLICE - AT SCENE			ROAD-DRY	WEATHER-FINE		SINGLE CWY	T/STAG JUN	GIVE WAY/UNCONT		NO XING FACILITY IN 50M	
V2 TURNED RIGHT ACROSS PATH OF ONCOMING V1											
CASUALTY			001 (002)	(32 Yrs - F SW14)	SLIGHT	DRIVER/RIDER					
VEHICLE	001 (002)	CAR	(68 Yrs - F TW16)			TURNING RIGHT		W TO S		LEAVING MAIN RD	
								N/S HIT FIRST			
VEHICLE	002 (001)	PEDAL CYCLE	(32 Yrs - F SW14)			GOING AHEAD OTHER		E TO W		JCT APP	
								FRONT HIT FIRST			
V001	A	405 (FAILED TO LOOK PROPERLY)					V001 B 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)				
V001	B	701 (VISION AFFECTED - STATIONARY OR PARKED VEHICLE(S))					V002 B 701 (VISION AFFECTED - STATIONARY OR PARKED VEHICLE(S))				
V002	A	405 (FAILED TO LOOK PROPERLY)									
7	0114TW60121	FRI 21/03/14 08:38	LIGHT	HEATH ROAD J/W HEATH GARDENS				24	LINK 104-131	515630 / 173110	
POLICE - AT SCENE			ROAD-DRY	WEATHER-FINE		SINGLE CWY	T/STAG JUN	GIVE WAY/UNCONT		NO XING FACILITY IN 50M	
E/B V1 TURNED RIGHT AS UNIDENT VEH ALSO TURNED RIGHT; V1 COLLIDED WITH PED CAS1 AND PED CAS2											
CASUALTY			001 (001)	(9 Yrs - M TW1 )	SLIGHT	PEDESTRIAN	CROSSING ROAD (NOT ON XING)		W BOUND	FROM DRIVERS N/SIDE	
								Sch Attended : N/K			
CASUALTY			002 (001)	(7 Yrs - M TW1 )	SLIGHT	PEDESTRIAN	CROSSING ROAD (NOT ON XING)		W BOUND	FROM DRIVERS N/SIDE	
								Sch Attended : N/K			
VEHICLE	001 (000)	CAR	(34 Yrs - F TW2 )			TURNING RIGHT		W TO SE		JCT MID	
								FRONT HIT FIRST			
C001	B	802 (FAILED TO LOOK PROPERLY)					C002 B 802 (FAILED TO LOOK PROPERLY)				
C001	B	803 (FAILED TO JUDGE VEHICLE'S PATH OR SPEED)					C002 B 803 (FAILED TO JUDGE VEHICLE'S PATH OR SPEED)				



## Colne Road GIS Area Collisions - 5 years to 30-Nov -2015 (provisional)

MD01 GIS AREA B24_Colne_Rd (P)										60 MTS TO NOV-2015 SORTED BY DATE	
8	0114TW60239		THU 29/05/14 13:49		LIGHT NFL: THE GREEN 26M W J/W HEATH GARDENS				24	LINK 104-131	515600 / 173110
POLICE - AT SCENE			ROAD-DRY		WEATHER-FINE		SINGLE CWY NO JUN IN 20M		NO XING FACILITY IN 50M		
W/B V1 PASSED PARKED V2 AND WAS STRUCK BY V2 CAB DOOR SWINGING OPEN INTO HER FACE											
CASUALTY			001 (001) (43 Yrs - F TW10)		SERIOUS		DRIVER/RIDER				
VEHICLE	001	(002)	PEDAL CYCLE (43 Yrs - F TW10)		OVERTAKE STAT VEH O/S		E TO W	COMM TO/FROM WORK			
			BT - NOT APPLICABLE				FRONT HIT FIRST				
					HIT PARKED VEH						
VEHICLE	002	(001)	GDS => 7.5T (36 Yrs - M SL1 )		PARKED		P TO P	JNY PART OF WORK			
			BT - NEGATIVE				O/S HIT FIRST				
V002 B 405 (FAILED TO LOOK PROPERLY)											
V002 A 904 (VEHICLE DOOR OPENED OR CLOSED NEGLIGENTLY)											
V001 B 403 (POOR TURN OR MANOEUVRE)											
9	0114TW60434		SAT 04/10/14 12:19		LIGHT HEATH ROAD J/W LION ROAD				24	LINK 104-131	515610 / 173120
POLICE - AT SCENE			ROAD-WET		RAINING		SINGLE CWY T/STAG JUN		GIVE WAY/UNCONT NO XING FACILITY IN 50M		
E/B V1 CYCLED ON N/S OF VEHICLES, APPROACHED GAP ; W/B V2 TURNED RIGHT INTO GAP, COLLIDED V1											
CASUALTY			001 (001) (43 Yrs - M SW15)		SLIGHT		DRIVER/RIDER				
VEHICLE	001	(002)	PEDAL CYCLE (43 Yrs - M SW15)		OVERTAKING NEARSIDE		W TO E	JCT MID			
			BT - NOT APPLICABLE				FRONT HIT FIRST				
VEHICLE	002	(001)	CAR (? Yrs - F 1 )		TURNING RIGHT		E TO N	JCT MID			
			BT - DRV NOT CONTACTED				N/S HIT FIRST				
V001 A 405 (FAILED TO LOOK PROPERLY)											
V002 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)											
V002 A 403 (POOR TURN OR MANOEUVRE)											

**Colne Road GIS Area Collisions - 5 years to 30-Nov -2015 (provisional)**

MD01 GIS AREA B24_Colne_Rd (P)	60 MTS TO NOV-2015 SORTED BY DATE
--------------------------------	-----------------------------------

10 0115TW60256 FRI 31/07/15 21:40 DARK HEATH ROAD J/W LION ROAD	24 LINK 104-131	515610 / 173120
---	-----------------	-----------------

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN	GIVE WAY/UNCONT NO XING FACILITY IN 50M
---	---

W/B V2 TURNED RIGHT; E/B V1 BRAKED TO AVOID BUT COLLIDED

CASUALTY 001 (001) (19 Yrs - M TW2 ) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (19 Yrs - M TW2 )	TURNING RIGHT	E TO N	JCT MID
BT - NOT REQUESTED		N/S HIT FIRST	

VEHICLE 002 (001) M/C <= 50CC (57 Yrs - M TW13)	GOING AHEAD OTHER	W TO E PUPIL RIDING TO/FROM SCH	JCT MID
BT - NEGATIVE		FRONT HIT FIRST	

V002 A 403 (POOR TURN OR MANOEUVRE)

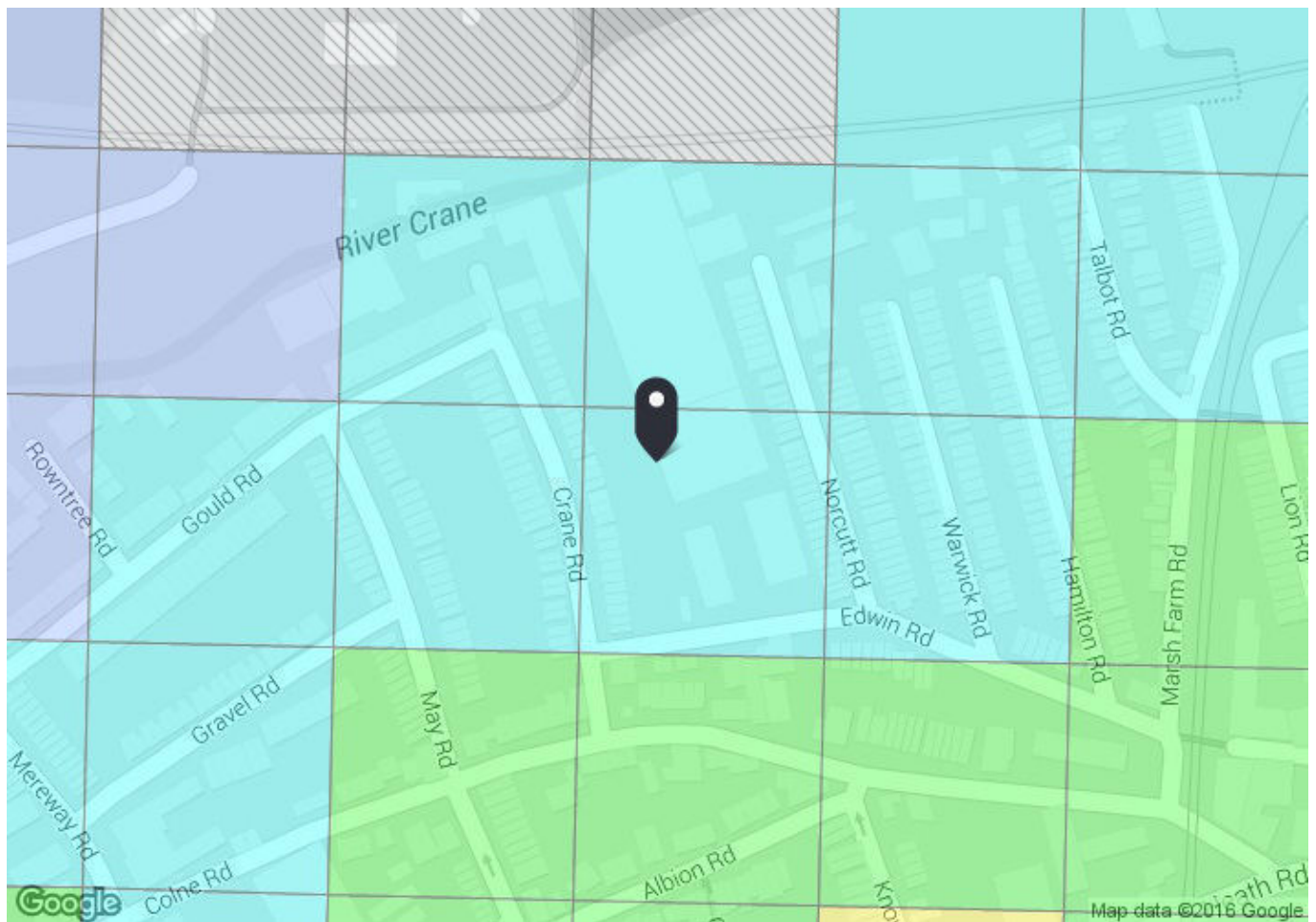
V002 A 405 (FAILED TO LOOK PROPERLY)

End of Accidents for MD01 GIS AREA B24\_Colne\_Rd (P)

End of Report

# Appendix C

## PTAL REPORT



PTAL output for 2011 (Base year)

2

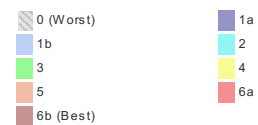
30 Crane Rd, Twickenham, Greater London TW2 6RY, UK

Easting: 515327, Northing: 173272

Grid Cell: 45397

Report generated: 19/04/2016

#### Map key - PTAL



#### Map layers

PTAL (cell size: 100m)

#### Calculation Parameters

Day of Week	M-F
Time Period	AM Peak
Walk Speed	4.8 kph
Bus Node Max. Walk Access Time (mins)	8
Bus Reliability Factor	2.0
LU Station Max. Walk Access Time (mins)	12
LU Reliability Factor	0.75
National Rail Station Max. Walk Access Time (mins)	12
National Rail Reliability Factor	0.75

Calculation data

Mode	Stop	Route	Distance (metres)	Frequency(vph)	Walk Time (mins)	SWT (mins)	TAT (mins)	EDF	Weight	AI
Bus	TWICKENHAM GREEN	290	452.01	3	5.65	12	17.65	1.7	0.5	0.85
Bus	TWICKENHAM GREEN	281	452.01	7.5	5.65	6	11.65	2.58	1	2.58
Bus	TWICKENHAM GREEN	R70	452.01	6	5.65	7	12.65	2.37	0.5	1.19
Bus	TWICKENHAM GREEN	267	452.01	6	5.65	7	12.65	2.37	0.5	1.19
Bus	TWICKENHAM GREEN	110	404.43	3	5.06	12	17.06	1.76	0.5	0.88
Bus	TWICKENHAM GREEN	490	404.43	5	5.06	8	13.06	2.3	0.5	1.15
Bus	TWICKENHAM GREEN	H22	404.43	5	5.06	8	13.06	2.3	0.5	1.15
Total Grid Cell AI:										8.97



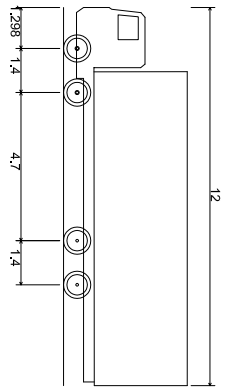
# Appendix D

## SWEPT PATH ANALYSIS

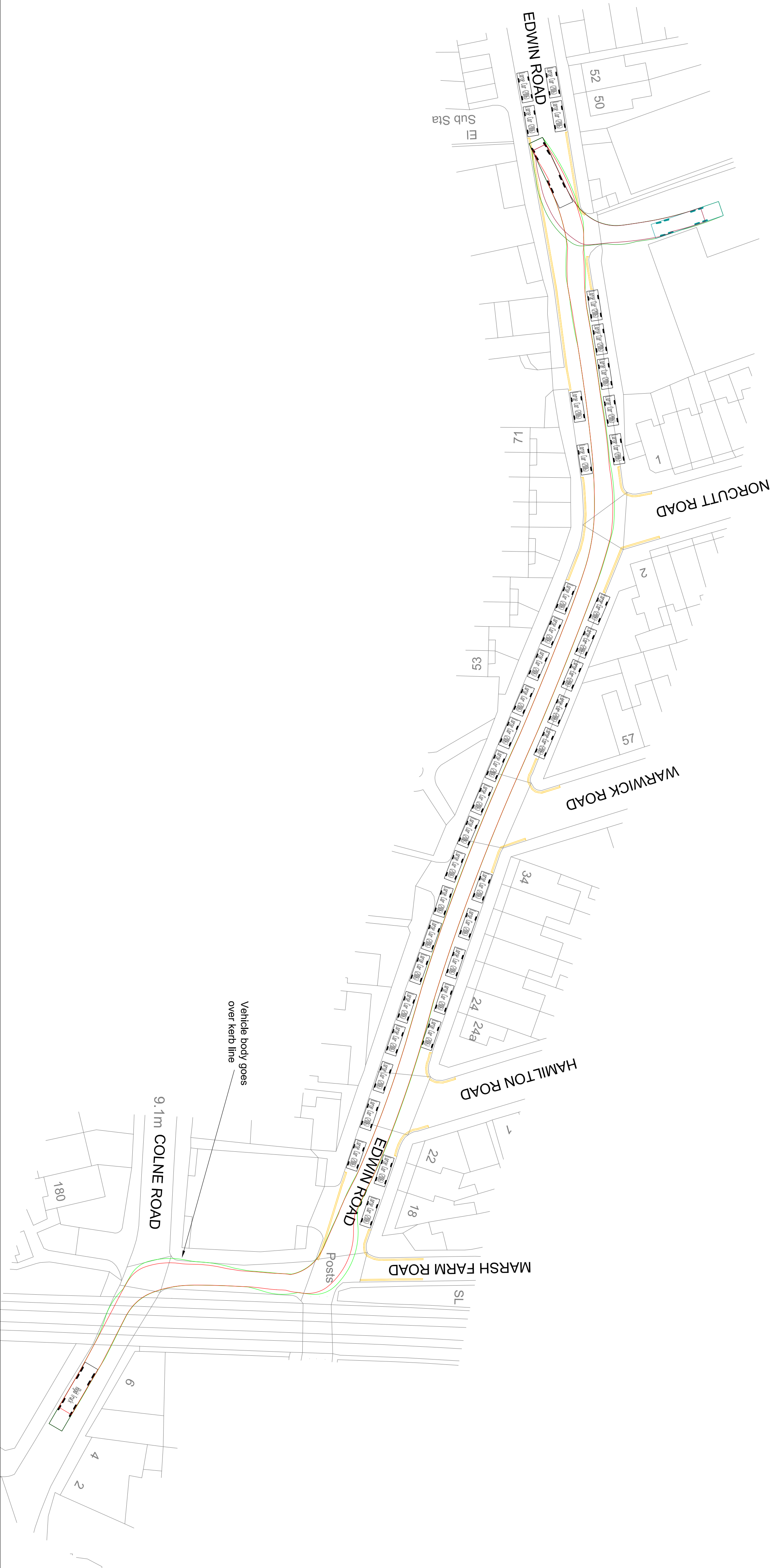




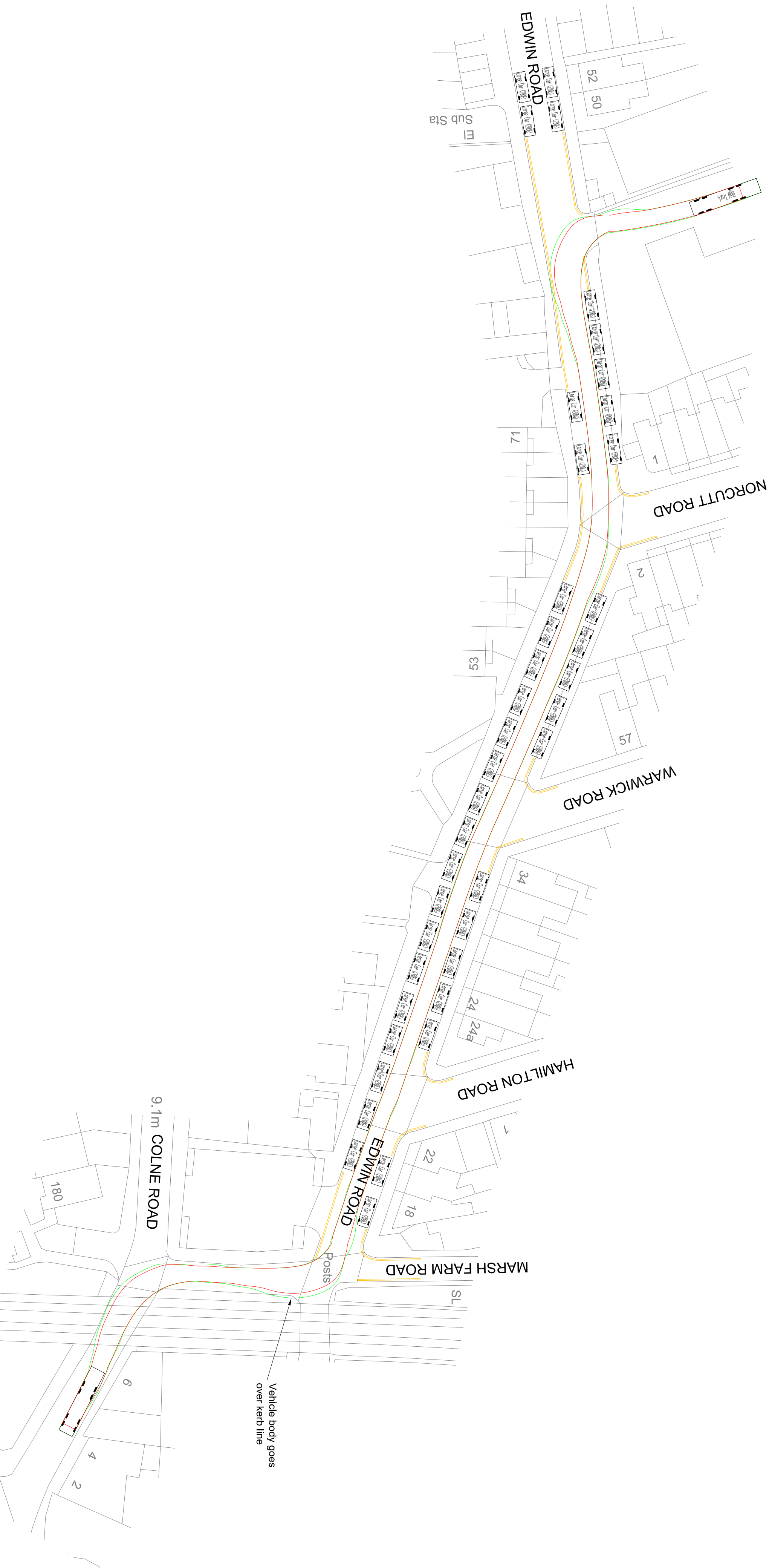
Notes



Rigid Truck  
Overall Length 12.000m  
Overall Width 2.500m  
Overall Body Height 3.928m  
Min Body Ground Clearance 0.412m  
Min Body Height 2.447m  
Lock to Lock Time 6.00s  
Kerb to Kerb Turning Radius 11.900m



Rigid Truck Entering Site



Rigid Truck Exiting Site

Rev		Date	Revisions details	Drawn	Checked/Approved
© This drawing is the property of JMP Consultants Limited and the information can only be reproduced with their prior permission.					
27-32 Old Jewry London EC2N 6BQ T 020 3714 4400 E london@jmp.co.uk W www.jmp.co.uk					
JMP					
Client Greggs plc					
Project Gould Road, Twickenham					
Title Swerft Path Analysis at Edwin Road Sheet 2 of 2					
Drawn	RM	Checked	JC	Approved	RS
Original Size	A1	Date	15/04/2016	Scale	1:500
Drawing Status	Information	Drawing Number	ST17096-02	Rev.	-

# Appendix E

## TRICS OUTPUTS

Calculation Reference: AUDIT-846402-160405-0415

**TRIP RATE CALCULATION SELECTION PARAMETERS:**

Land Use : 02 - EMPLOYMENT  
 Category : C - INDUSTRIAL UNIT

**MULTI-MODAL VEHICLES**Selected regions and areas:**01 GREATER LONDON**

BT BRENT

1 days

*This section displays the number of survey days per TRICS® sub-region in the selected set*

**Filtering Stage 2 selection:**

*This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.*

Parameter: Gross floor area  
 Actual Range: 6100 to 6100 (units: sqm)  
 Range Selected by User: 620 to 6100 (units: sqm)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/08 to 10/09/14

*This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.*

Selected survey days:

Wednesday 1 days

*This data displays the number of selected surveys by day of the week.*

Selected survey types:

Manual count 1 days  
 Directional ATC Count 0 days

*This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.*

Selected Locations:

Suburban Area (PPS6 Out of Centre) 1

*This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.*

Selected Location Sub Categories:

Industrial Zone 1

*This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.*

**Filtering Stage 3 selection:**Use Class:

B2 1 days

*This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.*

**Filtering Stage 3 selection (Cont.):**

Population within 1 mile:

50,001 to 100,000 1 days

*This data displays the number of selected surveys within stated 1-mile radii of population.*

Population within 5 miles:

500,001 or More 1 days

*This data displays the number of selected surveys within stated 5-mile radii of population.*

Car ownership within 5 miles:

0.6 to 1.0 1 days

*This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.*

Travel Plan:

No 1 days

*This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.*



LIST OF SITES relevant to selection parameters

1	<b>BT-02-C-02</b> ABBEYDALE ROAD  ALPERTON Suburban Area (PPS6 Out of Centre) Industrial Zone Total Gross floor area: 6100 sqm Survey date: WEDNESDAY 10/09/14	<b>FOOD PRODUCTION</b>         Survey Type: MANUAL	<b>BRENT</b>
---	---	---	--------------

*This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL VEHICLES**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.082	1	6100	0.000	1	6100	0.082
06:30 - 07:00	<b>1</b>	<b>6100</b>	<b>0.361</b>	1	6100	0.164	<b>1</b>	<b>6100</b>	<b>0.525</b>
07:00 - 07:30	1	6100	0.115	1	6100	0.098	1	6100	0.213
07:30 - 08:00	1	6100	0.082	1	6100	0.049	1	6100	0.131
08:00 - 08:30	1	6100	0.033	1	6100	0.049	1	6100	0.082
08:30 - 09:00	1	6100	0.082	1	6100	0.049	1	6100	0.131
09:00 - 09:30	1	6100	0.066	1	6100	0.066	1	6100	0.132
09:30 - 10:00	1	6100	0.066	1	6100	0.016	1	6100	0.082
10:00 - 10:30	1	6100	0.098	1	6100	0.115	1	6100	0.213
10:30 - 11:00	1	6100	0.066	1	6100	0.098	1	6100	0.164
11:00 - 11:30	1	6100	0.082	1	6100	0.033	1	6100	0.115
11:30 - 12:00	1	6100	0.033	1	6100	0.082	1	6100	0.115
12:00 - 12:30	1	6100	0.033	1	6100	0.016	1	6100	0.049
12:30 - 13:00	1	6100	0.000	1	6100	0.049	1	6100	0.049
13:00 - 13:30	1	6100	0.033	1	6100	0.049	1	6100	0.082
13:30 - 14:00	1	6100	0.082	1	6100	0.049	1	6100	0.131
14:00 - 14:30	1	6100	0.016	1	6100	0.066	1	6100	0.082
14:30 - 15:00	1	6100	0.082	1	6100	0.066	1	6100	0.148
15:00 - 15:30	1	6100	0.066	1	6100	0.049	1	6100	0.115
15:30 - 16:00	1	6100	0.049	1	6100	0.016	1	6100	0.065
16:00 - 16:30	1	6100	0.098	1	6100	0.066	1	6100	0.164
16:30 - 17:00	1	6100	0.197	1	6100	0.049	1	6100	0.246
17:00 - 17:30	1	6100	0.131	<b>1</b>	<b>6100</b>	<b>0.328</b>	1	6100	0.459
17:30 - 18:00	1	6100	0.016	1	6100	0.066	1	6100	0.082
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			1.969			1.688			3.657

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL TAXIS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
06:30 - 07:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:00 - 07:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:30 - 08:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:30 - 11:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:00 - 11:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:30 - 12:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:00 - 12:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:30 - 13:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:00 - 13:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:30 - 14:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:00 - 14:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:30 - 16:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:00 - 16:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:30 - 17:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:00 - 17:30	1	<b>6100</b>	<b>0.016</b>	1	<b>6100</b>	<b>0.016</b>	1	<b>6100</b>	<b>0.032</b>
17:30 - 18:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.016			0.016			0.032

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL OGVS**

**Calculation factor: 100 sqm**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.016	1	6100	0.000	1	6100	0.016
06:30 - 07:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:00 - 07:30	1	6100	0.016	1	6100	0.016	1	6100	0.032
07:30 - 08:00	1	6100	0.033	1	6100	0.016	1	6100	0.049
08:00 - 08:30	1	6100	0.016	1	6100	0.033	1	6100	0.049
08:30 - 09:00	1	6100	0.000	1	6100	0.016	1	6100	0.016
09:00 - 09:30	1	6100	0.033	1	6100	0.016	1	6100	0.049
09:30 - 10:00	1	6100	0.033	1	6100	0.016	1	6100	0.049
10:00 - 10:30	1	6100	0.016	1	<b>6100</b>	<b>0.066</b>	1	6100	0.082
10:30 - 11:00	1	6100	0.049	1	6100	0.049	1	6100	0.098
11:00 - 11:30	1	6100	0.033	1	6100	0.016	1	6100	0.049
11:30 - 12:00	1	6100	0.033	1	6100	0.049	1	6100	0.082
12:00 - 12:30	1	6100	0.016	1	6100	0.000	1	6100	0.016
12:30 - 13:00	1	6100	0.000	1	6100	0.033	1	6100	0.033
13:00 - 13:30	1	6100	0.033	1	6100	0.000	1	6100	0.033
13:30 - 14:00	1	6100	0.033	1	6100	0.033	1	6100	0.066
14:00 - 14:30	1	6100	0.000	1	6100	0.049	1	6100	0.049
14:30 - 15:00	1	<b>6100</b>	<b>0.066</b>	1	6100	0.049	1	<b>6100</b>	<b>0.115</b>
15:00 - 15:30	1	6100	0.000	1	6100	0.016	1	6100	0.016
15:30 - 16:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:00 - 16:30	1	6100	0.016	1	6100	0.000	1	6100	0.016
16:30 - 17:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:00 - 17:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:30 - 18:00	1	6100	0.016	1	6100	0.000	1	6100	0.016
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.458			0.473			0.931

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.



**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL PSVS**

**Calculation factor: 100 sqm**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
06:30 - 07:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:00 - 07:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:30 - 08:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:30 - 11:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:00 - 11:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:30 - 12:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:00 - 12:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:30 - 13:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:00 - 13:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:30 - 14:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:00 - 14:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:30 - 16:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:00 - 16:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:30 - 17:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:00 - 17:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:30 - 18:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.000			0.000			0.000

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL CYCLISTS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
06:30 - 07:00	<b>1</b>	<b>6100</b>	<b>0.098</b>	1	6100	0.000	1	6100	0.098
07:00 - 07:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:30 - 08:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.000	1	6100	0.016	1	6100	0.016
10:30 - 11:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:00 - 11:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:30 - 12:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:00 - 12:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:30 - 13:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:00 - 13:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:30 - 14:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:00 - 14:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.000	1	6100	0.016	1	6100	0.016
15:30 - 16:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:00 - 16:30	1	6100	0.016	1	6100	0.000	1	6100	0.016
16:30 - 17:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:00 - 17:30	1	6100	0.016	<b>1</b>	<b>6100</b>	<b>0.098</b>	<b>1</b>	<b>6100</b>	<b>0.114</b>
17:30 - 18:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.130			0.130			0.260

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL VEHICLE OCCUPANTS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.131	1	6100	0.000	1	6100	0.131
06:30 - 07:00	<b>1</b>	<b>6100</b>	<b>0.492</b>	1	6100	0.000	<b>1</b>	<b>6100</b>	<b>0.492</b>
07:00 - 07:30	1	6100	0.115	1	6100	0.148	1	6100	0.263
07:30 - 08:00	1	6100	0.098	1	6100	0.049	1	6100	0.147
08:00 - 08:30	1	6100	0.033	1	6100	0.049	1	6100	0.082
08:30 - 09:00	1	6100	0.082	1	6100	0.016	1	6100	0.098
09:00 - 09:30	1	6100	0.082	1	6100	0.082	1	6100	0.164
09:30 - 10:00	1	6100	0.082	1	6100	0.016	1	6100	0.098
10:00 - 10:30	1	6100	0.131	1	6100	0.115	1	6100	0.246
10:30 - 11:00	1	6100	0.066	1	6100	0.115	1	6100	0.181
11:00 - 11:30	1	6100	0.082	1	6100	0.033	1	6100	0.115
11:30 - 12:00	1	6100	0.033	1	6100	0.098	1	6100	0.131
12:00 - 12:30	1	6100	0.033	1	6100	0.016	1	6100	0.049
12:30 - 13:00	1	6100	0.000	1	6100	0.066	1	6100	0.066
13:00 - 13:30	1	6100	0.033	1	6100	0.082	1	6100	0.115
13:30 - 14:00	1	6100	0.082	1	6100	0.049	1	6100	0.131
14:00 - 14:30	1	6100	0.016	1	6100	0.066	1	6100	0.082
14:30 - 15:00	1	6100	0.098	1	6100	0.098	1	6100	0.196
15:00 - 15:30	1	6100	0.082	1	6100	0.049	1	6100	0.131
15:30 - 16:00	1	6100	0.066	1	6100	0.016	1	6100	0.082
16:00 - 16:30	1	6100	0.164	1	6100	0.082	1	6100	0.246
16:30 - 17:00	1	6100	0.230	1	6100	0.049	1	6100	0.279
17:00 - 17:30	1	6100	0.016	<b>1</b>	<b>6100</b>	<b>0.443</b>	1	6100	0.459
17:30 - 18:00	1	6100	0.016	1	6100	0.131	1	6100	0.147
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			2.263			1.868			4.131

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.



**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

**MULTI-MODAL PEDESTRIANS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.164	1	6100	0.000	1	6100	0.164
06:30 - 07:00	<b>1</b>	<b>6100</b>	<b>1.295</b>	1	6100	0.098	1	6100	1.393
07:00 - 07:30	1	6100	0.033	1	6100	0.049	1	6100	0.082
07:30 - 08:00	1	6100	0.033	1	6100	0.000	1	6100	0.033
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.049	1	6100	0.033	1	6100	0.082
10:30 - 11:00	1	6100	0.033	1	6100	0.000	1	6100	0.033
11:00 - 11:30	1	6100	0.115	1	6100	0.082	1	6100	0.197
11:30 - 12:00	1	6100	0.066	1	6100	0.016	1	6100	0.082
12:00 - 12:30	1	6100	0.016	1	6100	0.016	1	6100	0.032
12:30 - 13:00	1	6100	0.033	1	6100	0.049	1	6100	0.082
13:00 - 13:30	1	6100	0.000	1	6100	0.049	1	6100	0.049
13:30 - 14:00	1	6100	0.066	1	6100	0.000	1	6100	0.066
14:00 - 14:30	1	6100	0.033	1	6100	0.000	1	6100	0.033
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.066	1	6100	0.016	1	6100	0.082
15:30 - 16:00	1	6100	0.082	1	6100	0.033	1	6100	0.115
16:00 - 16:30	1	6100	0.328	1	6100	0.016	1	6100	0.344
16:30 - 17:00	1	6100	1.033	1	6100	0.033	1	6100	1.066
17:00 - 17:30	1	6100	0.016	<b>1</b>	<b>6100</b>	<b>1.918</b>	<b>1</b>	<b>6100</b>	<b>1.934</b>
17:30 - 18:00	1	6100	0.000	1	6100	0.033	1	6100	0.033
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			3.461			2.441			5.902

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

**MULTI-MODAL BUS/ TRAM PASSENGERS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.148	1	6100	0.000	1	6100	0.148
06:30 - 07:00	<b>1</b>	<b>6100</b>	<b>0.279</b>	1	6100	0.000	1	6100	0.279
07:00 - 07:30	1	6100	0.033	1	6100	0.000	1	6100	0.033
07:30 - 08:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:30 - 11:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:00 - 11:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:30 - 12:00	1	6100	0.016	1	6100	0.000	1	6100	0.016
12:00 - 12:30	1	6100	0.016	1	6100	0.000	1	6100	0.016
12:30 - 13:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:00 - 13:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:30 - 14:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:00 - 14:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.000	1	6100	0.016	1	6100	0.016
15:30 - 16:00	1	6100	0.000	1	6100	0.033	1	6100	0.033
16:00 - 16:30	1	6100	0.049	1	6100	0.000	1	6100	0.049
16:30 - 17:00	1	6100	0.049	1	6100	0.000	1	6100	0.049
17:00 - 17:30	1	6100	0.000	<b>1</b>	<b>6100</b>	<b>0.574</b>	<b>1</b>	<b>6100</b>	<b>0.574</b>
17:30 - 18:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.590			0.623			1.213

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL TOTAL RAIL PASSENGERS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	<b>1</b>	<b>6100</b>	<b>0.033</b>	<b>1</b>	<b>6100</b>	<b>0.000</b>	<b>1</b>	<b>6100</b>	<b>0.033</b>
06:30 - 07:00	1	6100	0.033	1	6100	0.000	1	6100	0.033
07:00 - 07:30	1	6100	0.033	1	6100	0.016	1	6100	0.049
07:30 - 08:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.016	1	6100	0.000	1	6100	0.016
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:30 - 11:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:00 - 11:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:30 - 12:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:00 - 12:30	1	6100	0.016	1	6100	0.000	1	6100	0.016
12:30 - 13:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:00 - 13:30	1	6100	0.000	1	6100	0.016	1	6100	0.016
13:30 - 14:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:00 - 14:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:30 - 16:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:00 - 16:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:30 - 17:00	1	6100	0.016	1	6100	0.000	1	6100	0.016
17:00 - 17:30	1	6100	0.000	<b>1</b>	<b>6100</b>	<b>0.115</b>	<b>1</b>	<b>6100</b>	<b>0.115</b>
17:30 - 18:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.147			0.147			0.294

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*



TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL COACH PASSENGERS**

**Calculation factor: 100 sqm**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
06:30 - 07:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:00 - 07:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:30 - 08:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:30 - 11:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:00 - 11:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:30 - 12:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:00 - 12:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:30 - 13:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:00 - 13:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:30 - 14:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:00 - 14:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:30 - 16:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:00 - 16:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:30 - 17:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:00 - 17:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:30 - 18:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.000			0.000			0.000

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

**MULTI-MODAL PUBLIC TRANSPORT USERS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.180	1	6100	0.000	1	6100	0.180
06:30 - 07:00	<b>1</b>	<b>6100</b>	<b>0.311</b>	1	6100	0.000	1	6100	0.311
07:00 - 07:30	1	6100	0.066	1	6100	0.016	1	6100	0.082
07:30 - 08:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.016	1	6100	0.000	1	6100	0.016
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:30 - 11:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:00 - 11:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:30 - 12:00	1	6100	0.016	1	6100	0.000	1	6100	0.016
12:00 - 12:30	1	6100	0.033	1	6100	0.000	1	6100	0.033
12:30 - 13:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:00 - 13:30	1	6100	0.000	1	6100	0.016	1	6100	0.016
13:30 - 14:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:00 - 14:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.000	1	6100	0.016	1	6100	0.016
15:30 - 16:00	1	6100	0.000	1	6100	0.033	1	6100	0.033
16:00 - 16:30	1	6100	0.049	1	6100	0.000	1	6100	0.049
16:30 - 17:00	1	6100	0.066	1	6100	0.000	1	6100	0.066
17:00 - 17:30	1	6100	0.000	<b>1</b>	<b>6100</b>	<b>0.689</b>	<b>1</b>	<b>6100</b>	<b>0.689</b>
17:30 - 18:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.737			0.770			1.507

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL TOTAL PEOPLE**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.475	1	6100	0.000	1	6100	0.475
06:30 - 07:00	<b>1</b>	<b>6100</b>	<b>2.197</b>	1	6100	0.098	1	6100	2.295
07:00 - 07:30	1	6100	0.213	1	6100	0.213	1	6100	0.426
07:30 - 08:00	1	6100	0.131	1	6100	0.049	1	6100	0.180
08:00 - 08:30	1	6100	0.033	1	6100	0.049	1	6100	0.082
08:30 - 09:00	1	6100	0.098	1	6100	0.016	1	6100	0.114
09:00 - 09:30	1	6100	0.082	1	6100	0.082	1	6100	0.164
09:30 - 10:00	1	6100	0.082	1	6100	0.016	1	6100	0.098
10:00 - 10:30	1	6100	0.180	1	6100	0.164	1	6100	0.344
10:30 - 11:00	1	6100	0.098	1	6100	0.115	1	6100	0.213
11:00 - 11:30	1	6100	0.197	1	6100	0.115	1	6100	0.312
11:30 - 12:00	1	6100	0.115	1	6100	0.115	1	6100	0.230
12:00 - 12:30	1	6100	0.082	1	6100	0.033	1	6100	0.115
12:30 - 13:00	1	6100	0.033	1	6100	0.115	1	6100	0.148
13:00 - 13:30	1	6100	0.033	1	6100	0.148	1	6100	0.181
13:30 - 14:00	1	6100	0.148	1	6100	0.049	1	6100	0.197
14:00 - 14:30	1	6100	0.049	1	6100	0.066	1	6100	0.115
14:30 - 15:00	1	6100	0.098	1	6100	0.098	1	6100	0.196
15:00 - 15:30	1	6100	0.148	1	6100	0.098	1	6100	0.246
15:30 - 16:00	1	6100	0.148	1	6100	0.082	1	6100	0.230
16:00 - 16:30	1	6100	0.557	1	6100	0.098	1	6100	0.655
16:30 - 17:00	1	6100	1.328	1	6100	0.082	1	6100	1.410
17:00 - 17:30	1	6100	0.049	<b>1</b>	<b>6100</b>	<b>3.148</b>	<b>1</b>	<b>6100</b>	<b>3.197</b>
17:30 - 18:00	1	6100	0.016	1	6100	0.164	1	6100	0.180
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			6.590			5.213			11.803

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

Calculation Reference: AUDIT-846402-160405-0457

**TRIP RATE CALCULATION SELECTION PARAMETERS:**

Land Use : 03 - RESIDENTIAL  
 Category : M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL VEHICLES**Selected regions and areas:**01 GREATER LONDON**

EG	EALING	1 days
HD	HILLINGDON	2 days

*This section displays the number of survey days per TRICS® sub-region in the selected set*

**Filtering Stage 2 selection:**

*This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.*

Parameter: Number of dwellings  
 Actual Range: 45 to 261 (units: )  
 Range Selected by User: 40 to 1751 (units: )

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/08 to 09/12/14

*This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.*

Selected survey days:

Tuesday	1 days
Thursday	2 days

*This data displays the number of selected surveys by day of the week.*

Selected survey types:

Manual count	3 days
Directional ATC Count	0 days

*This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.*

Selected Locations:

Suburban Area (PPS6 Out of Centre)	1
Neighbourhood Centre (PPS6 Local Centre)	2

*This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.*

Selected Location Sub Categories:

Residential Zone	3
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*This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.*



**Filtering Stage 3 selection:**Use Class:

C3

3 days

*This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.*

Population within 1 mile:

25,001 to 50,000

3 days

*This data displays the number of selected surveys within stated 1-mile radii of population.*

Population within 5 miles:

500,001 or More

3 days

*This data displays the number of selected surveys within stated 5-mile radii of population.*

Car ownership within 5 miles:

0.6 to 1.0

1 days

1.1 to 1.5

2 days

*This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.*

Travel Plan:

Yes

3 days

*This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.*

LIST OF SITES relevant to selection parameters

<b>1</b>	<b>EG-03-M-02</b>	<b>BLOCKS OF FLATS</b>	<b>EALING</b>
	FEATHERSTONE ROAD		
	SOUTHALL		
	Neighbourhood Centre (PPS6 Local Centre)		
	Residential Zone		
	Total Number of dwellings:		143
	Survey date: THURSDAY		17/07/14
<b>2</b>	<b>HD-03-M-01</b>	<b>BLOCK OF FLATS</b>	<b>HILLINGDON</b>
	UXBRIDGE ROAD		
	HAYES		
	Neighbourhood Centre (PPS6 Local Centre)		
	Residential Zone		
	Total Number of dwellings:		45
	Survey date: THURSDAY		11/09/14
<b>3</b>	<b>HD-03-M-03</b>	<b>TERRACED &amp; FLATS</b>	<b>HILLINGDON</b>
	JUDGE HEATH LANE		
	HAYES		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:		261
	Survey date: TUESDAY		09/12/14
			Survey Type: MANUAL

*This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.*

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
HM-03-M-01	Quantum too large

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL VEHICLES****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.065	3	150	0.178	3	150	0.243
08:00 - 09:00	3	150	0.078	<b>3</b>	<b>150</b>	<b>0.249</b>	<b>3</b>	<b>150</b>	<b>0.327</b>
09:00 - 10:00	3	150	0.076	3	150	0.109	3	150	0.185
10:00 - 11:00	3	150	0.053	3	150	0.107	3	150	0.160
11:00 - 12:00	3	150	0.076	3	150	0.060	3	150	0.136
12:00 - 13:00	3	150	0.065	3	150	0.085	3	150	0.150
13:00 - 14:00	3	150	0.076	3	150	0.091	3	150	0.167
14:00 - 15:00	3	150	0.069	3	150	0.116	3	150	0.185
15:00 - 16:00	3	150	0.163	3	150	0.122	3	150	0.285
16:00 - 17:00	3	150	0.125	3	150	0.076	3	150	0.201
17:00 - 18:00	3	150	0.165	3	150	0.089	3	150	0.254
18:00 - 19:00	<b>3</b>	<b>150</b>	<b>0.200</b>	3	150	0.096	3	150	0.296
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.211			1.378			2.589

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL TAXIS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.004	<b>3</b>	<b>150</b>	<b>0.007</b>	3	150	0.011
08:00 - 09:00	<b>3</b>	<b>150</b>	<b>0.007</b>	3	150	0.007	<b>3</b>	<b>150</b>	<b>0.014</b>
09:00 - 10:00	3	150	0.002	3	150	0.002	3	150	0.004
10:00 - 11:00	3	150	0.000	3	150	0.000	3	150	0.000
11:00 - 12:00	3	150	0.000	3	150	0.000	3	150	0.000
12:00 - 13:00	3	150	0.002	3	150	0.002	3	150	0.004
13:00 - 14:00	3	150	0.002	3	150	0.002	3	150	0.004
14:00 - 15:00	3	150	0.002	3	150	0.002	3	150	0.004
15:00 - 16:00	3	150	0.000	3	150	0.000	3	150	0.000
16:00 - 17:00	3	150	0.000	3	150	0.000	3	150	0.000
17:00 - 18:00	3	150	0.004	3	150	0.004	3	150	0.008
18:00 - 19:00	3	150	0.004	3	150	0.004	3	150	0.008
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.027			0.030			0.057

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL OGVS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.000	3	150	0.000	3	150	0.000
08:00 - 09:00	<b>3</b>	<b>150</b>	<b>0.004</b>	<b>3</b>	<b>150</b>	<b>0.004</b>	<b>3</b>	<b>150</b>	<b>0.008</b>
09:00 - 10:00	3	150	0.000	3	150	0.000	3	150	0.000
10:00 - 11:00	3	150	0.004	3	150	0.002	3	150	0.006
11:00 - 12:00	3	150	0.000	3	150	0.002	3	150	0.002
12:00 - 13:00	3	150	0.000	3	150	0.000	3	150	0.000
13:00 - 14:00	3	150	0.004	3	150	0.004	3	150	0.008
14:00 - 15:00	3	150	0.000	3	150	0.000	3	150	0.000
15:00 - 16:00	3	150	0.000	3	150	0.000	3	150	0.000
16:00 - 17:00	3	150	0.000	3	150	0.000	3	150	0.000
17:00 - 18:00	3	150	0.000	3	150	0.000	3	150	0.000
18:00 - 19:00	3	150	0.000	3	150	0.000	3	150	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.012			0.012			0.024

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL PSVS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	<b>3</b>	<b>150</b>	<b>0.004</b>	<b>3</b>	<b>150</b>	<b>0.004</b>	<b>3</b>	<b>150</b>	<b>0.008</b>
08:00 - 09:00	3	150	0.000	3	150	0.000	3	150	0.000
09:00 - 10:00	3	150	0.000	3	150	0.000	3	150	0.000
10:00 - 11:00	3	150	0.000	3	150	0.000	3	150	0.000
11:00 - 12:00	3	150	0.000	3	150	0.000	3	150	0.000
12:00 - 13:00	3	150	0.000	3	150	0.000	3	150	0.000
13:00 - 14:00	3	150	0.002	3	150	0.002	3	150	0.004
14:00 - 15:00	3	150	0.000	3	150	0.000	3	150	0.000
15:00 - 16:00	3	150	0.000	3	150	0.000	3	150	0.000
16:00 - 17:00	3	150	0.000	3	150	0.000	3	150	0.000
17:00 - 18:00	3	150	0.002	3	150	0.002	3	150	0.004
18:00 - 19:00	3	150	0.000	3	150	0.000	3	150	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.008			0.008			0.016

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL CYCLISTS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.000	<b>3</b>	<b>150</b>	<b>0.004</b>	3	150	0.004
08:00 - 09:00	3	150	0.000	3	150	0.004	3	150	0.004
09:00 - 10:00	3	150	0.000	3	150	0.000	3	150	0.000
10:00 - 11:00	3	150	0.000	3	150	0.000	3	150	0.000
11:00 - 12:00	3	150	0.000	3	150	0.000	3	150	0.000
12:00 - 13:00	3	150	0.000	3	150	0.002	3	150	0.002
13:00 - 14:00	3	150	0.000	3	150	0.000	3	150	0.000
14:00 - 15:00	3	150	0.002	3	150	0.000	3	150	0.002
15:00 - 16:00	3	150	0.002	3	150	0.000	3	150	0.002
16:00 - 17:00	3	150	0.002	3	150	0.002	3	150	0.004
17:00 - 18:00	<b>3</b>	<b>150</b>	<b>0.009</b>	3	150	0.002	<b>3</b>	<b>150</b>	<b>0.011</b>
18:00 - 19:00	3	150	0.000	3	150	0.002	3	150	0.002
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.015			0.016			0.031

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.



TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL VEHICLE OCCUPANTS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.076	3	150	0.305	3	150	0.381
08:00 - 09:00	3	150	0.100	<b>3</b>	<b>150</b>	<b>0.399</b>	<b>3</b>	<b>150</b>	<b>0.499</b>
09:00 - 10:00	3	150	0.100	3	150	0.129	3	150	0.229
10:00 - 11:00	3	150	0.058	3	150	0.131	3	150	0.189
11:00 - 12:00	3	150	0.091	3	150	0.065	3	150	0.156
12:00 - 13:00	3	150	0.073	3	150	0.096	3	150	0.169
13:00 - 14:00	3	150	0.082	3	150	0.105	3	150	0.187
14:00 - 15:00	3	150	0.073	3	150	0.156	3	150	0.229
15:00 - 16:00	<b>3</b>	<b>150</b>	<b>0.294</b>	3	150	0.171	3	150	0.465
16:00 - 17:00	3	150	0.183	3	150	0.116	3	150	0.299
17:00 - 18:00	3	150	0.245	3	150	0.107	3	150	0.352
18:00 - 19:00	3	150	0.281	3	150	0.122	3	150	0.403
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.656			1.902			3.558

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL PEDESTRIANS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.004	3	150	0.067	3	150	0.071
08:00 - 09:00	3	150	0.029	<b>3</b>	<b>150</b>	<b>0.301</b>	<b>3</b>	<b>150</b>	<b>0.330</b>
09:00 - 10:00	3	150	0.091	3	150	0.051	3	150	0.142
10:00 - 11:00	3	150	0.029	3	150	0.020	3	150	0.049
11:00 - 12:00	3	150	0.036	3	150	0.073	3	150	0.109
12:00 - 13:00	3	150	0.067	3	150	0.049	3	150	0.116
13:00 - 14:00	3	150	0.038	3	150	0.036	3	150	0.074
14:00 - 15:00	3	150	0.053	3	150	0.094	3	150	0.147
15:00 - 16:00	<b>3</b>	<b>150</b>	<b>0.167</b>	3	150	0.020	3	150	0.187
16:00 - 17:00	3	150	0.102	3	150	0.040	3	150	0.142
17:00 - 18:00	3	150	0.045	3	150	0.042	3	150	0.087
18:00 - 19:00	3	150	0.082	3	150	0.036	3	150	0.118
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.743			0.829			1.572

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL BUS/ TRAM PASSENGERS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.004	3	150	0.094	3	150	0.098
08:00 - 09:00	3	150	0.011	<b>3</b>	<b>150</b>	<b>0.149</b>	<b>3</b>	<b>150</b>	<b>0.160</b>
09:00 - 10:00	3	150	0.038	3	150	0.027	3	150	0.065
10:00 - 11:00	3	150	0.011	3	150	0.013	3	150	0.024
11:00 - 12:00	3	150	0.013	3	150	0.022	3	150	0.035
12:00 - 13:00	3	150	0.024	3	150	0.020	3	150	0.044
13:00 - 14:00	3	150	0.020	3	150	0.018	3	150	0.038
14:00 - 15:00	3	150	0.016	3	150	0.022	3	150	0.038
15:00 - 16:00	<b>3</b>	<b>150</b>	<b>0.069</b>	3	150	0.013	3	150	0.082
16:00 - 17:00	3	150	0.058	3	150	0.007	3	150	0.065
17:00 - 18:00	3	150	0.036	3	150	0.002	3	150	0.038
18:00 - 19:00	3	150	0.058	3	150	0.002	3	150	0.060
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.358			0.389			0.747

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL TOTAL RAIL PASSENGERS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.000	<b>3</b>	<b>150</b>	<b>0.042</b>	3	150	0.042
08:00 - 09:00	3	150	0.002	3	150	0.042	3	150	0.044
09:00 - 10:00	3	150	0.000	3	150	0.011	3	150	0.011
10:00 - 11:00	3	150	0.002	3	150	0.007	3	150	0.009
11:00 - 12:00	3	150	0.011	3	150	0.007	3	150	0.018
12:00 - 13:00	3	150	0.004	3	150	0.009	3	150	0.013
13:00 - 14:00	3	150	0.007	3	150	0.007	3	150	0.014
14:00 - 15:00	3	150	0.007	3	150	0.007	3	150	0.014
15:00 - 16:00	3	150	0.011	3	150	0.004	3	150	0.015
16:00 - 17:00	3	150	0.029	3	150	0.002	3	150	0.031
17:00 - 18:00	<b>3</b>	<b>150</b>	<b>0.047</b>	3	150	0.004	<b>3</b>	<b>150</b>	<b>0.051</b>
18:00 - 19:00	3	150	0.031	3	150	0.002	3	150	0.033
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.151			0.144			0.295

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL COACH PASSENGERS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.000	3	150	0.000	3	150	0.000
08:00 - 09:00	3	150	0.000	3	150	0.000	3	150	0.000
09:00 - 10:00	3	150	0.000	3	150	0.000	3	150	0.000
10:00 - 11:00	3	150	0.000	3	150	0.000	3	150	0.000
11:00 - 12:00	3	150	0.000	3	150	0.000	3	150	0.000
12:00 - 13:00	3	150	0.000	3	150	0.000	3	150	0.000
13:00 - 14:00	3	150	0.000	3	150	0.000	3	150	0.000
14:00 - 15:00	3	150	0.000	3	150	0.000	3	150	0.000
15:00 - 16:00	3	150	0.000	3	150	0.000	3	150	0.000
16:00 - 17:00	3	150	0.000	3	150	0.000	3	150	0.000
17:00 - 18:00	3	150	0.000	3	150	0.000	3	150	0.000
18:00 - 19:00	3	150	0.000	3	150	0.000	3	150	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.000			0.000			0.000

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL PUBLIC TRANSPORT USERS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.004	3	150	0.136	3	150	0.140
08:00 - 09:00	3	150	0.013	<b>3</b>	<b>150</b>	<b>0.192</b>	<b>3</b>	<b>150</b>	<b>0.205</b>
09:00 - 10:00	3	150	0.038	3	150	0.038	3	150	0.076
10:00 - 11:00	3	150	0.013	3	150	0.020	3	150	0.033
11:00 - 12:00	3	150	0.024	3	150	0.029	3	150	0.053
12:00 - 13:00	3	150	0.029	3	150	0.029	3	150	0.058
13:00 - 14:00	3	150	0.027	3	150	0.024	3	150	0.051
14:00 - 15:00	3	150	0.022	3	150	0.029	3	150	0.051
15:00 - 16:00	3	150	0.080	3	150	0.018	3	150	0.098
16:00 - 17:00	3	150	0.087	3	150	0.009	3	150	0.096
17:00 - 18:00	3	150	0.082	3	150	0.007	3	150	0.089
18:00 - 19:00	<b>3</b>	<b>150</b>	<b>0.089</b>	3	150	0.004	3	150	0.093
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.508			0.535			1.043

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL TOTAL PEOPLE****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.085	3	150	0.512	3	150	0.597
08:00 - 09:00	3	150	0.143	<b>3</b>	<b>150</b>	<b>0.895</b>	<b>3</b>	<b>150</b>	<b>1.038</b>
09:00 - 10:00	3	150	0.229	3	150	0.218	3	150	0.447
10:00 - 11:00	3	150	0.100	3	150	0.171	3	150	0.271
11:00 - 12:00	3	150	0.151	3	150	0.167	3	150	0.318
12:00 - 13:00	3	150	0.169	3	150	0.176	3	150	0.345
13:00 - 14:00	3	150	0.147	3	150	0.165	3	150	0.312
14:00 - 15:00	3	150	0.151	3	150	0.278	3	150	0.429
15:00 - 16:00	<b>3</b>	<b>150</b>	<b>0.543</b>	3	150	0.209	3	150	0.752
16:00 - 17:00	3	150	0.374	3	150	0.167	3	150	0.541
17:00 - 18:00	3	150	0.381	3	150	0.158	3	150	0.539
18:00 - 19:00	3	150	0.452	3	150	0.165	3	150	0.617
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.925			3.281			6.206

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.



Calculation Reference: AUDIT-846402-160405-0407

## TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT  
Category : A - OFFICE

### MULTI-MODAL VEHICLES

#### Selected regions and areas:

#### 01 GREATER LONDON

BT	BRENT	1 days
IS	ISLINGTON	1 days
SK	SOUTHWARK	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

## Filtering Stage 2 selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Gross floor area  
Actual Range: 2371 to 5500 (units: sqm)  
Range Selected by User: 408 to 5000 (units: sqm)

#### Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/08 to 19/05/15

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

#### Selected survey days:

Monday	1 days
Tuesday	1 days
Friday	1 days

This data displays the number of selected surveys by day of the week.

#### Selected survey types:

Manual count	3 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

#### Selected Locations:

Edge of Town Centre	1
Suburban Area (PPS6 Out of Centre)	2

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

#### Selected Location Sub Categories:

Commercial Zone	1
Built-Up Zone	2

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

### Filtering Stage 3 selection:

#### Use Class:

B1 3 days

*This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.*

#### Population within 1 mile:

25,001 to 50,000 1 days

50,001 to 100,000 1 days

101,000 or More 1 days

*This data displays the number of selected surveys within stated 1-mile radii of population.*

#### Population within 5 miles:

500,001 or More 3 days

*This data displays the number of selected surveys within stated 5-mile radii of population.*

#### Car ownership within 5 miles:

0.5 or Less 2 days

0.6 to 1.0 1 days

*This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.*

#### Travel Plan:

No 3 days

*This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.*

LIST OF SITES relevant to selection parameters

<b>1</b>	<b>BT-02-A-02</b>	<b>OFFICE</b>	<b>BRENT</b>
	WEMBLEY HILL ROAD		
	WEMBLEY		
	Suburban Area (PPS6 Out of Centre)		
	Built-Up Zone		
	Total Gross floor area:	4750 sqm	
	Survey date: TUESDAY	22/06/10	Survey Type: MANUAL
<b>2</b>	<b>IS-02-A-01</b>	<b>OFFICES</b>	<b>ISLINGTON</b>
	ESSEX ROAD		
	ISLINGTON		
	Suburban Area (PPS6 Out of Centre)		
	Built-Up Zone		
	Total Gross floor area:	5500 sqm	
	Survey date: FRIDAY	24/10/08	Survey Type: MANUAL
<b>3</b>	<b>SK-02-A-02</b>	<b>OFFICES</b>	<b>SOUTHWARK</b>
	ST OLAV'S COURT		
	ROTHERHITHE		
	Edge of Town Centre		
	Commercial Zone		
	Total Gross floor area:	2371 sqm	
	Survey date: MONDAY	20/10/08	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
CN-02-A-01	Too central
HD-02-A-07	GFA too large

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

# **MULTI-MODAL VEHICLES**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.055	3	4207	0.032	3	4207	0.087
07:30 - 08:00	3	4207	0.246	3	4207	0.032	3	4207	0.278
08:00 - 08:30	3	4207	0.222	3	4207	0.048	3	4207	0.270
08:30 - 09:00	3	4207	0.222	3	4207	0.048	3	4207	0.270
09:00 - 09:30	3	4207	0.269	3	4207	0.087	3	4207	0.356
09:30 - 10:00	<b>3</b>	<b>4207</b>	<b>0.325</b>	3	4207	0.119	<b>3</b>	<b>4207</b>	<b>0.444</b>
10:00 - 10:30	3	4207	0.309	3	4207	0.127	3	4207	0.436
10:30 - 11:00	3	4207	0.158	3	4207	0.151	3	4207	0.309
11:00 - 11:30	3	4207	0.151	3	4207	0.158	3	4207	0.309
11:30 - 12:00	3	4207	0.111	3	4207	0.071	3	4207	0.182
12:00 - 12:30	3	4207	0.158	3	4207	0.182	3	4207	0.340
12:30 - 13:00	3	4207	0.151	3	4207	0.182	3	4207	0.333
13:00 - 13:30	3	4207	0.119	3	4207	0.182	3	4207	0.301
13:30 - 14:00	3	4207	0.071	3	4207	0.071	3	4207	0.142
14:00 - 14:30	3	4207	0.206	3	4207	0.151	3	4207	0.357
14:30 - 15:00	3	4207	0.182	3	4207	0.103	3	4207	0.285
15:00 - 15:30	3	4207	0.119	3	4207	0.166	3	4207	0.285
15:30 - 16:00	3	4207	0.119	3	4207	0.119	3	4207	0.238
16:00 - 16:30	3	4207	0.087	3	4207	0.222	3	4207	0.309
16:30 - 17:00	3	4207	0.087	3	4207	0.190	3	4207	0.277
17:00 - 17:30	3	4207	0.095	<b>3</b>	<b>4207</b>	<b>0.293</b>	3	4207	0.388
17:30 - 18:00	3	4207	0.048	3	4207	0.174	3	4207	0.222
18:00 - 18:30	3	4207	0.079	3	4207	0.222	3	4207	0.301
18:30 - 19:00	3	4207	0.016	3	4207	0.111	3	4207	0.127
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			3.605			3.241			6.846

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

**MULTI-MODAL TAXIS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	<b>3</b>	<b>4207</b>	<b>0.008</b>	<b>3</b>	<b>4207</b>	<b>0.008</b>	<b>3</b>	<b>4207</b>	<b>0.016</b>
07:30 - 08:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
08:00 - 08:30	3	4207	0.008	3	4207	0.008	3	4207	0.016
08:30 - 09:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
09:00 - 09:30	3	4207	0.008	3	4207	0.008	3	4207	0.016
09:30 - 10:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
10:00 - 10:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
10:30 - 11:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
11:00 - 11:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
11:30 - 12:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
12:00 - 12:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
12:30 - 13:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
13:00 - 13:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
13:30 - 14:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:00 - 14:30	3	4207	0.008	3	4207	0.008	3	4207	0.016
14:30 - 15:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
15:00 - 15:30	3	4207	0.008	3	4207	0.008	3	4207	0.016
15:30 - 16:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
16:00 - 16:30	3	4207	0.008	3	4207	0.008	3	4207	0.016
16:30 - 17:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
17:00 - 17:30	3	4207	0.008	3	4207	0.008	3	4207	0.016
17:30 - 18:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
18:00 - 18:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
18:30 - 19:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.104			0.104			0.208

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*



TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

**MULTI-MODAL OGVS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
07:30 - 08:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
08:00 - 08:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
08:30 - 09:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
09:00 - 09:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
09:30 - 10:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
10:00 - 10:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
10:30 - 11:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
11:00 - 11:30	<b>3</b>	<b>4207</b>	<b>0.008</b>	3	4207	0.000	3	4207	0.008
11:30 - 12:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
12:00 - 12:30	3	4207	0.000	<b>3</b>	<b>4207</b>	<b>0.008</b>	3	4207	0.008
12:30 - 13:00	3	4207	0.008	3	4207	0.008	<b>3</b>	<b>4207</b>	<b>0.016</b>
13:00 - 13:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
13:30 - 14:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:00 - 14:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:30 - 15:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
15:00 - 15:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
15:30 - 16:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
16:00 - 16:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
16:30 - 17:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
17:00 - 17:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
17:30 - 18:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
18:00 - 18:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
18:30 - 19:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.024			0.024			0.048

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

**MULTI-MODAL PSVS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
07:30 - 08:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
08:00 - 08:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
08:30 - 09:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
09:00 - 09:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
09:30 - 10:00	<b>3</b>	<b>4207</b>	<b>0.008</b>	<b>3</b>	<b>4207</b>	<b>0.008</b>	<b>3</b>	<b>4207</b>	<b>0.016</b>
10:00 - 10:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
10:30 - 11:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
11:00 - 11:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
11:30 - 12:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
12:00 - 12:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
12:30 - 13:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
13:00 - 13:30	3	4207	0.008	3	4207	0.008	3	4207	0.016
13:30 - 14:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:00 - 14:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:30 - 15:00	3	4207	0.008	3	4207	0.000	3	4207	0.008
15:00 - 15:30	3	4207	0.000	3	4207	0.008	3	4207	0.008
15:30 - 16:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
16:00 - 16:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
16:30 - 17:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
17:00 - 17:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
17:30 - 18:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
18:00 - 18:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
18:30 - 19:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.024			0.024			0.048

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

# **MULTI-MODAL CYCLISTS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
07:30 - 08:00	3	4207	0.008	3	4207	0.000	3	4207	0.008
08:00 - 08:30	3	4207	0.016	3	4207	0.000	3	4207	0.016
08:30 - 09:00	3	4207	0.000	3	4207	0.008	3	4207	0.008
09:00 - 09:30	<b>3</b>	<b>4207</b>	<b>0.024</b>	3	4207	0.000	3	4207	0.024
09:30 - 10:00	3	4207	0.024	3	4207	0.000	3	4207	0.024
10:00 - 10:30	3	4207	0.000	3	4207	0.008	3	4207	0.008
10:30 - 11:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
11:00 - 11:30	3	4207	0.000	3	4207	0.008	3	4207	0.008
11:30 - 12:00	3	4207	0.016	3	4207	0.008	3	4207	0.024
12:00 - 12:30	3	4207	0.000	3	4207	0.008	3	4207	0.008
12:30 - 13:00	3	4207	0.016	3	4207	0.008	3	4207	0.024
13:00 - 13:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
13:30 - 14:00	3	4207	0.000	3	4207	0.008	3	4207	0.008
14:00 - 14:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:30 - 15:00	3	4207	0.008	3	4207	0.000	3	4207	0.008
15:00 - 15:30	3	4207	0.016	3	4207	0.024	3	4207	0.040
15:30 - 16:00	3	4207	0.008	3	4207	0.016	3	4207	0.024
16:00 - 16:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
16:30 - 17:00	3	4207	0.008	3	4207	0.000	3	4207	0.008
17:00 - 17:30	3	4207	0.000	<b>3</b>	<b>4207</b>	<b>0.048</b>	<b>3</b>	<b>4207</b>	<b>0.048</b>
17:30 - 18:00	3	4207	0.000	3	4207	0.032	3	4207	0.032
18:00 - 18:30	3	4207	0.008	3	4207	0.000	3	4207	0.008
18:30 - 19:00	3	4207	0.008	3	4207	0.016	3	4207	0.024
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.168			0.200			0.368

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

**MULTI-MODAL VEHICLE OCCUPANTS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.055	3	4207	0.032	3	4207	0.087
07:30 - 08:00	3	4207	0.261	3	4207	0.032	3	4207	0.293
08:00 - 08:30	3	4207	0.277	3	4207	0.071	3	4207	0.348
08:30 - 09:00	3	4207	0.238	3	4207	0.040	3	4207	0.278
09:00 - 09:30	3	4207	0.341	3	4207	0.095	3	4207	0.436
09:30 - 10:00	<b>3</b>	<b>4207</b>	<b>0.396</b>	3	4207	0.111	3	4207	0.507
10:00 - 10:30	3	4207	0.372	3	4207	0.151	3	4207	0.523
10:30 - 11:00	3	4207	0.198	3	4207	0.151	3	4207	0.349
11:00 - 11:30	3	4207	0.261	3	4207	0.230	3	4207	0.491
11:30 - 12:00	3	4207	0.135	3	4207	0.087	3	4207	0.222
12:00 - 12:30	3	4207	0.190	3	4207	0.230	3	4207	0.420
12:30 - 13:00	3	4207	0.206	3	4207	0.246	3	4207	0.452
13:00 - 13:30	3	4207	0.151	3	4207	0.214	3	4207	0.365
13:30 - 14:00	3	4207	0.087	3	4207	0.095	3	4207	0.182
14:00 - 14:30	3	4207	0.269	3	4207	0.174	3	4207	0.443
14:30 - 15:00	3	4207	0.206	3	4207	0.127	3	4207	0.333
15:00 - 15:30	3	4207	0.151	3	4207	0.230	3	4207	0.381
15:30 - 16:00	3	4207	0.166	3	4207	0.174	3	4207	0.340
16:00 - 16:30	3	4207	0.111	3	4207	0.277	3	4207	0.388
16:30 - 17:00	3	4207	0.103	3	4207	0.254	3	4207	0.357
17:00 - 17:30	3	4207	0.143	<b>3</b>	<b>4207</b>	<b>0.412</b>	<b>3</b>	<b>4207</b>	<b>0.555</b>
17:30 - 18:00	3	4207	0.055	3	4207	0.277	3	4207	0.332
18:00 - 18:30	3	4207	0.087	3	4207	0.317	3	4207	0.404
18:30 - 19:00	3	4207	0.016	3	4207	0.158	3	4207	0.174
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			4.475			4.185			8.660

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.



### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

# **MULTI-MODAL PEDESTRIANS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.016	3	4207	0.000	3	4207	0.016
07:30 - 08:00	3	4207	0.040	3	4207	0.008	3	4207	0.048
08:00 - 08:30	3	4207	0.087	3	4207	0.008	3	4207	0.095
08:30 - 09:00	3	4207	0.230	3	4207	0.048	3	4207	0.278
09:00 - 09:30	3	4207	0.198	3	4207	0.087	3	4207	0.285
09:30 - 10:00	3	4207	0.206	3	4207	0.119	3	4207	0.325
10:00 - 10:30	3	4207	0.158	3	4207	0.087	3	4207	0.245
10:30 - 11:00	3	4207	0.166	3	4207	0.222	3	4207	0.388
11:00 - 11:30	3	4207	0.111	3	4207	0.087	3	4207	0.198
11:30 - 12:00	3	4207	0.103	3	4207	0.190	3	4207	0.293
12:00 - 12:30	3	4207	0.349	<b>3</b>	<b>4207</b>	<b>0.737</b>	3	4207	1.086
12:30 - 13:00	3	4207	0.364	3	4207	0.578	3	4207	0.942
13:00 - 13:30	3	4207	0.563	3	4207	0.634	<b>3</b>	<b>4207</b>	<b>1.197</b>
13:30 - 14:00	<b>3</b>	<b>4207</b>	<b>0.650</b>	3	4207	0.301	3	4207	0.951
14:00 - 14:30	3	4207	0.467	3	4207	0.222	3	4207	0.689
14:30 - 15:00	3	4207	0.285	3	4207	0.063	3	4207	0.348
15:00 - 15:30	3	4207	0.151	3	4207	0.111	3	4207	0.262
15:30 - 16:00	3	4207	0.325	3	4207	0.230	3	4207	0.555
16:00 - 16:30	3	4207	0.166	3	4207	0.087	3	4207	0.253
16:30 - 17:00	3	4207	0.151	3	4207	0.095	3	4207	0.246
17:00 - 17:30	3	4207	0.087	3	4207	0.166	3	4207	0.253
17:30 - 18:00	3	4207	0.032	3	4207	0.158	3	4207	0.190
18:00 - 18:30	3	4207	0.032	3	4207	0.032	3	4207	0.064
18:30 - 19:00	3	4207	0.032	3	4207	0.032	3	4207	0.064
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			4.969			4.302			9.271

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

**MULTI-MODAL BUS/ TRAM PASSENGERS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
07:30 - 08:00	3	4207	0.016	3	4207	0.000	3	4207	0.016
08:00 - 08:30	3	4207	0.071	3	4207	0.008	3	4207	0.079
08:30 - 09:00	3	4207	0.246	3	4207	0.000	3	4207	0.246
09:00 - 09:30	<b>3</b>	<b>4207</b>	<b>0.254</b>	3	4207	0.016	3	4207	0.270
09:30 - 10:00	3	4207	0.214	3	4207	0.008	3	4207	0.222
10:00 - 10:30	3	4207	0.190	3	4207	0.063	3	4207	0.253
10:30 - 11:00	3	4207	0.174	3	4207	0.040	3	4207	0.214
11:00 - 11:30	3	4207	0.071	3	4207	0.063	3	4207	0.134
11:30 - 12:00	3	4207	0.095	3	4207	0.048	3	4207	0.143
12:00 - 12:30	3	4207	0.063	3	4207	0.111	3	4207	0.174
12:30 - 13:00	3	4207	0.048	3	4207	0.079	3	4207	0.127
13:00 - 13:30	3	4207	0.127	3	4207	0.119	3	4207	0.246
13:30 - 14:00	3	4207	0.087	3	4207	0.079	3	4207	0.166
14:00 - 14:30	3	4207	0.095	3	4207	0.071	3	4207	0.166
14:30 - 15:00	3	4207	0.127	3	4207	0.119	3	4207	0.246
15:00 - 15:30	3	4207	0.071	3	4207	0.071	3	4207	0.142
15:30 - 16:00	3	4207	0.048	3	4207	0.079	3	4207	0.127
16:00 - 16:30	3	4207	0.048	<b>3</b>	<b>4207</b>	<b>0.238</b>	<b>3</b>	<b>4207</b>	<b>0.286</b>
16:30 - 17:00	3	4207	0.000	3	4207	0.135	3	4207	0.135
17:00 - 17:30	3	4207	0.000	3	4207	0.222	3	4207	0.222
17:30 - 18:00	3	4207	0.008	3	4207	0.158	3	4207	0.166
18:00 - 18:30	3	4207	0.000	3	4207	0.095	3	4207	0.095
18:30 - 19:00	3	4207	0.000	3	4207	0.032	3	4207	0.032
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			2.053			1.854			3.907

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

# **MULTI-MODAL TOTAL RAIL PASSENGERS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
07:30 - 08:00	3	4207	0.103	3	4207	0.000	3	4207	0.103
08:00 - 08:30	3	4207	0.143	3	4207	0.000	3	4207	0.143
08:30 - 09:00	3	4207	0.317	3	4207	0.000	3	4207	0.317
09:00 - 09:30	<b>3</b>	<b>4207</b>	<b>0.499</b>	3	4207	0.016	<b>3</b>	<b>4207</b>	<b>0.515</b>
09:30 - 10:00	3	4207	0.254	3	4207	0.000	3	4207	0.254
10:00 - 10:30	3	4207	0.079	3	4207	0.016	3	4207	0.095
10:30 - 11:00	3	4207	0.103	3	4207	0.048	3	4207	0.151
11:00 - 11:30	3	4207	0.024	3	4207	0.016	3	4207	0.040
11:30 - 12:00	3	4207	0.024	3	4207	0.063	3	4207	0.087
12:00 - 12:30	3	4207	0.048	3	4207	0.048	3	4207	0.096
12:30 - 13:00	3	4207	0.024	3	4207	0.048	3	4207	0.072
13:00 - 13:30	3	4207	0.032	3	4207	0.016	3	4207	0.048
13:30 - 14:00	3	4207	0.055	3	4207	0.024	3	4207	0.079
14:00 - 14:30	3	4207	0.008	3	4207	0.079	3	4207	0.087
14:30 - 15:00	3	4207	0.008	3	4207	0.040	3	4207	0.048
15:00 - 15:30	3	4207	0.008	3	4207	0.024	3	4207	0.032
15:30 - 16:00	3	4207	0.071	3	4207	0.055	3	4207	0.126
16:00 - 16:30	3	4207	0.016	3	4207	0.166	3	4207	0.182
16:30 - 17:00	3	4207	0.071	3	4207	0.151	3	4207	0.222
17:00 - 17:30	3	4207	0.008	<b>3</b>	<b>4207</b>	<b>0.364</b>	3	4207	0.372
17:30 - 18:00	3	4207	0.000	3	4207	0.254	3	4207	0.254
18:00 - 18:30	3	4207	0.016	3	4207	0.174	3	4207	0.190
18:30 - 19:00	3	4207	0.008	3	4207	0.079	3	4207	0.087
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			1.919			1.681			3.600

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*



TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

# **MULTI-MODAL COACH PASSENGERS**

**Calculation factor: 100 sqm**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
07:30 - 08:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
08:00 - 08:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
08:30 - 09:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
09:00 - 09:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
09:30 - 10:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
10:00 - 10:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
10:30 - 11:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
11:00 - 11:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
11:30 - 12:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
12:00 - 12:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
12:30 - 13:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
13:00 - 13:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
13:30 - 14:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:00 - 14:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:30 - 15:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
15:00 - 15:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
15:30 - 16:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
16:00 - 16:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
16:30 - 17:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
17:00 - 17:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
17:30 - 18:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
18:00 - 18:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
18:30 - 19:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.000			0.000			0.000

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

**MULTI-MODAL PUBLIC TRANSPORT USERS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
07:30 - 08:00	3	4207	0.119	3	4207	0.000	3	4207	0.119
08:00 - 08:30	3	4207	0.214	3	4207	0.008	3	4207	0.222
08:30 - 09:00	3	4207	0.563	3	4207	0.000	3	4207	0.563
09:00 - 09:30	<b>3</b>	<b>4207</b>	<b>0.753</b>	3	4207	0.032	<b>3</b>	<b>4207</b>	<b>0.785</b>
09:30 - 10:00	3	4207	0.467	3	4207	0.008	3	4207	0.475
10:00 - 10:30	3	4207	0.269	3	4207	0.079	3	4207	0.348
10:30 - 11:00	3	4207	0.277	3	4207	0.087	3	4207	0.364
11:00 - 11:30	3	4207	0.095	3	4207	0.079	3	4207	0.174
11:30 - 12:00	3	4207	0.119	3	4207	0.111	3	4207	0.230
12:00 - 12:30	3	4207	0.111	3	4207	0.158	3	4207	0.269
12:30 - 13:00	3	4207	0.071	3	4207	0.127	3	4207	0.198
13:00 - 13:30	3	4207	0.158	3	4207	0.135	3	4207	0.293
13:30 - 14:00	3	4207	0.143	3	4207	0.103	3	4207	0.246
14:00 - 14:30	3	4207	0.103	3	4207	0.151	3	4207	0.254
14:30 - 15:00	3	4207	0.135	3	4207	0.158	3	4207	0.293
15:00 - 15:30	3	4207	0.079	3	4207	0.095	3	4207	0.174
15:30 - 16:00	3	4207	0.119	3	4207	0.135	3	4207	0.254
16:00 - 16:30	3	4207	0.063	3	4207	0.404	3	4207	0.467
16:30 - 17:00	3	4207	0.071	3	4207	0.285	3	4207	0.356
17:00 - 17:30	3	4207	0.008	<b>3</b>	<b>4207</b>	<b>0.586</b>	3	4207	0.594
17:30 - 18:00	3	4207	0.008	3	4207	0.412	3	4207	0.420
18:00 - 18:30	3	4207	0.016	3	4207	0.269	3	4207	0.285
18:30 - 19:00	3	4207	0.008	3	4207	0.111	3	4207	0.119
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			3.969			3.533			7.502

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

# **MULTI-MODAL TOTAL PEOPLE**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.071	3	4207	0.032	3	4207	0.103
07:30 - 08:00	3	4207	0.428	3	4207	0.040	3	4207	0.468
08:00 - 08:30	3	4207	0.594	3	4207	0.087	3	4207	0.681
08:30 - 09:00	3	4207	1.030	3	4207	0.095	3	4207	1.125
09:00 - 09:30	<b>3</b>	<b>4207</b>	<b>1.315</b>	3	4207	0.214	3	4207	1.529
09:30 - 10:00	3	4207	1.093	3	4207	0.238	3	4207	1.331
10:00 - 10:30	3	4207	0.800	3	4207	0.325	3	4207	1.125
10:30 - 11:00	3	4207	0.650	3	4207	0.467	3	4207	1.117
11:00 - 11:30	3	4207	0.467	3	4207	0.404	3	4207	0.871
11:30 - 12:00	3	4207	0.372	3	4207	0.396	3	4207	0.768
12:00 - 12:30	3	4207	0.650	3	4207	1.133	3	4207	1.783
12:30 - 13:00	3	4207	0.658	3	4207	0.959	3	4207	1.617
13:00 - 13:30	3	4207	0.872	3	4207	0.982	<b>3</b>	<b>4207</b>	<b>1.854</b>
13:30 - 14:00	3	4207	0.879	3	4207	0.507	3	4207	1.386
14:00 - 14:30	3	4207	0.840	3	4207	0.547	3	4207	1.387
14:30 - 15:00	3	4207	0.634	3	4207	0.349	3	4207	0.983
15:00 - 15:30	3	4207	0.396	3	4207	0.460	3	4207	0.856
15:30 - 16:00	3	4207	0.618	3	4207	0.555	3	4207	1.173
16:00 - 16:30	3	4207	0.341	3	4207	0.769	3	4207	1.110
16:30 - 17:00	3	4207	0.333	3	4207	0.634	3	4207	0.967
17:00 - 17:30	3	4207	0.238	<b>3</b>	<b>4207</b>	<b>1.212</b>	3	4207	1.450
17:30 - 18:00	3	4207	0.095	3	4207	0.879	3	4207	0.974
18:00 - 18:30	3	4207	0.143	3	4207	0.618	3	4207	0.761
18:30 - 19:00	3	4207	0.063	3	4207	0.317	3	4207	0.380
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:	13.580			12.219			25.799		

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

## 5 NOISE ASSESSMENT



**GREGGS BAKERY SITE  
GOULD ROAD, TWICKENHAM**

**NOISE ASSESSMENT REPORT**

**May 2016**

**Report prepared for:**

Colliers international

The EQUUS Partnership Ltd  
The Garden Office  
5 Linkfield Corner  
Redhill  
Surrey  
RH1 1BD

**Tel: 01737 778355**



## 1 INTRODUCTION

This **Noise Assessment Report** has been produced to understand the impact of the current use of the site as a bakery on the neighbouring residential properties. It then goes on to assess the acceptability of the redevelopment of the site for a mixed commercial and residential use.

This **Noise Assessment Report** presents:

- The results of noise monitoring undertaken at the site to determine existing environmental noise levels generated at the site.
- Discussion regarding the nature and intensity of the current site use, and the significance of the current site noise levels with respect to the amenity of the existing neighbouring residential properties in the context of relevant design guidance.
- Discussion of the suitability of the site with respect to the amenity of the proposed uses, and a preliminary assessment of the likely requirements for any scheme to mitigate environmental noise intrusion into the proposed development in accordance with relevant national, regional and local planning policy.

## 2 SITE DESCRIPTION

The site is located to the south of the river Crane within a predominantly residential area, and is bounded to the west and east by the gardens and rear elevations of the residential properties fronting Crane Road and Norcutt Road, respectively, and to the south by Edwin Road. The principal access to the site for lorries is to the south from Edwin Road, and there is a smaller entrance to the north end of the site at the junction of Gould Road and Crane Road which is mainly used by cars and light vehicles. Edwin Road and the other thoroughfares in the immediate vicinity of the site are narrow, residential roads with vehicles parked down both sides, and are generally not suitable to be used by large, commercial vehicles.

There are railway lines to the north of the river, approximately 20m north of the site, which have been observed to carry mostly relatively slow moving, electric passenger trains. The site is relatively close to Heathrow airport which is approximately 4km to the west, and is overflown when

## Noise Assessment Report

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the airport is on easterly operations. The operation of easterly take-off and landings is entirely weather dependent, but occurs roughly 30 percent of the time, mostly during the summer months.

Most of the northern half site is covered by large, mainly single storey industrial buildings which accommodate the various bakery processes and activities. To the south of these buildings there is a covered loading/unloading bay for lorries, accessed directly from the Edwin Road entrance. To the west the rear elevations of the residential properties in Crane Road are typically around 20m from the bakery buildings, however the rear elevations of the properties in Norcutt Road are much closer, being within approximately 5m in some cases.

At the south-west corner of the site there is another industrial building accessed from Edwin Road which is not part of the current bakery use, presently being used as an engineering works.

The location of the site and its general environs are shown on the plan attached at **Appendix A**. The site boundary is shown outlined in red, and from this plan the large number of dwellings located in very close proximity to the site can be clearly seen.

## 3 CURRENT USE

The site has been used for industrial purposes for many years, the oldest building dating back to the nineteenth century, and has been used as a bakery for more than 60 years. The bakery currently operates effectively on a 24 hour basis every day of the week. We understand that the only time that bakery processes cease is between 20.00 on Saturday and 06.00 on Sunday, but that even during this period other site activities, including the operation of some plant items and arrival and departure of lorries and other vehicles, continues. From the location plan it can be seen that the whole site is fully utilised, and it was observed in fact to be very busy and congested with, in particular, insufficient space for lorries to park and turn, which leads to the situation where lorries are frequently forced to wait in the surrounding residential streets whilst waiting for space on site to become available. Most of the lorries making deliveries and collecting product from the bakery are refrigerated, and these vehicles are generally fitted with high level fridge packs which generate significant noise levels.

Inside the bakery buildings there are various production lines and processes, some of which generate fairly high noise levels, to the extent that certain internal areas are designated Hearing Protection Zones. Most of the bakery buildings are many years old with lightweight, uninsulated

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roofs, and therefore provide little resistance to noise break-out. There are also various fans and other plant items, some of which produce significant levels of atmospheric noise emissions.

Therefore the combination of the continuous day and night time operation of the site, frequent arrivals and departures of refrigerated lorries, the relatively poor sound insulation of the bakery buildings and the operation of plant items, means that the surrounding residential areas are inevitably affected by noise emissions from the site to a significant extent. This is reflected by the fact that the bakery has a long history of noise complaints.

## 4 DEVELOPMENT PROPOSALS

The proposed scheme entails the demolition and removal of all existing buildings at the site and the construction of a new mixed use development. The current proposed outline scheme shows 3/4 storey commercial buildings with undercroft parking at the north of the site accessed from the Gould Road entrance, and a mix of low rise town houses and flats to the rest of the site with access from Edwin Road.

## 5 PLANNING POLICY CONTEXT & ASSESSMENT GUIDANCE

In considering the potential noise impact of the proposed development, reference will be made to the following policy guidance and 'industry standard' design guidance.

### 5.1 National Policy

Current governmental guidance relating to the determination of planning applications is given in the recently published National Planning Policy Framework (NPPF).

Paragraph 109 of the NPPF advises:

*"The planning system should contribute to and enhance the natural and local environment by:*



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*protecting and enhancing valued landscapes, geological conservation interests and soils;*

*recognising the wider benefits of ecosystem services;*

*minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*

*preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and*

*remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

With specific regard to noise, paragraph 123 of the NPPF states:

*"Planning policies and decisions should aim to:*

*avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;*

*mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions;*

*recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and*

*identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason."*

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With regard to the “adverse impacts” referred to in the first two of the above bullet points, the NPPF directs the reader to the advice contained in DEFRA’s Noise Policy Statement for England (NPSE). This Policy Statement introduces the concept of a “Significant Observed Adverse Effect Level” (SOAEL), “Lowest Observed Adverse Effect Level” (LOAEL) and “No Observed Adverse Effect Level” (NOAEL). However, whilst the intent of the NPSE in relation to the NPPF is clear, the Noise Policy Statement for England does not, at this time, provide any quantitative threshold values for each identified level of “effect”. Indeed, the NPSE carefully highlights that:

*“It is not possible to have a single objective noise-based measure that defines SOAEL that is applicable to all sources of noise in all situations. Consequently, the SOAEL is likely to be different for different noise sources, for different receptors and at different times. It is acknowledged that further research is required to increase our understanding of what may constitute a significant adverse impact on health and quality of life from noise. However, not having specific SOAEL values in the NPSE provides the necessary policy flexibility until further evidence and suitable guidance is available.”*

The Government has now issued “National Planning Practice Guidance” to assist in understanding the perception of noise effects, outcomes and actions that should be taken to align decision making with the NPPF. The table below sets out this guidance:

Perception	Examples of Outcomes	Increasing Effect Level	Action
Not noticeable	No Effect	No Observed Effect	No specific measures required
<b>No Observed Adverse Effect Level (NOAEL)</b>			
Noticeable and not intrusive	Noise can be heard, but does not cause any change in behaviour or attitude. Can slightly affect the acoustic character of the area but not such that there is a perceived change in the quality of life.	No Observed Adverse Effect	No specific measures required

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Lowest Observed Adverse Effect Level (LOAEL)			
Noticeable and intrusive	Noise can be heard and causes small changes in behaviour and/or attitude, e.g. turning up volume of television; speaking more loudly; closing windows for some of the time because of the noise. Potential for non-awakening sleep disturbance. Affects the acoustic character of the area such that there is a perceived change in the quality of life.	Observed Adverse Effect	Mitigate and reduce to a minimum
Significant Observed Adverse Effect Level (SOAEL)			
Noticeable and disruptive	The noise causes a material change in behaviour and/or attitude, e.g. having to keep windows closed most of the time, avoiding certain activities during periods of intrusion. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening and difficulty in getting back to sleep. Quality of life diminished due to change in acoustic character of the area.	Significant Observed Adverse Effect	Avoid
Noticeable and very disruptive	Extensive and regular changes in behaviour and/or an inability to mitigate effect of noise leading to psychological stress or physiological effects, e.g. regular sleep deprivation/awakening; loss of appetite, significant, medically definable harm, e.g. auditory and non-auditory	Unacceptable Adverse Effect	Prevent

In light of the above, it can be seen that whilst the NPPF and associated planning practice guidance sets out stringent imperatives to ensure the satisfactory development of land in relation to possible noise impacts, the NPPF does not generally provide any detailed technical guidance defining what may be considered to constitute a “significant” or “other” adverse impact. In the absence of such technical guidance, reference needs to be made to sustainable development standards set out in local policy and/or relevant ‘industry standard’ guidance, as set out later in this report.

## 5.2 Regional Policy

### 5.2.1 The London Plan 2011

The London Plan includes policies to make London a more attractive, well-designed and green city. With regard to the noise, Policies 5.3 (Sustainable



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Design and Construction) and 7.15 (Reducing Noise and Enhancing Soundscapes) are most relevant.

Policy 5.3 requires that:

*“The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.”*

The policy further requires that:

*“Major development proposals should meet the minimum standards outlined in the Mayor’s supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles:*

*.....*

*d minimising pollution (including noise, air and urban run-off)*

Policy 7.15 sets out the following aims:

### **Strategic**

*A The transport, spatial and design policies of this plan will be implemented in order to reduce noise and support the objectives of the Mayor’s Ambient Noise Strategy.*

### **Planning decisions**

*B Development proposals should seek to reduce noise by:*

*a minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals*



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- b separating new noise sensitive development from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation*
- c promoting new technologies and improved practices to reduce noise at source.*

### **LDF preparation**

- C Boroughs and others with relevant responsibilities should have policies to:*
  - a reduce the adverse impact of noise through the distribution of noise making and noise sensitive uses, and in highway management and transport policies (see Chapter 6)*
  - b protect Quiet Areas, to be formally identified under Environmental Noise (England) Regulations 2006 (as amended) and consider protection of spaces of relative tranquillity or high soundscape quality, particularly through borough open space strategies.*

### **5.2.2 “Sunder City” – The Mayor’s Ambient Noise Strategy (March 2004)**

The Mayor’s ambient noise strategy addresses three key noise issues:

- *Securing good, noise-reducing surfaces on Transport for London’s roads.*
- *Securing a night aircraft ban across London.*
- *Reducing noise through better planning and design of new housing.*

Other priorities highlighted in the strategy are:

- *extending good, noise-reducing surfaces across all roads where they would be effective, along with less disruptive and better reinstated streetworks*

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- *encouraging quieter vehicles*
- *building noise reduction into day-to-day traffic management – to maximise gains from reducing stop-start driving as congestion falls, smoothing traffic flow, allocating street space better, and other transport measures*
- *improving noise environments through ‘Streets for People’, in Home Zones, in town centres, and in exemplary public space projects*
- *developing a Traffic Noise Action Programme for the 580 kilometres of roads which Transport for London manages, including targeted traffic noise reduction projects*
- *trialling fuel cell buses, seeking to trial hybrid-electric buses, and seeking smoother and quieter driving, including through driver training*
- *establishing a London Ambient Noise Fund for exemplary noise reduction projects, and a London Domestic Noise Fund to improve internal and external noise, especially in poorly-converted flats*
- *seeking improved railway track quality and maintenance on national rail and Underground as far as organisation and funding allow*
- *securing support for exemplary noise barrier-integrated photovoltaic power generation along suitable roads and railways, and noise screening from safety and security fencing*
- *promoting development alongside or over suitable roads and railways, protecting wider areas from noise*
- *ensuring that ‘polluter pays’ levies compensate those affected by aircraft noise and other effects, such as through Aviation Environment Funds for each airport*
- *reducing noise through better planning and design, where London’s growth in people and jobs presents challenges, but redevelopment and refurbishment also offer opportunities - high density, mixed-use development can create quiet outdoor spaces away from traffic*
- *examining the scope for a Mayor’s Sound Award, and promoting exemplary City Soundscape projects.*

### 5.3 Local Policy

Local planning policy is set out in the London Borough of Richmond Upon Thames’ Local Development Framework Development Management Plan adopted November 2011. **Policy DM DC 5 Neighbourliness, Sunlighting and Daylighting** states:

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*In considering proposals for development the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance.*

*To protect privacy, for residential development there should normally be a minimum distance of 20 m between main facing windows of habitable rooms.*

*The Council will generally seek to ensure that the design and layout of buildings enables sufficient sunlight and daylight to penetrate into and between buildings, and that adjoining land or properties are protected from overshadowing in accordance with established standards.*

## 5.4 Other Guidance

### i) BS 8233:2014

Recommendations for indoor ambient noise levels within residential accommodation are given in Table 4 of BS 8233:2014 *Guidance on sound insulation and noise reduction for buildings*, which is reproduced below:

**Table 4** Indoor ambient noise levels for dwellings

Activity	Location	07.00 – 23.00	23.00 – 07.00
Resting	Living room	35 dB L <sub>Aeq</sub> , 16 hour	—
Dining	Dining room/area	40 dB L <sub>Aeq</sub> , 16 hour	—
Sleeping (daytime resting)	Bedroom	35 dB L <sub>Aeq</sub> , 16 hour	30 dB L <sub>Aeq</sub> , 8 hour

It is suggested that in order to ensure the satisfactory amenity of future residents, the above values should be adopted as design targets for the control of external noise intrusion into the residential parts of the proposed development, and that adoption of these values would therefore constitute compliance with the National and Local planning policy outlined above.

It should be noted that the Standard does not provide specific guidance with respect to L<sub>max</sub> noise levels in bedrooms at night, however the following guidance is given in Note 4 to the Table:

**NOTE 4** *Regular individual noise events (for example, scheduled aircraft or passing trains) can cause sleep disturbance. A guideline value may be set in terms of SEL or L<sub>Amax,F</sub> depending on the character and number of events per night. Sporadic noise events could require separate values.*



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WHO guidelines (on which the guidance in this particular section of BS 8233 is largely based) suggest that during the night time period, sleep disturbance could be anticipated where  $L_{Amax}$  noise levels within bedrooms regularly exceed 45 dB. We would therefore suggest that a value of 45 dB  $L_{Amax, fast}$  should be adopted for typically occurring individual noise events within residential bedrooms at night, but in the spirit of the guidance expressed in BS 8233, this should be considered a guideline target rather than a rigid, not to be exceeded criterion.

### ii) Guidelines For Community Noise – 1999 (World Health Organisation)

This document provide a comprehensive summary of research regarding the effects of noise on the community. The introduction of the Guidelines state:

*“Community noise (also called environmental noise, residential noise or domestic noise) is defined as noise emitted from all sources, except noise at the industrial workplace. Main sources of community noise include road, rail and air traffic, industries, construction and public work, and the neighbourhood. Typical neighbourhood noise comes from premises and installations related to the catering trade (restaurant, cafeterias, discotheques, etc.); from live or recorded music; from sporting events including motor sports; from playgrounds and car parks; and from domestic animals such as barking dogs. The main indoor sources are ventilation systems, office machines, home appliances and neighbours.*

Section 2 of the Guidelines presents a general discussion regarding the types of noise affecting communities and their measurement. The guidelines promote the use of the  $L_{Aeq,T}$  noise index. However, where there are distinct events to the noise, such as with aircraft or railway noise, the guidelines recommend that measures of the individual events should be obtained (using, for example,  $L_{Amax}$  or  $L_{AE}$ ), in addition to  $L_{Aeq,T}$  measurements.

For dwellings, it is recommended that internal noise levels do not exceed a value of 35dB  $L_{Aeq,T}$  in living rooms during the daytime (07.00 to 23.00 hours). These values equate to external sound levels of 50dB  $L_{Aeq,T}$  incident on the windows of living rooms.

The WHO Guidelines also state that:

*“During the daytime, few people are seriously annoyed by activities with  $L_{Aeq}$  levels below 55dB; or moderately annoyed with  $L_{Aeq}$  levels below 50dB.”*

With regard to night-time noise, Section 4.3.2 of the WHO Guidelines state:

*“At night, sound pressure levels at the outside façades of the living spaces should not exceed 45 dB  $L_{Aeq}$  and 60 dB  $L_{Amax}$  so that people may sleep with bedroom windows open. These values have been obtained by assuming that the noise reduction from outside to inside with the window partly open is 15 dB.”*

## 6 EXISTING NOISE ENVIRONMENT

In order to determine the typical current noise levels in the vicinity of the site, a noise survey was undertaken on 20<sup>th</sup> and 21<sup>st</sup> April 2016. During the survey period it was noted that Heathrow airport was on easterly operations.

### 6.1 Measurement Locations

Noise levels were continuously monitored at three measurement locations, as follows:

- Position 1:** At first floor level on the exterior of the transport office building at the south end of the site, overlooking the loading/unloading bay and the Edwin Road site entrance.
- Position 2:** At the western boundary of the site to the rear gardens of the properties fronting Crane.
- Position 3:** On the first floor flat roof of the office building at the north end of the site, overlooking the railway lines.

The approximate locations of the measurement positions are also shown on **Figure 2** attached at **Appendix B**.

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## 6.2 Survey Procedure

At each measurement location, sample measurements of the  $L_{A90}$ ,  $L_{Aeq}$  and  $L_{Amax,fast}$  sound levels were made over consecutive 15 minute periods. The analysers were also programmed to record corresponding octave band frequency spectra.

Sample manned measurements were also made during site attendances.

Please refer to **Appendix C** for an explanation of the acoustic terminology used above.

## 6.3 Instrumentation

The following instrumentation was used for the survey:

### Position 1

Larson Davis Precision Sound Level Analyser	Type 824
GRAS ½" Condenser Microphone	Type 40AE
Brüel and Kjær Sound Level Calibrator	Type 4230
Proscon Outdoor Microphone Kit	

### Position 2

Brüel and Kjær Precision Sound Level Analyser	Type 2260
Brüel and Kjær ½" Condenser Microphone	Type 4189
Brüel and Kjær Sound Level Calibrator	Type 4230
Brüel and Kjær Outdoor Microphone Kit	Type UA 1404

### Position 3

Svantek Sound and Vibration Data Logger	Type 948
MCE ½" Condenser Microphone	Type 212
Brüel and Kjær Sound Level Calibrator	Type 4230
Brüel and Kjær Outdoor Microphone Kit	Type UA 1404

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The sound level analysers were calibrated prior to the survey and the calibration was checked upon completion. No drift was found to have occurred.

### 6.4 Weather Conditions

Weather conditions during the survey period mild and dry with very light winds

Typical measured sound levels are presented on **Time History Graphs 6564/TH1, TH2 and TH3** attached at **Appendix D**.

### 6.5 Discussion of Results

At Position 1 the measured values are dominated by noise generated by lorries entering and leaving the site and by loading bay activity. Noise levels remained relatively high throughout the survey period (the daytime average was 69 dB  $L_{Aeq}$  and the night time average was 60 dB  $L_{Aeq}$ ), which reflects the fact that the site remains active on a 24 hour basis. Background noise levels were also found to be dominated and controlled by lorry and loading bay noise.

Noise levels measured at Position 2 were lower since this location is screened from the noise generated in the vicinity of the loading bay and site entrance by the southern end of the factory building. Noise levels were influenced by the break-out of noise from inside the factory. The average daytime value was 61 dB  $L_{Aeq}$ , whilst the average night time value was 53 dB  $L_{Aeq}$ . The measured background noise levels (average of 50 dB  $L_{A90}$  during the daytime period and 46 dB  $L_{A90}$  during the night time) are likely to be influenced to some extent by plant and/or factory noise, but are likely to have been also affected by remote environmental sources.

At position 3 noise levels were jointly influenced by plant noise, noise break-out from the factory buildings and noise from trains and aircraft. Manual sample measurements near this location indicated that typical maximum noise levels due to train and plane events are around 79 dB  $L_{Amax}$  and 74 dB  $L_{Amax}$ , respectively, and it is likely therefore that most of the  $L_{Amax}$  values recorded during the survey period are attributable to these sources. The underlying background noise level remained fairly steady, which suggests that this was controlled by noise from an item of plant.



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## 7 IMPACT OF CURRENT NOISE LEVELS

From site observations and the results of the survey it is subjectively very clear that the residential properties in the immediate vicinity are affected to a significant degree by noise emissions from the site itself and, although assessment of this was beyond the scope of this assessment, it is further likely that noise associated with commercial vehicle activity in the nearby roads (particularly where lorries are obliged to park whilst awaiting site access) also affects other properties not directly exposed to noise from the actual site. Greggs have confirmed that complaints from neighbouring properties regarding noise disturbance have been and are common, with noise associated with vehicles on the site and on the nearby roads frequently cited as being the cause.

In order to assess the extent to which neighbouring properties are affected it would be necessary to measure the noise climate prevailing on the site in the absence of noise emissions from or associated with the bakery. However, given the intensity of the current use this is not possible, and therefore an estimate of the likely average ambient noise levels on the site has been derived based on sample measurements taken in nearby locations not affected by noise emissions from the bakery. Sample measurements were taken at locations in May Road (approximately 120m to the west of the site) and in Warwick Road (approximately 70m to the east of the site). Based on the results of these measurements the following values have been estimated:

Time Period	Estimated Average Ambient Noise Level
07.00 - 23.00	55 dB, $L_{Aeq}$ , 46 dB $L_{A90}$
23.00 - 07.00	50 dB $L_{Aeq}$ , 41 dB $L_{A90}$

The significance of noise emissions from industrial sites can be evaluated with reference to British Standard BS 4142:2014 *Methods for rating and assessing industrial and commercial sound*. This essentially entails comparing the rating level of the sound source (the noise level of the source being assessed plus a range of possible character corrections) at the relevant location to the average otherwise prevailing background noise level. The Standard provides the following guidance:

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- a) *Typically, the greater the difference, the greater the magnitude of the impact.*
- b) *A difference of around +10 dB or more is likely to be an indication of a significant adverse impact, depending on the context.*
- c) *A difference of around +5 dB is likely to be an indication of an adverse impact, depending on context.*
- d) *The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or a significant adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on context.*

With regard to the corrections to be applied for the character of the noise source, the Standard states:

*Certain acoustic features can increase the significance of impact over that expected from a basic comparison between the specific sound level and the background sound level. Where such features are present at the assessment location, add a character correction to the specific sound level to obtain the rating level.*

With regard to tonality:

*For sound ranging from not tonal to prominently tonal the Joint Nordic Method gives a correction of between 0 dB +6 dB for tonality. Subjectively, this can be converted to a penalty of 2 dB for a tone which is just perceptible at the noise receptor, 4 dB where it is clearly perceptible, and 6 dB where it is highly perceptible.*

With regard to impulsivity:

*A correction of up to +9 dB for sound that is highly impulsive, considering both the rapidity of the change in sound level and the overall change in sound level. Subjectively, this can be converted to a penalty of 3 dB impulsivity which is just perceptible at the noise receptor, 6 dB where it is clearly perceptible, and 9 dB where it is highly perceptible.*

With regard to intermittency:

*.....If the intermittency is readily distinctive against the residual acoustic environment, a penalty of 3 dB can be applied.*

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Given the varying nature and number of noise generating sources operating at any given time on the site, a full and detailed BS 4142 assessment would be a complicated and time consuming exercise which, given our subjective observations and the historic noise complaints record, is not necessary in the context of the current general evaluation. Therefore, in order to gain an indication of the likely situation with respect to the Standard, the noise levels anticipated at the rear elevations of the central and southern areas of the residential properties fronting Crane Road and Norcutt Road have been considered.

Based on the results of the environmental noise survey of the site and taking the above factors relating to character corrections into account, the following rating noise levels at the rear elevations of the houses are estimated:

Time Period	Rating Noise Level
Day (07.00 - 23.00)	70 dB
Night (23.00 - 07.00)	61 dB

With reference to the previously discussed estimated average ambient site noise levels, the above values correspond to differences of + 24 dB and 20 dB for the daytime and night time periods, respectively. This is a clear indication that an assessment in accordance with BS 4142 is likely to demonstrate a significant adverse impact at nearby residential properties, and therefore reinforces the subjective impression and circumstantial evidence pointing to the fact that noise from the existing use is having a substantial impact on residential amenity.

## 8 PROPOSED DEVELOPMENT

The current proposed scheme envisages low rise residential accommodation over most of the site with a slightly larger residential building and a commercial (office) building at the northern end of the site. It is reasonable to assume that with the exception of the north elevations of the buildings at the northern end of the site (which are likely to experience somewhat elevated noise levels due to train movements), all other proposed buildings are likely to be subject to noise levels of the



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order of the estimated average ambient noise levels discussed in section 7 above, and that during periods of easterly operations at Heathrow airport some aircraft fly-over events may take place during the night time period. With regard to the north elevations of the proposed properties at the northern end of the site, it might be assumed that these areas will be exposed to noise levels as measured at position 3 of the environmental noise survey, although this is probably pessimistic since the measured noise levels were not just due to the railway but in fact were also influenced by noise from the current bakery use.

Therefore on this basis an assessment to determine whether the anticipated noise levels on the site will be compatible with the proposed uses has been undertaken.

### 8.1 Acoustic Design Targets

Recommendations for indoor ambient noise levels within residential accommodation are given in Table 4 of BS 8233:2014 *Guidance on sound insulation and noise reduction for buildings*, which is reproduced below:

**Table 4** Indoor ambient noise levels for dwellings

Activity	Location	07.00 – 23.00	23.00 – 07.00
Resting	Living room	35 dB L <sub>Aeq</sub> , 16 hour	—
Dining	Dining room/area	40 dB L <sub>Aeq</sub> , 16 hour	—
Sleeping (daytime resting)	Bedroom	35 dB L <sub>Aeq</sub> , 16 hour	30 dB L <sub>Aeq</sub> , 8 hour

It is suggested that in order to ensure the satisfactory amenity of future residents, the above values should be adopted as design targets for the control of external noise intrusion into the residential parts of the proposed development, and that adoption of these values would therefore constitute compliance with the National and Local planning policy outlined above.

It should be noted that the Standard does not provide specific guidance with respect to L<sub>max</sub> noise levels in bedrooms at night, however the following guidance is given in Note 4 to the Table:

**NOTE 4** Regular individual noise events (for example, scheduled aircraft or passing trains) can cause sleep disturbance. A guideline value may be set in terms of SEL or L<sub>Amax,F</sub> depending on the character and number of events per night. Sporadic noise events could require separate values.

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WHO guidelines (on which the guidance in this particular section of BS 8233 is largely based) suggest that during the night time period, sleep disturbance could be anticipated where  $L_{Amax}$  noise levels within bedrooms regularly exceed 45 dB. We would therefore suggest that a value of 45 dB  $L_{Amax, fast}$  should be adopted for typically occurring individual noise events within residential bedrooms at night, but in the spirit of the guidance expressed in BS 8233, this should be considered a guideline target rather than a rigid, not to be exceeded criterion.

With regard to offices, BS 8233 gives a design range for the internal noise level within an “executive office” of 35 - 40 dB  $L_{Aeq, T}$ , and for the accommodation of the type proposed it is suggested that the upper end of this range would be appropriate.

### 8.2 Assessment Of Noise Intrusion

Based on the measured and estimated daytime and night-time sound levels, the following sound reduction performance requirements for the external building fabric have been calculated in order to control noise intrusion in accordance with the above design targets:

Room Type	Required Sound Insulation, dB(A)	
	Facades overlooking central locations	Facades overlooking railway
Living rooms - Daytime ( $L_{Aeq, 16hour}$ )	20	27
Bedrooms - Night-time ( $L_{Aeq, 8hour}$ )	20	27
Bedrooms - Night-time ( $L_{Amax, fast}$ )	29	34
Offices - Daytime ( $L_{Aeq, 16hour}$ )	10	22

For most building façades, the control of noise transmission through glazed elements will be the most important factor affecting the overall outside-to-inside sound insulation. Whilst the NPPF has superseded earlier governmental advice contained within PPG24, much of the technical guidance set out in that document still remains relevant. In particular, Annex 6 of PPG 24 provides the following guidance with regard to the typical outside-to-inside noise reduction expected from windows in a dense façade for a variety of noise sources. From the table above it can be seen that



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that the highest requirements are those needed to achieve the night time  $L_{Amax}$  design target. For electric trains (relevant to the facades overlooking the railway) and for civil aircraft (relevant to all other facades), the following guidance is given:

Noise Source	Difference Between dB(A) Levels Outside and Inside		
	Single glazing	Thermal double glazing	Secondary glazing
Electric Train	30 dB(A)	36 dB(A)	41 dB(A)
Civil Aircraft	27 dB(A)	32 dB(A)	35 dB(A)

It can be seen that in all cases the use of “thermal double glazing” would adequately control noise intrusion into residential rooms, and into the office accommodation. In order to comply with other sustainability requirements, it is highly likely that all windows will include thermal double glazed units, and therefore this will also ensure that adequate control of external noise intrusion can be achieved.

Notwithstanding the above conclusion, it will be readily appreciated that the sound insulation of windows will reduce when they are open. Guidance given in Annex 6 of PPG 24 suggests that the sound insulation provided by any window “when partially open” will be in the region of 10-15dB(A). As such, it is clear that whilst thermal double glazing can be selected to provide an adequate level of acoustic protection against traffic noise, it will only maintain reasonable internal noise levels when closed. In view of this, alternative means of ventilation will need to be provided to enable future occupants to have the option of keeping windows shut, whilst maintaining an appropriate level of ventilation. Alternative means of ventilation could include a mechanical ventilation strategy (such as the use of whole house heat recovery system) or the use of an acoustically rated passive ventilation strategy.

## 9 CONCLUSIONS

The site is currently very intensively used both in terms of the level of site activity (the current bakery activities ceasing only for a brief period on Saturday evening through to 6 am on Sunday morning), and the extent to which the site is physically occupied. Site activities (both bakery

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processes and the loading, unloading, and movement of refrigerated lorries) generate significant noise levels, and noise emissions from the site have in the past and into the present resulted in complaints from residential neighbours. Residential properties in other nearby roads are also reportedly affected by noise from vehicles accessing or leaving the site and from vehicles obliged to wait in the roads until space becomes available on site.

An environmental noise survey has been undertaken to determine the noise levels currently generated on the site, and an assessment based on these results and other noise level measurements clearly indicates that noise emissions from the site are currently resulting in a significant adverse impact with respect to the amenity of the neighbouring residential properties.

The proposed development would not be expected to generate any significant noise emissions, and therefore in light of the above it is clear that the proposed change of use would result in a significant improvement to the amenity of residents in the area.

The site noise data have been further reviewed in the context of the guidance given in BS 8233: 2014, and it is concluded that environmental noise intrusion into the buildings on the proposed development will be adequately controlled by the use of the proposed thermal double glazed windows and alternative means of ventilation, and that the site is therefore suitable for the proposed use.



Christopher Hookway



## APPENDIX A

REV	DATE	NOTES
1	20.12.20	Issue for planning

<b>DRAWN BY</b> AW	<b>CHECKED BY</b> CW
-----------------------	-------------------------

<b>JOB NO.</b> 236	<b>STATUS</b> Planning
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<b>DRAWING NO.</b> 216_P_N_001	<b>REV</b> A
-----------------------------------	-----------------



1 Location Plan  
Scale: 1:1250

## APPENDIX B





## APPENDIX C



GLOSSARY OF ACOUSTIC TERMINOLOGY

General

A vibrating surface or turbulent fluid flow will cause pressure fluctuations in the surrounding air. These pressure fluctuations are perceived by the human ear as "sound".

Measurement Units

The human ear can detect sound pressures as low as about 20 µPa, and can tolerate (for short periods) sound pressures as high as 200 Pa, an amplitude range of 10 million times. To take account of this huge amplitude range, sound pressure levels (often written in "acoustic shorthand" as SPL or Lp) are quantified using a logarithmic scale, the decibel (dB) scale. This is based on a reference pressure of 20µPa, thus a sound pressure of 20µPa would equate to 0dB and a pressure of 200Pa would equate to 140dB.

Frequency (Pitch) Characteristics

The sound received at any particular location is not solely influenced by the sound pressure level, the frequency characteristics (pitch) of the noise is also an important factor. Noise audible to a human (with "normal" hearing), typically covers the frequency range 20 Hertz to 20,000 Hertz. Hertz (Hz) are defined as the number of times the sound pressure fluctuates in one second. "Low" pitched sounds fluctuate less times per second than "high" pitched sounds. Whilst humans are capable of detecting a wide range of frequencies, the ear is not equally sensitive to all frequencies – the ear is most sensitive at frequencies towards the middle of the audible range and less sensitive to the lower and higher frequencies.

To take account of this frequency response, sound pressure fluctuations are normally quantified by applying a frequency-weighting network or filter which simulates the frequency response of the ear. In essence, this means that more significance is given to the frequencies at which the ear is most sensitive and less significance to those at which the ear is less sensitive. Noise measurements relating to human reaction are generally made using an "A-weighting" network. These measurements are reported as A-weighted decibels or dB(A). The A-weighted sound pressure level is written in "acoustic shorthand" as L<sub>A</sub>.

Variation of Sound with Time

It will be appreciated that the sound pressure level of most noise sources will fluctuate with time. In order to take account of the way in which the human ear perceives noise, it is normal for the sound pressure level to be quantified using a time weighting network, to mimic the speed of response of the human ear. The standardised setting for most types of noise is a "Fast" time weighting.

The manner in which sound fluctuates with time can also influence the subjective manner in which noise is perceived. Noise can be continuous (showing no significant variation with time as in the case of a fan), intermittent (i.e. the noise is transient in it's nature, such as a train pass-by) or impulsive (i.e. there is a sudden build up of noise - this can range from "clanking" types sounds as might be experienced next to railway goods yard or a high energy discharge such as an explosion)

Measurement of Sound

Sound pressure levels are measured using equipment comprising a pressure-sensitive microphone, associated amplifier, frequency weighting network, time weighted network and output indicator. In its simplest form this is a small hand-held instrument called a sound level meter. More sophisticated instrumentation (a sound level analyser) is also available which allows the real-time output of the frequency characteristics of the sound to be quantified.

Comparison of Sound Levels

To put the significance of noise measurement into context, the following Table presents the A-weighted sound pressure level of some typical sources:

Sound Pressure Level, dB(A)	Typical Noise Source . Activity
160	Saturn Rocket Taking Off
140	Military Jet Taking Off at 30m
100	Nightclub
90	Heavy goods vehicle driving past at 7m
80	Busy urban road
70	Domestic vacuum cleaner at 3m
60	Busy office environment
55	Normal speech at 1m
40	Whispered conversation at 2m
30	Bedroom at night (BS 8233: 1999)
20	Remote country location
0	Threshold of hearing – a very eery silence

Addition of Sound Levels

It is important to note that the use of a logarithmic scale to describe noise does not allow normal arithmetic addition. This means that two noise sources each generating a level of, say, 60dB(A) will not generate a combined sound level of 120dB(A). The values must be added logarithmically, which would actually yield a combined sound level of 63dB(A) in this example.

Subjective Perception of Sound Levels Changes

With regard to the human perception of sound level changes, the human ear:

- Cannot generally perceive a sound level difference of less than 3dB(A)
- Will perceive a sound level difference of 4-5dB(A) as "noticeable"
- Will perceive a sound level difference of 10dB(A) as a doubling (or halving) of loudness.



# GLOSSARY OF ACOUSTIC TERMINOLOGY

## Acoustic Terminology

As stated previously, most sources of noise will fluctuate with time. In order to characterize such noise, it is therefore normal to represent the noise climate using a variety of noise parameters and statistical indices. The most commonly adopted noise parameters are described below:

### $L_{Aeq,T}$

This is the equivalent continuous A-weighted sound level measured over a specified time period “T”. This is the notional continuous sound level which, over the time T, contains the same amount of energy as the actual fluctuating sound being measured. This parameter is widely accepted as being the most appropriate noise descriptor for most environmental noise and the effects of noise on humans.

### $L_{Amax,fast}$

This is maximum A-weighted sound pressure measured with a fast frequency response recorded during the stated measurement period. It is typically used to characterise the highest sound level caused during a noise event.

### $L_{A90,T}$

This is the A-weighted sound pressure level exceeded for 90% of the specified time period “T”. It is normally used to describe the underlying background noise level of an environment since it inherently excludes the effects of transient noise sources.

## Noise Rating (NR) Level

When describing noise from building services installations, it is common to express noise levels in terms of a Noise Rating (NR) Level. The NR level is determined by plotting the measured frequency spectrum of a noise against a series of reference curves, which roughly approximate to equal loudness values. This method permits higher sound levels at low frequencies corresponding to the sensitivity of the human ear. The NR level is defined as the value of the highest curve “touched” by the plotted frequency spectrum. For typical sources of building services noise, the overall A-weighted sound level is numerically around 5-6dB higher than the NR level of the noise.

## Airborne Sound Insulation Measurement Parameters

The ability of a building element to reduce airborne noise can be described by a number of different parameters relevant to both laboratory and on-site performance evaluation. In general, the higher these values, the better the resistance of the construction to the transmission of airborne sound. The most commonly used parameters include:

### $R_w$

The “**Weighted Sound Reduction Index**” ( $R_w$ ) is a single value measure of the intrinsic sound reduction capabilities of a construction, as measured in an acoustic laboratory. Measurement values are determined in accordance with the BS EN ISO 10140 series of standards and weighted in accordance with BS EN ISO 717-1; 1997.

### $R'_{w}$

The “**Weighted Apparent Sound Reduction Index**” ( $R'_{w}$ ) is a single value measure of the apparent sound reduction capabilities of a construction, when installed on-site (which will normally be some way lower than the laboratory value due to less favourable installation conditions, the quality of workmanship, etc.). Measurement values are determined in accordance with the BS EN ISO 140-4; 1998 and weighted in accordance with BS EN ISO 717-1; 1997. In practice, the  $R'_{w}$  of a construction can only be reliably determined if “direct” sound transfer through the partition can confidently be taken as the dominant noise transfer path (i.e. there is no “flanking” sound transmission).

### $D_w$

The “**Weighted Sound Level Difference**” ( $D_w$ ) is a single value measure of the on-site sound reduction between two rooms. This value inherently includes “direct” sound transmission through any separating construction and “flanking” transmission through other building elements.

### $D_{n,Tw}$

The “**Weighted Normalised Flanking Level Difference**” ( $D_{n,Tw}$ ) is a single figure measure of the sound reduction between two rooms solely due to sound transmission through a specified flanking path. This parameter is frequently used to provide an indication of the sound reduction capabilities of suspended ceiling and raised access floor constructions where there is common void between adjacent rooms or as a measure of sound that may be transmitted between rooms through external curtain walling. Measurements are undertaken in accordance with BS EN ISO 10848-2; 2006 and weighted in accordance with BS EN ISO 717-1; 1997

## Impact Sound Insulation Measurement Parameters

Some building elements also have the potential to generate “impact” noise, for example due to human “footfall” on floor structures, or the impact of rainfall on lightweight roofing components. A variety of parameters are again available to define the amount of noise likely to be generated. In general, the lower these values, the less sound the construction will generate as a result of impacts. Typical measurements parameters include:

### $L_{n,T,w}$

The “**Standardised Impact Sound Pressure Level**” is a “single number” rating describing the intrinsic impact sound insulation capabilities of a construction (such as a floor system) as measured in an acoustics laboratory. Values are determined in a vertical sound transmission suite by locating a “tapping machine” in the upper room of the suite and measuring the amount of sound radiated by the floor in the room below. Measurement values are determined in accordance with the BS EN ISO 10140 series of standards and weighted in accordance with BS EN ISO 717-2; 1997.

### $L_{n,T,w}$

The “**Normalised Flanking Impact Sound Pressure Level**” is a “single number” rating describing the amount of flanking sound that would be transmitted to an adjoining space (separated by a partition) due to impacts on the test sample. It is, for example, used to indicate the amount of noise that may be generated due to footfall noise on a raised access floor system. Values are determined in a horizontal sound transmission suite by locating a “tapping machine” one side of a separating partition built off the test sample and measuring the amount of noise radiated by the floor in the adjoining space on the other side of the partition. Measurement values are determined in accordance with BS EN ISO 10848-2; 2006 and weighted in accordance with BS EN ISO 717-2; 1997.

## Room Acoustic Measurements

### T

The “**Reverberation Time**” (T) of a room is defined as the time taken for the sound energy produced by a source (RT) to decay by 60 dB after the source has been switched off. The reverberation time of a space can be calculated by considering the volume of the room and the areas and sound absorption qualities of room surface finishes. Small, “soft” rooms tend to give low reverberation times, whilst large, “hard” rooms tend to give long reverberation times.

### $\alpha_p$

The “**Practical Acoustic Absorption Coefficient**” ( $\alpha_p$ ) is a measure of how much sound energy is absorbed by a building element at a particular frequency, as measured in accordance with BS EN ISO 354; 2003.

### $\alpha_w$

The “**Weighted Absorption Coefficient**” ( $\alpha_w$ ) is a single figure measure of the overall sound absorption capabilities of a building element determined in accordance with BS EN ISO 11654; 1997.



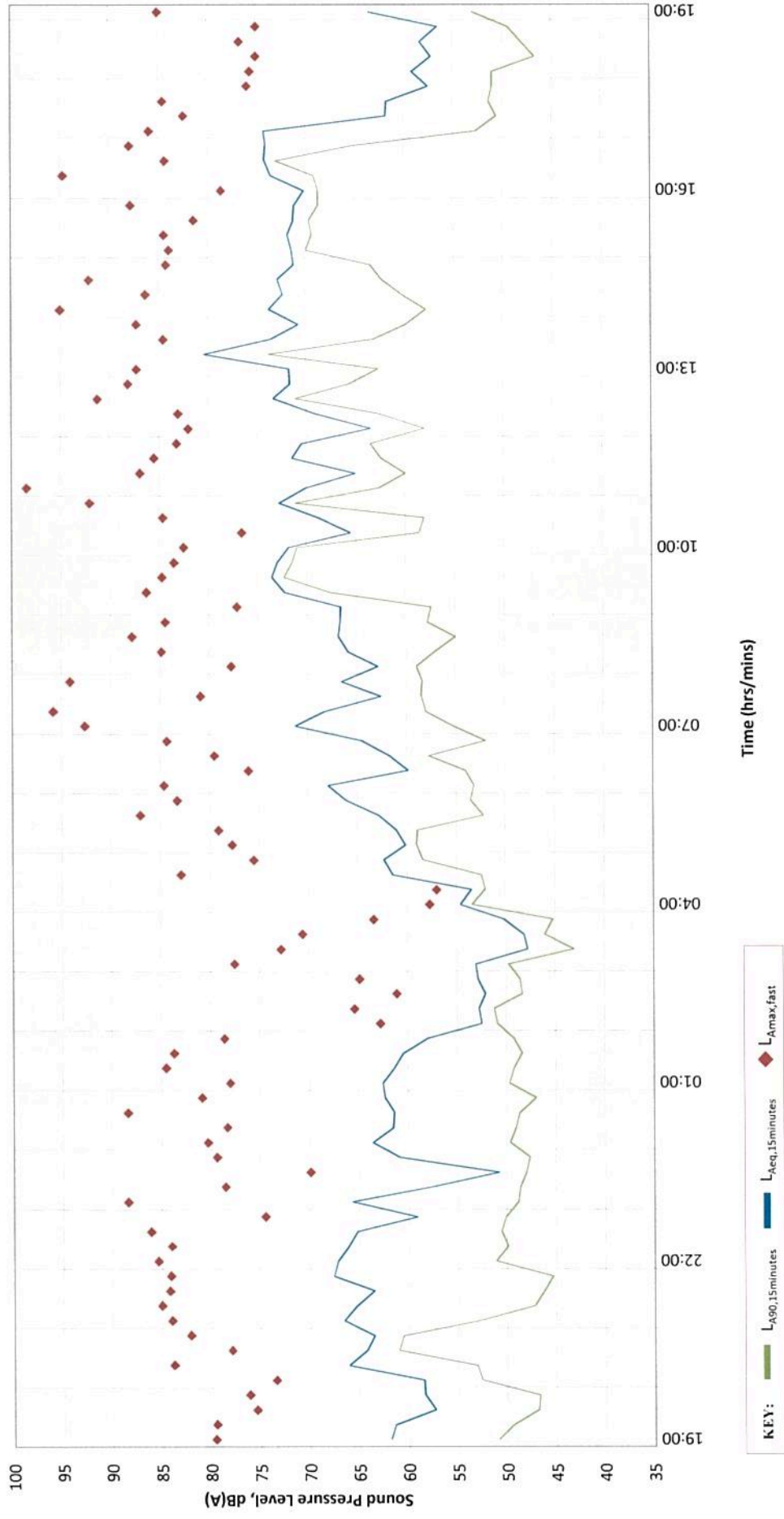
## APPENDIX D

GREGGS BAKERY SITE - GOULD ROAD TWICKENHAM

TIME HISTORY GRAPH 6564/TH1

Results of Automated Noise Measurements at Position 1

Survey Date: 20-21 April 2016

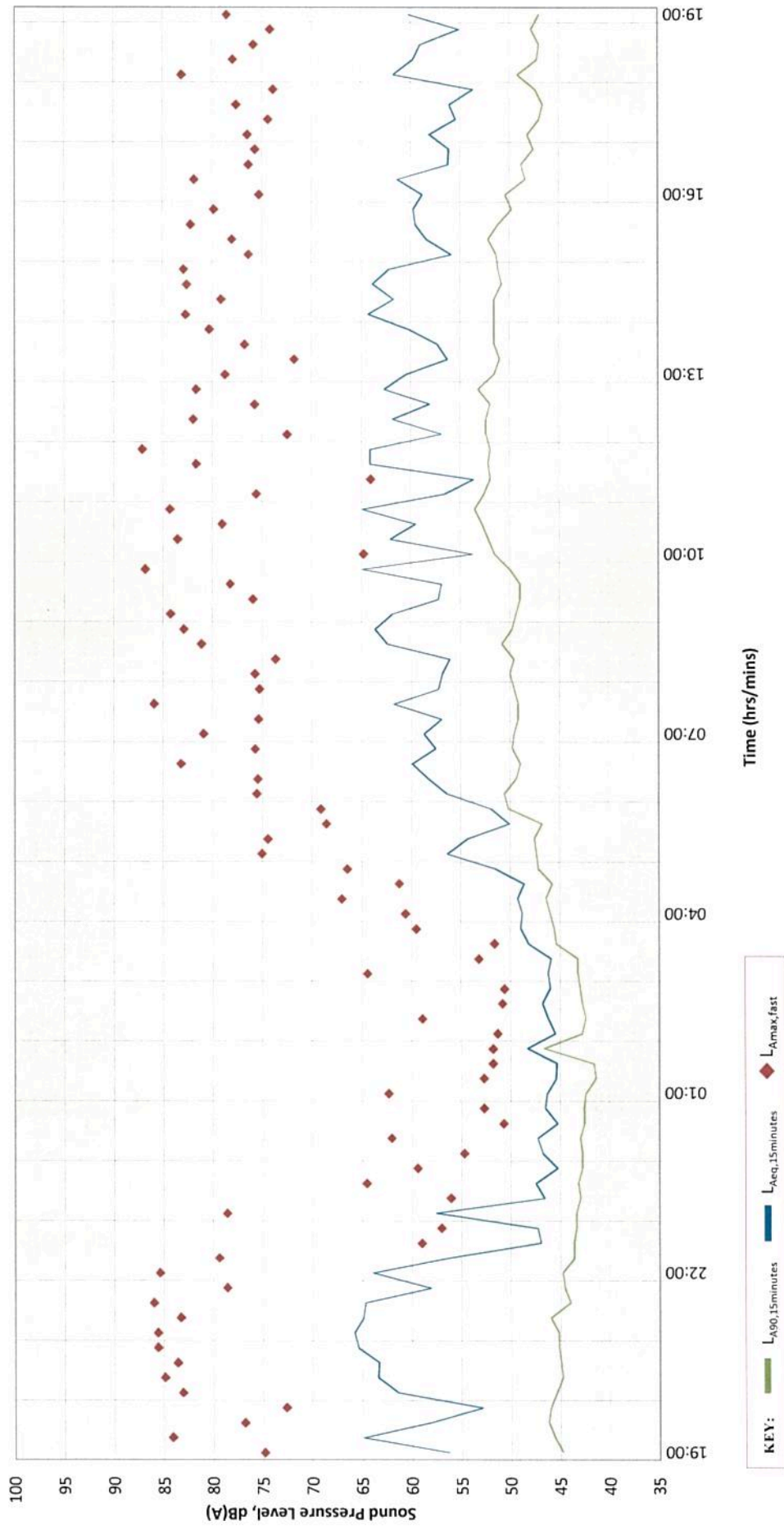


# GREGGS BAKERY SITE - GOULD ROAD TWICKENHAM

## TIME HISTORY GRAPH 6564/TH2

Results of Automated Noise Measurements at Position 2

Survey Date: 20-21 April 2016



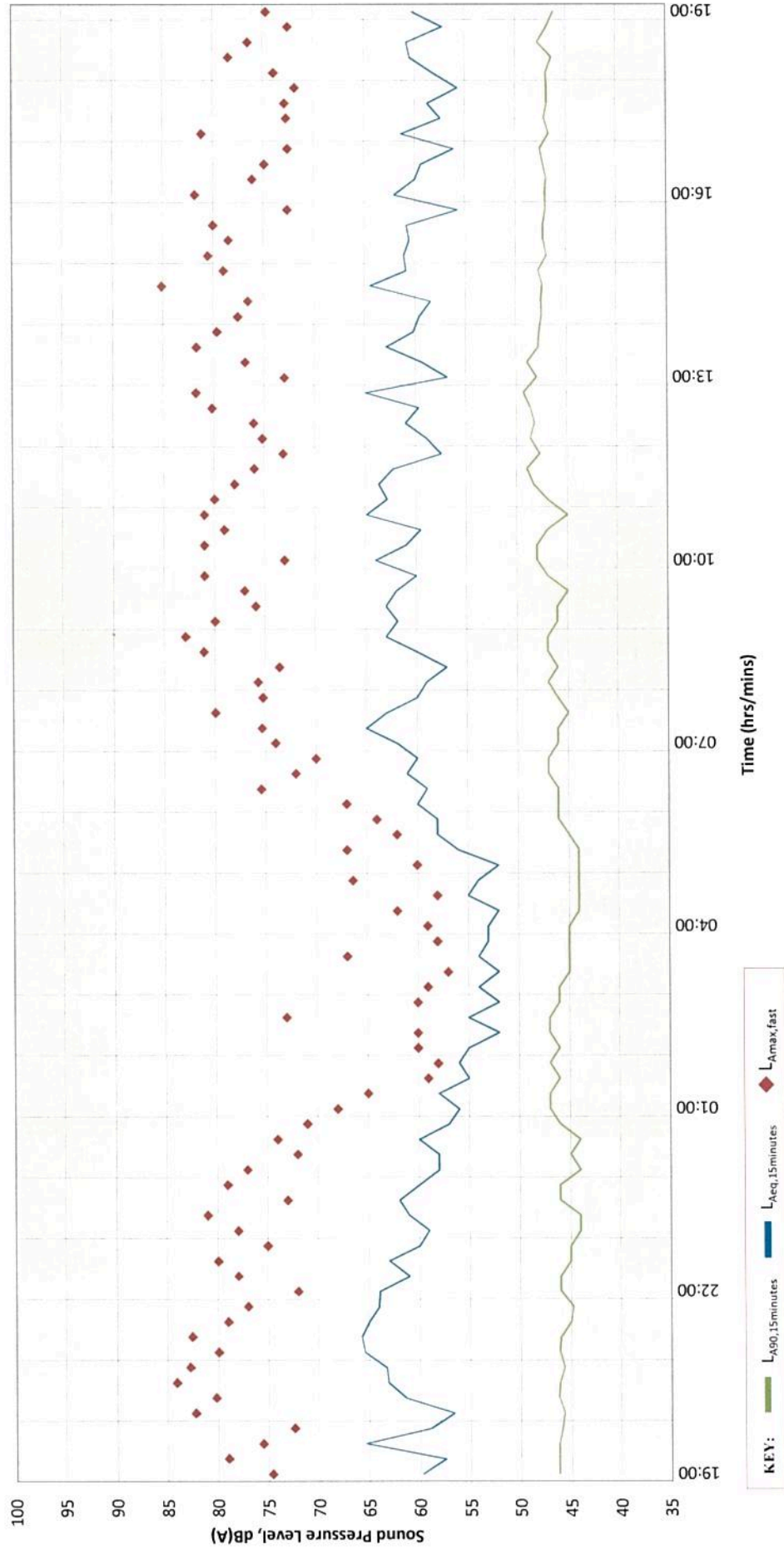
# GREGGS BAKERY SITE - GOULD ROAD TWICKENHAM



## TIME HISTORY GRAPH 6564/TH3

Results of Automated Noise Measurements at Position 3

Survey Date: 20-21 April 2016





## 6 LETTER FROM INDUSTRIAL AND LOGISTIC AGENTS

19<sup>th</sup> August 2016

Ashley Ritchie  
Fernwood House,  
Clayton Road,  
Jesmond,  
Newcastle upon Tyne  
NE2 1TL.

Dear Ashley,

**GREGGS BAKERY, GOULD ROAD, TWICKENHAM TW2 6RT**

I write further to your request to update my letter of 7<sup>th</sup> March 2016 in light of the recent report prepared by NLP. I can therefore confirm that we have reviewed the Employment Assessment Report undertaken by NLP in relation to your redundant and surplus site at Gould Road. Having done so, we consider the market commentary contained within the report to be correct. There is certainly good demand for industrial stock within the Borough of Richmond, by virtue of it being in limited supply. As such, there is a good case to support further industrial development in the wider Twickenham area.

However, I must stress that this does not change the nature of our previous advice. The problem is that the strong local market does not, in itself, improve the saleability of the site to an industrial investor or developer. This is because of the same site-specific constraints which we have raised as a concern with you previously. The rental values we see when reviewing the latest comparable evidence and considering these against the site constraints (shape, neighbouring uses and lack of frontage) make it unattractive to the majority of the market.

The local road network makes it difficult for HGV's to access the site without traffic conflicts occurring. Proximity to nearby residential properties are also likely to attract complaints from members of the public relating to noise, light and smells. Not only would these issues affect a potential occupier, as they have done Greggs historically, but they would also comprise significant barriers for a developer if the site was brought to market as an industrial redevelopment opportunity. In general terms the market demand in LB Richmond suggests this would be achievable, but the individual site characteristics does not provide this opportunity.





In order to ensure that our advice to you is robust, we have also revisited the feasibility work which we undertook in conjunction with your architect, ACG, to explore industrial redevelopment options for the site earlier this year. Our view remains that the Local Planning Authority would be likely to significantly restrict the amount of industrial development that could be achieved as part of a new-build scheme in order to avoid the historic and current conflicts which arise by virtue of its location and changes in parking policy (such as the proposed CPZ). It is also likely that there will be restrictions on hours of use, anything less than a 24-hour operation allowance will deter developers from the outset as this is becoming a minimum requirement and would have an impact on any potential pre-let activity. As before, we consider this would result in a smaller scheme with more restrictions over its use.

You should be aware that we have given this matter serious consideration. We are exceptionally active in the industrial market and have a market-leading position amongst other agents. We have had informal conversations with our developer clients and have used these to prepare various development appraisals analysing the site's redevelopment potential as an industrial location. Unfortunately, unlike other sites which we understand the LB Richmond is seeking to allocate as part of its current review, the amount of industrial floor space that could be accommodated on the site when considering a small industrial scheme means it is far less feasible here than elsewhere.

This is not to say that an industrial scheme at the site could not be profitable through various appraisals which may or may not be accepted by the LB Richmond's planners. However, the amount of developer profit (c.£1.1m) we believe is too small to attract the vast majority of industrial investors active in the market due to the considerable site constraints and hurdles which would be required to overcome and also considering that our appraisals are highly assumptive.

We should also note that in order to calculate this level of profit, we have made a series of assumptions which include a contingency fee (5%) and no cost whatsoever for land remediation. This is a significant risk as the historic industrial use of the property (not least that it currently contains a large amount of asbestos) could mean that the decontamination costs are high. It is our view that any prospective purchaser in the current market conditions would be those that assume they could secure a residential permission in order to mitigate these risks which have the potential to completely erode any profit.

I trust this provides a satisfactory clarification of the site's prospects as an industrial location in the current market and would be pleased to discuss any element with you further as required.

Yours sincerely,



**Steven Mitchell**  
**DIRECTOR | INDUSTRIAL AND LOGISTICS**

## 4 REPRESENTATIONS IN RESPONSE TO SCOPING CONSULTATION



29 April 2016

Planning Policy  
London Borough of Richmond Upon Thames  
Civic Centre  
44 York Street  
Twickenham  
Middlesex  
TW1 3BZ

Dear Sir / Madam,

**LOCAL PLAN CONSULTATION - GREGGS BAKERY, GOULD ROAD, TWICKENHAM, TW2 6RT**

We write on behalf of our client Greggs PLC, to make comments on the Local Plan Consultation, with regard to the scope and rationale for review of adopted planning policies (Core Strategy 2009 and Development Management Plan 2011), together with the emerging site allocations.

Greggs PLC (hereafter 'Greggs') own the freehold to land at Gould Road, Twickenham. We wish to comment specifically in relation to the proposed employment allocation for the 'West Twickenham cluster (including Greggs Bakery and surroundings), Twickenham'. In particular, whilst some employment uses might be achievable, Greggs objects to the Council's proposal to allocate the land for these uses.

Greggs has operated a bakery from the site since the business took control as part of a larger property acquisition in 1994. Throughout this period it has proven problematic from an operational and asset management perspective, resulting in the business beginning a search for alternative premises in the late 1990s. This search was scaled back in 2003, despite the site being considered unfit for purpose, but has been continuous and on-going. The business imperative to date has therefore been to operate the unit, albeit unsatisfactorily, for as long as possible until a replacement can be found.

The operational nature of the business has also changed over time. In addition to the premises being unfit for purpose, the company has made a decision to move from operating smaller decentralised bakeries and will centralise production in larger, more suitable premises, over the next few years. As a result a decision was made early in 2016 to consult on the closure of the Twickenham bakery and the relocation of production to Enfield over the next year.

Greggs are nonetheless committed to securing the best long-term use for the site and are therefore eager to engage with the Borough as to its future.

## **Site Context**

The site is located to the north-east of the centre of Twickenham, in a predominantly residential area. The surrounding streets are characterised by two storey Victorian terraced housing. The site currently comprises industrial buildings which house production facilities for Greggs and which fall within a B2 Use Class. To the north, the site is bounded by the river Crane and the railway line. Access to the site is through two vehicular accesses; one on Edwin Road and the other on Gould Road. It is not currently allocated for any particular uses.

Greggs have owned the site since 1994, when they took ownership of the property as part of a much larger property portfolio purchase. They would not have acquired the site as a standalone proposition and since incorporating it into their business the property has been blighted by the substandard quality of existing accommodation; including, for example, the discovery of asbestos upon occupation. The result has been that the business has been incurring an on-going and unsustainable cost of maintenance. In addition to problems with the building fabric, physical constraints of the site (not least relating to transport and noise), have been continually problematic. The physical and financial constraints of the site were such that Greggs began the search for alternative premises in the late 1990s, including a discussion with Richmond Borough Council in 2001. The purpose of this engagement with the Borough was to seek support for the identification of an alternative five acre site.

Greggs failed to identify a suitable replacement site and the search process was correspondingly scaled back in 2003. Whilst the firm has maintained a watching brief for alternative premises, the site's problems have persisted, with Greggs needing to address significant management issues. As the enclosed Guardian article shows (Appendix One), this includes various well-reported negative impacts on the amenity of nearby residents. Typical conflicts with residents relate to damage done to parked vehicles, highways blockages (from both deliveries and staff parking) and the emission of noise, light and odour. The firm has also received complaints about the littering of surrounding streets, such as cigarette butts and coffee cups, by factory staff. The firm has made an exceptional amount of effort to address these concerns, in partnership with the local community, committing considerable financial resource to the site's management in the process. Yet, in addition to the property's physical shortcomings, conflicts still occur with local residents. Greggs is therefore of the opinion that the long-term industrial operation of the site is unacceptable from both a business and community perspective.

## **Previous Consultation**

The Borough previously identified the land as part of a wider potential allocation when, in late 2013, it sought comments on a draft Site allocations Plan. This document sought to allocate the Greggs site and adjoining land as the 'West Twickenham cluster, Twickenham' as outlined overleaf.

### ***TW 11 West Twickenham cluster, Twickenham***

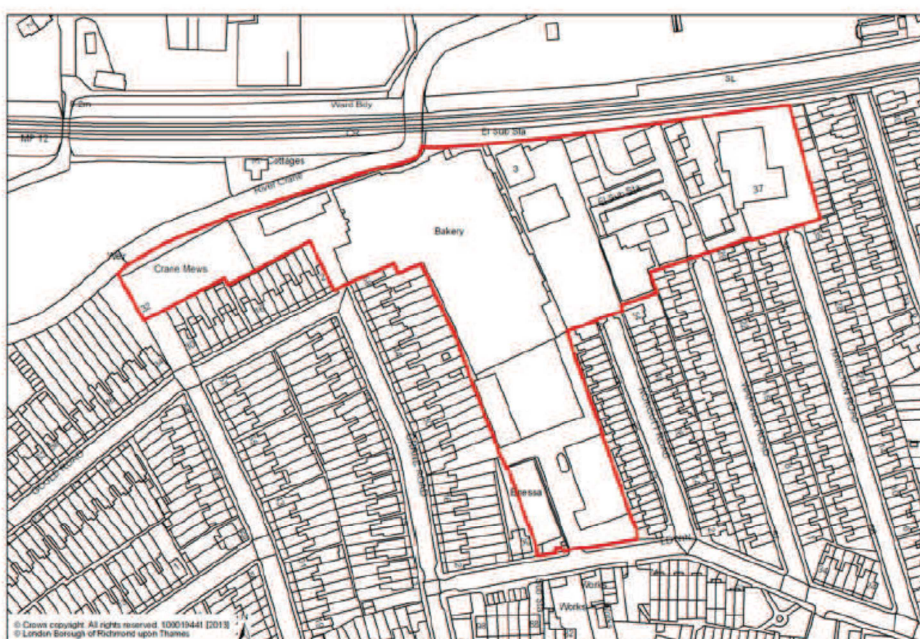
#### ***Proposal***

*Mixed residential, start up and small scale hybrid business space and/or primary school.*

*Proposed Designation as key employment site*

#### ***Justification***

*Mixed uses, retaining levels of employment for start up /creative workshops and small scale business uses. Possibly primary school on part of site. Residential to include appropriate amounts of affordable housing. Access arrangements to be carefully designed to be commensurate with the road network.*



**Proposal Site TW 11 West Twickenham cluster, Twickenham**

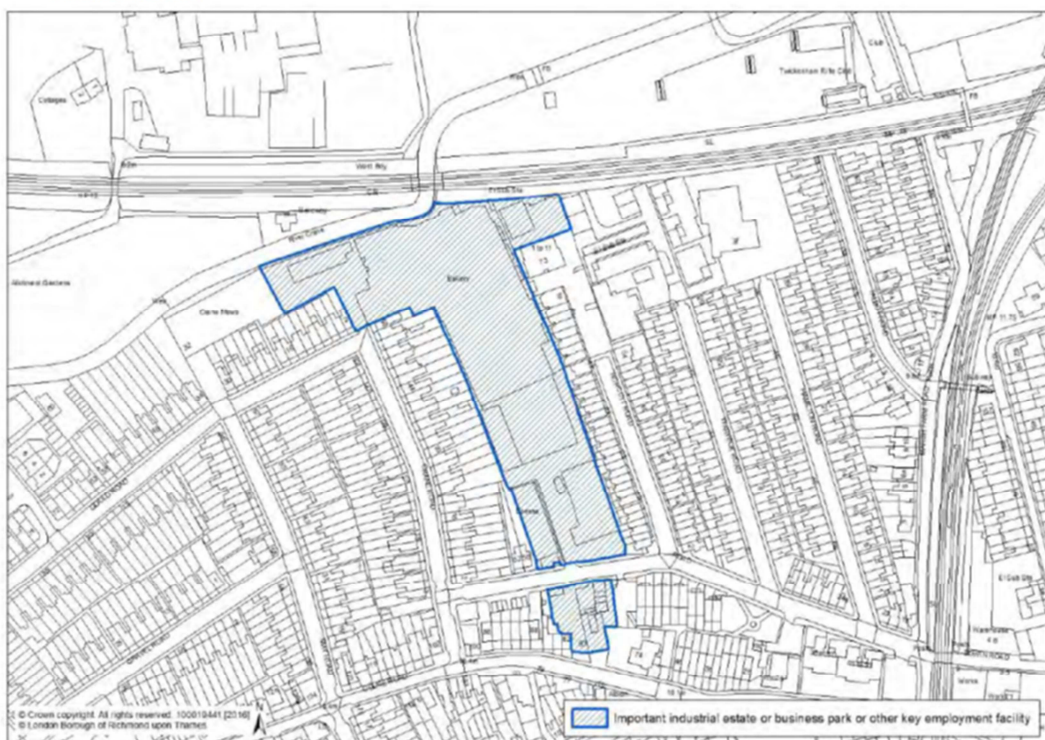
Colliers International submitted representations on behalf of Greggs in November 2013. These supported the allocation of the site and wider area for a residential-led mixed-use development. However, they also highlighted that the reference in the policy text to a 'Proposed Designation as key employment site' was misguided. Greggs were aware at this stage that the site was not suitable for continued employment purposes and this was made clear. This remains the case and influenced the decision to cease manufacturing at the property.



## Current Consultation

The most recent Local Plan consultation document identifies a number of sites that are considered necessary to deliver the Council's spatial strategy. The Greggs site remains included as part of the 'West Twickenham cluster'. However, this allocation is identified as a site suitable for 'important industrial estates, business parks, creative industries and other key employment facilities'. The site boundary has also been amended, including land to the south and excluding land to the east. The accompanying text makes no reference to any mix of uses. This is despite Greggs controlling the majority of the land and making clear previously that there was little long-term opportunity for industrial uses.

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



## Continued Industrial Uses

The site has operated as a bakery for nearly fifty years, before which it was a dairy, and benefits from an unrestricted permission. This allows the use of the site for 24 hour industrial operations without any planning restrictions on access, servicing, noise or emissions. If the site were to be disposed of on the open market, to an industrial occupier, they could therefore manufacture and transport goods without these processes being subject to planning controls. This could have a significant negative impact upon the amenity of nearby residents.

Moreover, paragraph 4.9.1 of the Local Plan consultation document states that the policies focusing on the protection of the employment land are considered to be in general conformity with the NPPF and London Plan. Greggs do not agree with this statement. The NPPF makes clear that “planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for this purpose” (paragraph 22).

Greggs do not consider the site suitable for employment use. Whilst lawful, the firm does not agree with the notion that the property offers the flexibility required for modern industrial operations to take place. This is particularly given the close proximity to residential uses and the resulting negative impact on the transport network and residential amenity; something which the Greggs management team have worked hard to mitigate during occupation and operation of the property, but which has still resulted in conflict.

Greggs have instructed JMP Consultants to prepare a Transport Statement to illustrate such issues (Appendix Two). This has assessed the impact of the current use of the site on the transport network. The report, which is included alongside this letter, details that the surrounding roads are not of a sufficient size to accommodate the HGV's associated with industrial use. The report also highlights the on-going conflict between the use of the site and the amenity of the surrounding residents.

The redevelopment of the site for use as a bakery or any other industrial use is therefore not viable or appropriate. Furthermore the protection of the site for this purpose is not in accordance with the objectives of the NPPF. We also anticipate that local residents would be supportive of these uses ceasing.

### **Potential Mixed-Use Redevelopment**

Whilst the site is not appropriate for continued industrial use, Greggs is of the opinion that it could contribute to continued employment generation through a mixed-use residential development. This has the potential to either maintain or increase the number of employees at the site and contribute to meeting housing need in a manner which supports and enhances the character and appearance of the area.

Greggs has been working on draft proposals to identify and understand the site's potential. These have identified that the site is capable of accommodating a significant amount (2,757sq m) of flexible start-up and small scale hybrid business space. At a typical office density, this would allow for approximately 275 employees to be accommodated as part of a redevelopment scheme, more than currently employed at the site.

Greggs indicative proposals have also sought to respond to the surrounding residential properties in a manner that is complementary and of a similar density. In recreating a traditional London street, terminating in modern flats adjacent to the commercial space, this creates capacity for some 96 residential units. This includes a mix of terraced houses and apartment blocks, family homes and smaller units.



Whilst the site is not currently allocated for any particular uses, Greggs is of the opinion that the Council's previous approach to the site, which sought a residential-led mixed-use allocation, was the correct one. It has been able to demonstrate, through its capacity assessments, that this approach would benefit both the employment generating potential of the site and also contribute to meeting housing need. This could be done in a manner which reduces conflicts between the site and surrounding area, improving and enhancing the amenity of local residents.

## **Summary**

The most recent Local Plan consultation document advises that the proposed land uses have previously been explored through consultation on the draft Site Allocations. However, the proposed allocation of the site for employment use is in conflict with the draft Site Allocations, which supported the mixed-use redevelopment of the site. Greggs has previously made clear that the site is no longer appropriate for industrial uses and the evidence submitted alongside these representations support this. The allocation of the site for a mixed-use scheme, as previously set out in the draft Site Allocations Plan, is therefore considered the most appropriate use of the site. Consequently, Greggs does not support the current approach and objects to the proposed allocation.

As set out above, Greggs has struggled to operate the site to in a satisfactory manner since the site was acquired in 1994. Disposal of the site and relocation to improved premises has been a business consideration for almost two decades. Aside from the current premises being unsatisfactory from a commercial perspective, despite a proactive and committed effort by the Greggs management team, their operation has also negatively impacted upon the amenity of local residents. The site does not meet the requirements of good quality modern manufacturers and Greggs has taken the decision to consult with its employees on the proposed closure of the site. The transport analysis prepared by JMP highlights some of the highways issues associated with the continued use of the site for industrial purposes and the detrimental impact that this could/does have on the road network and residential amenity. An acoustic assessment is also being undertaken which can be provided once complete.

In light of Greggs understanding of the site's history, physical and operational constraints, it considers it necessary to object to the proposed allocation for employment-led use of the site. We trust that our comments will be given full consideration and that our details will be included on the Council's database to ensure we are notified of all future stages of consultation.

We would similarly be grateful for confirmation of receipt of the letter.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Jonathan Morris', is enclosed within a thin black rectangular border.

**For and on behalf of Colliers International**

Our Ref: Greggs, Twickenham.

50 George Street  
London W1U 7GA

[www.colliers.com/uk](http://www.colliers.com/uk)

DDI 020 7344 6632

MOBILE 07717715357

EMAIL [jonathan.manns@colliers.com](mailto:jonathan.manns@colliers.com)

## **Appendix One: Bunfight breaks out over Greggs' Twickenham depot, Guardian, 2012**

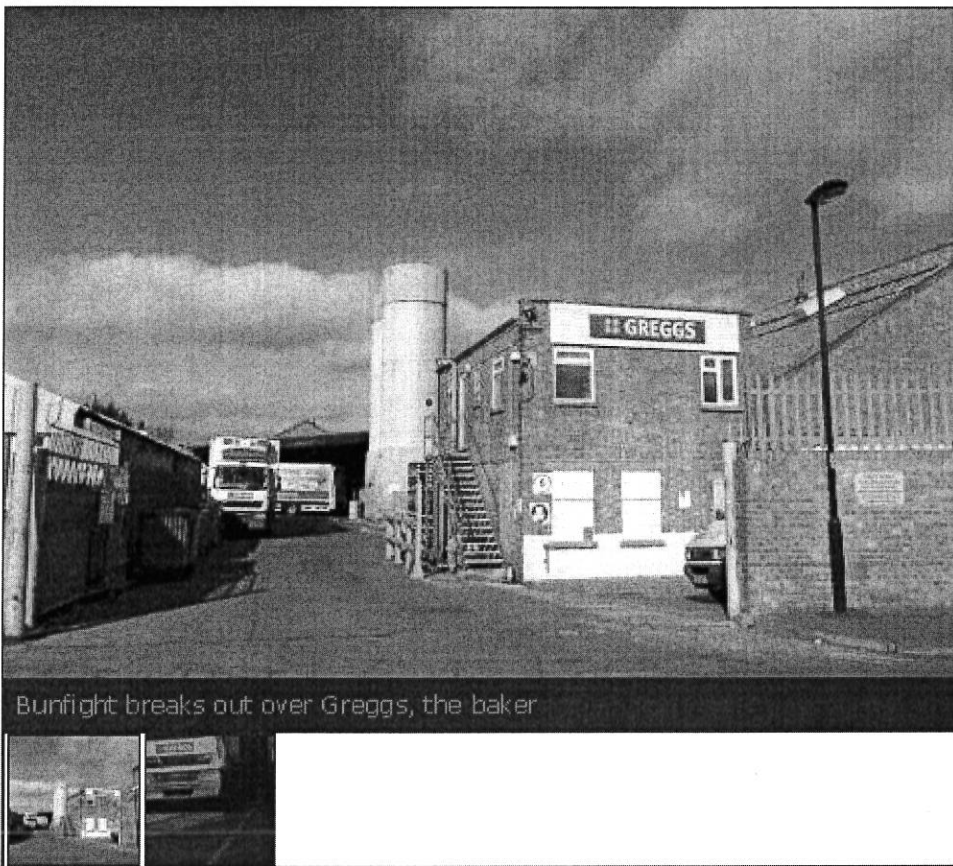
# Your Local **Guardian**.co.uk

## **RICHMOND**

### **Bunfight breaks out over Greggs' Twickenham depot**

Exclusive By Rachel Bishop

5:40pm Friday 24th February 2012 in  
Richmond



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

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

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

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

Don't be afraid to talk  
about mental health.

**it's time to talk. it's  
time to change**  
let's end mental health discrimination

Find out how >

Alan Martin, of Edwin Road, has lived on the street for 24 years with his wife, Sue Powell, who has lived there for 35 years.

This morning he was so incensed by problems the lorries were causing, including noise and congestion which he said made a young mother dodge through each vehicle, that he

stood in front of one and refused to move.

The 62-year-old sculptor said: "I saw out the window one of the mums with a pushchair avoiding the trucks. I went out to her and she said she was used to it.

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

However, despite his actions this morning, he did not agree with the attack on the lorry last night.

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

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

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

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

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

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

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

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

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

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

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

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

Mr Martin said: "I think that they have outgrown their premises, because they have trucks queuing in the road – whereas they should be in the depot.

"They need to go. We all want them to go."

Police were unable to comment.

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### Comments(3)

Teddington Resident says...

8:01pm Fri 24 Feb 12

This company ought to be curbed, they are popping up everywhere selling poor quality products at inflated prices. I believe they originated in the north, it would be good if they went back there and stayed there."

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twickersargyle says...

11:13pm Fri 24 Feb 12

It's about time a stand was made against the Gregg's factory. We used to live in Crane Road and the noise from their extractor fans was horrendous—and it was 24 hours a day, seven days a week. It is a ludicrous place to have such a huge industrial plant and they

should relocate asap—though they told us they were moving for for five years, and they never did.”

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Gareth Roberts says...  
12:02am Sun 26 Feb 12

There you go, Twickersargyle, we have more in common than you thought; I also used to live in Crane Road. About 12 years ago.

As it happens my car came off the worse after a Greggs Van reversed into it, crunching up the door and shoving the whole back of the car up onto the pavement. It then drove into the yard as if nothing had happened. Fortunately a neighbour spotted what happened and let me know.

What was particularly galling was the attitude of the drivers and the site foreman. "Got any proof? Not our problem if there's no proof" was very much the order of the day - it was when I did my CSI Twickenham routine and took them to the lorry in question and pointed out the red paint flecks and scuff marks all over the back there was a collapse of stout party.”

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## **Appendix Two: Transport Statement, JMP Consultants**





## **Greggs Bakery, Gould Road, Twickenham**

### **TRANSPORT STATEMENT**

Report

# Greggs Bakery, Gould Road, Twickenham

## TRANSPORT STATEMENT

Report

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# 1 Introduction

## CONTEXT

- 1.1 JMP Consultants Ltd have been commissioned by Colliers International to provide transport consultancy services for a site located off Gould Road and Edwin Road in the London Borough of Richmond upon Thames (LBRuT), with potential for a residential-led mixed-use planning application. The site currently comprises production facilities for Greggs Bakery but is surplus to requirements and therefore is due to be closed.
- 1.2 The area is typified by primarily residential uses currently and there are limited industrial uses in the locality. However, a number of office-to-residential schemes in the area have been granted planning permission highlighting the increasing transition to residential. The nature of the local area's narrow Victorian terraced streets, in terms of transport and movement, is unsuitable for a modern large scale industrial location and an allocation of the site for industrial or solely office use is not appropriate now or in the future.
- 1.3 A detailed description of the proposed redevelopment is included in Chapter 5 of this report. In brief, the new scheme proposals comprise the provision of approximately 96 residential units and 2,757m<sup>2</sup> of start-up commercial space. The development masterplan is provided in Appendix A.
- 1.4 This Transport Statement (TS) reviews the site's suitability for residential and commercial use in transport terms, and the reasons why industrial development of this nature is not suitable in this location and as a result why the land use designation should be reviewed. It also identifies existing and potential traffic and transport impacts related to the site and its proposed future operation.

## REPORT STRUCTURE

- 1.5 This TS details the transport issues of the existing Greggs site and the potential impacts of the redevelopment proposal. It is divided into the following remaining sections:
  - **Section 2: Policy review** – Provides a summary of the current national and local planning and transport policy that is relevant to the existing and proposed redevelopment;
  - **Section 3: Existing conditions** – Describes the existing transport and highways conditions prevalent at the site and in the surrounding area;
  - **Section 4: Existing site** – Provides an overview of the site's existing use;
  - **Section 5: Redevelopment proposals** – Summarises the redevelopment proposals including proposed access and car and cycle parking arrangements;
  - **Section 6: Multi-modal trip generation** – A multi-modal assessment of trips associated with the existing site and the proposed redevelopment;
  - **Section 7: Suitability of the site for continued industrial use** – Evaluation of the suitability of the site for future industrial or mixed-use; and
  - **Section 8: Summary and conclusion** – Provides a summary of the proposed redevelopment arrangements and its impact on the local area.



## 2 Policy Review

### INTRODUCTION

- 2.1 This chapter reviews current and emerging land use and transport planning policies at national and local government levels, and summarises how the proposed redevelopment should comply and how the existing site is not in compliance with current policy.

### NATIONAL POLICY

#### National Planning Policy Framework (NPPF) (2012)

- 2.2 The NPPF was published on 27 March 2012 and it came into effect immediately, superseding all other national planning policy (except on waste).
- 2.3 The document sets out the government's economic, environmental and social planning policies for England and its expectation for their application. It is meant as high level guidance for local councils to use when defining their local and neighbourhood plans. This approach allows the planning system to be tailored to reflect the needs and priorities of individual communities.
- 2.4 The essence of the document is to support sustainable development, defined as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs' (p.2).
- 2.5 The NPPF defines the delivery of sustainable development through three roles:
- Planning for prosperity (an economic role);
  - Planning for people (a social role); and
  - Planning for places (an environmental role).
- 2.6 It notes that to achieve sustainable development, these roles should be sought jointly and simultaneously through the planning system.
- At the heart of the NPPF is a presumption in favour of sustainable development which 'should be seen as a golden thread running through both plan making and decision taking' (Paragraph 14). In paragraph 15, it goes on to say that 'Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay'.
- 2.7 A sustainable transport mode is described as 'any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport' (Annex 2, p.57).
- 2.8 Paragraph 32 states that developments that generate significant amounts of movement should be supported by a Transport Statement and Transport Assessment. It goes on to state that plans and decisions should take account of whether:
- The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
  - Safe and sustainable access to the site can be achieved for all people; and
  - Improvements can be undertaken within the transport networks that cost-effectively limit the significant impacts of the development. Developments should only be prevented or refused on transport ground where the residual cumulative impacts of development are severe'.

- 2.9 Paragraph 34 seeks to ensure that 'developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised'.
- 2.10 Paragraph 35 goes on to state that 'plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of good or people'. Therefore, developments should be located and designed where practical to:
- 'Accommodate the efficient delivery of goods and supplies;
  - Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
  - Create safe and secure layouts that minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
  - Incorporate facilities for charging plug-in and other ultra-low emission vehicles; and
  - Consider the needs of people with disabilities by all modes of transport'.

## LOCAL POLICY

### Further Alterations to the London Plan (FALP) (2015)

- 2.11 The FALP sets out the Mayor's vision for the development of London up to 2031. It is an overall strategic plan, setting out an integrated economic, environmental, transport and social framework for the development of London.
- 2.12 The Mayor's overarching vision for London is that:
- The city should 'excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change' (para 1.52)
- 2.13 Enabling sustainable modes of transport is considered to support this vision. The Plan notes that London should be:
- 'A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system which actively encourages more walking and cycling and makes better use of the Thames, and supports delivery of all the objectives of this Plan' (Objective 6)
- 2.14 Strategically the Mayor intends to work with all relevant parties to (Policy 6.1):
- Encourage patterns of development that reduce the need to travel, especially by car;
  - Improve the capacity and accessibility of sustainable travel modes such as public transport, walking and cycling;
  - Support development with high levels of trips only in areas of high public transport accessibility;
  - Improve interchange between different forms of travel;
  - Minimise the impact of freight on the transport network;
  - Encourage shifts to more sustainable forms of transport; and
  - Promote walking by ensuring an improved urban realm.
- 2.15 The Gregg's Bakery site is not designated as a Strategic Industrial Location (SIL) in the FALP and therefore is not protected as a main reservoir of London's industrial and related capacity. SILs are typically located close to the strategic road network and are also well located with respect to rail and waterways which can address broader transport objectives. Policy 4.4, on the management of industrial

land and premises, states that the release of surplus industrial land should be planned, monitored and managed so that it can contribute to strategic and local planning objectives, especially those to provide more housing. The plan also states that the release of surplus industrial land should, as far as possible, be focused around public transport nodes to enable higher density redevelopment, especially for housing.

- 2.16 Policy 6.1 states that the plan encourages patterns of development that reduce the need to travel, especially by car, and supports development that generates high levels of trips in locations with high public transport accessibility. The plan also requires that developments do not adversely affect safety on the transport network (Policy 6.3).

### Parking Standards

- 2.17 Table 2.1 summarises the car parking provision standards provided in The London Plan for the relevant elements of the proposed redevelopment. It should be noted that the redevelopment is in an area with a PTAL of 2.

**Table 2.1: Car Parking Standards (The London Plan, 2015)**

Land Use	Standard	Parking Spaces
<b>Residential (suburban) – per unit in areas with PTAL 2 to 4 (maximum spaces)</b>	1-2 bedrooms per unit	Up to 1.5 space per unit
	3 bedrooms per unit	Up to 1.5 space per unit
	4+ bedrooms per unit	Up to 1.5 space per unit
<b>Employment uses – B1</b>	Per 100-600m <sup>2</sup> GIA	1 space

- 2.18 It should be noted that 20% of car parking spaces for new developments in London are required to provide electrical charging points to encourage the uptake of electric vehicles, with residential developments required to provide an additional 20% passive provision for future use and employment uses to provide an additional 10%. For the employment uses, one disabled space should be provided for each employee who is a disabled motorist, with 5% of the total capacity provided as disabled spaces.
- 2.19 The cycle parking standards provided in The London Plan are minimum standards and are summarised below in Table 2.2 for the relevant elements of the proposed redevelopment.

**Table 2.2: Cycle Parking Standards (The London Plan, 2015)**

Land Use	Long Stay	Short Stay
<b>C3/C4 Dwellings (All)</b>	1 space per studio/1 bedroom unit 2 spaces per all other dwellings	1 space per 40 units
<b>B1 Business offices</b>	1 space per 150m <sup>2</sup>	First 5,000m <sup>2</sup> : 1 space per 500m <sup>2</sup> Thereafter: 1 space per 5,000m <sup>2</sup>

### Mayor of London's Transport Strategy (MTS) (2010)

- 2.20 The Mayor's Transport Strategy, published in 2010, contains five main objectives (Chapter 1, para 2):

- Support economic development and population growth;
- Enhance the quality of life for all Londoners;
- Improve the safety and security of all Londoners;
- Improve transport opportunities for all Londoners; and
- Reduce transport's contribution to climate change and improve its resilience.

- 2.21 The Mayor's transport vision for London (Chapter 2, para 29) is that 'London's transport system should excel among those of global cities, providing access to opportunities for all its people and enterprises, achieving the highest environmental standards and leading the world in its approach to tackling the urban transport challenges of the 21st century'.
- 2.22 The Mayor's Transport Strategy gives an indication of the London travel mode share that could be achieved by 2031 with implementation of the Strategy, showing a 3% increase in cycle mode share (to 5% overall) and a 6% decrease in travel by private motorised means (to 37% overall) (p 36).
- 2.23 It is noted that the Mayor will encourage the use of sustainable travel through 'setting appropriate parking standards, encouraging smarter travel planning and making public transport more attractive' (Chapter 4, para 147).
- 2.24 The Mayor notes that TfL will continue to work with boroughs to deliver smarter travel initiatives 'to encourage people to choose between the full range of travel options and increase the share of journeys made by walking, cycling and public transport' (Chapter 4, para 158). The Strategy supports greater cycle participation by making cycling a transport priority. It is noted that 'there will be unprecedented levels of investment in cycling over the next 10 years to improve cycle infrastructure and information' (Chapter 5, para 444).
- 2.25 The Mayor also intends to improve facilities for pedestrians by developing key walking routes between local destinations, enhancing pedestrian space, improving crossing facilities and supporting developments that emphasise greater pedestrian permeability (Proposal 60L).

### **London Borough of Richmond upon Thames Core Strategy (April 2009)**

- 2.26 LBRuT's Core Strategy was adopted in April 2009 and sets out the long-term spatial vision and objectives for the borough. The plan has three key areas that it focuses on:
- A sustainable future;
  - Local character; and
  - Meeting people's needs.
- 2.27 Concerning the future sustainability of the area, the plan states that there is a need to provide for the safe and sustainable movement of people in an area where the road network is often close to capacity. It also states that with regards to meeting people's needs, that there is an acute shortage of housing in the area and there is a need to provide an increased level of all types of housing, including affordable and accessible housing, to meet the demand.
- 2.28 Policy CP1 in the plan concerns sustainable development and seeks to ensure that all new development and refurbishment is as sustainable as possible and located in appropriate and accessible locations to reduce the need to travel by unsustainable modes. The strategy has a target of 95% of all new or converted housing to be built on previously developed land.
- 2.29 LBRuT considers that locating development in sustainable areas and reducing the need to travel by promoting walking, cycling and the use of public transport is the most sustainable way to plan for the Borough's future travel needs. The plan also states that the reducing and management of car travel will contribute to an improvement in air quality, a reduction in traffic noise nuisance and an improvement in the population's health.
- 2.30 Spatial policy CP9 relates to Twickenham Town Centre, to the southeast of the site. The policy states that the LBR intends to revitalise the area to achieve a high quality district centre and will encourage higher density development including affordable and small units and car free development in the town centre. The policy also states that they council is aiming to manage flows and reduce the dominance of vehicles in the town centre environment.

## London Borough of Richmond upon Thames Parking Standards (2011)

- 2.31 LBRuT's parking standards are included in Appendix Four of the Development Management Plan (DMP), which was adopted in November 2011. The car parking standards shown in Table 2.3 are the maximum standards and are relevant for sites outside of controlled parking zones (CPZs), such as the Greggs site in Twickenham.

**Table 2.3: Car Parking Standards (LBRuT, 2011)**

Land Use	Standard	Parking Spaces
Residential (outside of CPZs)	1-2 bedrooms per unit	1 space
	3 bedrooms per unit	2 spaces
	4+ bedrooms per unit	2 spaces
Employment uses – B1 (outside of CPZs)	Per 100m <sup>2</sup>	1 space
	Per 2,500m <sup>2</sup>	1 lorry space per unit

- 2.32 Table 2.4 summarises the minimum cycle parking standards in Richmond for the relevant elements of the scheme.

**Table 2.4: Cycle Parking Standards (LBRuT, 2011)**

Land Use	Standard
C3/C4 Dwellings (All)	1 space per 1-3 bedroom unit
	2 spaces per 4+ bedroom units
B1 Business offices	1 space per 200m <sup>2</sup>

## Twickenham Area Action Plan (July 2013)

- 2.33 The Twickenham Area Action Plan was adopted in July 2013 and forms part of the wider LBRuT Local Plan. The area covered by the plan comprises the central area of Twickenham, including part of the A305 Heath Road to the southeast of the Greggs Bakery site. While the site is not included in the plan area, the route to the A316 Chertsey Road and wider strategic road network requires access through central Twickenham and the plan area.
- 2.34 The plan states that the dominance of vehicular traffic, which adversely impacts on the pedestrian environment, is a key issue in Twickenham. One of the five key themes of the plan is to improve the public realm and reduce the impact of vehicular traffic on the area, making it a safer and more attractive place to visit.

## SUMMARY

- 2.35 This chapter has provided a summary of the relevant national and local policies and has shown that the key policies with which the proposed redevelopment should comply are:
- The proposed redevelopment should be located in an area accessible by public transport, walking and cycling, and the use of these forms of transport by residents and visitors to the site should be encouraged;
  - The proposals do not cause residual cumulative impacts that are severe in terms of road safety or operation, or cause unacceptable environmental intrusion;
  - Car and cycle parking should be provided in line with the London Plan; and

- The scheme should be designed to provide improved circulation and accessibility for pedestrians and cyclists.

2.36 It has also highlighted how the existing site currently does not comply with the policy requirements and would not comply if a new industrial development was proposed, including that:

- Safe and sustainable access cannot be provided for frequent movements of large vehicles due to a constrained local highway network;
- The cumulative impacts of a new industrial development would likely be classed as severe due to a potentially significant increase in the number of HGV trips to and from the site;
- The site is not situated in a location which is practical for the efficient delivery of goods and supplies by large vehicle;
- The layout of the highway around the site access in combination with the frequency of HGV movements does not minimise conflicts between traffic and vulnerable road users; and
- The site is not a Strategic Industrial Location (SIL) and is not located in an area suitable for a SIL.

## 3 Existing Conditions

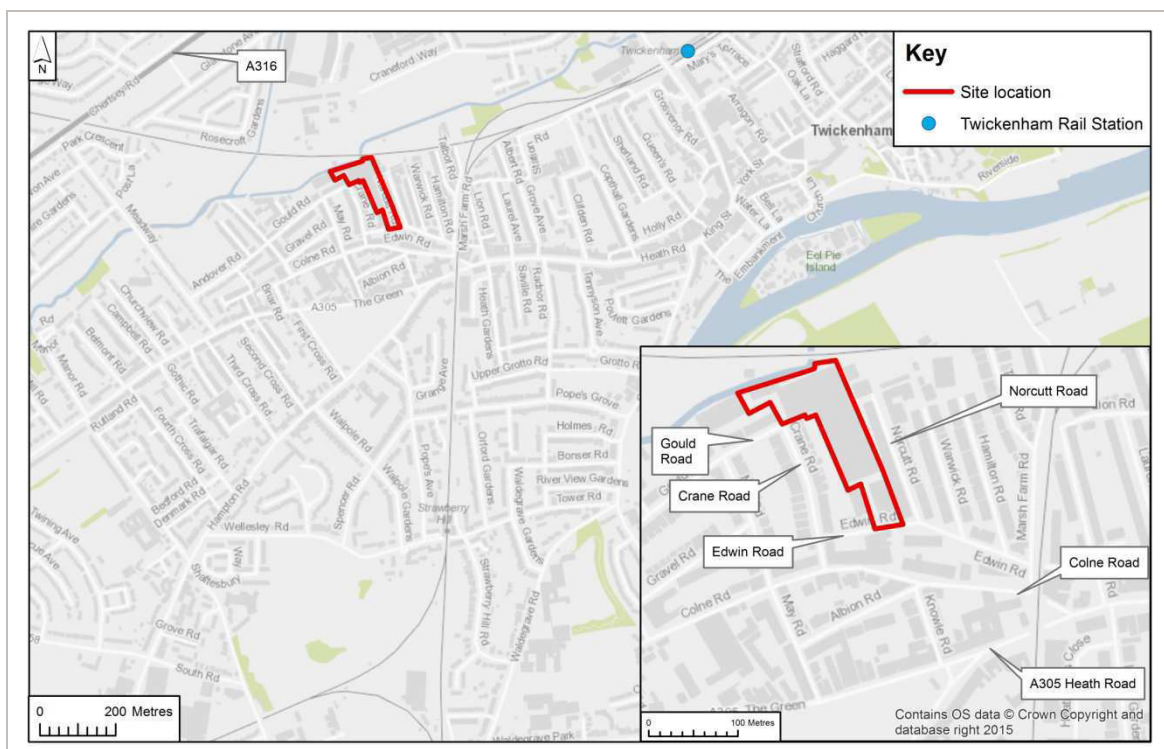
### INTRODUCTION

- 3.1 This section of the TS describes the existing or baseline transport conditions at the existing site and in the surrounding area. The baseline conditions need to be established to fully understand the context of the proposed change of use and the associated traffic and transport impacts.

### SITE LOCATION AND LOCAL HIGHWAY NETWORK

- 3.2 This section will review the local roads on the local highway network identified as key to the Greggs operations in Twickenham.
- 3.3 The site is bounded by Edwin Road to the south, the existing residential streets of Crane Road and Norcutt Road to the west and east, respectively, and the River Crane and railway lines to the north. The site is accessed via two simple priority junctions; one at the intersection of Gould Road and Crane Road, and the other on Edwin Road.
- 3.4 The site's location in the context of the wider local highway network is shown in Figure 3.1.

**Figure 3.1: Site location and local highway network**



- 3.5 The site is currently used as a production facility for Greggs Bakery and has two vehicular accesses; one on Edwin Road and the other on Gould Road. The site access on Edwin Road is approximately 7.7m wide and takes the form of a priority junction, as shown in
- 3.6 Figure 3.2. This access is the primary point of access to the site for heavy goods vehicles (HGVs) and bakery deliveries. The access on Gould Road, shown in Figure 3.3, is a priority junction at the point where Gould Road and Crane Road meet, and serves as the primary access for cars and office related



deliveries by light goods vehicles (LGVs). The access is approximately 5.0m wide. Good visibility can be achieved from both of the accesses in each direction. However, it should be noted that cars parked too close to the junctions can cause a reduction in the visibility achievable.

**Figure 3.2: Site access on Edwin Road**



**Figure 3.3: Site access on Gould Road at its intersection with Crane Road**



- 3.7 Both Gould Road and Crane Road are quiet Victorian terraced residential streets, which both have a carriageway width of approximately 7.2m. The roads experience on-street parking on both sides of the carriageway resulting in vehicles in only one direction being able to use the road at once due to it having a usable width of approximately 3.4m. As the road is not a major through-route for traffic this does not

appear to cause significant issues with congestion. The road is not part of a Controlled Parking Zone (CPZ) although there are double yellow lines on both sides of the carriageway where both roads meet in the vicinity of the site access. Figure 3.4 and Figure 3.5 show the existing situation on Gould Road and Crane Road, respectively.

**Figure 3.4: On-street parking on Gould Road**



**Figure 3.5: On-street parking on Crane Road**



- 3.8 Approximately 140m to the south of the site access on Gould Road, Edwin Road forms a priority T-junction with Crane Road, as shown on Figure 3.6. Cars park opposite the junction reducing the available space that larger vehicles may need to complete the turn. The junction is located approximately 65m to the west of the site access on Edwin Road and has a sign stating that it is 'Unsuitable for HGVs'.



**Figure 3.6: Priority T-junction of Edwin Road and Crane Road**

- 3.9 The western end of Edwin Road is characterised by the industrial use of the Greggs Bakery and light industrial land uses associated with a number of vehicle maintenance garages. In the vicinity of the site access, the road has a carriageway width of approximately 7.1m. There are double yellow lines painted on the northern side of the carriageway along the frontage of the bakery and the neighbouring garage, and on the southern side along the frontage of the three vehicle maintenance garages. Elsewhere there are no restrictions and as a result the road experiences significant un-restricted on-street parking. To the west of the Greggs access, parked cars are solely on the carriageway but to the east, cars on the northern side of the carriageway were observed parking partially on the footway, as shown in Figure 3.7. This is likely to be a result of drivers trying to reduce the potential for conflict with HGVs accessing the Greggs site. Despite some restrictions, cars are still able to park to within approximately 4.0m of the access on the northern side of the carriageway, creating the potential for conflict with HGVs accessing and egressing from the site.

**Figure 3.7: On-street parking on Edwin Road**

- 3.10 To the east of Norcutt Road, Edwin Road is predominantly residential, with a mixture of flats and houses, and has a carriageway width of approximately 7.5m. Similarly to the surrounding roads, this section of Edwin Road experiences significant on-street parking on both sides of the carriageway, resulting in a useable carriageway width of approximately 3.7m which is sufficient for one vehicle to pass despite the road allowing two-directional traffic.
- 3.11 At its far eastern end, Edwin Road becomes Marsh Farm Road before forming a priority T-junction with Colne Road. Marsh Farm Road is a two-directional road and has a carriageway width of 4.6m with

double yellow lines on both sides of the carriageway. The transition from Edwin Road to Marsh Farm Road comprises an almost 90° blind bend which as shown in Figure 3.8 is not suitable for frequent HGV use due to its narrow nature which requires HGVs to use the entire width of the carriageway and partially mount the kerb to make the manoeuvre.

**Figure 3.8: HGV negotiating corner between Marsh Farm Road and Edwin Road**



- 3.12 The junction of Marsh Farm Road and Colne Road comprises a minor priority T-junction to the west of a railway bridge with a height restriction of 13'6", as shown in Figure 3.9. In the vicinity of the junction, Colne Road has a carriageway width of approximately 5.1m. Due to the confined nature of the junction and the narrow width of both roads, vehicles turning into Marsh Farm Road from Colne Road occupy both lanes while making the manoeuvre presenting a risk to other oncoming vehicles. It should also be noted that the visibility to the east of the junction is restricted due to obstruction caused by the railway bridge, as shown in Figure 3.10. This causes significant risk of conflicts between other road users and HGVs.



**Figure 3.9: Height restriction for bridge on Colne Road**



**Figure 3.10: Junction of Marsh Farm Road / Colne Road**



- 3.13 The priority T-junction of Colne Road and Heath Road is the point of access for HGVs from the wider highway network to the residential streets that provide access to the Greggs facility. Due to its priority nature, large vehicles turning right into or out of the junction may experience delays at peak times due to heavy traffic flows and needing to wait for gaps to manoeuvre. The junction is shown in Figure 3.11.

**Figure 3.11: Junction of Colne Road / A305 Heath Road**



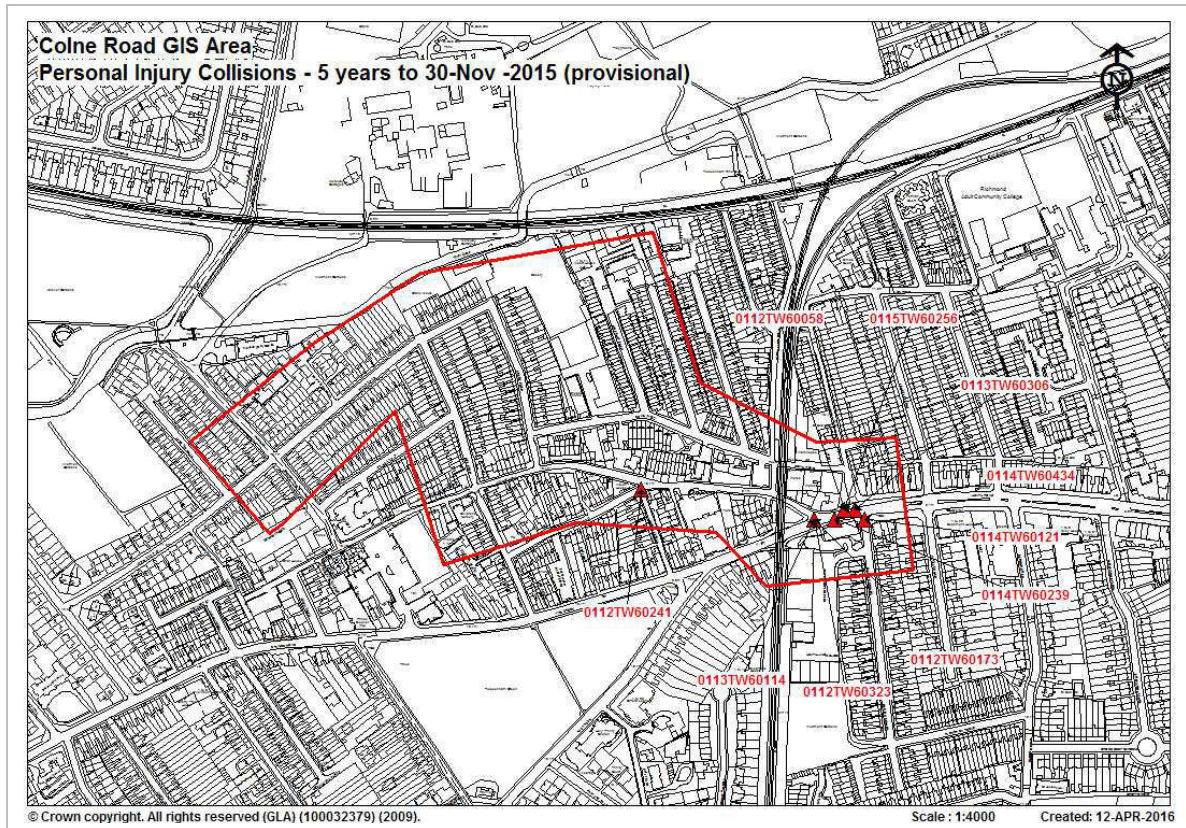
- 3.14 The on-street parking issues experienced on the roads in the vicinity of the site are a result of a number of factors in the local area. Most of the residential areas were designed in the Victoria era when cars were not commonplace. Therefore the roads are designed to be narrow and the dwellings do not have dedicated parking facilities, requiring residents to park on the road. The issue is compounded by the employment uses of Greggs and the vehicle maintenance garages, having insufficient parking capacity to cope with the demand from employees, visitors and customers. As such, additional on-street parking demand is generated by these uses. Due to the site's proximity to Twickenham Rail Station, there is also the potential that rail users are taking advantage of the unrestricted parking available on the road.
- 3.15 Vehicles travelling to and from the local and strategic road network to the site would route along the series of residential roads described above. These roads are aligned through residential areas and have housing fronting onto both sides of the carriageway along much of their lengths. These routes are unsuitable for high volumes of HGVs due to the detrimental impacts on residents in terms of noise, air quality and safety.

## COLLISION ANALYSIS

- 3.16 Personal Injury Accident Data (PIA) has been obtained from Transport for London (TfL) for the latest available five year period, covering the area surrounding the Greggs Bakery site. The study area includes Crane Road, May Road, Norcutt Road, Warwick Road, Edwin Road, Colne Road between Heath Road and May Road, the Heath Road crossroads with Lion Road and Heath Gardens and Gould Road between Crane Road and Mereway Road. The study area and full data output is included at Appendix B and the locations of the incidents are shown on Figure 3.12.



Figure 3.12: Map showing location of Personal Injury Accidents (PIA)



Source: Transport for London

- 3.17 A total of 10 injury accidents were recorded in the study area within the most recent available five year period (December 2010 to November 2015). Of the 10 injury accidents there was one serious injury accident and nine slight injury accidents. No fatal accidents were recorded in the vicinity of the site within the most recent five year period. Of the injury accidents five involved pedal cycles, three involved motorcycles, two involved pedestrians and two involved goods vehicles (>3.5 tonnes).
- 3.18 The serious injury accident took place on Heath Road close to its junction with Heath Gardens and involved a cyclist being struck by the door of a heavy goods vehicle (>7.5 tonnes).
- 3.19 A cluster of six injury accidents took place at the Heath Road crossroads with Lion Road and Heath Gardens. Of the six injury accidents, four involved motorcycles or pedal cycles being struck by vehicles turning right. The remaining two were the result of a pedestrian being struck by a vehicle and a pedal cycle being struck by the door of an HGV (detailed above). Each of the accidents involving vehicles turning right and colliding with pedal cycles or motorcycles at the junction are considered to be a result of driver / rider error, rather than as a result of a defect in the highway given the straight and well lit nature of the area.
- 3.20 A total of two injury accidents took place at the Colne Road junction with Heath Road. The first injury accident at this junction involved a medium sized goods vehicle (3.5-7.5 tonnes) turning left across the path of a cyclist, resulting in the cyclist falling off. The second injury accident at this junction involved a vehicle turning right as a motorcycle was overtaking.
- 3.21 An analysis of the injury accidents that occurred within the study area suggests that there are no common contributory factors to the injury accidents that occurred during the most recent five year study period. It is therefore considered that there are no existing road safety issues in the vicinity of the site that would be exacerbated as a result of the proposed redevelopment.



## PEDESTRIAN AND CYCLIST FACILITIES

- 3.22 To enable an assessment of the viability of walking between the site and key destinations in the local area it is appropriate to establish the maximum distance that people are generally prepared to walk and the destinations that exist within these distances.
- 3.23 The Institute of Highways and Transportation's (IHT's) guidance, Guidelines for Providing for Journeys on Foot (2000) states in paragraph 3.32 and Table 3.2 that the preferred maximum walking distance to facilities and local services is circa two kilometres. The distances for various land uses, are summarised in Table 3.1.

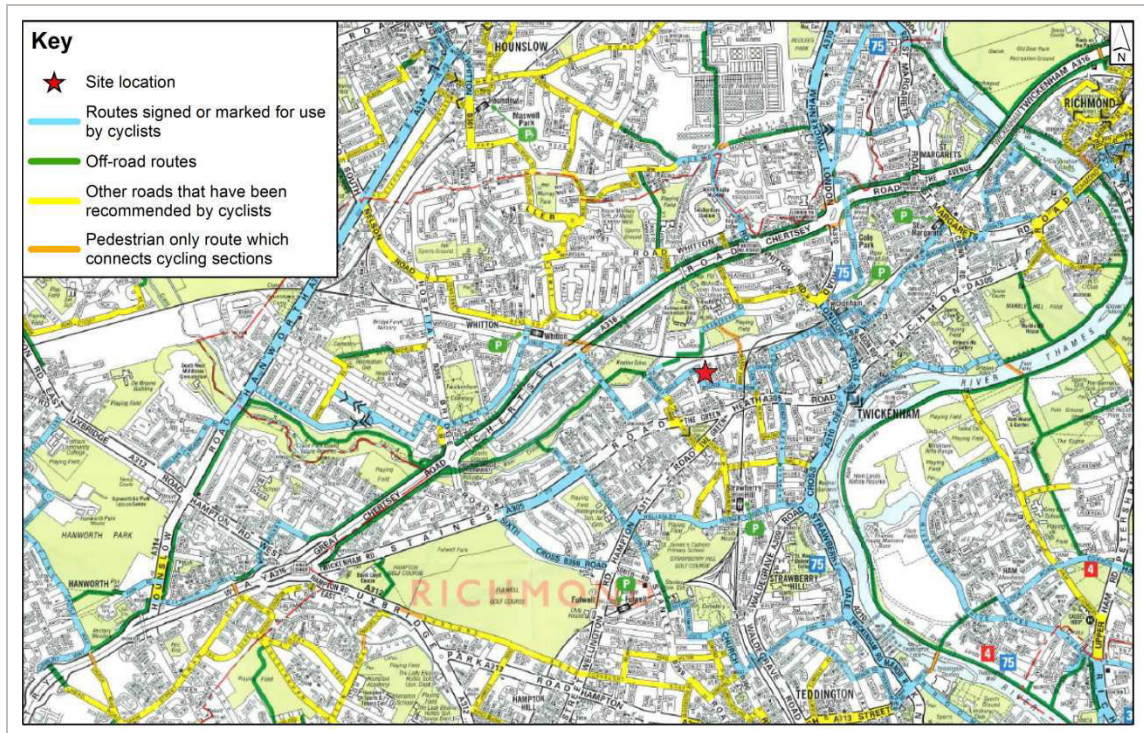
**Table 3.1: Suggested acceptable walking distances**

Definition	Town centres	Commuting / schools	Elsewhere
Desirable	200m	500m	400m
Acceptable	400m	1,000m	800m
Preferred	800m	2,000m	1,200m

*Source: Providing for Journeys on Foot (IHT, 2000)*

- 3.24 The area in the vicinity of the site has good pedestrian facilities with well-established lit footways which provide access to a wide range of local community, education, health, retail and employment facilities. The footways are approximately 1.8m wide, however it should be noted that on Edwin Road the northern footway is slightly narrower due to cars parking partially on the footway.
- 3.25 Cycling is considered an important mode of sustainable travel and is generally considered suitable for distances of up to 3 miles (4.8km) for regular journeys in urban areas, and 5 miles (8km) for commuting journeys (source: LTN 2/08, Cycle Infrastructure Design).
- 3.26 Transport for London (TfL) accessibility guidance assumes that, on average, cyclists travel at a speed of 14.4 kilometres per hour (9 miles per hour); this equates to a cycling speed of 240 metres per minute. On this basis it can be considered that any destination under 2.5 kilometres is within approximately a 10 minute cycle ride of the redevelopment site.
- 3.27 The site benefits from numerous formalised and recommended routes within close vicinity. Routes around the site are illustrated within Local Cycling Guide 9 (2015) produced by TfL for the area surrounding the site including Hounslow, Heathrow, Feltham, Twickenham, Wandsworth, Richmond, Kingston, Surbiton and Wimbledon. The cycle guide has been reproduced for the area surrounding the site in Figure 3.13.

Figure 3.13: Local cycle network



Source: Transport for London

- 3.28 Locally there are continuous light blue or yellow ('signed' or 'TfL recommended') cycle routes on Gould Road, Crane Road, Edwin Road, Lion Road, Station Road, Andover Road and Meadway. The key off-road (green) route along the A316 towards Central London can be accessed via a link crossing the river to the north of Marsh Farm Road, or via a link north of Gould Road. Together these provide connections to various residential areas and amenities as well as a public transport interchange at Twickenham.
- 3.29 The level of accessibility at the site to formal cycle facilities and the number of services, residential areas and public transport interchanges that can be reached within a reasonable cycle distance ensure that cycling is a viable mode to and from the site and can readily form part of a multi-modal trip. The local topography is not considered to impede travel by walking or cycling in the local area.

## PUBLIC TRANSPORT NETWORK

### Public Transport Accessibility Level (PTAL)

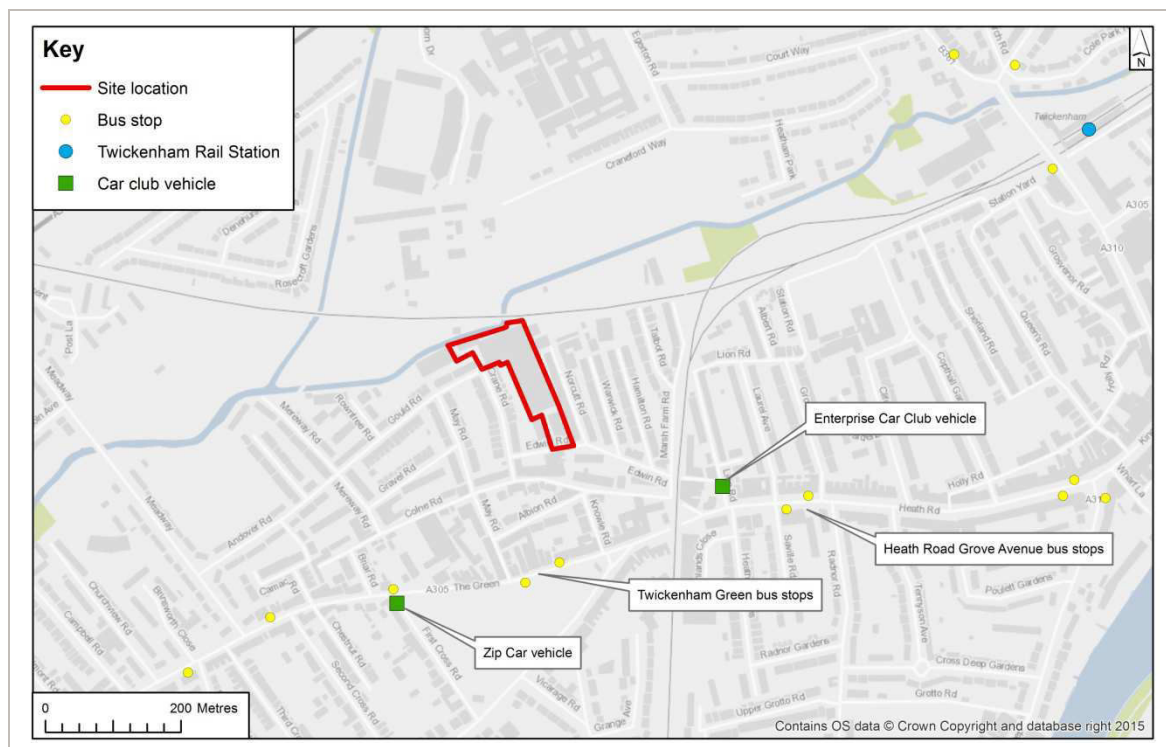
- 3.30 The PTAL assessment is a detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability. This provides a method of measuring the density of the public transport network at any location within Greater London. This method has been agreed by the London Borough-led PTAL development group as the most appropriate for use across London, and is set out in the TfL document Measuring Public Transport Accessibility Levels published in April 2010.
- 3.31 PTAL considers the walking time to public transport access points, the reliability of the service modes available, the number of services available within the catchment, and the level of service (i.e. average waiting time). The PTAL is categorised in 6 levels, where 6 represents a high level of accessibility and 1 a low level of accessibility.

- 3.32 The PTAL of the proposed redevelopment site has been calculated using the TfL tool WebCAT. The database indicates that the site has a PTAL of 2, which represents a 'poor' level of accessibility to public transport. The PTAL report is provided at Appendix C.
- 3.33 The PTAL score does not take into consideration the location of the redevelopment site adjacent to good walking and cycling links or its proximity to a number of services, amenities or residential areas within Twickenham. A range of key destinations can be accessed by a number of travel modes providing potential site users with a real and genuine choice of travel modes without needing to rely on the private car.

### Local bus connections

- 3.34 The proposed redevelopment site lies within close proximity to good existing public transport routes. PTAL guidance considers that people are willing to walk up to eight minutes in order to access bus stop infrastructure. It also assumes that, on average, pedestrians will walk at a speed of 4.8 kilometres per hour (3 miles per hour) whilst travelling to a bus stop. This equates to a walking speed of 80 metres per minute. Thus, TfL consider that bus stops within 640 metres of a development (80 metres x 8 minutes) are considered to be accessible.
- 3.35 As shown on Figure 3.14, the closest bus stops to the site are the Twickenham Green stops approximately 450m to the south of the site and the Heath Road Grove Avenue stops, approximately 550m to the southeast of the site. The Heath Road Grove Avenue stops and the westbound stop at Twickenham Green include shelters, seating and timetable information. The northbound stop at Twickenham Green has timetable information.

**Figure 3.14: Sustainable transport network**



- 3.36 The services from these stops offer a minimum daytime combined frequency of 37 buses every hour, providing frequent and direct connections with various locations in London including Isleworth, Hammersmith, Kingston, Fulwell, Hounslow, Staines, Richmond and Heathrow. The stops are also served by a night bus service (N22) between Piccadilly Circus and Fulwell which has a frequency of

every 30 minutes. A summary of the bus services which stop at the Twickenham Green and Heath Road Grove Avenue stops is provided in Table 3.2. The table also highlights which stops can be used to access Twickenham Rail Station.

- 3.37 The level of accessibility to frequent bus services to a wide range of locations and destinations ensures that travel to and from the site by bus is a viable mode and can readily form part of a multi-modal trip involving National Rail.

**Table 3.2: Summary of bus services**

No.	Route	Stops served	Approx. frequency	Serves Twickenham Rail Station?
110	Arragon Road – West Middlesex Hospital	Twickenham Green, Heath Road Grove Avenue	Every 20 minutes	✗
267	Hammersmith Bus Station – Fulwell Bus Garage	Heath Road Grove Avenue	Every 8-12 minutes	✓
281	Tolworth Tower – Hounslow Bus Station	Heath Road Grove Avenue	Every 7-9 minutes	✓
290	Arragon Road – Staines Bus Station	Heath Road Grove Avenue	Every 20 minutes	✗
490	Pools on The Park – Heathrow Terminal 5	Twickenham Green, Heath Road Grove Avenue	Every 8-13 minutes	✗
H22	The Bell - Manor Road	Twickenham Green, Heath Road Grove Avenue	Every 10-13 minutes	✗
N22	South Road / Fulwell – Piccadilly Circus	Heath Road Grove Avenue	Night bus – every 30 minutes	✗
R70	Nurserylands Shopping Centre – Richmond / Manor Road	Heath Road Grove Avenue	Every 9-11 minutes	✗

Source: Transport for London (13/04/2016)

### National Rail connections

- 3.38 As shown on Figure 3.14, Twickenham National Rail Station is located approximately 1.2km east of the site. National Rail services operated by South West Trains provide connections from London Waterloo to Reading, Windsor and the Kingston and Hounslow Loop Lines. The station can be accessed within a 15 minute walk, a five minute cycle or a five minute bus ride using either the 267 or 281 services.
- 3.39 A summary of key National Rail services from Twickenham Rail Station is provided in Table 3.3.

**Table 3.3: Summary of rail services from Twickenham Rail Station**

Destination	Approx. journey time	Frequency
Richmond upon Thames	5 minutes	12 in the AM peak and 11 returning in the PM
Clapham Junction	15 minutes	17 in the AM peak and 16 returning in the PM
Kingston	13 minutes	17 in the AM peak and 16 returning in the PM
London Waterloo	30 minutes	3 in the AM peak and 2 returning in the PM

Source: National Rail (13/04/2016)



## CAR CLUBS

- 3.40 In the coming years, London faces challenges of population growth, congestion and the environment. Car clubs provide a cost-effective and flexible alternative to owning a car, and can help tackle these challenges. Car clubs provide the convenience of owning a car without the hassle or costs of repairs, servicing or parking. Members can book cars locally for just an hour, up to a whole weekend, or longer. They reduce the need for people to own their own cars by providing access to conveniently located, high-quality vehicles on an affordable 'pay-as-you drive' basis.
- 3.41 The nearest existing car club, is Enterprise Car Club ([www.enterpriseclub.co.uk](http://www.enterpriseclub.co.uk)) which has a car approximately 375m east of the site on Lion Road. There is an additional car club space on First Cross Road, operated by Zip Car ([www.zipcar.co.uk](http://www.zipcar.co.uk)) approximately 550m southwest of the site. The locations of the car clubs in the vicinity of the site are shown on Figure 3.14.

## EXISTING MODAL SHARE

- 3.42 The site is located within the two Mid-level Super Output Area of E02000799 and E02000797, which have been used as a proxy to determine how residents in the local area travel to work. Table 3.4 shows how the existing residents of this area currently travel to work, as obtained from 2011 Census Journey to Work data.

**Table 3.4: Residents' Method of Travel to Work (MSOA E02000799 and E02000797)**

Mode	Percent
Underground	6
Train	34
Bus	8
Taxi	0
Motorcycle	1
Car Driver	32
Car Passenger	1
Bicycle	7
On Foot	11
Other	0
<b>TOTAL</b>	<b>100%</b>

- 3.43 The data shows that 48% of residents in the local area use public transport to travel to work with the train (34%) and bus (8%) being the most popular modes, followed by the Underground (6%). Sustainable modes such as walking (7%) and cycling (11%) make up nearly a fifth of all trips. Only 32% of residents travel to work by private car, with an additional 1% car sharing. The remainder of people travel by taxi (1%), motorcycle (1%) or other (<1%) modes. Table 3.5 shows how people who are employed within the MSOAs of E02000799 and E02000797 travel to work, as calculated using 2011 Census Journey to Work data.

**Table 3.5: Employees' Method of Travel to Work (MSOA E02000799 and E02000797)**

Mode	Percent
Underground	4
Train	16
Bus	16
Taxi	0
Motorcycle	1
Car Driver	41
Car Passenger	2
Bicycle	7
On Foot	12
Other	1
<b>TOTAL</b>	<b>100%</b>

- 3.44 The data shows that 36% of people employed in the MSOAs analysed use public transport to travel to work with the train (16%) and bus (16%) being the most popular modes, followed by the Underground (4%). Sustainable modes such as walking (12%) and cycling (7%) make up nearly a fifth of all trips. Approximately 41% of employees travel to work by private car, with an additional 2% car sharing. The remainder of employees travel by motorcycle (1%), taxi (<1%) or other modes (1%).
- 3.45 It is therefore considered that the modal split shows a large proportion of local residents currently travel to work by sustainable means (68%). This is considered to reflect the availability of local public transport facilities.

## SUMMARY

- 3.46 This section has evaluated the existing transport and highway conditions in the vicinity of the site and shown that:
- The site is in a sustainable and accessible location with strong connections by foot, cycle and public transport connecting the area to a variety of local facilities and amenities;
  - The site is located just over a five minute walk from a number of bus services and within a 15 minute walk of Twickenham National Rail Station, connecting it to the wider London area;
  - The PIA data analysis identified no pattern of accidents in the vicinity of the site that suggests that there are no existing road safety issues in the vicinity of the site that would be exacerbated as a result of the proposed redevelopment;
  - The area surrounding the site is predominantly residential with a significant amount of on-street parking due to the lack of off-street parking provision resulting from the area's development in an era of low car prevalence; and
  - The highway network surrounding the site is characterised by narrow carriageways and tight junction radii typical of Victorian streets and the usable carriageway width of the Edwin Road, Colne Road and Crane Road is not suitable for frequent HGV movements.

## 4 Existing Site

### INTRODUCTION

- 4.1 This section summarises the existing and permitted use of the site, providing details of its operations and access arrangements.

### EXISTING SITE USE AND PERMITTED USE

- 4.2 The site is located to the northeast of the centre of Twickenham in West London and has two access points to the highway network; via Gould Road and Edwin Road. The site is bounded to the north by the River Crane and the railway line, to the east and west by residential areas, and to the south by Edwin Road which is currently characterised by residential and light industrial uses. A plan showing the location of the site in relation to the surrounding area is included as **Error! Reference source not found.**
- 4.3 The site currently comprises three buildings which house production facilities for Greggs, but is surplus to requirements and therefore is due to be closed. The site is currently used as industrial land and therefore while not suitable as a modern industrial site, could be occupied by industrial uses in the future should the proposed redevelopment not proceed.
- 4.4 The site has many of the typical characteristics of a Victorian factory, having expanded over time to the full capability of the original site and is now constrained for further expansion and the existing operations.

### EMPLOYEES

- 4.5 The Greggs site currently employs 225 staff in total including factory staff and administration / management staff. The factory employees work across five different shifts covering a 24 hour period seven days a week and therefore the full workforce is never on-site at the same time. Table 4.1 below details the bakery's current shifts and the number of staff on average working at each time.

**Table 4.1: Summary of Greggs Bakery shifts and employees**

Shift	Number of employees working
06:30 – 15:30	43
07:00 – 16:00	32
14:00 – 23:00	15
15:30 – 00:30	22
00:00 – 09:00	15

- 4.6 In addition to the bakery's factory staff, there is an administration and management team who work general office hours within the range of 07:00-18:00. The number of management / admin staff on-site varies but averages approximately 20 per day.

### CAR AND CYCLE PARKING

- 4.7 The car and cycle parking on-site can be accessed from the Gould Road entrance. There are 25 marked car parking spaces, however typically an additional extra 10 vehicles are parked informally on-site by blocking other cars in. There is a sheltered cycle storage area on-site which has the capacity for 18 cycles.



- 4.8 Information provided by the client suggests that employees frequently park their cars on the surrounding residential streets due to the limited number of spaces provided on-site. This is most common for employees who work on the afternoon and evening shifts and arrive when the day shift is still on-site.
- 4.9 The dissatisfaction of local residents with Gregg's employees parking on the surrounding streets is an issue that has been highlighted in local news stories in addition to ongoing issues with litter and congestion<sup>1</sup>.

## DELIVERIES AND SERVICING

### Frequency

- 4.10 The access on Edwin Road serves as the primary access for HGVs and deliveries for the factory. Greggs receives approximately 20 deliveries on average each weekday and five deliveries each day on a weekend, all of which are undertaken by HGV. The first five deliveries of each day take place before 07:00, and the remaining deliveries on weekday all take place in the morning where possible. The site can accommodate approximately five HGVs at a time and vehicles are required to reverse into the site access from Edwin Road.
- 4.11 The site receives approximately five deliveries of office goods and materials each day via the Gould Road access. These deliveries are made by couriers in LGVs.

### Vehicle routing

- 4.12 All Greggs drivers and companies who deliver to the site are provided with a site access plan and instructions for accessing the site using the local highway network. The instructions provided to delivery drivers are to access the site via the A305, Colne Road and Edwin Road. Drivers are requested not to follow vehicle navigation systems as these may lead them along a different route.

### Congestion

- 4.13 A local news article<sup>2</sup> published in February 2012 reported that a Greggs delivery vehicle had been attacked at the site with a number of items thrown at the vehicle. The attack was linked to ongoing frustration from residents about the disruption caused by the bakery and its operations. The article states that neighbours have complained about the noise and congestion caused by HGVs parking along Edwin Road while they wait to access the site. It reports that a local resident stated that the busiest times for deliveries are at midnight, 02:00 and 05:00, which generate a significant disruption for residents.
- 4.14 JMP undertook a site visit on Tuesday 29<sup>th</sup> March 2016 and witnessed the disruption caused by frequent HGV deliveries to the bakery. At the time of the visit three vehicles were waiting to access the site as shown in Figure 4.1. At one point a HGV was exiting the site and due to the narrow nature of Edwin Road, a waiting HGV was required to turn into the residential Norcutt Road to provide the vehicle with enough room to pass. This caused significant disruption to an otherwise quiet residential area as shown on Figure 4.2.

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<sup>1</sup> [http://www.richmondandtwickenhamtimes.co.uk/news/9553609.Bunfight\\_breaks\\_out\\_over\\_Greggs\\_the\\_baker/](http://www.richmondandtwickenhamtimes.co.uk/news/9553609.Bunfight_breaks_out_over_Greggs_the_baker/)

<sup>2</sup> as above

**Figure 4.1: HGVs waiting to access the bakery via Edwin Road and blocking the carriageway**



**Figure 4.2: HGV turning in Norcutt Road to allow other HGVs to pass**



### Site access

- 4.15 Due to the on-street parking and the proximity of the site access on Edwin Road to the main carriageway, HGVs are often not able to turn into the site. Due to its confined nature, HGVs are not able to turn around inside the site and therefore are required to reverse into the access from Edwin Road. This presents a significant risk and can conflict with other road users, including the cars parked or waiting directly outside the access, cyclists and pedestrians. These manoeuvres are highly disruptive to the surrounding residential area causing congestion and delays to road users and pedestrians on Edwin Road and the surrounding residential roads that feed onto it.
- 4.16 The Freight Transport Association (FTA) design guidance 'Designing for deliveries' (2006) states that two-way access roads should be 'sufficient to accommodate the swept paths of two vehicles passing in opposite directions' with safety margins between the two vehicles and any vertical obstruction close to the carriageway edge. The document states that the total 'minimum' width of most existing two-way

straight sections of access roads is 7.3m based upon a standard vehicle width of 2.5m. On right-angled bends, such as that between Edwin Road and Marsh Farm Road, the document recommends that at the apex of the bend there is a carriageway width of 12.9m with a radius of 15m.

- 4.17 The useable carriageway width on Edwin Road is 3.3m due to on-street parking, which is below this FTA guideline and therefore indicates the likelihood of conflicts between HGVs and parked cars. The reduced useable carriageway width due to restricted space and parked cars, particularly in the vicinity of junctions and bends such as that between Edwin Road and Marsh Farm Road, and the site access on Edwin Road, makes access to industrial premises difficult, particularly for HGVs.
- 4.18 Swept path analysis has been undertaken for the area around the Edwin Road access for an articulated vehicle (16.5m) and a rigid truck, both with and without the on-street parking. These assessments represent a 'best case' scenario for access to the site by HGVs. Due to the narrow residential streets and confined access, HGVs are currently not permitted to access the site using the Gould Road access. However, swept path analysis has been undertaken for the access and the route between the site and Heath Road, the main road, to highlight its unsuitability for HGV access.
- 4.19 As shown on JMP Drawings ST17096-01 and ST17096-02 included in Appendix D, both the articulated and rigid vehicles experience difficulties at the junction of Colne Road / Marsh Farm Road and Edwin Road / Marsh Farm Road due to tight junction and corner radii which causes the vehicles to overshoot the kerblines and mount the kerb to make the manoeuvre. As shown on the drawings, the vehicles occupy almost all of the useable carriageway on Edwin Road, leaving little margin for error before potentially conflicting with parked cars.
- 4.20 Vehicles are required to reverse into the site, which as shown on Drawing ST17096-01 cannot be completed without the articulated vehicle going over the kerblines to complete the manoeuvre. In the event that cars are parked too close to the junction it is likely that the HGVs would be unable to complete the manoeuvre without clashing with parked cars. When egressing from the site, the articulated vehicle cannot do so without going over the kerblines and has little space to straighten up before reaching the parked cars on the southern side of the carriageway. As such, if cars were illegally parked or pulled over on the yellow lines there would inevitably be conflicts with HGVs accessing the site.
- 4.21 The existing site is not considered appropriate for future development as a modern industrial site due to restricted HGV access as a result of significant levels of on-street parking on Edwin Road, Gould Road and Crane Road. As such redevelopment for industrial-related employment purposes will present a highway safety issue due to the current substandard access for HGVs.

## SUMMARY

- 4.22 This section has provided a summary of the site's existing and permitted use and details of the existing site's operations, showing that:
- The site is surplus to Greggs' requirements and is therefore due to be closed;
  - The site is currently used as industrial land and therefore while not suitable as a modern industrial site, such uses could continue if the site is not redeveloped;
  - The site currently employs 225 staff in total, including factory and administrative / management staff. Factory staff work five shifts spread across the whole 24 hour period seven days a week and administrative / management staff work between 07:00-18:00;
  - The facility services approximately 25 deliveries and collections per day, including 20 for the factory goods in the morning via Edwin Road by HGVs and five containing office supplies via Gould Road via LGVs;

- The HGV traffic generated by the factory cause significant disruption to the surrounding residential areas, including noise and traffic congestion along Edwin Road while the vehicles wait to access the site; and
- The route taken by HGVs between Heath Road and the site is not suitable for frequent HGV use due to the narrow useable width of the carriageway and the narrow nature of junctions and corners along the route. Swept path analysis has shown that HGVs can only manoeuvre between Edwin Road and Colne Road by mounting the kerb due to the space constraints on the existing highway.

## 5 Redevelopment Proposals

### INTRODUCTION

- 5.1 This chapter of the TS considered the proposed redevelopment in terms of scale, land use, the site's access arrangements and car and cycle parking.

### PROPOSED REDEVELOPMENT

- 5.2 The proposed redevelopment will replace the existing Greggs Bakery production facilities and ancillary office space with 96 residential units and 2,757m<sup>2</sup> of commercial start-up space. The residential units are proposed to be a mixture of apartments, townhouses and mews houses. A full breakdown by residential unit size and type is provided in Table 5.1 below and the development masterplan is included in Appendix A.

**Table 5.1: Summary of residential development quantum**

Type of dwelling	Number of bedrooms	Quantity provided
Flat	1 bedroom	9
	2 bedrooms	52
Mews house	2 bedrooms	2
Townhouse	3 bedrooms	15
	4 bedrooms	18
<b>Total</b>	<b>-</b>	<b>96</b>

- 5.3 The apartments are proposed to be spread across three separate buildings, the largest of which (Block C) would be six storeys and located in the northeastern corner of the site. Two smaller blocks, one with two storeys (Block B) and the other with three storeys (Block A), would be situated in the southeastern and southwestern corners of the site, off Edwin Road. A new residential street would connect the northern and southern blocks of flats, along which the three and four storey townhouses and mews houses would be arranged.
- 5.4 The commercial start-up space is proposed to be located in the northwestern corner of the site, off Gould Road, and would be between three and four storeys high.

### ACCESS ARRANGEMENTS

- 5.5 The existing vehicular access at the point where Gould Road and Crane road meet would be retained and would become the primary point of access for the commercial start-up space. The access would take the form of a simple priority T-junction.
- 5.6 The principle of obtaining access from Edwin Road would be retained; however the proposed priority T-junction would be located slightly to the east of the existing access to the bakery. This access would be the primary point of access for the residential element of the scheme.
- 5.7 As shown on the development masterplan included in Appendix A, the priority T-junctions on Gould Road and Edwin Road would be linked by an internal road which provides access to the all elements of the scheme.

- 5.8 It should be noted that both the internal road and access junctions will be designed in accordance with the principles in Manual for Streets (2007) and will ensure that suitable visibility is achieved and that pedestrian and cycle movements are fully considered.
- 5.9 Pedestrian and cycle access will be provided at both the Gould Road and Edwin Road accesses with a footway provided on the western side of the Edwin Road access and on the eastern side of the Gould Road access. Footways will be provided on both sides of the internal road network and pedestrian and cycle movement will be prioritised through the design process.

## PARKING PROVISION

- 5.10 Each residential unit on site will have allocated car parking which will be in line with the parking standards included in the London Plan and LBRuT DMP for residential development. Apartment blocks A and B will have spaces allocated which are external to the buildings, while Block C will have one storey of undercroft parking provided below the apartment block. The houses will provide allocated parking through a mixture of driveway spaces and garages.
- 5.11 The commercial start-up units will have undercroft parking below the three-storey section of the building. This will be provided in line with the LBRuT and London Plan standards as set out in Chapter 2.

## SUMMARY

- 5.12 This chapter has summarised the redevelopment proposals for the Greggs site in Twickenham and shown that the proposals comprise:
- The development of 96 residential units and 2,757m<sup>2</sup> of commercial start-up space;
  - The retention of the Gould Road vehicular access and the principle of accessing the site via Edwin Road, and the provision of an internal road connecting the two accesses;
  - Pedestrian and cycle accesses via both Gould Road and Edwin Road, and the prioritisation of pedestrian and cycle movement throughout the site; and
  - Car and cycle parking in line with the London Plan, including the provision of undercroft parking for the commercial space and for one of the three apartment blocks.



## 6 Multi-modal Trip Generation

### INTRODUCTION

- 6.1 This chapter of the TS provides an overview of the trip generation and potential travel patterns that are anticipated to occur as a result of the proposed redevelopment. Consideration is given to trips associated with the site's existing operation, its permitted use and its proposed future use.

### EXISTING SITE

- 6.2 As the site is currently still in operation, staff and delivery trip information has been obtained from the Greggs Bakery Manager. Using the information provided about staff shifts, employee numbers and delivery patterns (summarised in Chapter 4), first principles were used to estimate the number of trips in the AM peak (08:00-09:00), PM peak (17:00-18:00) and across a 12 hour period between 07:00-19:00 for cars/LGVs and HGVs. The following assumptions were made based upon the information provided:
- 50% of office staff work 09:00-18:00, 25% of office staff work 07:00-16:00 and 25% of office staff work 08:00-17:00;
  - 41% of factory and office / admin staff drive to the site based upon Census 2011 Journey to Work data for the Twickenham MSOAs in which the site is located (E02000799 and E02000797);
  - Edwin Road HGV deliveries – five before 07:00, and the remaining 15 spread evenly between 07:00-11:00;
  - Gould Road LGV deliveries – three are in the morning and two are in the afternoon; and
  - All deliveries are turned around within the hour.
- 6.3 Due to the difficulty defining more casual and irregular trips generated by the site, such as visitors to the site and staff leaving the site during their breaks, these trips have been excluded from the analysis. It should be noted however that the actual trip generation of the site is likely to be higher than the values calculated due to the omission of these trips.
- 6.4 The estimated trip generation of the site is summarised in Table 6.1.

**Table 6.1: Existing site vehicular trip generation**

Trip type	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Factory based staff (cars)	0	6	6	0	0	0	15	37	52
Office / admin staff (cars)	4	0	4	0	2	2	6	8	14
Non-bakery deliveries (LGVs)	1	1	2	0	0	0	5	5	10
Bakery deliveries (HGVs)	4	4	8	0	0	0	20	20	40
<b>Total cars /</b>	<b>5</b>	<b>7</b>	<b>12</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>26</b>	<b>50</b>	<b>76</b>



Trip type	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
LGVs trips									
Total trips	9	11	20	0	2	2	46	70	116

6.5 The results show that across both peak periods there are 22 total vehicular movements, of which eight are made by HGVs. Across the 12 hour period between 07:00-19:00, there are 116 vehicle movements, of which 40 are made by HGVs.

6.6 Using the total number of car/LGV trips in Table 6.1 and the Census 2011 Journey to Work destination data for the Twickenham MSOAs in which the site is located (E02000799 and E02000797) as a proxy, the multi-modal trip generation of site employees was calculated. The mode shares calculated for the Twickenham MSOAs as a destination are included in Table 3.5 and the multi-modal trip generation is summarised in Table 6.2.

**Table 6.2: Existing site multi-modal trip generation**

Mode	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Car driver	5	7	12	0	2	2	26	50	76
Car passenger	0	0	1	0	0	0	1	2	4
Tube	0	1	1	0	0	0	3	5	7
Train	2	3	5	0	1	1	10	20	30
Bus	2	3	5	0	1	1	10	20	30
Taxi	0	0	0	0	0	0	0	0	0
Motorcycle	0	0	0	0	0	0	1	1	2
Cycle	1	1	2	0	0	0	5	9	13
Walk	1	2	3	0	1	1	8	14	22
Other	0	0	0	0	0	0	0	0	0
Total	11	17	29	0	5	5	64	121	184

## PERMITTED USE

6.7 To determine any future trip generation from the site should it be retained for industrial uses once Greggs Bakery vacates, a trip rate search has been undertaken using the latest available TRICS database (version 7.3.1) using the following parameters:

- 02 Employment – Industrial Unit;
- Located in Greater London;
- Located in a suburban area or edge of town centre area;
- Survey date of 2008 onwards;
- Any weekday; and
- Sites with a GFA up to 6,000m<sup>2</sup>.

6.8 The only comparable industrial site available was a food production facility in Alperton, Brent (site BT-02-C-02), which has been used to calculate the vehicle trip generation for any future industrial use on the site. A summary of the trip rates for cars/LGVs and HGVs is provided in Table 6.3, with the full

TRICS outputs included in Appendix E. This assessment shows the level of trips that could be generated by another occupier within the same use classes as Gregg's current use.

**Table 6.3: Permitted industrial use trip rates**

Trip type		AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
		Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Cars	/	0.115	0.098	0.213	0.147	0.394	0.541	1.969	1.688	3.657
LGVs										
HGVs		0.016	0.049	0.065	0.016	0.000	0.016	0.458	0.473	0.931

- 6.9 Using the trip rates in Table 6.3 and the site's current Gross Floor Area (GFA) of 8,309m<sup>2</sup>, the number of trips estimated to be generated by any permitted future industrial use were calculated and are provided in Table 6.4.

**Table 6.4: Permitted industrial use vehicular trip generation (GFA 8,309m<sup>2</sup>)**

Trip type		AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
		Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Cars	/	10	8	18	12	33	45	164	140	304
LGVs										
HGVs		1	4	5	1	0	1	38	39	77
Total trips		11	12	23	13	33	46	202	179	381

- 6.10 The results show that across both peak periods there would be 69 total vehicular movements, of which two would be made by HGVs. Across the 12 hour period between 07:00-19:00, there would be 381 vehicle movements, of which 77 would be made by HGVs, almost double the number of HGV movements as the existing site.
- 6.11 Using the Census 2011 Journey to Work mode share data for the Twickenham MSOAs as a destination, the multi-modal trip generation for any permitted use of the site was calculated and is summarised in Table 6.5.

**Table 6.5: Permitted industrial use multi-modal trip generation**

Mode	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Car driver	10	8	18	12	33	45	164	140	304
Car passenger	0	0	1	1	2	2	8	7	15
Tube	1	1	2	1	3	4	16	13	29
Train	4	3	7	5	13	18	64	55	119
Bus	4	3	7	5	13	18	64	55	119
Taxi	0	0	0	0	0	0	1	1	1
Motorcycle	0	0	0	0	1	1	4	4	8
Cycle	2	1	3	2	6	8	29	25	53
Walk	3	2	5	3	10	13	47	40	88
Other	0	0	0	0	0	0	1	1	2
Total	24	19	44	29	80	109	398	340	738

## PROPOSED REDEVELOPMENT

- 6.12 The redevelopment proposals involve the redevelopment of the existing Greggs Bakery site with 96 residential units and 2,757m<sup>2</sup> of commercial start-up space. To determine any future trip generation from the redeveloped site, trip rates were obtained from the TRICS database for residential and employment uses, using certain parameters.
- 6.13 The following parameters were used to calculate the residential trip rates:
- 03 Residential – Mixed private / affordable housing;
  - Located in Greater London;
  - Located in a Suburban Area, Neighbourhood Centre or Edge of Town Centre;
  - Survey date of 2008 onwards; and
  - Any weekday.
- 6.14 The following parameters were used to calculate the commercial start-up space trip rates:
- 02 Employment – Office;
  - Located in Greater London;
  - Located in a Suburban Area, Neighbourhood Centre or Edge of Town Centre;
  - Survey date of 2008 onwards;
  - Any weekday; and
  - Sites with a GFA up to 5,000m<sup>2</sup>.
- 6.15 The residential and office TRICS sites included in the analysis are summarised in Table 6.6 and the trip rates are included in Table 6.7. The full TRICS outputs are provided in Appendix E.

**Table 6.6: Residential and employment TRICS sites**

Land use	Site	Location	No. Units	GFA (m <sup>2</sup> )
Residential	EG-03-M-02	Southall	143	-
Residential	HD-03-M-01	Hayes	45	-
Residential	HD-03-M-03	Hayes	261	-
Employment - office	BT-02-A-02	Wembley	-	4,750
Employment - office	IS-02-A-01	Islington	-	5,500
Employment - office	SK-02-A-02	Rotherithe	-	2,371

**Table 6.7: Proposed residential and employment TRICS trip rates**

Trip type	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Residential (cars / LGVs)	0.078	0.249	0.327	0.165	0.089	0.254	1.211	1.378	2.589
Residential (HGVs)	0.004	0.004	0.008	0.000	0.000	0.000	0.012	0.012	0.024
Commercial (cars / LGVs)	0.444	0.096	0.540	0.143	0.467	0.610	3.605	3.241	6.846

Trip type	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Commercial (HGVs)	0.000	0.000	0.000	0.000	0.000	0.000	0.024	0.024	0.048

- 6.16 Using the trip rates in Table 6.7 and the number of residential units (96 units) and GFA of the commercial space (2,757m<sup>2</sup>), the number of trips forecast to be generated by the proposed redevelopment were calculated and are provided in Table 6.8.

**Table 6.8: Proposed residential (96 units) and employment (GFA 2,757m<sup>2</sup>) vehicular trip generation**

Trip type	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Residential (cars / LGVs)	7	24	31	16	9	24	116	132	249
Residential (HGVs)	0	0	1	0	0	0	1	1	2
<b>Total residential</b>	<b>8</b>	<b>24</b>	<b>32</b>	<b>16</b>	<b>9</b>	<b>24</b>	<b>117</b>	<b>133</b>	<b>251</b>
Commercial (cars / LGVs)	12	3	15	4	13	17	99	89	189
Commercial (HGVs)	0	0	0	0	0	0	1	1	1
<b>Total commercial</b>	<b>12</b>	<b>3</b>	<b>15</b>	<b>4</b>	<b>13</b>	<b>17</b>	<b>100</b>	<b>90</b>	<b>190</b>
<b>Total cars / LGVs</b>	<b>20</b>	<b>27</b>	<b>46</b>	<b>20</b>	<b>21</b>	<b>41</b>	<b>218</b>	<b>222</b>	<b>440</b>
<b>Total HGVs</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>4</b>
<b>Total trips</b>	<b>20</b>	<b>27</b>	<b>47</b>	<b>20</b>	<b>21</b>	<b>41</b>	<b>220</b>	<b>223</b>	<b>443</b>

- 6.17 The results show that across both peak periods combined there would be 88 total vehicular movements, of which one would be made by an HGV. Across the 12 hour period between 07:00-19:00, there would be 443 vehicle movements, of which four would be made by HGVs, ten times fewer than the number of HGV movements made by the existing site.
- 6.18 Using 2011 Census Journey to Work data for the Twickenham MSOAs as an origin for the residential trips and as a destination for the employment trips, the multi-modal trip generation of the site was calculated and is summarised in Table 6.9.

**Table 6.9: Proposed residential (96 units) and employment (GFA 2,757m<sup>2</sup>) multi-modal trip generation**

Mode	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
Car driver	20	27	47	20	21	41	218	222	440
Car	1	2	3	2	1	3	12	13	25

Mode	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
passenger									
Tube	2	8	10	5	3	8	38	43	81
Train	11	38	49	25	14	39	182	207	389
Bus	5	18	23	12	7	19	88	100	188
Taxi	0	0	0	0	0	0	1	1	2
Motorcycle	0	2	2	1	1	2	8	9	18
Cycle	3	10	13	7	4	11	50	57	107
Walk	5	17	22	11	6	18	82	94	176
Other	0	0	0	0	0	0	1	2	3
<b>Total</b>	<b>48</b>	<b>123</b>	<b>171</b>	<b>84</b>	<b>57</b>	<b>141</b>	<b>680</b>	<b>748</b>	<b>1,428</b>

- 6.19 The results show that a total of almost 70% of employees and residents of the proposed redevelopment would travel to and from the site by sustainable modes, making it highly sustainable site in terms of transport.

## NET CHANGE IN VEHICLE TRIPS

### Scenario 1: Existing site and proposed redevelopment

- 6.20 To determine the net change in trips as a result of the proposed redevelopment, a comparison of the trip generation for the existing industrial site and the proposed residential and commercial redevelopment has been undertaken. The results are summarised in Table 6.10.

**Table 6.10: Net change in trips between existing site and proposed redevelopment**

Trip type	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
<b>Net change (cars / LGVs)</b>	+15	+20	+34	+20	+19	+39	+192	+172	+364
<b>Net change (HGVs)</b>	-4	-4	-8	0	0	0	-18	-18	-36
<b>Net change (total)</b>	<b>+11</b>	<b>+16</b>	<b>+32</b>	<b>+20</b>	<b>+19</b>	<b>+39</b>	<b>+114</b>	<b>+153</b>	<b>+327</b>

- 6.21 The comparison of the trip generation for the existing site and the proposed redevelopment shows that there is expected to be a net increase in light vehicle trips of 73 vehicles across both peak periods in total, which is equivalent to just over one additional vehicle every two minutes on average. While there would be a slight increase in light vehicles, the trips would be distributed between two accesses, rather than the one access for light vehicles, via Gould Road, that currently exists. As such, there would be an increase of just over one additional vehicle every four minutes from each access on average; which would be an imperceptible increase in traffic flow.
- 6.22 Changing the site to residential and commercial is estimated to lead to a reduction of 36 HGV movements across the 12 hour period assessed, of which eight would be in the AM peak period. This is a significant decrease in HGV movements considering the otherwise quiet residential nature of the surrounding area and the unsuitability of the local highway network to accommodate these trips. This

reduction would lead to a significant improvement in traffic flow on Edwin Road, where residents often experience congestion due to HGVs blocking the road while waiting to access the constrained Greggs site.

## Scenario 2: Existing site and permitted use

- 6.23 As the site is surplus to Greggs' operational requirements, they are planning to sell the site. Should it not be given permission for redevelopment to commercial and residential uses, the site has a permitted use for industrial uses and could be occupied by new industrial uses. As such a comparison between the trips generated by the existing site and any future industrial use has been undertaken and the results are summarised in Table 6.11.

**Table 6.11: Net change in trips between existing site and permitted industrial use**

Trip type	AM peak (08:00-09:00)			PM peak (17:00-18:00)			12 hour period (07:00-19:00)		
	Arrivals	Departure	Total	Arrivals	Departure	Total	Arrivals	Departure	Total
<b>Net change (cars / LGVs)</b>	+5	+1	+6	+12	+29	+43	+138	+90	+228
<b>Net change (HGVs)</b>	-3	0	-3	+1	0	+1	+18	+19	+33
<b>Net change (total)</b>	<b>+2</b>	<b>+1</b>	<b>+3</b>	<b>+14</b>	<b>+31</b>	<b>+44</b>	<b>+156</b>	<b>+110</b>	<b>+265</b>

- 6.24 The results show that the potential occupation of the site by another industrial user would lead to a total increase in 265 trips across the 12 hour period assessed compared to the existing use, of which 33 would be HGV movements. While this increase is slightly lower than if the site were redeveloped for residential and commercial uses, the difference in trips between the permitted use and the proposed use is 62 trips across the 12 hour period, which is on average five trips per hour. This is an imperceptible difference.
- 6.25 However, the difference in HGV movements between the permitted use and the proposed redevelopment is an increase of 69 movements across the 12 hour period if the site is continued to be used for industrial uses, which is equivalent to six additional HGV movements per hour on average along the already constrained Edwin Road. This would have a noticeable impact on the quality of the local environment for residents and would have a negative effect on the level of fear and intimidation experienced by vulnerable road users and overall residential amenity.

## SUMMARY

- 6.26 The multi-modal trip generation assessments for the existing, permitted and proposed uses of the site has shown that:
- Compared with the existing use, the proposed redevelopment would generate 73 additional light vehicle trips across both peak hours, which is just over one additional vehicle every two minutes or one additional vehicle every four minutes from each access on average, an imperceptible difference;
  - Compared with the existing use, the proposed redevelopment would generate 36 fewer HGV movements across the 12 hour period assessed between 07:00-19:00, of which eight would be in the AM peak period, resulting in a significant improvement of traffic flow on Edwin Road;



- The use of the site for industrial purposes in the future would lead to an increase in 265 trips across the 12 hour period assessed, compared with the site's existing use, of which 33 would be HGV movements; and
- If the site were redeveloped for residential and commercial purposes, there would be 69 fewer HGV movements across the day than if the site were used for industrial purposes in the future, which is equivalent to six fewer HGV movements per hour. This reduction in HGVs is more likely to be noticeable than a slight increase in car movements.

## 7 Suitability of Site for Continued Industrial Use

### INTRODUCTION

- 7.1 Based upon the analysis presented in this Transport Statement, this section evaluates whether the Greggs site in Twickenham is suitable for continued industrial use, taking into account the local highway network, the safety of vulnerable road users and the impact on the environment.

### SITE ACCESS AND LOCAL HIGHWAY NETWORK

- 7.2 The Greggs bakery site dates back to the Victorian era when factories were built with residential areas immediately surrounding it to cater for the workforce and goods were transported by barges on waterways such as the River Crane to the north of the site, and by horse-pulled carriages. While motor vehicles had been invented, they were rarely seen until the late 19<sup>th</sup> Century when they were still significantly less prevalent than today. As such, the site and the surrounding residential roads were not originally designed to cater for the volume of vehicle movements that occur today and particularly not for the size of HGVs that currently serve the site.
- 7.3 The total carriageway widths of the surrounding roads are not suitable for modern industrial roads according to the FTA design guidance which states that two-way access roads should have a minimum width of 7.3m, which is approximately 0.2m less than Edwin Road (7.2m wide). When considering the on-street parking along both sides of the carriageway on Edwin Road, the effective useable width of the road is only 3.3m which is less than half the minimum width for a road suitable for the site.
- 7.4 Furthermore, between Heath Road and the site, HGVs are required to manoeuvre around the tight junction of Colne Road and Marsh Farm Road and the corner of Marsh Farm Road and Edwin Road. Swept path analysis undertaken for an articulated HGV (16.5m) and a rigid HGV showed that the vehicles were unable to make the manoeuvre without going over the kerbline, which would result in the vehicles mounting the kerb and potentially conflicting with pedestrians. The narrow width of the two-way Marsh Farm Road also requires HGVs to occupy both sides of the road, increasing the potential for conflict with oncoming vehicles. It should also be noted that the proximity of the height restricted railway bridge to the junction of Colne Road / Marsh Farm Road means that it is unlikely that two HGVs would be able to pass each other, potentially causing queuing back to Heath Road, the main road.
- 7.5 The route described above is the route which vehicles are instructed to follow between the main road and the site as it is the most suitable for HGVs, but analysis has shown that it is not suitable at all for the size of vehicles accessing the site, which is typical of other industrial sites. It should be noted that alternative routes between the main road and the site are less suitable due to narrower carriageways and junctions with tighter radii.
- 7.6 The site access used by HGVs on Edwin Road is narrow and provides insufficient room for vehicles to turn into the site, which is further constrained by the presence of parked cars on both sides of the carriageway on the approach to the junction. As such, HGVs are required to reverse into the site access, which increases the risk of conflicting with other road users and pedestrians on the footway. Swept path analysis has shown that while reversing in, both the rigid and articulated vehicles went over the kerbline and would therefore mount the pavement, potentially conflicting with passing pedestrians. While egressing from the site, the articulated vehicle went over the kerbline and only just managed to straighten its path before conflicting with parked cars. This site access is unsuitable for HGV movements due to the constrained space on the approach to and at the access junction, and the opportunities for potential conflicts with other road users.

- 7.7 It should also be noted that the existing site has insufficient car parking capacity for employees and therefore there is an overspill onto the surrounding residential roads such as Edwin Road and Crane Road, which combined with residential demand for parking leads to a significant level of parking on-street. Therefore, if the site is redeveloped for mixed-use purposes where all parking is provided on-site, a reduction in the demand for on-street parking from the industrial uses would release some capacity. This would provide increased number of passing places for cars on the roads which are effectively one-way currently, improving the traffic flow along the residential streets.
- 7.8 As shown above, in terms of access and the local highway network, the site is not suitable for continued or future industrial use. It is heavily constrained by the narrow and residential nature of the roads and the tight radii at junctions and on bends, which are not suitable for frequent HGV movements. It is unlikely that potential occupants looking for facilities the size of the site would be interested due to the constraints presented by the highway network. Potential industrial occupants are likely to favour modern purpose built facilities which provide sufficient access on the highway network and where they are not subject to the constraints of the existing site.

## PEDESTRIAN AND CYCLIST SAFETY

- 7.9 The characteristics and nature of the pedestrian/cycle and vehicle movements in the predominantly residential area are not conducive to HGV movements. The site has been used for industrial purposes since the Victorian era when the transport network was significantly different and HGVs did not exist. The residential areas that have grown up around the factory were also established prior to the use of HGVs and the existing intense use of the site. Therefore, the local highway network was not designed to accommodate large vehicles such as HGVs and the quantity of on-street parking on the narrow Victorian streets. As such in the interests of safety noise and air quality, the number of HGVs using the roads should be minimised to reduce potential conflicts with other road users and vehicle emissions
- 7.10 Land use and road user composition have a significant impact upon the safety of all road users, especially pedestrians and cyclists. The IEMA's Guidelines for the Environmental Assessment of Road Traffic provides broad principles of how to assess the impact of a scheme upon users, including the impact on fear and intimidation, amenity and accidents and safety.
- 7.11 The fear and intimidation of pedestrians and cyclists is dependent on the volume of traffic, the proportion of the volume comprised of HGVs, and the proximity of pedestrians and cyclists to the flow of traffic. As the footways on Edwin Road and Colne Road are not shared cycle footways, cyclists are required to cycle on the carriageway with the two-way flow of traffic.
- 7.12 The London Cycle Design Standards (2014) state that the dynamic envelope of a moving cyclist is approximately 1.0m, which includes an average 0.75m static width plus an allowance for movement. The document states that the minimum safe clearance distance between the edge of a cyclist and the edge of a vehicle moving at 20mph is 1.0m, which increases to 1.5m for vehicles travelling at 30mph. Therefore for vehicles to overtake a cyclist, at least a further 2.0m is required in addition to the space that the vehicle takes up on the road. The useable width of carriageway on Edwin Road is 3.3m, which does not provide sufficient width for cyclists to be overtaken safely by a car or HGV. As such, vehicles may execute unsafe overtaking procedures or follow cyclists around the road network, increasing the fear and intimidation that they experience. The redevelopment of the site as a mixed-use scheme rather than industrial-related employment would reduce the number of HGV trips, at the Greggs site and along Edwin Road and Colne Road, reducing the magnitude of fear and intimidation experienced by both pedestrians and cyclists.
- 7.13 Pedestrian and cyclist amenity relates to the pleasantness of a journey, and is affected by traffic flow and composition, and separation of the users from the traffic. Similarly to fear and intimidation, the redevelopment of the site as mixed-use would provide a more pleasant environment for pedestrians and cyclists, with fewer HGVs impacting upon their journey.

- 7.14 Due to the limited visibility of pedestrians, and especially cyclists, to HGV drivers, an increase in trips by these vehicles is likely to have a detrimental effect on the safety of vulnerable road users. This is a particular concern on Edwin Road which has significant levels of on-street parking and therefore would further reduce the visibility of any pedestrians or cyclists wishing to cross the road.

## OTHER ENVIRONMENTAL ISSUES

- 7.15 In addition to the impact upon pedestrian and cyclist safety, the retention of the site for industrial land uses would have a detrimental effect on the noise and air quality of the surrounding area, including the residential roads that are used to access the strategic road network, including the A305 and A316.
- 7.16 Furthermore, by removing industrial use from the Greggs site, HGV numbers will be reduced. This meets Richmond's aspirations to reduce the NO<sub>2</sub> emissions in the Richmond Air Quality Management Area (AQMA).
- 7.17 The removal of the industrial designation of the site would have an impact not just on the physical environment, but also on the amenity of the area. The reduction in noise and deliveries by HGV to the site, particularly at antisocial hours, would have a positive impact on the pleasantness and amenity of the area for surrounding residents. The proximity of the houses to the road, due to the narrow design of the Victorian streets, means that the noise and vibration generated by large vehicles such as HGVs is more intense than in less dense residential areas and the reduction of HGVs would be positive.

## SUMMARY

- 7.18 Based upon the findings in this TS, the Greggs site in Twickenham is considered to be unsuitable for continued and future industrial use for a number of reasons:
- The site and the local highway network was designed in the Victorian era when motor vehicles were not as prevalent and industrial sites were not served by HGVs;
  - The site has outgrown its location in terms of the number of trips it generates and the suitability of the highway network for its current uses;
  - The local highway network is spatially constrained along straight sections, at corners and at junctions due to the narrow design and a reduced useable width due to on-street parking, and is not suitable for frequent HGV movements;
  - The redevelopment of the site for mixed-use purposes would relieve capacity on the local highway network and reduce the level of fear and intimidation experienced by residents, pedestrians and cyclists as a result of frequent HGV movements; and
  - A reduction in the quantity of HGVs accessing the site as a result of mixed-use redevelopment would have a positive impact on air quality and noise and would meet Richmond's aspirations to reduce NO<sub>2</sub> emissions in the AQMA.

## 8 Summary and Conclusion

- 8.1 JMP Consultants Ltd have been commissioned by Colliers International to provide transport consultancy services for a site located off Gould Road and Edwin Road in the London Borough of Richmond (LBR), with potential for a residential-led mixed-use planning application. The site currently comprises production facilities for Greggs Bakery but is surplus to requirements and therefore is due to be closed. Due to its location embedded in an existing residential area and the constrained nature of the local highway network, the site is not appropriate for an allocation for industrial use or for solely office use, either at the current time or in the future.
- 8.2 The redevelopment proposals are for the 96 residential units and the provision of 2,757m<sup>2</sup> of commercial start-up space. Car and cycle parking would be provided in line with the London Plan requirements. The vehicular and pedestrian access on Gould Road would be retained, and the principle of access on Edwin Road would be retained but relocated slightly to the east and designed to include access for pedestrians and cyclists.
- 8.3 The proposed redevelopment would generate approximately 87 trips by light vehicles across both peak periods which, as an average, is equal to less than one vehicle trip each minute across both accesses. While this is an increase in light vehicles compared to the existing use, the change of just over one additional vehicle every two minutes is imperceptible to other road users and local residents. However, the redevelopment of the site would generate 36 fewer HGV movements across the 12 hour period assessed, which due to the vehicles noise and disruption would be a significant improvement for residents.
- 8.4 With regards to policy, the redevelopment of the site as a mixed-use scheme would support the NPPF and FALP's requirement for developments that generate significant movement, such as those with mixed-uses, to be located where the use of sustainable transport modes can be maximised. The location of the site within a 15 minute walk of Twickenham train station, a key public transport interchange in the area, would better support the significant proportion of trips made by sustainable modes in mixed-use developments, than the more car/HGV dependent trips associated with industrial land uses. FALP also states that developments should not adversely affect safety on the transport network which, should the site be developed for industrial-related employment purposes, is likely to occur due to the unsuitable nature of the local highway network and site access arrangements for HGV movements and the increased number of HGV movements expected for potential future industrial use.
- 8.5 Following a review of the site's location in the context of the local highway network and the site access arrangements, it is considered that redeveloping the site for industrial purposes would present substandard access for HGVs, which could result in a highway objection on reasons of highway safety. This is a result of both the local highway infrastructure in its current form being unable to sufficiently accommodate significant HGV movements due to considerable on-street parking, and the access arrangements for the site itself from Edwin Road being unsuitable for HGVs.
- 8.6 Ease of access to sites for HGVs and adequate capacity on the surrounding local highway network are key factors required for industrial land uses to operate efficiently. The constrained access arrangements of the site for HGVs and light vehicles due to the narrow nature of the two-way road and the tight junction radii, and the restrictions imposed by significant on-street parking along these roads, are likely to affect the demand of potential occupiers considering the site.
- 8.7 Furthermore, its requirement for vehicles to route along a network of residential and narrow two-way local streets to access the wider strategic road network make it unsuitable to be used as a modern industrial site, due to the safety and environmental implications for other road users and local residents. Accessing the site from the wider area requires vehicles to route along roads through residential areas with housing fronting onto both sides of the carriageway. These routes are unsuitable for high volumes

of HGVs due to the detrimental impacts on residents in terms of noise, air quality, safety and overall amenity

- 8.8 The redevelopment of the site for mixed-use purposes would reduce the volume of traffic, including HGVs, improving the fear and intimidation, safety and amenity for all road users, particularly pedestrians and cyclists. It would also lead to an improvement in air and noise quality for people in the vicinity of the site, and who live along routes to the strategic road network and motorways. A reduction in HGVs would result in a reduction in NO<sub>2</sub> emissions, helping Richmond to achieve its AQMA aspirations.
- 8.9 Therefore, on transport and highway terms it is considered that the redevelopment of the site as a mixed-use scheme rather than industrial would be beneficial for the local community, local road users and the environment. The proposed redevelopment has been shown to have an imperceptible impact on the local highway network in terms of increase in light vehicle trips and will benefit local residents and other road users by reducing the number of HGV trips.



# Appendix A

## DEVELOPMENT MASTERPLAN



A1

1:250 @ A1

0

10 M

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Site Boundary

Unit Schedule	
1 Bed	9 Units
2 Bed	54 Units
3 Bed	15 Units
4 Bed	18 Units
Commercial	2757 sq m
No. of units	96 Units
Density	401 HR/Ha

ACGARCHITECTS.CO.UK  
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Hampshire, RG21 7NU  
+44 (0)1256 411 450  
mail@acgarchitects.co.uk

AYRE  
CHAMBERLAIN  
GAUNT

REV  
A

DATE  
25/2/16

NOTES  
Issue for pre-planning application

DRAWN BY  
RA

CHECKED BY  
GW

JOB NO.  
216

STATUS  
PLN

PROJECT  
Gould Road  
Twickenham

DRAWING TITLE  
Proposed  
Site Plan

DRAWING NO.  
216\_PLN\_100

REV  
A

## Appendix B

### PERSONAL INJURY ACCIDENT DATA



## Colne Road GIS Area Collisions - 5 years to 30-Nov -2015 (provisional)

### Summary of Accidents Selected

Site Reference and Description (zero accident counts shown in bold)	Date Period	Accidents
MD01 GIS AREA B24_Colne_Rd (P)	60 MTS TO NOV-2015	10

*The description of how the accident occurred and the contributory factors are the reporting officer's opinion at the time of reporting and may not be the result of extensive investigation*



## Colne Road GIS Area Collisions - 5 years to 30-Nov -2015 (provisional)

MD01 GIS AREA B24_Colne_Rd (P)										60 MTS TO NOV-2015 SORTED BY DATE	
1	0112TW60058	SAT 28/01/12 13:30	LIGHT	HEATH ROAD J/WLONMDON ROAD				24	LINK 104-131	515610 / 173120	
POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN STOP SIGN NO XING FACILITY IN 50M											
PED CROSSED ROAD BETWEEN MOVING TRAFFIC AND WAS HIT BY V1											
CASUALTY 001 (001) (? Yrs - M UNKN)			SLIGHT	PEDESTRIAN		UNKNOWN					
VEHICLE	001 (000)	CAR	(56 Yrs - M TW4 )		GOING AHEAD RIGHT BEND SW TO E			JCT MID			
BT - DRV NOT CONTACTED					FRONT HIT FIRST						
C001	A	801 (CROSSED ROAD MASKED BY STATIONARY OR PARKED VEHICLE)				C001	A	803 (FAILED TO JUDGE VEHICLE'S PATH OR SPEED)			
C001	A	808 (CARELESS/RECKLESS/IN A HURRY)				V001	A	405 (FAILED TO LOOK PROPERLY)			
2	0112TW60173	THU 17/05/12 09:40	LIGHT	HEATH ROAD/THE GREEN J/W COLNE ROAD				24	LINK 104-131	515580 / 173110	
POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M											
V1 TURNED LEFT ACROSS PATH V2 (CYCLIST) CAUSING A COLLISION & RIDER TO FALL OFF											
CASUALTY 001 (002) (36 Yrs - F TW12)			SLIGHT	DRIVER/RIDER							
VEHICLE	001 (002)	GDS 3.5-7.5T	(42 Yrs - M TW7 )		TURNING LEFT			SW TO NW		JCT MID	
BT - NOT REQUESTED					N/S HIT FIRST						
VEHICLE	002 (001)	PEDAL CYCLE	(36 Yrs - F TW12)		GOING AHEAD OTHER			SW TO NE		JCT MID	
BT - NOT APPLICABLE					FRONT HIT FIRST						
V001	A	403 (POOR TURN OR MANOEUVRE)				V001	A	404 (FAILED TO SIGNAL/ MISLEADING SIGNAL)			
V001	A	405 (FAILED TO LOOK PROPERLY)				V001	A	407 (PASSING TOO CLOSE TO CYCLIST, HORSE RIDER OR PEDESTRIAN)			
3	0112TW60241	SUN 08/07/12 20:11	DARK	COLNE ROAD J/W ALBION ROAD				24	CELL 515000/173000	515410 / 173140	
POLICE - AT SCENE ROAD-WET WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M											
DRV V1 HAS POOR EYESIGHT & DRV V2 WAS TRAVELLING TOO FAST FOR CONDITIONS & BOTH FAILED TO GIVEWAY & COLLIDED											
CASUALTY 001 (002) (27 Yrs - M TW3 )			SLIGHT	DRIVER/RIDER							
VEHICLE	001 (002)	CAR	(82 Yrs - M TW2 )		GOING AHEAD OTHER			W TO E		JCT MID	
BT - NEGATIVE					FRONT HIT FIRST						
VEHICLE	002 (001)	M/C 50-125CC	(27 Yrs - M TW3 )		GOING AHEAD OTHER			E TO W		JCT MID	
BT - NEGATIVE					FRONT HIT FIRST						
V001	A	504 (UNCORRECTED, DEFECTIVE EYESIGHT)				V001	A	302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS)			
V002	A	307 (TRAVELLING TOO FAST FOR CONDITIONS)				V002	A	302 (DISOBEYED GIVE WAY OR STOP SIGN OR MARKINGS)			



## Colne Road GIS Area Collisions - 5 years to 30-Nov -2015 (provisional)

MD01 GIS AREA B24_Colne_Rd (P)										60 MTS TO NOV-2015 SORTED BY DATE	
<b>4</b>	0112TW60323	FRI 14/09/12 09:08	LIGHT	THE GREEN J/W LION ROAD				24	LINK 104-131	515580 / 173110	
POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M											
V1 TURNED AND V2 (CYCLIST) WASNT PAYING ATTENTION AND HIT THE SIDE OF V1											
CASUALTY 001 (002) (30 Yrs - M TW12) SLIGHT DRIVER/RIDER											
VEHICLE	001 (002)	CAR	(42 Yrs - F TW4 )	TURNING LEFT	SW TO NW					JCT MID	
BT - NOT REQUESTED											
VEHICLE	002 (001)	PEDAL CYCLE	(30 Yrs - M TW12)	GOING AHEAD OTHER	SW TO NE					JCT MID	
BT - NOT APPLICABLE											
V002 A 405 (FAILED TO LOOK PROPERLY)						V002 A 602 (CARELESS/RECKLESS/IN A HURRY)					
<b>5</b>	0113TW60114	MON 22/04/13 08:13	LIGHT	THE GREEN J/W COLNE ROAD				24	LINK 104-131	515580 / 173110	
POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M											
V2 MAIN ROAD WEST-BD BEGAN TO TURN RIGHT, AS V1 BEGAN AN OVERTAKE											
CASUALTY 001 (001) (18 Yrs - M W3 ) SLIGHT DRIVER/RIDER											
VEHICLE	001 (002)	M/C 50-125CC	(18 Yrs - M W3 )	OVERTAKE MOVE VEH O/S	NE TO SW					JCT MID	
BT - NOT REQUESTED											
VEHICLE	002 (001)	CAR	(32 Yrs - F TW2 )	TURNING RIGHT	NE TO NW					JCT MID	
BT - NOT REQUESTED											
V001 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)						V002 A 405 (FAILED TO LOOK PROPERLY)					





## Colne Road GIS Area Collisions - 5 years to 30-Nov -2015 (provisional)

MD01 GIS AREA B24_Colne_Rd (P)										60 MTS TO NOV-2015 SORTED BY DATE	
6	0113TW60306	WED 04/09/13 13:32	LIGHT	HEATH ROAD J/W HEATH GARDENS				24	LINK 104-131	515620 / 173120	
POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M											
V2 TURNED RIGHT ACROSS PATH OF ONCOMING V1											
CASUALTY 001 (002) (32 Yrs - F SW14)			SLIGHT	DRIVER/RIDER							
VEHICLE	001 (002)	CAR	(68 Yrs - F TW16)		TURNING RIGHT	W TO S		LEAVING MAIN RD			
		BT - NOT REQUESTED				N/S HIT FIRST					
VEHICLE	002 (001)	PEDAL CYCLE	(32 Yrs - F SW14)		GOING AHEAD OTHER	E TO W		JCT APP			
		BT - NOT APPLICABLE				FRONT HIT FIRST					
V001 A	405 (FAILED TO LOOK PROPERLY)				V001 B	406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)					
V001 B	701 (VISION AFFECTED - STATIONARY OR PARKED VEHICLE(S))				V002 B	701 (VISION AFFECTED - STATIONARY OR PARKED VEHICLE(S))					
V002 A	405 (FAILED TO LOOK PROPERLY)										
7	0114TW60121	FRI 21/03/14 08:38	LIGHT	HEATH ROAD J/W HEATH GARDENS				24	LINK 104-131	515630 / 173110	
POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M											
E/B V1 TURNED RIGHT AS UNIDENT VEH ALSO TURNED RIGHT; V1 COLLIDED WITH PED CAS1 AND PED CAS2											
CASUALTY 001 (001) (9 Yrs - M TW1 )			SLIGHT	PEDESTRIAN		CROSSING ROAD (NOT ON XING)		W BOUND	FROM DRIVERS N/SIDE		
			JOURNEY TO/FROM SCHOOL			Sch Attended : N/K					
CASUALTY 002 (001) (7 Yrs - M TW1 )			SLIGHT	PEDESTRIAN		CROSSING ROAD (NOT ON XING)		W BOUND	FROM DRIVERS N/SIDE		
			JOURNEY TO/FROM SCHOOL			Sch Attended : N/K					
VEHICLE	001 (000)	CAR	(34 Yrs - F TW2 )		TURNING RIGHT	W TO SE		JCT MID			
		BT - NEGATIVE				FRONT HIT FIRST					
C001 B	802 (FAILED TO LOOK PROPERLY)				C002 B	802 (FAILED TO LOOK PROPERLY)					
C001 B	803 (FAILED TO JUDGE VEHICLE'S PATH OR SPEED)				C002 B	803 (FAILED TO JUDGE VEHICLE'S PATH OR SPEED)					



## Colne Road GIS Area Collisions - 5 years to 30-Nov -2015 (provisional)

MD01 GIS AREA B24_Colne_Rd (P)										60 MTS TO NOV-2015 SORTED BY DATE	
8	0114TW60239		THU 29/05/14 13:49		LIGHT NFL: THE GREEN 26M W J/W HEATH GARDENS				24	LINK 104-131	515600 / 173110
POLICE - AT SCENE			ROAD-DRY		WEATHER-FINE		SINGLE CWY NO JUN IN 20M		NO XING FACILITY IN 50M		
W/B V1 PASSED PARKED V2 AND WAS STRUCK BY V2 CAB DOOR SWINGING OPEN INTO HER FACE											
CASUALTY			001 (001) (43 Yrs - F TW10)		SERIOUS		DRIVER/RIDER				
VEHICLE	001	(002)	PEDAL CYCLE (43 Yrs - F TW10)		OVERTAKE STAT VEH O/S		E TO W	COMM TO/FROM WORK			
			BT - NOT APPLICABLE				FRONT HIT FIRST				
					HIT PARKED VEH						
VEHICLE	002	(001)	GDS => 7.5T (36 Yrs - M SL1 )		PARKED		P TO P	JNY PART OF WORK			
			BT - NEGATIVE				O/S HIT FIRST				
V002 B 405 (FAILED TO LOOK PROPERLY)											
V002 A 904 (VEHICLE DOOR OPENED OR CLOSED NEGLIGENTLY)											
V001 B 403 (POOR TURN OR MANOEUVRE)											
9	0114TW60434		SAT 04/10/14 12:19		LIGHT HEATH ROAD J/W LION ROAD				24	LINK 104-131	515610 / 173120
POLICE - AT SCENE			ROAD-WET		RAINING		SINGLE CWY T/STAG JUN		GIVE WAY/UNCONT NO XING FACILITY IN 50M		
E/B V1 CYCLED ON N/S OF VEHICLES, APPROACHED GAP ; W/B V2 TURNED RIGHT INTO GAP, COLLIDED V1											
CASUALTY			001 (001) (43 Yrs - M SW15)		SLIGHT		DRIVER/RIDER				
VEHICLE	001	(002)	PEDAL CYCLE (43 Yrs - M SW15)		OVERTAKING NEARSIDE		W TO E	JCT MID			
			BT - NOT APPLICABLE				FRONT HIT FIRST				
VEHICLE	002	(001)	CAR (? Yrs - F 1 )		TURNING RIGHT		E TO N	JCT MID			
			BT - DRV NOT CONTACTED				N/S HIT FIRST				
V001 A 405 (FAILED TO LOOK PROPERLY)											
V002 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)											
V002 A 403 (POOR TURN OR MANOEUVRE)											

**Colne Road GIS Area Collisions - 5 years to 30-Nov -2015 (provisional)**

MD01 GIS AREA B24_Colne_Rd (P)	60 MTS TO NOV-2015 SORTED BY DATE
--------------------------------	-----------------------------------

10 0115TW60256 FRI 31/07/15 21:40 DARK HEATH ROAD J/W LION ROAD	24 LINK 104-131	515610 / 173120
---	-----------------	-----------------

POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN	GIVE WAY/UNCONT NO XING FACILITY IN 50M
---	---

W/B V2 TURNED RIGHT; E/B V1 BRAKED TO AVOID BUT COLLIDED
--

CASUALTY 001 (001) (19 Yrs - M TW2 ) SLIGHT DRIVER/RIDER
--

VEHICLE 001 (002) CAR (19 Yrs - M TW2 )	TURNING RIGHT	E TO N	JCT MID
BT - NOT REQUESTED		N/S HIT FIRST	

VEHICLE 002 (001) M/C <= 50CC (57 Yrs - M TW13)	GOING AHEAD OTHER	W TO E PUPIL RIDING TO/FROM SCH	JCT MID
BT - NEGATIVE		FRONT HIT FIRST	

V002 A 403 (POOR TURN OR MANOEUVRE)
-------------------------------------

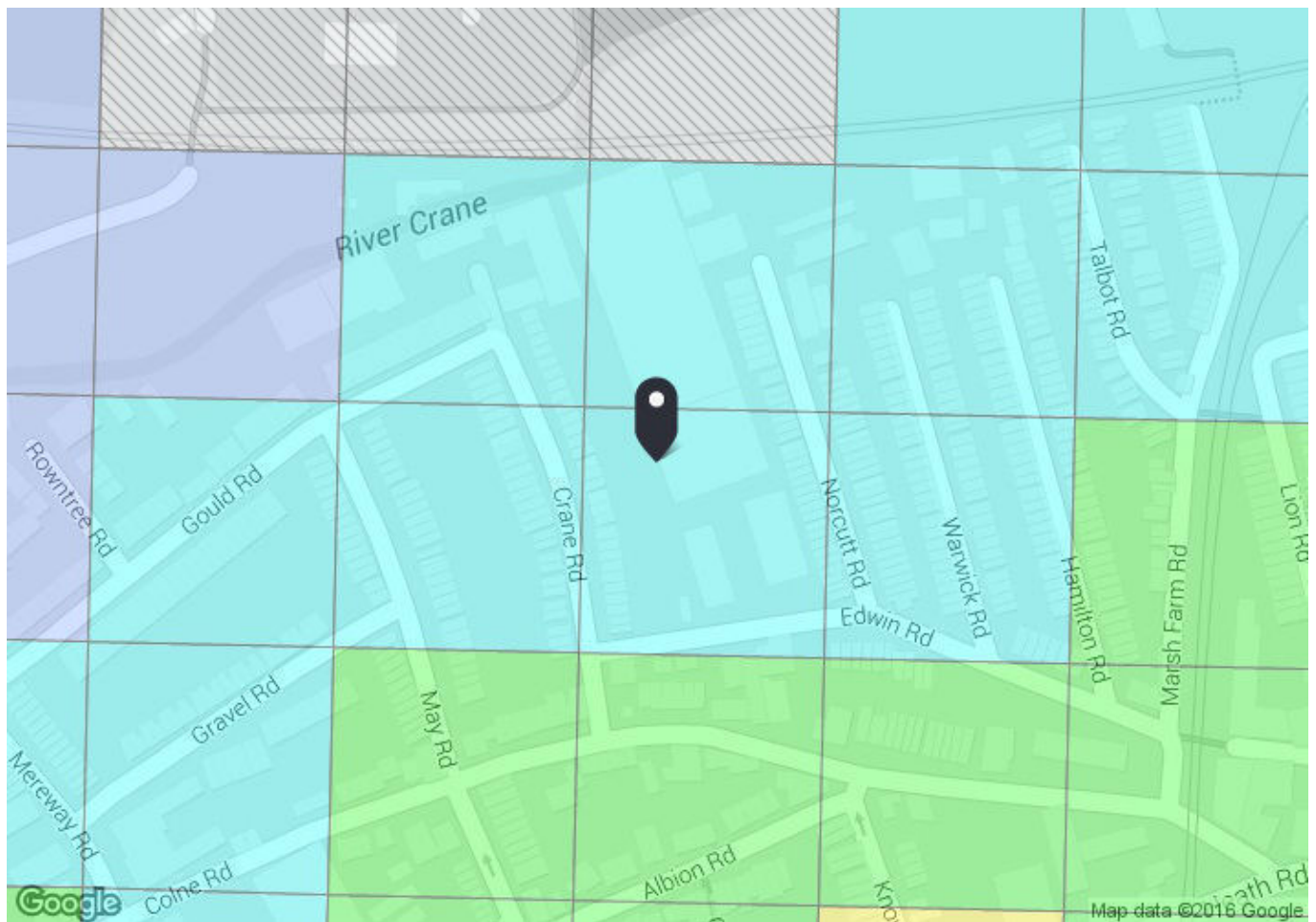
V002 A 405 (FAILED TO LOOK PROPERLY)
--------------------------------------

End of Accidents for MD01 GIS AREA B24_Colne_Rd (P)
---

End of Report

# Appendix C

## PTAL REPORT



PTAL output for 2011 (Base year)

2

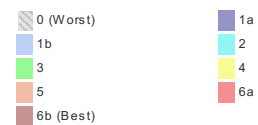
30 Crane Rd, Twickenham, Greater London TW2 6RY, UK

Easting: 515327, Northing: 173272

Grid Cell: 45397

Report generated: 19/04/2016

#### Map key - PTAL



#### Map layers

PTAL (cell size: 100m)

#### Calculation Parameters

Day of Week	M-F
Time Period	AM Peak
Walk Speed	4.8 kph
Bus Node Max. Walk Access Time (mins)	8
Bus Reliability Factor	2.0
LU Station Max. Walk Access Time (mins)	12
LU Reliability Factor	0.75
National Rail Station Max. Walk Access Time (mins)	12
National Rail Reliability Factor	0.75

Calculation data

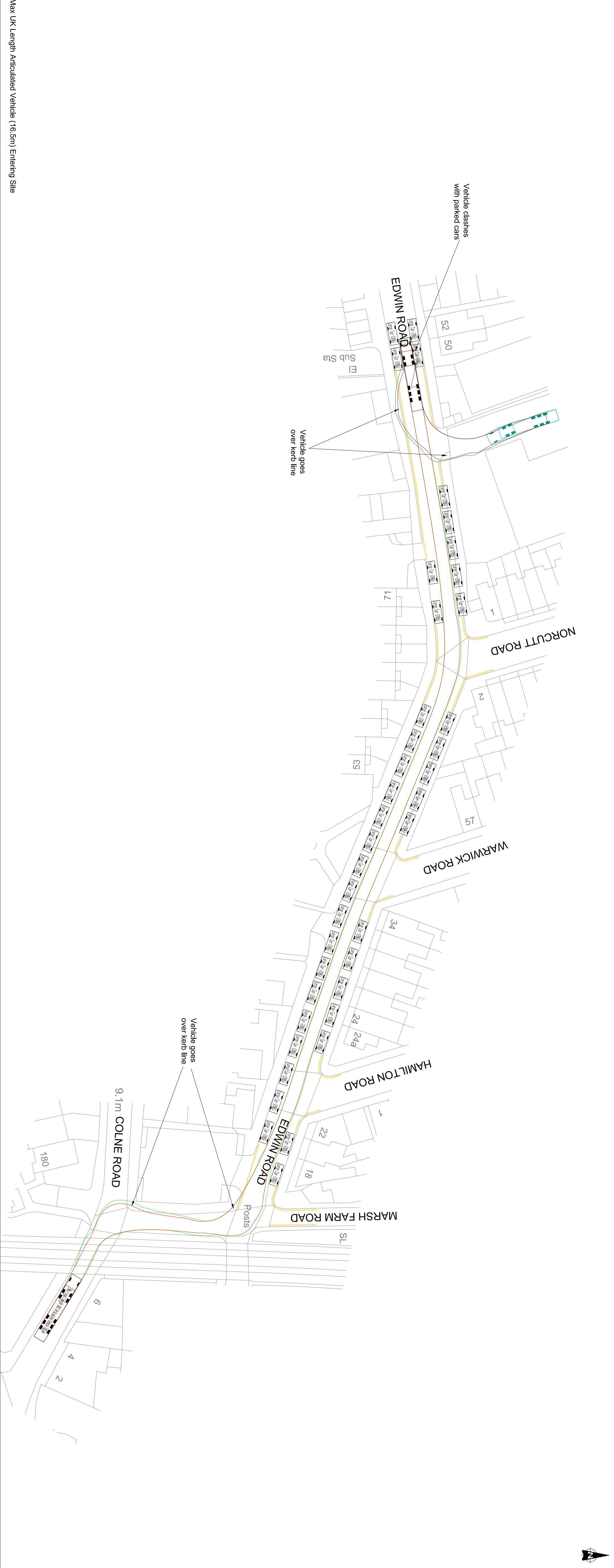
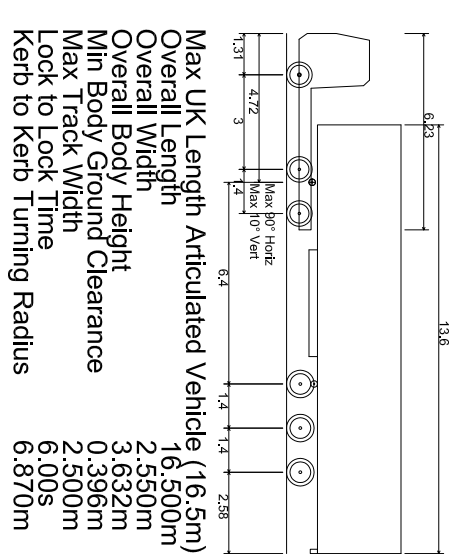
Mode	Stop	Route	Distance (metres)	Frequency(vph)	Walk Time (mins)	SWT (mins)	TAT (mins)	EDF	Weight	AI
Bus	TWICKENHAM GREEN	290	452.01	3	5.65	12	17.65	1.7	0.5	0.85
Bus	TWICKENHAM GREEN	281	452.01	7.5	5.65	6	11.65	2.58	1	2.58
Bus	TWICKENHAM GREEN	R70	452.01	6	5.65	7	12.65	2.37	0.5	1.19
Bus	TWICKENHAM GREEN	267	452.01	6	5.65	7	12.65	2.37	0.5	1.19
Bus	TWICKENHAM GREEN	110	404.43	3	5.06	12	17.06	1.76	0.5	0.88
Bus	TWICKENHAM GREEN	490	404.43	5	5.06	8	13.06	2.3	0.5	1.15
Bus	TWICKENHAM GREEN	H22	404.43	5	5.06	8	13.06	2.3	0.5	1.15
Total Grid Cell AI:										8.97



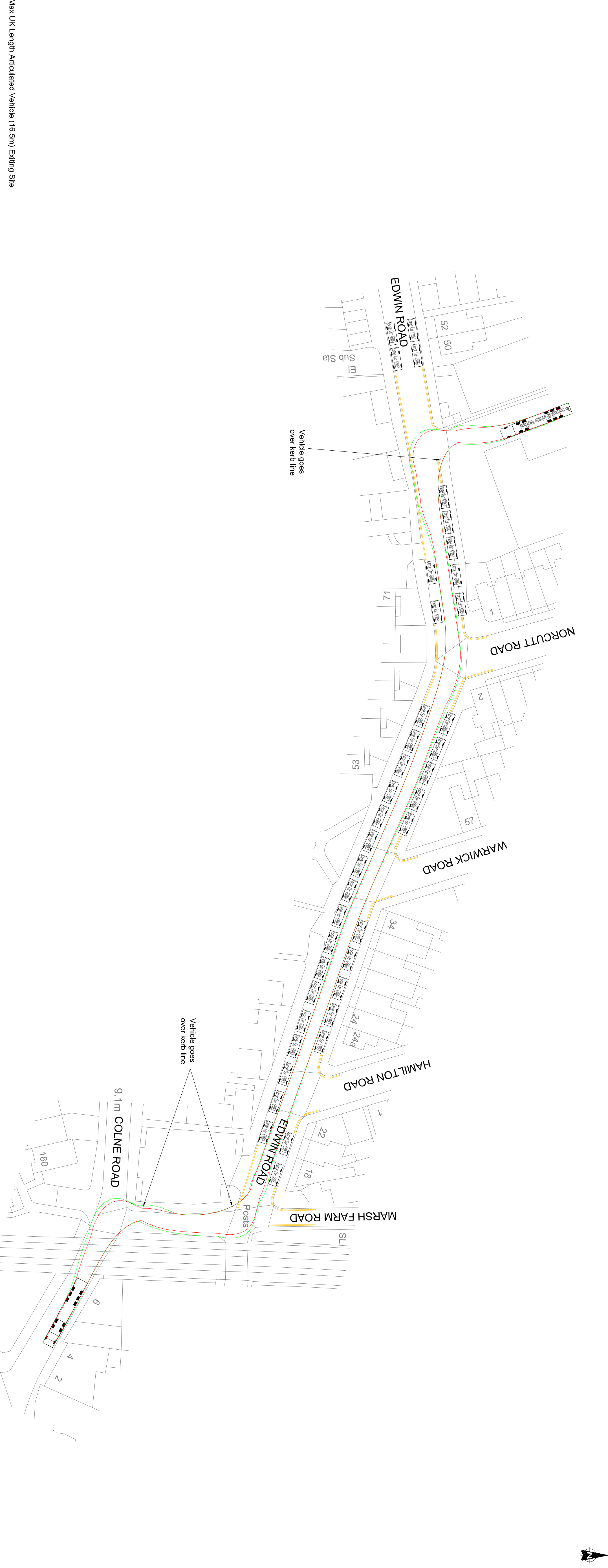
# Appendix D

## SWEPT PATH ANALYSIS

Notes



Max UK Length Articulated Vehicle (16.5m) Entering Site

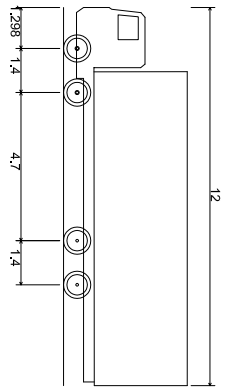


Max UK Length Articulated Vehicle (16.5m) Exiting Site

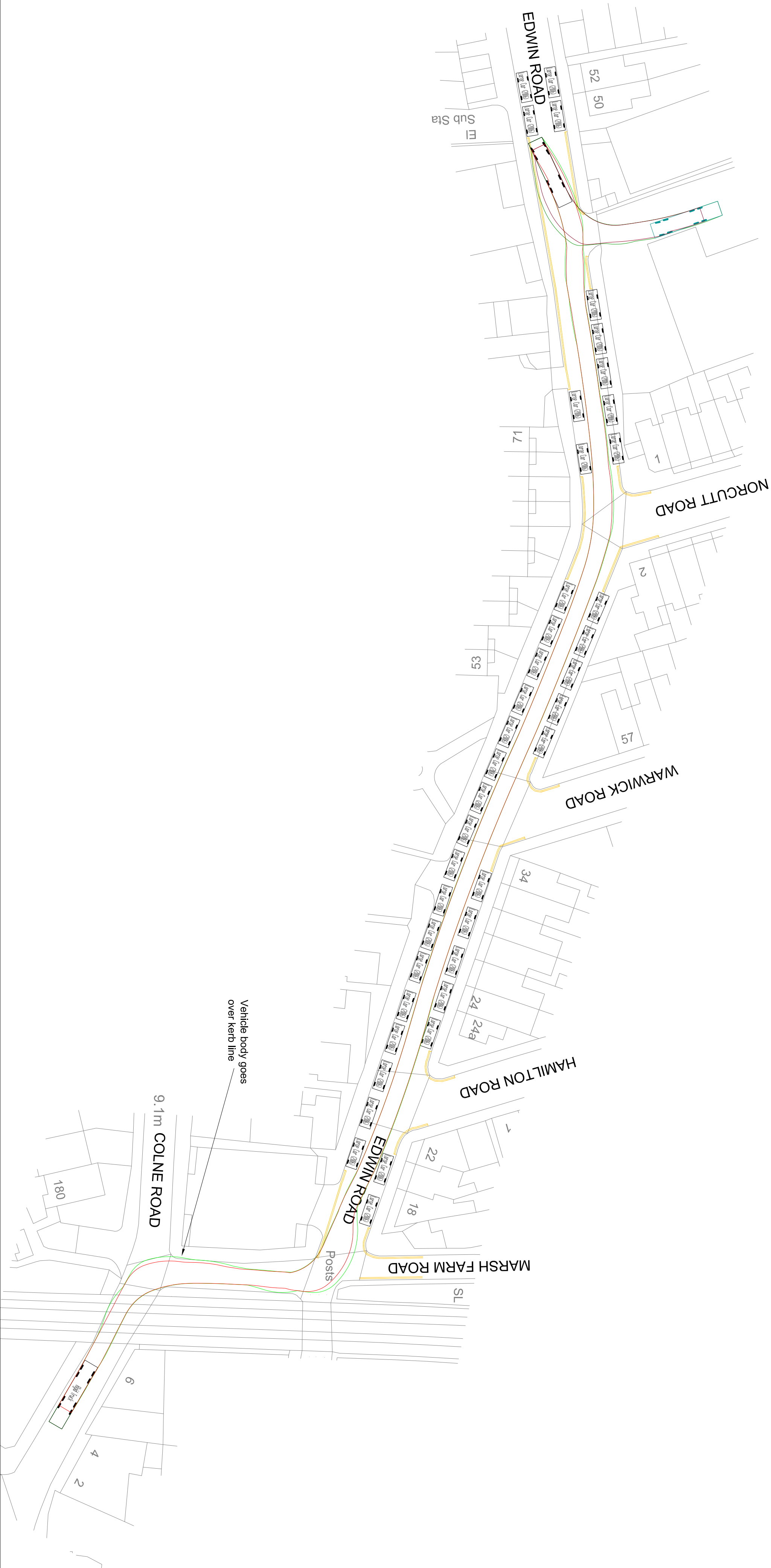
Gould Road, Twickenham			
Swerft Path Analysis at Edwin Road Sheet 1 of 2			
Drawn	Checked	Approved	RS
RM	JC	RS	
Scale	1:500	Scale	1:500
Drawn Date	15/04/2016	Drawn Number	ST17096-01
Information			
Greggs plc			
JMP			
27-32 Old Jewry London EC2N 6BQ T 020 3714 4400 E london@jmp.co.uk W www.jmp.co.uk			
© This drawing is the property of JMP Consultants Limited and the information can only be reproduced with their prior permission.			
Rev	Date	Revision details	Drawn
Drawn: Checked/Approved:			



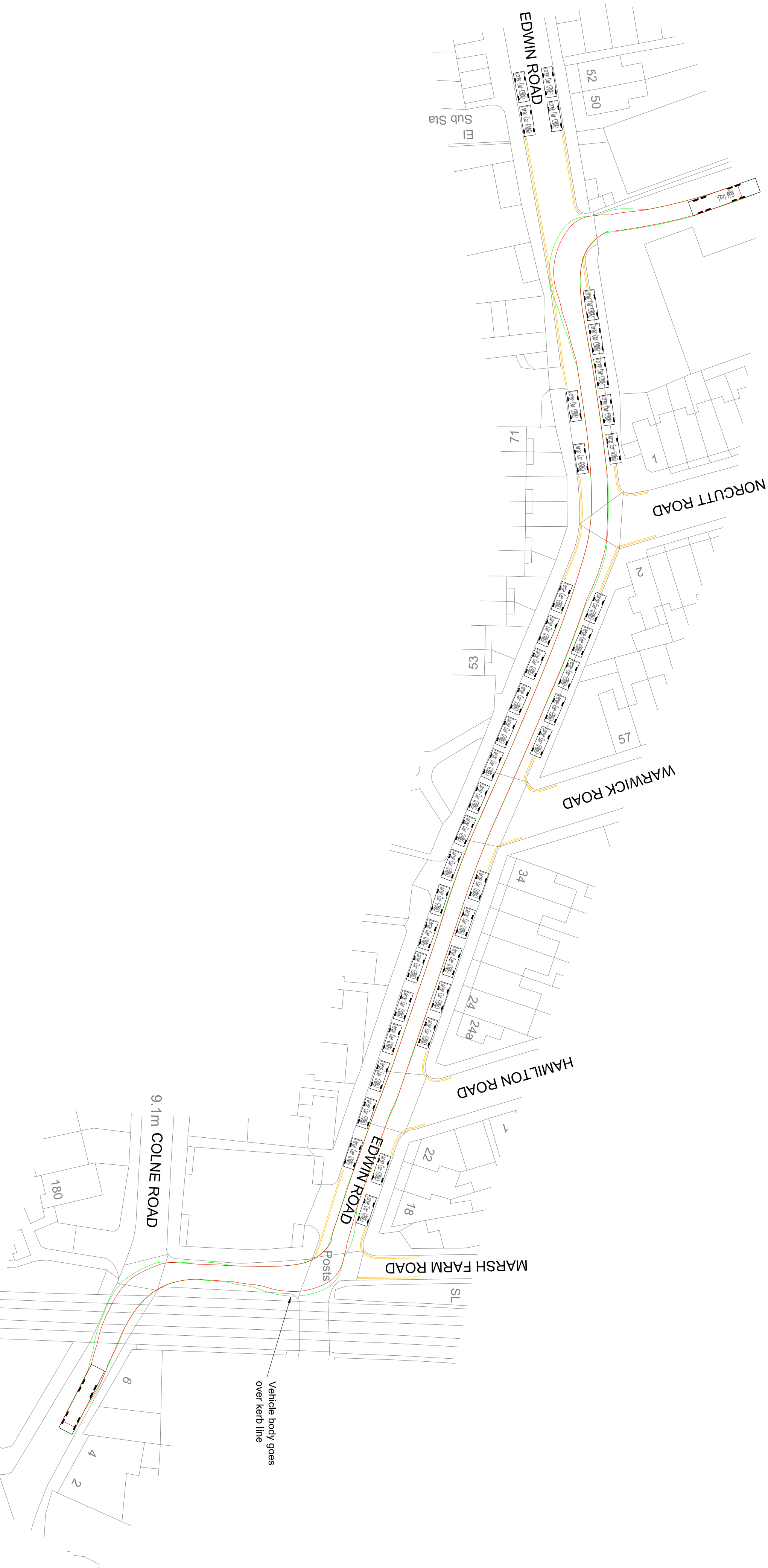
Notes



Rigid Truck  
Overall Length 12.000m  
Overall Width 2.500m  
Overall Body Height 3.928m  
Min Body Ground Clearance 0.412m  
Min Body Height 2.447m  
Lock to Lock Time 6.00s  
Kerb to Kerb Turning Radius 11.900m



Rigid Truck Entering Site



Rigid Truck Exiting Site

Rev	Date	Revision details	Drawn	Checked/Approved
1	15/04/2016	Initial design	JM	RS
2	15/04/2016	Revised design	JM	RS
3	15/04/2016	Final design	JM	RS

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Drawn  
RM

Checked  
JC

Date  
15/04/2016

Scale  
1:500

Drawing Number  
ST17096-02

Rev  
-

# Appendix E

## TRICS OUTPUTS

Calculation Reference: AUDIT-846402-160405-0415

## TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT  
Category : C - INDUSTRIAL UNIT

### MULTI-MODAL VEHICLES

#### Selected regions and areas:

01 GREATER LONDON

BT BRENT

1 days

*This section displays the number of survey days per TRICS® sub-region in the selected set*

## Filtering Stage 2 selection:

*This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.*

Parameter: Gross floor area  
Actual Range: 6100 to 6100 (units: sqm)  
Range Selected by User: 620 to 6100 (units: sqm)

#### Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/08 to 10/09/14

*This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.*

#### Selected survey days:

Wednesday 1 days

*This data displays the number of selected surveys by day of the week.*

#### Selected survey types:

Manual count 1 days  
Directional ATC Count 0 days

*This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.*

#### Selected Locations:

Suburban Area (PPS6 Out of Centre) 1

*This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.*

#### Selected Location Sub Categories:

Industrial Zone 1

*This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.*

## Filtering Stage 3 selection:

#### Use Class:

B2 1 days

*This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.*

**Filtering Stage 3 selection (Cont.):**Population within 1 mile:

50,001 to 100,000

1 days

*This data displays the number of selected surveys within stated 1-mile radii of population.*

Population within 5 miles:

500,001 or More

1 days

*This data displays the number of selected surveys within stated 5-mile radii of population.*

Car ownership within 5 miles:

0.6 to 1.0

1 days

*This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.*

Travel Plan:

No

1 days

*This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.*



LIST OF SITES relevant to selection parameters

<b>1</b>	<b>BT-02-C-02</b>	<b>FOOD PRODUCTION</b>	<b>BRENT</b>
	ABBEYDALE ROAD		
	ALPERTON		
	Suburban Area (PPS6 Out of Centre)		
	Industrial Zone		
	Total Gross floor area:	6100 sqm	
	Survey date: WEDNESDAY	10/09/14	Survey Type: MANUAL

*This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL VEHICLES**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.082	1	6100	0.000	1	6100	0.082
06:30 - 07:00	<b>1</b>	<b>6100</b>	<b>0.361</b>	1	6100	0.164	<b>1</b>	<b>6100</b>	<b>0.525</b>
07:00 - 07:30	1	6100	0.115	1	6100	0.098	1	6100	0.213
07:30 - 08:00	1	6100	0.082	1	6100	0.049	1	6100	0.131
08:00 - 08:30	1	6100	0.033	1	6100	0.049	1	6100	0.082
08:30 - 09:00	1	6100	0.082	1	6100	0.049	1	6100	0.131
09:00 - 09:30	1	6100	0.066	1	6100	0.066	1	6100	0.132
09:30 - 10:00	1	6100	0.066	1	6100	0.016	1	6100	0.082
10:00 - 10:30	1	6100	0.098	1	6100	0.115	1	6100	0.213
10:30 - 11:00	1	6100	0.066	1	6100	0.098	1	6100	0.164
11:00 - 11:30	1	6100	0.082	1	6100	0.033	1	6100	0.115
11:30 - 12:00	1	6100	0.033	1	6100	0.082	1	6100	0.115
12:00 - 12:30	1	6100	0.033	1	6100	0.016	1	6100	0.049
12:30 - 13:00	1	6100	0.000	1	6100	0.049	1	6100	0.049
13:00 - 13:30	1	6100	0.033	1	6100	0.049	1	6100	0.082
13:30 - 14:00	1	6100	0.082	1	6100	0.049	1	6100	0.131
14:00 - 14:30	1	6100	0.016	1	6100	0.066	1	6100	0.082
14:30 - 15:00	1	6100	0.082	1	6100	0.066	1	6100	0.148
15:00 - 15:30	1	6100	0.066	1	6100	0.049	1	6100	0.115
15:30 - 16:00	1	6100	0.049	1	6100	0.016	1	6100	0.065
16:00 - 16:30	1	6100	0.098	1	6100	0.066	1	6100	0.164
16:30 - 17:00	1	6100	0.197	1	6100	0.049	1	6100	0.246
17:00 - 17:30	1	6100	0.131	<b>1</b>	<b>6100</b>	<b>0.328</b>	1	6100	0.459
17:30 - 18:00	1	6100	0.016	1	6100	0.066	1	6100	0.082
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			1.969			1.688			3.657

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL TAXIS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
06:30 - 07:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:00 - 07:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:30 - 08:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:30 - 11:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:00 - 11:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:30 - 12:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:00 - 12:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:30 - 13:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:00 - 13:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:30 - 14:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:00 - 14:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:30 - 16:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:00 - 16:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:30 - 17:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:00 - 17:30	1	<b>6100</b>	<b>0.016</b>	1	<b>6100</b>	<b>0.016</b>	1	<b>6100</b>	<b>0.032</b>
17:30 - 18:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.016			0.016			0.032

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL OGVS**

**Calculation factor: 100 sqm**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.016	1	6100	0.000	1	6100	0.016
06:30 - 07:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:00 - 07:30	1	6100	0.016	1	6100	0.016	1	6100	0.032
07:30 - 08:00	1	6100	0.033	1	6100	0.016	1	6100	0.049
08:00 - 08:30	1	6100	0.016	1	6100	0.033	1	6100	0.049
08:30 - 09:00	1	6100	0.000	1	6100	0.016	1	6100	0.016
09:00 - 09:30	1	6100	0.033	1	6100	0.016	1	6100	0.049
09:30 - 10:00	1	6100	0.033	1	6100	0.016	1	6100	0.049
10:00 - 10:30	1	6100	0.016	1	<b>6100</b>	<b>0.066</b>	1	6100	0.082
10:30 - 11:00	1	6100	0.049	1	6100	0.049	1	6100	0.098
11:00 - 11:30	1	6100	0.033	1	6100	0.016	1	6100	0.049
11:30 - 12:00	1	6100	0.033	1	6100	0.049	1	6100	0.082
12:00 - 12:30	1	6100	0.016	1	6100	0.000	1	6100	0.016
12:30 - 13:00	1	6100	0.000	1	6100	0.033	1	6100	0.033
13:00 - 13:30	1	6100	0.033	1	6100	0.000	1	6100	0.033
13:30 - 14:00	1	6100	0.033	1	6100	0.033	1	6100	0.066
14:00 - 14:30	1	6100	0.000	1	6100	0.049	1	6100	0.049
14:30 - 15:00	1	<b>6100</b>	<b>0.066</b>	1	6100	0.049	1	<b>6100</b>	<b>0.115</b>
15:00 - 15:30	1	6100	0.000	1	6100	0.016	1	6100	0.016
15:30 - 16:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:00 - 16:30	1	6100	0.016	1	6100	0.000	1	6100	0.016
16:30 - 17:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:00 - 17:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:30 - 18:00	1	6100	0.016	1	6100	0.000	1	6100	0.016
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.458			0.473			0.931

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.



**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

**MULTI-MODAL PSVS**

**Calculation factor: 100 sqm**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
06:30 - 07:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:00 - 07:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:30 - 08:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:30 - 11:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:00 - 11:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:30 - 12:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:00 - 12:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:30 - 13:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:00 - 13:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:30 - 14:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:00 - 14:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:30 - 16:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:00 - 16:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:30 - 17:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:00 - 17:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:30 - 18:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.000			0.000			0.000

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL CYCLISTS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
06:30 - 07:00	<b>1</b>	<b>6100</b>	<b>0.098</b>	1	6100	0.000	1	6100	0.098
07:00 - 07:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:30 - 08:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.000	1	6100	0.016	1	6100	0.016
10:30 - 11:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:00 - 11:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:30 - 12:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:00 - 12:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:30 - 13:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:00 - 13:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:30 - 14:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:00 - 14:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.000	1	6100	0.016	1	6100	0.016
15:30 - 16:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:00 - 16:30	1	6100	0.016	1	6100	0.000	1	6100	0.016
16:30 - 17:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:00 - 17:30	1	6100	0.016	<b>1</b>	<b>6100</b>	<b>0.098</b>	<b>1</b>	<b>6100</b>	<b>0.114</b>
17:30 - 18:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.130			0.130			0.260

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL VEHICLE OCCUPANTS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.131	1	6100	0.000	1	6100	0.131
06:30 - 07:00	<b>1</b>	<b>6100</b>	<b>0.492</b>	1	6100	0.000	<b>1</b>	<b>6100</b>	<b>0.492</b>
07:00 - 07:30	1	6100	0.115	1	6100	0.148	1	6100	0.263
07:30 - 08:00	1	6100	0.098	1	6100	0.049	1	6100	0.147
08:00 - 08:30	1	6100	0.033	1	6100	0.049	1	6100	0.082
08:30 - 09:00	1	6100	0.082	1	6100	0.016	1	6100	0.098
09:00 - 09:30	1	6100	0.082	1	6100	0.082	1	6100	0.164
09:30 - 10:00	1	6100	0.082	1	6100	0.016	1	6100	0.098
10:00 - 10:30	1	6100	0.131	1	6100	0.115	1	6100	0.246
10:30 - 11:00	1	6100	0.066	1	6100	0.115	1	6100	0.181
11:00 - 11:30	1	6100	0.082	1	6100	0.033	1	6100	0.115
11:30 - 12:00	1	6100	0.033	1	6100	0.098	1	6100	0.131
12:00 - 12:30	1	6100	0.033	1	6100	0.016	1	6100	0.049
12:30 - 13:00	1	6100	0.000	1	6100	0.066	1	6100	0.066
13:00 - 13:30	1	6100	0.033	1	6100	0.082	1	6100	0.115
13:30 - 14:00	1	6100	0.082	1	6100	0.049	1	6100	0.131
14:00 - 14:30	1	6100	0.016	1	6100	0.066	1	6100	0.082
14:30 - 15:00	1	6100	0.098	1	6100	0.098	1	6100	0.196
15:00 - 15:30	1	6100	0.082	1	6100	0.049	1	6100	0.131
15:30 - 16:00	1	6100	0.066	1	6100	0.016	1	6100	0.082
16:00 - 16:30	1	6100	0.164	1	6100	0.082	1	6100	0.246
16:30 - 17:00	1	6100	0.230	1	6100	0.049	1	6100	0.279
17:00 - 17:30	1	6100	0.016	<b>1</b>	<b>6100</b>	<b>0.443</b>	1	6100	0.459
17:30 - 18:00	1	6100	0.016	1	6100	0.131	1	6100	0.147
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			2.263			1.868			4.131

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*



TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

**MULTI-MODAL PEDESTRIANS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.164	1	6100	0.000	1	6100	0.164
06:30 - 07:00	<b>1</b>	<b>6100</b>	<b>1.295</b>	1	6100	0.098	1	6100	1.393
07:00 - 07:30	1	6100	0.033	1	6100	0.049	1	6100	0.082
07:30 - 08:00	1	6100	0.033	1	6100	0.000	1	6100	0.033
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.049	1	6100	0.033	1	6100	0.082
10:30 - 11:00	1	6100	0.033	1	6100	0.000	1	6100	0.033
11:00 - 11:30	1	6100	0.115	1	6100	0.082	1	6100	0.197
11:30 - 12:00	1	6100	0.066	1	6100	0.016	1	6100	0.082
12:00 - 12:30	1	6100	0.016	1	6100	0.016	1	6100	0.032
12:30 - 13:00	1	6100	0.033	1	6100	0.049	1	6100	0.082
13:00 - 13:30	1	6100	0.000	1	6100	0.049	1	6100	0.049
13:30 - 14:00	1	6100	0.066	1	6100	0.000	1	6100	0.066
14:00 - 14:30	1	6100	0.033	1	6100	0.000	1	6100	0.033
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.066	1	6100	0.016	1	6100	0.082
15:30 - 16:00	1	6100	0.082	1	6100	0.033	1	6100	0.115
16:00 - 16:30	1	6100	0.328	1	6100	0.016	1	6100	0.344
16:30 - 17:00	1	6100	1.033	1	6100	0.033	1	6100	1.066
17:00 - 17:30	1	6100	0.016	<b>1</b>	<b>6100</b>	<b>1.918</b>	<b>1</b>	<b>6100</b>	<b>1.934</b>
17:30 - 18:00	1	6100	0.000	1	6100	0.033	1	6100	0.033
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			3.461			2.441			5.902

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL BUS/ TRAM PASSENGERS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.148	1	6100	0.000	1	6100	0.148
06:30 - 07:00	<b>1</b>	<b>6100</b>	<b>0.279</b>	1	6100	0.000	1	6100	0.279
07:00 - 07:30	1	6100	0.033	1	6100	0.000	1	6100	0.033
07:30 - 08:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:30 - 11:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:00 - 11:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:30 - 12:00	1	6100	0.016	1	6100	0.000	1	6100	0.016
12:00 - 12:30	1	6100	0.016	1	6100	0.000	1	6100	0.016
12:30 - 13:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:00 - 13:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:30 - 14:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:00 - 14:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.000	1	6100	0.016	1	6100	0.016
15:30 - 16:00	1	6100	0.000	1	6100	0.033	1	6100	0.033
16:00 - 16:30	1	6100	0.049	1	6100	0.000	1	6100	0.049
16:30 - 17:00	1	6100	0.049	1	6100	0.000	1	6100	0.049
17:00 - 17:30	1	6100	0.000	<b>1</b>	<b>6100</b>	<b>0.574</b>	<b>1</b>	<b>6100</b>	<b>0.574</b>
17:30 - 18:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.590			0.623			1.213

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL TOTAL RAIL PASSENGERS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	<b>1</b>	<b>6100</b>	<b>0.033</b>	<b>1</b>	<b>6100</b>	<b>0.000</b>	<b>1</b>	<b>6100</b>	<b>0.033</b>
06:30 - 07:00	1	6100	0.033	1	6100	0.000	1	6100	0.033
07:00 - 07:30	1	6100	0.033	1	6100	0.016	1	6100	0.049
07:30 - 08:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.016	1	6100	0.000	1	6100	0.016
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:30 - 11:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:00 - 11:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:30 - 12:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:00 - 12:30	1	6100	0.016	1	6100	0.000	1	6100	0.016
12:30 - 13:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:00 - 13:30	1	6100	0.000	1	6100	0.016	1	6100	0.016
13:30 - 14:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:00 - 14:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:30 - 16:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:00 - 16:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:30 - 17:00	1	6100	0.016	1	6100	0.000	1	6100	0.016
17:00 - 17:30	1	6100	0.000	<b>1</b>	<b>6100</b>	<b>0.115</b>	<b>1</b>	<b>6100</b>	<b>0.115</b>
17:30 - 18:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.147			0.147			0.294

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL COACH PASSENGERS**

**Calculation factor: 100 sqm**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
06:30 - 07:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:00 - 07:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
07:30 - 08:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:30 - 11:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:00 - 11:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:30 - 12:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:00 - 12:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
12:30 - 13:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:00 - 13:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:30 - 14:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:00 - 14:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:30 - 16:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:00 - 16:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
16:30 - 17:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:00 - 17:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
17:30 - 18:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.000			0.000			0.000

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.



**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL PUBLIC TRANSPORT USERS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.180	1	6100	0.000	1	6100	0.180
06:30 - 07:00	<b>1</b>	<b>6100</b>	<b>0.311</b>	1	6100	0.000	1	6100	0.311
07:00 - 07:30	1	6100	0.066	1	6100	0.016	1	6100	0.082
07:30 - 08:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:00 - 08:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
08:30 - 09:00	1	6100	0.016	1	6100	0.000	1	6100	0.016
09:00 - 09:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
09:30 - 10:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:00 - 10:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
10:30 - 11:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:00 - 11:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
11:30 - 12:00	1	6100	0.016	1	6100	0.000	1	6100	0.016
12:00 - 12:30	1	6100	0.033	1	6100	0.000	1	6100	0.033
12:30 - 13:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
13:00 - 13:30	1	6100	0.000	1	6100	0.016	1	6100	0.016
13:30 - 14:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:00 - 14:30	1	6100	0.000	1	6100	0.000	1	6100	0.000
14:30 - 15:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
15:00 - 15:30	1	6100	0.000	1	6100	0.016	1	6100	0.016
15:30 - 16:00	1	6100	0.000	1	6100	0.033	1	6100	0.033
16:00 - 16:30	1	6100	0.049	1	6100	0.000	1	6100	0.049
16:30 - 17:00	1	6100	0.066	1	6100	0.000	1	6100	0.066
17:00 - 17:30	1	6100	0.000	<b>1</b>	<b>6100</b>	<b>0.689</b>	<b>1</b>	<b>6100</b>	<b>0.689</b>
17:30 - 18:00	1	6100	0.000	1	6100	0.000	1	6100	0.000
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.737			0.770			1.507

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

# **MULTI-MODAL TOTAL PEOPLE**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30	1	6100	0.475	1	6100	0.000	1	6100	0.475
06:30 - 07:00	<b>1</b>	<b>6100</b>	<b>2.197</b>	1	6100	0.098	1	6100	2.295
07:00 - 07:30	1	6100	0.213	1	6100	0.213	1	6100	0.426
07:30 - 08:00	1	6100	0.131	1	6100	0.049	1	6100	0.180
08:00 - 08:30	1	6100	0.033	1	6100	0.049	1	6100	0.082
08:30 - 09:00	1	6100	0.098	1	6100	0.016	1	6100	0.114
09:00 - 09:30	1	6100	0.082	1	6100	0.082	1	6100	0.164
09:30 - 10:00	1	6100	0.082	1	6100	0.016	1	6100	0.098
10:00 - 10:30	1	6100	0.180	1	6100	0.164	1	6100	0.344
10:30 - 11:00	1	6100	0.098	1	6100	0.115	1	6100	0.213
11:00 - 11:30	1	6100	0.197	1	6100	0.115	1	6100	0.312
11:30 - 12:00	1	6100	0.115	1	6100	0.115	1	6100	0.230
12:00 - 12:30	1	6100	0.082	1	6100	0.033	1	6100	0.115
12:30 - 13:00	1	6100	0.033	1	6100	0.115	1	6100	0.148
13:00 - 13:30	1	6100	0.033	1	6100	0.148	1	6100	0.181
13:30 - 14:00	1	6100	0.148	1	6100	0.049	1	6100	0.197
14:00 - 14:30	1	6100	0.049	1	6100	0.066	1	6100	0.115
14:30 - 15:00	1	6100	0.098	1	6100	0.098	1	6100	0.196
15:00 - 15:30	1	6100	0.148	1	6100	0.098	1	6100	0.246
15:30 - 16:00	1	6100	0.148	1	6100	0.082	1	6100	0.230
16:00 - 16:30	1	6100	0.557	1	6100	0.098	1	6100	0.655
16:30 - 17:00	1	6100	1.328	1	6100	0.082	1	6100	1.410
17:00 - 17:30	1	6100	0.049	<b>1</b>	<b>6100</b>	<b>3.148</b>	<b>1</b>	<b>6100</b>	<b>3.197</b>
17:30 - 18:00	1	6100	0.016	1	6100	0.164	1	6100	0.180
18:00 - 18:30									
18:30 - 19:00									
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			6.590			5.213			11.803

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	6100 - 6100 (units: sqm)
Survey date date range:	01/01/08 - 10/09/14
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

Calculation Reference: AUDIT-846402-160405-0457

**TRIP RATE CALCULATION SELECTION PARAMETERS:**

Land Use : 03 - RESIDENTIAL

Category : M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL VEHICLES**Selected regions and areas:**01 GREATER LONDON**

EG	EALING	1 days
HD	HILLINGDON	2 days

*This section displays the number of survey days per TRICS® sub-region in the selected set***Filtering Stage 2 selection:***This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.*

Parameter:	Number of dwellings
Actual Range:	45 to 261 (units: )
Range Selected by User:	40 to 1751 (units: )

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/08 to 09/12/14

*This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.*Selected survey days:

Tuesday	1 days
Thursday	2 days

*This data displays the number of selected surveys by day of the week.*Selected survey types:

Manual count	3 days
Directional ATC Count	0 days

*This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.*Selected Locations:

Suburban Area (PPS6 Out of Centre)	1
Neighbourhood Centre (PPS6 Local Centre)	2

*This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.*Selected Location Sub Categories:

Residential Zone	3
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*This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.*

**Filtering Stage 3 selection:**Use Class:

C3

3 days

*This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.*

Population within 1 mile:

25,001 to 50,000

3 days

*This data displays the number of selected surveys within stated 1-mile radii of population.*

Population within 5 miles:

500,001 or More

3 days

*This data displays the number of selected surveys within stated 5-mile radii of population.*

Car ownership within 5 miles:

0.6 to 1.0

1 days

1.1 to 1.5

2 days

*This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.*

Travel Plan:

Yes

3 days

*This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.*



LIST OF SITES relevant to selection parameters

<b>1</b>	<b>EG-03-M-02</b>	<b>BLOCKS OF FLATS</b>	<b>EALING</b>
	FEATHERSTONE ROAD		
	SOUTHALL		
	Neighbourhood Centre (PPS6 Local Centre)		
	Residential Zone		
	Total Number of dwellings:	143	
	Survey date: THURSDAY	17/07/14	Survey Type: MANUAL
<b>2</b>	<b>HD-03-M-01</b>	<b>BLOCK OF FLATS</b>	<b>HILLINGDON</b>
	UXBRIDGE ROAD		
	HAYES		
	Neighbourhood Centre (PPS6 Local Centre)		
	Residential Zone		
	Total Number of dwellings:	45	
	Survey date: THURSDAY	11/09/14	Survey Type: MANUAL
<b>3</b>	<b>HD-03-M-03</b>	<b>TERRACED &amp; FLATS</b>	<b>HILLINGDON</b>
	JUDGE HEATH LANE		
	HAYES		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	261	
	Survey date: TUESDAY	09/12/14	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
HM-03-M-01	Quantum too large

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL VEHICLES****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.065	3	150	0.178	3	150	0.243
08:00 - 09:00	3	150	0.078	<b>3</b>	<b>150</b>	<b>0.249</b>	<b>3</b>	<b>150</b>	<b>0.327</b>
09:00 - 10:00	3	150	0.076	3	150	0.109	3	150	0.185
10:00 - 11:00	3	150	0.053	3	150	0.107	3	150	0.160
11:00 - 12:00	3	150	0.076	3	150	0.060	3	150	0.136
12:00 - 13:00	3	150	0.065	3	150	0.085	3	150	0.150
13:00 - 14:00	3	150	0.076	3	150	0.091	3	150	0.167
14:00 - 15:00	3	150	0.069	3	150	0.116	3	150	0.185
15:00 - 16:00	3	150	0.163	3	150	0.122	3	150	0.285
16:00 - 17:00	3	150	0.125	3	150	0.076	3	150	0.201
17:00 - 18:00	3	150	0.165	3	150	0.089	3	150	0.254
18:00 - 19:00	<b>3</b>	<b>150</b>	<b>0.200</b>	3	150	0.096	3	150	0.296
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.211			1.378			2.589

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL TAXIS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.004	<b>3</b>	<b>150</b>	<b>0.007</b>	3	150	0.011
08:00 - 09:00	<b>3</b>	<b>150</b>	<b>0.007</b>	3	150	0.007	<b>3</b>	<b>150</b>	<b>0.014</b>
09:00 - 10:00	3	150	0.002	3	150	0.002	3	150	0.004
10:00 - 11:00	3	150	0.000	3	150	0.000	3	150	0.000
11:00 - 12:00	3	150	0.000	3	150	0.000	3	150	0.000
12:00 - 13:00	3	150	0.002	3	150	0.002	3	150	0.004
13:00 - 14:00	3	150	0.002	3	150	0.002	3	150	0.004
14:00 - 15:00	3	150	0.002	3	150	0.002	3	150	0.004
15:00 - 16:00	3	150	0.000	3	150	0.000	3	150	0.000
16:00 - 17:00	3	150	0.000	3	150	0.000	3	150	0.000
17:00 - 18:00	3	150	0.004	3	150	0.004	3	150	0.008
18:00 - 19:00	3	150	0.004	3	150	0.004	3	150	0.008
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.027			0.030			0.057

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL OGVS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.000	3	150	0.000	3	150	0.000
08:00 - 09:00	<b>3</b>	<b>150</b>	<b>0.004</b>	<b>3</b>	<b>150</b>	<b>0.004</b>	<b>3</b>	<b>150</b>	<b>0.008</b>
09:00 - 10:00	3	150	0.000	3	150	0.000	3	150	0.000
10:00 - 11:00	3	150	0.004	3	150	0.002	3	150	0.006
11:00 - 12:00	3	150	0.000	3	150	0.002	3	150	0.002
12:00 - 13:00	3	150	0.000	3	150	0.000	3	150	0.000
13:00 - 14:00	3	150	0.004	3	150	0.004	3	150	0.008
14:00 - 15:00	3	150	0.000	3	150	0.000	3	150	0.000
15:00 - 16:00	3	150	0.000	3	150	0.000	3	150	0.000
16:00 - 17:00	3	150	0.000	3	150	0.000	3	150	0.000
17:00 - 18:00	3	150	0.000	3	150	0.000	3	150	0.000
18:00 - 19:00	3	150	0.000	3	150	0.000	3	150	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.012			0.012			0.024

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL PSVS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	<b>3</b>	<b>150</b>	<b>0.004</b>	<b>3</b>	<b>150</b>	<b>0.004</b>	<b>3</b>	<b>150</b>	<b>0.008</b>
08:00 - 09:00	3	150	0.000	3	150	0.000	3	150	0.000
09:00 - 10:00	3	150	0.000	3	150	0.000	3	150	0.000
10:00 - 11:00	3	150	0.000	3	150	0.000	3	150	0.000
11:00 - 12:00	3	150	0.000	3	150	0.000	3	150	0.000
12:00 - 13:00	3	150	0.000	3	150	0.000	3	150	0.000
13:00 - 14:00	3	150	0.002	3	150	0.002	3	150	0.004
14:00 - 15:00	3	150	0.000	3	150	0.000	3	150	0.000
15:00 - 16:00	3	150	0.000	3	150	0.000	3	150	0.000
16:00 - 17:00	3	150	0.000	3	150	0.000	3	150	0.000
17:00 - 18:00	3	150	0.002	3	150	0.002	3	150	0.004
18:00 - 19:00	3	150	0.000	3	150	0.000	3	150	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.008			0.008			0.016

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL CYCLISTS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.000	<b>3</b>	<b>150</b>	<b>0.004</b>	3	150	0.004
08:00 - 09:00	3	150	0.000	3	150	0.004	3	150	0.004
09:00 - 10:00	3	150	0.000	3	150	0.000	3	150	0.000
10:00 - 11:00	3	150	0.000	3	150	0.000	3	150	0.000
11:00 - 12:00	3	150	0.000	3	150	0.000	3	150	0.000
12:00 - 13:00	3	150	0.000	3	150	0.002	3	150	0.002
13:00 - 14:00	3	150	0.000	3	150	0.000	3	150	0.000
14:00 - 15:00	3	150	0.002	3	150	0.000	3	150	0.002
15:00 - 16:00	3	150	0.002	3	150	0.000	3	150	0.002
16:00 - 17:00	3	150	0.002	3	150	0.002	3	150	0.004
17:00 - 18:00	<b>3</b>	<b>150</b>	<b>0.009</b>	3	150	0.002	<b>3</b>	<b>150</b>	<b>0.011</b>
18:00 - 19:00	3	150	0.000	3	150	0.002	3	150	0.002
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.015			0.016			0.031

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL VEHICLE OCCUPANTS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.076	3	150	0.305	3	150	0.381
08:00 - 09:00	3	150	0.100	<b>3</b>	<b>150</b>	<b>0.399</b>	<b>3</b>	<b>150</b>	<b>0.499</b>
09:00 - 10:00	3	150	0.100	3	150	0.129	3	150	0.229
10:00 - 11:00	3	150	0.058	3	150	0.131	3	150	0.189
11:00 - 12:00	3	150	0.091	3	150	0.065	3	150	0.156
12:00 - 13:00	3	150	0.073	3	150	0.096	3	150	0.169
13:00 - 14:00	3	150	0.082	3	150	0.105	3	150	0.187
14:00 - 15:00	3	150	0.073	3	150	0.156	3	150	0.229
15:00 - 16:00	<b>3</b>	<b>150</b>	<b>0.294</b>	3	150	0.171	3	150	0.465
16:00 - 17:00	3	150	0.183	3	150	0.116	3	150	0.299
17:00 - 18:00	3	150	0.245	3	150	0.107	3	150	0.352
18:00 - 19:00	3	150	0.281	3	150	0.122	3	150	0.403
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.656			1.902			3.558

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.



TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL PEDESTRIANS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.004	3	150	0.067	3	150	0.071
08:00 - 09:00	3	150	0.029	<b>3</b>	<b>150</b>	<b>0.301</b>	<b>3</b>	<b>150</b>	<b>0.330</b>
09:00 - 10:00	3	150	0.091	3	150	0.051	3	150	0.142
10:00 - 11:00	3	150	0.029	3	150	0.020	3	150	0.049
11:00 - 12:00	3	150	0.036	3	150	0.073	3	150	0.109
12:00 - 13:00	3	150	0.067	3	150	0.049	3	150	0.116
13:00 - 14:00	3	150	0.038	3	150	0.036	3	150	0.074
14:00 - 15:00	3	150	0.053	3	150	0.094	3	150	0.147
15:00 - 16:00	<b>3</b>	<b>150</b>	<b>0.167</b>	3	150	0.020	3	150	0.187
16:00 - 17:00	3	150	0.102	3	150	0.040	3	150	0.142
17:00 - 18:00	3	150	0.045	3	150	0.042	3	150	0.087
18:00 - 19:00	3	150	0.082	3	150	0.036	3	150	0.118
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.743			0.829			1.572

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL BUS/ TRAM PASSENGERS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.004	3	150	0.094	3	150	0.098
08:00 - 09:00	3	150	0.011	<b>3</b>	<b>150</b>	<b>0.149</b>	<b>3</b>	<b>150</b>	<b>0.160</b>
09:00 - 10:00	3	150	0.038	3	150	0.027	3	150	0.065
10:00 - 11:00	3	150	0.011	3	150	0.013	3	150	0.024
11:00 - 12:00	3	150	0.013	3	150	0.022	3	150	0.035
12:00 - 13:00	3	150	0.024	3	150	0.020	3	150	0.044
13:00 - 14:00	3	150	0.020	3	150	0.018	3	150	0.038
14:00 - 15:00	3	150	0.016	3	150	0.022	3	150	0.038
15:00 - 16:00	<b>3</b>	<b>150</b>	<b>0.069</b>	3	150	0.013	3	150	0.082
16:00 - 17:00	3	150	0.058	3	150	0.007	3	150	0.065
17:00 - 18:00	3	150	0.036	3	150	0.002	3	150	0.038
18:00 - 19:00	3	150	0.058	3	150	0.002	3	150	0.060
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.358			0.389			0.747

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL TOTAL RAIL PASSENGERS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.000	<b>3</b>	<b>150</b>	<b>0.042</b>	3	150	0.042
08:00 - 09:00	3	150	0.002	3	150	0.042	3	150	0.044
09:00 - 10:00	3	150	0.000	3	150	0.011	3	150	0.011
10:00 - 11:00	3	150	0.002	3	150	0.007	3	150	0.009
11:00 - 12:00	3	150	0.011	3	150	0.007	3	150	0.018
12:00 - 13:00	3	150	0.004	3	150	0.009	3	150	0.013
13:00 - 14:00	3	150	0.007	3	150	0.007	3	150	0.014
14:00 - 15:00	3	150	0.007	3	150	0.007	3	150	0.014
15:00 - 16:00	3	150	0.011	3	150	0.004	3	150	0.015
16:00 - 17:00	3	150	0.029	3	150	0.002	3	150	0.031
17:00 - 18:00	<b>3</b>	<b>150</b>	<b>0.047</b>	3	150	0.004	<b>3</b>	<b>150</b>	<b>0.051</b>
18:00 - 19:00	3	150	0.031	3	150	0.002	3	150	0.033
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.151			0.144			0.295

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL COACH PASSENGERS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.000	3	150	0.000	3	150	0.000
08:00 - 09:00	3	150	0.000	3	150	0.000	3	150	0.000
09:00 - 10:00	3	150	0.000	3	150	0.000	3	150	0.000
10:00 - 11:00	3	150	0.000	3	150	0.000	3	150	0.000
11:00 - 12:00	3	150	0.000	3	150	0.000	3	150	0.000
12:00 - 13:00	3	150	0.000	3	150	0.000	3	150	0.000
13:00 - 14:00	3	150	0.000	3	150	0.000	3	150	0.000
14:00 - 15:00	3	150	0.000	3	150	0.000	3	150	0.000
15:00 - 16:00	3	150	0.000	3	150	0.000	3	150	0.000
16:00 - 17:00	3	150	0.000	3	150	0.000	3	150	0.000
17:00 - 18:00	3	150	0.000	3	150	0.000	3	150	0.000
18:00 - 19:00	3	150	0.000	3	150	0.000	3	150	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.000			0.000			0.000

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL PUBLIC TRANSPORT USERS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.004	3	150	0.136	3	150	0.140
08:00 - 09:00	3	150	0.013	<b>3</b>	<b>150</b>	<b>0.192</b>	<b>3</b>	<b>150</b>	<b>0.205</b>
09:00 - 10:00	3	150	0.038	3	150	0.038	3	150	0.076
10:00 - 11:00	3	150	0.013	3	150	0.020	3	150	0.033
11:00 - 12:00	3	150	0.024	3	150	0.029	3	150	0.053
12:00 - 13:00	3	150	0.029	3	150	0.029	3	150	0.058
13:00 - 14:00	3	150	0.027	3	150	0.024	3	150	0.051
14:00 - 15:00	3	150	0.022	3	150	0.029	3	150	0.051
15:00 - 16:00	3	150	0.080	3	150	0.018	3	150	0.098
16:00 - 17:00	3	150	0.087	3	150	0.009	3	150	0.096
17:00 - 18:00	3	150	0.082	3	150	0.007	3	150	0.089
18:00 - 19:00	<b>3</b>	<b>150</b>	<b>0.089</b>	3	150	0.004	3	150	0.093
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.508			0.535			1.043

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

**MULTI-MODAL TOTAL PEOPLE****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	150	0.085	3	150	0.512	3	150	0.597
08:00 - 09:00	3	150	0.143	<b>3</b>	<b>150</b>	<b>0.895</b>	<b>3</b>	<b>150</b>	<b>1.038</b>
09:00 - 10:00	3	150	0.229	3	150	0.218	3	150	0.447
10:00 - 11:00	3	150	0.100	3	150	0.171	3	150	0.271
11:00 - 12:00	3	150	0.151	3	150	0.167	3	150	0.318
12:00 - 13:00	3	150	0.169	3	150	0.176	3	150	0.345
13:00 - 14:00	3	150	0.147	3	150	0.165	3	150	0.312
14:00 - 15:00	3	150	0.151	3	150	0.278	3	150	0.429
15:00 - 16:00	<b>3</b>	<b>150</b>	<b>0.543</b>	3	150	0.209	3	150	0.752
16:00 - 17:00	3	150	0.374	3	150	0.167	3	150	0.541
17:00 - 18:00	3	150	0.381	3	150	0.158	3	150	0.539
18:00 - 19:00	3	150	0.452	3	150	0.165	3	150	0.617
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.925			3.281			6.206

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP * FACT$ . Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected: 45 - 261 (units: )  
 Survey date range: 01/01/08 - 09/12/14  
 Number of weekdays (Monday-Friday): 3  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Calculation Reference: AUDIT-846402-160405-0407

## TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT  
Category : A - OFFICE

### MULTI-MODAL VEHICLES

#### Selected regions and areas:

<b>01 GREATER LONDON</b>	
BT BRENT	1 days
IS ISLINGTON	1 days
SK SOUTHWARK	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

## Filtering Stage 2 selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Gross floor area  
Actual Range: 2371 to 5500 (units: sqm)  
Range Selected by User: 408 to 5000 (units: sqm)

#### Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/08 to 19/05/15

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

#### Selected survey days:

Monday	1 days
Tuesday	1 days
Friday	1 days

This data displays the number of selected surveys by day of the week.

#### Selected survey types:

Manual count	3 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

#### Selected Locations:

Edge of Town Centre	1
Suburban Area (PPS6 Out of Centre)	2

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

#### Selected Location Sub Categories:

Commercial Zone	1
Built-Up Zone	2

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.



### Filtering Stage 3 selection:

#### Use Class:

B1 3 days

*This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.*

#### Population within 1 mile:

25,001 to 50,000 1 days

50,001 to 100,000 1 days

101,000 or More 1 days

*This data displays the number of selected surveys within stated 1-mile radii of population.*

#### Population within 5 miles:

500,001 or More 3 days

*This data displays the number of selected surveys within stated 5-mile radii of population.*

#### Car ownership within 5 miles:

0.5 or Less 2 days

0.6 to 1.0 1 days

*This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.*

#### Travel Plan:

No 3 days

*This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.*

LIST OF SITES relevant to selection parameters

<b>1</b>	<b>BT-02-A-02</b>	<b>OFFICE</b>	<b>BRENT</b>
	WEMBLEY HILL ROAD		
	WEMBLEY		
	Suburban Area (PPS6 Out of Centre)		
	Built-Up Zone		
	Total Gross floor area:	4750 sqm	
	Survey date: TUESDAY	22/06/10	Survey Type: MANUAL
<b>2</b>	<b>IS-02-A-01</b>	<b>OFFICES</b>	<b>ISLINGTON</b>
	ESSEX ROAD		
	ISLINGTON		
	Suburban Area (PPS6 Out of Centre)		
	Built-Up Zone		
	Total Gross floor area:	5500 sqm	
	Survey date: FRIDAY	24/10/08	Survey Type: MANUAL
<b>3</b>	<b>SK-02-A-02</b>	<b>OFFICES</b>	<b>SOUTHWARK</b>
	ST OLAV'S COURT		
	ROTHERHITHE		
	Edge of Town Centre		
	Commercial Zone		
	Total Gross floor area:	2371 sqm	
	Survey date: MONDAY	20/10/08	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
CN-02-A-01	Too central
HD-02-A-07	GFA too large

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

**MULTI-MODAL VEHICLES****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.055	3	4207	0.032	3	4207	0.087
07:30 - 08:00	3	4207	0.246	3	4207	0.032	3	4207	0.278
08:00 - 08:30	3	4207	0.222	3	4207	0.048	3	4207	0.270
08:30 - 09:00	3	4207	0.222	3	4207	0.048	3	4207	0.270
09:00 - 09:30	3	4207	0.269	3	4207	0.087	3	4207	0.356
09:30 - 10:00	<b>3</b>	<b>4207</b>	<b>0.325</b>	3	4207	0.119	<b>3</b>	<b>4207</b>	<b>0.444</b>
10:00 - 10:30	3	4207	0.309	3	4207	0.127	3	4207	0.436
10:30 - 11:00	3	4207	0.158	3	4207	0.151	3	4207	0.309
11:00 - 11:30	3	4207	0.151	3	4207	0.158	3	4207	0.309
11:30 - 12:00	3	4207	0.111	3	4207	0.071	3	4207	0.182
12:00 - 12:30	3	4207	0.158	3	4207	0.182	3	4207	0.340
12:30 - 13:00	3	4207	0.151	3	4207	0.182	3	4207	0.333
13:00 - 13:30	3	4207	0.119	3	4207	0.182	3	4207	0.301
13:30 - 14:00	3	4207	0.071	3	4207	0.071	3	4207	0.142
14:00 - 14:30	3	4207	0.206	3	4207	0.151	3	4207	0.357
14:30 - 15:00	3	4207	0.182	3	4207	0.103	3	4207	0.285
15:00 - 15:30	3	4207	0.119	3	4207	0.166	3	4207	0.285
15:30 - 16:00	3	4207	0.119	3	4207	0.119	3	4207	0.238
16:00 - 16:30	3	4207	0.087	3	4207	0.222	3	4207	0.309
16:30 - 17:00	3	4207	0.087	3	4207	0.190	3	4207	0.277
17:00 - 17:30	3	4207	0.095	<b>3</b>	<b>4207</b>	<b>0.293</b>	3	4207	0.388
17:30 - 18:00	3	4207	0.048	3	4207	0.174	3	4207	0.222
18:00 - 18:30	3	4207	0.079	3	4207	0.222	3	4207	0.301
18:30 - 19:00	3	4207	0.016	3	4207	0.111	3	4207	0.127
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			3.605			3.241			6.846

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

**MULTI-MODAL TAXIS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	<b>3</b>	<b>4207</b>	<b>0.008</b>	<b>3</b>	<b>4207</b>	<b>0.008</b>	<b>3</b>	<b>4207</b>	<b>0.016</b>
07:30 - 08:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
08:00 - 08:30	3	4207	0.008	3	4207	0.008	3	4207	0.016
08:30 - 09:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
09:00 - 09:30	3	4207	0.008	3	4207	0.008	3	4207	0.016
09:30 - 10:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
10:00 - 10:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
10:30 - 11:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
11:00 - 11:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
11:30 - 12:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
12:00 - 12:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
12:30 - 13:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
13:00 - 13:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
13:30 - 14:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:00 - 14:30	3	4207	0.008	3	4207	0.008	3	4207	0.016
14:30 - 15:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
15:00 - 15:30	3	4207	0.008	3	4207	0.008	3	4207	0.016
15:30 - 16:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
16:00 - 16:30	3	4207	0.008	3	4207	0.008	3	4207	0.016
16:30 - 17:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
17:00 - 17:30	3	4207	0.008	3	4207	0.008	3	4207	0.016
17:30 - 18:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
18:00 - 18:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
18:30 - 19:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.104			0.104			0.208

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

**MULTI-MODAL OGVS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
07:30 - 08:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
08:00 - 08:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
08:30 - 09:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
09:00 - 09:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
09:30 - 10:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
10:00 - 10:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
10:30 - 11:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
11:00 - 11:30	<b>3</b>	<b>4207</b>	<b>0.008</b>	3	4207	0.000	3	4207	0.008
11:30 - 12:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
12:00 - 12:30	3	4207	0.000	<b>3</b>	<b>4207</b>	<b>0.008</b>	3	4207	0.008
12:30 - 13:00	3	4207	0.008	3	4207	0.008	<b>3</b>	<b>4207</b>	<b>0.016</b>
13:00 - 13:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
13:30 - 14:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:00 - 14:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:30 - 15:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
15:00 - 15:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
15:30 - 16:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
16:00 - 16:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
16:30 - 17:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
17:00 - 17:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
17:30 - 18:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
18:00 - 18:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
18:30 - 19:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.024			0.024			0.048

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.



### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

**MULTI-MODAL PSVS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
07:30 - 08:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
08:00 - 08:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
08:30 - 09:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
09:00 - 09:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
09:30 - 10:00	<b>3</b>	<b>4207</b>	<b>0.008</b>	<b>3</b>	<b>4207</b>	<b>0.008</b>	<b>3</b>	<b>4207</b>	<b>0.016</b>
10:00 - 10:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
10:30 - 11:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
11:00 - 11:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
11:30 - 12:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
12:00 - 12:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
12:30 - 13:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
13:00 - 13:30	3	4207	0.008	3	4207	0.008	3	4207	0.016
13:30 - 14:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:00 - 14:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:30 - 15:00	3	4207	0.008	3	4207	0.000	3	4207	0.008
15:00 - 15:30	3	4207	0.000	3	4207	0.008	3	4207	0.008
15:30 - 16:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
16:00 - 16:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
16:30 - 17:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
17:00 - 17:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
17:30 - 18:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
18:00 - 18:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
18:30 - 19:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.024			0.024			0.048

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

# **MULTI-MODAL CYCLISTS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
07:30 - 08:00	3	4207	0.008	3	4207	0.000	3	4207	0.008
08:00 - 08:30	3	4207	0.016	3	4207	0.000	3	4207	0.016
08:30 - 09:00	3	4207	0.000	3	4207	0.008	3	4207	0.008
09:00 - 09:30	<b>3</b>	<b>4207</b>	<b>0.024</b>	3	4207	0.000	3	4207	0.024
09:30 - 10:00	3	4207	0.024	3	4207	0.000	3	4207	0.024
10:00 - 10:30	3	4207	0.000	3	4207	0.008	3	4207	0.008
10:30 - 11:00	3	4207	0.008	3	4207	0.008	3	4207	0.016
11:00 - 11:30	3	4207	0.000	3	4207	0.008	3	4207	0.008
11:30 - 12:00	3	4207	0.016	3	4207	0.008	3	4207	0.024
12:00 - 12:30	3	4207	0.000	3	4207	0.008	3	4207	0.008
12:30 - 13:00	3	4207	0.016	3	4207	0.008	3	4207	0.024
13:00 - 13:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
13:30 - 14:00	3	4207	0.000	3	4207	0.008	3	4207	0.008
14:00 - 14:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:30 - 15:00	3	4207	0.008	3	4207	0.000	3	4207	0.008
15:00 - 15:30	3	4207	0.016	3	4207	0.024	3	4207	0.040
15:30 - 16:00	3	4207	0.008	3	4207	0.016	3	4207	0.024
16:00 - 16:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
16:30 - 17:00	3	4207	0.008	3	4207	0.000	3	4207	0.008
17:00 - 17:30	3	4207	0.000	<b>3</b>	<b>4207</b>	<b>0.048</b>	<b>3</b>	<b>4207</b>	<b>0.048</b>
17:30 - 18:00	3	4207	0.000	3	4207	0.032	3	4207	0.032
18:00 - 18:30	3	4207	0.008	3	4207	0.000	3	4207	0.008
18:30 - 19:00	3	4207	0.008	3	4207	0.016	3	4207	0.024
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.168			0.200			0.368

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

**MULTI-MODAL VEHICLE OCCUPANTS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.055	3	4207	0.032	3	4207	0.087
07:30 - 08:00	3	4207	0.261	3	4207	0.032	3	4207	0.293
08:00 - 08:30	3	4207	0.277	3	4207	0.071	3	4207	0.348
08:30 - 09:00	3	4207	0.238	3	4207	0.040	3	4207	0.278
09:00 - 09:30	3	4207	0.341	3	4207	0.095	3	4207	0.436
09:30 - 10:00	<b>3</b>	<b>4207</b>	<b>0.396</b>	3	4207	0.111	3	4207	0.507
10:00 - 10:30	3	4207	0.372	3	4207	0.151	3	4207	0.523
10:30 - 11:00	3	4207	0.198	3	4207	0.151	3	4207	0.349
11:00 - 11:30	3	4207	0.261	3	4207	0.230	3	4207	0.491
11:30 - 12:00	3	4207	0.135	3	4207	0.087	3	4207	0.222
12:00 - 12:30	3	4207	0.190	3	4207	0.230	3	4207	0.420
12:30 - 13:00	3	4207	0.206	3	4207	0.246	3	4207	0.452
13:00 - 13:30	3	4207	0.151	3	4207	0.214	3	4207	0.365
13:30 - 14:00	3	4207	0.087	3	4207	0.095	3	4207	0.182
14:00 - 14:30	3	4207	0.269	3	4207	0.174	3	4207	0.443
14:30 - 15:00	3	4207	0.206	3	4207	0.127	3	4207	0.333
15:00 - 15:30	3	4207	0.151	3	4207	0.230	3	4207	0.381
15:30 - 16:00	3	4207	0.166	3	4207	0.174	3	4207	0.340
16:00 - 16:30	3	4207	0.111	3	4207	0.277	3	4207	0.388
16:30 - 17:00	3	4207	0.103	3	4207	0.254	3	4207	0.357
17:00 - 17:30	3	4207	0.143	<b>3</b>	<b>4207</b>	<b>0.412</b>	<b>3</b>	<b>4207</b>	<b>0.555</b>
17:30 - 18:00	3	4207	0.055	3	4207	0.277	3	4207	0.332
18:00 - 18:30	3	4207	0.087	3	4207	0.317	3	4207	0.404
18:30 - 19:00	3	4207	0.016	3	4207	0.158	3	4207	0.174
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			4.475			4.185			8.660

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*



TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

**MULTI-MODAL PEDESTRIANS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.016	3	4207	0.000	3	4207	0.016
07:30 - 08:00	3	4207	0.040	3	4207	0.008	3	4207	0.048
08:00 - 08:30	3	4207	0.087	3	4207	0.008	3	4207	0.095
08:30 - 09:00	3	4207	0.230	3	4207	0.048	3	4207	0.278
09:00 - 09:30	3	4207	0.198	3	4207	0.087	3	4207	0.285
09:30 - 10:00	3	4207	0.206	3	4207	0.119	3	4207	0.325
10:00 - 10:30	3	4207	0.158	3	4207	0.087	3	4207	0.245
10:30 - 11:00	3	4207	0.166	3	4207	0.222	3	4207	0.388
11:00 - 11:30	3	4207	0.111	3	4207	0.087	3	4207	0.198
11:30 - 12:00	3	4207	0.103	3	4207	0.190	3	4207	0.293
12:00 - 12:30	3	4207	0.349	<b>3</b>	<b>4207</b>	<b>0.737</b>	3	4207	1.086
12:30 - 13:00	3	4207	0.364	3	4207	0.578	3	4207	0.942
13:00 - 13:30	3	4207	0.563	3	4207	0.634	<b>3</b>	<b>4207</b>	<b>1.197</b>
13:30 - 14:00	<b>3</b>	<b>4207</b>	<b>0.650</b>	3	4207	0.301	3	4207	0.951
14:00 - 14:30	3	4207	0.467	3	4207	0.222	3	4207	0.689
14:30 - 15:00	3	4207	0.285	3	4207	0.063	3	4207	0.348
15:00 - 15:30	3	4207	0.151	3	4207	0.111	3	4207	0.262
15:30 - 16:00	3	4207	0.325	3	4207	0.230	3	4207	0.555
16:00 - 16:30	3	4207	0.166	3	4207	0.087	3	4207	0.253
16:30 - 17:00	3	4207	0.151	3	4207	0.095	3	4207	0.246
17:00 - 17:30	3	4207	0.087	3	4207	0.166	3	4207	0.253
17:30 - 18:00	3	4207	0.032	3	4207	0.158	3	4207	0.190
18:00 - 18:30	3	4207	0.032	3	4207	0.032	3	4207	0.064
18:30 - 19:00	3	4207	0.032	3	4207	0.032	3	4207	0.064
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			4.969			4.302			9.271

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

**MULTI-MODAL BUS/ TRAM PASSENGERS****Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
07:30 - 08:00	3	4207	0.016	3	4207	0.000	3	4207	0.016
08:00 - 08:30	3	4207	0.071	3	4207	0.008	3	4207	0.079
08:30 - 09:00	3	4207	0.246	3	4207	0.000	3	4207	0.246
09:00 - 09:30	<b>3</b>	<b>4207</b>	<b>0.254</b>	3	4207	0.016	3	4207	0.270
09:30 - 10:00	3	4207	0.214	3	4207	0.008	3	4207	0.222
10:00 - 10:30	3	4207	0.190	3	4207	0.063	3	4207	0.253
10:30 - 11:00	3	4207	0.174	3	4207	0.040	3	4207	0.214
11:00 - 11:30	3	4207	0.071	3	4207	0.063	3	4207	0.134
11:30 - 12:00	3	4207	0.095	3	4207	0.048	3	4207	0.143
12:00 - 12:30	3	4207	0.063	3	4207	0.111	3	4207	0.174
12:30 - 13:00	3	4207	0.048	3	4207	0.079	3	4207	0.127
13:00 - 13:30	3	4207	0.127	3	4207	0.119	3	4207	0.246
13:30 - 14:00	3	4207	0.087	3	4207	0.079	3	4207	0.166
14:00 - 14:30	3	4207	0.095	3	4207	0.071	3	4207	0.166
14:30 - 15:00	3	4207	0.127	3	4207	0.119	3	4207	0.246
15:00 - 15:30	3	4207	0.071	3	4207	0.071	3	4207	0.142
15:30 - 16:00	3	4207	0.048	3	4207	0.079	3	4207	0.127
16:00 - 16:30	3	4207	0.048	<b>3</b>	<b>4207</b>	<b>0.238</b>	<b>3</b>	<b>4207</b>	<b>0.286</b>
16:30 - 17:00	3	4207	0.000	3	4207	0.135	3	4207	0.135
17:00 - 17:30	3	4207	0.000	3	4207	0.222	3	4207	0.222
17:30 - 18:00	3	4207	0.008	3	4207	0.158	3	4207	0.166
18:00 - 18:30	3	4207	0.000	3	4207	0.095	3	4207	0.095
18:30 - 19:00	3	4207	0.000	3	4207	0.032	3	4207	0.032
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			2.053			1.854			3.907

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP \times FACT$ . Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

# **MULTI-MODAL TOTAL RAIL PASSENGERS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
07:30 - 08:00	3	4207	0.103	3	4207	0.000	3	4207	0.103
08:00 - 08:30	3	4207	0.143	3	4207	0.000	3	4207	0.143
08:30 - 09:00	3	4207	0.317	3	4207	0.000	3	4207	0.317
09:00 - 09:30	<b>3</b>	<b>4207</b>	<b>0.499</b>	3	4207	0.016	<b>3</b>	<b>4207</b>	<b>0.515</b>
09:30 - 10:00	3	4207	0.254	3	4207	0.000	3	4207	0.254
10:00 - 10:30	3	4207	0.079	3	4207	0.016	3	4207	0.095
10:30 - 11:00	3	4207	0.103	3	4207	0.048	3	4207	0.151
11:00 - 11:30	3	4207	0.024	3	4207	0.016	3	4207	0.040
11:30 - 12:00	3	4207	0.024	3	4207	0.063	3	4207	0.087
12:00 - 12:30	3	4207	0.048	3	4207	0.048	3	4207	0.096
12:30 - 13:00	3	4207	0.024	3	4207	0.048	3	4207	0.072
13:00 - 13:30	3	4207	0.032	3	4207	0.016	3	4207	0.048
13:30 - 14:00	3	4207	0.055	3	4207	0.024	3	4207	0.079
14:00 - 14:30	3	4207	0.008	3	4207	0.079	3	4207	0.087
14:30 - 15:00	3	4207	0.008	3	4207	0.040	3	4207	0.048
15:00 - 15:30	3	4207	0.008	3	4207	0.024	3	4207	0.032
15:30 - 16:00	3	4207	0.071	3	4207	0.055	3	4207	0.126
16:00 - 16:30	3	4207	0.016	3	4207	0.166	3	4207	0.182
16:30 - 17:00	3	4207	0.071	3	4207	0.151	3	4207	0.222
17:00 - 17:30	3	4207	0.008	<b>3</b>	<b>4207</b>	<b>0.364</b>	3	4207	0.372
17:30 - 18:00	3	4207	0.000	3	4207	0.254	3	4207	0.254
18:00 - 18:30	3	4207	0.016	3	4207	0.174	3	4207	0.190
18:30 - 19:00	3	4207	0.008	3	4207	0.079	3	4207	0.087
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			1.919			1.681			3.600

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\* FACT. Trip rates are then rounded to 3 decimal places.

### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

# **MULTI-MODAL COACH PASSENGERS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
07:30 - 08:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
08:00 - 08:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
08:30 - 09:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
09:00 - 09:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
09:30 - 10:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
10:00 - 10:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
10:30 - 11:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
11:00 - 11:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
11:30 - 12:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
12:00 - 12:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
12:30 - 13:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
13:00 - 13:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
13:30 - 14:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:00 - 14:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
14:30 - 15:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
15:00 - 15:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
15:30 - 16:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
16:00 - 16:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
16:30 - 17:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
17:00 - 17:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
17:30 - 18:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
18:00 - 18:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
18:30 - 19:00	3	4207	0.000	3	4207	0.000	3	4207	0.000
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			0.000			0.000			0.000

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### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

# **MULTI-MODAL PUBLIC TRANSPORT USERS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.000	3	4207	0.000	3	4207	0.000
07:30 - 08:00	3	4207	0.119	3	4207	0.000	3	4207	0.119
08:00 - 08:30	3	4207	0.214	3	4207	0.008	3	4207	0.222
08:30 - 09:00	3	4207	0.563	3	4207	0.000	3	4207	0.563
09:00 - 09:30	<b>3</b>	<b>4207</b>	<b>0.753</b>	3	4207	0.032	<b>3</b>	<b>4207</b>	<b>0.785</b>
09:30 - 10:00	3	4207	0.467	3	4207	0.008	3	4207	0.475
10:00 - 10:30	3	4207	0.269	3	4207	0.079	3	4207	0.348
10:30 - 11:00	3	4207	0.277	3	4207	0.087	3	4207	0.364
11:00 - 11:30	3	4207	0.095	3	4207	0.079	3	4207	0.174
11:30 - 12:00	3	4207	0.119	3	4207	0.111	3	4207	0.230
12:00 - 12:30	3	4207	0.111	3	4207	0.158	3	4207	0.269
12:30 - 13:00	3	4207	0.071	3	4207	0.127	3	4207	0.198
13:00 - 13:30	3	4207	0.158	3	4207	0.135	3	4207	0.293
13:30 - 14:00	3	4207	0.143	3	4207	0.103	3	4207	0.246
14:00 - 14:30	3	4207	0.103	3	4207	0.151	3	4207	0.254
14:30 - 15:00	3	4207	0.135	3	4207	0.158	3	4207	0.293
15:00 - 15:30	3	4207	0.079	3	4207	0.095	3	4207	0.174
15:30 - 16:00	3	4207	0.119	3	4207	0.135	3	4207	0.254
16:00 - 16:30	3	4207	0.063	3	4207	0.404	3	4207	0.467
16:30 - 17:00	3	4207	0.071	3	4207	0.285	3	4207	0.356
17:00 - 17:30	3	4207	0.008	<b>3</b>	<b>4207</b>	<b>0.586</b>	3	4207	0.594
17:30 - 18:00	3	4207	0.008	3	4207	0.412	3	4207	0.420
18:00 - 18:30	3	4207	0.016	3	4207	0.269	3	4207	0.285
18:30 - 19:00	3	4207	0.008	3	4207	0.111	3	4207	0.119
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:	3.969			3.533			7.502		

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### Parameter summary

Trip rate parameter range selected:	2371 - 5500 (units: sqm)
Survey date date range:	01/01/08 - 19/05/15
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	2

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TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

# **MULTI-MODAL TOTAL PEOPLE**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	3	4207	0.071	3	4207	0.032	3	4207	0.103
07:30 - 08:00	3	4207	0.428	3	4207	0.040	3	4207	0.468
08:00 - 08:30	3	4207	0.594	3	4207	0.087	3	4207	0.681
08:30 - 09:00	3	4207	1.030	3	4207	0.095	3	4207	1.125
09:00 - 09:30	<b>3</b>	<b>4207</b>	<b>1.315</b>	3	4207	0.214	3	4207	1.529
09:30 - 10:00	3	4207	1.093	3	4207	0.238	3	4207	1.331
10:00 - 10:30	3	4207	0.800	3	4207	0.325	3	4207	1.125
10:30 - 11:00	3	4207	0.650	3	4207	0.467	3	4207	1.117
11:00 - 11:30	3	4207	0.467	3	4207	0.404	3	4207	0.871
11:30 - 12:00	3	4207	0.372	3	4207	0.396	3	4207	0.768
12:00 - 12:30	3	4207	0.650	3	4207	1.133	3	4207	1.783
12:30 - 13:00	3	4207	0.658	3	4207	0.959	3	4207	1.617
13:00 - 13:30	3	4207	0.872	3	4207	0.982	<b>3</b>	<b>4207</b>	<b>1.854</b>
13:30 - 14:00	3	4207	0.879	3	4207	0.507	3	4207	1.386
14:00 - 14:30	3	4207	0.840	3	4207	0.547	3	4207	1.387
14:30 - 15:00	3	4207	0.634	3	4207	0.349	3	4207	0.983
15:00 - 15:30	3	4207	0.396	3	4207	0.460	3	4207	0.856
15:30 - 16:00	3	4207	0.618	3	4207	0.555	3	4207	1.173
16:00 - 16:30	3	4207	0.341	3	4207	0.769	3	4207	1.110
16:30 - 17:00	3	4207	0.333	3	4207	0.634	3	4207	0.967
17:00 - 17:30	3	4207	0.238	<b>3</b>	<b>4207</b>	<b>1.212</b>	3	4207	1.450
17:30 - 18:00	3	4207	0.095	3	4207	0.879	3	4207	0.974
18:00 - 18:30	3	4207	0.143	3	4207	0.618	3	4207	0.761
18:30 - 19:00	3	4207	0.063	3	4207	0.317	3	4207	0.380
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:	13.580			12.219			25.799		

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## 5 REPRESENTATIONS IN RESPONSE TO SITE ALLOCATIONS PLAN DPD



**Local Plan  
Site Allocations Plan – Pre-Publication stage**

**Consultation from 1 October to 12 November 2013**

**RESPONSE FORM**

The Council is inviting comments over a six week period on a draft of the Site Allocations Plan. The Site Allocations Plan is one of a series of documents which makes up the Borough's Local Plan.

The Site Allocations Plan will guide future change and development in the borough, taking forward the aims and approach of existing adopted Plans (the Core Strategy and Development Management Plan, which will remain in force). The Plan will propose new development sites to meet present and predicted future needs in the period up to 2030. It will be a statutory land use plan for the borough apart from the area covered by the Twickenham Area Action Plan. It will cover the future use(s) of key sites and will be used for the purposes of development management, superseding the saved proposal sites from the Unitary Development Plan 2005.

**How to respond**

Please read the Pre-Publication Site Allocations Plan, including any supporting material, and complete this response form. All the consultation documents, supporting information including this response form are available on our website:

**[www.richmond.gov.uk/site\\_allocations\\_dpd.htm](http://www.richmond.gov.uk/site_allocations_dpd.htm)**

**You can respond on the consultation documents in the following ways:**

- Online at **[www.richmond.gov.uk/site\\_allocations\\_dpd.htm](http://www.richmond.gov.uk/site_allocations_dpd.htm)**, where you can find a link to our online consultation portal and online representation form (you can also review the documents online);
- Email to **[Ldfconsultation@richmond.gov.uk](mailto:Ldfconsultation@richmond.gov.uk)** this response form (a PDF and Word version of the form can be found on the Council's website at [www.richmond.gov.uk/site\\_allocations\\_dpd.htm](http://www.richmond.gov.uk/site_allocations_dpd.htm)). In the form in 'Word' format you can type in your response and return it as an email attachment.
- Send the form to Policy and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ; or hand-deliver your completed form to the ground floor reception in the Civic Centre.

All responses must be received by 5pm on **12 November 2013**.

**This form has two parts:**

- Part A – Personal Details
- Part B – Your response



**Part A: Personal Details**

	1. Personal Details *	2. Agent's Details (if applicable)
Title		<b>Miss</b>
First name		<b>Alison</b>
Last name		<b>Mackay</b>
Job title (where relevant)		<b>Planner</b>
Organisation (where relevant)	<b>Greggs PLC</b>	<b>Colliers International</b>
Address		<b>50 George Street London W1U 7GA</b>
Postcode		<b>W1U 7GA</b>
Telephone		<b>0207 344 6806</b>
Fax		
E-mail address		<b>alison.mackay@colliers.com</b>

\*If an agent is appointed, please complete only the title, name and organisation boxes but complete the full contact details of the agent.

**Data protection**

Information provided in this form will be used fairly and lawfully and the Council will not knowingly do anything which may lead to a breach of the Data Protection Act 1998.

All responses will be held by the London Borough of Richmond upon Thames. They will be handled in accordance with the Data Protection Act 1998. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

For further details regarding your privacy please see the Council's information published at:  
[http://www.richmond.gov.uk/data\\_protection\\_and\\_freedom\\_of\\_information.htm](http://www.richmond.gov.uk/data_protection_and_freedom_of_information.htm)

## Part B: Your Response

### 3. To which parts of the Site Allocations Plan does your response relate to?

Please indicate the documents **and** the specific paragraph numbers, proposal site numbers and names, maps or tables you are commenting on.

Documents		Sections	
Site Allocations Plan	<input checked="" type="checkbox"/>	Page number(s)	<b>62-63</b>
		Paragraph number(s)	<b>3.4.7</b>
		Proposal site(s) number	<b>TW 11</b>
		Proposal site(s) name	<b>West Twickenham cluster</b>
		Maps	
		Tables	
Sustainability Appraisal Report	<input checked="" type="checkbox"/>	Page number(s)	<b>121-123</b>
		Paragraph number(s)	
Other (for example an omission or alternative approach)	<input checked="" type="checkbox"/>	<b>Omission of 'Designation of Key employment site' from proposal</b>	

### 4. Please give details below to set out your representation.

**Please make it very clear to which document, which part of the Plan and/or which proposal site your comments relate to by indicating site reference, site name and paragraph number.**

Colliers International, on behalf of our client Greggs PLC, are instructed to comment on the Site Allocations Plan Pre-Publication document. We wish to make representations specifically in relation to identified 'Proposed Site TW 11 West Twickenham cluster, Twickenham' in the consultation document.

Our client's ownership comprises a significant proportion of proposed allocation site TW11, comprising approximately 1.05 ha, as shown in the accompanying Location Plan. A bakery has operated from this site for a number of decades and the firm's operations have changed to an extent that the buildings are no longer meeting its operational needs. The site is also constrained by the local highway network with poor access to major trunk roads. Due to the poor access to the site which makes it unsuitable for modern commercial vehicles and the close proximity to high density residential development, which currently causes conflict with a 24 hour industrial operation, the redevelopment of the site for use as a new bakery is not viable. It is expected that the site will become available within the next 5 years.

Our client fully supports the allocation of their site and the wider area as a residential led mixed use development. This will help deliver the objectives of the Core Strategy, which seeks to deliver approximately 700-1100 housing units to the Twickenham area, as set out in CS 14. The Sustainability Appraisal Progress Report clearly emphasises the advantages for redeveloping the site which meets key objectives including the landscape, townscape and housing; highlighting that the site is in a very sustainable location with access to established services and nearby employment.

Whilst a large proportion of the designated area is within the ownership of our client it is our view that, given the multiple ownerships for the site and the evident access and amenity constraints, the designated area should be brought forward by way of a Development Brief. It is felt that this is particularly important given the non-residential use of the site is for 'start up and small scale hybrid business space and/or primary school' and a Development Brief would allow for a masterplanned approach to take into consideration the site-specific issues including the ability to recognise the need, transport and urban design.

Our client believes that such an approach will both minimise uncertainty and improve efficiency whereby improving the overall quality of development. Failure to consider this approach is likely to lead to piecemeal development which could negatively impact on the ability to utilise the deliverability of the full extent of the site.

The reference in the policy text to a 'Proposed Designation as key employment site' is misguided as the site is not suitable for continued employment purposes of a scale to constitute a key employment site. The most suitable use for the site is for a residential led mixed use scheme to include start up and small scale hybrid business space and/or primary school as highlighted in the remaining policy text. The area to be used for employment and/or primary school would more easily be determined through way of a Development Brief.

Please continue on a separate sheet / expand box if necessary

**5. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

In order to provide a deliverable allocation, our client considers the policy wording of the allocation text should be changed to the following:

**TW 11 West Twickenham cluster, Twickenham**

**Proposal**

**Residential led mixed use to include start up and small scale hybrid business space and/or primary school. Any proposed development will be delivered in line with a Development Brief which will be prepared for the site.**

Please continue on a separate sheet / expand box if necessary.

**Please note** your response should cover succinctly all the information, evidence and supporting information necessary to support / justify the response and the suggested change.

Following this consultation, the Council will consider and take account of the consultation responses received; where relevant, changes will be made to the Plan and/or supporting material. There will be a further opportunity to comment on the Council's final version of the Site Allocations Plan in 2014.

**6. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Site Allocations Plan and other Local Plan documents.**

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box, complete Part A of this form and return it to us as appropriate.

☐

Signature:



Date:

12/11/2013

## 6 INDICATIVE SCHEME: RESIDENTIAL-LED REDEVELOPMENT





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© Copyright  
Ayre Chamberlain Gaunt

Site Boundary

Unit Schedule

1 Bed	9 Units
2 Bed	54 Units
3 Bed	15 Units
4 Bed	18 Units
Commercial	2757 sq m
No. of units	96 Units
Density	401 HR/Ha

ACGARCHITECTS.CO.UK

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14a London Street  
Basingstoke  
Hampshire, RG21 7NU  
  
+44 (0)1256 411 450  
mail@acgarchitects.co.uk

AYRE  
CHAMBERLAIN  
GAUNT

REV	DATE	NOTES
A	25/2/16	Issue for pre-planning application

DRAWN BY	PROJECT	
RA	Gould Road Twickenham	
CHECKED BY	DRAWING TITLE	
GW	Proposed Site Plan	
JOB NO.		
216		
STATUS	DRAWING NO.	REV
PLN	216_PLN_100	A

DRAFT



## CONTACT DETAILS

Tel: 0207 935 4499

Dir: 0207 344 6632

[jonathan.manns@colliers.com](mailto:jonathan.manns@colliers.com)

Colliers International  
Planning  
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London  
W1U 7GA

All information, analysis and recommendations made for clients by Colliers International are made in good faith and represent Colliers International's professional judgement on the basis of information obtained from the client and elsewhere during the course of the assignment. However, since the achievement of recommendations, forecasts and valuations depends on factors outside Colliers International's control, no statement made by Colliers International may be deemed in any circumstances to be a representation, undertaking or warranty, and Colliers International cannot accept any liability should such statements prove to be inaccurate or based on incorrect premises. In particular, and without limiting the generality of the foregoing, any projections, financial and otherwise, in this report are intended only to illustrate particular points of argument and do not constitute forecasts of actual performance.



## Annex 2 Comments on the local plan site allocations from GLAAS

Site Name	Archaeological Risk	Likely requirements
SA 2 Platts Eyot	<ul style="list-style-type: none"> <li>Palaeoenvironmental interest</li> <li>Possibly focus of prehistoric activity</li> <li>May have isolated finds or wooden structures buried in the underlying deposits</li> </ul>	Pre-planning: Archaeological Desk Based Assessment (DBA) and Geoarchaeological Assessment/Evaluation
SA 5 Telephone Exchange, Teddington	<ul style="list-style-type: none"> <li>Possible potential for early/late medieval remains</li> </ul>	Pre-planning: DBA
SA 6 Teddington Delivery Office	<ul style="list-style-type: none"> <li>Possible potential for early/late medieval remains</li> <li>Existing building is also of some interest</li> </ul>	Pre-planning: DBA
SA 8 St Mary's University	<ul style="list-style-type: none"> <li>Potential for remains associated with the 18<sup>th</sup> century landscaped garden and house</li> <li>Prehistoric worked flint found to the north</li> <li>Some archaeological investigation previously carried out within the site which recorded a possible Roman ditch and 18<sup>th</sup>-century garden features</li> </ul>	Pre-planning: DBA
SA 9 Richmond upon Thames College	<ul style="list-style-type: none"> <li>Only southern part within a current APA</li> <li>Potential for Palaeo environmental remains</li> <li>Previous advice for the site has recommended an evaluation condition</li> </ul>	Post-planning: Evaluation condition
SA 12 Mereway Day Centre	<ul style="list-style-type: none"> <li>Potential for Palaeoenvironmental remains/deposits</li> </ul>	Pre-planning: DBA and Geoarchaeological Assessment
SA 14 Kneller Hall	<ul style="list-style-type: none"> <li>Potential for medieval settlement features</li> </ul>	Pre-planning: DBA and possibly an evaluation
SA 15 Ham Close	<ul style="list-style-type: none"> <li>Potential for prehistoric finds</li> <li>Potential for early/late medieval settlement remains</li> </ul>	Pre-planning: DBA and possibly an evaluation
SA 16 Cassel Hospital, Ham Common	<ul style="list-style-type: none"> <li>Potential for early/late medieval remains</li> <li>Historic maps show landscaped grounds associated with the late post-medieval Morgan House</li> </ul>	Pre-planning: DBA and possibly evaluation
SA 17 St Michael's Convent	<ul style="list-style-type: none"> <li>Only partially within an APA</li> <li>Potential for early/late medieval settlement remains</li> </ul>	Pre-planning: DBA

## Annex 2 Comments on the local plan site allocations from GLAAS

Site Name	Archaeological Risk	Likely requirements
SA 18 Ryde House	<ul style="list-style-type: none"> <li>Potential for medieval settlement remains</li> <li>Already a DBA for the site which shows that at least 4 phases of development have occurred within the site since the 19<sup>th</sup>-century which has resulted in substantial impact to archaeological survival. Current advice is for a condition for an archaeological watching brief</li> </ul>	Post-planning: Watching Brief condition
SA 19 Richmond Station	<ul style="list-style-type: none"> <li>Potential for remains associated with the historic settlement development of Richmond</li> <li>Existing building likely to have heavily impacted archaeological survival</li> </ul>	Pre-planning: DBA
SA 20 Friars Lane	<ul style="list-style-type: none"> <li>Very close to the site of Richmond Palace</li> <li>Evaluation in 2006 recorded dumping deposits and the remains of a 19<sup>th</sup>-century Brewery.</li> </ul>	Pre-planning: DBA
SA 22 Pools on the Park and Surroundings	<ul style="list-style-type: none"> <li>Within the historic Richmond deer park</li> <li>To the north of the historic settlement of Richmond</li> </ul>	Pre-planning: DBA
SA 23 Richmond Rugby and Richmond Athletic Ground	<ul style="list-style-type: none"> <li>Within the historic Richmond deer park</li> <li>To the north of the historic settlement of Richmond</li> </ul>	Pre-planning: DBA
SA 24 Stag Brewery	<ul style="list-style-type: none"> <li>Potential for remains of a historic manor house</li> <li>Numerous finds have been recorded from the Thames</li> </ul>	Pre-planning: DBA and possibly evaluation
SA 25 Mortlake and Barnes Delivery Office	<ul style="list-style-type: none"> <li>Within an APA although archaeological potential is uncertain</li> </ul>	Pre-planning: DBA
SA 26 Kew Biothane Plant	<ul style="list-style-type: none"> <li>Potential for Palaeoenvironmental remains along the Thames foreshore</li> </ul>	Pre-planning: DBA and Geoarchaeological Assessment
Appendix 6: National Physical Lab.	<ul style="list-style-type: none"> <li>Only southern part within an APA</li> <li>Recent advice on the site has been for an archaeological condition for evaluation</li> </ul>	Post-planning: Evaluation condition
Appendix 6: Teddington Business Park	<ul style="list-style-type: none"> <li>Potential for early/late medieval settlement remains</li> <li>Prehistoric and medieval finds recorded to the east along with a possible site for an historic manor house</li> </ul>	Pre-planning: DBA and possibly evaluation
Appendix 6: West Twickenham Cluster	<ul style="list-style-type: none"> <li>Only partially within an APA</li> <li>Potential for palaeoenvironmental remains</li> </ul>	Pre-planning: DBA and Geoarchaeological Assessment

## Annex 2 Comments on the local plan site allocations from GLAAS

Site Name	Archaeological Risk	Likely requirements
Appendix 6: Heathland Industrial Estate	<ul style="list-style-type: none"> <li>Only partially within an APA</li> <li>Potential for early/late medieval settlement remains</li> </ul>	Pre-planning: DBA
Appendix 6: St George's Industrial Estate	<ul style="list-style-type: none"> <li>Potential for early/late medieval settlement remains</li> </ul>	Pre-planning: DBA and possibly evaluation
Appendix 6: Mererway Road Industrial Estate	<ul style="list-style-type: none"> <li>Potential for early/late medieval settlement remains</li> <li>Potential for Palaeoenvironmental remains</li> </ul>	Pre-planning: DBA and Geoarchaeological Assessment
Appendix 6: Swan Island Industrial Estate	<ul style="list-style-type: none"> <li>Potential for palaeoenvironmental remains</li> </ul>	Pre-planning: DBA and Geoarchaeological Assessment
Appendix 6: Electroline House and surrounds	<ul style="list-style-type: none"> <li>Southern part within an APA</li> <li>Potential for early/late medieval settlement remains</li> </ul>	Pre-planning: DBA
Appendix 6: Twickenham Film Studios and Arlington Works	<ul style="list-style-type: none"> <li>Not within an APA but existing buildings could be of historical and cultural interest</li> </ul>	Post-planning: Historic Building recording condition



## Report

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# The Lady Eleanor Holles School

## Representations to the pre- publication Local Plan

Supporting Statement

August 2016

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**For and on behalf of GVA Grimley Limited**

# 1. Introduction

- 1.1 The Lady Eleanor Holles School (LEHS) is an independent school located on Hanworth Road, Hampton. It provides education to girls aged 7-18 years, spread across a Junior Department (around 180 pupils) and Senior Department (around 680 pupils). The school does not currently offer school places to younger children (aged 4-7 years).
- 1.2 The School Governors wish to expand the school in order to meet current (and projected future) unmet local demand for additional school places for this age group (referred to as 'pre-prep'). The preliminary expansion plans comprise the development of a new pre-prep facility at the Hanworth Road site, to provide teaching accommodation for 2-forms of entry across 3 year groups (total 120 pupils).
- 1.3 The current MOL designation across the majority of the site provides a policy conflict with the need to meet education needs. The purpose of this paper is to set out the planning case in support of the principle of expanding the school, and to demonstrate that exceptional circumstances exist which should be considered as part of the local plan process to proactively plan for the identified education need. The paper reviews the potential development options for expanding the school from a planning perspective. It concludes that the school is currently unable to provide a new pre-prep facility within the existing parts of the site which are excluded from the MOL. The intention is that this paper will inform representations to the emerging Local Plan to allow the LB Richmond to take forward a planned approach in planning for growth in advance of any early pre-application discussions with the Local Planning Authority and the preparation of detailed plans.
- 1.4 This paper was originally prepared in June 2013, and subsequently updated in November 2013 for the purpose of discussion with the Local Planning Authority (LPA). This update (August 2016) has been prepared for the purposes of making representations to the draft Local Plan (Pre-Publication Version) and follows our previous representations submitted in January 2016 to the scoping consultation.
- 1.5 It is structured as follows:
- **Section 2** describes the site;
  - **Section 3** outlines the proposed development and sets out the education case;
  - **Section 4** provides an overview of the relevant planning context;
  - **Section 5** considers the principle of the development and the key planning issues;
  - **Section 6** evaluates alternative development options; and
  - **Section 7** concludes the evaluation and sets out next steps.

## 2. The Site

### Location

- 2.1 The site is located in the south west of the London Borough of Richmond-upon-Thames (LBRUT) in Hampton North ward. The site is approximately 4km to the south east of Feltham, 2.5km to the west of Teddington and 4km to the south west of Twickenham.

### Description

- 2.2 The site comprises c.9.87 hectares. It is broadly defined by the brook/stream (Longford River) to the north; the rear boundaries of residential properties on Uxbridge Road/Roy Grove to the east; Hanworth Road to the south; and the boundary with Hampton School to the west. An aerial photograph and red line boundary plan are enclosed at Appendix 1/2. A plan illustrating the existing site features is provided at Appendix 3. However, it should be noted that the school is currently preparing to implement the recent Student Gateway planning permission, which will expand its existing facilities. This is explained further below.

### Existing Development

- 2.3 The main Senior Department school buildings are located in the south central part of the site, fronting Hanworth Road. The main school buildings are between two and three storeys in height centred around small courtyard formations. The Arts Centre is located to the east of these buildings and comprises a theatre, music department and art department.
- 2.4 To the north and northwest of the main school buildings, a new Student Gateway is currently under construction. The project comprises new changing and locker facilities, up to five new build classrooms, and improved sports staff offices, Activity Studio and pool viewing area.
- 2.5 The Junior Department is located in the north western corner of the site (which includes a separate vehicular access point onto Uxbridge Road). The main Junior Department building comprises three storeys, which is supplemented by a one/two storey rear addition. The Junior Department buildings are surrounded by lawned areas which are connected to outdoor playing facilities and the rest of the school site via a pedestrian bridge over the Longford River.
- 2.6 A Caretaker's 'compound' is located in the south western corner of the site. This accommodates a number of single and 2-storey structures used to store equipment, machinery and materials for the maintenance of the school. Within this area there is also an



electricity sub-station, Facilities' team workshops, as well as areas of land used for the storage of miscellaneous furniture, waste and school vehicles.

- 2.7 The site also accommodates six dwellings at 131, 133 and 135 Uxbridge Road (north east corner of site); 113 Uxbridge Road (Rectory Lodge) (east of site); and at 50 and 102 Hanworth Road (south of site). Each of these units benefits from separate vehicular access onto Uxbridge/Hanworth Road. The dwellings are occupied by school staff.
- 2.8 The site does not include any Listed Buildings and is not located within a Conservation Area. However, there are some listed buildings within the vicinity of the site, detailed further in the sections below. The site falls within Environment Agency Flood Risk Zone 1 (low risk).

## Landscape

- 2.9 The site is relatively flat. Formal landscaped (lawned) amenity areas and tennis courts/croquet law (playing fields) are provided to the front (south) of the main Senior Department school buildings facing Hanworth Road. The remainder of the site comprises mainly playing fields with incidental areas of amenity space/landscaping, playgrounds and sports courts. The site accommodates a number of trees, however these are mainly confined to the site boundaries.

## Access Arrangements

- 2.10 Vehicular and pedestrian access arrangements comprise three main access/egress points onto Hanworth Road and a separate access/egress point onto Uxbridge Road for the Junior Department. These are supplemented by three secondary access/egress points onto Uxbridge/Hanworth Road.
- 2.11 The main school car/coach park lies to the south of the main Senior Department buildings. This is supplemented by further staff and visitor parking around the Junior Department buildings.
- 2.12 Parent/carer pick-up/drop-off is on-street.
- 2.13 The site benefits from a PTAL (Public Transport Accessibility Level) rating of 2 (poor). Numerous bus services operate along Uxbridge and Hanworth Roads.

## Neighbouring Development

- 2.14 Directly to the south of the site, a row of two storey detached residential properties face the school. Beyond these properties is a predominantly residential area. To the north of the site, beyond Longford River, there are residential properties of between two and three storeys in height which front on to Uxbridge Road.

- 2.15 To the east of the site, the neighbouring development on Uxbridge Road comprises two to three storey residential properties including ex-local authority housing blocks and detached properties. To the west of the LEHS site is Hampton School (buildings and playing fields), and beyond this is Hampton Academy.

## Physical and Environmental Considerations

- Topography – The site is broadly flat.
- Protected Species – We are not aware of any protected species present on the site (survey work will be necessary in order to confirm this).
- Underground Utilities – The site is expected to be constrained by the presence of underground utilities infrastructure (details to be confirmed following survey work).
- Flood Risk – The site falls within Environment Agency Flood Risk Zone 1 (low risk).
- Geo-environmental – We are not aware of any ground contamination issues.
- Trees – A number of trees are present on the site. These offer amenity value but are not expected to pose a significant constraint to development.
- Noise – The school use is a noise generator and the site is located in a noise sensitive (predominantly residential) setting.

## Planning Unit and Existing Lawful Use

- 2.16 We consider the site (as outlined on the plan at Appendix 1, including the Junior Department, Senior Department, and residential accommodation/dwellings) to function as a single planning unit at present. We consider the existing lawful use to be D1 (non-residential institution) (the staff residential accommodation is ancillary to this principal use).
- 2.17 Notwithstanding this, the dwellings are arguably capable of functioning as separate planning units, which is relevant to their future planning potential for alternative uses.

## 3. The Proposed Development

### The Requirement

- 3.1 The development requirement is to provide a pre-prep facility with capacity for 2 forms of entry across 3 year groups (Reception, Year 1 and Year 2. This equates to 6 classes and 120 pupils). The Governors consider this to be the most appropriate solution having regard to anticipated levels of demand and in response to operational considerations.

- 3.2 Scott Brownrigg Architects have identified the preliminary development specification, which has been principally informed by Building Bulletin 103 (Area guidelines for mainstream schools) (2014). The specification is as follows:
- 1126sqm gross internal floorspace (comprising classrooms and ancillary accommodation) spread over 2-storeys with a minimum building footprint of 770sqm. This should be located within the Hanworth Road site but comprise a discrete facility (complete disaggregation of the pre-prep facility from the school site would not be feasible on operational grounds). This is the minimum footprint configuration required for the teaching premises.
  - A total land-take of 4,880- 6,000sqm is required. This comprises the building footprint (770sqm), a hard informal social area (320sqm), a Multi-Use Games Area (730sqm), a Habitat Area (60sqm), associated circulation/amenity space and a car pick-up drop-off area (3,000sqm). With the exception of the car pick-up/drop-off area, the area requirements quoted above are a statutory requirement for primary school buildings (as set out in Building Bulletin 103 (June 2014) and based on an assumption of 120 pupils).
  - The 3,000sqm required for the parent/carer pick-up/drop-off facilities could be provided either adjacent to the building or within close walking distance. As noted above, complete disaggregation of the pre-prep facility from the main school site would not be feasible on operational grounds. However, this must take into account the safeguarding requirements of existing pupils and pre-prep pupils if the pick-up/drop-off facility is not directly adjacent to the site. Whilst it would be premature to provide a layout for this space, the land take requirement for this space has been informed by an initial review by qualified transport consultants, WSP.

## The Education Case

- 3.3 The current shortage of school places in London is well documented; the supporting text of London Plan (2016) Policy 3.18 states that London's population is younger than other places in England and Wales, and that by 2036 the London school age population is projected to increase by 18% (paragraph 3.102). Projected population and demographic changes suggest that need is likely to continue to grow over forthcoming years, placing increasing pressure on education providers in both the state and independent sectors.
- 3.4 According to the Independent Schools Council, over 7% of the total number of school children in England are educated in the independent sector.
- 3.5 The GLA's 'Projected Demand for School Places' report (November 2015) shows that, for London as a whole, demand for state-funded primary school places is projected to increase by 60,000 pupils (8.8%) over the decade to 2024/25, and demand for independent primary

school places is projected to increase by 10,000 (9.1%) by 2019/20 (if the proportion of children attending state and independent schools remains constant).

- 3.6 For secondary school places, the report shows that demand for state-funded places is projected to increase by 105,000 pupils (26.5%) over the decade to 2024/25, and demand for independent school places is projected to rise by 18,000 (24%) by 2024/25.
- 3.7 The data from the GLA report also shows net cross border flows for independent primary and secondary schools for 2014/15. For Hampton North Ward (of which Lady Eleanor Holles School is a part), there was a net inflow of both primary and secondary school pupils into the Ward. Schools in Hampton North Ward are therefore catering for demand at both a local and a more strategic level.
- 3.8 The above headline data clearly demonstrates that not only is the local school-aged population likely to continue growing, but that education providers in both the state and independent sectors must increase capacity in order to cater for this demand (noting that limited/nil growth of the independent sector will further increase pressure on state schools and/or increase the need for pupils to travel further afield for their education).
- 3.9 The LEHS Governors wish to respond proactively to this growing need by implementing plans to expand the school. They are aware of specific existing unmet demand for pre-prep school places (on the basis of parental inquiries), which they expect to continue to grow going forwards.
- 3.10 Logic dictates that policy makers and decision makers at all levels should encourage the growth of the best schools in order to not only increase quantitative provision of school places but also to improve the quality of education provision. The LEHS is a very successful school. In its most recent (2014) Inspection Report, the Independent Schools Inspectorate (ISI) judged that "at all ages, pupils' achievements are exceptional both in their academic work and in their activities". In 2015 80.1% of A Level results, 90.1% of AS Level results, and 96.1% of GCSE results were A or A\*. Clearly, the expansion in the number of 'outstanding' school places should be supported.

## Economic Benefits

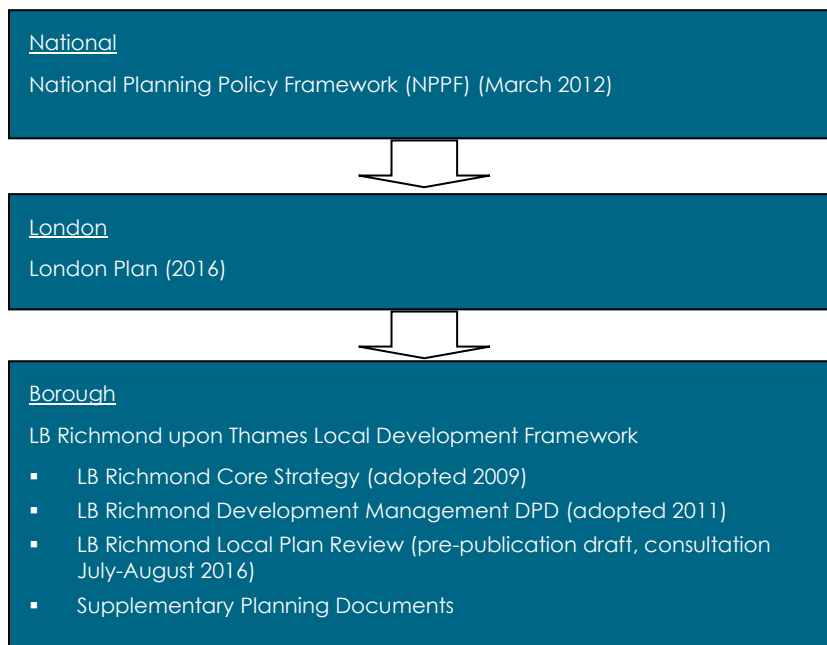
- 3.11 The proposed development will involve capital investment of around £3m, the generation of 40 FTE (full time equivalent) construction related jobs (calculated on the basis of industry-standard multipliers), and approximately 12 permanent teaching related jobs. Furthermore, the ability to access high quality education is a fundamental determinant of the life chances of London's children and their potential future economic output, ensuring that the scheme will contribute towards achieving short and longer term economic development objectives.



## 4. Planning Context

### The Development Plan

- 4.1 In accordance with s.38(6) of the Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. Accordingly, development plan and national planning policies are the starting point for establishing the potential feasibility of providing a new pre-prep facility at LEHS.
- 4.2 The planning policy framework for the site is outlined below:



### National Planning Policy Framework

- 4.3 The NPPF is a material consideration in the determination of planning applications. It sets out the Government's planning policies for England and how they are to be applied. The core message of the NPPF is a '*presumption in favour of sustainable development*'.
- 4.4 The NPPF supports a plan-led approach and places great emphasis on the need for Authorities to have up to date plans in place. Development proposals that accord with an up to date development plan should be approved without delay. Where the development plan is absent, silent, or out-of-date, the default position is for permission to be granted, unless any

adverse impacts of granting permission would significantly and demonstrably outweigh the benefits or where specific NPPF policies indicate that development should be restricted.

- 4.5 From March 2013 onwards, the NPPF requires that due weight should be given to relevant policies in adopted plans according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the framework, the greater the weight they should be given). Limited weight may also be afforded to emerging planning policies according to their stage of preparation and consistency with NPPF policies.

### London Plan (2016)

- 4.6 The London Plan (2016) forms part of the statutory development plan affecting the site. Key policies in the London Plan of relevance to the site/proposed development are Policies 3.18 (Education Facilities), 7.17 (Metropolitan Open Land), and 3.19 (Playing Fields). The Plan includes a raft of further development management type policies that are relevant to the preparation/determination of a planning application for the site.

### Richmond-upon-Thames Local Plan

- 4.7 The LBRUT Local Plan comprises the Core Strategy (2009) and Development Management Plan (2011). Both were adopted prior to the publication of the NPPF, therefore weight should be given to their policies according to their degree of consistency with the NPPF.

- 4.8 The site is not allocated for development in the Local Plan, nonetheless is affected by the following policy designations (refer to extract from the Core Strategy Proposals Map (2011) at Appendix 4:

- Metropolitan Open Land (MOL): The site is designated as MOL with the exception of an envelope of land around the existing main Senior Department school buildings, the Junior Department buildings and Rectory Lodge (113 Uxbridge Road). We note that much of this land also meets the statutory definition of playing fields. Core Strategy Policy CP10 and Development Management Policy DMOS2 apply.
- An Area Poorly Provided with Public Open Space: This designation extends from the new Student Gateway building northwards, covering the hard surface tennis courts, the junior play area and the junior school site.
- Other Site of Nature Importance: The length of the Longford River is allocated as an Other Site of Nature Importance.

- 4.9 Policy designations surrounding the site are also relevant for consideration, including:

- A Conservation Area is located to the east of the site, and directly south of Rectory Lodge.



- Primary Road: Uxbridge Road is identified as a Primary Road in the highways network.
- Proposed Area for Tree Planting: Hanworth Road is identified as an area proposed for Tree Planting.
- Listed Buildings: Two statutorily Grade II Listed buildings/monuments bound the LEHS site: 127 Uxbridge Road (adjacent to staff bungalows in north eastern corner); and the monument at south eastern end of General Roy's Survey Base (Roy Grove).

### Richmond-upon-Thames Local Plan Review

- 4.10 LB Richmond is undertaking a review of the existing policies contained in the Core Strategy (2009) and Development Management Plan (2011). The Local Plan review will also progress the work already undertaken to prepare the LB Richmond Site Allocations Plan which was subsequently abandoned in favour of a new Local Plan.
- 4.11 The Council has undertaken an initial consultation on the scope of the review of existing policies (4<sup>th</sup> January- 1<sup>st</sup> February) and is currently consulting on the pre-publication version of the Local Plan (8<sup>th</sup> July- 19<sup>th</sup> August 2016).
- 4.12 On behalf of LEHS, GVA responded to LB Richmond's initial consultation on the scope of the review of existing planning policies to recommend that the need for places at independent schools, as well as state-funded schools, is addressed. In the context of increasing pressure on school places and the policy support (at all levels) for the provision of education facilities, GVA's representations also requested a review of the Metropolitan Open Land boundary and the addition of an exception clause to Policy DM OS2 (MOL) for education uses where it can be demonstrated that there is a clear need for development.
- 4.13 The pre-publication version of the Local Plan includes the following draft policies, relevant to the site:
- Draft Policy LP29 (Education and Training)
  - Draft Policy LP13 (Metropolitan Open Land)
- 4.14 The following sections of this report provide further justification in support of our previous representations to this consultation.

### Planning History

- 4.15 The site has been subject to various planning applications over recent years, including minor applications for cycle storage, garages, temporary classrooms, children's play equipment and variation of conditions. The site has also been subject to a number of applications for extensions to provide additional teaching space, including classrooms and a sports hall.

Appendix 6 of this report provides a summary of the key planning applications related to the site.

- 4.16 The most significant recent planning applications are for the new arts centre, theatre and music facility (approved in 2010) and the Student Gateway Building, (approved in 2015). The new arts centre is complete and in use. LEHS are currently preparing to implement the planning permission for the Student Gateway Building.

Application Reference	Description	Decision (date)
08/1128/FUL	Erection of temporary classroom accommodation in the form of duplex 'portacabin' single storey structure for a five year period.	28 <sup>th</sup> May 2008
10/0227/FUL	New Arts Centre and new Theatre, new Music Department and new Art Department and general teaching rooms. Refurbishment of existing dining room and Drama Department. New secondary entrance area and public frontage. Demolition of the existing Art Department and VI Form common room building. Associated landscape works. New building to form extension to the school's existing building.	30 <sup>th</sup> April 2010
15/3128/FUL	Extension and works to existing buildings with associated landscaping works.	24 <sup>th</sup> September 2015
15/5139/FUL	Erection of temporary classroom accommodation in the form of a duplex 'portacabin' single storey structure for a temporary period of two years.	28 <sup>th</sup> January 2016
13/1693/VRC	Temporary planning consent for the portacabin is due to expire on 28 <sup>th</sup> May 2013. Lady Eleanor Holles School requires an extension of time limit for the temporary consent to allow the portacabin to be used as a classroom for an additional 3 years. – To alter the condition wording to allow the temporary portacabin use for a further 3 years we propose to vary condition U20968 to read: 'This permission be for a limited period of an additional 3 years only, beginning with the date of this permission, when the buildings and works carried out under this permission shall be removed and the land reinstated to its formed condition to the satisfaction of the Local Planning Authority'.	16 <sup>th</sup> July 2013
15/3128/NMA	Non-material amendment to planning approval 15/3128/NMA to allow for internal configuration to swimming changing rooms and access to existing pool remove existing internal stair; re-configure pupil toilets 1, 2 and 3; reconfigure design technology ancillary rooms and kitchenette area. External changes involve reconfigure doors to changing rooms and foyer to be moved/addition of ramps and step access to refurbished part of building. Addition of new steps/access to existing pool to match existing. Addition of plant related storage to west elevation. Fenestration changes to east and west facades. Addition of metal louvres to roof to screen plant. Changes to layout of hard landscape and car park area. Number of car parking spaces to remain as approved.	22 <sup>nd</sup> July 2016
16/3117/FUL	Installation of gate to an existing vehicular crossover.	In progress

## Comparables

- 4.17 We have included (at Appendix 7) details of recent planning applications where a Metropolitan Open Land designation was a key issue in order to highlight the principal relevant considerations in the interpretation of policy. Headline details are set out below:

### Applications in LBRUT for Educational Uses within or Adjacent to MOL

- 4.18 Appendix 7, Table 1 provides details of planning applications within LBRUT for additional educational facilities within or adjoining land allocated as MOL. The key messages from this review are that:

- Several planning applications for development of education floorspace on land adjacent to land designated as MOL have been approved; and
- Planning applications for development on land designated as MOL have been found to be acceptable by the LPA (and approved) where very special circumstances to justify an exception to the standard policy position can be demonstrated.

- 4.19 An application at Christ's School East was granted planning permission in 2013. Despite the site falling within MOL, the Council considered it most appropriate to extend the existing school, rather than provide wholly new sites to meet the identified education need (which would have a greater impact on the local community). In this instance, the whole of the school site is located within MOL, apart from a very tight boundary around the existing school building, and therefore it was not physically possible to locate the new building anywhere on the site other than in the MOL. The most discreet location, close to the existing built envelope was pursued by the applicant following discussions with the Council.

### Applications in LBRUT Considered as Exceptions to MOL Policy

- 4.20 Appendix 7, Table 2 sets out details of other applications where the Council has considered there to be an exception to MOL policy. These applications are generally of a small scale or supporting existing outdoor uses and therefore considered to be acceptable and without detrimental impact on the openness of the MOL.

### Comparable Appeal Decisions Regarding MOL

- 4.21 The application for a new sports hall at Harroddian School, which was appealed, was refused because the Council considered that the scale of the proposal was inappropriate and very special circumstances to justify the development had not been provided.
- 4.22 The appeal was dismissed on 20<sup>th</sup> September 2015. On balance the proposed location of the Sports Hall was not considered to outweigh the harm to the MOL. However, in recognising the

need for the development, the Inspector drew attention to whether there were alternative locations within the school grounds where the Sports Hall would have a more limited effect on the openness. It is noted that the Council had suggested an alternative location during the appeal, but this could not be considered at the time.

- 4.23 Following the appeal decision it is clear that the Council has proactively engaged with the Harrodian School in order to positively plan for growth to meet its needs through the proposed revisions to the MOL boundary which are identified as part of the current consultation on the Local Plan. It should be recognised that the LEHS shares the same site characteristics in that there is a cluster of buildings that can be clearly distinguished from the predominantly open character of the remainder of the site. Whilst there is an envelope of land excluded from the MOL, the following sections of this report demonstrate that the school cannot accommodate the proposed development within these locations. Therefore, proactive engagement is sought with the Council to discuss a revision to the MOL boundary, following good planning practise to plan for future need through the development plan.
- 4.24 Outside of the borough, the most comparable (pre-NPPF) appeal decision is for St Dominic's Sixth Form College in Harrow (appeal ref APP/M5450/A/03/1117712), which sought consent for a new education block, detached from the existing college buildings. Part of the college site was designated as MOL, and the proposed block was located close to the edge of the MOL. In assessing the impact of the proposed development on the openness of the MOL, the Inspector considered that 'such an assessment should be made in the context of the whole area of MOL within the College's grounds. In this case, the relevant area is extensive...this would affect only a small fraction of the entire boundary of MOL within the site'. In addition the existing college buildings were considered to provide a built up backdrops to views from the MOL over the intended site of new building.

## 5. The Principle of Development and Key Planning Issues

### The Principal Matter

- 5.1 The principal planning matter (which outweighs all other matters) is the Government's presumption in favour of sustainable development established in the NPPF, which includes specific support for new schools (at paragraph 72):

The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- give great weight to the need to create, expand or alter schools; and
- work with schools promoters to identify and resolve key planning issues before applications are submitted

- 5.2 The NPPF position is reflected in London Plan Policy 3.18 which supports the provision of new education facilities and improved education choice, in particular proposals that address the current projected shortage of primary school places which *'will be particularly encouraged'*. The policy advises that *'proposals for new schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations'*.
- 5.3 This positive/supportive policy position is carried forward at the local level, specifically in the borough's Core Strategy (Policy CP18) which seeks to maximise the potential of existing education sites. The borough's emerging Local Plan further embraces the supportive policy position (Policy LP29) and encourages the provision of education facilities and services for all age groups. It recognises the contribution that the independent sector makes to education provision and the LEHS support this positive emerging change.
- 5.4 Clearly, the principle of the development is acceptable in planning terms. Determining whether a proposal is fully acceptable in planning terms will be subject to demonstrating that there is no harm (impacts) that substantially outweighs the benefits of creating additional school places.

### Further Relevant Matters

#### Land Use

- 5.5 The proposals do not constitute a change of use, therefore there are no land use issues.

### Metropolitan Open Land (MOL)

- 5.6 The majority of the LEHS site is designated as MOL, excluding an envelope of land around the existing main school buildings, the junior school site and Rectory Lodge (113 Uxbridge Road).
- 5.7 The Metropolitan Open Land designation is established in the London Plan. Policy 7.17 requires planning authorities to protect land designated as MOL from inappropriate development other than in exceptional circumstances (affording such land the same level of protection as Green Belt). Appropriate development is defined as small scale structures to support outdoor open space uses that avoid adverse impacts on the openness of the MOL, and/or the replacement of existing buildings provided the new building is not materially larger than the one it replaces (all other development is 'inappropriate').
- 5.8 At the local level, the LBRUT Local Plan adopts a consistent policy stance to the London Plan. Core Strategy Policy CP10 states that the LPA will protect and enhance the open environment, with Metropolitan Open Land 'safeguarded and improved for biodiversity, sport, recreation and heritage, and for visual reasons'. Policy DMOS2 provides further detail, specifically in respect to MOL, stating that the LPA recognises that there may be exceptional cases where appropriate development, such as small scale structures is acceptable, but only if:
- It does not harm the character and openness of the MOL; and
  - It is linked to the functional use of the MOL or supports outdoor open space uses; or
  - It is for essential utility infrastructure and facilities, for which it needs to be demonstrated that no alternative locations are available and that they do not have any adverse impacts on the character and openness of the MOL.
- 5.9 Policy DMS02 also seeks to protect the openness of MOL from impacts associated with development on adjacent land.
- 5.10 Emerging Local Plan Policy LP13 also seeks to protect and retain Metropolitan Open Land in predominantly open use. Paragraph 5.2.6 acknowledges that it may be acceptable to re-distribute the designated open land within a site, where a comprehensive approach can be taken).
- 5.11 Whilst we recognise that the proposed policy is consistent with the London Plan, the emerging protectionist policies should be considered in the context of the firmly pro-development policies relating to education facilities discussed above, which gives rise to a strategic policy conflict. There is clear planning policy support for the provision of additional school accommodation, however, the majority of undeveloped land within school sites in LBRUT and

much of London (onto which schools could logically physically expand) is protected from development by MOL designation. This places a significant constraint on the potential to develop new school accommodation and the ability to implement policies relating to this.

- 5.12 It is our view that there is a logical in-principle strategic planning case to justify the release of MOL on school sites to accommodate new school buildings where need can be demonstrated and where it is evident that the development potential of land not designated as MOL has been optimised.
- 5.13 Accordingly, it is our view that a 'sequential' approach should be taken to this matter, with land not designated as MOL optimised in the first instance before developing on land designated as MOL. The exception to this would be the replacement of existing buildings within MOL which would also be acceptable (providing the new building would not have a greater adverse effect on the openness of the MOL than the building it replaces (by way of its scale/bulk/siting)). We have therefore undertaken a sequential site assessment which is detailed further in Section 6.

### Playing Fields

- 5.14 A large proportion of the site comprises land that meets the statutory definition of playing fields. This land is subject to policy protection from development under the provisions of the NPPF, London Plan (Policy 3.19), the LBRUT Local Plan, and the emerging Local Plan.
- 5.15 Relevant policies allow for the loss of playing fields (to make way for development) only where an assessment has been undertaken which has clearly shown that the playing field land is surplus to requirements or that the loss resulting from the proposed development would be replaced by equivalent, or better provision in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreational provision (the needs for which clearly outweigh the loss).

### Historic Assets

- 5.16 The site is adjacent to the Grade II Listed 127 Uxbridge Road. Development should avoid adversely affecting the setting of this building.

### Loss of Existing Housing

- 5.17 The site accommodates 6 dwellings that are occupied by school staff. One of the NPPF's core aims is to increase the supply of housing in the UK which is reflected in Development Plan policies that seek to resist the loss of housing (London Plan Policy 3.14). Accordingly, development on the site should seek to avoid the loss of the existing staff housing.



## Accessibility

### *Pedestrian and Cyclists*

- 5.18 At this stage it is assumed that the proposed development will be able to use existing pedestrian and cyclist access arrangements.

### *Public Transport*

- 5.19 The site benefits from a PTAL rating of 2. While it is some distance from the nearest rail station, the site is served by numerous bus routes in Uxbridge/Hanworth Road. These existing arrangements are considered adequate to support the proposed development.

### *Vehicle Access and Highway Safety*

- 5.20 There are numerous existing vehicle access/aggress points onto the site from Uxbridge/Hanworth Roads via which satisfactory vehicular access onto the site is currently achieved. At this stage it is assumed that vehicular access to the pre-prep facility will be via these existing provisions. The potential for an increase in vehicle movements using any of the access points would need to be informed by a highway safety assessment at the planning application stage. Effective site-wide travel planning can be used to ensure limited net change in trip rates. Consequently, at this stage we consider that existing access arrangements are capable of adequately supporting the development.

### *Traffic Impact*

- 5.21 The potential for a change in vehicle trip rates and patterns as an impact of the proposed development will need to be assessed at the planning application stage. As noted above, at this stage we consider that any impacts can be controlled through effective travel planning plus mitigation measures (as/if necessary) and therefore we do not consider this to be a significant constraint to development.

### *Parent/Carer Pick-up Drop off*

- 5.22 We are advised by the School that Hanworth Road currently suffers from car parking stress at the beginning and end of the school day, associated with parents/carers picking-up/dropping-off pupils. This has associated traffic congestion and pedestrian movement impacts. These conditions are typical of the majority of UK schools.
- 5.23 It is recognised that the proposed pre-prep facility risks worsening this situation. Potential impacts can be controlled by effective travel planning and mitigation measures (such as off-street pick-up/drop-off facilities). Therefore we do not consider it to be a barrier to development. Furthermore, an initial study has been undertaken to review the potential to improve the management of coach drop-off by bringing this on to the site as this is within LEHS

control. This would result in improved highways movements along Hanworth Road which would also be a material consideration

### Car Parking

- 5.24 No staff car parking is proposed (staff will have access to existing parking spaces).

### Neighbour Amenity (Potential for Nuisance)

- 5.25 The site is surrounded on three sides by residential properties. To the north and east residential properties back directly onto the LEHS site, whilst properties to the south of the site front on to Hanworth Road, which fronts the LEHS site. As such, the amenity of residential neighbours must be considered in the development of land for a new pre-prep facility.
- 5.26 Key considerations in the development of a suitable pre-prep facility scheme will be the need to ensure adequate levels of privacy are maintained and to avoid excessive noise impact. At this stage we assume that these matters can be dealt with via appropriate siting and design of the proposed development.

### Urban Design

- 5.27 Planning policies require that new development should be of the highest design standard based on sustainable design principles. Development is required to be inclusive, respect local character (including the nature of a particular road), and connect with, and contribute positively to, its surroundings (based on an understanding of site and site context).
- 5.28 Key design issues which will need to be adequately addressed through the design process for the pre-prep facility include:
- Compatibility with local character (including existing townscape, frontages, scale, height, massing, proportions and form);
  - Sustainable development and adaptability;
  - Layout and access;
  - Space between buildings and relationship to public realm; and
  - Detailing and materials.
- 5.29 The design and development of a pre-prep facility should also take into consideration the impact of the development on neighbouring Listed Buildings (127 Uxbridge Road and Monument at Roy Grove).

## Environmental/Technical

- 5.30 Key environmental constraints include the Longford River which runs along the northern boundary of the site, which is allocated as an 'other site of nature importance'. The LBRUT seeks to safeguard and enhance other sites of nature importance, and biodiversity enhancements will be safeguarded and enhanced, particularly along river corridors. Accordingly, development should ensure no adverse impacts on Longford River.
- 5.31 Development should not have an adverse impact on trees, in particular the old oak tree to the east of the main school buildings and any trees subject to a Tree Preservation Order. An Arboricultural Assessment should be undertaken where development of a pre-prep facility would impact on existing trees.
- 5.32 There are no known insurmountable environmental/technical constraints at this stage, nonetheless this will require testing as part of the detailed design stage.

## Summary of Key Planning Principles

- 5.33 The following bullet points summarise the key planning considerations that should drive the preparation of plans for the pre-prep facility (effectively a set of 'guiding principles'). These highlight a number of policy conflicts which will need to be dealt with through design and via negotiations with the Local Planning Authority.
- The principle of expanding the school is firmly supported by planning policy. A planning application should be approved unless there are demonstrable local impacts which substantially outweigh the desirability of establishing a new school.
  - Land not designated as MOL should be developed before land that is designated as MOL.
  - Existing playing fields should be protected from development.
  - The loss of existing staff housing should be resisted.
  - Vehicular access to be via existing arrangements in the first instance (the acceptability of any change to be subject to highway safety assessment). Additional vehicle trip-rates to be minimised via effective travel planning, with mitigation required if unavoidable. Nil/limited increases to on-site car parking. Parent/carers pick-up/drop-off facilities to be planned for as part of scheme development.
  - High quality design required that 'designs-out' the risks of neighbour amenity conflicts and ensures that development makes a positive contribution to local townscape value.
  - Development should avoid adversely affecting the setting of listed buildings.

## 6. Options Evaluation

- 6.1 As identified in Section 5, there is a current strategic policy conflict between protectionist MOL policy and firmly pro-development policies relating to education facilities. There is clear planning policy support for the provision of additional school accommodation; however, the majority of undeveloped land within school sites in LBRUT including LEHS (onto which schools could logically physically expand) is protected from development by MOL designation. This places a significant constraint on the potential to develop new school accommodation and the ability to implement policies relating to this.
- 6.2 It is our view that there is a logical in-principle strategic planning case to justify the release of MOL on school sites to accommodate new school buildings where need can be demonstrated and where it is evident that the development potential of land not designated as MOL has been optimised.
- 6.3 Accordingly, it is our view that a 'sequential' approach should be taken to this matter, with land not designated as MOL optimised in the first instance before developing on land designated as MOL.
- 6.4 Therefore, the purpose of this section is to identify potential locations for the pre-prep facility, and then to evaluate each option having regard to their suitability for the required development (see specification in Section 3) and their compatibility with the guiding planning principles outlined in Section 5.
- 6.5 Eight alternative sites have been identified (see Figures 6.1/6.2). A proforma has been completed for each site (as set out on the following pages) which includes a scoring mechanism (weighted in line with planning priorities) to enable the identification of a preferred option. The proformas should be read in conjunction with the feasibility plans prepared by Scott Brownrigg Architects (see Appendix 8).

Figure 6.1 Site Plan Showing Potential Locations for Pre-prep





Figure 6.2      Aerial Photograph Showing Potential Locations for Pre-prep



## Proforma of Sites

### Site 1 – Junior School Playground

Assessment Criteria	Comment	Score
<b>1. Suitability</b>		
i. Site Size	The existing playground areas extend to approximately 0.1ha. The site is capable of accommodating the required buildings and facilities on an area of approximately 3623sqm. However, it is not sufficient to accommodate on-site pick up/drop off facilities, and there is no existing within a suitable distance. As a result this would give rise to a safeguarding conflict. Therefore the site cannot be deemed suitable in terms of its size.	0/10
ii. Available for Development (existing use/function)	Yes, subject to re-provision of Junior School playground facility (essential).	5/10
iii. Physical/Technical Constraints	Flat site. Adjacent to River Longford (although identified as Flood Risk Zone 1). No known physical/technical constraints.	8/10
iv. Accessibility (pick-up/drop-off)	Good pedestrian/cycle access from Uxbridge Road via Junior School and Hanworth Road (via Senior School). Bus services operate along both roads (bus stops in close proximity to school entrance). Insufficient space to increase capacity of Junior School car pick-up/drop-off facilities to cater for pre-prep. Car pick-up/drop-off arrangements will need to be provided by 're-allocation' of existing on-site parking areas or provision of a new pick-up/drop-off facility or close to the pre-prep facility. There is no vehicle access to this location and it would not be possible to facilitate vehicle access without conflicting with safeguarding.	2/10
v. Relationship to Existing School Facilities	A pre-prep in this location would be capable of operating as a discrete facility. Interruption to senior school with provision of vehicle access through the site. Interruption to operation of Junior School due to replacement of playground.	4/10
vi. Alternative Use Potential	Our initial view is that the potential to secure planning consent for an alternative (higher value) use of this land is low.	10/10
<b>Suitability Score</b>		<b>29/60</b>
<b>2. Planning Considerations</b>		
i. Previously Developed Land	Approximately half of the land required is previously developed (playground only – not buildings), the remainder would take-up undeveloped land.	3/10
ii. Metropolitan Open Land	The entire site is designated as MOL. Development will lead to the loss of around 0.1ha of MOL and adversely affect openness. Provision of vehicle access link through the Senior Department site will increase MOL land take.	0/20
iii. Playing Fields	The entire site meets the statutory definition of playing fields. Development will lead to the loss of around 0.2ha. Provision of vehicle access link through the Senior Department site will increase playing field land take	0/10
iv. Access Arrangements (highway safety)	Vehicle access via existing access/egress arrangements (onto Hanworth Road) but no direct vehicle access to this site. Increases in vehicle movements/trip-rates to be controlled via Travel Plan and mitigated as necessary.	1/5
v. Loss of Residential Accommodation	None.	5/5
vi. Residential (neighbour) Amenity	The closest residential neighbours lie to the north of the River and extensive boundary vegetation. Possible amenity issues can be designed-out.	4/5
vii. Urban Design (townscape/landscape)	The site is not visible from outside of the school site. Appropriate design can ensure no harm to local townscape quality.	5/5
viii. Historic Assets	Development of this site will not affect the setting of any listed buildings.	5/5
ix. Environmental	Site is adjacent to land designated as 'other site of nature importance'. Environmental impacts can be controlled via appropriate design and conditions.	3/5
<b>Planning Score</b>		<b>26/75</b>
<b>Total Score</b>		<b>55/135</b>



## Site 2 – Staff Residential Accommodation (north)

Assessment Criteria	Comment	Score
<b>1. Suitability</b>		
i. Site Size	This is an existing defined plot, which extends to approximately 0.16ha. This is sufficient to accommodate the proposed building (assumed to comprise the demolition and replacement of the existing building). However, it is not sufficient to accommodate on-site pick up/drop off facilities, and there is no existing facility within a suitable distance. As a result this would give rise to a safeguarding conflict. Therefore the site cannot be deemed suitable in terms of its size.	0/10
ii. Available for Development (existing use/function)	Yes. The existing residential accommodation is currently occupied but can be vacated in order to make way for development. This accommodation would need to be replaced.	8/10
iii. Physical/Technical Constraints	Flat site. Adjacent to River Longford (although identified as Flood Risk Zone 3). No known physical/technical constraints.	8/10
iv. Accessibility (pick-up/drop-off)	Good pedestrian/cycle access from Uxbridge Road via existing access point (this could operate as a discrete pedestrian access point for the pre-prep facility separate from the school). Bus services operate along Hanworth and Uxbridge Roads (bus stops in close proximity to school entrance).  Parking controls on Uxbridge Road preclude ability to provide car pick-up/drop-off via on-street parking. Existing vehicular access is available from Uxbridge Road. However, this location is not sufficient to accommodate on-site pick up/drop off.  Car pick-up/drop-off arrangements will principally need to be provided by 're-allocation' of existing on-site parking areas via the existing access/egress point on Hanworth Road. However, this is not considered accessible from a safeguarding perspective.	4/10
v. Relationship to Existing School Facilities	A pre-prep in this location would be capable of operating as a discrete facility. Some interruption to Senior Department associated with provision of vehicle access through the site.	8/10
vi. Alternative Use Potential	Our initial view is that this site may offer planning potential for conversion/redevelopment for non-school related residential development (further investigation required in order to confirm potential and any key constraints). Redevelopment for education use would prevent this opportunity (and associated value) from being realised.	0/10
<b>Suitability Score</b>		38/60
<b>2. Planning Considerations</b>		
i. Previously Developed Land	The development can be accommodated on previously developed land (with appropriate design).	10/10
ii. Metropolitan Open Land	The entire site is designated as MOL. Existing buildings are single storey and occupy a footprint of approximately 150sqm. New development would increase (x4) the amount and bulk of development on the site. This will have an impact on the openness of the MOL, however the potential of this impact will be limited on account of the site's location at the edge of the MOL.	10/20
iii. Playing Fields	It would not be necessary for the building to sit on land that meets the statutory definition of playing fields. However, land that does meet the statutory definition of playing fields may be required for outdoor play purposes associated with the pre-prep facility.	10/10
iv. Access Arrangements (highway safety)	Vehicle access gained from Hanworth Road via existing driveway running across Senior School site. Increases in vehicle movements/trip-rates to be controlled via Travel Plan.  Existing vehicle access/aggress onto Uxbridge Road. Increased use of this subject to highway safety assessment and consideration of potential adverse effect on the setting of 127 Uxbridge Road (Grade II Listed). Potential assumed to be limited to restricted movements only.	5/5
v. Loss of Residential Accommodation	Loss of 3 residential units.	0/5
vi. Residential (neighbour) Amenity	Significant increase in pedestrian/vehicle movements in/out of Uxbridge Road access point likely to give rise to nuisance to residents of 127 Uxbridge Road (noise, vibration), nonetheless this can be controlled via appropriate design and use of conditions. Potential noise impacts on neighbours (associated with outdoor play) can be minimised through appropriate design.	3/5
vii. Urban Design	The site is not visible from outside of the school site. Appropriate design can	5/5

(townscape/landscape)	ensure no harm to local townscape quality.	
viii. Historic Assets	The site is adjacent 127 Uxbridge Road which is Grade II listed. Adverse impacts on the setting of this building (associated with works to the Uxbridge Road access point and the design of new buildings/outdoor spaces) can be controlled via appropriate design.	5/5
ix. Environmental	Site is adjacent to land designated as 'other site of nature importance'. Environmental impacts can be controlled via appropriate design and conditions.	3/5
Planning Score		51/75
<b>Total Score</b>		<b>89/135</b>

## Site 3 – Rectory Lodge

Assessment Criteria	Comment	Score
<b>1. Suitability</b>		
i. Site Size	This is an existing defined plot, which extends to approximately 0.2ha. This is sufficient to accommodate the proposed development on the basis that the existing building is demolished.	10/10
ii. Available for Development (existing use/function)	Yes. The existing residential accommodation is currently occupied but can be vacated in order to make way for development. This accommodation would need to be replaced.	8/10
iii. Physical/Technical Constraints	Flat site. No known physical constraints.	10/10
iv. Accessibility (pick-up/drop-off)	<p>Good pedestrian/cycle access from Uxbridge Road via existing access point (this could operate as a discrete pedestrian access point for the pre-prep facility separate from the school). Bus services operate along Hanworth and Uxbridge Roads (bus stops in close proximity to school entrance).</p> <p>Parking controls on Uxbridge Road preclude ability to provide car pick-up/drop-off via on-street parking. Some limited car pick-up/drop-off provision can be incorporated on-site via existing access/egress point onto Uxbridge Road. Potential to upgrade existing vehicle access/egress arrangements onto Uxbridge Road considered.</p> <p>Car pick-up/drop-off arrangements will principally need to be provided by 're-allocation' of existing on-site parking areas or provision of a new pick-up/drop-off facility adjacent to (or close to) the pre-prep facility, with vehicle access provided via a new link running through the Senior Department site from Hanworth Road.</p> <p>Potential opportunity for a pre-prep pick-up/drop-off 'loop' through existing site without compromising safeguarding.</p>	6/10
v. Relationship to Existing School Facilities	A pre-prep in this location would be capable of operating as a discrete facility. Some interruption to Senior Department associated with provision of vehicle access through the site.	8/10
vi. Alternative Use Potential	Our initial view is that this site may offer planning potential for conversion/redevelopment for non-school related residential development (further investigation required in order to confirm potential and any key constraints). Redevelopment for education use would prevent this opportunity (and associated value) from being realised.	0/10
<b>Suitability Score</b>		42/60
<b>2. Planning Considerations</b>		
i. Previously Developed Land	The development can be part accommodated on previously developed land.	5/10
ii. Metropolitan Open Land	The site is part designated as MOL. The site accommodates an existing 2-3 storey building and is partially screened from the MOL by mature vegetation. Appropriate design of new development on this site could ensure no adverse effect on the openness of the MOL.	10/20
iii. Playing Fields	Part of the site comprises land that meets the statutory definition of playing fields	5/10
iv. Access Arrangements (highway safety)	<p>Vehicle access gained from Hanworth Road via existing driveway running across Senior School site. Increases in vehicle movements/trip-rates to be controlled via Travel Plan.</p> <p>Existing vehicle pedestrian/cycle access/aggress onto Uxbridge Road. Increased use of this subject to highway safety assessment and consideration of potential adverse effect on neighbours. Potential assumed to be limited.</p>	5/5
v. Loss of Residential Accommodation	Potential loss of 1 residential unit.	2/5
vi. Residential (neighbour) Amenity	The site borders residential development on 3 sides. Significant increase in pedestrian/vehicle movements in/out of Uxbridge Road access point likely to give rise to nuisance to residents, nonetheless this can be controlled via appropriate design and use of conditions. Potential noise impacts on neighbours (associated with outdoor play) can be minimised through appropriate design.	3/5
vii. Urban Design (townscape/landscape)	The site is not visible from outside of the school site. Appropriate design can ensure no harm to local townscape quality.	5/5
viii. Historic Assets	Development of this site will not affect the setting of any listed buildings.	5/5

ix. Environmental	No known constraints	5/5
Planning Score		45/75
Total Score		87/135

## Site 4 (Staff Residential Accommodation (South East) and car park

Assessment Criteria	Comment	Score
<b>1. Suitability</b>		
i. Site Size	The site is sufficient to accommodate the proposed development (assumed to comprise the demolition of the existing building).	10/10
ii. Available for Development (existing use/function)	Yes. The existing residential accommodation is currently occupied but can be vacated in order to make way for development. There is no operational need for this to be replaced.	8/10
iii. Physical/Technical Constraints	Flat site. No known physical constraints.	10/10
iv. Accessibility (pick-up/drop-off)	<p>Good pedestrian/cycle access direct from Hanworth Road via existing access point (this could operate as a discrete pedestrian access point for the pre-prep facility separate from the school). Bus services operate along Hanworth Road bus stops in close proximity to school entrance).</p> <p>Car pick-up/drop-off arrangements will principally need to be provided by 're-allocation' of existing on-site parking areas or provision of a new pick-up/drop-off facility adjacent to (or close to) the pre-prep facility, with vehicle access provided via existing or a new/upgraded access/egress arrangement from Hanworth Road.</p> <p>Clear opportunity for a pre-prep pick-up/drop-off 'loop' through existing site without compromising safeguarding.</p>	8/10
v. Relationship to Existing School Facilities	A pre-prep in this location would be capable of operating as a discrete facility. Some interruption to Senior Department associated with provision of vehicle access through the site (if necessary).	10/10
vi. Alternative Use Potential	<p>Our initial view is that part of this site (Staff residential accommodation) may offer planning potential for conversion/redevelopment for non-school related residential development (further investigation required in order to confirm potential and any key constraints). Redevelopment for education use would prevent this opportunity (and associated value) from being realised.</p> <p>The potential to secure planning consent for an alternative (higher value) use on the remainder of the site is low.</p>	0/10
<b>Suitability Score</b>		44/60
<b>2. Planning Considerations</b>		
i. Previously Developed Land	The development can be accommodated on previously developed land (with appropriate design). It is noted that part of the site has been developed on a temporary basis only.	10/10
ii. Metropolitan Open Land	The entire site is designated as MOL. The existing building is single storey and occupies a footprint of approximately 100sqm. New development could have the potential to impact on the openness of the MOL, however this impact will be limited on account of the site's location at the edge of the MOL and in close proximity to the existing school buildings.	10/20
iii. Playing Fields	<p>Once the current temporary use of part of the site expires, the land will revert back to playing fields. Redevelopment will lead to the permanent loss of land that meets the statutory definition of playing fields.</p> <p>Part of the site (staff accommodation) does not meet the statutory definition of playing fields.</p>	5/10
iv. Access Arrangements (highway safety)	Vehicle access gained from Hanworth Road either via existing main (Senior) school provision or via new arrangements. Increases in vehicle movements/trip-rates to be controlled via Travel Plan.	5/5
v. Loss of Residential Accommodation	Loss of 1 residential unit.	2/5
vi. Residential (neighbour) Amenity	The site borders residential development on 2 sides. Potential noise impacts on neighbours (associated with outdoor play) can be minimised through appropriate design.	3/5
vii. Urban Design (townscape/landscape)	<p>Redevelopment offers the opportunity to replace a poor quality existing building with a much higher quality form of development, resulting in a net improvement to existing townscape quality.</p> <p>Development of this site will introduce buildings into a currently undeveloped frontage which is likely to detract from local townscape character.</p>	5/5
viii. Historic Assets	Development of this site will not affect the setting of any listed buildings.	5/5
ix. Environmental	No known constraints	5/5

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Planning Score	50/75
Total Score	94/135

## Site 5 – Caretakers Buildings

Assessment Criteria	Comment	Score
<b>1. Suitability</b>		
i. Site Size	Sufficient land to accommodate needs.	10/10
ii. Available for Development (existing use/function)	Yes. Loss of existing caretakers facilities (workshops and garages) will need to be demolished and replaced elsewhere on site. These could be re-provided on sites 2 or 4.	5/10
iii. Physical/Technical Constraints	Flat site. No known physical constraints.	10/10
iv. Accessibility (pick-up/drop-off)	<p>Good pedestrian/cycle access direct from Hanworth Road via existing access point (opportunity to provide a discrete pedestrian access point for the pre-prep facility separate from the school). Bus services operate along Hanworth Road bus stops in close proximity to school entrance).</p> <p>Car pick-up/drop-off arrangements will principally need to be provided on the school's forecourt adjacent to (or close to) the pre-prep facility, with vehicle access provided via existing or an upgraded access/egress arrangement from Hanworth Road. Clear opportunity for a pre-prep pick-up/drop-off 'loop' through existing site.</p> <p>The deliveries and facilities team entrance will need to be relocated to another location on Hanworth Road. Due to increased demand, there is potential for highway/traffic issues at the existing entrance if it is to be used for deliveries, facilities, and pre-prep traffic without upgrade.</p> <p>Access to the new Student Gateway building and for the emergency services would require further thought to ensure access is not comprised. Access to the substation would also require further thought to ensure it is not compromised.</p>	9/10
v. Relationship to Existing School Facilities	A pre-prep in this location could be capable of operating as a discrete facility. However, it will impact upon the setting of the new Student Gateway Building and Senior School reception and will result in interruption to existing sports facilities.	5/10
vi. Alternative Use Potential	Our initial view is that the potential to secure planning consent for an alternative (higher value) use of this land could be explored further given the existing buildings on site.	5/10
<b>Suitability Score</b>		44/60
<b>2. Planning Considerations</b>		
i. Previously Developed Land	Part of the development can be accommodated on previously developed land.	5/10
ii. Metropolitan Open Land	The entire site is designated as MOL. The existing buildings comprise a number of 1/2- storey buildings. New development could have an impact on the openness of the MOL, however the potential of this impact will be limited on account of the site's location at the edge of the MOL.	10/20
iii. Playing Fields	Part of the site comprises land that meets the statutory definition of playing fields.	5/10
iv. Access Arrangements (highway safety)	Vehicle access gained from Hanworth Road either via existing main (Senior) school provision. Increases in vehicle movements/trip-rates to be controlled via Travel Plan.	5/5
v. Loss of Residential Accommodation	Loss of residential accommodation on site. Furthermore the required re-provision of caretakers accommodation on sites 2/4 would result in an indirect loss of residential accommodation on these sites.	0/5
vi. Residential (neighbour) Amenity	The site does not adjoin dwellings. The closest homes are opposite Hanworth Road. A pre-prep facility in this location is not expected to significantly increase existing nuisance levels associated with the school.	5/5
vii. Urban Design (townscape/landscape)	Redevelopment offers the opportunity to replace existing poor quality existing buildings with a much higher quality form of development, resulting in a net improvement to existing townscape quality.	5/5
viii. Historic Assets	Development of this site will not affect the setting of any listed buildings.	5/5
ix. Environmental	No known constraints	5/5
<b>Planning Score</b>		45/75
<b>Total Score</b>		<b>89/135</b>



## Site 6 – Existing Car Park (west)

Assessment Criteria	Comment	Score
<b>1. Suitability</b>		
i. Site Size	The site is sufficient to accommodate the proposed building. However, it is not sufficient to accommodate on-site pick up/drop off facilities, and there is no existing car park facility within a suitable distance. As a result this would give rise to a safeguarding conflict. Therefore the site cannot be deemed suitable in terms of its size.	0/10
ii. Available for Development (existing use/function)	No. Loss of car parking will need to be replaced elsewhere on the site or managed as part of site wide car parking rationalisation programme. This is likely to cause significant operational difficulties for the school.	0/10
iii. Physical/Technical Constraints	Flat site. No known physical constraints.	10/10
iv. Accessibility (pick-up/drop-off)	Good pedestrian/cycle access direct from Hanworth Road via existing access point (no opportunity to provide a discrete pedestrian access point for the pre-prep facility separate from the school). Bus services operate along Hanworth Road bus stops in close proximity to school entrance).  Car pick-up/drop-off arrangements will principally need to be provided by 're-allocation' of existing on-site parking areas or provision of a new pick-up/drop-off facility adjacent to (or close to) the pre-prep facility, with vehicle access provided via existing or a new/upgraded access/egress arrangement from Hanworth Road. Clear opportunity for a pre-prep pick-up/drop-off 'loop' through existing site.	8/10
v. Relationship to Existing School Facilities	The site is located in the 'heart' of the Senior Department, and would compromise the operation of the school (conflicts with access, safeguarding and circulation space for the Student Gateway due to the secure fencing that would be required for safeguarding). The new building would also compromise daylight into the Student Gateway building and there would be a loss of setting to the Student Gateway.	0/10
vi. Alternative Use Potential	Our initial view is that the potential to secure planning consent for an alternative (higher value) use of this land is low.	10/10
<b>Suitability Score</b>		<b>28/60</b>
<b>2. Planning Considerations</b>		
i. Previously Developed Land	The development can be accommodated on previously developed land.	10/10
ii. Metropolitan Open Land	The site is not designated as MOL. It is located within a built up area of the site and therefore development on the site is unlikely to adversely affect the openness of the adjacent MOL. Whilst the building can be accommodated on the site, it would require other facilities to be provided on site 7 (which is in the MOL).	10/20
iii. Playing Fields	Part of the site comprises land that meets the statutory definition of playing fields. Whilst the building can be accommodated on the site, part of site 7 may be required to accommodate associated facilities.	5/10
iv. Access Arrangements (highway safety)	Vehicle access gained from Hanworth Road either via existing main (Senior) school provision or via new arrangements. Increases in vehicle movements/trip-rates to be controlled via Travel Plan.	5/5
v. Loss of Residential Accommodation	Nil	5/5
vi. Residential (neighbour) Amenity	The site is remote from residential homes	5/5
vii. Urban Design (townscape/landscape)	This is a constrained site that is largely screened from views from outside of the site. Development is unlikely to have a significant effect on local townscape character.	5/5
viii. Historic Assets	Development of this site will not affect the setting of any listed buildings.	5/5
ix. Environmental	No known constraints	5/5
<b>Planning Score</b>		<b>55/75</b>
<b>Total Score</b>		<b>83/135</b>

## Site 7 – Land to North of Senior School Buildings

Assessment Criteria	Comment	Score
<b>1. Suitability</b>		
i. Site Size	Sufficient land to accommodate the proposed building. However, the site is not sufficient to accommodate on-site pick up/drop off facilities, and there is no existing within a suitable distance. As a result this would give rise to a safeguarding conflict. Therefore the site cannot be deemed suitable in terms of its size.	0/10
ii. Available for Development (existing use/function)	There is a conflict with the pitches. The school cannot reduce the number of pitches and all the pitches are required to serve the senior school.	5/10
iii. Physical/Technical Constraints	Flat site. No known physical constraints.	10/10
iv. Accessibility (pick-up/drop-off)	<p>Located in centre of the site. Good pedestrian/cycle access direct from Hanworth Road and Uxbridge Road via existing access point (no opportunity to provide a discrete pedestrian access point for the pre-prep facility separate from the school). To gain access to the pre-prep facility, parents would need to walk within the school premises for more than 500m. This could cause safeguarding issues. Bus services operate along Hanworth/Uxbridge Road (bus stops in close proximity to school entrance).</p> <p>Car pick-up/drop-off arrangements will principally need to be provided by 're-allocation' of existing on-site parking areas or provision of a new pick-up/drop-off facility adjacent to (or close to) the pre-prep facility, with vehicle access provided via existing or a new/upgraded access/egress arrangement from Hanworth Road. Clear opportunity for a pre-prep pick-up/drop-off 'loop' to the south of the existing senior school buildings (reuse of existing infrastructure). Difficult to achieve pick-up/drop-off facilities in close proximity to this site without significant loss of playing fields and disruption to operation of the Senior Department.</p>	4/10
v. Relationship to Existing School Facilities	Development would take up 'courtyard' style space within the Senior School. This risks compromising the operation of the senior school (conflicts with access and circulation space). The courtyard space is currently used by the senior school as a social playground area as well as for summer sports, such as athletics, rounder and lacrosse practice. Access to the sports pitches from the senior school would be greatly reduced.	0/10
vi. Alternative Use Potential	Our initial view is that the potential to secure planning consent for an alternative (higher value) use of this land is low.	10/10
<b>Suitability Score</b>		<b>29/60</b>
<b>2. Planning Considerations</b>		
i. Previously Developed Land	No	0/10
ii. Metropolitan Open Land	No	20/20
iii. Playing Fields	Yes	0/10
iv. Access Arrangements (highway safety)	Vehicle access gained from Hanworth Road either via existing main (Senior) school provision. Increases in vehicle movements/trip-rates to be controlled via Travel Plan.	5/5
v. Loss of Residential Accommodation	Nil	5/5
vi. Residential (neighbour) Amenity	The site is remote from residential homes	5/5
vii. Urban Design (townscape/landscape)	This is a constrained site that is largely screened from views from outside of the site. Development is unlikely to have a significant effect on local townscape character.	5/5
viii. Historic Assets	Development of this site will not affect the setting of any listed buildings.	5/5
ix. Environmental	No known constraints	5/5
<b>Planning Score</b>		<b>50/75</b>
<b>Total Score</b>		<b>79/135</b>

## Site 8 – Senior School Playground

Assessment Criteria	Comment	Score
<b>1. Suitability</b>		
i. Site Size	Sufficient land to accommodate the proposed building. However, the site is not sufficient to accommodate the 60sqm Habitat Area (a statutory requirement under Building Bulletin 103. Therefore the site cannot be deemed suitable in terms of its size.	0/10
ii. Available for Development (existing use/function)	Can be made available (subject to re-provision of existing sports court facilities (re-provision is essential but there are no suitable alternative location elsewhere on site)).	2/10
iii. Physical/Technical Constraints	Flat site. No known physical/technical constraints.	10/10
iv. Accessibility (pick-up/drop-off)	Good pedestrian/cycle access from Uxbridge Road via Junior School and Hanworth Road (via Senior School). Bus services operate along both roads (bus stops in close proximity to school entrance).  Insufficient space to increase capacity of Junior School car pick-up/drop-off facilities to cater for pre-prep. Car pick-up/drop-off arrangements will need to be provided by provision of a new pick-up/drop-off facility adjacent to the pre-prep facility. However, the access to the west of the existing Sports Hall from Hanworth Road is not wide enough for two way traffic and cannot be widened due to existing buildings outside the boundary. Provision elsewhere on the site would conflict with safeguarding.	2/10
v. Relationship to Existing School Facilities	A pre-prep in this location would be capable of operating as a discrete facility. Loss of/re-provision of existing sports courts.	6/10
vi. Alternative Use Potential	Our initial view is that the potential to secure planning consent for an alternative (higher value) use of this land is low.	10/10
<b>Suitability Score</b>		30/60
<b>2. Planning Considerations</b>		
i. Previously Developed Land	Yes (playground/courts – not buildings)	5/10
ii. Metropolitan Open Land	The entire site is designated as MOL. Development will lead to the loss of MOL land and adversely affect openness. Provision of vehicle access link through the Senior Department site will increase MOL land take.	0/20
iii. Playing Fields	The entire site meets the statutory definition of playing fields. Development will lead to the loss of around 0.2ha. Provision of vehicle access link through the Senior Department site will increase playing field land take	0/10
iv. Access Arrangements (highway safety)	Vehicle access via existing access/egress arrangements (onto Hanworth Road). Increases in vehicle movements/trip-rates to be controlled via Travel Plan.	5/5
v. Loss of Residential Accommodation	None.	5/5
vi. Residential (neighbour) Amenity	The closest residential neighbours lie to the north of the River and extensive boundary vegetation.	5/5
vii. Urban Design (townscape/landscape)	The site is not visible from outside of the school site. Appropriate design can ensure not harm to local townscape quality.	5/5
viii. Historic Assets	Development of this site will not affect the setting of any listed buildings.	5/5
ix. Environmental	No known constraints	5/5
<b>Planning Score</b>		35/75
<b>Total Score</b>		<b>65/135</b>

## 7. Conclusions and Next Steps

### Summary of Evaluation Results

7.1 Table 7.1, below, sets out a summary of the site option evaluation score (in rank order):

*Table 7.1 Summary of Options Evaluation*

Rank	Site	Suitability Score	Planning Score	Total Score
1	Site 4 – Staff Residential Accommodation (South East)	44/60	50/75	94/135
2	Site 5 – Caretakers Buildings	44/60	45/75	89/135
3	Site 2 – Staff Residential Accommodation (north)	38/60	51/75	89/135
4	Site 3 – Rectory Lodge	42/60	45/75	87/135
5	Site 6 – Existing Car Park (west)	28/60	65/75	83/135
6	Site 7 – Land to North of Senior School B	34/60	50/75	79/135
7	Site 8 – Senior School Playground	40/60	35/75	65/135
8	Site 1 – Junior School Playground	29/60	26/75	55/135

### Summary Analysis of Sites

- 7.2 The above table sets out the pro-forma scores ranked on a total score basis (suitability and planning combined).
- 7.3 It is important to recognise that whilst Sites 1, 2, 6, 7 and 8 do achieve suitability scores (with Site 6 achieving the highest planning score) none of these sites are deliverable. All these sites scored zero in terms of site size and are unable of accommodating the development requirement as set out in Section 3. Consideration has been given to disaggregation of facilities, specifically the pick-up/drop-off requirement, but these locations within the school site conflict with emergency access, staff and pupil access and safeguarding of existing/future pupils which render all sites unsuitable for development.
- 7.4 Sites 3 and 5 achieve similar suitability scores, but are lower in their planning scores. Both these sites also include additional residential accommodation which is currently in use by the school.
- 7.5 Site 4 clearly scores as the preferred option, being the most suitably located, but also scores high in planning terms comprising previously developed land. The site fails to score higher in planning terms due to:

- The entire location is designated as MOL, although it does include existing development;

- Part of the location constitutes the statutory definition of playing fields, although the proposed pre-prep school use will require playground/field facilities as part of the proposed development; and
- The location would potentially result in the loss of one unit of residential accommodation.

7.6 Despite the above, it is considered that these items could be addressed through detailed design measures and that this site should be explored further.

## Conclusion

7.7 There is a current strategic policy conflict between protectionist MOL policy and firmly pro-development policies relating to education facilities which has the potential to prevent the further expansion of the school which is required to meet education need.

7.8 It has been clearly demonstrated that the existing MOL designation across the majority of the site prevents the strategic planning of growth to meet this need. This paper has set out the planning case in support of the principle of expanding the school and has demonstrated that exceptional circumstances exist. It is important that this is recognised as part of the local plan process to allow the Council to proactively plan for the identified education need.

7.9 This paper has reviewed the potential development options for expanding the school from a planning perspective and concludes that the school is currently unable to provide a new pre-prep facility within the existing parts of the site which are excluded from the MOL. Therefore, the LEHS is seeking to take forward a plan-led approach to assist its expansion through proactive engagement with the Council at their Hanworth Road site.

7.10 On this basis we request that these representations are taken into account as part of the preparation of the emerging Local Plan, and we welcome the opportunity to discuss our representations further to discuss the principle matters in advance of the preparation of detailed plans.





## Appendix I Site Aerial View





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## Appendix II Site Plan







## Appendix III Existing Site Diagram



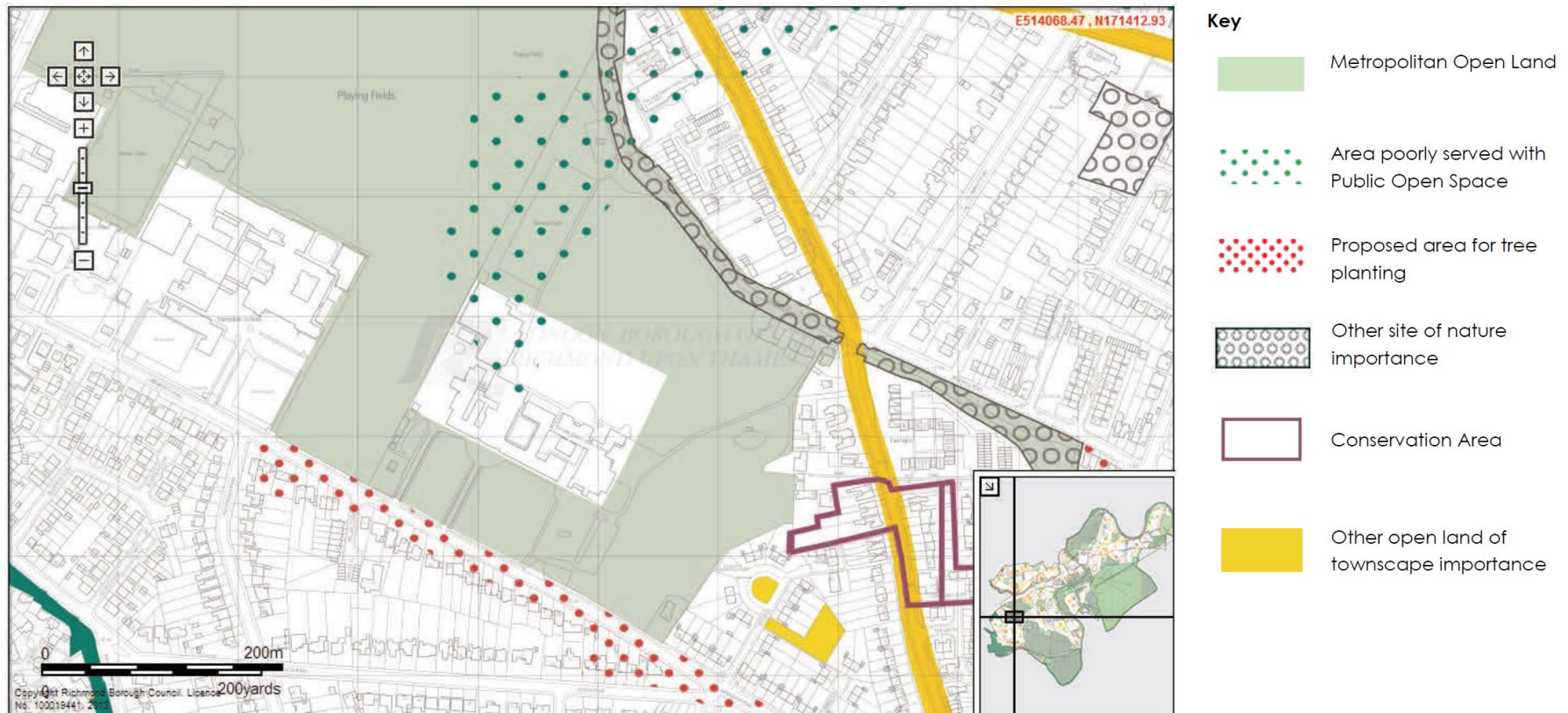




Appendix IV  
Core Strategy  
(2011)  
Proposals Map



Core Strategy (2011) Proposals Map Extract







## Appendix V Site Constraints and Opportunities Plan





## Appendix VI Site Planning History

Application Reference	Description	Decision
85/1679	Demolition of three cycle sheds and two open store sheds and the erection of one double garage for school mini buses.	Granted 09/01/1986
87/1190	Erection of two storey block to house art studios.	Granted 19/08/1987
91/0784/FUL	Demolition of 4 no. classrooms, erection of new link block including 6 classrooms, 6 seminar rooms, library, music room and new staircase.	Granted 07/06/1991
99/0501	Provision of new sports hall and associated accommodation, construction of new sports hall complex as an extension to existing swimming pool, including sports hall, changing rooms, rowing training area and entrance.	Granted 01/07/1999
00/1215	Erection of sports hall, changing rooms and associated facilities.	Granted 16/06/2000
08/1128/FUL	Erection of temporary classroom accommodation in the form of duplex 'portacabin' single storey structure for a five year period.	Granted 28/05/2008
09/0007/FUL	Replacement of existing childrens climbing frame and playhouse.	Granted 06/02/2009
10/0227/FUL	New Arts Centre and new Theatre, new Music Department and new Art Department and general teaching rooms. Refurbishment of existing dining room and Drama Department. New secondary entrance area and public frontage. Demolition of the existing Art Department and VI Form common room building. Associated landscape works, New building to form extension to the school's existing building.	Granted 30/04/2010
10/02523/VRC	Variation of conditions relating to BREEAM, hard and soft landscaping, tree planting scheme and phasing of development.	Granted 12/10/2010
11/0945/FUL	Revision to previously approved application 10/0227/FUL to allow 2 rooflights to the art department, 2 windows to south elevation and increased height of parapet to art and music department.	Granted 17/05/2011
11/2110/PS192	Certificate of Lawful Development for temporary accommodation in connection with and for the duration of the construction of the new arts centre (approved under 10/0227/FUL).	Approved 18/08/2011
10/0227/DD01	Details pursuant to conditions (materials, location of trees, adjacent development sites, tree planting scheme, hard and soft landscaping and potentially contaminated sites.	No further actions 23/10/2012
12/2468/VRC	Variation of condition re. approved applications 10/0227/FUL and 11/0945/FUL to allow for addition of balustrade to first floor roofs to the new art and music department; amendment to sill level of 2 windows on the eastern elevation and amendments to fenestration.	Granted 03/09/2012
13/1693/VRC	Application to vary condition U20968 of application ref 08/1128/FUL to extend the temporary period of the extant consent for an additional 3 years.	Granted 16/7/16
15/3128/FUL	Extension and works to existing buildings with associated landscaping works.	Granted 24 <sup>th</sup> September 2015
15/5139/FUL	Erection of temporary classroom accommodation in the form of a duplex 'portacabin' single storey structure for a temporary period	Granted 28 <sup>th</sup> January 2016

	of two years.	
15/3128/NMA	<p>Non-material amendment to planning approval 15/3128/NMA to allow for internal configuration to swimming changing rooms and access to existing pool remove existing internal stair; re-configure pupil toilets 1, 2 and 3; reconfigure design technology ancillary rooms and kitchenette area. External changes involve reconfigure doors to changing rooms and foyer to be moved/addition of ramps and step access to</p> <p>refurbished part of building. Addition of new steps/access to existing pool to match existing. Addition of plant related storage to west elevation. Fenestration changes to east and west facades. Addition of metal louvres to roof to screen plant. Changes to layout of hard landscape and car park area. Number of car parking spaces to remain as approved.</p>	Granted 22 <sup>nd</sup> July 2016
16/3117/FUL	Installation of gate to an existing vehicular crossover.	In progress



## Appendix VII Comparable Planning Applications



Table 1: Recent Applications for Educational Facilities within or Adjoining Metropolitan Open Land in LBRUT

Application Reference	Application Site	Development	MOL Development Considerations
12/3816/OUT	Christ's School East, Queens Road, Richmond	<u>Development within MOL</u> Outline application for new two storey detached building and single storey extension to provide a new sixth form and additional form entry to school. <b>Granted July 2013.</b>	Given the genuine demand for additional school spaces within the borough, the discreet siting of the proposed building to the rear of the existing school, set back from the road frontage, acceptable scale, additional landscape screening and location immediately adjacent to existing school, it was considered that the proposal would appear in context with existing school buildings therefore limiting the impact on the openness of the MOL to acceptable levels. NPPF recommends maximisation of school sites and the applicant provided evidence that alternative sites in other schools are also subject to MOL designation and could not meet the need arising. <b>Exception to MOL policy</b>
11/2906/FUL	Harrodian School, Lonsdale Road, Barnes	<u>Development within MOL</u> Erection of a sports hall with associated facilities. The Council considered the proposed sports hall would be inappropriate development in designated MOL and therefore contrary to local policies CP10 and DMOS2 and London Plan policy 7.17 <b>Refused October 2012</b> <b>Appeal dismissed September 2013.</b> Appeal reference: APP/L5810/A/13/2194493	Application was recommended for refusal. The Council considered that inappropriate development should not be permitted unless there are very special circumstances that outweigh the harm to the MOL. The applicant stated that very special circumstances to outweigh the harm are the need for the facility, the ability of third parties to use the facilities and proposed boundary improvements. The Council argued that although a need for the facility was recognised, no justification had been made to justify the overall scale of the development (including changing rooms, seating capacity, storage space, office etc) and location. The Council stated in their committee report that 'it is open to the applicant to apply for a parcel of land to be deleted from MOL designation in the development plan...[this] option has not been exercised'. The appeal was dismissed due to the harm that arises from inappropriate development in the MOL, the reduction in openness that the building would cause (an important quality of MOL). The Inspector found that the harm associated with inappropriate development in the MOL was not outweighed by other considerations so as to amount to the very special circumstance



			necessary to justify the development. Just . <b>Inappropriate use and no very special circumstances to justify departure from MOL policy</b>
10/2312/FUL	Grey Court School, Ham Street, Ham	<u>Development adjacent to MOL</u> Erection of single storey east side extension to existing school library, single storey west side extension to existing design and technology class rooms and single storey rear extension. <b>Granted December 2010</b>	Whilst open areas surrounding Grey Court School are designated MOL, the extensions were located outside MOL and as such there was no net loss of designated MOL as a result of this permission. <b>Compliant with MOL policy</b>
10/2200/FUL	Christ's School, Queens Road, Richmond	<u>Development adjacent to MOL</u> Three storey extension to the west façade of the existing main school building. <b>Granted October 2010</b>	Land surrounding the building complex is designated as MOL, however the extension is not proposed on MOL land. The extension would not materially impact on the MOL as it will be seen against the back drop of a higher building, and is within the built area of the school complex. <b>Compliant with MOL policy</b>
10/2226/FUL	Orleans Park School, Richmond Road, Twickenham	<u>Development adjacent to MOL</u> Creation of a new two storey extension to the north façade of the existing school building incorporating four new classrooms, office, plant room and staircase <b>Granted December 2010</b>	Proposed extension is set away from the MOL boundary by some 6 metres and therefore does not adversely impact upon the openness of this part of the site. <b>Compliant with MOL policy</b>
09/0680/FUL	Orleans Park School, Richmond Road, Twickenham	<u>Development part within MOL</u> Construction of an extension to male sports changing facilities and internal and external sports equipment stores. <b>Granted May 2005</b>	The extension only projects 5 metres into designated MOL. Given the modest scale and design of the extensions, and their location next to existing tennis courts and buildings, the proposal would not unduly compromise the openness of the MOL, and therefore this exceptional circumstance would not result in inappropriate development in MOL. <b>Exception to MOL policy.</b>

Table 2: Other Applications for Development on Metropolitan Open Land in LBRUT

Application Reference	Application Site	Development	Justification of MOL Development
10/0101/FUL	Pavilion, Palewell Common Drive, East	<u>Development within MOL</u> Refurbishment/modernisation of pavilion building and single storey extension to	Development on MOL considered acceptable because not of a scale to compromise the use of the open land, and was considered to support the outdoor use. Therefore this met the exception to the MOL

	Sheen	provide new café. <b>Granted March 2010</b>	policy. <b>Exception to MOL policy</b>
10/3016/FUL	Palewell Cottage, Palewell Common Drive, East Sheen	<u>Development within MOL</u> Change of use from single dwelling house to non-residential nursery and construction of single storey extension (c.50 sqm) to provide a classroom and WCs. <b>Granted January 2011</b>	Loss of residential use justified because provision of day nurseries is encouraged and would meet wider community need. In light of existing residential use, proposed nursery use in MOL considered acceptable and small scale extension would not compromise aims and objectives of MOL. <b>Exception to MOL policy</b>
07/1081/EXT	Lynde House, 28 Cambridge Park, Twickenham	<u>Development within MOL</u> Extension of time limit for 07/1081/FUL (erection of three single storey extensions to existing care home) <b>Granted August 2010</b>	Application on MOL land and would result in an increase of the existing building footprint by 17%, therefore contrary to MOL policies. However, considering the extant permission on site, the large size of the site and proximity of development to existing buildings, it was concluded that the openness of the MOL would not be materially eroded and an exception could be made in this case. <b>Exception to MOL policy</b>
08/0485/FUL	Lignarius House, Hampton Court Road, East Molesey	<u>Development part within MOL</u> Demolition of car showroom and associated offices in connection with redevelopment of site to provide 7 residential units and car parking (amendment to previously approved application 06/3618/FUL) <b>Granted May 2008</b>	The principle of the development was already established, but proposed development encroaches 8 metres on to MOL land. However, given the scale, bulk and mass of the proposals, and the removal of existing unsympathetic outbuildings and hard standing, it was considered that the scheme would not impact upon the openness and character of the MOL. <b>Exception to MOL policy</b>
08/4540/FUL	Royal Richmond Archery Club, Old Deer Park, Kew Road, Kew	<u>Development within MOL</u> Demolition of existing pre-fabricated single storey club house and construction of new timber framed single storey club house (90 sqm), archery store and indoor archery range. <b>Granted February 2009</b>	Proposed replacement building is of modest scale and related to the functional use of the MOL. In context of the large site/MOL and siting of the new building in close proximity to the road, the proposal would not have any adverse effect on the character and openness of the MOL. <b>Exception to MOL policy</b>



## Appendix VIII

Scott  
Brownrigg  
Architects  
Feasibility  
Plans

**Note:**

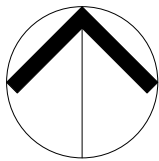
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This drawing is included in the Cognica Ltd Operations and Maintenance Manual published on 31/01/2014. (Recieved on 26/11/2014).

**Key:**



Extent of land owned by LEHS shown bounded in red

metres 40 80 120 160 200



1 Pre-Prep potential locations 17/08/16 MOR/ICP

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W scottbrownrigg.com

**SCOTT  
BROWNRIGG**

Client  
**The Lady Eleanor Holles School**

Job Title  
**Pre-Prep Facility**

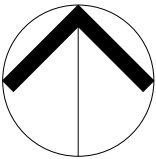
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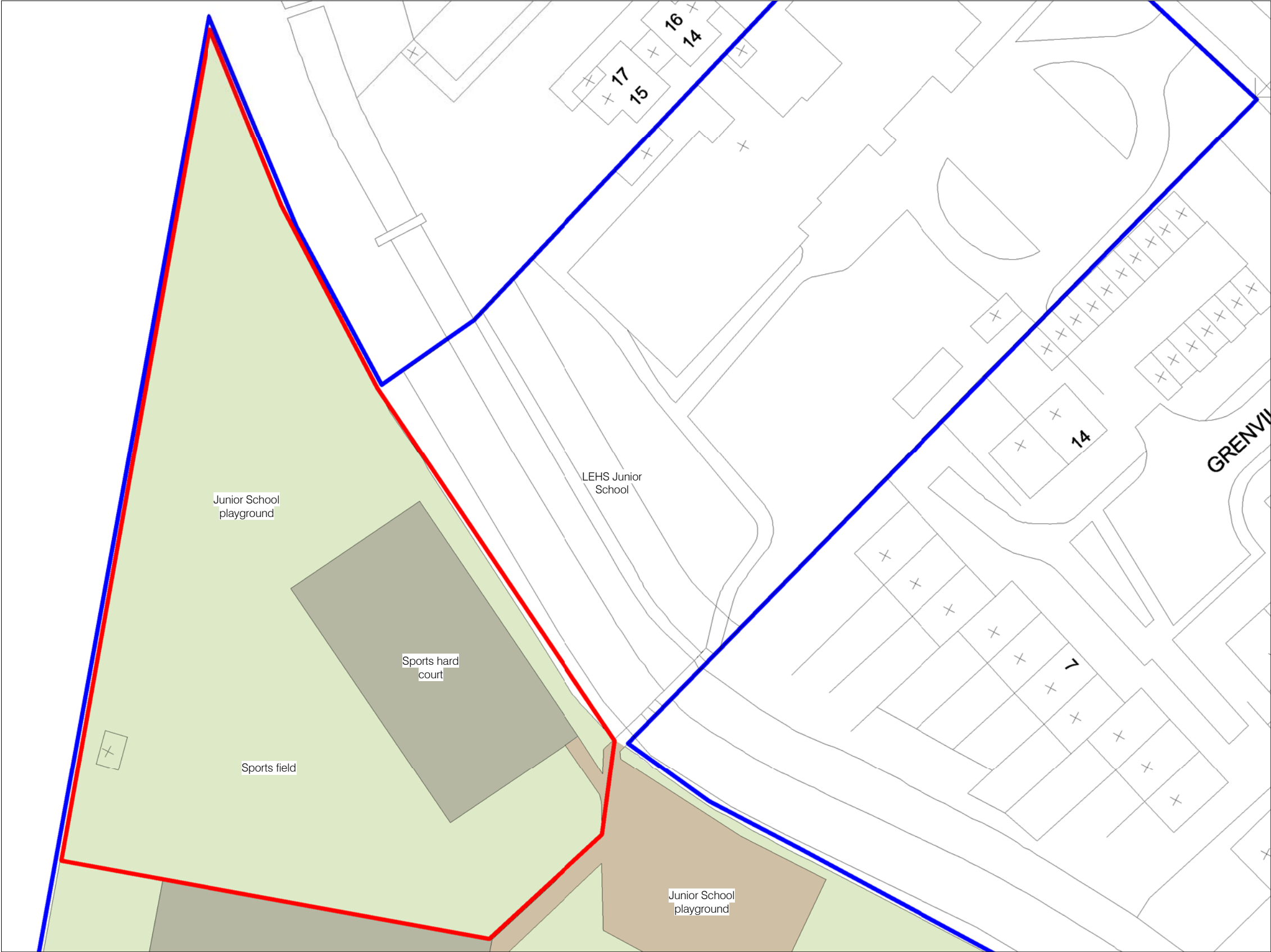
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Status  
**FOR INFORMATION**





- Key:
- Potential site considered for Pre-prep facility site
  - Extent of land owned by LEHS



1 Pre-Prep potential locations 17/08/16 MOR/ICP

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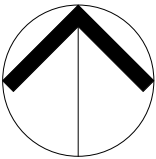
Job Title  
Pre-Prep Facility

Drawing Title  
Pre-Prep Potential Location 1 - As Existing

Scale  
As indicated @ A3

Project Number	Drawing Number	Rev
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Status  
FOR INFORMATION

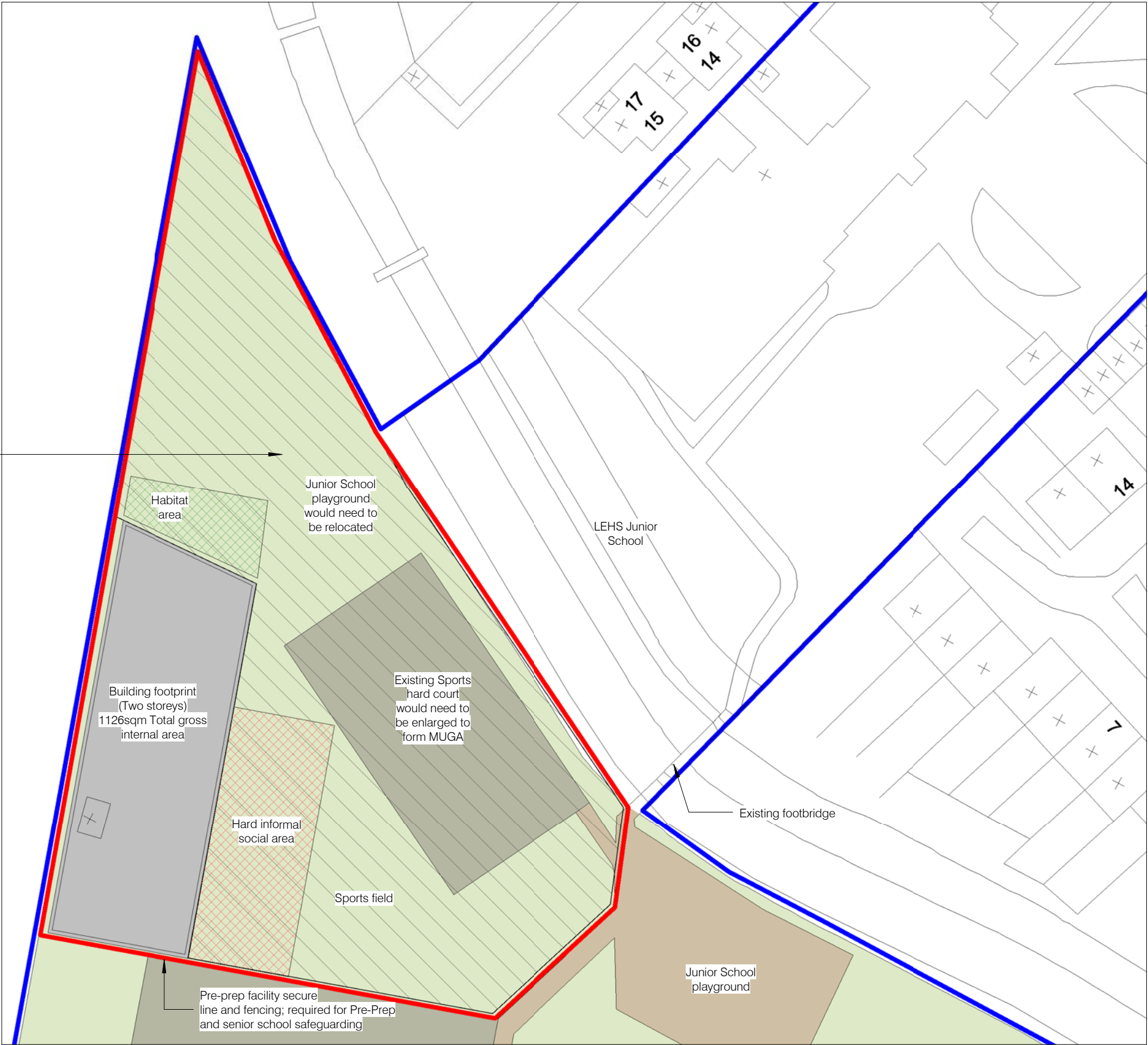


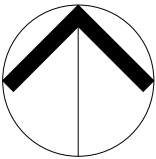
- Key:
- Potential site considered for Pre-prep facility site
  - Extent of land owned by LEHS
  - Net Site Area (a.k.a 'playing field area')

Potential Location 1

Pre-prep site area: 3623sqm  
Building footprint: 770sqm  
Gross floor area: 1126sqm  
Net site area: 2853sqm  
MUGA: **0sqm**  
Pick-up / Drop-off: **0sqm**  
Site within MOL

No vehicle access to this location. Required for construction, drop-off provisions and operation of Pre-Prep facility





Key:

- Potential site considered for Pre-prep facility site
- Extent of land owned by LEHS



1 Pre-Prep potential locations 17/08/16 MOR/ICP

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**SCOTT  
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Client  
**The Lady Eleanor Holles School**

Job Title  
**Pre-Prep Facility**

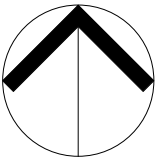
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Scale  
**As indicated @ A3**

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Status  
**FOR INFORMATION**





Key:

- Potential site considered for Pre-prep facility site
- Extent of land owned by LEHS
- Net Site Area (a.k.a 'playing field area')

Potential Location 2

Pre-prep site area: 1867sqm  
Building footprint: 770sqm  
Gross floor area: 1126sqm  
Net site area: 1206sqm  
MUGA: 0sqm  
Pick-up / Drop-off: 0sqm  
Site outside MOL

Residences to be demolished and relocated elsewhere in the LEHS campus

Net site area (a.k.a 'playing field area' would be insufficient)

Pre-Prep facility secure line and fencing; required for Pre-Prep and Senior School safeguarding

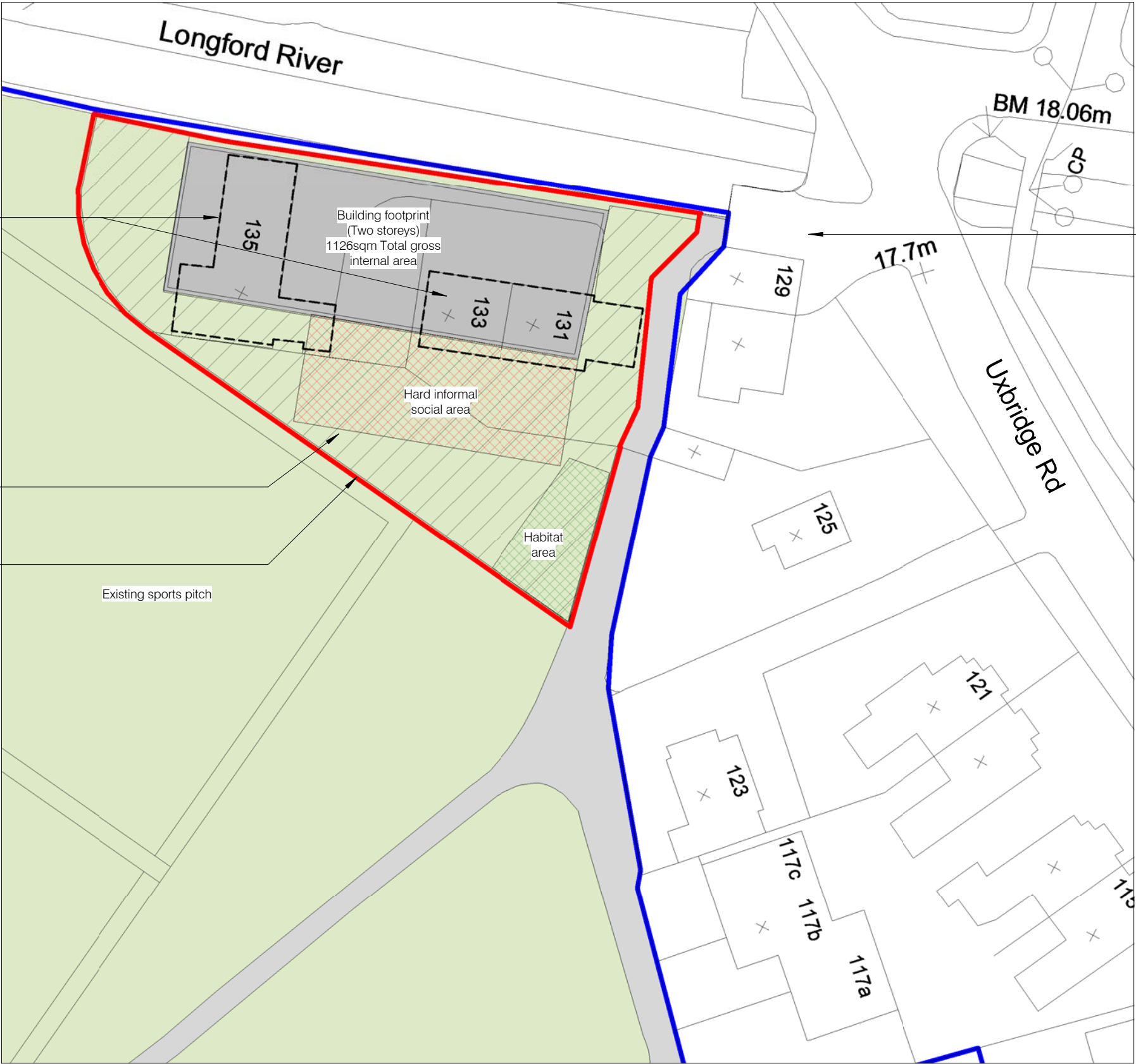
Existing sports pitch

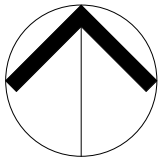
Building footprint (Two storeys)  
1126sqm Total gross internal area

Hard informal social area

Habitat area

Access route problematic for Pre-Prep drop-off and access to Senior School





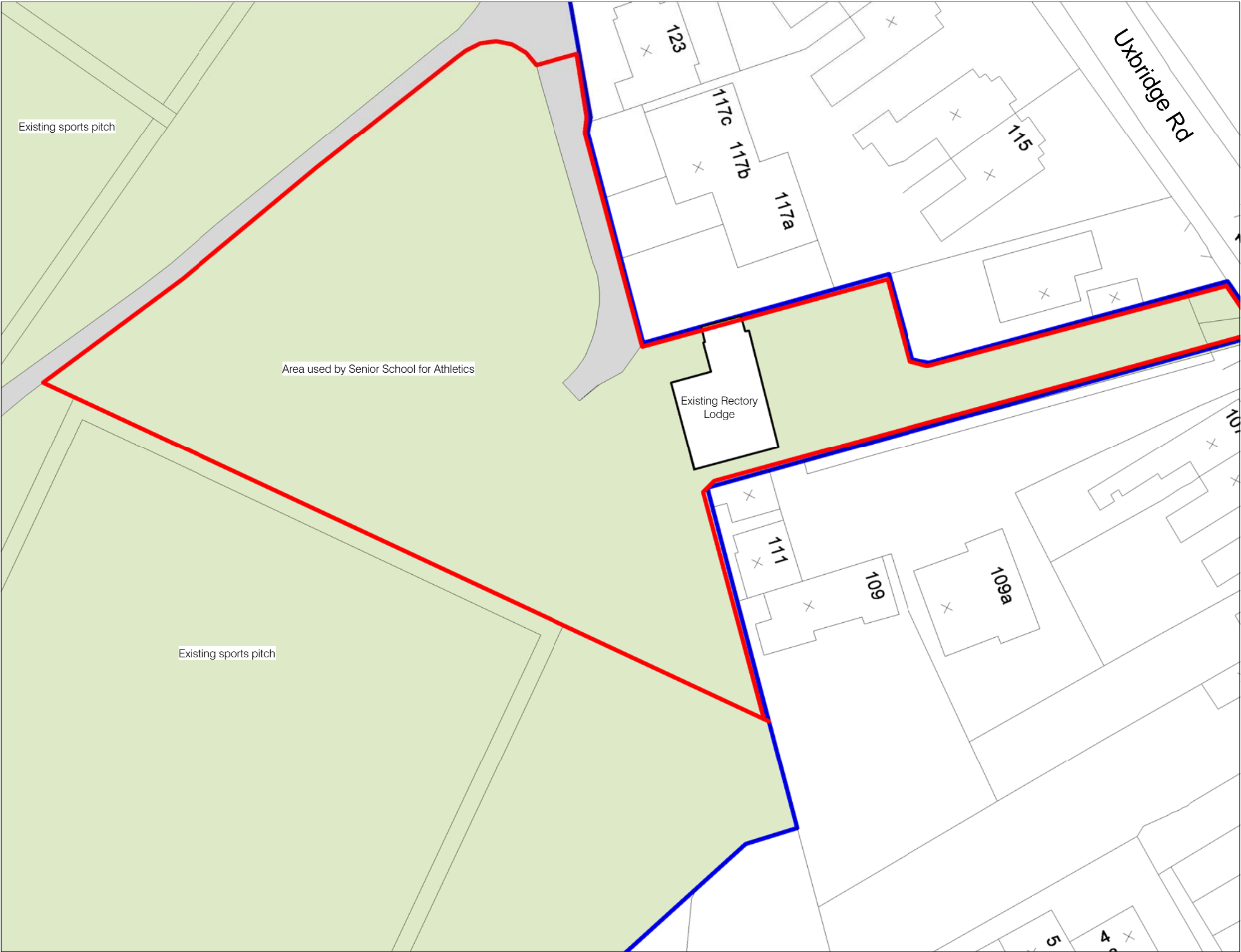
Key:



Potential site considered for Pre-prep facility site



Extent of land owned by LEHS



1 Pre-Prep potential locations 17/08/16 MOR/ICP

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SCOTT  
BROWNRIGG

Client

The Lady Eleanor Holles School

Job Title

Pre-Prep Facility

Drawing Title

Pre-Prep Potential Location 3 - As Existing

Scale

As indicated @ A3

Project Number

16360

Drawing Number

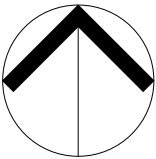
SK(10) 105

Rev

1

Status

FOR INFORMATION



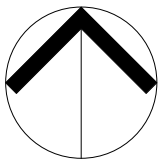
- Key:
- Potential site considered for Pre-prep facility site
  - Extent of land owned by LEHS
  - Net Site Area (a.k.a 'playing field area')

Potential Location 3

Pre-prep site area: 3986sqm  
Building footprint: 770sqm  
Gross floor area: 1126sqm  
Net Site Area: 1886sqm  
MUGA: 730sqm  
Pick-up / Drop-off: 600sqm  
Site within MOL







Key:

Potential site considered for Pre-prep facility site

Extent of land owned by LEHS



1 Pre-Prep potential locations 17/08/16 MOR/ICP

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Client  
The Lady Eleanor Holles School

Job Title  
Pre-Prep Facility

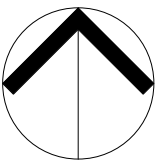
Drawing Title  
Pre-prep Potential Location 4 - As Existing

Scale  
As indicated @ A3

Project Number	Drawing Number	Rev
16360	SK(10) 107	1

Status  
FOR INFORMATION

metres 10 20 30 40 50



- Key:
- Potential site considered for Pre-prep facility site
  - Extent of land owned by LEHS
  - Net Site Area (a.k.a 'playing field area')

Potential Location 4

Pre-prep site area: 6000sqm  
Building footprint: 770sqm  
Gross floor area: 1126sqm  
Net Site area: 1300sqm  
MUGA: 730sqm  
Pick-up / Drop-off: 3000sqm  
Site within MOL



1 Pre-Prep potential locations 17/08/16 MOR/ICP

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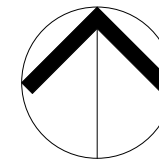
Job Title  
Pre-Prep Facility

Drawing Title  
Pre-prep Potential Location 4

Scale  
As indicated @ A3

Project Number Drawing Number Rev  
16360 SK(10) 108 1

Status  
FOR INFORMATION



Key:

- Potential site considered for Pre-prep facility site
- Extent of land owned by LEHS

Student Gateway pedestrian entry way for Senior School

Existing substations

Existing facilities team workshops

Caretaker garage

Deliveries and facilities team entrance (Vehicular and pedestrian)

Caretaker residence

Senior School entrance



1 Pre-Prep potential locations 17/08/16 MOR/ICP

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**SCOTT  
BROWNRIGG**

Client

**The Lady Eleanor Holles School**

Job Title

**Pre-Prep Facility**

Drawing Title

**Pre-Prep Potential Location 5 - As Existing**

Scale

**As indicated @ A3**

Project Number

**16360**

Drawing Number

**SK(10) 109**

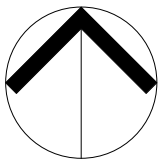
Rev

**1**

Status

**FOR INFORMATION**





- Key:
- Potential site considered for Pre-prep facility site
  - Extent of land owned by LEHS
  - Net Site Area (a.k.a 'playing field area')

Potential Location 5

Pre-prep Site area: 6000sqm  
Building footprint: 770sqm  
Gross internal floor area: 1126sqm  
Net Site area: 2237sqm  
MUGA: 730sqm  
Pick-up / Drop-off: 3000sqm  
Site area within MOL

Access to Student Gateway compromised by Pre-Prep facility.

Existing substation must be retained in existing location

Impact on existing tree; may need to be removed

Existing facilities team workshops would need to be demolished

Existing garage would need to be demolished/relocated

Impact on existing tree; may need to be removed

Caretaker residence. two storey brick dwelling would need to be demolished and relocated elsewhere in the LEHS campus

Deliveries and facilities team entrance would need to be relocated



Senior School entrance and existing VIP parking area compromised by Pre-Prep facility parking

Pre-Prep facility secure line and fencing; required for Pre-Prep and Senior School safeguarding

Existing Senior School social area and tennis courts would be lost

1 Pre-Prep potential locations 17/08/16 MOR/ICP

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Client  
The Lady Eleanor Holles School

Job Title  
Pre-Prep Facility

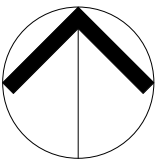
Drawing Title  
Pre-Prep Potential Location 5

Scale  
As indicated @ A3

Project Number Drawing Number Rev  
16360 SK(10) 110 1

Status  
FOR INFORMATION





Key:



Potential site considered for Pre-prep facility site



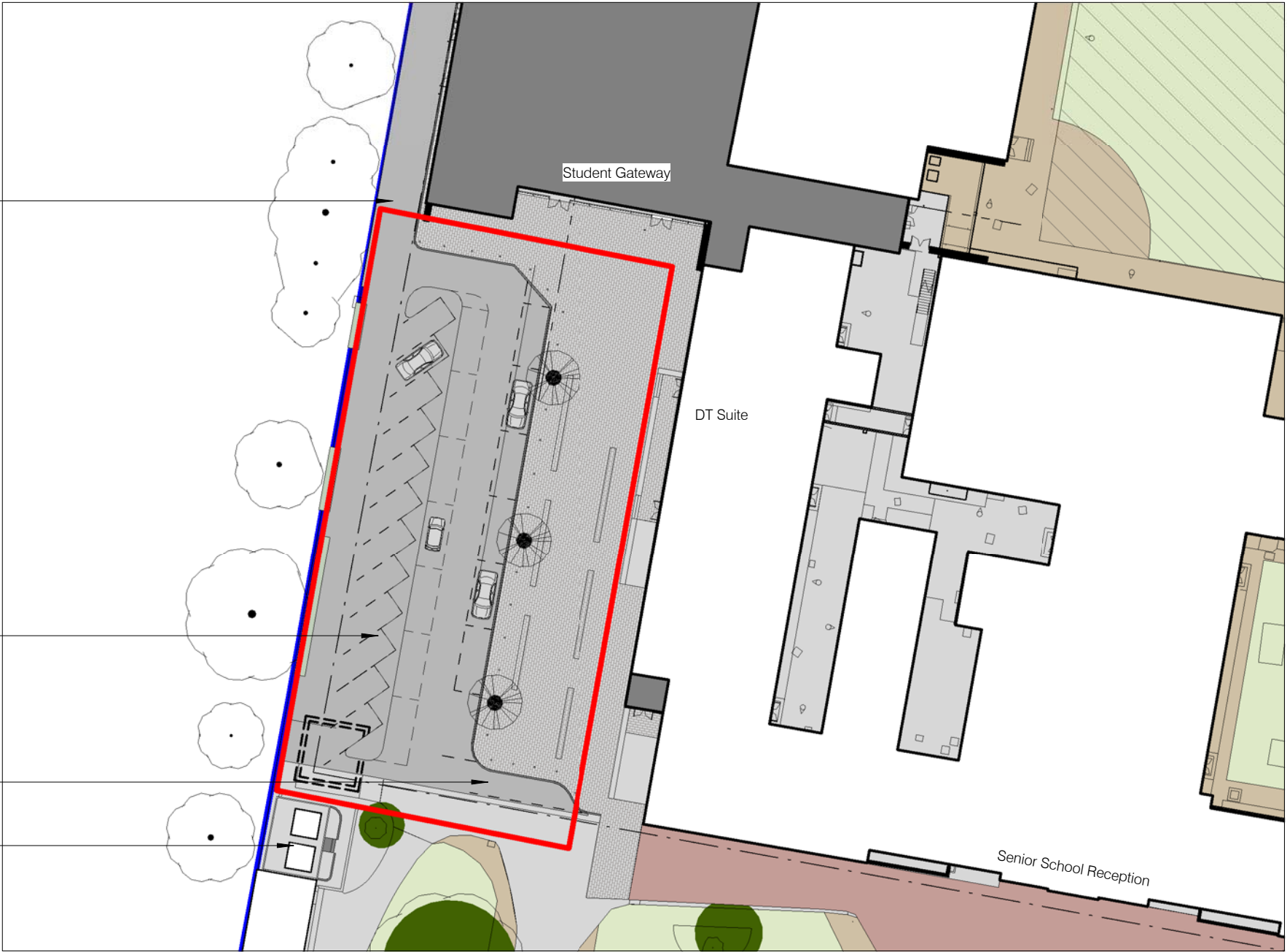
Extent of land owned by LEHS

Emergency Service access

Student Gateway car park

Student Gateway Pedestrian entry way for Senior School

Existing substations



1 Pre-Prep potential locations 17/08/16 MOR/ICP

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BROWNRIGG

Client

The Lady Eleanor Holles School

Job Title

Pre-Prep Facility

Drawing Title

Pre-Prep Potential Location 6 - As Existing

Scale

As indicated @ A3

Project Number

16360

Drawing Number

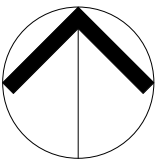
SK(10) 111

Rev

1

Status

FOR INFORMATION



Key:

- Potential site considered for Pre-prep facility site
- Extent of land owned by LEHS
- Net Site Area (a.k.a 'playing field area')

Potential Location 6

Pre-prep site area: 1487sqm  
Building footprint: 770sqm  
Gross floor area: 1126sqm  
Net Site Area: 380sqm  
MUGA: 0sqm  
Pick-up / Drop-off: 0sqm  
Site outside MOL

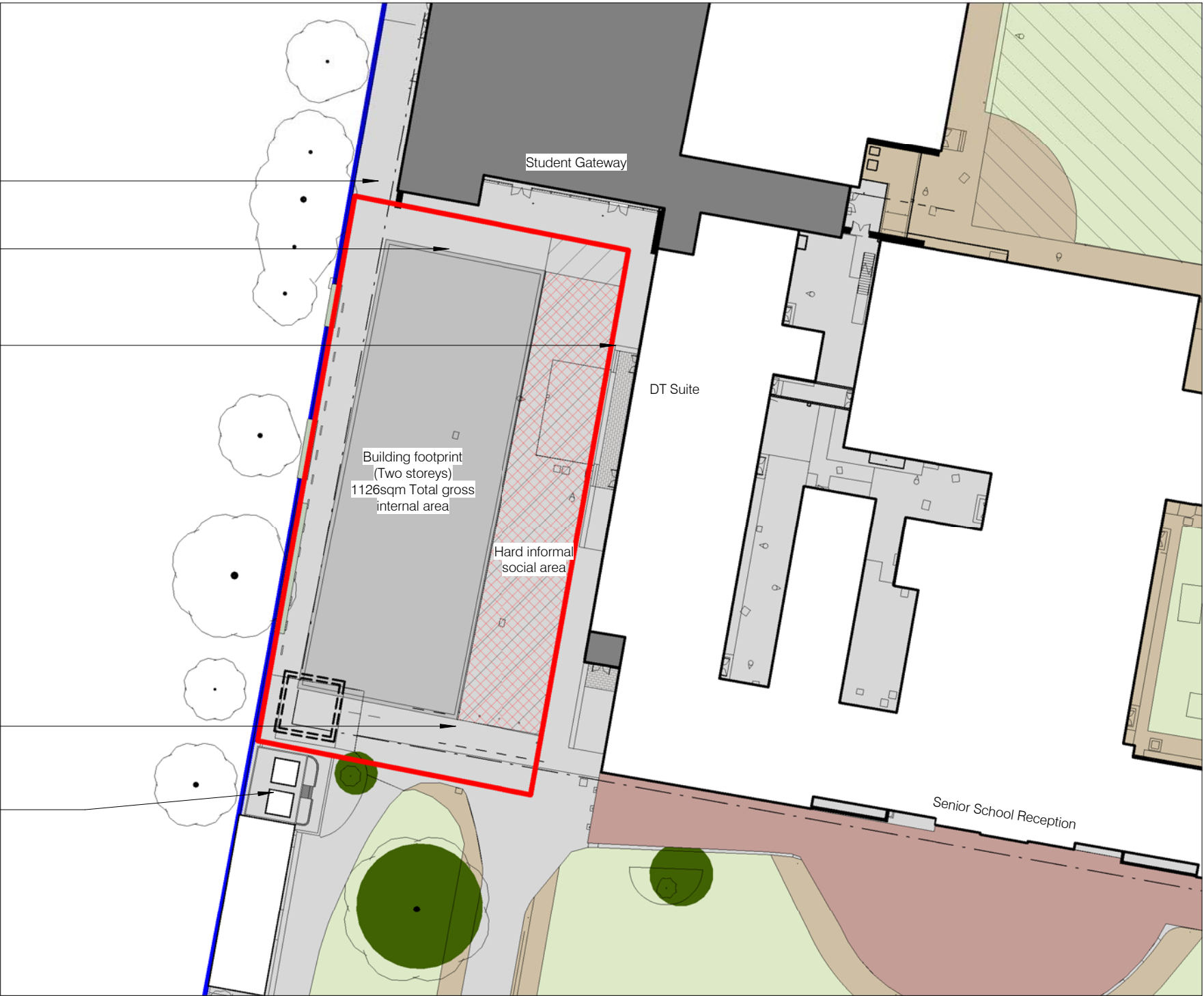
Emergency Service access must be maintained

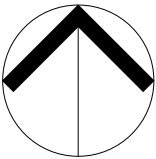
Statutory requirement for daylight in existing and proposed buildings compromised

Pre-Prep facility secure line and fencing; required for Pre-Prep and Senior School safeguarding compromised

Student Gateway pedestrian entry way for Senior School compromised

Existing substations which must be retained in existing location constrains area





- Key:
- Potential site considered for Pre-prep facility site
  - Extent of land owned by LEHS



1 Pre-Prep potential locations 17/08/16 MOR/ICP

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Client  
The Lady Eleanor Holles School

Job Title  
Pre-Prep Facility

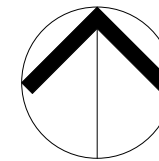
Drawing Title  
Pre-Prep Potential Location 7 - As Existing

Scale  
As indicated @ A3

Project Number	Drawing Number	Rev
16360	SK(10) 113	1

Status  
FOR INFORMATION





Key:

- Potential site considered for Pre-prep facility site
- Extent of land owned by LEHS
- Net Site Area (a.k.a 'playing field area')

Potential Location 7

Pre-prep site area: 3000sqm  
Building footprint: 770sqm  
Gross floor area: 1126sqm  
Net Site Area: 1500sqm  
MUGA: 730sqm  
Pick-up / Drop-off: **0sqm**  
Site outside MOL



Car parking could not be accommodated in this location, therefore, Pre-Prep parents would have to walk for more than 500m to drop-off/collect their children. This would significantly compromise safeguarding with Senior School pupils

Loss of visual amenity (loss of views of sport pitches from Senior School)

Access to Senior School, outdoor social areas and sports pitches would be compromised

1 Pre-Prep potential locations 17/08/16 MOR/ICP

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Client  
**The Lady Eleanor Holles School**

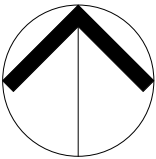
Job Title  
**Pre-Prep Facility**

Drawing Title  
**Pre-prep Potential Location 7**

Scale  
**As indicated @ A3**

Project Number	Drawing Number	Rev
<b>16360</b>	<b>SK(10) 114</b>	<b>1</b>

Status  
**FOR INFORMATION**



- Key:
- Potential site considered for Pre-prep facility site
  - Extent of land owned by LEHS



1 Pre-Prep potential locations 17/08/16 MOR/ICP

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Client  
The Lady Eleanor Holles School

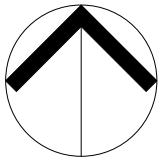
Job Title  
Pre-Prep Facility

Drawing Title  
Pre-Prep Potential Location 8 - As Existing

Scale  
As indicated @ A3

Project Number	Drawing Number	Rev
16360	SK(10) 115	1

Status  
FOR INFORMATION



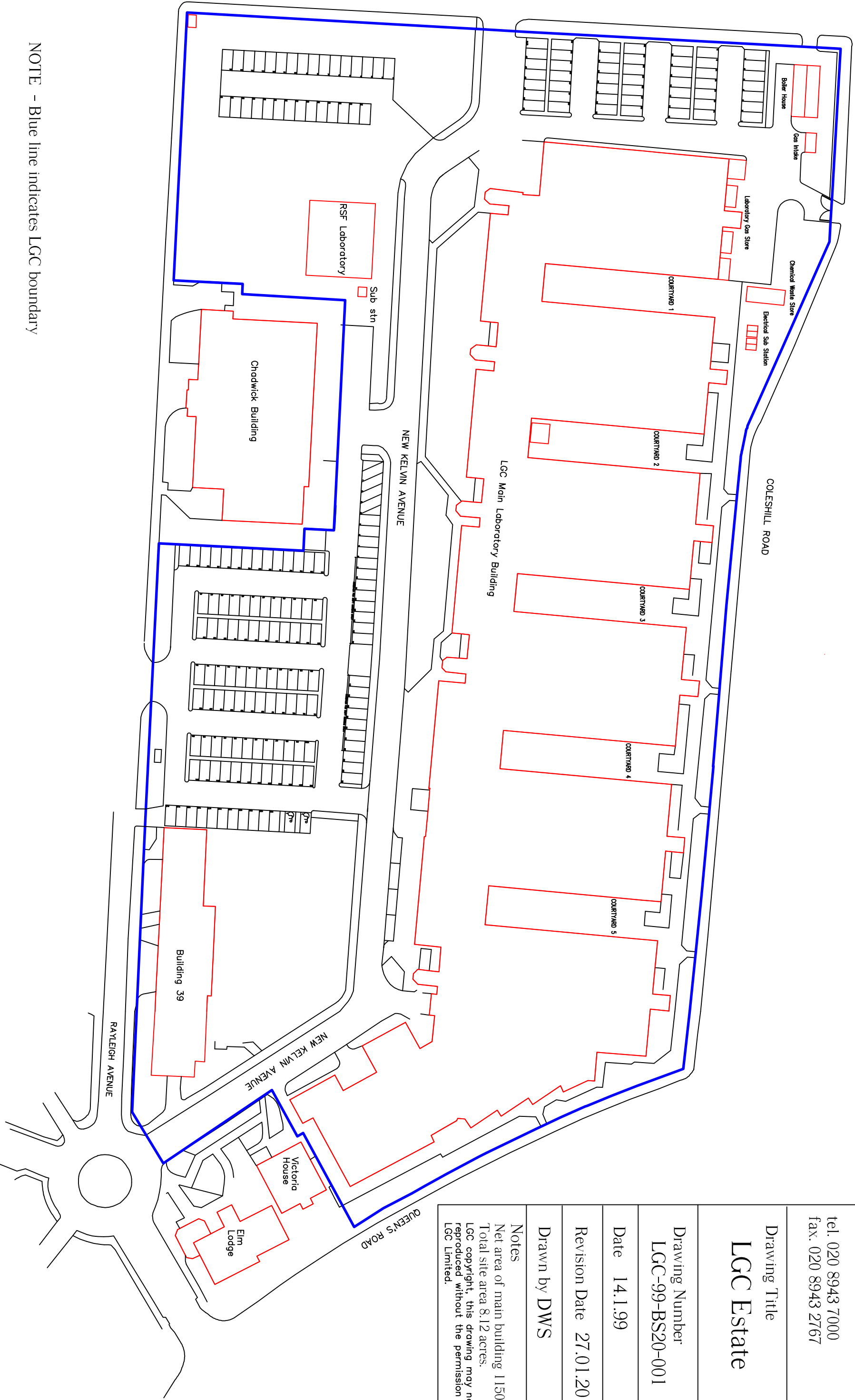
- Key:
- Potential site considered for Pre-prep facility site
  - Extent of land owned by LEHS
  - Net Site Area (a.k.a 'playing field area')

Potential Location 8

Pre-prep site area: 6000sqm  
Building footprint: 770sqm  
Gross floor area: 1126sqm  
Net Site Area: 1500sqm  
MUGA: 730sqm  
Pick-up / Drop-off: 3000sqm  
Site within MOL



<b>LGC Limited</b>	
Queens Road Teddington Middx TW11 0LY	
tel. 020 8943 7000 fax. 020 8943 2767	
Drawing Title	<b>LGC Estate</b>
Drawing Number	
LGC-99-BS20-001	
Date 14.1.99	
Revision Date 27.01.2016	
Drawn by DWS	Notes Net area of main building 11500 m2. Total site area 8.12 acres. LGC copyright, this drawing may not be reproduced without the permission of LGC Limited.





Planning Policy, LB Richmond  
Civic Centre, 44 York Street  
Twickenham  
TW1 3BZ  
[LocalPlan@richmond.gov.uk](mailto:LocalPlan@richmond.gov.uk)

18 August 2016

By Email Only

Dear Sir / Madam,

## Consultation on the Pre-publication version of the Local Plan

### Re: LGC Ltd. draft Mixed-Use Allocation – Pre-Publication version of the Local Plan Consultation August 2016

We write on behalf of our client LGC Ltd. and in response to the above consultation. These representations follow previous comments submitted to London Borough Richmond upon Thames (LBRuT) on 28 January 2016 in response to 'Consultation on the Scope for the Review of the Policies'. In addition, on 28 June 2016 the site was submitted to the GLA London SHLAA for consideration. These representations do not seek to repeat the background information previously provided, notwithstanding the two sets of representations should be read together (see Appendix 2). These representations seek to further make the case for a mixed-use allocation at the site, allowing for enabling development to support the LGC Ltd business.

LGC Ltd was founded in 1996 following the privatisation of the Laboratory of the Government Chemist. The company's headquarters is located on Queens Road in Teddington (herewith known as 'the site'). A site plan is enclosed (see Appendix 1). The site is incorrectly named within the Pre-Publication version of the Local Plan as 'Laboratory of the Government Chemist'. Subsequent to privatisation the company is simply known now as LGC Limited (to be amended on pages p180, 189 and 266 of the pre-publication version).

It is also worthy of note that two buildings, previously owned by LGC Ltd, fronting Queen's Road have subsequently been sold by LGC Ltd and now benefit from a change of use to residential. As such, these should be removed from within the LGC Ltd boundary.

The pre-publication version of the Local Plan seeks to protect the overall LGC Ltd site as 'Locally Important Industrial Land and Business Park'. As previously stated, we are seeking to remove the LGC Ltd site from the proposed employment allocation, instead advocating an employment/residential mixed-use allocation, allowing for the redevelopment of the site to provide LGC Ltd with a modern, fit for purpose facility. This will provide LGC Ltd with an opportunity to respond to recent and on-going significant operational changes, changes in customer requirements and the continued evolution of scientific

techniques. This would allow LGC Ltd to be much better positioned to continue their operations within LBRuT.

LGC Ltd can only continue to operate from within LBRuT if enabling residential development can be implemented on part of the site to cross-subsidise the development of a new fit-for-purpose facility. The existing building suffers from some of the highest running costs associated with any of the UK LGC sites and is as such not fit for LGC's purposes.

The importance of retaining LGC Ltd within the borough is highlighted within the pre-publication version of the Local Plan. Paragraph 10.1.4 states "the borough is home to nationally important scientific institutions such as the head office of the Laboratory of the Government Chemist (LGC)". This paragraph goes on to state that "Scientific, innovation and research, provision of incubator units and laboratories will be supported", (emphasis by CBRE).

We have reviewed and assessed the pre-publication document, along with a number of evidence based studies. CBRE, on behalf of LGC Ltd fully advocate the allocation of the site for mixed-use development, positively contributing to the housing land supply position of the borough, whilst supporting and promoting an important local and regional employer.

#### **Housing Need Position:**

##### The London Plan and Pre-Publication Version Local Plan

Proposed Policy LP34 specifically relates to housing, housing targets and five year housing land supply. Policy LP34 confirms the Borough's target over the period 2015-2025 of 3,150 homes, or 315 dwellings per annum, as prescribed by the London Plan (FALP). LBRuT proposes to retain this target until a replacement London Plan target is agreed. Crucially, the policy clearly states that "the Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies".

We strongly agree with the principle of exceeding the minimum strategic requirement, taking into consideration the London Plan's (FALP) requirement that housing numbers should be considered minimums, rather than maximums. Indeed, the Inspector's review into the London Plan FALP overall found the Plan strategy would not deliver sufficient homes to meet objectively assessed housing need. The GLA are beginning the process of preparing a new London Plan. Given the ever increasing pressure on housing, it is very likely that any housing requirement for LBRuT will increase. As such, it is the duty of LBRuT to prepare for this increase and ensure that any new Local Plan allows for future increases in requirement. The London Plan is currently being redrafted and will include for an increased housing target. This is likely to be in the region of 60,000 dwellings (net) per annum or 50,000 dwellings (net) per annum as a minimum. There will be an expectation for the outer London Boroughs to meet much of this additional need.

The LBRuT emerging Local plan proposed to set out a 15 year strategic vision (up to 2033). Policy 3.3 of the London Plan states that Borough's should seek to achieve and exceed the relevant minimum borough annual average housing target, if a target beyond 2025 is required, boroughs should roll forward and seek to exceed [housing targets].

In addition, Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets and in particular the potential to realise brownfield housing capacity

through the spatial structure it provides, including mixed-use redevelopment, especially of surplus commercial capacity and particularly that with good transport accessibility.

Supporting paragraph 9.1.4 of the pre-publication version of the Local plan states a five year housing land supply potentially (emphasis by CBRE) providing for 2154 units over the next five years. This would equate to 579 units more than the 'target' supply in the London Plan. As a result, the paragraph notes that the borough is on course to meet and exceed the strategic dwellings requirement.

CBRE have carried out a high-level assessment of the sites that contribute to this proposed housing delivery as illustrated in the AMR (2014/15). It is highly likely that a number of suggested sites, (particularly proposal/other known sites), or phases of sites will not be delivered over the five year period. As such, other available, suitable and achievable sites should be allocated to ensure that LBRuT's Housing Land Supply Position is robust.

The Pre-publication version of the Local Plan makes reference to the Strategic Housing Market Assessment (SHMA) 2016 in supporting paragraph 9.1.5. Broadly speaking, the SHMA concludes that the unconstrained demographic position in the borough is for 895-915 dwellings per annum throughout the 2014-33 period. As such, if the LGC Ltd site is allocated for mixed-use, this would create the potential for substantial housing delivery on a brownfield site that will assist in circumventing the notably constrained nature of LB Richmond.

Proposals for the LGC site would also meet the objectives of supporting paragraph 9.1.7 by optimising the potential of the site and ensuring the majority of housing delivery in the borough is on previously developed land. Paragraph 9.1.8 continues by stating that "housing delivery against the borough target is capable of being met without the release of employment land, although there is potential for housing gain on employment land through mixed uses schemes (emphasis by CBRE) which retains or enhances the level of existing employment floorspace". This point is further iterated in proposed Policy LP40. The proposed reduction in employment floorspace at the site directly results from the evolution and miniaturisation of scientific method and process, requiring less space that has been historically necessary. A special case exists here, whereby a mixed use redevelopment would allow for both the retention of a significant, specialised employer within the Borough, alongside a significant addition to the Borough's housing land supply.

#### Strategic Housing Market Area (SHMA) – June 2016

The SHMA notes that due to the complex interactions between Boroughs and across the Capital, London is defined by GLA as a housing market area in its own right, albeit the SHMA deals solely with housing need in LB Richmond. Given this, full regard should be given by LBRuT to the wider housing need across London and as such assist where possible in delivering sustainable housing, especially as part of wider mixed-use proposals.

Paragraph 2.39 of the SHMA (2016) states the wider housing need across London. 42,000 homes per annum (net) are planned for 2015-2025. This falls below the need projections in the London SHMA 2013 which indicated a need for between 48,841pa (2015-36) and 62,088 pa (2015-36) homes a year across the Capital. A mixed-use development at Queen's Road in Teddington would help to deliver sustainable housing to support London's wider housing requirement.

The SHMA confirms the 2015 London Plan (as updated) sets a minimum 10 year target for 3,150 homes between 2015 and 2025 (315 per annum) for Richmond Borough. Notably, this figure takes into

account a constrained land supply position. Based on population projection data, the SHMA confirms projections of 16.3% population growth in Richmond from 2014 to 2033, resulting in a housing need for 913 dwellings per annum. However, the SHMA, making reference to the GLA SHLAA position, reduces that population growth to 1.8%, reflecting a long term constrained supply position. As such, given the impact of such a constrained supply of housing land we would strongly suggest that LB Richmond would benefit from a mixed-use allocation at the site, allowing for the development of a significant quantum of housing, alongside the retention of an important local employer of national significance.

#### Annual Monitoring Report: Five Year Housing Land Supply Position

The AMR (2014/2015) evaluates a number of sites that make up the Council's five year housing land supply. We consider given the current market price adjustment post-referendum, there is potential for a number of sites to take longer to develop than originally expected. Importantly, this could well impact upon the delivery timescales and phasing for larger sites. It is also likely that a number of landowners and developers could re-evaluate proposed schemes including reappraising viability. As such, this may well result in scheme re-design seeking a new, implementable planning permission. The impact of this to timescales could subsequently mean specific sites (small and large) could drop out of the five year housing land supply. To ensure an available, suitable and achievable five year housing land supply can be demonstrated, we would strongly advocate that the LGC site is afforded a mixed-use allocation that provides for an available, suitable and deliverable site that can both help LBRuT achieve a deliverable housing land supply, whilst also retaining a high level of employment at the site.

In addition, upon review of LB Richmond's 6-10 year supply, there seem few sites that will likely be able to be delivered within the five years. As such, there are insufficient sites that could be brought forward if so required upon any five year delivery shortfall.

In summary, a proportion of the site is no longer required by LGC, whilst the facility requires substantial modernisation and structural change. In light of the above, it is therefore proposed that a mixed-use residential/employment allocation would be both suitable and appropriate enabling development, allowing LGC Ltd to have a continuing presence in LB Richmond for the foreseeable future.

We trust that the above comments are helpful in the context of the emerging Local Plan. We would be grateful if you could confirm receipt of this letter and that the representations have been duly considered. Should you wish to discuss this matter in more detail, please do not hesitate to contact me.

Yours faithfully

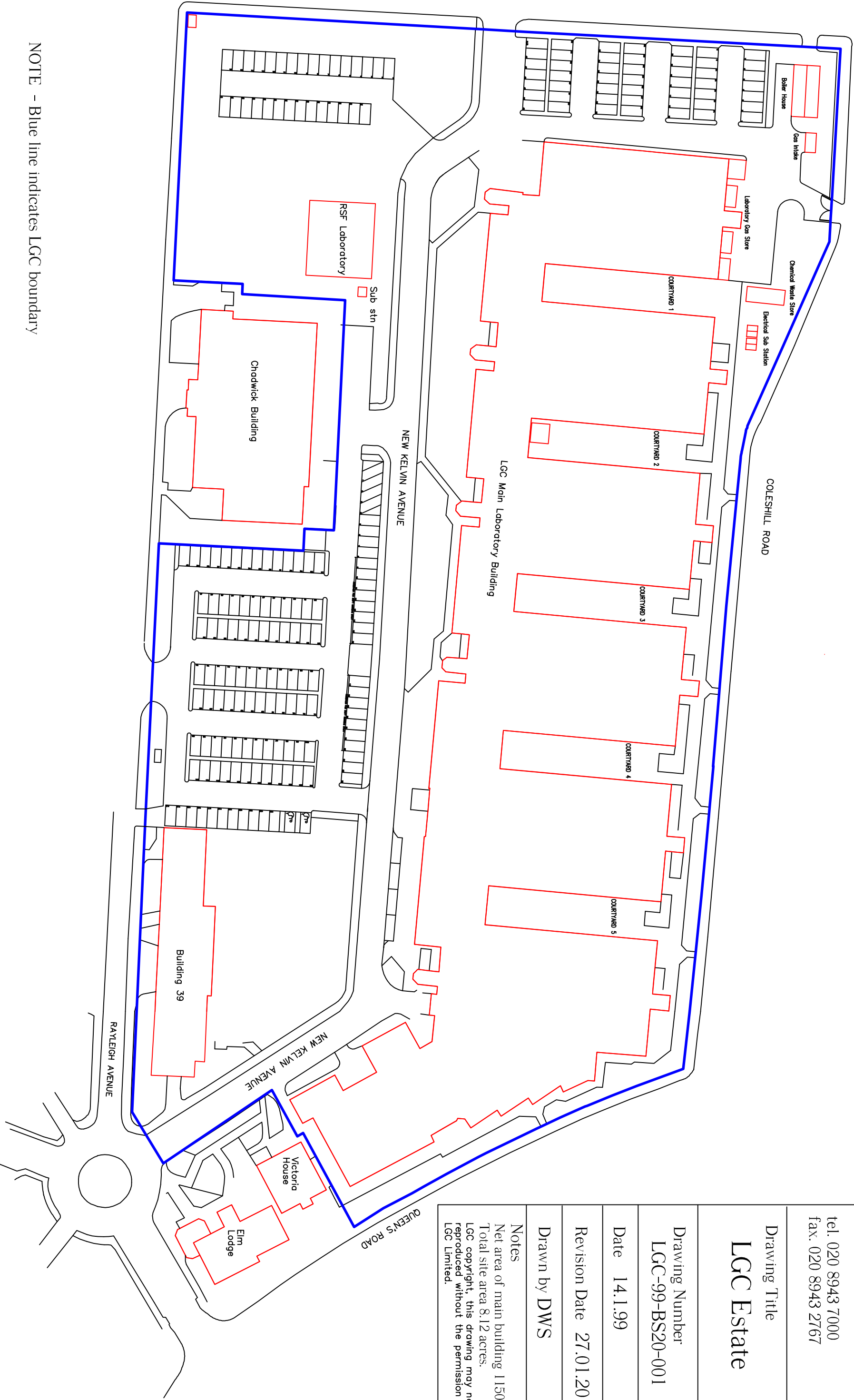


**JONATHAN STODDART**  
**SENIOR DIRECTOR – PLANNING**

CBRE Limited for and on behalf of LGC Ltd.

Enc.      Appendix 1 Site Plan  
            Appendix 2 Copy previous representations

<div>LGC Limited</div> <div>Queens Road</div> <div>Teddington</div> <div>Middx TW11 0LY</div> <div>tel. 020 8943 7000</div> <div>fax. 020 8943 2767</div>			
<div>Drawing Title</div> <div>LGC Estate</div>			
<div>Drawing Number</div> <div>LGC-99-BS20-001</div>			
<div>Date</div> <div>14.1.99</div>			
<div>Revision Date</div> <div>27.01.2016</div>			
<div>Drawn by</div> <div>DWS</div>			
<div>Notes</div> <div>Net area of main building 11500 m2.</div> <div>Total site area 8.12 acres.</div> <div>LGC copyright, this drawing may not be reproduced without the permission of LGC Limited.</div>			



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Direct Line +44 (0)20 7182 2752  
jonathan.stoddart@cbre.com

28<sup>th</sup> January 2016

Planning Policy, LB Richmond  
Civic Centre, 44 York Street  
Twickenham  
TW1 3BZ

Dear Sir/Madam

## **Consultation on the Scope for the Review of the Policies**

### **Re: National Physical Laboratory draft Allocation – Local Plan Consultation December 2015**

We write on behalf of our client LGC and in response to the above consultation.

LGC was founded in 1996 following the privatisation of the Laboratory of the Government Chemist. The company's headquarters is located on Queens Road in Teddington; a site plan is enclosed (herewith known as 'the site'). The site is incorrectly identified within the consultation draft plan under the demise of the National Physical Laboratory, Hampton Road, Teddington (p56).

The document seeks to protect the overall LGC site for 'proposed protection of key employment land'.

On behalf of our client we are seeking to remove the LGC site from the proposed employment allocation, and therefore formally disagree with the indicative identification of the NPL site as shown in Appendix 3 of the Local Plan consultation document. LGC's Teddington site is increasingly becoming unfit for purpose due to significant changes in LGC's business model, but more critically as a result of changes in customer requirements and the evolution of scientific techniques.

Due to the original design and construction methods used, the building has a higher operating cost than any other UK LGC site, which is unsustainable in the medium to longer term. These higher operating costs and inefficiencies are due to the facility originally being designed and built for wet chemistry laboratory operations. Over time, these scientific methods have changed considerably, particularly with the introduction of instrument based analytical methods (e.g. liquid & gas chromatography and mass spectrometry etc). Therefore, the site in its current form is now constraining LGC's operating model in Teddington rather than enabling delivery of the objectives that LGC wishes to achieve.

The site remains an important facility to LGC with its large local workforce and it is LGC's intention to retain the site as its group headquarters and part of its UK laboratory operations. However, we respectfully request that a new mixed-use site allocation is identified in the emerging plan.

The cost of upgrading the facilities is extremely high and a large portion of the site is potentially surplus to requirements. An initial evaluation of options has established that a part of the site can be brought forward for residential uses, with the remainder being used for developing a new purpose built facility on-site. We are keen to meet with the local authority in order to work through the potential options and set the parameters for housing numbers and employment floorspace.

In our view, the site lends itself well to a mix of employment and residential uses with the introduction of residential schemes off Bullard Road and the established housing on Coleshill Road. Indeed, two recent residential schemes included properties formerly owned by LGC on Queens Road (Elms Lodge and Victoria House). It is considered that car parking and site security can be addressed and there is no barrier to delivering a mixed use scheme in accordance with the National Planning Policy Framework.

It should be remembered that the UK Government originally invested in Teddington to be a home to world class scientific facilities and this investment was partly funded through the release of land for residential development. This investment enabled the creation and maintenance of high technology employment in the borough which LGC require options to maintain in order to sustain state of the art facilities to attract and retain the required calibre of scientific talent. The Teddington site has a rich scientific heritage and reputation and imposing planning constraints can only place this at future risk.

In summary, a proportion of the site is no longer required by LGC, whilst the facility requires substantial modernisation and structural change. It is therefore proposed that a mixed use residential/employment allocation would allow LGC the opportunity to have a presence in the area for the longer term

We respectfully request that you acknowledge that these representations have been received and shall be formally considered as part of this consultation process. If you require anything else please do let me know.

Yours faithfully

A handwritten signature in black ink, appearing to read 'J.D. Stoddart'.

**JONATHAN STODDART**  
**DIRECTOR**



## Richmond upon Thames

### Data settings

	Housing Demand (units per 1,000 75+)	Current Market Split		2030 Market Split	
		Rent (%)	Sale (%)	Rent (%)	Sale (%)
Sheltered Housing	125	81%	19%	20%	80%
Enhanced Sheltered Housing	20	40%	60%	20%	80%
Extra Care - 24/7 support	25	100%	0%	20%	80%
Residential Care	65				
Nursing Care	45				

This section enables you to adjust any of the model assumptions that have been used to calculate the data tables. To change any of these assumptions, click on the + / - buttons or enter the desired value in the relevant boxes. You can use the reset buttons to reset these back to the preset assumptions stored.

The sources of the preset assumptions for each section are as follows:

*Housing Demand* is the number of units required per 1,000 of the population aged 75+. These are preset with prevalence rates from "More Choice, Greater Voice".












*Current Market Split* is the proportion of the supply in the area that is split between rent and leasehold. These are preset based on the supply data from Elderly Accommodation Counsel, national housing database 2014. All properties are allocated to the scheme's dominant tenure

*Future Market Split* is the estimate proportion of future supply that may be required by 2035. These are preset to the current market values from the section above. It is recommended that these figures are adjusted based on local knowledge / policy to take into account the increased number of owner occupiers across the country. (click below on Future market split for more guidance)

### More information

- [Data settings](#)
- [Commissioning strategies](#)
- [Future market split](#)

## Current Needs

	Demand	Supply	Variance	% Variance	
<b>Sheltered Housing</b>	<b>1,600</b>	<b>1,047</b>	<b>-553</b>	<b>-35%</b> 	
Sheltered Housing: Rent	1,296	852	-444	-34% 	
Sheltered Housing: Lease	304	195	-109	-36% 	
<b>Enhanced Sheltered</b>	<b>256</b>	<b>63</b>	<b>-193</b>	<b>-75%</b> 	
Enhanced Sheltered: Rent	102	25	-77	-76% 	
Enhanced Sheltered: Lease	154	38	-116	-75% 	
<b>Extra Care</b>	<b>320</b>	<b>82</b>	<b>-238</b>	<b>-74%</b> 	
Extra Care: Rent	320	82	-238	-74% 	
Extra Care: Lease	0	0	0		0%
<b>Registered Care</b>	<b>1,408</b>	<b>818</b>	<b>-590</b>	<b>-42%</b> 	
Residential Care	832	356	-476	-57% 	
Nursing Care	576	462	-114	-20% 	

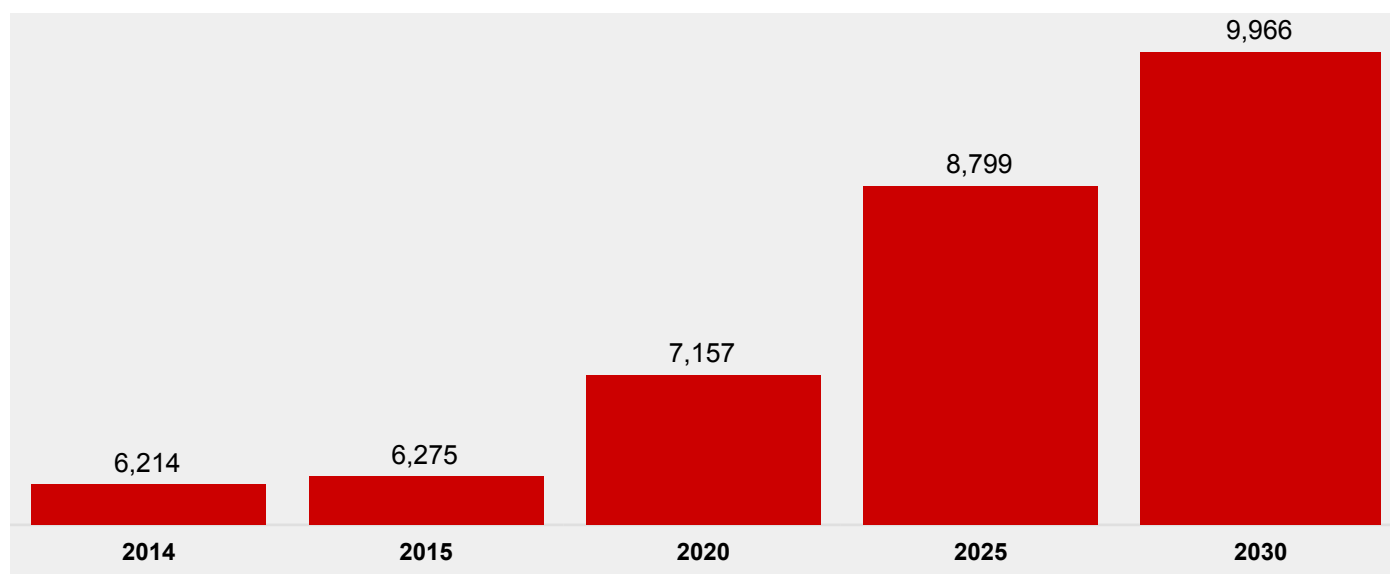
## Estimated Future Needs

	<b>2014</b> % increase from 2014	<b>2015</b> 2%	<b>2020</b> 16%	<b>2025</b> 43%	<b>2030</b> 62%	<b>2035</b> 83%
<b>Sheltered Housing</b>	<b>1,600</b>	<b>1,638</b>	<b>1,850</b>	<b>2,288</b>	<b>2,588</b>	<b>2,925</b>
Sheltered Housing: Rent	1,296	1,277	1,184	1,121	906	585
Sheltered Housing: Lease	304	360	666	1,167	1,682	2,340
<b>Enhanced Sheltered</b>	<b>256</b>	<b>262</b>	<b>296</b>	<b>366</b>	<b>414</b>	<b>468</b>
Enhanced Sheltered: Rent	102	102	101	110	104	94
Enhanced Sheltered: Lease	154	160	195	256	311	374
<b>Extra Care</b>	<b>320</b>	<b>328</b>	<b>370</b>	<b>458</b>	<b>518</b>	<b>585</b>
Extra Care: Rent	320	314	285	265	202	117
Extra Care: Lease	0	13	85	192	316	468
<b>Registered Care</b>	<b>1,408</b>	<b>1,441</b>	<b>1,628</b>	<b>2,013</b>	<b>2,277</b>	<b>2,574</b>
Residential Care	832	852	962	1,190	1,346	1,521
Nursing Care	576	590	666	824	932	1,053

# Older People Living Alone

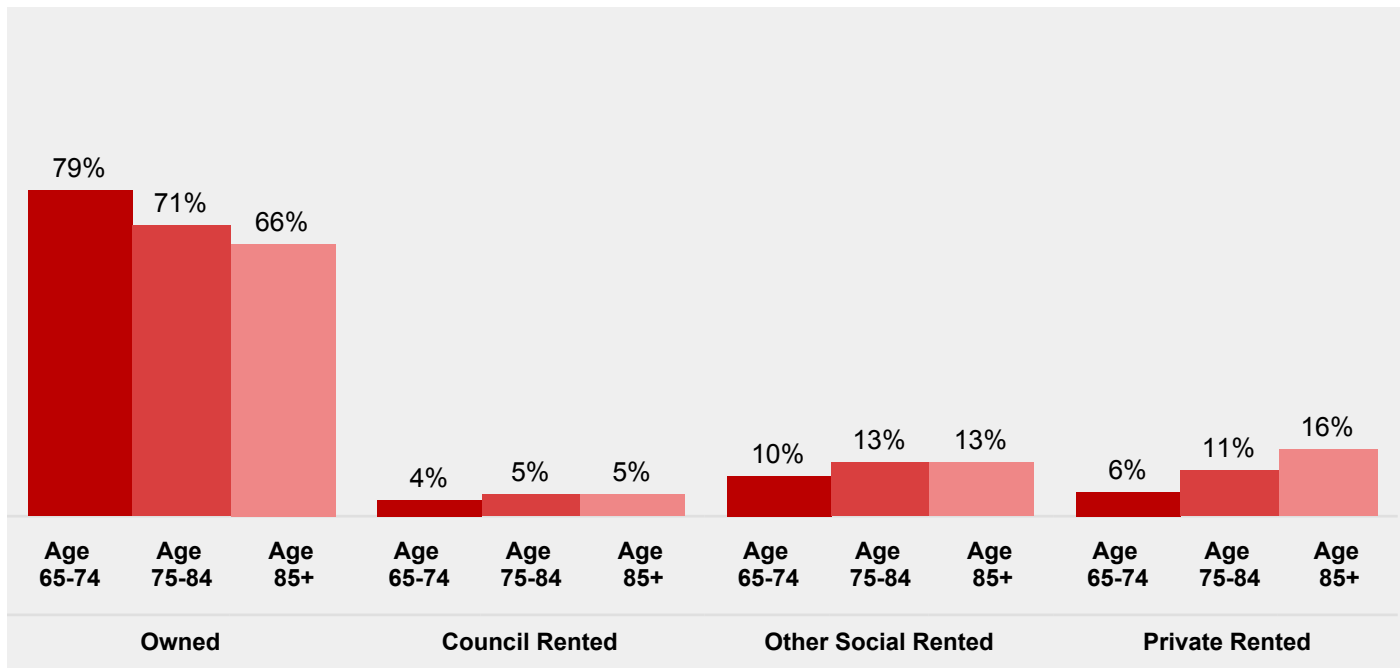
This information has not been updated with data from ONS release May 2014.

Older People Living Alone: Total



Year	People 75+	% Increase from 2014
2014	6,214	-
2015	6,275	1%
2020	7,157	15%
2025	8,799	42%
2030	9,966	60%

# Tenure of Older People



Housing Type	People 65-74	People 75-84	People 85+
Owned	79%	71%	66%
Council Rented	4%	5%	5%
Other Social Rented	10%	13%	13%
Private Rented	6%	11%	16%

# Appendix

## Current Needs

This section shows the estimated number of older people aged 75+ who are likely to require specialist housing or registered care (demand) against the current number of units available in each area (supply).

The data for demand is calculated by applying the prevalence rates (as shown in the data settings) to the 2012 population aged 75+. The population data used is from the May 2014 Office for National Statistics (ONS) sub-national population projections.

The data for supply is the current number of specialist housing and registered care beds from Elderly Accommodation Counsel, national housing database 2014. EAC's classifications are as follows:

*Sheltered housing:* Schemes / properties are included where some form of scheme manager (warden) service is provided on site on a regular basis but where no registered personal care is provided. A regularly visiting scheme manager service may qualify as long as s/he is available to all residents when on site. An on-call-only service does not qualify a scheme to be included in sheltered stats. In most cases schemes will also include traditional shared facilities - a residents' lounge and possibly laundry and garden.

*Enhanced sheltered housing:* Schemes / properties are included where service provision is higher than for sheltered housing but below extra care level. Typically there may be 24/7 staffing cover, at least one daily meal will be provided and there may be additional shared facilities.

*Extra care housing:* Schemes / properties are included where care (registered personal care) is available on site 24/7.

*Residential care:* Where a care homes is registered to provide residential (personal) care only, all beds are allocated to residential care.

*Nursing care:* Where a care homes is registered to provide nursing care all beds are allocated to nursing care, although in practice not all residents might be in need of or receiving nursing care.

## More information

- [Current needs](#)

## Estimated Future Needs

This section is a key component for organisations working on their Market Position Statements (MPSs), planning submissions and analysis of future housing and care needs of older people. It shows the estimated number of older people aged 75+ who are likely to require specialist housing or registered care in future years, from 2014 - 2035.

### Adjusting the Future market split:

The housing market split for rental and leasehold sectors for 2035 is set at the same percentage as the current level. It is accepted that the percentage of leasehold will increase in the future and this change will vary depending on whether the market is attractive to leasehold sales, i.e. areas of affluence will see a higher % increase in leaseholds by 2035.

There are no definitive figures for 2035 but one proposed suggestion is linked to the assumptions in "Housing in later life - planning ahead for specialist housing for older people" toolkit published in December 2012. It is suggested that users of SHOP@ consider the options on the attached chart and look at the results from scenarios using different percentages.

	More deprived locality		More affluent locality	
	Rented	Leashold	Rented	Leashold
Sheltered	50	50	33	67
Enhanced Sheltered	67	33	50	50
Extra Care	50	50	33	67

For more information on developing an MPS, go back to the Housing LIN/ADASS Strategic Housing for Older People Resource Pack, "Planning, designing and delivering housing that older people want" published in December 2011.

### More information

- [Estimated future needs](#)

## Older People Living Alone

This section shows the current and future estimated number of older people aged 75+ who are living alone. This section also contains an option for showing the number of older people who are living alone with a long-term illness.

This information is from POPPI (Projecting Older People Population Information.) Figures are taken from the General Household Survey 2007 table 3.4, Percentage of men and women living alone by age, ONS.

**The information has not been updated in the new SHOP@ release and therefore the figures should be treated with caution.**

**The information is not available for Welsh Authorities.**

### More information

- [Older people living alone](#)

## Tenure of Older People

This section shows the proportion of older people who are in different tenure types.

This information is from POPPI (Projecting Older People Population Information.) Figures are taken from ONS 2001 census, standard tables, table S017 tenure and age by general health and limiting long-term illness. The terms used to describe tenure are as follows:

*Owned*: either owned outright, owned with a mortgage or loan, or paying part rent and part mortgage (shared ownership).

*Other social rented*: includes rented from Registered Social Landlord, Housing association, Housing Co-operative and Charitable Trust.

*Private rented*: renting from a private landlord or letting agency, employer of a household member, or relative or friend of a household member or other person.

**This information has not been updated in the latest SHOP@ release and therefore the figures**



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**should be treated with caution.**

**The information is not available for Welsh Authorities.**

### **More information**

- Tenure of older people

### **Disclaimer**

The information provided within this tool is drawn from national and sub national statistics and calculates future need based on assumptions in publicly available national reports. Further assessment and investigation may be required to consider specific local conditions and opportunities. Any interpretation of the data will be solely the responsibility of the user organisation with no responsibility or liability attached to the authors of this analysis tool.

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## Appendix A

### Background

Metro Bank is Britain's first new retail bank in over 100 years, providing retail and commercial banking services. Metro Bank may at first appear to be similar to any other bank in terms of its services and offering. However, it is in the very clearly differentiated retail banking concept that sets it apart from its competitors.

Metro Bank floated on the stock market in March 2016<sup>1</sup> and joined the FTSE 250 in June. This achievement demonstrates the growth of the business as the UK's leading challenger bank.

Metro Bank has seen record growth for a retail bank. Highlights from Q3 2016 include:

- Total deposits up 66% year on year to £7,297m
- Lending up 73%, year on year to £5,193m
- Record 68,000 increase in customer accounts to a total of 848,000
- Underlying profit before tax at £0.6m (compared to a £3.4m loss in Q2 2016)<sup>2</sup>.

### Accolades

The success of Metro Bank in meeting consumer choice and customer needs is reflected by the direct praise from clients, customers, investors and real economic impact. Metro Bank has the following recent accolades<sup>3</sup>:

- **Bank of the Year**, awarded by City AM Awards 2016;
- **"Winner of the Most Trusted: Financial Provider, Current Account Provider (for the 2nd year running), Savings and Cash ISA Provider; Best Current Account Provider for Branch Service (for the 2nd year running) and the Best Provider of Children's Saving Account"** at the prestigious Moneywise Customer Service Awards in June 2016. Metro Bank were also highly commended for "Best Current Account Provider for Call Centre Service and Best Currently Account Mobile App";
- **Craig Donaldson (CEO of Metro Bank)** was rated as one of the highest rated CEO in the UK, by the job review site Glassdoor (June 2016), with a 99% approval rating;
- **"Financial Services Award for Outstanding Business Achievement"** at Microsoft's EMEA Visionary Awards which recognises the most innovative financial services organisation in the EMEA region (December 2015)<sup>4</sup>;
- **"Metro Bank is identified in the London Stock Exchange's '1000 Companies to Inspire Britain'"**, the report is a celebration of the UK's fastest growing and most dynamic businesses in the UK;
- **"Family Friendly Gold Award"** by MumsNet for its inclusive services provided for families, including the spacious layout of its stores, its Metro Money Zone financial education programme which forms part of its 'Kids Rock!' ethos, and its approach to flexible working for colleagues;
- **800 – 1,400 new accounts** opened per store per month across the store portfolio;

<sup>1</sup> Metro Bank Joins London Stock Exchange (<https://www.metrobankonline.co.uk/about-us/press-releases/news/metro-bank-joins-london-stock-exchange/>) Accessed 6 October 2016.

<sup>2</sup> Metro Bank reports 66% growth in deposits and first underlying profit (<https://www.metrobankonline.co.uk/about-us/press-releases/news/metro-bank-reports-66-growth-in-deposits-and-first-underlying-profit/>) Accessed 8 December 2016.

<sup>3</sup> Metro Bank Awards (<https://www.metrobankonline.co.uk/about-us/awards/>) Accessed 8 December 2016

<sup>4</sup> Microsoft names Metro Bank the most innovative in Europe (<https://www.metrobankonline.co.uk/about-us/press-releases/news/microsoft-names-metro-bank-the-most-innovative-in-europe/>) Accessed 6 October 2016

- **Over 2,500 new jobs** created by Metro Bank since opening its first store in 2010<sup>5</sup>; and
- **Customer accounts surpass 900,000**<sup>6</sup>

### The Metro Bank Concept

The concept of Metro Bank is as a retailer, rather than a bank, with an emphasis on excellent customer service and not, as traditional banks are set up, on selling financial products. Other retail characteristics are explained below:

- Longer and more convenient opening hours for customers with unparalleled levels of service. Opening hours reflect retailers with late openings and will comprise of:
  - 362 days a year;
  - 7 days a week;
  - 8am to 8pm Monday to Friday;
  - 8am to 6pm Saturday; and
  - 11am to 5pm Sunday and Bank holidays<sup>7</sup>.
- Metro Bank meets the needs of commuters before and after work especially as the Site is in close proximity to public transport links.
- All stores have three shifts that cross over during lunchtime and late afternoon, to ensure a high quality service is maintained when the bank is busiest for customers who are traditionally time short during the lunch break.
- New bank accounts can be opened within 15 minutes with debit cards, credit cards and cheque books all printed immediately.
- Further, lost or stolen cards or cheque books can be replaced in store immediately within 5 minutes, customers can also apply for loans in-store, with decisions made in store.
- The Magic Money machine counting facility allows customers and non-customers (of all ages) to change their coins for free with no commission and provides for a community service.
- The provision of safety deposit boxes in store, which are very popular, and yet are no longer provided in high street banks.

These measures all drive footfall in a way that a traditional A1 retailer might, but a traditional bank would not. Metro Bank's footfall sees an average number of new accounts opened per store per month is 800 rising to 1,400 across the portfolio.

### Metro Bank Stores and Brand

Metro Bank seeks to open high quality stores in prominent locations across London and around the South East. To date Metro Bank has 46 stores open across London and the South East, with an ambition of having up to 110 stores by 2020<sup>8</sup>.

Metro Bank has the following brand requirements:

- preference for high proportions of glazed (double height) shop front in order to configure the store to allow more visibility to the various services (ATMs, magic money machine, safety deposit boxes) which adds to the overall transparency of the business;

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<sup>5</sup> Metro Bank Celebrates growth with 500 new jobs. <https://www.metrobankonline.co.uk/about-us/press-releases/news/metro-bank-celebrates-growth-with-500-new-jobs/> Accessed 25 January 2017

<sup>6</sup> Metro Bank Celebrates growth with 500 new jobs. <https://www.metrobankonline.co.uk/about-us/press-releases/news/metro-bank-celebrates-growth-with-500-new-jobs/> Accessed 25 January 2017

<sup>7</sup> <https://www.metrobankonline.co.uk/> Accessed 8 December 2016

<sup>8</sup> Metro Bank raises £400 million (<https://www.metrobankonline.co.uk/about-us/press-releases/news/metro-bank-raises-400-million/>) Accessed 6 October 2016

- prominent, corner positions close to transport interchanges with high footfall to draw on passing trade and connect with the customers travel to work routes with the convenience of a store located close to both home and work;
- minimum back of office space to ensure store is customer facing; and,
- the store has sufficient space to allow community events to be held including the likes of Chamber of Commerce meetings and presentations and visits from school children as part of the Money Zone programme, a programme initiated to give children an understanding of the basic principles of money, saving and banking in an engaging and fun way.

### Design and Occupier Requirements

Typically Metro Bank take 25 year leases<sup>9</sup> on the premises their stores are located in. This is the preference due to the high level of investment which is required to return the building to a full state of repair and also to fit out the building to their high quality standard fit out.

- Approximately £3m is invested per store on average for the high quality fit out (in this case this figure will be higher due to the redevelopment of the site);
- High quality fit out and strong attention to detail;
- Each store individually designed;
- No glass between customers and bank tellers;
- Open design to allow community events when bank is operational;
- Double height to create light and space; and,
- External materials designed for easy cleaning, retaining quality, low maintenance and easily replaced if damaged to ensure a high quality finish.

### Metro Bank in the Community

The Metro Bank model is one which is offering a simple and basic retail bank for local communities. Unlike many other financial institutions, Metro Bank will offer predominantly retail banking and business services. The banking business model is aimed at local customers and local small/medium enterprises. It is not an investment bank (i.e. no share dealing or investment banking).

- Metro Bank actively employ staff from the local community – a banking background is not required, instead preferring staff to have a retail experience with on the job training for banking;
- Metro Bank hosts over 100 events per month with local businesses, Chambers of Commerce, Town Centre Managers, charities and schools;
- Unlike other UK banks, the store managers at Metro Bank can make credit and loan decisions in-store, therefore lending directly into the local community;
- Since opening in 2010 Metro Bank has employed more than 2,000 people. As the bank continues to grow, it is creating hundreds of jobs for local people, a plan which has been lauded by the Government; and,
- Metro Bank support local communities near its stores, with 1,674 community and business events occurring during 2015 alone<sup>10</sup>.

Metro Bank safeguards its customers by lending no more than 70% of its deposit book, ensuring it remains financially stable, reliable and grows organically in a sustained way.

The ethos and culture of the proposed open layout is to promote better relationships with employees and customers and providing a platform for community engagement and host events as described above.

<sup>9</sup> Metro Bank Store Requirement Flyer April 2016

<sup>10</sup> Metro Bank, At the heart of the community (<https://www.metrobankonline.co.uk/about-us/our-people/>) Accessed 6 October 2016

Metro Bank operates a financial education programme called Magic Money Zone through its stores, which has so far helped to educate over 21,000 children during 2015 across schools in London and the South East<sup>11</sup>.

Each store provides free toilets and children changing facilities that can be used by all members of the public irrespective whether they bank with Metro Bank.

### Job Creation

In regard to employment opportunities, Metro Bank employs more staff than the equivalent size of traditional high street bank or retailer. Metro Bank specifically employs staff from the local community. Approximately a third of staff has previous bank experience, whilst the remainder are trained on the job but with a customer facing attitude. A recruitment drive is advertised in the local area well in advance of a new store opening with at least 50% of employees coming from the local community. Job creation would be in the region of 25 full time members of staff within the Strand store.

By comparison, most other banks (where properties are half the size of a Metro Bank store), staff numbers will be between 10-14 full-time equivalent, with opening hours of 9am-5pm Monday-Friday with some open for a few hours on Saturday.

Metro Bank recently announced that it is seeking 500 new colleagues to support its rapid growth, with plans to open a further 12 brand new stores during 2017.<sup>12</sup>

Employment opportunities at Metro Bank create genuine long term career prospects through progressive jobs, whereby new store opportunities are firstly sought to be promoted internally, rather than advertised externally. Indeed, bringing employees through the company from shop floor to management is a fundamental part of the business growth strategy.

### Commitment to the High Street

The applicant has a strong track record of providing these improvements and delivering the positive characteristics required by modern retailers and the modern shopping environment. Metro Bank firmly believes that a strong level of customer service goes hand-in-hand with a high-quality retail environment and experience.

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<sup>11</sup> Kids Zone (<https://www.metrobankonline.co.uk/about-us/kids-zone/>) Accessed 6 October 2016

<sup>12</sup> Metro Bank Celebrates growth with 500 new jobs. <https://www.metrobankonline.co.uk/about-us/press-releases/news/metro-bank-celebrates-growth-with-500-new-jobs/> Accessed 25 January 2017

**To**  
Planning Policy

**Organisation**  
London Borough of Richmond  
Upon Thames

**Date**  
15 February 2017

**Summary of Representations: Consultation on final version of the Local Plan from 4 January to 15 February 2017**

I write in relation to the consultation in respect of the Council's final draft local development plan, in particular as it pertains to Mortlake's Stag Brewery (Site Allocation 24).

**1. BACKGROUND**

I am a resident of Williams Lane and live adjacent to the Stag Brewery site. I acquired the property on construction in December 2011, after publication of the 2011 APB referenced below and the public consultation which that followed. I made the purchase in reliance upon those plans, albeit recognising that the final details of any planning consent would need to be ironed out at the relevant time. Significant to this decision was the site of the proposed primary school, given the Borough's extreme shortage of primary education.

The location of the Williams Lane and Trinity Mews residences is set out in the Indicative Plan (referred to below) as 'Approved residential development'; the development on Williams Lane and Wadham Mews was completed in 2012 and is referred to in this summary and my representations as the *Trinity Mews Development*. It can be seen to the north-west of the Site in the picture shown at page 5 [here](#).

I have had the benefit of discussing recently the matters raised in this summary with 10 other homeowners on the Trinity Mews Development. I believe the position stated accurately reflects the standpoint of those residents, subject of course to any contrary opinions they may themselves put forward as part of this process, either directly or through the Mortlake Brewery Community Group or any other organisation. Furthermore, the key points made in the representations have also been communicated to the management committee for proprietors and tenants of the c. 63 flats on the Trinity Mews Development. I have received support for the positions stated herein; no-one has opposed it.

The presence of the Trinity Mews Development and the views of the Trinity Mews Development residents should properly be taken into account when formulating any revisions to the Site use. The proposed development, if insensitively pursued as appears inevitable from the Draft Local Plan, could blight the lives of the residents both during the construction phase and for years to come.

In this summary and the representations, I have used the following terms:

- (a) *"Draft Local Plan"* means the 'Council's Local Plan' on which consultation responses are presently sought, found in redline against the previous version at

[http://www.richmond.gov.uk/combined\\_local\\_plan\\_publication\\_tracked\\_changes\\_after\\_cabinet.pdf](http://www.richmond.gov.uk/combined_local_plan_publication_tracked_changes_after_cabinet.pdf); and

- (b) “*Site*” means the Stag Brewery site the subject of Site Allocation 24 in the Draft Local Plan’
- (c) “*2011 APB*”, the document entitled ‘Supplementary Planning Document Stag Brewery, Mortlake, SW14 Planning Brief Adopted July 2011’ – found at [http://www.richmond.gov.uk/stag\\_brewery\\_2010-2.pdf](http://www.richmond.gov.uk/stag_brewery_2010-2.pdf).

Finally, I refer to the pre-consultation scoping exercise in relation to the village plans carried out in January 2016, my responses thereto (my *Pre-Consultation Responses*) – accompanying this summary for reference – and your short-form responses on those (*RBC Pre-Consultation Response Comments*).

## 2. SUMMARY OF POSITION

- 2.1 In my Pre-Consultation Responses, I reiterated that residents had (literally) bought into the opportunity to create a new village heart for Mortlake. One that would cater for existing and new communities alike, across a range of facilities and uses designed to promote Mortlake to the fullest extent possible. That vision was set out clearly in the 2011 APB.
- 2.2 I also highlighted a number of issues with the Council’s proposal in late 2015, without public consultation, to establish a six-form entry secondary school, plus sixth form, on the Site instead of the much-needed primary school contemplated by the 2011 APB. I alluded to a number of substantive and procedural issues with these proposals and recommended that further plans incorporate a primary school (as approved in the 2011 APB), at least in the alternative to avoid the Council progressing (at taxpayers’ expense) on the basis of an unworkable, and non-compliant, draft local plan.
- 2.3 These issues were not properly addressed in the RBC Pre-Consultation Response Comments, nor in the subsequent pre-consultation draft local plan which continued to provide – in abstract terms only – for a large secondary school in place of a primary school. This simply does not work, and there are alternatives.
- 2.4 The final Draft Local Plan made available in January of this year also now contemplates (for the first time) the ‘reprovision’ of the playing fields that form an intrinsic part of the Site. Those playing fields were expressly protected by the 2011 APB and are of special local and historical importance. There is no commentary in the Draft Local Plan explaining this, however we understand it may be to accommodate the secondary school referred to above. The playing fields must continue to be protected.
- 2.5 **For the reasons that follow, and set out in much further detail in my full representations, I am firmly of the view that the Council has erred, in process and substance, in reaching the conclusions it appears to have reached in formulating SA 24 of the Local Plan for Mortlake. It is not legally compliant and it is unsound.**



- 2.6 I also have material reservations as to whether or not the Council has complied properly with the duty to co-operate. A number of organisations have clear views on the proposal to remove the playing fields, for instance. I would also expect TfL to have strong views on the deliverability of the scheme in light of what that would entail by way of material improvements to public transport and the road network. In any event, the degree of co-operation with the local community contemplated by the National Planning Policy Framework has not been met.
- 2.7 The residents of the Trinity Mews Development would like to be in a position to examine these issues against concrete land-use proposals from the developer and/or the Council. The Council has asserted a requirement for a large secondary school, without giving any evidence to the community or (publically) the developer as to how this might be accommodated. The developer's own plans are expected to be made known to the community – despite repeated requests for earlier engagement since the land was acquired – only next month, in March 2017, after the closure of the Local Plan consultation. This is not acceptable. Nonetheless, I can but make these representations on the basis of the facts and generic statements as presently known to me.
- 2.8 Once proper information is provided by the relevant authorities and the developer, we intend to seek expert legal counsel's advice in relation to the processes as conducted to date and, should we be so advised, to pursue one or more claims for judicial review of the Council's decision-making processes and the resultant decisions. We would also strongly recommend the Council either drops the offending provisions of the Local Plan, or at least progresses the Local Plan in the alternative (i.e. with a primary school, retained playing fields and substantially low density housing), until such legal issues are resolved to avoid additional delay to the scheme and cost to taxpayers. **We fervently wish to see a sensible plan progress.**
- 2.9 Pending this, we expressly reserve all rights and invite the Inspector to take the lead on recognising that what is currently proposed falls a long way short of the procedural steps necessary to incorporate the proposal within the Draft Local Plan but, more importantly, is simply unworkable in its present form.

### **3. REQUIREMENT FOR A SECONDARY SCHOOL ON THE SITE**

- 3.1 Representation 2 relates to the 'clear need' (according to the Draft Local Plan) for a large secondary school on the Site. This has certainly not been made out, neither at the time the Cabinet adopted the updated School Place Planning Strategy in 2015, nor subsequently.
- 3.2 The School Place Planning Strategy offers scant insight into how the Cabinet concluded the Site would need to house a large secondary school, plus sixth form. (In fact, it doesn't refer to a sixth form at all – the Draft Local Plan appears to have made that up).
- 3.3 It sets out, based on recent historical demographic information, how there will likely be a need for new places over the course of the medium-to-long term in the eastern part of the Borough.

- 3.4 It then jumps, without analysis, to a conclusion that the Site is the only place a new large secondary school can be accommodated. In so doing, it:
- (a) disregards the possibility of two or three smaller schools, on different sites, meeting the perceived shortfall in places – it is obvious that the number of sites big enough to accommodate a school for up to 1,500 pupils and staff will be limited, yet the Education Funding Agency’s remit appears to have covered only larger site capacity;
  - (b) disregards other sites, with *prima facie* better attributes, which are or may become available – why?;
  - (c) acknowledges the need to consider (i) availability of places outside the Borough and (ii) expansion of existing schools – but then fails to do that: the Local Plan cannot be adopted whilst this further pre-conditional analysis is acknowledged to be outstanding;
  - (d) disregards the equally pressing need for a primary school in the local area which the 2011 APD provided for;
  - (e) creates an artificial distinction between the eastern and western parts of the Borough and preventing children travelling an artificial, and in national terms rather short, 6 miles to school – the Education Act 1996, from which the requirement to provide education is derived – makes no such distinction and there are clear, practical reasons to avoid making such a distinction;
  - (f) crucially, offers no analysis as to the consequences of the decision, principally how it could be delivered alongside the competing requirements of the 2011 APB more generally, but in particular in relation to traffic circulation and access – the Sustainability Appraisal Report is testimony to this; and
  - (g) seems to disregard the fact that emissions of noxious gases adjacent to the Site already exceed legal or recommended safe levels, and that will be exacerbated in any event by the new development: does the Council really want our children, and its staff, to spend the majority of their waking hours in a known pollution hotspot? To do so would be gross negligence, at a minimum.
- 3.5 In my representations, I identify a number of other legal issues with that decision. But it is worth noting that, according to the minutes of that Cabinet meeting, it lasted just 17 minutes. Just 17 minutes to reach a conclusion of significant local importance and which in essence reverses a key component of the (heavily consulted upon) 2011 APB. And that was 17 minutes in total to resolve not just on this issue, but also some twelve other issues on the agenda that night. If that was truly the case, no wonder such an unworkable proposal was the outcome.
- 3.6 Notwithstanding the purported adoption by the Cabinet of that policy, it is in any event not appropriate for the Council planning department to ‘rubber-stamp’ the Cabinet decision which was based on primarily on matters of education policy. The Draft Local Plan is a planning document contemplated by statute, the production of which needs to meet a number

of procedural and substantive criteria, including under the National Planning Policy Framework. Underpinning that document should be an impartial and balanced assessment of the impact of a proposal, of the deliverability and sustainability of a proposal, based on proportionate evidence. Simply to rely on the School Place Planning Strategy – with all the inherent weaknesses mentioned above – as the principal and only evidence that a planning decision is appropriate, is a dereliction of duty. The Sustainability Appraisal Report in its present form, as it relates to SA 24, demonstrates that the Council does not have a handle on all the important issues at stake. We, the local community, do.

- 3.7 But the crux of the issue is this: the entire vision for Mortlake set out in the 2011 APB<sup>1</sup> will be jeopardised if this is allowed to proceed. There is finite space on the Site. The 2011 APB itself represented a compromise between the Council, the local community and other stakeholders. Seeking to replace a small primary school with a large secondary school on the site will inevitably curtail the ability of the developer to deliver what everyone had agreed should be delivered after that compromise. The result will be that important aspects of the 2011 APB are lost, or are pigeon-holed into spaces not fit for purpose, whilst the local community suffers the negative effects of a large secondary school in an area with limited access and high levels of pollution. Add to that the ‘reprovision’ of the playing fields, proposed very late in the day (i.e. just a month ago). For all the technical arguments against adopting the Local Plan in its present form – and these are with real merit here – losing the ability to deliver a sensible, sustainable plan with local support, is what the community is not willing to see happen.
- 3.8 The Draft Local Plan purports to safeguard the aims of the 2011 APB, but offers no guidance as to whether or how this can be achieved in light of the proposal for a large secondary school. There can, as a matter of substance, be no consultation on a matter so abstract to the extent it is inconceivable. Contrast this with the 2011 APB consultation which included a series of questionnaires and presentations on the back of four alternative concrete land-use and density proposals, and it is apparent how this purported consultation falls short of legal requirements, including the legitimate expectation of the same this time around – which cannot take place if the Local Plan is adopted in its present form. The Council is in any event under a duty to co-operate with the local community in formulating a Local Plan, but cannot for the last twelve months be said to have done anything other than disregard, and even frustrate, the well-voiced views of the community.

#### **4. RESIDENTIAL HOUSING**

- 4.1 Representation 3 relates to residential housing capacity. The Local Plan does not address residential housing capacity on the Site. There is an opportunity to give the developer a clear steer on this and, consequently, on what space is available for other commercial and community uses.

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<sup>1</sup> “...based on the desire to provide a new village heart for Mortlake based upon buildings and open public realm of the highest quality that will radically transform Mortlake whilst respecting the character and history of the area. The site should provide a new recreational and living quarter with a mix of uses, creating vibrant links between the River and the town, and enlivening the Riverside frontage and Mortlake High Street, fully realising this unique opportunity for the Mortlake community”

- 4.2 The Draft Local Plan does, however, expressly adopt the 2011 APB, which made a number of conclusions as to housing densities and site layout – for instance, to keep taller buildings to the existing footprint and to ensure buildings at the north-western part of the Site do not exceed two-to-three stories.
- 4.3 Furthermore, the Council, in its responses to earlier consultation rounds, re-affirmed the latest Authority’s Monitoring Report on Housing, which provided for an estimate of 200 to 300 dwellings in total.
- 4.4 The Council is invited to expressly re-affirm these limits, subject to downward revision to the extent necessary to accommodate any change the Council requires from a primary school to a secondary school. If there is ultimately a secondary school, any reduction in space must come from residential housing (pro rata across affordable and other housing).

## **5. PLAYING FIELDS**

- 5.1 Representation 4 relates to the reference in the Draft Local Plan to the ‘reprovision’ of the playing fields. Re-provision is undefined, and unexplained, but (i) appears impossible to achieve on the Site and (ii) if that is the case, is akin to removal of the playing fields. This despite the 2011 APB expressly committing to protect them.
- 5.2 There are a number of issues with this. Perhaps first and foremost, they are a valued green space where green spaces are of a premium. Ask Barnes Eagles football club who use them for home games. Or Thomson House school whose pupils do not otherwise have access to playing fields. Or any number of local residents who look on to or pass them frequently. They also have historical importance – England’s only World Cup winning football team I understand trained there. And not to mention that they are home to a variety of flora and fauna which interact with local and riverside eco-systems.
- 5.3 From a procedural perspective, there are also a number of further issues this raises:
  - (a) there is a pending application for Local Green Space designation, which the Local Plan should be acknowledging and expressly accepting;
  - (b) trees on the playing fields are the subject of one or more tree preservation orders;
  - (c) key users have not been consulted, including Sport England and Barnes Eagles football club; and
  - (d) this is a green field space, which the National Policy Planning Framework seeks to require local authorities to protect in Local Plans.

## **6. CONCLUSION**

- 6.1 There remains a fantastic opportunity to develop the Site in accordance with the aims of the 2011 APB. My understanding is that that plan, including the indicative site plan from the 2011 APB, would continue to be supported by a significant majority of local stakeholders for whom this is a significant issue. That plan was and should remain the ‘Plan A’, which will deliver sustainable development for Mortlake and the wider Richmond Borough.

- 6.2 Residents entirely recognise that the Council faces competing demands requiring an analysis of complex facts and difficult decisions – although they would like to see evidence that the Council has properly undertaken that analysis. They even acknowledge that – in some shape or form – secondary education places will be required in the Borough at some point over the medium to long term. However, that does not mean we should collectively accept what is quite clearly a sub-optimal solution here when one gets into the detail. It is using a sledgehammer to crack a nut. And it most certainly does not mean that sub-optimal solutions should be accepted where due process and the principles of natural justice and legitimate expectation have not been followed.

\* \* \*

Mr. and Mrs. M. R. Millington

### **Summary of representations**

<b>1. National Planning Policy Framework and Sustainability Appraisal Report</b>	
A	Non-compliance with National Planning Policy Framework: playing fields
B	Non-compliance with National Planning Policy Framework: secondary school
C	Sustainability Appraisal Report inadequate as regards SA 24
<b>2. Requirement for a large secondary school on the Site</b>	
A	Will not allow overarching aims for the Site and the 2011 adopted planning brief to be implemented.
B	Will have a disproportionate impact on the local community
C	Inadequate consideration of consequences of such a requirement
D	Procedural irregularity: failure to consult in same degree of detail as 2011 adopted planning brief
E	Need for a secondary school on the Site not made out as a matter of law or fact, including failure to comply legally: multiple bases
<b>3. Housing</b>	
	Local Plan to clarify expectations for residential units based on 2011 development brief findings, so as to ensure competing uses for the site are not jeopardised
<b>4. Playing fields 'reprovision'</b>	
A	Re-provision on Site not feasible; removal would be inconsistent with strategic objectives of the Local Plan
B	Removal of trees the subject of an extant tree preservation order
C	Removal would be prohibited following designation (application pending) as a Local Green Space





## Location

Stag Brewery is located in a highly sought after location on the banks of the River Thames, between Kew and Barnes, within the picturesque and affluent residential area of Mortlake, South West London.

Central London is approximately seven miles from the site and is easily accessible via car or public transport.

Richmond town centre is 2 miles to the west providing a variety of high street retailers, boutiques, galleries and designer shops. There are also many wine bars, pubs and cafes, as well as cinemas and Richmond Theatre.

This part of South West London has an abundance of green open space, with Richmond Park, Kew Gardens and Barnes Common all within close proximity.

Mortlake and the brewery itself is also well known as being the location of the finish line of the Oxford and Cambridge Boat Race. The riverside on this part of the Thames is pedestrianised and provides a number of local riverside pubs, including The Ship, directly adjacent to the site.

*A highly sought after location on the banks of the River Thames.*





## Summary of representations

<b>1. National Planning Policy Framework and Sustainability Appraisal Report</b>	
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B	Non-compliance with National Planning Policy Framework: secondary school
C	Sustainability Appraisal Report inadequate as regards SA 24; incompatible with EU directive
<b>2. Requirement for a large secondary school on the Site</b>	
A	Will not allow overarching aims for the Site and the 2011 adopted planning brief to be implemented.
B	Will have a disproportionate impact on the local community
C	Inadequate consideration of consequences of such a requirement
D	Procedural irregularity: failure to consult in same degree of detail as 2011 adopted planning brief
E	Need for a secondary school on the Site not made out as a matter of law or fact, including failure to comply legally
<b>3. Housing</b>	
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C	Removal would be prohibited following designation (application pending) as a Local Green Space

## Rep 1A - Non-compliance with National Planning Policy Framework: re-provision of playing fields

### Draft Local Plan provisions:

The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) refers to 'the retention and/or reprovision and upgrading of the playing field'.

Issue: 'Reprovision' is undefined. However, any strategy which removes the playing fields from the Site altogether would be inconsistent with the requirements and policies of the National Planning Policy Framework.

Detail: The playing fields represent a significant portion of the site, measuring approximately two hectares. For reference, refer to page 5 of the following site marketing document (copyright acknowledged):

<https://www.geraldeve.com/wp-content/uploads/2015/08/Stag-Brewery-Mortlake-Brochure.pdf>

They house two playing fields. Those playing fields are enjoyed by many local residents and sports groups (such as Barnes Eagles) for sports activities, as well as affording residents an attractive green space. Other organisations also use the space during the week: for instance, they are used by the local primary school (Thomson House) which does not have a playing field and by the police to train dogs.

The playing fields have been a green space, special for many reasons, for as long as any local residents can remember.

At the north- western, north-eastern and southern boundaries of the playing fields a number of trees. Those trees are, I understand, the subject of a tree preservation order, details of which can be provided on request by Mortlake Brewery Community Group.

As well as being used by local residents, the playing fields are also home to a wide variety of animals, including foxes, parakeets and storks.

Indeed, such is the importance of the playing fields to the Site and the local area, that the Council saw fit, after a full statutory consultation process, to protect them for generations to come when adopting the 2011 APB.

The Draft Local Plan, in seeking to include 'reprovision', could be construed as reversing that protection. The Council has offered no explanation for the basis on which that would be consistent with the requirements of the NPPF, or the overarching principles stated in the Draft Local Plan.

### **Local Green Space designation**

In order to formalise that protection, an application has been made by letter dated on or about 14 February 2017 to designate the playing fields as a Local Green Space pursuant to the National Planning Policy Framework. There appears to be a *prima facie* strong case for the playing fields to receive that designation, for the reasons set out in the letter.

As per section 1.1.5 of the Draft Local Plan, and at paragraph 76 of the NPPF, councils must take into account the National Planning Policy Framework when formulating the Local Plan; by designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.

As such, if that application is successful, as it is expected to be, it would not be possible to re-provide for the playing fields elsewhere. The reference to 'and/or re-provision' must be deleted (or made subject to the pending Local Green Space application) to avoid direct conflict with the requirements of the NPPF.

### **Community engagement**

Para. 150 of the NPPF provides that, '*Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities.*'

It continues, at para. 155 of the NPPF '*Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.*'

The NPPF finally goes on to state, at para. 157, '*Crucially, Local Plans should ... be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations.*'

The Council has failed to engage with, and take in to due (if any) account, the clearly expressed views of the local community. Not only do the Council's consultation materials offer no evidence as to community support for the proposal to remove or re-provision the playing fields, they disregard:

(i) the conclusions of the statutory consultation process which resulted in the adoption of the 2011 APB, which was that the playing fields should be retained and protected; and

(ii) frequently and strongly expressed views by residents of properties adjacent to the playing fields and local representative groups, such as the Mortlake Brewery Community Group.

Furthermore, I understand (but have not verified) that Barnes Eagles football club and Sport England feel strongly on this issue, but have not been approached by the Council for consultation.

### **Impact on environment: impact on air quality**

Para. 154 of the NPPF requires Local Plans to be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.

It continues to state, at para. 156, that '*Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to develop..*

*climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.*'

Para. 157 states, 'Crucially, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and sup

Para. 109 states that, '*The planning system should contribute to and enhance the natural and local environment by ... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.*'

Further, at para. 110, it states: '*In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.*'

The playing fields are situated immediately adjacent to the Lower Richmond Road. Recent studies showed that this particular area, especially at Chalker's Corner (approx. 0.3km away), suffers from being one of the worst areas in London for air pollution.

Furthermore, it was identified as being a Council 'Air Quality Focus Area', such was the acknowledged poor level of air pollution and the potential for improvement.

The proposed 'reprovision' of the playing fields is strongly at odds with the Council's duties under the NPPF for two reasons. First, it by removing the playing fields, and the trees on that part of the Site, there will be a removal of the vegetation that mitigates the harmful effects of vehicular transport. Furthermore, and more significantly, the Council plans are widely expected to propose the establishment of a secondary school which will inevitably bring a further 1,400 people daily along this stretch of road and consequently slow other traffic in the area.

Does the Council seriously intend to site a secondary school for the Borough's children, and its staff, to both of whom they owe a duty of care, in the midst of a known pollution hotspot, which will become materially worse, when other options exist? If they do so, they do so with blood on their hands and a stream of litigation to follow for years to come, for which the Council, and individual Councillors, will be held responsible. But for present purposes, to do so would be an incontrovertible breach of para. 109 of the NPPF.

### **Impact on environment: failure to protect green space / impact on natural environment**

The aforementioned provisions of paragraphs 154, 156, 157, 109 and 110 are equally of relevant here.

Furthermore, para. 100 of the NPPF states that:

*'The planning system should contribute to and enhance the natural and local environment by:*

- *protecting and enhancing valued landscapes, geological conservation interests and soils;*
- *recognising the wider benefits of ecosystem services;*
- *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;...*

Para. 111 then states that, *'Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.'*

The playing fields are a greenfield site, and of high environmental importance. Planning policy must not seek to require development of such a site.

Further, to do so would prejudice the local eco-systems, which interact with those of the river just c.100m away.

To the contrary, the Local Plan should be actively seeking to promote the conservation of such sites. Accordingly, the Draft Local Plan should be amended to expressly provide for the protection of the playing fields.

#### **Rep 1B - Non-compliance with National Planning Policy Framework: impact of requiring six-form entry, plus sixth form, secondary school**

##### **"Secondary Educational Uses"**

The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) states that 'The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required'. It also states that 'Appropriate uses, in addition to educational, include...'.

Bullet point 4 below that box goes on to state that 'There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.'

##### **"Other Uses"**

The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) provides for 'a new village heart and centre for Mortlake'. It goes on to provide for a variety of intended uses, including residential, employment, health, community and social infrastructure facilities, sport and leisure uses. It also indicates that 'high quality open spaces and public realm' should be incorporated.

Bullet point 1 below the that box states 'The Council has produced and adopted a development brief in 2011 for the site, which sets out the vision for redevelopment and provides guidance on the site's characteristics, constraints, land use and development opportunities.'

##### **Issue:**

In providing for the requirement of a new six-form entry, plus sixth form, secondary school to be included on the Site, due account has not been taken of the requirements and policies comprised in the National Planning Policy Framework.

##### **Detail:**

The 2011 APB contemplated the provision, in the location set out in Appendix A thereto, of a two-form entry primary school. The Draft Local Plan, directly and indirectly through reference to the Council's School Place Planning Strategy and the Mortlake Village Planning Guidance SPD, seeks to replace that primary school (without consultation) with a secondary school.

A detailed consultation process, on the back of a myriad of studies, preceded the adoption of the 2011 APB. The 2011 APB therefore represented the considered views of experts and key stakeholders: whilst its conclusions were not shared by all, it represented a balanced view of what would create a deliverable, desirable and sustainable new village heart for Mortlake. That process expressly concluded that a primary school was to be preferred over a secondary school. It also took into account the need for some new residential allocation to make the project viable – albeit on a substantially low density basis – and included a variety of uses of the type included in the Other Uses set out in the Draft Local Plan.

This was the Council's and local stakeholders' collective vision as to what would deliver the primary objective just five years ago. Inherent in that exercise, and the selection and allocation of the Other Uses, was and is a recognition (i) that the site is of a finite size – allowing more space for one use will inevitably restrict available space for another use – and (ii) that those selections and allocations will have consequences in other areas, beyond site allocations, which must properly be taken into account. The 2011 APB therefore included a range of uses representing a considered compromise.

For further discussion of these choices and their consequences, please refer to representations 2 A to D.

The Draft Local Plan, in stark contrast to the 2011 APB, now seeks to adopt the Secondary Educational Purposes alongside (and to the inevitable detriment of) the Other Uses. It appears, however, to retain the same overriding objective.

### **Community engagement**

Para. 150 of the NPPF provides that, '*Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities.*'

It continues, at para. 155 of the NPPF '*Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.*'

The NPPF finally goes on to state, at para. 157, '*Crucially, Local Plans should ... be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations.*'

The Council has failed to engage with, and take in to due (if any) account, the clearly expressed views of the local community. Not only do the Council's consultation materials offer no evidence as to community support for the proposal to require the Site to house a large secondary school and to remove or re-provision the playing fields, they disregard:

(i) the conclusions of the statutory consultation process which resulted in the adoption of the 2011 APB, which was that a primary school should be preferred to a secondary school and that the playing fields should be retained and protected – they also reflected broad support for the Other Uses which would be jeopardised by the requirement for a large secondary school; and

(ii) frequently and strongly expressed views by residents of properties adjacent to the Site and local representative groups, such as the Mortlake Brewery Community Group.

### **Material impediment to achieving sustainable development**

Para. 151 of the NPPF provides that, '*Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.*'

Para. 152. goes on to state, '*Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered.*'

The Other Uses comprised in the 2011 APB represent the culmination of detailed analyses of what could realistically be sustained on the Site for the benefit of local stakeholders. Documentation relating to the adoption of the plan provides many example of this. To select a few, it provided for:

- the construction of new housing (including affordable housing);
- new businesses of a type in-keeping with the local area and thus the creation of new jobs – especially relevant in view of the job losses stemming from the closure of the brewery;
- the provision of retail, leisure (including a new boat museum) and other commercial development;
- the provision of infrastructure for transport (including a potential relocation of Mortlake bus interchange) and the enhancement of the River Thames borders;
- a requirement for appropriate provision of local infrastructure and facilities (including a new primary school); and
- the protection of and enhancement of existing green spaces and landscape, such as Mortlake Green and the playing fields.

These all correspond to the strategic priorities contemplated by para. 156 of the NPPF and combine economic, social and environmental gains, with a view to providing a new village heart for Mortlake.

A draft site allocations plan was formulated (set out at Appendix A to the 2011 APB) to demonstrate how these competing demands could all be accommodated.

The Council, through the Draft Local Plan, now seeks to tear up that NPPF-compliant plan entirely by seeking to include, and even prioritise, the Secondary Educational Uses on the Site.

To be clear: this is not a 'minor tweak' which could be accommodated within the 2011 APB which was consulted upon: an area of the site allocated to accommodate 400 primary school children and staff will be replaced – somewhere on the Site - by buildings required to house 1,400 secondary school children and staff. This could effectively render redundant the entire scheme promulgated by the 2011 APB, which the Local Plan otherwise purports to safeguard. And other aspects will inevitably suffer. The Council has offered no evidence to the contrary. Indeed, the Council has offered no evidence of having properly considered the consequences of promoting the Secondary Educational Uses on sustainable development of the area at all.

The clear consequence of this is that the Other Uses will inevitably, and disproportionately, be prejudiced.

And, significantly, the plan will no longer be compliance with the requirements of paragraphs 151, 152 and 156 of the NPPF.

#### **Draft Local Plan is insufficiently clear**

Para. 154 requires that '*Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.*'

Allied to the considerations set out under 'Material impediment to achieving sustainable development' set out above, the Council seeks in the Draft Local Plan:

- (i) on the one hand, to require that the Secondary Education Uses be incorporated; yet
- (ii) on the other hand, to provide an over-arching aim of creating a new village heart for Mortlake through promoting a multi-use site incorporating the Other Uses and safeguarding the 2011 APB conclusions.

For the reasons set out in other representations, it is firstly highly doubtful that this can be successfully achieved at all, and second offers no guidance to a decision maker as to how this could or should be achieved in a development proposal.

It is entirely unrealistic. It becomes all the more unrealistic when the consequences of a requirement for a secondary school are considered further: these are subject to further studies and analyses which will, one suspects, demonstrate firstly that a secondary school is not in fact or law 'clearly' required on the Site (as the Draft Local Plan suggests) and second that including it will, when considered in tandem with the new housing required to make the development viable, result in legal /safe recommended levels of air pollution being exceeded and/or Local Green Space designations and/or tree preservation orders being breached.

The requirement for a secondary school on the Site must be struck out.

#### **Preference for secondary school over primary school**

There is nothing in the NPPF which requires the Council to prioritise secondary education over sustainable development, or primary education.

To the contrary – express mention is made (at para. 38) to ensuring that in large-scale developments, such as the present one '*Where practical, ..., key facilities such as primary schools and local shops should be located within walking distance of most properties.*' The Council is expressly seeking to remove the primary school, required by the 2011 APB, from the Site.

#### **Inappropriate use of additional development plan documents**

Para. 153 states '*Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any*

*additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.*'

The School Planning Place Strategy, referenced in the Mortlake Village Plan and the Draft Local Plan, *de facto* constitutes an additional development plan document. That is the document through which the Cabinet of the Council, purported to take the decision in 2015, without consultation, to replace the viable scheme including a primary school, with the scheme containing a secondary school (and possibly very little else).

The need to usurp the existing scheme set out in the 2011 APB (itself a supplementary planning document) with a secondary education requirement is far from clearly made out for the reasons discussed at length in representations 2E to G.

Without undermining any one of those points, it is worth noting that:

(i) that decision focussed solely on supply and demand needs for the eastern part of the Borough, not the suitability, viability or sustainability of the Site as the right place to satisfy the perceived shortfall – it also expressly acknowledged the need to undertake further studies as pre-conditions to the Site being accepted as the correct site for a secondary school, none of which I am aware have to date taken place;

(ii) contrary to para. 158, no proportionate evidence base of the impact of that decision was made, not least on the Other Uses; and

(iii) that decision, alongside some twelve other matters under consideration, appears from the minutes to have been taken in just seventeen minutes, suggesting procedural irregularities, or at least a failure to take due account of all relevant factors and/or giving undue weight to an irrelevant or immaterial factor.

The above-referenced documents must therefore be disregarded in formulating planning policy, save to the (very limited) extent they offer evidence of a matter that is itself worthy of consideration in due course (but not for the purpose of the Local Plan).

#### **Impact on environment: impact on air quality**

Para. 154 of the NPPF requires Local Plans to be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.

It continues to state, at para. 156, that 'Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to develop.. climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.'

Para. 157 states, 'Crucially, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and sup

Para. 109 states that, *'The planning system should contribute to and enhance the natural and local environment by ... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability'*.

Further, at para. 110, it states: *'In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.'*

The Site borders, for the full extent of its southern end, the Lower Richmond Road. Recent studies showed that this particular area, especially at Chalker's Corner (approx. 0.3km away from the south-western point of the Site), suffers from being one of the worst areas in London for air pollution.

Furthermore, it was identified as being a Council 'Air Quality Focus Area', such was the poor level of air pollution and the potential for improvement.

The proposed requirement for the Secondary Educational Purposes is strongly at odds with the Council's duties under the NPPF for two reasons. First, by removing the playing fields, and the trees on that part of the Site, there will be a removal of the vegetation that mitigates the harmful effects of vehicular transport. Furthermore, and more significantly, the Council plans are widely expected to propose the establishment of a secondary school which will inevitably bring a further 1,400 people daily along this stretch of road. There is no way to accommodate this number of daily visitors to the Site without materially and prejudicially impacting air quality levels at a site which is already incontrovertibly one of the worst in London.

### **Impact on playing fields**

For specific discussion around the impact of the inclusion of a secondary school on the site of the playing fields, please refer to separate representation 1A.

## **Rep 1C - Sustainability Appraisal Report shortcomings**

### **Issue:**

The table at pages 107 to 109 of the Sustainability Appraisal Report in relation to SA 24 (i) omits to consider certain points of material importance; (ii) relies in certain regards on irrelevant issues and (iii) attributes an incorrect weighting to the positive and negative factors under consideration. This also provides strong evidence that the Council has failed to comply with European Directive 2001/42/EC.

### **Detail:**

Row 3 - travel - the brewery has already ceased operations so there is no positive here, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport

Row 4 - climate change mitigation - the increased traffic referred to above will materially and negatively impact emissions

Row 6 - biodiversity - if any part of the playing field and/or trees are removed, this will be a negative

Row 7 - landscape and townscape - if a large secondary school is required, this will be a negative

Row 8 - parks and open spaces - if any part of the playing fields are to be removed, this will be a material negative

The summary of assessment at the foot of the table should be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses.

## **Non-compliance with EU law – environmental assessment**

Planning authorities, such as the Council, must also undertake an SEA in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 which implement the European Directive 2001/42/EC on 'the assessment of effects of certain plans and programmes on the environment' (the 'strategic environmental assessment' directive or SEA Directive) in England.

The Directive describes the objective of SEA as to "provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development".

For the reasons set out in these representations, in particular that the proposals in SA 24 as regards (i) a new large secondary school and (ii) removal of the playing fields, as well as any proposal to increase the residential housing allocation, will inevitably take the Lower Richmond Road and environs above legal and/or recommended safe levels of noxious gas emissions. The Council has failed to demonstrate – or even properly acknowledge – the impact of this or how (if even possible) it would be mitigated.

**Rep 2A - Requirement for secondary educational use renders overriding objective and other uses very difficult, if not impossible, to achieve.**

Draft Local Plan provisions:

“Secondary Educational Uses”

The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) states that ‘The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required’. It also states that ‘Appropriate uses, in addition to educational, include...’.

Bullet point 4 below that box goes on to state that ‘There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council’s School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.’

“Other Uses”

The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) provides for ‘a new village heart and centre for Mortlake’. It goes on to provide for a variety of intended uses, including residential, employment, health, community and social infrastructure facilities, sport and leisure uses. It also indicates that ‘high quality open spaces and public realm’ should be incorporated.

Bullet point 1 below the that box states ‘The Council has produced and adopted a development brief in 2011 for the site, which sets out the vision for redevelopment and provides guidance on the site’s characteristics, constraints, land use and development opportunities.’

Issue: To give effect to the Secondary Educational Uses on the site will render the Other Uses impossible to implement. This includes the stated overriding objective for the site, which has since 2010 been to create a new village heart for Mortlake. It cannot be the intention of applicable planning legislation and policies for one single use – opposed by local stakeholders – to have ‘backdoor’ primacy in this way: the entire exercise would be futile and all references to the Other Uses would be redundant. The Council has yet to produce any plan or study showing the feasibility of the Other Uses if the Secondary Educational Uses are pursued. The Draft Local Plan text should be amended as set out in the following section of these representations.

Detail: The 2011 APB contemplated the provision, in the location set out in Appendix A thereto, of a two-form entry primary school. The Draft Local Plan, directly and indirectly through reference to the Council’s School Place Planning Strategy and the Mortlake Village Planning Guidance SPD, seeks to replace that primary school (without consultation) with a secondary school.

A detailed consultation process, on the back of a myriad of studies, preceded the adoption of the 2011 APB. The 2011 APB therefore represented the considered views of experts and key stakeholders: whilst its conclusions were not shared by all, it represented a balanced view of what would create a deliverable, desirable and sustainable new village heart for Mortlake. That process expressly concluded that a primary school was to be preferred over a secondary school. It also took into account the need for some new residential allocation to



make the project viable – albeit on a substantially low density basis – and included a variety of uses of the type included in the Other Uses set out in the Draft Local Plan.

This was the Council's and local stakeholders' collective vision as to what would deliver the primary objective just five years ago. Inherent in that exercise, and the selection and allocation of the Other Uses, was and is a recognition (i) that the site is of a finite size – allowing more space for one use will inevitably restrict available space for another use – and (ii) that those selections and allocations will have consequences in other areas, beyond site allocations, which must properly be taken into account. The 2011 APB therefore included a range of uses representing a considered compromise.

The Draft Local Plan, in stark contrast to the 2011 APB, now seeks to adopt the Secondary Educational Purposes alongside the Other Uses. It appears, however, to retain the same overriding objective.

In order to deliver that overriding objective, it appears inconceivable that the Secondary Educational Purposes could be included, and even be given priority over the Other Uses (as appears to be the case by stating this the Secondary Educational Purpose 'will be required' and that the Other Uses are, 'in addition to educational').

In assessing this, one must look at the characteristics of a six-form entry, plus sixth form, secondary school, and then consider the impact that will have. (Something the Council appears to have failed to do).

First, in terms of numbers. I would estimate circa 1,300 pupils, being seven years multiplied by 30 pupils multiplied by six forms. Teaching staff, specialist staff – such as music and sports, canteen staff, management, contractors and maintenance staff - would typically be expected to amount to between 60 and 200. That means one must be looking at around 1,350 to 1,500 people attending the site on a daily basis – possibly more, for instance visiting school children attending for sports events.

By way of context, the village of Mortlake presently has approximately 2,000 residents I am told. So this would be a huge impact on existing daily people flows.

One must also consider the size of the site allocation for such a school. This is not set in stone. I attended a school of marginally fewer pupils (c.1,080), with a site size bigger than the entire Site. If the Council were to construct a school based on educational norm design standards for the most compact school contemplated – and do taxpayers and the electorate really want to settle for the bare minimum in the Borough, or should we be aiming higher? – that would require a site size of about 1.5 to 2 hectares. But that disregards parking space and spaces for buses and other transport to park and turn around. So the true site requirement will be significantly bigger – a minimum of 2.5 to 3 hectares would seem reasonable.

The overall Site amounts to 8.6 hectares, of which significantly less is built upon and should thus provide the maximum footprint for any new development. In contrast, a primary school built on the same basis and of the type contemplated by the 2011 APB would require 0.5 to 0.75 hectares.

So the space available for allocation to elements critical to a sustainable development (housing (including affordable), commercial, social, green spaces) would need to shrink by a minimum of 2 hectares. Or by a third. And probably more in practice.

**The relevance of this is very simple: including a six-form entry, plus sixth form, secondary school on the site will have a significant, and potentially fatal, impact on the deliverability of the overriding objective for the site and the Other Uses which local stakeholders value have repeatedly, over many years, asked the Council to commit to include in the Local Plan.**

Will the housing requirements be decreased commensurately? From 390 dwellings approved at the time of the 2011 consultation (or 200 to 300 as per the Council's latest Authority Monitoring Report on Housing 2014/15, page 18), to say 100 now, of which 40 to 50 affordable? That would hardly be consistent with national and London planning guidance.

Finally, and taking a step back, the stated overriding objective is to deliver a new village heart for Mortlake. It forms part of the Village Plan. No village would surely ever be planned to incorporate a school of the size of school of this nature and size. The Local Plan for Mortlake simply cannot conceivably be delivered in its present form if the Council retains the six-form entry, and sixth form, secondary school.

If you were to ask the man on the Clapham omnibus what they would want to see in a village, be that in terms of what a village requires to be desirable, to function sustainably, or to be attractive – they surely would not opt for a secondary school, let alone one of this size. The Draft Local Plan speaks of vibrancy: what is vibrant about an enclosed, private concrete jungle, that will be closed evenings and weekends, serving pupils who commute in from outside of the local area?

This must not be allowed to proceed.

If it were the Council's intention no longer to pursue the objective of a new village heart for Mortlake incorporating the Other Uses, the Council would be duty bound to have consulted from the start on that basis to enable due representations to be made - and the proposal to be overturned on any one of a number of bases. The Draft Local Plan therefore additionally suffers from procedural inadequacies in this regard.

## **Rep 2B - Primacy of secondary educational use over other uses: disproportionate impact**

### **Draft Local Plan provisions:**

#### **“Secondary Educational Uses”**

The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) states that ‘The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required’. It also states that ‘Appropriate uses, in addition to educational, include...’.

Bullet point 4 below that box goes on to state that ‘There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council’s School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.’

#### **“Other Uses”**

The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) provides for ‘a new village heart and centre for Mortlake’. It goes on to provide for a variety of intended uses, including residential, employment, health, community and social infrastructure facilities, sport and leisure uses. It also indicates that ‘high quality open spaces and public realm’ should be incorporated.

Bullet point 1 below the that box states ‘The Council has produced and adopted a development brief in 2011 for the site, which sets out the vision for redevelopment and provides guidance on the site’s characteristics, constraints, land use and development opportunities.’

**Issue:** By seeking to promote the Secondary Educational Uses as it does, the Draft Local Plan disproportionately seeks to deliver one design feature / use over all others, to the disproportionate detriment of those other uses, to the extent it impacts delivery of the overriding objective for the site as stated in the 2011 APB and the present Draft Local Plan: to create a new village heart for Mortlake.

**Detail:** The 2011 APB contemplated the provision, in the location set out in Appendix A thereto, of a two-form entry primary school. The Draft Local Plan, directly and indirectly through reference to the Council’s School Place Planning Strategy and the Mortlake Village Planning Guidance SPD, seeks to replace that primary school (without consultation) with a secondary school.

A detailed consultation process, on the back of a myriad of studies, preceded the adoption of the 2011 APB. The 2011 APB therefore represented the considered views of experts and key stakeholders: whilst its conclusions were not shared by all, it represented a balanced view of what would create a deliverable, desirable and sustainable new village heart for Mortlake. That process expressly concluded that a primary school was to be preferred over a secondary school. It also took into account the need for some new residential allocation to make the project viable – albeit on a substantially low density basis – and included a variety of uses of the type included in the Other Uses set out in the Draft Local Plan.

This was the Council’s and local stakeholders’ collective vision as to what would deliver the primary objective just five years ago. Inherent in that exercise, and the selection and allocation of the Other Uses, was and is a recognition (i) that the site is of a finite size – allowing more space for one use will inevitably restrict available space for another use – and (ii) that those selections and allocations will have consequences in other areas, beyond site allocations, which must properly be taken into account. The 2011 APB therefore included a range of uses representing a considered compromise.

The Draft Local Plan, in stark contrast to the 2011 APB, now seeks to adopt the Secondary Educational Purposes alongside the Other Uses. It appears, however, to retain the same overriding objective.

In order to deliver that overriding objective, it appears inconceivable that the Secondary Educational Purposes could be included, and even be given priority over the Other Uses (as appears to be the case by stating this the Secondary Educational Purpose ‘will be required’ and that the Other Uses are, ‘in addition to educational’.

In assessing this, one must look at the characteristics of a six-form entry, plus sixth form, secondary school, and then consider the impact that will have. (Something the Council appears to have failed to do).

First, in terms of numbers. I would estimate circa 1,300 pupils, being seven years multiplied by 30 pupils multiplied by six forms. Teaching staff, specialist staff – such as music and sports, canteen staff, management, contractors and maintenance staff - would typically be expected to amount to between 60 and 200. That means one must be looking at around 1,350 to 1,500 people attending the site on a daily basis – possibly more, for instance visiting school children attending for sports events.

By way of context, the village of Mortlake presently has approximately 2,000 residents I am told. So this would be a huge impact on existing daily people flows.

One must also consider the size of the site allocation for such a school. This is not set in stone. I attended a school of marginally fewer pupils (c.1,080), with a site size bigger than the entire Site. If the Council were to construct a school based on educational norm design standards for the most compact school contemplated – and do taxpayers and the electorate really want to settle for the bare minimum in the Borough, or should we be aiming higher? – that would require a site size of about 1.5 to 2 hectares. But that disregards parking space and spaces for buses and other transport to park and turn around. So the true site requirement will be significantly bigger – a minimum range of 2.5 to 3.5 hectares could be envisaged.

The overall Site amounts to 8.6 hectares, of which significantly less is built upon and should thus provide the maximum footprint for any new development. In contrast, a primary school built on the same basis and of the type contemplated by the 2011 APB would require 0.5 to 0.75 hectares.

So the space available for allocation to elements critical to a sustainable development (housing (including affordable), commercial, social, green spaces) would need to shrink by a minimum of 2 hectares. Or by a third. And probably more in practice.

The relevance of this is very simple: including a six-form entry, plus sixth form, secondary school on the site will have a significant, and potentially fatal, impact on the deliverability of the overriding objective for the site and the Other Uses which local stakeholders value and have repeatedly, over many years, asked the Council to commit to include in the Local Plan. In other words, the inclusion of this particular use is entirely disproportionate in that it will not enable any other benefits from the opportunity to be delivered.

As mentioned above, the 2011 APB also considered the consequences of the site allocations. One reason for including a primary school rather than a secondary school on the site would doubtless have been because of its smaller space. But it was more than that: there was a recognition that having to accommodate an additional 1,000 people on, and coming to and from, the site (approximately 1,400 as opposed to 400 with a primary school) on a daily basis was simply not feasible. The site is of finite size. Local spaces and facilities are of a limited size and capacity.

Finally, and taking a step back, the stated overriding objective is to deliver a new village heart for Mortlake. It forms part of the Village Plan. No village would surely ever be planned to incorporate a school of the size of school of this nature and size. The Local Plan for Mortlake simply cannot conceivably be delivered in its present form if the Council retains the six-form entry, and sixth form, secondary school, such is its size and impact on the site. If you were to ask the man on the Clapham omnibus what they would want to see in a village, be that in terms of what a village requires to be desirable, to function sustainably, or to be attractive – they surely would not opt for a secondary school, let alone one of this size. The Draft Local Plan speaks of vibrancy: what is vibrant about an enclosed, private concrete jungle, that will be closed evenings and weekends, serving pupils from outside of the local area?

**Thus, to allow the Draft Local Plan to be approved in its present form, would disproportionately prejudice the delivery of any other uses, disproportionately prejudice the local stakeholders seeking to benefit from those other uses; and would disproportionately impact the lives of local stakeholders. All because, in formulating the Draft Local Plan and School Place Planning Strategy, disproportionate weight has been placed on the need for the Secondary Educational Uses in the area and the appropriateness of the Site to meet that need.**

And in any event, if it were the Council's intention no longer to pursue the objective of a new village heart for Mortlake incorporating the Other Uses, the Council would be duty bound to have consulted from the start on that basis to enable due representations to be made - and the proposal to be overturned on any one of a number of bases. The Draft Local Plan therefore additionally suffers from procedural inadequacies in this regard.

## **Rep 2C - Primacy of secondary educational use over other uses: failure to consider consequences**

### Draft Local Plan provisions:

#### **"Secondary Educational Uses"**

The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) states that 'The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required'. It also states that 'Appropriate uses, in addition to educational, include...'.

Bullet point 4 below that box goes on to state that 'There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.'

#### **"Other Uses"**

The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) provides for 'a new village heart and centre for Mortlake'. It goes on to provide for a variety of intended uses, including residential, employment, health, community and social infrastructure facilities, sport and leisure uses. It also indicates that 'high quality open spaces and public realm' should be incorporated.

Bullet point 1 below the that box states 'The Council has produced and adopted a development brief in 2011 for the site, which sets out the vision for redevelopment and provides guidance on the site's characteristics, constraints, land use and development opportunities.'

Issue: By seeking to promote the Secondary Educational Uses as it does, the Draft Local Plan will have a material impact on the deliverability of the Local Plan, on the sustainability of the development and the wider area, and on the local community. These consequences have not been duly considered by the Council. Or, if they have been considered, an undue importance has been attributed to the need for a secondary school over the consequences of that allocation, leading to an unreasonable, or irrational, decision to continue to promote it.

Detail: The 2011 APB contemplated the provision, in the location set out in Appendix A thereto, of a two-form entry primary school. The Draft Local Plan, directly and indirectly through reference to the Council's School Place Planning Strategy and the Mortlake Village Planning Guidance SPD, seeks to replace that primary school (without consultation) with a secondary school.

A detailed consultation process, on the back of a myriad of studies, preceded the adoption of the 2011 APB. The 2011 APB therefore represented the considered views of experts and key stakeholders: whilst its conclusions were not shared by all, it represented a balanced view of what would create a deliverable, desirable and sustainable new village heart for Mortlake. That process expressly concluded that a primary school was to be preferred over a secondary school. It also took into account the need for some new residential allocation to make the project viable – albeit on a substantially low density basis – and included a variety of uses of the type included in the Other Uses set out in the Draft Local Plan.

This was the Council's and local stakeholders' collective vision as to what would deliver the primary objective just five years ago. Inherent in that exercise, and the selection and allocation of the Other Uses, was and is a recognition (i) that the site is of a finite size – allowing more space for one use will inevitably restrict available space for another use – and (ii) that those selections and allocations will have consequences in other areas, beyond site allocations, which must properly be taken into account. The 2011 APB therefore included a range of uses representing a considered compromise.

The Draft Local Plan, in stark contrast to the 2011 APB, now seeks to adopt the Secondary Educational Purposes alongside the Other Uses. It appears, however, to retain the same overriding objective.

In order to deliver that overriding objective, it appears inconceivable that the Secondary Educational Purposes could be included, and even be given priority over the Other Uses (as appears to be the case by stating this the Secondary Educational Purpose 'will be required' and that the Other Uses are, 'in addition to educational').

In assessing this, one must look at the characteristics of a six-form entry, plus sixth form, secondary school, and then consider the impact that will have. (Something the Council appears to have failed to do).

First, in terms of numbers. I would estimate circa 1,300 pupils, being seven years multiplied by 30 pupils multiplied by six forms. Teaching staff, specialist staff – such as music and sports, canteen staff, management, contractors and maintenance staff - would typically be expected to amount to between 60 and 200. That means one must be looking at around 1,350 to 1,500 people attending the site on a daily basis – possibly more, for instance visiting school children attending for sports events.

By way of context, the village of Mortlake presently has approximately 2,000 residents I am told. So this would be a huge impact on existing daily people flows.

One must also consider the size of the site allocation for such a school. This is not set in stone. I attended a school of marginally fewer pupils (c.1,080), with a site size bigger than the entire Site. If the Council were to construct a school based on educational norm design standards for the most compact school contemplated – and do taxpayers and the electorate really want to settle for the bare minimum in the Borough, or should we be aiming higher? – that would require a site size of about 1.5 to 2 hectares. But that disregards parking space and spaces for buses and other transport to park and turn around. So the true site requirement will be significantly bigger – a minimum range of 2.5 to 3.5 hectares could be envisaged.

The overall Site amounts to 8.6 hectares, of which significantly less is built upon and should thus provide the maximum footprint for any new development. In contrast, a primary school built on the same basis and of the type contemplated by the 2011 APB would require 0.5 to 0.75 hectares.

So the space available for allocation to elements critical to a sustainable development (housing (including affordable), commercial, social, green spaces) would need to shrink by a minimum of 2 hectares. Or by a third. And probably more in practice.

## Impact on Other Uses

The relevance of this is simple: including a six-form entry, plus sixth form, secondary school on the site will have a significant, and potentially fatal, impact on the deliverability of the overriding objective for the site and the Other Uses which local stakeholders value and have repeatedly, over many years, asked the Council to commit to include in the Local Plan.

## Traffic: impact on environment

As mentioned above, a secondary school will bring approximately 1,000 more people per day to the immediate vicinity of the Site, compared to the primary school proposal. Or 1,400 more people per day generally. And that takes no account of the increased number of residents moving around as a consequence of new dwellings.

The Site is situated immediately adjacent to the Lower Richmond Road. For reference, refer to page 5 of the following site marketing document (copyright acknowledged) – that is the road running immediately to the south of the site:

<https://www.geraldeve.com/wp-content/uploads/2015/08/Stag-Brewery-Mortlake-Brochure.pdf>

Recent studies showed that this particular area, especially at Chalker's Corner (approx. 0.3km away), suffers from being one of the worst areas in London for air pollution. There is ample local data to support this. I understand it exceeds legal or recommended safe limits in relation to the presence of noxious gases.

Furthermore, it was identified as being a Council 'Air Quality Focus Area', such was the acknowledged poor level of air pollution and the potential for improvement.

The issue is particularly acute because of the geographical layout of the Site: it is bordered to the north by the river, to the west by Chalker's Corner junction and to the south, approximately 100 meters south of the Lower Richmond Road, by the railway line (which has no tunnel or vehicular bridge). To the east the Lower Richmond Road continues (as Mortlake High Street), as a single-lane highway running through the main Mortlake commercial area.

To cite the Council's Second Implementation Plan: "*The River Thames to the North and the Royal Parks to the South act as barriers to through routes in the Borough, and as a result, high volumes of traffic are being channelled onto a small number of local roads. In particular, the transport network is a particular barrier in the north of the Borough adversely affecting the areas of Sheen, Mortlake and Barnes. Also the River and rail lines cause further difficulties. The severance to local communities caused by the A205 South Circular, the River Thames and railway lines is already a significant issue.*"

This means that traffic flows are concentrated in a small area and are consequently very slow at all but the most off-peak times. A school would create traffic flows at already-congested peak times.

Whilst clever initiatives may help – such as a tunnel under (or bridges over) the railway line and changing road lay-outs – these will represent improvements to an already inadequate situation but will barely touch on rendering the area suitable for a further thousand daily visitors at the same time.

And to think about the impact on other road-users or including additional crossings on the road to allow people to access the station *en masse* at rush hour...It would be chaos

Expert reports should be commissioned to ascertain whether legal or recommended safe limits will be breached: if so, this project simply cannot proceed as currently contemplated.

Does the Council seriously intend to site a secondary school for the Borough's children, and its staff, to both of whom they owe a duty of care, in the midst of a known pollution hotspot, which will become materially worse, when other options exist?

There are already two nursery schools immediately bordering the Site on the Lower Richmond Road: the Council must not knowingly, or recklessly, allow the health of children aged from newborn to 5 years to be harmed in this way.

To do so would be an incontrovertible breach of para. 109 of the NPPF. They would also be doing so with blood on their hands and a stream of litigation to follow for years to come, for which the Council, and individual Councillors, will be held responsible. .

#### **Traffic: impact on journeys**

As explained above, traffic levels are already barely tolerable along the Lower Richmond Road, but more widely along Mortlake High Street, Sheen High Street, at Chalker's Corner, on the A316 and the South Circular. At peak times, it grinds to a standstill.

At a purely local level, it is extremely difficult to exit Williams Lane on to the Lower Richmond Road at peak times. It will become more or less impossible, and unsafe, with additional traffic movements.

It is already a Council priority to improve transport in Mortlake (again as per the Council's Second Implementation Plan) : *"Reducing the need to travel but to make all areas of the Borough and particularly areas of relative disadvantage (Castlenau, Ham, Hampton Nursery Lands, Heathfield, Mortlake and Whitton) accessible by safe, convenient and sustainable transport for all people, including those with disabilities."*

Whilst clever initiatives may help – such as a tunnel under (or bridges over) the railway line and changing road lay-outs – these will represent improvements to an already inadequate situation but will barely touch on rendering the area suitable for a further thousand daily visitors at the same time.

Plus, even if some visitors travel by rail, (i) there is already zero capacity on peak time railway journeys through Mortlake Railway Station, disregarding the impact of any new residential housing and (ii) people will still need to cross roads to get to the school.

There will be no space for a bus lane, so the well-used 419 will become subject to material delays or need to be re-routed – but there is no obvious place to re-route it.

Further, it is likely that improving flows in one place or direction will negatively impact flows in another place or direction. Can the Council really justify negatively impacting congestion on key London roads such as the South Circular and A316, increasing vehicular emissions elsewhere?

Has TfL approved this plan, or even contemplated a way in which it might be feasible and committed to the requisite additional expenditure?

Extra congestion will also jeopardize access for emergency vehicles.

I am all for solutions. But there is no way that any reasonable Council, apprised of all these consequences, and making appropriate investigations, could take the decision to put a six-form entry, plus sixth form, secondary school on the Site. It just will not work. By solving one problem – a perceived need for secondary education facilities – it will be creating many, many more problems, some with profound and lasting consequences on Mortlake and its inhabitants.

**Representation 2D - Changes in the Draft Local Plan affecting the 2011 APB must be consulted upon, in the same way the 2011 APB itself was consulted upon prior to adoption.**

Draft Local Plan provisions:

“Secondary Educational Uses”

The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) states that ‘The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required’. It also states that ‘Appropriate uses, in addition to educational, include...’.

Bullet point 4 below that box goes on to state that ‘There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council’s School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.’

2011 APB

Bullet point 1 below that box states ‘The Council has produced and adopted a development brief in 2011 for the site, which sets out the vision for redevelopment and provides guidance on the site’s characteristics, constraints, land use and development opportunities.’

Issue: The 2011 APB was formulated on the back of a detailed and thorough consultation process. That process determined that a primary school was an appropriate use of the site in all the circumstances, should the site ever become available. It went on to recommend an appropriate site allocation and position. Participants of the 2011 APB process expressly discounted the appropriateness of a secondary school on the site. A change to the 2011 APB, of such material significance – both specifically to overturn a point on which a conclusion has been reached in the 2011 APB and on the overall site plan - must be consulted upon in the same way as the original 2011 APB before it can take effect: failure to do so would undermine the consultation process to such an extent as to render it futile and undermine principles of natural justice, as well as the legitimate expectation of the community to expect a full and proper detailed consultation.

Detail: The 2011 APB contemplated the provision, in the location and of the size set out in Appendix A thereto, of a two-form entry primary school.

A detailed consultation process, on the back of myriad studies, preceded the adoption of the 2011 APB. The 2011 APB therefore represented the considered views of experts and key stakeholders: whilst its conclusions were not shared by all, it represented a balanced view of what would create a deliverable, desirable and sustainable new village heart for Mortlake. That process expressly concluded that a primary school was to be preferred over a secondary school. It also took into account the need for some new residential allocation to make the project viable – albeit on a substantially low density basis – and included a variety of other uses set out in the Draft Local Plan.

This was the Council’s and local stakeholders’ collective vision as to what would deliver the primary objective just five years ago. Inherent in that exercise, and the selection and allocation of the non-educational uses, was and is a recognition (i) that the site is of a finite size – allowing more space for one use will inevitably restrict available space for another use

– and (ii) that those selections and allocations will have consequences in other areas, beyond site allocations, which must properly be taken into account. The 2011 APB therefore included a range of uses representing a considered compromise.

The Draft Local Plan, in stark contrast to the 2011 APB, now seeks to adopt the Secondary Educational Purposes alongside the other uses it recommends. Moreover, it does so in a manner which purports to give precedence to the Secondary Educational Purposes.

This is not simply a case of swapping one word: primary for secondary. The changes expressly overturn the conclusions of the 2011 APB on a specific point of material importance to participating stakeholders – sufficiently material that the summary of views collated during the process make express reference to the inclusion of a primary school in place of a secondary school.

Further, when one considers the consequences of including the Secondary Educational Uses on the site, one must quickly conclude that the entire Draft Local Plan is unachievable and unsustainable by reason of its inclusion. Please refer to my representations 2A to 2C for further explanation in this regard. And yet the Council purports to make this decision without any consultation of the type conducted in producing the 2011 APB, which the Draft Local Plan otherwise seeks to uphold.

This, it must be said, runs contrary to the Council’s own stated approach in January 2016, where I was personally advised by a planning officer that: *“The report to Cabinet stated that the planning brief, adopted in July 2011, was subject to full statutory consultation with local residents and all requisite stakeholders in 2009 and 2010. Cabinet agreed at its meeting in October 2015 an updated School Place Planning Strategy and it highlighted the implications for educational needs in the borough, in particular for the Stag Brewery site. However, the Cabinet decision has not amended the agreed planning brief, and if the Council were to update/revise the brief, a public consultation would need to be carried out.”*

This seems eminently sensible. But is not, on my reading of the legislation and supporting materials, the correct interpretation. In principle, the Local Plan can override a supplemental planning brief. The reason this can be allowed to pass, is because the legislation contemplates that the Local Plan will be developed in accordance with the acts and the National Planning Policy Framework, which necessitate the impact of the Local Plan to be worked through in great detail, on the basis of sustainable plans, and with the benefit of proportionate evidence. None of these are available at present: this is simply a ‘pie-in-the-sky’ addition to address a perceived shortfall in secondary education places.

So the conclusion must be one of two things: Either:

(i) the Council is right – and there must be a detailed consultation at local level, with proper evidence, to amend the 2011 APB, and until this takes place the Local Plan must be expressed to be subject to the outcome of that exercise; or

(ii) as I think is the better reading of the various legislation, to include provision of a secondary school on the Site in the Local Plan requires consultation and formulation in accordance with the acts and the National Planning Policy Framework, which necessitate the impact of the Local Plan to be worked through in great detail, on the basis of sustainable plans, and with the benefit of proportionate evidence. The supplementary planning brief, or

amendments to the existing 2011 APB, would then be done within the framework of the adopted Local Plan. But the Local Plan cannot legally be adopted in its present form as a result of the matters stated above.

Any purported exercise of powers by the Council to the contrary, would be *ultra vires*.

**Rep 2E – The statement that ‘There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council’s School Place Planning Strategy.’ is unsupported, and unsupportable, in fact and law.**

Draft local plan provisions

The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) states that ‘The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required’.

Bullet point 4 below that box goes on to state that ‘There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council’s School Place Planning Strategy.’ Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.’

The 2011 APD contemplated the provision, in the location set out in Appendix A to the brief, of a two-form entry primary school. The Draft Local Plan, directly and indirectly through reference to the Council’s School Place Planning Strategy and the Mortlake Village Planning Guidance SPD, seeks to replace that primary school with a secondary school.

Issue: The statement that ‘*There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council’s School Place Planning Strategy.*’ is unsupported. This is the case, in particular, because the Council’s School Place Planning Strategy makes and relies on errors of fact and law which are being inappropriately ‘rubber-stamped’ into a statutory planning document. In contrast, there remains a demonstrable need in this area for primary education provision.

Detail: The Draft Local Plan does not set out on the basis on which the words ‘need’ or ‘in this area’ are to be construed. There are a number of ways to assess these terms.

However, I think it is common ground with the Council that an ‘area’ in this context is the Borough and accordingly the ‘need’ is for the Council to discharge its duties under Section 14 of [the Education Act 1996](#), as amended, which provides to the effect that the Council has a duty to provide sufficient places for primary and secondary education for its residents. Subsection 2 states that, “*The schools available for an area shall not be regarded as sufficient for the purposes of subsection (1) unless they are sufficient in number, character and equipment to provide for all pupils the opportunity of appropriate education*”..

I shall return to the requirements of Section 14, and what they do and do not require properly to be taken into account. However, the first point to note is that the Local Plan should more explicitly state what the Council intends to say: i.e. ‘The Council considers there is a need ... in the Borough and, in accordance with the conclusions of the Council’s School Place Planning Strategy, the Council has determined that SA24 is the optimal location for it.’

There consequently becomes two issues:

(a) firstly, is there in fact and law a requirement for a six-form entry, plus sixth form, school in the Borough; and



(b) second, is the Council's determination that SA24 is the optimal location for it a reasonable one, which it is entitled to reach in the performance of its duties. Accordingly, there are both procedural and substantive issues at stake.

**Question 1: is there in fact and law a requirement for a six-form entry, plus sixth form, school in the Borough?**

The Council seeks to rely on its own School Place Planning Strategy, and in particular the studies which underpin it, to demonstrate this.

**GENERAL:**

**The Borough, or the 'eastern side of the Borough'?**

The School Place Planning Strategy is focussed on the 'eastern half of the Borough'. There is no legal basis for this, and the Education Act 1996 most certainly does not make any distinction. The requirement is to make appropriate provision in the Borough.

And, leaving aside the legal technicalities, the Council has explained that the distinction is required to enable pupils not to have to live 'up to six miles' from their school (see paragraph 26 of the School Place Planning Strategy). Six miles! This is entirely arbitrary and unwarranted. In almost all other authorities across the country, six miles would be considered an average journey; in rural parts, it would be considered a short journey. And this in a borough with frequent (if over-crowded) public transport. A pupil living in Mortlake could get to a school in Twickenham in 15 to 25 minutes, depending on exact starting and finishing points.

This approach significantly undermines the validity of the conclusion that there is a need, as the Cabinet, in adopting the School Place Planning Strategy on which they 'clear need' is predicated, has failed to accurately identify the scope of the Council's legal duty; furthermore, in so doing, it has taken into account irrelevant factors in reaching its decision.

There is a clear case for judicial review should the Council not reverse its decision.

**PROVISION OF SCHOOL PLACES:**

**Provision in the Borough – impact of new schools**

The School Planning Place Strategy calculated future provision in the Borough as at a date no more recent than its adoption at the Cabinet meeting of October 2015. In so doing, it made certain assumptions. Since the date of that document, certain developments have occurred which have increased available provision. This includes the following sites – further information on which is set out in representations being made separately on behalf of the Mortlake Brewery Community Group: St. Richard Reynold's Catholic College; Turing School; Richmond Upon Thames College.

**Provision in the Borough – opportunity to expand existing sites**

The School Place Planning Strategy recognised (at paragraph 27) that Christ's, Grey Court and Richmond Park Academy could be permanently expanded by a form entry each. The School Place Planning Strategy therefore explicitly stated that these options should each be explored.

The Cabinet, in reaching the decision to exploit the Site to meet an anticipated shortfall in supply, expressly determined that further studies on meeting demand from expanding existing sites must first be taken. This is also consistent with the resolution (at paragraph 6) to update the School Planning Place Strategy annually. Yet there is no evidence that either of these recommendations has occurred.

Accordingly, the principal evidence on which the Council seeks to rely to establish the 'clear need' is outdated and subject to extant conditions. The Local Plan, as a minimum, must acknowledge that these conditions must be explored before the Site can be allocated to secondary school use.

**Provision in the Borough – impact of alternative sources**

The Education Act 1996 does not specify how the obligation placed on the Council must be met. To the contrary, my understanding is that neighbouring authorities have concluded that it may be satisfied through provision of places in a neighbouring borough. And that is eminently sensible: a neighbouring borough may in fact be closer to a pupil than a distant school in the same Borough. It may also be cost efficient. And the school in the neighbouring borough may be of a higher standard than, or offer facilities of a type not offered by, a school in its own borough.

The School Planning Place Strategy paid lip-service to this possibility in stating (at paragraph 29) that '*In assessing further demand, though, it is vital that account be taken of new or planned secondary school provision in neighbouring local authority areas, most particularly Hounslow.*'

Despite this, it would appear that the Council's figures in the School Planning Place Strategy did not take such provision into account – or, as with the possibility of expanding existing sites, contemplated that exploring these options should be a condition to the Stag Brewery site being allocated to secondary education use. This is particularly relevant here, where I understand the Mortlake Brewery Community Group's own investigations have revealed an abundance of secondary provision just one mile away from the Site.

The Local Plan, as a minimum, must acknowledge that these conditions must be explored before the Site can be allocated to secondary school use.

**DEMAND FOR SCHOOL PLACES:**

**Pupil number requirements in the Borough**

The Council has used certain demographic data to calculate demand for school places in the Borough. Whilst that is not contested per se, I would make the following comments.

Firstly, if more recent data is available, it should be used in place of the old data.

Second, it should be adjusted to take account of pertinent assumptions where they may differ from the relevant assumptions underpinning the data otherwise being relied upon. This should be:

- to take account of the impact of 'Brexit', in particular in the Borough which is home to a disproportionately large number of foreign nationals, many of whom are engaged in

the financial services sector and will relocate to the Eurozone during the forecast period. The recent Richmond Park bi-election is testament to this.

- to take account of the higher than average proportion of parents who elect to educate their children in the private sector or out of the Borough, including at grammar schools;

Third, demand needs to correlate temporally with supply. That is to say, a projected need in fifteen years' time should not necessitate the provision now, to the extent that provision is not yet readily available but might realistically be expected to become available in due course.

#### **Demand in Eastern part of the Borough – Richmond Park Academy**

In any event, the conclusion in the School Place Planning Strategy that there is insufficient demand in the Eastern part of the Borough appears unsubstantiated, or at least places too great emphasis on transient factors. The School Place Planning Strategy references, as part of its anticipated requirements for the medium to long term, growth in demand for Richmond Park Academy. That is predicated on improving standards.

First, it is unclear that a recent, short term increase in performance should be used as the basis for long-term planning for the Borough – especially given the disproportionate effect that such an analysis would have on the development of the site. Secondly, it must be imprudent to assume a continued upward trajectory of performance at one school, without make a similar conclusion in relation to other schools? And thirdly, it cannot be appropriate to determine demand in one part of the Borough on the basis of one or more other schools being under-performing: the Council's focus should be on ensuring existing facilities are fit for purpose, which doubtless it will seek to do during the currency of the Local Plan.

#### **REPLACING PRIMARY SCHOOL SITE ALLOCATION WITH SECONDARY SCHOOL SITE ALLOCATION:**

**Has the need for a primary school disappeared or does the law require a need for a secondary school to take precedence over the need for a primary school?**

In short, no. The 2011 APB, which the Draft Local Plan otherwise endorses, states that the Council will recommend that a two-form entry primary school be incorporated within any development plans. The secondary school proposed by the Draft Local Plan replaces that primary school, which the Council determined was required only five years earlier.

As such, in order that the Draft Local Plan is not misleading to a material extent, it must make comment on either (i) the need for a primary school having disappeared or (ii) the need for a primary school being greater than the need for a secondary school.

On the first point, this clearly is not the case. The Council's own School Planning Place Strategy notes, at paragraph 5: '*... more places will be required to meet longer-term forecast demand, particularly in the primary phase.*' From a personal perspective, for my local primary school, Thomson House, which is situated in very close proximity to the site, there was in the last academic year a 330 meter catchment area – and that catchment area is shrinking year-on-year as siblings with priority pass through the school. It is the most over-

subscribed school in the Borough according to the Council's own figures! So clearly the requirement for a primary school currently remains.

And with a further 200-plus residences to be constructed on the site, that primary school need will only grow.

Furthermore, when one considers the typical demographic of the likely residents, they are significantly more likely to be either a young family with children of primary school age, or a couple planning a family, than a family of secondary school age. The developer's plans will no doubt support this - but by way of anecdotal evidence, of the 17 houses on the Trinity Mews Development adjacent to the site purchased from the developer in 2011/2012, eight fell into the primary school category; not a single one fell into the secondary school category.

Further, in contrast to secondary school education, where a comparatively high proportion of children of secondary school age are privately educated or attend out-of-Borough grammar schools, a much higher proportion of primary school children in the Borough attend primary schools in the Borough. The Council offers no data for this. However, primary school heads in the Borough will I am sure attest to this and, again speaking for families in the Trinity Mews development, this is certainly the case.

On the second point, in addition to the highly relevant argument made in the paragraph above which indicates the immediate local need for a primary school is higher than the immediate local need for a secondary school, there is no requirement in the Education Act, or as far as I'm aware otherwise, for a secondary education need to take precedence over a primary education need. Accordingly, there is no basis for the Council to reverse its own recommendation for a primary school with a secondary school, irrespective of relative need.

The Council has therefore either (i) given undue weight to one factor it considered over another factor it considered, or (ii) failed to take into account a relevant factor in its decision-making process, or (iii) has made an erroneous assessment.

**Question 2: is the Council's determination that SA24 is the only or optimal location for a six-form entry secondary school, plus sixth form, a reasonable one, which it is entitled to reach within the exercise of its functions.**

It is abundantly clear from the Cabinet meeting minutes – as brief as they are – that a conclusion was reached that, absent further provision, demand in the Borough (or at least, the Eastern part of the Borough) would exceed supply during the relevant period.

What is rather less clear is how that (i) in the view of the Cabinet, translates into a properly taken decision that the Site, already the subject of a detailed supplementary planning document, must feature a six-form entry, plus sixth form, secondary school. subject to further investigation to the detriment of all other competing needs for the Site and (ii) moreover, the basis on which the Council planning department appears to have rubber-stamped that conclusion without any further scrutiny or regard being had to relevant planning laws.

**Part I:** How does a determination (questionable, for the reasons stated in question 1 above) that there is a shortfall in secondary places over the planning period translate into a properly taken decision that the Site, already the subject of a detailed supplementary planning document, must feature a six-form entry, plus sixth form, secondary school?

## Consideration of the requirement

The Cabinet minutes (at para. 3.14) jump to the conclusion that '*a new secondary school, providing at least six forms of entry, will be needed in the eastern half of the borough by September 2019*'. The data underpinning this are not readily available. But, even if we disregard the short-comings in arriving at the number of places required, there remain two issues:

(i) it may be semantics, but this should presumably read 'one or more schools with an aggregate of at least six forms of entry, will be needed...'. The significant importance of this is that two, or even three new schools could fill the same gap – but critically, they would require less space and have a less significant impact on the environments in which they are situated and the ability to use that space to meet other, equally valuable, needs, such as housing, employment, social benefits and environmental protection. In other words, it shares the burden around. But it may also allow better, more apt sites to be found, more proximate to future pupils' homes, thereby minimising travel time, which seems to be the real driver here. And, critically, we have no idea whether or not this is the case – although one would imagine it to be – because the remit of the Education Funding Agency (per paragraph 3.15 of the Cabinet meeting minutes) was to find a site to accommodate a '*six-form entry secondary free school*' - noting that no mention was made of a sixth-form being required; and

(ii) the focus remains on an arbitrary division of the eastern part of the Borough. This is important and is discussed above. But moreover, it creates a parameter in the search for suitable sites that is unwarranted in law and is artificial in nature: it has to be better for a pupil living just in the eastern part of the borough to attend a school just in the western part of the Borough, or one where good transport links exist, than it is one in the far eastern side of the Borough, or one where transport renders it inaccessible.

## Consideration of supply options

For the reasons that follow, it is clear that alternative options to meet demand have either (i) been noted, and parked pending further analyses or (ii) not been properly assessed.

### Supply options: expansion and neighbouring Boroughs

As noted in Question 1 above, the Council expressly noted that other options may be available to meet the anticipated gap. This included (i) expansion of existing sites and (ii) consultation with neighbouring authorities. There is no evidence that these options have in fact been pursued.

### Supply options: Alternative sites

The School Planning Place Strategy offers no evidence of a consideration of alternative sites for the location of a secondary school when determining that the Site is the only location for a new school of this size. It simply states that, '*In attempting to secure sites for proposed and possible free schools, both primary and secondary, within the borough, the Education Funding Agency has undertaken extensive searches*.' This is frankly incredible, and represents a material error in the decision-making process: how does one hope to make an

informed decision of significant importance, without gathering all the evidence sensibly required to make that decision?

It is imperative that a current feasibility study be conducted prior to taking a decision of this magnitude in a local plan.

Initial studies by the Mortlake Brewery Community Group have identified a number of sites, details of which have been made available to the Council. One of those sites, *prima facie*, appears hugely promising, offering the following advantages over the Site:

- materially bigger and capable of expansion;
- vast open spaces adjacent to that site;
- purpose-built athletics facilities adjacent to that site;
- readily accessible by car, bus and train and;
- (I understand) already Council-owned.

These options should have been properly investigated by the Cabinet in determining whether or not to adopt the updated School Place Planning Strategy. They must now be investigated before inclusion in the Local Plan.

### Identification of the Stag Brewery site

Paragraph 3.16 of the Cabinet meeting minutes refers to a summary of the 'justification for [that] identification' at paragraphs 26 to 29 of the School Place Planning Strategy.

One might presume that the School Place Planning Strategy would shed some light on how the decision to recommend the Stag Brewery was taken. It might talk about:

- Deliverability;
- Compliance with other legal and planning obligations;
- Sustainability, including in accordance with the National Planning Policy Framework;
- Consequences of making the determination on the 2011 APB;
- Consequences of making the determination on the local community whom the decision affects – on residents, on sports groups using the playing fields, on Thomson House school, adopted planning brief; and/or
- Consequences of making the determination on the remainder of the School Place Planning Strategy: such a decision will necessarily impact the requirement for provision at another site.

All relevant factors in taking a decision of this magnitude. And factors one would expect the Council to be minded to demonstrate to the community – which had participated in large numbers in the 2011 APB process which the Council meeting sought to override – had been considered in great depth, and that that due process was being followed.

So what light does the School Place Planning Strategy cast on this. It says:

*'To meet medium-term increased demand, it is essential that a new six-form entry school is established on the Stag Brewery site.'*

And that is it. No discussion. One might think that, despite scant information being contained in the minutes, there was nonetheless a lively debate around these material

issues. But then one reads the minutes. The entire meeting lasted just seventeen minutes. To take a decision of huge importance to the lives of the local community. And seventeen minutes was the length of the entire meeting: in those seventeen minutes, decisions were also taken on some twelve other agenda items. The evidence of procedural impropriety is there for all to see.

#### Consideration of impact / consequences of making a site allocation

As noted above, there is no evidence of consideration of the matters referred to under 'Identification of the Stag Brewery site' above.

#### Consideration of deliverability of the provision of a secondary school

As noted above, there is no evidence of consideration of the matters referred to under 'Identification of the Stag Brewery site' above.

#### Was the decision properly taken as a matter of law?

In brief, no.

##### A. Illegality

The Cabinet of the Council, by purporting to make a planning decision outside the remit of the Local Plan (a process contemplated by the National Planning Policy Framework) and diametrically opposed to an adopted supplementary planning brief, has made a jurisdictional error. It had no jurisdiction to make such a determination.

##### B. Unreasonableness / irrationality

There is a case for the Council to answer as to whether, by determining to place a secondary school in the heart of an area which suffers from illegal or above recommended safe levels of emissions of noxious gases, and which will only become worse as a result of the decision and the development, the Cabinet made a decision so unreasonable that no reasonable authority could ever have come to it.

##### C. Irrelevant / relevant matters

Quite clearly, the Cabinet:

- failed to consider properly the presence of alternative sites, including to accommodate smaller schools which in aggregate could meet the same demand;
- failed to consider the deliverability of the proposal;
- failed to consider the sustainability of the proposal, including as required by the National Planning Policy Framework;
- failed to consider the proposal in light of the legal and statutory framework for planning decisions;
- failed to consider the consequences of the decision; and
- placed undue consideration on 'the eastern part of the Borough', rather than the Borough as contemplated by the Education Act, and arbitrarily considered a 6-mile travel distance to be significant.

The decision-maker in reaching its decision took into account irrelevant matters and/or failed to consider relevant matters

##### D. Procedural irregularity

By purporting to take a decision on a matter properly the subject of planning law, including a number of statutes and subordinate legislation and guidance, the Cabinet has acted ultra vires.

By purporting to take a decision on a matter properly the subject of a Local Plan, which requires a consultation exercise to adopt, the Cabinet has acted ultra vires and failed to follow due procedure.

By failing to consult on a material amendment to a matter which underpinned a supplementary planning document, in relation to which the Council is required by creature of statute to consult, the Council has failed to follow due procedure; this may also create legitimate expectation that the Council would consult, to the same degree, in relation to such a material amendment.

By acting arbitrarily, and without furnishing reasons for its decision, as evidenced by spending no more than seventeen minutes (and probably significantly less) in making a determination of significant local importance, the Cabinet has not followed due process and/or has failed to observe the principles of natural justice.

**Part B:** Leaving aside the deficiencies in the Cabinet's own decision-making process identified above, has the Council (acting through its planning department) acted appropriately?

#### Factual matrix

The Council planning department is internally responsible for formulating the Village Plan and Local Plan. The Local Plan in particular is a creature of statute provided for in the National Planning Policy Framework. That sets out certain procedural requirements to be complied with in the path towards adoption of a plan, as well as a number of requirements with which the Local Plan must comply.

The exercise of these functions, and the adoption of a Local Plan, should be effected in accordance with general legal principles relevant to decision-taking and exercise of powers by government bodies. Failure to comply is challengeable by judicial review; furthermore, the Local Plan process itself provides for review by the Inspector, to whom these representations are being made.

#### Approval of the School Place Planning Strategy and incorporation into the Local Plan

We have no visibility on the process by which the Council arrived at its decision to directly incorporate the conclusion of the Cabinet meeting into the plans enunciated in the initial scoping consultation held in January 2016.

I was unable to find any evidence that the key issues raised in Part A in relation to the replacement of a primary school with a secondary school, had been considered, challenged,

developed or updated. In addition to making a formal representation in the scoping round responses, I followed up directly with the Council planning department, who advised:

*'The School Place Planning Strategy provides an important evidence base for the Local Plan and the review of the Council's planning policies. The change in educational need and the priority for a secondary school on the Stag Brewery site, as opposed to a primary school, needs to be taken account of in the Council's Local Plan and in particular for the Stag Brewery site allocation.'*

That response confirmed my fears: the planning department, in formulating the Local Plan, was willing to rubber-stamp the (frankly, error-strewn) decision-making process undertaken by the Cabinet in adopting the School Place Planning Strategy. No evidence of scrutiny. No evidence of rectifying the deficiencies inherent in that decision, that is to say no consideration of:

- Deliverability;
- Compliance with other legal and planning obligations;
- Sustainability, including in accordance with the National Planning Policy Framework;
- Consequences of making the determination on the 2011 APB;
- Consequences of making the determination on the local community whom the decision affects – on residents, on sports groups using the playing fields such as Barnes Eagles, on Thomson House school, adopted planning brief,

other than to the extent set out in the Sustainability Appraisal Report, which is itself inadequate for the reasons set out in representation 1C.

Even if the Cabinet as a matter of education policy planning was entitled to reach a finding that flies in the face of natural justice and planning law, it is entirely inappropriate for a planning department to do so in the context of a statutory process entailing a full consultation. There is simply no analysis of proportionate evidence of the type required by the National Planning Policy Framework, despite persistent calls from local residents to consider this.

The Council has nonetheless persisted with this approach by including in the Draft Local Plan the statement, 'There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.'

A final point to note on this: the School Place Planning Strategy does not even make any reference to a requirement for a sixth form! So not only has the Draft Local Plan relied erroneously upon an erroneous conclusion of a procedurally inadequate Cabinet meeting, it has unilaterally determined to attribute to that document, in a document of statutory importance, a conclusion it did not reach.

#### Requirement for detailed consultation on the amendments

The Council planning department has advised that, "... the Cabinet decision has not amended the agreed planning brief, and if the Council were to update/revise the brief, a public consultation would need to be carried out.'

But this is not necessarily strictly true, if the changes were to be brought about through the medium of the Local Plan, as that would appear in and of itself to create the framework within which any changes to the 2011 APB and the Village Plan would need to be assessed. As such, inclusion in the Local Plan would effectively preclude the merits of a further detailed consultation round at that stage on these points of material significance.

It cannot have been parliament's intention that a detailed consultation process could be usurped or effectively repealed through a back-door general consultation process: the community has a legitimate expectation that a consultation process of equal focus on the key issues, and opportunity to make representations, would follow.

Having attended a meeting of the Mortlake Brewery Community Group on 6 February 2017, I can attest that the local community as a whole had no idea what was proposed by the Council, in stark contrast to the high degree of engagement which accompanied the 2011 APB process.

To re-cap, the 2011 APB followed a round of representations made on the back of four detailed land usage proposals on which the community was asked to comment. The consultation process comprised (i) an evening event in December 2009; (ii) an exhibition held between 4-6 November 2010; and (iii) a Public meeting on 9th December 2010, which was attended by approximately 130 people.

Has a comparable process been run here? No. Neither the Council nor the developer has offered any vision – oral or pictorial - for the Site, despite such a material change being proposed. The very first opportunity that the community will have to evaluate and comment on the proposal will take place (unless delayed further) in March 2017 - conveniently just after the deadline for responses to the Local Plan, which will (unless I am mistaken) in material part entrench the secondary school and re-provision of the playing fields, if accepted in its present form.

This simply cannot be right, it is an abuse of process to further an ill made-out requirement for a secondary school on the Site and it defeats the legitimate expectation of the community, and myself having been promised a further round of consultation.

It is not consultation if the purpose and scope of the consultation are so materially curtailed – that consultation would itself be subject to challenge.

#### Was the decision properly taken as a matter of law?

Again, in brief, no.

#### A. Unreasonableness / irrationality

By resolving for planning purposes to rubber stamp a decision of the Cabinet taken in October 2015 on a matter of education policy, without independent scrutiny, or updating, or search for independent or supporting evidence of any kind, nor consideration of whether that Cabinet decision was appropriately taken, the planning department has taken a decision or exercised its powers in a manner which is so unreasonable that no reasonable authority could ever have done so.

Further, there is a case for the Council to answer as to whether, by determining to place a secondary school in the heart of an area which suffers from illegal or above recommended safe levels of emissions of noxious gases, and which will only become worse as a result of the decision and the development, the Council made a decision so unreasonable that no reasonable authority could ever have come to it.

#### C. Irrelevant / relevant matters

Quite clearly, the Council:

- failed to consider properly the presence of alternative sites, including to accommodate smaller schools which in aggregate could meet the same demand;
- failed to consider the deliverability of the proposal;
- failed to consider the sustainability of the proposal, including as required by the National Planning Policy Framework;
- failed to consider the proposal in light of the legal and statutory framework for planning decisions;
- failed to consider the consequences of the decision; and
- placed undue consideration on 'the eastern part of the Borough', rather than the Borough as contemplated by the Education Act, and arbitrarily considered a 6-mile travel distance to be significant; and
- critically, placed undue consideration on the School Place Planning Policy, to the detriment of all other manner of evidence and consideration of pertinent issues and indeed the relevance of the School Place Planning Strategy to the statutory need to formulate a Local Plan.

The decision-maker in reaching its decision took into account irrelevant matters and/or failed to consider relevant matters

#### D. Procedural irregularity

By adopting a decision of another Council body without any consideration of its relevance to the statutory need to formulate a Local Plan, which requires a consultation exercise to adopt, the Council has failed to appropriately formulate a viable Local Plan at any stage.

By failing to consult on a material amendment to a matter which underpinned a supplementary planning document, in relation to which the Council is required by creature of statute to consult, the Council has failed to follow due procedure; this may also create legitimate expectation that the Council would consult, to the same degree, in relation to such a material amendment.

By failing to offer up any reasons for its decision, other than over-reliance on the School Place Planning Strategy, in making a determination of significant local importance, the Council has not followed due process and/or has failed to observe the principles of natural justice.

#### E. Legitimate expectation

By failing to give the community, and myself in particular, a full, detailed consultation process akin to the one run in adopting the 2011 APB, and expressly promised to me, the Council has reneged on a matter of legitimate expectation to the community, and myself.

### **Rep 3: Plans for housing insufficiently detailed**

#### **Draft Local Plan provisions:**

##### **"Residential Uses"**

The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) states that

'The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. ... Appropriate uses ... include residential (including affordable housing)...'

'The provision of residential uses (including affordable housing), will ensure that the new village heart becomes a vibrant centre for new communities.'

'Guidance on design and local character for the area is also set out in the Mortlake Village Planning Guidance SPD'

##### **"Other Uses"**

The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) provides for 'a new village heart and centre for Mortlake'. It goes on to provide for a variety of intended uses, including education, employment, health, community and social infrastructure facilities, sport and leisure uses. It also indicates that 'high quality open spaces and public realm' should be incorporated.

Bullet point 1 below the that box states 'The Council has produced and adopted a development brief in 2011 for the site, which sets out the vision for redevelopment and provides guidance on the site's characteristics, constraints, land use and development opportunities.'

Issue: Notwithstanding formal adoption at Local Plan level of the 2011 APB in this regard, the Council is invited to provide clarity to the developer on the nature and density of residential housing which it will consider appropriate, based on the consultation exercise and conclusions which gave rise to the 2011 APB, but taking into account the proposed revision to require provision of a large secondary school and sixth form. Allocation to Residential Uses must not undermine the commitment to delivery of the Other Uses.

Detail: The 2011 APB contemplated the provision, in the locations set out in Appendix A thereto, a variety of residential provision, with indicative acceptable densities.

A detailed consultation process, on the back of a myriad of studies, preceded the adoption of the 2011 APB. The 2011 APB therefore represented the considered views of experts and key stakeholders: whilst its conclusions were not shared by all, it represented a balanced view of what would create a deliverable, desirable and sustainable new village heart for Mortlake. That process expressly concluded that the scheme should generally be low density, rising to medium density towards the middle of the Site.

The plan appended to the 2011 APB '*indicates maximum heights that would generally be acceptable on the site and these reflect the planning benefits being sought. A mix of heights across the site will be required to reflect and relate to the existing urban grain and scale. Housing on the north western zone should be lower density with heights up to 3 storeys*

*relating to existing residential and of generally 3-4 stories around the playing fields and create a new street emulating the character of buildings of townscape merit on the Lower Richmond Road. [This could also refer to the Trinity Mews Development now in place.] ...If taller buildings are necessary to ensure a viable scheme higher building could be located at the core of the site, generally where the larger and higher existing buildings are located, and that height and scale diminish towards the perimeter of the site or along the Riverside.' This position must be maintained.*

Whilst it stopped short of stipulating a number of dwellings that would be appropriate, in the Council questionnaire which preceded it, the community came down heavily in favour of the mixed-use, lower density residential scheme of, from recollection, 390 dwellings. The Council has removed this document from its website since the commencement of the consultation process. The Council has, however, in its Council's latest Authority Monitoring Report on Housing (2014/15, page 18), provided for a range of 200 to 300 new dwellings.

The Council is invited to re-affirm in the Local Plan that, save as follows, planning applications for the Site should propose no more than 200 to 300 dwellings (and certainly no more than 390). The Council acknowledged this in its responses to representations made in relation to the draft Local Plan made available in summer 2016.

That number should be subject to downward revision should the Council persist with the idea of a secondary school of c. 1,400 people instead of a primary school of c. 400 people. The Council should be explicit on this point in the Local Plan.

To the extent any deviation is otherwise considered appropriate, it should be demonstrably justified with reference to a change in law since the 2011 APB was adopted; the status quo previously consulted upon should generally be preserved.

In any event, the Other Uses favoured by the community must not be disproportionately disadvantaged by any decision to increase the Residential Uses or secondary education uses.

Finally, and taking a step back, the stated overriding objective is to deliver a new village heart for Mortlake. It forms part of the Village Plan. A village of the type the community demonstrably wishes to construct is not one overshadowed by high-density, sky-scrapers.



**Rep 4A – The ‘reprovision’ of the playing fields on the Site is not feasible and failure to achieve ‘reprovision’ would breach the Local Plan’s stated Strategic Objectives**

Issue: The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) refers to ‘the retention and/or reprovision and upgrading of the playing field’. ‘Reprovision’ is undefined. However, absent plans for the Site, it appears almost inconceivable that two playing fields (or one if just one is moved) could be provided elsewhere on the site. If so, that would be inconsistent with the self-stated strategic objectives for the plan.

Detail: The playing fields represent a significant portion of the site, measuring approximately two hectares. For reference, refer to page 5 of the following site marketing document (copyright acknowledged):

<https://www.geraldeve.com/wp-content/uploads/2015/08/Stag-Brewery-Mortlake-Brochure.pdf>

They house two playing fields. Those playing fields are enjoyed by many local residents for sports activities and sports groups (such as Barnes Eagles), as well as affording residents an attractive green space. Other organisations also use the space during the week: for instance, they are used by the local primary school (Thomson House) which does not have a playing field and by the police to train dogs.

The playing fields have been a green space for as long as any local residents can remember.

Indeed, such is the importance of the playing fields to the Site and the local area, that the Council saw fit, after a full statutory consultation process, to protect them for generations to come when adopting the 2011 APB.

However, without consultation, the Council now seeks in the Draft Local Plan to remove the protection afforded to this green space, by providing for it to be re-provided elsewhere. This proposal was not present in earlier drafts of the Local Plan and it is unclear at whose request the proposal has been included: it is certainly not at the request of local residents and users of the facility.

In exercising its functions in the context of planning decisions, the Council must take into account the availability of green space and the need to protect it. It should also take into account the views of residents and other users of the site.

By failing to identify an alternative location on the Site for the playing fields (or one, if only one is to be re-provided) the Council has not discharged this duty.

Further, failure to ensure that these spaces are protected is inconsistent with the Strategic Objectives set out in section 2.3 of the Draft Local Plan. In particular, the following provisions are relevant:

**Protecting Local Character**

1. ‘Maintain and enhance the borough’s attractive villages, including the unique, distinctive and recognisable local characters of the different village areas and their sub-areas’: the

playing fields are distinctive in character and mark a step-change in scenery when passing along the Lower Richmond Road.

2. ‘Protect and, where possible, enhance the environment including historic assets; retain and improve the character and appearance of established residential areas, and ensure new development and public spaces are of high quality design’: removal of the playing field and trees would not enhance the environment.

3. ‘Protect and improve the borough’s parks and open spaces to provide a high quality environment for local communities and provide a balance between areas for quiet enjoyment and wildlife and areas to be used for sports, games and recreation’: as per point 2.

5. ‘Protect and enhance the borough’s biodiversity, including trees and landscape, both within open spaces but also within the built environment and along wildlife corridors.’: as per point 2.

**A Sustainable Future**

3. ‘Optimise the use of land and resources by ensuring new development takes place on previously developed land, reusing existing buildings and encouraging remediation and reuse of contaminated land.’: any new development of greenfield sites, such as the playing fields, would not be consistent with this.

4. ‘Reduce or mitigate environmental impacts and pollution levels (such as air, noise, light, odour, fumes water and soil) and encourage improvements in air quality, particularly along major roads and areas that already exceed acceptable air quality standards’: replacing green open space with a use that will add vehicular traffic to an area which already suffers from unsafe emissions levels, some of the highest in the Borough, is clearly at odds with this.

5. ‘Ensure local environmental impacts of development are not detrimental to the health, safety and the amenity of existing and new users or occupiers of a development or the surrounding area’: removing the green space would negatively impact the amenity of local residents and users of the space, and may for the reasons set out above negatively impact health.

11. ‘Create attractive and pleasant environments and spaces that promote active and healthy lifestyles, including recognising their benefits to residents’ social life and their economic benefits to the borough’s centres.’: removing green space used for sports is not conducive to achieving this objective.

Accordingly, the reference to ‘and/or re-provision’ must be deleted and the playing fields should be expressly be afforded the protection which the 2011 APB sought to afford the playing fields.

**Rep 4B – The ‘reprovision’ of the playing fields is not possible in light of existing tree preservation orders**

Issue: The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) refers to ‘the retention and/or reprovision and upgrading of the playing field’. ‘Reprovision’ is undefined. Re-provision would likely entail the removal of trees which, I understand, are the subject of a tree preservation order.

Detail: The playing fields represent a significant portion of the site, measuring approximately two hectares. For reference, refer to page 5 of the following site marketing document (copyright acknowledged):

<https://www.geraldeve.com/wp-content/uploads/2015/08/Stag-Brewery-Mortlake-Brochure.pdf>

They house two playing fields and have at the north- western, north-eastern and southern boundaries a number of trees. Those trees are, I understand, the subject of a tree preservation order, details of which can be provided on request by Mortlake Brewery Community Group.

If re-provision of the playing fields would result in the removal of those trees, that would (absent an applicable exception) be a breach of the preservation order.

The Draft Local Plan must not promote a proposal that would constitute a breach of law; nor should it promote a proposal that is impossible to deliver.

Accordingly, the reference to ‘and/or re-provision’ must be deleted and the presence of the tree preservation order should be expressly acknowledged.

**Rep 4C – The ‘reprovision’ of the playing fields on the Site would cause a pending application for a designated Local Green Space, if granted, to be prematurely over-ridden**

Issue: The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) refers to ‘the retention and/or reprovision and upgrading of the playing field’. ‘Reprovision’ is undefined. The playing fields are the subject of a pending application for designation as a Local Green Space. If afforded that designation, as I believe it should be, re-provision of the playing fields would not be permitted.

Detail: The playing fields represent a significant portion of the site, measuring approximately two hectares. For reference, refer to page 5 of the following site marketing document (copyright acknowledged):

<https://www.geraldeve.com/wp-content/uploads/2015/08/Stag-Brewery-Mortlake-Brochure.pdf>

They house two playing fields. Those playing fields are enjoyed by many local residents for sports activities and sports groups (such as Barnes Eagles), as well as affording residents an attractive green space. Other organisations also use the space during the week: for instance, they are used by the local primary school (Thomson House) which does not have a playing field and by the police to train dogs.

The playing fields have been a green space, special for many reasons, for as long as any local residents can remember.

Indeed, such is the importance of the playing fields to the Site and the local area, that the Council saw fit, after a full statutory consultation process, to protect them for generations to come when adopting the 2011 APB.

In order to formalise that protection, an application has been made by letter dated on or about 15 February 2017 to designate the playing fields as a Local Green Space pursuant to the National Planning Policy Framework. There appears to be a prima facie strong case for the playing fields to receive that designation, for the reasons set out in the letter.

As per section 1.1.5 of the Draft Local Plan, councils must take into account the National Planning Policy Framework when formulating the Local Plan.

If that application is successful, as it is expected to be, it would not be possible to re-provide for the playing fields elsewhere.

Accordingly, the reference to ‘and/or re-provision’ must be deleted (or made subject to the pending Local Green Space application) and the playing fields should in any event be expressly be afforded the protection which the 2011 APB sought to afford the playing fields.

~~Original~~Suggested amended text

8.2.11

Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan:

Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college

Stag Brewery, Mortlake: provision of a new ~~6~~2-form of entry ~~secondary~~primary school, ~~including sixth form~~

Ryde House, East Twickenham: provision of a new 2-form of entry primary school

Barnes Hospital, Barnes: provision of 2-form of entry primary school

13.1.7 A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population.

Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses:

Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college

Stag Brewery, Mortlake: provision of a new ~~6~~2-form of entry ~~secondary~~primary school, ~~including sixth form~~

Ryde House, East Twickenham: provision of a new 2-form of entry primary school

Barnes Hospital, Barnes: provision of 2-form of entry primary school

SA 24 Stag Brewery, Lower Richmond Road, Mortlake

The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new ~~6~~2-form entry ~~secondary~~primary school, ~~plus sixth form~~, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and ~~/or re-provision and~~ upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.

- The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities.
- The brewery operations on this site have ceased at the end of 2015; the site has been marketed and sold.
- There is a need to create a new village heart and centre for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities.
- There is a clear need for a new ~~6-form-of-entry secondary~~primary school, ~~plus a sixth form,~~ in this area, ~~as set out in the Council's School Place Planning Strategy.~~ Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.
- Whilst this site is not located within a main centre, it falls within the Mortlake Area of Mixed Use. Therefore, it is expected that this site will provide a substantial mix of employment uses (B uses), including lower cost units suitable for small businesses, creative industries and scientific and technical businesses including green technology. Other employment generating uses will also be supported.
- Retail and other commercial uses, such as cafés and restaurants, will add to the vibrancy of the new centre as well as contributing to the provision of important local employment opportunities.
- Incorporating a mix of uses, including social infrastructure and community as well as leisure, sport and health uses, and attractive frontages would contribute to creating an inviting and vibrant new centre.
- The provision of residential uses (including affordable housing), will ensure that the new village heart becomes a vibrant centre for new communities.
- The site is partially within the Mortlake Conservation Area. The existing Buildings of Townscape Merit should be retained; the reuse of these historic buildings offers an excellent opportunity to ensure the site incorporates and promotes a cultural and historic legacy, for example by providing an on-site museum. Any development should respond positively to the Conservation Area, including the setting of the listed buildings (Grade II) to the north of the site.
- Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community.
- There may be an opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site. The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where possible improvements to public transport facilities can be secured as part of any development proposal.
- Guidance on design and local character for the area is also set out in the Mortlake Village Planning Guidance SPD.



**To**  
Planning Policy

**Organisation**  
London Borough of Richmond  
Upon Thames

**Date**  
31 January 2016

**Pre-consultation on Local Plan Consultation from 4 January to 1 February 2016**

Dear Sirs

I write in relation to the pre-consultation in respect of existing local development plans, in particular as they pertain to Mortlake.

**1. BACKGROUND**

I am a resident of Williams Lane and live adjacent to the Stag Brewery site (the *Site*). I acquired the property on construction in December 2011, after publication of the materials referenced below and the public consultation which they followed. I made the purchase in reliance upon those plans, albeit recognising that the final details of any planning consent would need to be addressed at the relevant time. The location of the residences is set out in the Indicative Plan as ‘Approved residential development’; the development on Williams Lane and Wadham Mews was completed in 2012 and is referred to in this letter as the *Trinity Mews Development*.

I have had the benefit of discussing recently many of the matters raised in this letter with the other homeowners of seven houses of the Trinity Mews Development. I believe the position stated accurately reflects the cumulative views of the residents, subject of course to any contrary opinions they may themselves put forward as part of this process.

The presence of the Trinity Mews Development and the views of the homeowners should be properly taken into account when formulating any revisions to the Site use. Residents presently benefit from an abundance of natural light, views over the playing field and/or over low-level brewery buildings permitting sight of the riverside trees and beyond and relative tranquillity. The proposed development, if insensitively pursued, could blight the lives of the residents and negatively impact real estate values both during the construction phase and years to come. Particular regard should be had to the matters specified under ‘Amenity’ in section 5.12 of the 2011 Brief.

In making the representations set out in this letter, I have reviewed the following documents:

- (a) “Supplementary Planning Document Stag Brewery, Mortlake, SW14 Planning Brief Adopted July 2011” (the *2011 APB*) – found at [http://www.richmond.gov.uk/stag\\_brewery\\_2010-2.pdf](http://www.richmond.gov.uk/stag_brewery_2010-2.pdf) - which was formulated on the back of a public consultation;
- (b) “Stag Brewery, Mortlake, SW14 Planning Brief Supplementary Planning Document” (undated) (the *2011 Brief*) – found at

[http://www.richmond.gov.uk/5314\\_document\\_final\\_rev5.pdf](http://www.richmond.gov.uk/5314_document_final_rev5.pdf) – incorporating an Indicative Land Use Plan;

- (c) Appendix 1, dated December 2011:- found at [http://www.richmond.gov.uk/stag\\_brewery\\_2010\\_maps\\_opt.pdf](http://www.richmond.gov.uk/stag_brewery_2010_maps_opt.pdf). the plan on page 26 (‘Council’s vision’) is referred to in this letter as the *2011 Indicative Plan*; and
- (d) a document entitled ‘The purpose of the consultation’ (undated) – found at [http://www.richmond.gov.uk/stag\\_brewery.pdf](http://www.richmond.gov.uk/stag_brewery.pdf) (the *Consultation Solicitation Document*).

I am also familiar with the local development plans formulated since the date of these documents, all of which endorsed the conclusions from the earlier documents; indeed, as regards the Stag Brewery site, the Local Village Plans cross-refers in most places to the outcome of the recent consultation, in view of the Adopted Planning Brief which was in place. This includes the Supplementary Planning Document entitled ‘Mortlake Village Planning Guidance’ dated September 2015 and approved in January 2016 – found at <http://cabnet.richmond.gov.uk/documents/s59326/Appendix%201%20-%20Mortlake%20draft%20Village%20Planning%20SPD.pdf> (the *Village Planning Guidance*).

**2. SECONDARY SCHOOL ON THE SITE**

- 2.1 I have become aware of recent plans to introduce – unilaterally, and without due consultation – significant changes to the 2011 APB through the medium of the School Place Planning Strategy. Those changes, providing for a six-form entry secondary school, are material in size and nature; risk entirely prejudicing the deliverability of the original 2011 APB and its objectives; and will necessarily cut across numerous other matters the Council is, in some cases legally, obligated to take into account in formulating policy, many of which are identified in Appendix 1 ‘Local Plan Consultation from 4 January to 1 February 2016’.
- 2.2 I wrote by email to a Councillor seeking clarification on these matters three months ago; I have yet to receive a response. I also have further questions. Suffice to say, I remain to be convinced as to the legality of the decision, and the process by which it was reached. Accordingly, I reserve, *inter alia*, the right to seek judicial review of that decision. The purchaser of the Site will doubtless also take legal advice on a matter which only came to light very late on in the marketing process, and possibly after bids had been submitted.
- 2.3 Against that background, I consider it prudent for the Council to proceed on the basis of dual plans: one for a primary school, which has the demonstrable support of the local community, and one for a secondary school.

**3. OBJECTIVE OF THE VILLAGE PLAN AND FOR THE SITE**

- 3.1 *2011 Brief*: The stated overall vision is “*based on the desire to provide a new village heart for Mortlake based upon buildings and open public realm of the highest quality that will radically transform Mortlake whilst respecting the character and history of the area. The site should provide a new recreational and living quarter with a mix of uses, creating vibrant links between the River and the town, and enlivening the Riverside frontage and Mortlake High Street, fully realising this unique opportunity for the Mortlake community.*”

- 3.2 I would urge the Council to keep this admirable objective, which I wholly endorse, in mind throughout the process when formulating plans and/or reviewing planning consent requests. As stated above, it is almost impossible to reconcile this stated aim with the inclusion of a secondary school on the Site.

#### 4. SITE USE

- 4.1 **2011 APB:** the conclusions of the 2011 APB remain broadly appropriate. Per section 1.17: *“The conclusion from the consultation was that the lower density high quality housing schemes with community benefits including a primary school/ community hub, open space including retention of existing playfields and creation of new open space links), leisure uses such as a museum, craft centre, café and community space and boat house and small scale employment spaces was the most favoured approach.”*
- 4.2 **2011 Indicative Plan:** this plan remains mostly appropriate. However, as regards the site of the primary school/community hub, I favoured the alternative plans contained in the Consultation Solicitation Document, which put the primary school alongside the playing field. This was largely because, from a practical perspective, I simply do not see how a low-level primary school, even if single-form entry, could fit within the allocated space. Logistically, assuming the bus depot is relocated to the Site, it would also be preferable for the depot to be closer to the school, and this would allow a small staff car park to be included in the space shown for the school at the northern perimeter of the playing field.
- 4.3 In any event, notwithstanding my comments on the planned secondary school, if that were to replace the small primary school/community hub indicated in the plans and supported by the public, it would surely need to be moved to occupy the land presently identified as ‘Residential – 6-7 story’ towards the middle of the Site.
- 4.4 If the site incorporates a secondary school, and not ‘community use’, it is important that the community hub be relocated to engender a village feel consistent with to overall objectives. This may require a smaller residential allocation.
- 4.5 The retention of the playing fields remains of significant importance. Further uses could, however, be added, as this is currently limited, as far as I can tell, to Sunday morning football and the annual village fete. The viability of this would of course be subject to implementation of appropriate parking arrangements: attendees for football matches on Sundays at present park in an uncontrolled zone on Williams Lane which severely impedes use of the road by other vehicles and by pedestrians on the pavement.
- 4.6 **Village Planning Guidance:** I endorse the objectives set out at section 2.3 of the Village Planning Guidance adopted in January of this year. I note the reference to a school (of any kind) has been omitted.

#### 5. APPEARANCE OF DEVELOPMENT

- 5.1 **2011 APB:** the conclusions of the 2011 APB remain broadly appropriate. Per section 2.37: Key issues will include: *“The visual relationship of the site to the surrounding area, including views up and down stream and across the River Thames, together with key views*

*towards and into the site; the existing urban grain and scale (Appendix 1, Plan 7); the opportunity to significantly enhance the character and appearance of the area through high quality development; permeability and specifically, the opportunity to visually and functionally link the site with surrounding areas and with the substantial riverside frontage; the incorporation of the principles of sustainable design and construction.”.*

- 5.2 And section 5.30: *“Well-proportioned and sensitive architecture is required”.*
- 5.3 Per section 5.26: the three heritage buildings and boundaries should be protected.
- 5.4 **Trinity Mews Development:** any new development adjacent to the Trinity Mews Development should be sympathetic to the housing style found there and throughout Richmond Borough. Further detail on this style is contained in the Village Planning Guidance (Area 6).
- #### 6. HEIGHT OF THE DEVELOPMENT
- 6.1 **DM CC 3 Taller Buildings:** Per ‘Local evidence and need’, the London Plan policy 7.7 concluded that Mortlake is an area where taller buildings will be inappropriate in general. This supports evidence presented in 2008 (referenced at 5.30 of the 2011 APB): *“buildings are typically two to three storeys with the exception of the Mortlake Brewery Granary building which stands as a local landmark at eight storeys”.*
- 6.2 **APB 2011:** the conclusions of the 2011 APB remain broadly appropriate.
- 6.3 Per section 5.31: *“If taller buildings are necessary to ensure a viable scheme higher building could be located at the core of the site, generally where the larger and higher existing buildings are located, and that height and scale diminish towards the perimeter of the site or along the Riverside.”*
- 6.4 And per section 2.38: *“This view was further confirmed at a Public Meeting on 9th December 2010 where potential heights of development ... were again raised as issues, and where the majority voted significantly against any large scale destination uses.”*
- 6.5 **Indicative Plan and Consultation Solicitation Document:** these plans show the maximum heights that would generally be acceptable on the site in view of the planning developments being sought.
- 6.6 Consequently:
- any new development should be fundamentally low-rise, with the exception of certain existing buildings which may (in-keeping with their present appearance), in places, rise to 6-8 stories;
  - the perimeters – including outside the Trinity Mews Development - and the river frontage – should be especially low-rise (maximum 2-3 stories) and must afford existing residences their right to light; and



- (c) in any event, the proposed development must not at any point exceed the height of buildings already on that footprint.

## 7. RESIDENTIAL

- 7.1 **APB 2011**: the low-to-medium density residential scheme advocated by the APB 2011, the 2011 Brief and the 2011 Indicative Plan remains appropriate. This envisaged, in line with the Consultation Solicitation Document, that no more than 390 dwellings should be supported on the site, with low density housing (40-50 dph) to the north of the playing field. Any increase in that number would result in a failure to satisfy the competing objectives of the site, and the overall objective: to create a sustainable, new village heart for Mortlake.
- 7.2 Housing on the north western zone (i.e. beside the Trinity Mews Development) “*should be lower density with heights of up to 3 storeys relating to existing residential ... and create a new street emulating the character of buildings of townscape merit on the Lower Richmond Road.*”
- 7.3 No more than 40% should be allocated to affordable housing, consistent with what has been achieved in comparable developments in neighbouring Boroughs. Of that, most should be made available to key workers.
- 7.4 Per section 5.2 of the 2011 APB, all homes should meet at least Code level 4 of the HCA Code for Sustainable Homes.

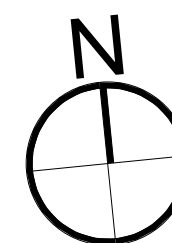
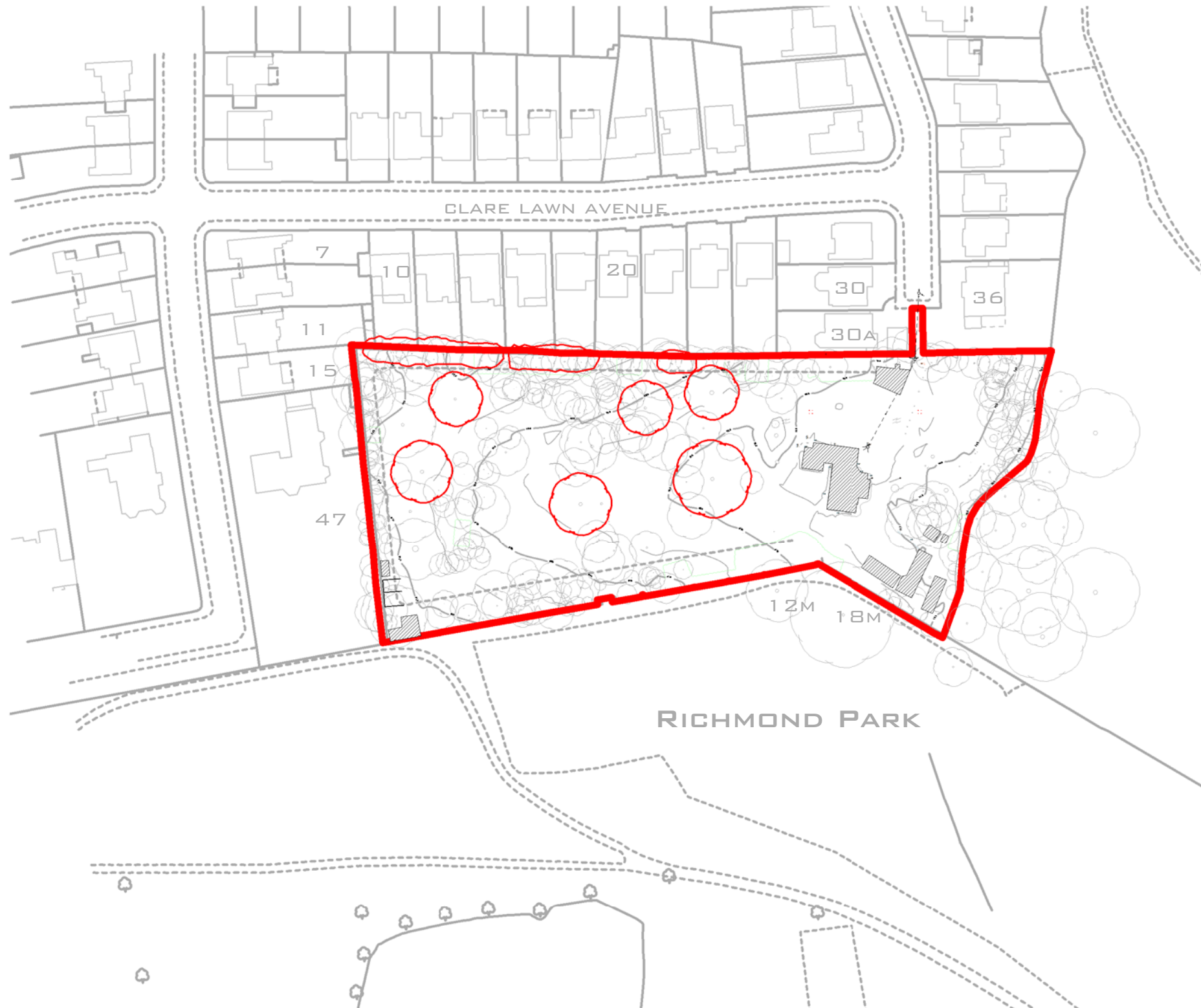
## 8. TRANSPORT AND ACCESS

- 8.1 **APB 2011**: the conclusions of the 2011 APB remain broadly appropriate: Per sections 2.39 to 2.41. “*The site has a PTAL rating of 2. The relationship and proximity of the site to the railway will be a key consideration and the potential for enhancing linkages should be explored as part of any proposal. In addition, the site sits on several bus routes and opportunities should be explored for the integration of the site with the bus network and for new and improved services. The existing bus stop near Bulls Alley gives good access to the Eastern section of the site. Opportunities to link with existing or possible future river transport routes and leisure uses will be actively encouraged.*”
- 8.2 As such:
  - (a) transport provision must be adequately addressed at planning stage – if it cannot be accommodated, the plans must be revised;
  - (b) this should include the relocation of the Mortlake bus terminus to the site, or potentially to the under-utilised land next to Chalkers Corner on the Lower Richmond Road;
  - (c) representations must be made to TfL, Network Rail and South West Trains to increase the provision of rush-hour services to Mortlake Railway Station, which is already substantially over-utilised and merits additional, and fast/semi-fast, services

to London Waterloo, with additional 10-car carriages (see NPPF, paras 29, 32, 35, 38);

- (d) there is presently zero capacity on rush-hour trains: it is impossible to see how the present infrastructure could support a secondary school, less still when coupled with c.390 new dwellings and the c. 140 jobs the Council needs to seek to encourage to the site to replace jobs lost on ABInbev’s divestment;
- (e) extension of riverboat services to the City, or at least Putney to connect with services there, should be seriously considered as a means of alleviating pressure on the railway network and would be consistent with the other strategies which seek to optimize the use of the River;
- (f) the site should allow for ample roadways and paths: Williams Lane is already insufficient for the volume of traffic it now carries following construction of the Trinity Mews Development and lacks road markings and a proper pavement;
- (g) any redevelopment must realistically assess the increased volume of traffic, in what is already, along the Lower Richmond Road in particular, an over-used stretch of road;
- (h) pathways allowing access across the site to the River Thames, to the focal point of the new village and to Mortlake Railway Station (as well as any new bus terminus) should be incorporated;
- (i) the Consultation Solicitation Document referenced potential removal of the path beside Ship Lane: note that one resident already appears to have blocked off part of that passageway, one imagines to use as part of their property; and
- (j) a controlled parking scheme on Williams Lane and environs benefitting residents of the Trinity Mews Development will be required.

Mr. and Mrs. M. R. Millington



This drawing is copyright.  
Contractor must check all  
dimensions on site. Only figured  
dimensions are to be used.  
Discrepancies must be reported  
immediately to the architect  
before proceeding

Notes

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Project

**OXLEY RESIDENCE**  
32 CLARE LAWN AVENUE  
EAST SHEEN  
LONDON SW14

Drawing

**LOCATION PLAN**

Drawn by <b>PMP</b>	Checked by <b>PP</b>	Approved by <b>GA</b>
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Date <b>MAY 2011</b>	Scale <b>1 : 1250 @ A3</b>
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Project <b>0951</b>	Stage <b>P2</b>	Type	Number <b>P003</b>	Revision <b>A</b>
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# Appeal Decision

Site visit made on 16 February 2012

**by Terry G Phillimore MA MCD MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Decision date: 9 March 2012**

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**Appeal Ref: APP/L5810/A/11/2161139**  
**32 Clare Lawn Avenue, London SW14 8BG**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
  - The appeal is made by Mr & Mrs Simon Oxley against the decision of the Council of the London Borough of Richmond-upon-Thames.
  - The application Ref DC/AWL/11/1473/FUL, dated 9 May 2011, was refused by notice dated 5 September 2011.
  - The development proposed is demolition of existing dwelling and ancillary buildings and erection of a new detached two storey dwelling with basement.
- 

## Decision

1. The appeal is allowed and planning permission is granted for demolition of existing dwelling and ancillary buildings and erection of a new detached two storey dwelling with basement at 32 Clare Lawn Avenue, London SW14 8BG in accordance with the terms of the application, Ref DC/AWL/11/1473/FUL, dated 9 May 2011, subject to the conditions set out in the attached schedule.

## Procedural Matters

2. Permission has previously been granted for the erection of a replacement dwelling on the site. This was renewed on 19 January 2010 (ref 09/0663/FUL). The extant permission is referred to by the appellants as a fallback position, which is likely to be implemented in the event of permission for the appeal scheme not being forthcoming. This likelihood is not disputed.

## Main Issues

3. The main issues are:
  - a) whether the proposal is inappropriate development in Metropolitan Open Land and the impact it would have on Metropolitan Open Land;
  - b) the effect the development would have on the character and appearance of the area including the setting of Richmond Park;
  - c) the impact the development would have on biodiversity;
  - d) if the proposal is inappropriate development, whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations, so as to amount to the very special circumstances necessary to justify such development.

## Reasons

4. The site comprises a 1950s two-storey house at the east end of a large plot of around 1ha adjacent to Richmond Park, which lies to the south. There are stables in the south-east corner of the site, and a car port and shed near the northern boundary. There are many trees within the site, which is the subject of a tree preservation order. The site is covered by Metropolitan Open Land (MOL) designation.
5. Under policy 7.17 of the London Plan 2011, MOL is given the same level of protection as Green Belt. Policy CP10 of the Richmond-upon-Thames Core Strategy 2009 seeks to safeguard MOL, among other designated land. Policy DM OS 2 of the Development Management Plan (DMP) 2011, adopted since the Council's decision, also seeks to protect MOL and retain this in predominately open use. It sets out criteria for judging exceptional cases of appropriate development.
6. Both the London Plan and the DMP refer to the policy guidance in PPG2 on Green Belts as applying to MOL. PPG2 provides advice for determining whether development is inappropriate, with paragraph 3.6 stating that the replacement of existing dwellings need not be inappropriate providing the new dwelling is not materially larger than the one it replaces.
7. In making the comparison in this case, the baseline is the existing dwelling rather than the previously permitted scheme. Various indicators are relevant in assessing whether the proposal would be materially larger than the existing dwelling. There are some differences in the dimensions put forward by the appellants and the Council, but the range of these can be taken as providing a reasonable comparative guide.
8. Starting with footprint, this would increase from around 180m<sup>2</sup> to over 950m<sup>2</sup>. Even including outbuildings to be demolished (totalling 160-212m<sup>2</sup>), this would be a very considerable increase. It is not appropriate to add the area of impermeable surfaces within the site to the existing footprint, or deduct the area of green roofs from the proposal, since these elements have minor significance to the comparison of scale of built development in this case.
9. With respect to floorspace, this would increase from around an existing 345m<sup>2</sup> to around 1064m<sup>2</sup> with the proposal. This does not include the basement area, which with the particular design features would be likely to have little impact on the intensity of activity on the site given the ancillary facilities it would contain.
10. The maximum height of building would be slightly reduced, and the dimensions of the east and west elevations would be similar between the existing and proposed houses. However, the south and north elevations would be considerably extended, including an increase in span at first floor level from around 15.5m existing to 30m with the proposal. The bulk and prominence of built development within the site would be greater due to the increased mass and spread of the proposed dwelling.
11. Taking all these factors into account, the proposed dwelling would be significantly larger than the one it would replace. The proposal is therefore inappropriate development in the MOL.

12. Although the site is in private ownership, it has a largely open nature. This is consistent with the quality of openness which the development plan policies identify as a key feature of MOL. With the proposal there would be an expansion of built development towards the centre of the site, with a consequent material reduction in the openness of the MOL. This is in addition to the harm in principle as a result of the inappropriate development. The proposal conflicts with the development plan's protection of MOL.

*Fallback comparison*

13. The approved dwelling would have a footprint of around 450-516m<sup>2</sup> and a floorspace of some 849m<sup>2</sup>. Therefore in these respects it would be smaller than the current proposal. However, its ridge would be significantly higher, and there would be a greater bulk at the upper level, giving an increased prominence. Overall, the permitted scheme would to a limited degree have a lesser impact in terms of erosion of openness of MOL than the current proposal.

**Character and appearance**

14. The site comprises a large residential curtilage within a low density suburban townscape, rather than a location with a semi-rural character.
15. The proposed dwelling would have extensive flat roofs, part of which would be a green roof, with sandstone and timber cladding to the walls. The Council raises no objection in principle to the contemporary design style of the proposal. Due to its relatively low form and set back position, the building would be unobtrusive from the road. The development would not result in urbanisation of the site.
16. The building would be seen from Richmond Park over the boundary wall. This is a Grade 1 listed park and public open space, and a Conservation Area. The existing house is visible above the wall, as are others along this section of the boundary. Due to the width of the first floor element and overhanging roof of the proposed dwelling, an increased scale of built form would be apparent from the Park. However, the maximum height would be slightly lower than the existing house, and the building would not project so closely towards the Park. The design features would be sympathetic to the Park setting, with no harmful erosion of the open character. There would be no material conflict with policies DM OS 3, DM OS 4, DM OS 6, DM HD 1 or DM DC 1 by way of intrusion on the Park setting or incompatibility with the character of the surroundings.

*Fallback comparison*

17. The permitted house would project closer to the Park than the proposal. It is a building in neo classical style, with a steep pitched roof and a roof balcony. Due to its height, massing and design features it would be very prominent in the view from the Park, and result in a substantial visual intrusion in the Park's setting by comparison with the current replacement dwelling scheme.

**Biodiversity**

18. The Park is a Site of Special Scientific Interest, National Nature Reserve and Special Area of Conservation. Nearby Palewell Common is designated as an Other Site of Nature Importance.

19. The application was accompanied by surveys on protected species and habitats. No objections have been raised in relation to the findings of these, with scope to deal with impact during construction and mitigation by way of condition.
20. Concern has been raised about the potential impact of light overspill on wildlife habitats. The proposal would increase the extent of glazing facing the Park, but at a greater distance. The application was accompanied by information on design measures to minimise the impact of light, and these could be incorporated by condition together with control on external lighting.
21. Subject to conditions on tree protection and new planting, there are no objections on tree grounds.
22. The proposal would not breach the biodiversity objectives of policy DM OS 5.

### **Overall balance**

23. The proposal is inappropriate development in MOL, and would result in an erosion of openness in addition to harm by reason of inappropriateness. It would reduce openness more than the fallback alternative.
24. There would be no material harm to the setting of Richmond Park or the character and appearance of the area. By comparison, the fallback scheme would have a much greater prominence and degree of visual intrusion.
25. Biodiversity interests could be secured by conditions.
26. The benefits of the current scheme over the fallback development in terms of effect on the character and appearance of the area clearly outweigh the harm to the MOL and the resultant conflict with policy. As such very special circumstances exist to justify allowing the proposal.

### **Conditions**

27. In order to ensure a satisfactory appearance, control over materials is necessary. The context of the MOL location provides the justification needed for removal of permitted development rights relating to enlargements and development within the curtilage of the dwelling in order to safeguard openness, but not to extend this to cover any external alterations. However, control over further windows is needed since additional light sources could adversely affect wildlife.
28. Trees on the site require protection during the development. The model condition in Circular 11/95 provides an appropriate form for this, avoiding what in this case would be over-detailed requirements in the Council's suggested condition and having regard to the survey information already submitted. The tree constraints plan covering the eastern part of the site provides a reasonable geographical extent for this control, as suggested by the appellants. To safeguard the appearance of the MOL, landscaping is needed together with tree protection for any tree planting that forms part of the approved scheme.
29. The findings of the submitted ecological reports provide recommendations that should be incorporated in the development to safeguard biodiversity. Statutory protection would apply to any protected species that are found during the works, and further controls through more onerous conditions are not necessary.

30. Lighting details should be controlled to safeguard wildlife.

31. A condition specifying the approved plans is needed for the avoidance of doubt and in the interests of proper planning

### **Conclusion**

32. For the reasons given above I conclude that the appeal should be allowed.

*T G Phillimore*

INSPECTOR

### **Schedule of Conditions**

- 1) The development hereby permitted shall begin not later than three years from the date of this decision.
- 2) No development shall take place until samples of the materials to be used in the construction of the external surfaces of the building and hard surfacing hereby permitted have been submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details.
- 3) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking, re-enacting or modifying that Order), no enlargement shall be carried out of the building hereby permitted.
- 4) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking, re-enacting or modifying that Order), no building, enclosure or swimming pool shall be erected within the curtilage of the dwelling hereby permitted other than those expressly authorised by this permission.
- 5) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking, re-enacting or modifying that Order), no windows/dormer windows other than those expressly authorised by this permission shall be constructed in the building hereby permitted.
- 6) In this condition "retained tree" means an existing tree which is to be retained, within the area shown covered by the submitted Tree Constraints Plan Figure 1 Sheet 1 (drawing no. 6515.01.01), in accordance with the approved plans and particulars; and paragraphs (i) and (ii) below shall have effect until the expiration of 5 years from the date of the occupation of the building for its permitted use.
  - i) No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved plans and particulars, without the written approval of the local planning authority. Any topping or lopping approved shall be carried out in accordance with British Standard 3998 (Tree Work).
  - ii) If any retained tree is removed, uprooted or destroyed or dies, another tree shall be planted at the same place and that tree shall



- be of such size and species, and shall be planted at such time, as may be specified in writing by the local planning authority.
- iii) The erection of fencing for the protection of any retained tree shall be undertaken, in accordance with a method statement that shall be submitted to and approved in writing by the local planning authority, before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the written approval of the local planning authority.
- 7) No development shall take place until full details of both hard and soft landscape works have been submitted to and approved in writing by the local planning authority and these works shall be carried out as approved. These details shall include proposed finished levels or contours; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting etc); proposed and existing functional services above and below ground (e.g. drainage, power, communications cables, pipelines etc. indicating lines, manholes, supports etc.); retained historic landscape features and proposals for restoration, where relevant.
- 8) Soft landscape works shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; implementation programme.
- 9) All hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the occupation of any part of the development or in accordance with the programme agreed with the local planning authority.
- 10) If within a period of 5 years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place, unless the local planning authority gives its written approval to any variation.
- 11) The recommended protection and mitigation measures for badgers and stag beetles contained in the submitted Phase 1 Habitat Survey dated March 2011 and letter from Colin Plant Associates (UK) dated 1 March 2011 shall be fully implemented during the carrying out of the development.
- 12) The dwelling shall achieve Level 3 of the Code for Sustainable Homes. The dwelling shall not be occupied until a final Code Certificate has been issued for it certifying that Code Level 3 has been achieved.
- 13) Details of any external lighting shall be submitted to and approved in writing by the local planning authority before the building is occupied. A scheme of measures to restrict light overspill from the site shall also be

submitted to and approved in writing by the local planning authority, to include details of luminance from internal and external lighting plotted with predicted lux levels post re-development. Development shall be carried out in accordance with the approved details and thereafter permanently retained as such.

- 14) The development hereby permitted shall be carried out in accordance with the following approved plans: P001, P002, P003, P100, P101, P200, P300, P301, P310, JKK6515 1A, 6515.01.01, 6515.01.02, comparative site plan 01, comparative site plan 02.

## Soundness Self-Assessment Checklist (March 2014)

*This note was prepared by AMEC and URS on behalf of the Planning Advisory Service. It aims to help local authorities prepare their plans in advance of an examination, taking into account the requirements of the National Planning Policy Framework. A separate checklist looks at legal compliance.*

**In summary – the key requirements of plan preparation are:**

- Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?
- Is the plan justified?
- Is it based on robust and credible evidence?
- Is it the most appropriate strategy when considered against the alternatives?
- Is the document effective?
- Is it deliverable?
- Is it flexible?
- Will it be able to be monitored?
- Is it consistent with national policy?

### **The Tests of Soundness at Examination**

The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria.

The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182): “The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is ‘sound’ “, namely that it is:

#### **1. Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements**

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF, together with the Marine Policy Statement (MPS) set out principles through which the Government expects sustainable development can be achieved.

#### **2. Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence**

This means that the DPD should be based on a robust and credible evidence base involving:

## Soundness Self-Assessment Checklist (March 2014)

- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

### **3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities**

This means the DPD should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

### **4. Consistent with national policy: enabling the delivery of sustainable development**

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy [www.planningportal.gov.uk](http://www.planningportal.gov.uk)). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared. Please don't assume that you have got to provide all of these, they are just suggestions of what could be relevant.

In addition, the Legal Compliance checklist (a separate document, see [www.pas.gov.uk](http://www.pas.gov.uk)) should be completed to ensure that this aspect is covered.

The Duty to Co-operate will also be assessed as part of the examination process.

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<b><i>Positively Prepared:</i></b> the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.		
<p><b><i>Vision and Objectives</i></b></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> <li>• Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed.</li> <li>• Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them.</li> <li>• The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another.</li> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning.</li> <li>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery.</li> <li>• Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.</li> </ul>	
<p><b><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></b></p> <p>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for</p>	<ul style="list-style-type: none"> <li>• An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective', below).</li> <li>• An audit trail showing how and why the quantum of development, preferred overall strategy and plan area</li> </ul>	

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>achieving sustainable development in different areas.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <p>—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; or</p> <p>—specific policies in this Framework indicate development should be restricted.</p>	<p>distribution of development were arrived at.</p> <ul style="list-style-type: none"> <li>Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)</li> </ul>	
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<ul style="list-style-type: none"> <li>A policy or policies which reflect the principles of the presumption in favour of sustainable development (see <a href="http://www.planningportal.gov.uk">model policy at www.planningportal.gov.uk</a>)</li> </ul>	
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<ul style="list-style-type: none"> <li>Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs.</li> <li>Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.</li> </ul>	

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements		Possible Evidence	Evidence Provided
<b>NPPF Principles: Delivering sustainable development</b>			
<b>1. Building a strong, competitive economy (paras 18-22)</b>			
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	<ul style="list-style-type: none"> <li>• Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.</li> </ul>		
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<ul style="list-style-type: none"> <li>• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement.</li> <li>• An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)</li> </ul>		
<b>2. Ensuring the vitality of town centres (paras 23-37)</b>			
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	<ul style="list-style-type: none"> <li>• The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.</li> </ul>		
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)	<ul style="list-style-type: none"> <li>• An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses.</li> <li>• Primary and secondary shopping frontages identified and allocated.</li> </ul>		



## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<b>3. Supporting a prosperous rural economy (para 28)</b>		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	<ul style="list-style-type: none"> <li>Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities.</li> </ul>	
<b>4. Promoting sustainable transport (paras 29-41)</b>		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes</p>	<ul style="list-style-type: none"> <li>Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31.</li> <li>Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35.</li> <li>A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision.</li> <li>Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes.</li> <li>If local (car parking) standards have been prepared, are they justified and necessary? (39)</li> <li>Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.</li> </ul>	

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		
<p><b>5. Supporting high quality communications infrastructure (paras 42-46)</b></p>		

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<ul style="list-style-type: none"> <li>Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.</li> </ul>	
<b>6. Delivering a wide choice of high quality housing (paras 47-55)</b>		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<ul style="list-style-type: none"> <li>Identification of:               <ul style="list-style-type: none"> <li>a) five years or more supply of specific deliverable sites; plus the buffer as appropriate</li> </ul> </li> <li>Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48)</li> <li>A SHLAA</li> </ul>	
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<ul style="list-style-type: none"> <li>Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15</li> </ul>	
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)</p>	<ul style="list-style-type: none"> <li>A housing trajectory</li> <li>Monitoring of completions and permissions (47)</li> <li>Updated and managed SHLAA. (47)</li> </ul>	
<p>Set out the authority's approach to housing density to reflect local circumstances (47).</p>	<ul style="list-style-type: none"> <li>Policy on the density of development.</li> </ul>	

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	<ul style="list-style-type: none"> <li>• Policy on planning for a mix of housing (including self-build, and housing for older people)</li> <li>• SHMA</li> <li>• Identification of the size, type, tenure and range of housing required in particular locations, reflecting local demand. (50)</li> <li>• Evidence for housing provision based on up to date, objectively assessed needs. (50)</li> <li>• Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50)</li> </ul>	
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> <li>• Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs.</li> <li>• Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53)</li> <li>• Examples of special circumstances to allow new isolated homes listed at para 55.</li> </ul>	
<b>7. Requiring good design (paras 56-68)</b>		
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	<ul style="list-style-type: none"> <li>• Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues</li> </ul>	
<b>8. Promoting healthy communities (paras 69-77)</b>		

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies on inclusive communities.</li> <li>• Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)</li> </ul>	
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies addressing community facilities and local service.</li> <li>• Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.</li> </ul>	
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	<ul style="list-style-type: none"> <li>• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73)</li> <li>• A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74)</li> <li>• Protection and enhancement of rights of way and access. (75)</li> </ul>	
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).	<ul style="list-style-type: none"> <li>• Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a</li> </ul>	

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	local green space should be consistent with policy for Green Belts. (78)	
<b>9. Protecting Green Belt land (paras 79-92)</b>		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)</p>	<ul style="list-style-type: none"> <li>• Where Green Belt policies are included, these should reflect the need to:               <ul style="list-style-type: none"> <li>○ Enhance the beneficial use of the Green Belt. (81)</li> <li>○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)</li> <li>○ Specify that inappropriate development should not be approved except in very special circumstances. (87)</li> <li>○ Specify the exceptions to inappropriate development (89-90)</li> <li>○ Identify where very special circumstances might apply to renewable energy development. (91)</li> </ul> </li> </ul>	
<b>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</b>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<ul style="list-style-type: none"> <li>• Planning of new development in locations and ways which reduce greenhouse gas emissions.</li> <li>• Support for energy efficiency improvements to existing building.</li> <li>• Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings policy .</li> </ul>	

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	(95))	
Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)	<ul style="list-style-type: none"> <li>• A strategy and policies to promote and maximise energy from renewable and low carbon sources,</li> <li>• Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</li> <li>• Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97)</li> </ul>	
Minimise vulnerability to climate change and manage the risk of flooding (99)	<ul style="list-style-type: none"> <li>• Account taken of the impacts of climate change. (99)</li> <li>• Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100)</li> <li>• Policies to manage risk, from a range of impacts, through suitable adaptation measures</li> </ul>	
Take account of marine planning (105)	<ul style="list-style-type: none"> <li>• Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation</li> <li>• Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development</li> <li>• Integrate as appropriate marine policy objectives into emerging policy</li> <li>• Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS</li> </ul>	
Manage risk from coastal change (106)	<ul style="list-style-type: none"> <li>• Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas.</li> <li>• Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where</li> </ul>	



## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	appropriate.	
<b>11. Conserving and enhancing the natural environment (paras 109-125)</b>		
Protect valued landscapes (109)	<ul style="list-style-type: none"> <li>• A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure.</li> <li>• Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs.</li> </ul>	
Prevent unacceptable risks from pollution and land instability (109)	<ul style="list-style-type: none"> <li>• Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity.</li> </ul>	
Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)	<ul style="list-style-type: none"> <li>• Identification and mapping of local ecological networks and geological conservation interests.</li> <li>• Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species</li> </ul>	
<b>12. Conserving and enhancing the historic environment (paras 126-141)</b>		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	<ul style="list-style-type: none"> <li>• A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk.</li> <li>• A map/register of historic assets</li> <li>• A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)</li> </ul>	
<b>13. Facilitating the sustainable use of minerals (paras 142-149)</b>		
It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country	Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas;	

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	
<p><b>Justified:</b> <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> <li>• Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area.</li> <li>• The most appropriate strategy when considered against reasonable alternatives.</li> </ul>		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> <li>• The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by.</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>• Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences.</li> </ul>	

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>OR</p> <ul style="list-style-type: none"> <li>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).</li> </ul>	
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> <li>Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies.</li> <li>An audit trail of how the evidence base, consultation and SA have influenced the plan.</li> <li>Sections of the SA Report showing the assessment of options and alternatives.</li> <li>Reports on how decisions on the inclusion of policy were made.</li> <li>Sections of the consultation document demonstrating how options were developed and appraised.</li> <li>Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.</li> </ul>	
<p><b><i>Effective:</i></b> the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> <li>Be deliverable</li> <li>Demonstrate sound infrastructure delivery planning</li> <li>Have no regulatory or national planning barriers to its delivery</li> </ul>		

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> <li>• Have delivery partners who are signed up to it</li> <li>• Be coherent with the strategies of neighbouring authorities</li> <li>• Demonstrate how the Duty to Co-operate has been fulfilled</li> <li>• Be flexible</li> <li>• Be able to be monitored</li> </ul>		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> <li>• Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</li> <li>• Are the policies internally consistent?</li> <li>• Are there realistic timescales related to the objectives?</li> <li>• Does the DPD explain how its key policy objectives will be achieved?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives.</li> <li>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans).</li> <li>• Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.</li> <li>• Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).</li> </ul>	
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> <li>• Have the infrastructure implications of the policies clearly been identified?</li> <li>• Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</li> <li>• Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?</li> </ul>	<ul style="list-style-type: none"> <li>• A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward.</li> <li>• A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate.</li> <li>• Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues.</li> <li>• Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.</li> </ul>	

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> <li>Sections of the DPD that reflect the plans or strategies of the local authority and other bodies</li> <li>Policies which seek to pull together different policy objectives</li> <li>Expressions of support/representations from bodies responsible for other strategies affecting the area</li> </ul>	
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> <li>Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?</li> <li>Does the DPD include the remedial actions that will be taken if the policies need adjustment?</li> </ul>	<ul style="list-style-type: none"> <li>Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.</li> <li>Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:               <ol style="list-style-type: none"> <li>the effectiveness of policies and what evidence is being collected to undertake this</li> <li>changes affecting the baseline information and any information on trends on which the DPD is based</li> </ol> </li> <li>Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> <li>Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision</li> <li>Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required.</li> </ul>	
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> <li>Is there sufficient evidence to demonstrate</li> </ul>	<ul style="list-style-type: none"> <li>A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box'</li> </ul>	

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>that the Duty to Co-operate has been undertaken appropriately for the plan being examined?</p> <ul style="list-style-type: none"> <li>Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?</li> </ul>	<p>approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why.</p> <ul style="list-style-type: none"> <li>The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.</li> </ul>	
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> <li>Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)?</li> <li>Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report?</li> <li>Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?</li> </ul>	<ul style="list-style-type: none"> <li>Sections of the DPD setting out indicators, targets and milestones</li> <li>Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</li> <li>Reference to any other reports or technical documents which contain information on the delivery of policies</li> <li>Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal</li> </ul>	
<p><b><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></b></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> <li>• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification?</li> <li>• Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons.</li> <li>• Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy.</li> <li>• Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement.</li> <li>• Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement</li> <li>• Reports or copies of correspondence as to how representations have been considered and dealt with.</li> </ul>	



# Soundness Self-Assessment Checklist (March 2014)

## Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (LPAs) make their own assessment of need for the purposes of planning
- That LPAs work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

## Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
<b>Policy A: Using evidence to plan positively and manage development (para 6)</b>		
Early and effective community engagement with both settled and traveller communities.	<ul style="list-style-type: none"> <li>• Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.</li> </ul>	
Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.	<ul style="list-style-type: none"> <li>• Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan.</li> <li>• Collaborative working with neighbouring local planning authorities.</li> <li>• A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.</li> </ul>	
<b>Policy B: Planning for traveller sites (paras 7-11)</b>		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p>	<ul style="list-style-type: none"> <li>• Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15.</li> <li>• An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified.</li> </ul>	

## Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
Ensure that traveller sites are sustainable economically, socially and environmentally.	<ul style="list-style-type: none"> <li>Policy which takes into account criteria a-h of para 11</li> </ul>	
<b>Policy C: Sites in rural areas and the countryside (para 12)</b>		
When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.		
<b>Policy D: Rural exception sites (para 13)</b>		
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.	<ul style="list-style-type: none"> <li>If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.</li> </ul>	
<b>Policy E: Traveller sites in Green Belt (paras 14-15)</b>		
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through</p>	<ul style="list-style-type: none"> <li>Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.</li> </ul>	

## Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
the plan-making process.		
<b>Policy F: Mixed planning use traveller sites (paras 16-18)</b>		
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	<ul style="list-style-type: none"> <li>• Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another.</li> <li>• N.B. Mixed use should not be permitted on rural exception sites</li> </ul>	
<b>Policy G: Major development projects (para 19)</b>		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	<ul style="list-style-type: none"> <li>• Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community.</li> </ul>	

# Soundness Self-Assessment Checklist (March 2014)

## Soundness Self-Assessment Checklist

### Integration of marine and terrestrial planning

As the UK marine area and marine plan area boundaries extend up to the level of mean high water spring tides while terrestrial planning boundaries generally extend to mean low water spring tides (including estuaries), the marine plan area will physically overlap with that of some terrestrial plan. Local authorities with any tidal frontage, even if far inland and not conventionally regarded as coastal, must therefore take full account of the MMO, the MPS and marine plans under S.58 of the Marine and Coastal Access Act and the Duty to Co-operate in Section 110 of the Localism Act 2011. A full list of the local planning authorities whose areas overlap with the UK marine area appears in Appendix One.

Furthermore, the Duty to Co-Operate requires all local planning authorities, even if landlocked, to take account, where relevant, of the MMO's plans and activities when preparing their Local Plans. Finally, the NPPF requires LPAs to take the MPS into account under the tests of soundness (specifically, to test if an emerging DPD is consistent with national policy, which includes the MPS).

The Marine and Coastal Access Act 2009 (the Act) provided for the introduction of a marine planning system for England's inshore and offshore marine area, establishing the Secretary of State as the Marine Planning Authority for these areas. The Act also provided for the establishment of the Marine Management Organisation (MMO) and for the Secretary of State to delegate various planning functions. The planning functions including preparation and review were delegated to the MMO in 2010. The Act also provided for the adoption of the UK Marine Policy Statement (MPS). The MPS was adopted on 18 March 2011 and provides the policy framework for marine planning and for all decisions likely to affect the marine area.

There are eleven plan areas in English waters, for each of which a Marine Plan will be prepared by the MMO and adopted by the Secretary of State for the Environment, Food and Rural Affairs.

In practical terms, all activities undertaken in the marine area require land based infrastructure, without which our ability to benefit economically and socially from activities in the marine area would be extremely limited.

The UK Government's vision for the marine environment, as articulated in the MPS, is:

'clean, healthy, safe, productive and biologically diverse oceans and seas'.

## Soundness Self-Assessment Checklist (March 2014)

In the absence of a marine plan prepared by the MMO and adopted by the Secretary of State the MPS is the relevant marine policy document. Where a marine plan has been adopted both the MPS and the Marine Plan are relevant marine policy documents for the marine plan area.

As articulated in the Marine and Coastal Act and the MPS, the Government aims for the MPS and marine planning systems to sit alongside and interact with existing planning regimes across the UK. Specifically, s.58 of the Marine and Coastal Access Act requires all<sup>1</sup> public bodies to:

- take authorisation or enforcement decisions that affect or might affect the UK marine area in accordance with the MPS and relevant Marine Plans, unless relevant considerations indicate otherwise
- state their reasons where authorisation or enforcement decisions are not taken in accordance with the MPS and relevant Marine Plans
- have regard to the MPS and relevant Marine Plans when taking decisions that affect or might affect the UK marine area which are not authorisation or enforcement decisions<sup>2</sup>

In addition, the MPS seeks integration of marine planning and the terrestrial planning system through:

- Consistency between marine and terrestrial policy documents and guidance
- Liaison between respective responsible authorities for terrestrial and marine planning, including in plan development, implementation and review stages
- Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions

These aims are further supported by footnote 36 in the NPPF.

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<sup>1</sup> Like the Duty to Co-Operate, no distinction is made by the Marine and Coastal Access Act between public authorities with a tidal frontage and those without. Emphasis is placed on the likelihood of the decision being made affecting the marine area.

<sup>2</sup> For example, decisions about what representations they should make as a consultee or about what action they should carry out themselves.

## Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
<b>Key requirements under the Duty to Co-Operate</b>		
Consistency between marine and terrestrial policy documents and guidance	<ul style="list-style-type: none"> <li>• Demonstration of consistency of aim between relevant local plan policies and marine policy documents (i.e. the MPS and any relevant adopted marine plans)</li> <li>• Proof of collaborative working with the MMO and that the MPS has been taken into account.</li> </ul>	
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	<ul style="list-style-type: none"> <li>• Early and effective policy development engagement undertaken, including discussions with the MMO</li> <li>• Evidence of iteration of policies and plans as a result of engagement with the MMO</li> <li>• Evidence of engagement with the MMO in relation to monitoring, implementation and throughout the policy cycle</li> <li>• Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS</li> </ul>	
Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions	<ul style="list-style-type: none"> <li>• Evidence that the LPA has shared or provided relevant data to the MMO that can help inform Marine Plans or MPS review</li> <li>• Demonstration that local plan policy has been underpinned by data provided by the MMO or the MPS</li> <li>• Explicit cross-referencing in local plan to MPS, the MMO, their</li> </ul>	



## Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
	roles, and relevant marine plans	
<b>Marine Policy Statement- Chapter 2: General Principles for Decision-Making<sup>3</sup></b>		
<b>Sections 2.1 -2.2: The UK vision for the marine environment</b>		
<p>The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas')</p> <p>Achieving the vision through marine planning</p>	<ul style="list-style-type: none"> <li>• Reference in DPD where appropriate to UK vision for the marine environment</li> <li>• Contribution to the vision through local plan policies and supporting text</li> </ul>	
<b>Section 2.4: Considering benefits and adverse effects in marine planning</b>		
Consider benefits and adverse effects of plan policies	<ul style="list-style-type: none"> <li>• Consideration of benefits and adverse effects of policy on the marine area as appropriate within the DPD's sustainability appraisal</li> </ul>	
<b>Section 2.5: Economic, social and environmental considerations</b>	<ul style="list-style-type: none"> <li>•</li> </ul>	
Contribute to the objectives of relevant	<ul style="list-style-type: none"> <li>• Reference to relevant EU Directives in DPD and sustainability</li> </ul>	

<sup>3</sup> As the Marine Policy Statement was not targeted specifically at terrestrial planning authorities, some of its sections are, in practice, relevant to marine planning authorities only and/or there is already a comprehensive policy framework governing terrestrial development (e.g. energy infrastructure), Where this is considered to be the case, i.e. where it is considered likely that a terrestrial planning DPD would be found sound without referencing that section, the section in question has been omitted from this checklist.

## Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
EU Directives (Marine Strategy Framework Directive and Water Framework Directive)	appraisal <ul style="list-style-type: none"> <li>Consideration of contribution of DPD policies to the objectives of relevant EU Directives</li> </ul>	
<b>Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities</b>		
<b>3.1 Marine Protected Areas</b>		
Incorporate identified areas and features of importance for nature conservation  Activities or developments that may result in adverse impacts on biodiversity should be designed or located to avoid such impacts	<ul style="list-style-type: none"> <li>Identification of relevant areas and features of importance for nature conservation within relevant marine plan area(s)</li> <li>Consideration of impacts of policy and/or terrestrial development on those areas and features of importance</li> <li>Measures to mitigate, monitor and manage negative impacts on those areas and features of importance</li> </ul>	
<b>3.4 Ports and shipping</b>		
Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety  Protect the efficiency and resilience of continuing port operations	<ul style="list-style-type: none"> <li>Evidence that policy with potential impact on ports and shipping minimises negative impacts on sector</li> <li>Where relevant, evidence that economic, employment and transport policies are protective of ports and shipping sector</li> </ul>	
<b>3.8 Fisheries</b>		
Consider potential economic, social	<ul style="list-style-type: none"> <li>Where relevant, evidence that other policies minimise negative</li> </ul>	

## Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
and environmental impacts of other developments on fishing activity	impacts on fishing activity and/or aquaculture	
<b>3.9 Aquaculture</b>		
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	<ul style="list-style-type: none"> <li>Where relevant, evidence that the benefits of aquaculture industry development have been considered</li> </ul>	
<b>3.10 Surface water management and waste water treatment and disposal</b>		
Maximise opportunities for co-existence of waste water infrastructure with other activities in the marine environment	<ul style="list-style-type: none"> <li>Reference to and consideration of the co-existence of waste water infrastructure with other marine activities, including the potential for waste water infrastructure to mitigate marine impacts through design or location</li> </ul>	
<b>3.11 Tourism and recreation</b>		
Consider the potential for tourism and recreation in the marine environment and the benefits this will bring to the economy and local communities	<ul style="list-style-type: none"> <li>Where relevant, reference to marine tourism and recreation</li> <li>Evidence that the potential for marine tourism and recreation has been recognised in plan-making</li> </ul>	

# Soundness Self-Assessment Checklist (March 2014)

## Appendix One

This is an alphabetical list of all local planning authorities in England whose area overlaps with the UK marine area.

Adur	City of Westminster	Havant	North Tyneside
Allerdale	Colchester	Havering	North York Moors National
Arun	Copeland	Horsham	Park
Babergh	Cornwall	Hounslow	Northumberland
Barking and Dagenham	County Durham	Huntingdonshire	Norwich
Barrow-in-Furness	Dartford	Ipswich	Poole
Basildon	Doncaster	Isle of Wight	Preston
Bassetlaw	Dover	Isles of Scilly	Purbeck
Bexley	East Cambridgeshire	Kensington and Chelsea	Redcar and Cleveland
Blackpool	East Devon	King's Lynn and West Norfolk	Richmond upon Thames
Boston	East Lindsey	Lake District National Park	Rochford
Bournemouth	East Riding of Yorkshire	Lambeth	Rother
Broadland	Eastbourne	Lancaster	Scarborough
Broads Authority	Eastleigh	Lewes	Sedgemoor
Canterbury	Exeter	Lewisham	Sefton
Carlisle	Exmoor National Park	Liverpool	Selby
Castle Point	Fareham	Maidstone	Shepway
Chelmsford	Fenland	Maldon	South Cambridgeshire
Cheshire West and Chester	Fylde	Medway	South Downs National Park
Chichester	Gateshead	Middlesbrough	South Gloucestershire
Chorley	Gloucester	New Forest	South Hams
Christchurch	Gosport	New Forest National Park	South Holland
City of London	Gravesham	Newark and Sherwood	South Lakeland
City of Brighton and Hove	Great Yarmouth	Newcastle upon Tyne	South Norfolk
City of Bristol	Greenwich	Newham	South Ribble
City of Kingston upon Hull	Halton	North Devon	South Somerset
City of Peterborough	Hambleton	North East Lincolnshire	South Tyneside
City of Plymouth	Hammersmith and Fulham	North Lincolnshire	Southend-on-Sea
City of Portsmouth	Hartlepool	North Norfolk	Southwark
City of Southampton	Hastings	North Somerset	Stockton-on-Tees

## Soundness Self-Assessment Checklist (March 2014)

Stroud  
Suffolk Coastal  
Sunderland  
Swale  
Taunton Deane  
Teignbridge  
Tendring  
Test Valley  
Thanet  
Thurrock  
Tonbridge and Malling  
Torbay  
Torridge  
Tower Hamlets  
Wandsworth  
Warrington  
Waveney  
Wealden  
West Devon  
West Dorset  
West Lancashire  
West Lindsey  
West Somerset  
Weymouth and Portland  
Winchester  
Wirral  
Worthing  
Wyre  
York

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## Appeal Decision

Site visit made on 18 October 2016

**by I Jenkins BSc CEng MICE MCIWEM**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Decision date: 10 January 2017**

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**Appeal Ref: APP/L5810/W/16/3152828**

**59 Ham Street, Ham, Richmond upon Thames, TW10 7HR**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
  - The appeal is made by Gilbert Homes against the decision of the Council of the London Borough of Richmond-upon-Thames.
  - The application Ref 15/4780/FUL, dated 13 November 2015, was refused by notice dated 6 April 2016.
  - The development proposed is demolition of the existing bungalow (C3) and the erection of 4 x three bed family dwellings and off-street parking.
- 

### Decision

1. The appeal is dismissed.

### Procedural matters

2. The original development for which planning permission was sought in this case was described on the planning application form as '*demolition of the existing bungalow (C3) and the erection of 4 x three bed family dwellings with basement accommodation and off-street parking.*' I will refer to it as option 1. While the application was with the Council for consideration, the appellant put forward an alternative option, option 2, which did not include a basement level and the associated lightwells, and included a revised parking/landscaping layout at the front of the proposed properties. Whilst revised floor plans/elevations were not provided at the time, option 2 was nevertheless taken into account by the Council, along with option 1.
3. On the 3 May 2016 the Council confirmed that it did not object to option 2 being taken into account in the determination of the appeal, supported by drawings submitted after its determination of the application, on 20 and 21 April 2016<sup>1</sup>. In its Grounds of Appeal, dated 20 June 2016, the appellant confirmed that the appeal should be determined on the basis of option 2, without the originally proposed basements, and the following revised description of development: '*demolition of the existing bungalow (C3) and the erection of 4 x three bed family dwellings and off-street parking*'. I have determined the appeal on that basis, as I consider to do so would be unlikely to prejudice the interests of anyone, and I have reflected the revised description in the summary information above.

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<sup>1</sup> Including drawing no. 15-P1201-01C.

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## Main Issues

4. I consider that the main issues in this case are the effect of the proposal on the character and appearance of the locality, including the Ham House Conservation Area no. 23, and whether the scheme would make adequate provision for Affordable Housing.

## Reasons

### *Character and appearance*

5. The appeal site fronts onto the southwestern side of Ham Street. Back Lane, which runs along the rear boundary of the site, forms the southwestern boundary of the Ham House Conservation Area no. 23 hereabouts. In keeping with the descriptions set out in the *Ham House Conservation Area no. 23* description and the *Character Appraisal & Management Plan Conservation Areas-Petersham no. 6, Ham Common no. 7, Ham House no. 23 & Parkleys Estate no. 67* (CAA), this section of Ham Street contains an eclectic collection of buildings. On the northeastern side of the street, these include detached and semi-detached dwellings and on a smaller scale terraced cottages and single-storey almshouses, to the rear of which are the grounds of Grey Court School. No. 59, which comprises a flat roofed bungalow with integral garage, shares its northwestern boundary with Ham Library, which is a single-storey pitch roofed building, and its southeastern boundary with No. 57, a 'Huf' style house which is under construction.
6. The CAA indicates that the gaps between the houses and groups of houses provide glimpses of the wider backdrop of trees and green space, a landscape setting which contributes to the distinctive semi-rural character of the area. The row of properties that includes No. 59, Ham Library to the north and No. 57 to the south, which have spacious landscaped plots, makes a particularly significant contribution in this regard. Ham Library is set in relatively open landscaped grounds, with a low boundary wall. No. 59 is set back from the front and rear boundaries of the site and alongside its northwestern boundary, shared with the grounds of the library. Due to its single-storey scale, planting within its grounds and the mix of tall walls and fencing along its boundaries, the visual impact of this bungalow is small, such that it makes a neutral contribution to the character and appearance of the Conservation Area. When seen from Ham Street and Back Lane the site has the appearance of enclosed green space. Although No. 57 is a relatively large 2-storey property, the site retains a sense of spaciousness, as a result of the design and layout of the dwelling. This is due in part to: the lightweight appearance of the building, the publicly visible first floor facades of which comprise for the most part glazing; and, the limited visual impact of the single-storey element of the property on its northern side and the gap between the building and its southern boundary.
7. The proposal involves the demolition of the existing dwelling and the erection of 2 pairs of semi-detached houses with a new, more centrally positioned, vehicular entrance off Ham Street and the replacement of the front fence with a lower front wall.
8. Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)* requires special attention be paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area.



The Framework indicates that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration of a heritage asset.

9. The traditional brick built, pitch roofed form of the proposed buildings would reflect the design of a number of the existing properties along Ham Street. Furthermore, they would have attractively detailed front elevations including a bay window, arched doorway and pitch roofed dormers. In addition, although the proposal would result in the loss of a number of trees from the site, I have no reason to dispute the appellant's view that in most cases they are in relatively poor condition and/or of limited value in terms of visual amenity.
10. However, whilst the first floor level accommodation of the proposed dwellings would be partially contained within roof space, their ridge level would extend above the 2-storey roof level of No. 57 and well above the ridge level of the library. Unlike the existing appeal property, they would be obtrusive features of the street, clearly visible from public vantage points to the front and rear. Furthermore, the proposed row of buildings would extend across almost the entire length of the site between its northwestern and southeastern boundaries, with a small gap at either end. The row of development would be interrupted only by a narrow gap between the semi-detached blocks, which would not be sufficient to limit their massing to any significant degree. Furthermore, the potential to soften the visual impact of the development through landscaping would be small, not least as much of the frontage of the site would be taken up by hardstanding for parking. The proposed built development would dominate the site to the extent that it would no longer make any material contribution to the spacious, verdant character of this part of the Conservation Area.
11. I conclude that the proposal would cause significant harm to the character and appearance of the locality, contrary to the aims of Policy CP7 of the *London Borough of Richmond upon Thames Core Strategy, April 2009* (CS), the Policies DM HO1, DM HO2, DM DC1 of the *Development Management Plan, November 2011* (DMP), *Supplementary Planning Document-Design Quality, 2006* and *Supplementary Planning Document-Small and Medium Housing Sites, 2006*. As the impact of the proposal would be unlikely to affect a wider area, I consider that the resultant harm to the significance of the Conservation Area, although significant and contrary to the aims of DMP Policy DM HD1 and Policy 7.8 of the *London Plan* (March 2016), would be less than substantial. The Framework indicates that where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, such as a Conservation Area, that harm should be weighed against the public benefits of the proposal. Insofar as the above Development Plan Policies and supporting documents seek to ensure that development responds to local character and history, and addresses the integration of new development into the natural, built and historic environment, they are consistent with the aims of the Framework.

#### *Affordable Housing*

12. CS Policy CP15 indicates that some form of contribution towards Affordable Housing will be expected on all new housing sites, as set out in the Development DPD. DMP Policy DM HO 6 indicates that the Council will seek the

maximum reasonable amount of Affordable Housing when negotiating on individual private residential schemes, with reference to identified contribution levels and economic viability.

13. The findings of viability assessment reports submitted by the appellant and the Council during the earlier stages of the appeal were contradictory with regard to whether a financial contribution towards Affordable Housing would render the scheme unviable. However, in its final comments, dated 14 November 2016, the appellant indicated that, if the need for a contribution is supported by policy, a sum of £138,904 would not compromise the viability of the scheme; a view shared by the Council<sup>2</sup>. However, I give little weight to the appellant's stated willingness to provide a unilateral undertaking, pursuant to section 106 of the *Town and Country Planning Act 1990*, to secure such a contribution, as only a draft planning obligation<sup>3</sup> has been submitted and there is no guarantee that a formally completed version would be provided in the event that the appeal were to be allowed and planning permission granted. Under these circumstances the proposal would conflict with the aims of DMP Policy DM HO 6 and CS Policy CP15.
14. However, an order of the Court of Appeal, dated 13 May 2016, gave legal effect to the policy set out in the written Ministerial Statement of 28 November 2014 (WMS). It indicates that there are specific circumstances where contributions for Affordable Housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale development. The circumstances are that contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres. The appeal proposal would fit this criterion. The policy set out in the WMS has also now been incorporated into the national *Planning Practice Guidance* (PPG).
15. Since then, in June 2016, the Council resolved to continue to require Affordable Housing contributions from all sites, through the application of emerging Policy LP 36 of its *Pre-Publication Local Plan* (PPLP). The justification given by the Council for this approach is the substantial need for affordable housing in the area and the significant contribution made to housing supply in the borough by small sites. However, these are not exceptional circumstances supported by the WMS or PPG. The only identified exception to the 10-unit threshold relates to development in designated rural areas where the local planning authority has chosen to apply a lower threshold. There is no evidence before me to show that this exception applies to the appeal scheme.
16. I acknowledge that the application of the WMS policy would undermine the Council's current strategy of meeting Affordable Housing needs in its area through funding generated in part from the development of small sites. However, the associated provisions of the current Development Plan, DMP Policy DM HO 6 and CS Policy CP15, pre-date this change in national policy, a key aim of which is to provide a boost for small and medium sized developers by reducing the costs associated with small scale development. Furthermore, the PPLP, which carries forward the same approach as the Development Plan, is at a relatively early stage towards adoption. Under the circumstances, I consider that although the proposal would conflict with CS Policy CP15, DMP Policy DM HO 6 and emerging Policy LP 36, in light of the

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<sup>2</sup> As set out in an email from the appellant to the Council, dated 14 November 2016.

<sup>3</sup> Submitted by email, dated 22 November 2016.

guidance on the matter in the PPG, this would not be sufficient to justify withholding planning permission in this case.

17. I conclude that the lack of provision of a financial contribution towards Affordable Housing would not amount to an unacceptable level of provision in this particular case. A financial contribution is not necessary to make this particular development acceptable in planning terms.

*Other matters*

18. Whilst No. 59 appears to be in a relatively poor state of repair, I give this little weight, as to do otherwise would be likely to encourage landowners seeking a beneficial permission not to manage their property in a diligent manner.
19. The proposal, which in housing density terms would make more efficient use of a part previously-developed site, would add to the supply of family sized housing in the area. Furthermore, the appellant has indicated that renewable energy technologies would be utilised, to limit carbon dioxide emissions associated with the scheme, and water saving devices would also be incorporated into the design. In these respects it would gain some support from the Framework. In addition, there is no dispute that, in keeping with the aims of DMP Policy DM DC 5, the proposal would not harm the living conditions of neighbouring residents.

*Conclusions*

20. I conclude on balance, having regard to the likely economic, social and environmental impacts of the scheme, any benefits of the proposal would be significantly and demonstrably outweighed by the harm that it would cause to the character and appearance of the locality, including the Ham House Conservation Area no. 23. It would not amount to sustainable development under the terms of the Framework and I consider that it can be regarded as being in conflict with the Development Plan taken as a whole. For the reasons given above, I conclude that the appeal should be dismissed.

*I Jenkins*

INSPECTOR

## Appendix One: Representations made to the Richmond Local Plan Pre-Publication Version August 2016

Kevin Scott Consultancy Limited - A company registered in England & Wales with number 07659727  
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Planning Policy  
London Borough of Richmond  
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TW1 3BZ

17 August 2016

Dear Sir or Madam

### **Richmond Local Plan Pre-Publication Version**

We represent the owner of Platts Eyot, Port Hampton Estates Limited. We wish to make the following comments on the Local Plan Public Pre-Publication document published for consultation in July 2016.

### **Policy LP18**

This policy, in respect of public access to the riverside states that:

*"B. All development proposals alongside or adjacent to the borough's river corridors should:*  
*a. Retain existing public access to the riverside and alongside the river; and*  
*b. Enhance existing public access to the riverside where improvements are feasible; or*  
*c. Provide new public access to the riverside and the foreshore where possible.*  
*There is an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside and foreshore."*

While we support the principle of this policy, it must be acknowledged that in some cases the use of the site or ownership issues would prevent this. This policy should make reference to this and we suggest that additional wording be added to B (c) as follows:

*"c. Provide new public access to the riverside and the foreshore where possible.*  
*There is an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside and foreshore unless site specific characteristics would prevent this."*

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In respect of Riverside uses this policy states that:

*“D. The Council will resist the loss of existing river-dependent and river-related uses that contribute to the special character of the River Thames, including river-related industry (B2) and locally important wharves, boat building sheds and boatyards and other riverside facilities such as slipways, docks, jetties, piers and stairs.*

*This will be achieved by:*

- 1. resisting redevelopment of existing river-dependent or river-related industrial and business uses to non-river related employment uses or residential uses;*
- 2. ensuring development on sites along the river is functionally related to the river and includes river-dependent or river-related uses where possible, including gardens which are designed to embrace and enhance the river, and be sensitive to its ecology;*
- 3. requiring an assessment of the effect of the proposed development on the operation of existing river-dependent uses or riverside gardens on the site and their associated facilities on and off-site; or requiring an assessment of the potential of the site for river-dependent uses and facilities if there are none existing;*
- 4. ensuring that any proposed residential uses, where appropriate, along the river are compatible with the operation of the established river-related and river-dependent uses;*
- 5. requiring setting back development from river banks and existing flood defences along the River Thames.”*

The wording of the policy needs to reflect that the retention of such uses may no longer be viable or appropriate in certain locations. In some instances the introduction of new complementary uses is sometimes appropriate. For this reason we suggest a rewording of the policy as follows:

*“1. resisting redevelopment of existing river-dependent or river-related industrial and business uses to non-river related employment uses or residential uses unless the applicant can make a case that the retention of such uses is unviable”;*

## **Policy LP 19**

This policy, in respect of mooring and floating structures states that:

*“B. A mooring or other floating structure will be supported if it complies with the following criteria:*

- 1. it does not harm the character, openness and views of the river, by virtue of its design and height;*
- 2. the proposed use is river-dependent or river-related;*
- 3. there is no interference with the recreational use of the river, riverside and navigation; and*
- 4. the proposal is of wider benefit to the community.”*

The purpose or meaning of "wider benefit to the community" in this policy is meaningless and difficult to quantify in respect of the submission of any planning application. The previous three criteria in this draft policy provides sufficient control over the provision of such structures in the river. For these reasons we request that criteria 4 is deleted from the policy.

#### **Policy LP 40**

We support the wording of this policy which encourages a diverse and strong local economy. In particular criteria 3 and 4 which encourage flexible and mixed use employment developments.

#### **Policy SA 2**

This policy relates to the specific allocation of Platts Eyot for:

*"Regeneration of the island by maintaining, and where possible enhancing, existing river-dependent and river-related uses. New business and industrial uses (B1, B2 and B8) that respect and contribute to the island's special and unique character are encouraged. Residential development to enable the restoration of the Listed Buildings, especially those on the Heritage at Risk Register, may be appropriate."*

The supporting text also supports:

- Retention of the unique employment and business uses
- Improvement and enhancement of listed buildings and the conservation area
- Enabling residential development
- Safe access and egress to and from the site during times of flooding
- Preparation of a masterplan

Overall, we support the wording of this policy. However, new vehicular access is required to the island to support growth in uses on the site. The policy should, therefore include reference to the need for vehicular access to the island as part of any development proposals.

We trust these representations are accepted as a formal comment to this current local plan consultation process. Should you require any further clarification do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Scott', with a horizontal line underneath.

Kevin Scott BA (Hons) Dip TP MRTPI

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Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ

9 February 2017

**Our Ref:** PP Richmond Representations

Dear Sir / Madam,

**RE: Representation to Publication Consultation on the Local Plan (4<sup>th</sup> January to 15<sup>th</sup> February 2017)**  
**On Behalf of Power Leisure Bookmakers Ltd**

### **Introduction**

We write on behalf of our client, Power Leisure Bookmakers Ltd, to make representations to the Publication consultation on the Local Plan which is currently running until the 15<sup>th</sup> February.

We wrote in August 2016 to comment on the Pre-Publication version of the plan (our original letter is attached at **Appendix 1**). We have read the Council's response to our comments, and reviewed amendments made. However, on review of the Publication document, our client is disappointed that their previous comments made were taken into consideration by the Council, and although we do not intend to repeat our representations in full, we have provided a summary of our comments and new comments where necessary.

To re-iterate, our client's comments concern the provisions of Policies LP26 'Retail Frontages' and LP27 'Local Shops, Services and Public Houses'. In Summary, our client considers that the policies noted above are generally well-worded, however, there are elements of the Plan which require amendments and / or explanation before the Plan can be considered 'Sound'. Summary comments can be found below. As noted, our comments can be found in full at **Appendix 1**.

### **Comments**

**Policy LP26 Section A** – Firstly, it should be noted that in some instances, a change of use from A1 uses to other uses in Key Shopping Frontages should be acceptable. There is no evidence to suggest that any appropriate town centre use should be excluded from key frontages. There is a real danger that adopting such an approach will effectively put a moratorium on such new uses in centres and potentially encourage new operators and uses out of centres. Clearly such an approach is inappropriate and would fly in the face of the town centres first policy as set out in the NPPF which seeks to encourage town centre shops and services to locate within centres, rather than out of centre.

**Directors**  
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David Williams



In addition, there is still disparity between the policy and the supporting text (paragraph 7.2.5). The supporting text provides clarity on non-A1 uses, but our client considers that the policy wording should be more explicit in noting that a proposal for the change of use from an existing non-A1 use to another appropriate use will be generally acceptable.

**Policy LP26 Section B** – Although we welcome part (c) of the policy, we still consider that part (b) should specifically mention Sui Generis uses. The supporting text in 7.2.7 should be translated into policy.

**Policy LP26 Section C** – It is clear that the Council is seeking to resist an over-concentration of uses (especially betting shops) within any one area. In the Council's response to our client's comments, it is noted that the list including 'betting offices is not exhaustive' and the 'inclusion of this use is merely an example'. However, the Council specifically state that they are seeking to resist betting shops and importantly, there is no background information produced by the Council to suggest there is an over-concentration in the first place (in fact, quite the opposite).

We have reviewed the evidence base produced by the Council and there is no reference to an evident overconcentration of betting shops within the borough. For example, it is noted within the Council's Town Centre Health Check (2013) that Barnes is actually under-represented in terms of betting shop provision (well under the UK average). Although there are 3 betting shops in Whitton, this cannot be judged as an 'over-representation'. The London Borough of Southwark contains over 75 betting shops (which is a small number compared to many other London Boroughs). For this reason, it is considered that the reference to 'betting shop use' should be specifically removed from the policy. Importantly, it should be noted that a betting shop use is a typical town centre use which has a number of positive (not just negative) impacts on a centre and there is no firm evidence to suggest that this use could cause harm to a centre.

At present, the Policy is Unsound as it is not 'Consistent with National Policy' or 'Justified' as it is not presenting the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence. We suggest that this part of the policy is re-worded, and the reference to 'Betting Shops' is removed.

**Policy LP26 Section F** – In their response to our client's comments, the Council note that marketing is required where a change of use is not supported by policy. However, it is clear that betting shop uses are not supported by policy (as noted above) and therefore two years marketing will be required for new betting shops applications. Indeed, Section C explicitly notes this and Sections A and B cannot be relied upon as they do not align with the supporting text.

In our client's opinion, Section F places an additional and unnecessary burden on betting shop operators (on top of the fact that betting shops now always require applications as they fall within the Sui Generis use category). This is against the aspirations of the London Plan and is not 'Consistent with National Policy'.

We have no issue with the fact that the Council will want to scrutinise new betting shop applications however, to assert unnecessary vetoes on areas where Betting Shop operators can locate, or to assert specific marketing requirements as a starting point for all new applications (when there is no robust evidence to support the approach) is wholly unsubstantiated and does not allow officers/members to make objective decisions. It also places unnecessary burdens on betting shops operators who already need to submit an application when looking for new units.

We are concerned that the document will conflict with paragraph 23 of the NPPF which states that policies should be positive and promote competitive town centres. Bullet point 4 of this paragraph states that LPAs should “*promote competitive town centres that provide customer choice and a diverse retail offer and which reflect individuality of town centres*”. This is a sentiment echoed in the London Plan (Policy 4.8). Clearly the document is likely to have a serious impact on particular industries and healthy competition between different operators by preventing new operators from locating within a particular centre. Again, regard needs to be had to the very real impact that the document is likely to have on a number of different industries and the clear conflict that would arise with the NPPF and the London Plan.

**Policy LP27 Section A Part (a)** – This part of the policy restricts Sui Generis uses such as betting shops from local centres if they are not within 400 metres of key / secondary frontage. However, this policy is essentially restricting Sui Generis uses such as betting shops locating in areas where there is no key frontage or secondary frontage within 400 metres, which could effectively mean that betting shop operators cannot locate within many parts of the borough (particularly in the local centres, parades and AMUs such as Barnes, Kew, Mortlake, Whitton and Heathfield, Richmond and Richmond Hill, East Twickenham and St Margarets). This effectively means that betting shop operators are restricted from locating in many areas of the borough which again is against the spirit and aspirations of the NPPF.

In order for the document to be ‘Sound’, we suggest that Richmond consider the points raised within this letter and take our clients comments into consideration in the preparation of the Plan, and request that you keep us informed on further progress and consultations.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'S Arnold', with a long horizontal flourish extending to the right.

**Sally Arnold (MRTPI)**

**Associate**

**PLANNING POTENTIAL**

**London**

## APPENDIX 1 – Letter submitted in August 2016 to Pre-Publication Consultation

Planning Policy  
London Borough of Richmond upon Thames  
Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ

19<sup>th</sup> August 2016

**Our Ref:** PP Richmond Representations

Dear Sir / Madam,

**RE: Representation to Pre-Publication Consultation on the Local Plan (8<sup>th</sup> July – 19<sup>th</sup> August 2016)**  
**On Behalf of Power Leisure Bookmakers Ltd**

### **Introduction**

We write on behalf of our client, Power Leisure Bookmakers Ltd, to make representations to the pre-publication consultation on the Local Plan which is currently running until the 19<sup>th</sup> August.

Section 19 of the Planning and Compulsory Purchase Act 2004 requires that development plan documents or any other local development document must have regard to national policy documents and guidance as in the NPPF.

Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) regulations prescribes that that local plans must contain a reasoned justification of the policies. As set out in the NPPG (Paragraph 014. Reference ID: 12-014-20140306) *“appropriate and proportionate evidence is essential for producing a sound Local Plan”* and *“evidence should be focused tightly on supporting and justifying the particular policies in the Local Plan”*. Paragraph 182 of the NPPF states that a local planning authority should submit a plan for examination which it considers is sound – namely that it is: positively prepared; justified; effective; and consistent with national policy.

The Council will also be aware that as a regulator they must comply with the Regulators' Code (April 2014), laid down in parliament in accordance with section 23 of the Legislative and Regulatory Reform Act 2006. The Code seeks to promote proportionate, consistent and targeted regulatory activity through the development of transparent and effective dialogue and understanding between regulators and those they regulate to reduce regulatory burdens on businesses.

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Our client's comments concern the provisions of Policies LP26 'Retail Frontages' and LP27 'Local Shops, Services and Public Houses'. In Summary, our client considers that the policies noted above are generally well-worded, however, there are elements of the Plan which require amendments and / or explanation before the Plan can be considered 'Sound'. Specific comments can be found below.

## **Comments**

### **Policy LP26 – Retail Frontages**

We note that **Section A** of Policy LP26 is very similar to the existing wording of existing policy DMTC3. The policy states that proposals that involve a loss of A1 retail in key shopping frontages will be resisted. It is also noted that other uses converting to retail will be supported subject to there being no adverse impact on the centre. However, the policy seems to exclude 'other town centre uses' or 'non-A1 uses' from locating within the key shopping frontages, and it is not clear from the evidence base why this is the case as the 2013 Town Centre Healthcheck states that the borough contains healthy town centres.

Supporting text 7.2.5 does not align with the policy and states that *'a proposal for a change of use from an existing non-A1 use to another appropriate use will generally be acceptable, provided that the proposed use complies with Section B parts 1-3 and Section C of this policy'*. We provide comments on Section B parts 1 – 3 and Section C in further detail below, however, prior to turning to these sections, it is important to state that our client considers that the sentiments made within the supporting text should be translated within the policy wording itself. If non-A1 uses are appropriate within key frontages, it should be noted within the policy wording. This should be reviewed and clarified.

**Section B** of the policy relates to secondary frontages. The policy notes that non-A1 proposals will be acceptable in secondary shopping frontages subject to the use meeting the criteria set out within the policy (parts 1 – 4). Part 1 of the policy states that non-A1 uses will be acceptable if (a) they meet community needs (specific uses are referenced) and (b) they fall within use classes A2 – A5. Supporting text paragraph 7.2.7 states that *'the list of uses suitable in secondary shopping frontages included in the policy is not exhaustive and other suitable uses may include B1 and Sui Generis uses, provided they meet the other criteria set out in this policy'*. Again, there is a disparity between the policy itself and the supporting text. It is unclear why B1 and Sui Generis uses are excluded from the policy itself, yet are clearly seen as appropriate uses within secondary frontages as stated within the supporting text. This also needs to be clarified.

The wording of the policy in both sections A and B should be updated reflecting our client's comments, otherwise, there is a clear discrepancy between the policy itself and the supporting text. If non-A1 typical town centre uses are excluded from the policy, there is a danger that appropriate town centre uses such as betting shop uses will be discouraged from both the key shopping areas and secondary shopping areas within the borough, potentially encouraging new operators and uses out of these areas. Clearly such an approach is inappropriate and would fly in the face of the town centres first policy as set out in the NPPF which seeks to encourage town centre shops and services to locate within centres, rather than in out of centre locations.

**Section C** of the policy relates to the over-concentration of uses and impact on amenity. Within this section it is noted that the *'Council will resist proposals that result in an over-concentration of similar uses (such as betting shops, estate agents,*

*restaurants and take-aways) in any one area'. Although our client does not object to the way in which the policy is worded, it does object to the fact that betting shops are specially referenced.*

We have reviewed the evidence base produced by the Council and there is no reference to an evident overconcentration of betting shops within the borough. For example, it is noted within the Council's Town Centre Health Check (2013) that Barnes is actually under-represented in terms of betting shop provision (well under the UK average). Although there are 3 betting shops in Whitton, this cannot be judged as an 'over-representation'. The London Borough of Southwark contains over 75 betting shops (which is a small number compared to many other London Boroughs). For this reason, it is considered that the reference to 'betting shop use' should be specifically removed from the policy. Importantly, it should be noted that a betting shop use is a typical town centre use which has a number of positive (not just negative) impacts on a centre and there is no firm evidence to suggest that this use could cause harm to a centre.

**Section G** of the policy relates to 'Marketing requirements for change of use'. Within the policy, it is noted that where a proposal involves a change of use not supported by policy, the Council will require satisfactory evidence of full and proper marketing of the site for at least two years. It is noted within supporting text paragraph 7.2.15 that marketing evidence should be provided in line with Appendix 5 which sets out what marketing should entail for loss of retail (A1), pubs (A4) and Offices (B1). Although marketing policies are well established in London for loss of B1 uses in particular, our client considers that the Council's marketing requirements for two years are overly onerous and unnecessary. It is considered that this part of the policy should be reviewed.

Firstly, it is very unlikely that a property in Richmond would be vacant for two years as it is a popular location with London, and therefore being able to provide vacancy for two years continuously would be near on impossible. Secondly, it provides yet a further hurdle that betting shop operators would need to overcome in order to operate within a town centre location. Indeed, since the Use Class Order changed in April 2015, Betting Shop Uses are now considered under 'Sui Generis' use class and an application is now always required for Betting shop uses.

We have no issue with the fact that the Council will want to scrutinise new betting shop applications however, to assert unnecessary vetoes on areas where Betting Shop operators can locate, or to assert specific marketing requirements as a starting point for all new applications (when there is no robust evidence to support the approach) is wholly unsubstantiated and does not allow officers/members to make objective decisions. It also places unnecessary burdens on betting shops operators who already need to submit an application when looking for new units.

We are concerned that the document will conflict with paragraph 23 of the NPPF which states that policies should be positive and promote competitive town centres. Bullet point 4 of this paragraph states that LPAs should "*promote competitive town centres that provide customer choice and a diverse retail offer and which reflect individuality of town centres*". This is a sentiment echoed in the London Plan (Policy 4.8). Clearly the document is likely to have a serious impact on particular industries and healthy competition between different operators by preventing new operators from locating within a particular centre. Again, regard needs to be had to the very real impact that the document is likely to have on a number of different industries and the clear conflict that would arise with the NPPF and the London Plan.

## Policy LP27 – Local Shops, Services, and Public Houses

**Section A** Part (a) of Policy LP27 needs further clarification, as our client is unclear on the intention of the policy. The Council note that in order to protect local shops, change of use from a premises falling within A1 – A5 uses will not be permitted unless (a) the unit is within 400 metres of a designated shopping frontage. However, this policy is essentially restricting Sui Generis uses such as betting shops locating in areas where there is no key frontage or secondary frontage within 400 metres, which could effectively mean that betting shop operators cannot locate within many parts of the borough (particularly in the local centres, parades and AMUs such as Barnes, Kew, Mortlake, Whitton and Heathfield, Richmond and Richmond Hill, East Twickenham and St Margarets).

In summary our comments are as follows:

- Policy LP26 Section A – It is unclear whether non-A1 uses are actually considered appropriate within designated key frontages. There is no evidence to suggest that any appropriate town centre use should be excluded from key frontages. There is a disparity between the policy and the supporting text (paragraph 7.2.5);
- Policy LP26 Section B – It is clear that non-A1 uses are acceptable in secondary frontages, but it is unclear whether Sui Generis uses such as betting shops are included within the ‘non-A1’ use category. Again there is disparity between the policy and supporting text (paragraph 7.2.7);
- Policy LP26 Section C – It is clear that the Council are seeking to resist an over-concentration of uses (especially betting shops) within any one area. However, there is no background information produced by the Council to suggest there is an over-concentration in the first place (in fact, quite the opposite). Reference to betting shops should therefore be removed from the policy;
- Policy LP26 Section G – It is clear that betting shop uses are not supported by policy (as noted above) and therefore two years marketing will be required for new betting shops applications. This is an additional and unnecessary burden on betting shop operators (on top of the fact that betting shops now always require applications as they fall within the Sui Generis use category). This is against the aspirations of the London Plan and the NPPF;
- Policy LP27 Section A Part (a) – This part of the policy restricts Sui Generis uses such as betting shops from local centres if they are not within 400 metres of key / secondary frontage. This effectively means that betting shop operators are restricted from locating in many areas of the borough which again is against the spirit and aspirations of the NPPF.

We suggest that Richmond consider the points raised within this letter and take our clients comments into consideration in the preparation of the plan and request that you keep us informed on further progress and consultations.

Yours sincerely



**Sally Arnold (MRTPI) Senior Planner**

**PLANNING POTENTIAL**

**London**



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TEDDINGTON,  
LONDON BOROUGH OF  
RICHMOND-UPON-THAMES

CARE NEEDS ASSESSMENT

Prepared on behalf of  
Quantum Group

March 2016

**Teddington,  
London Borough of Richmond-Upon-Thames**

**Care Needs Assessment**

**Prepared on behalf of Quantum Group**

March 2016

<b>Project Reference:</b>	26031
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## 1. INTRODUCTION AND METHODOLOGY

- 1.1 The following report assesses the likely need for elderly accommodation and appropriate level of care within the proposed development at the Teddington Sports Ground, London Borough of Richmond-Upon-Thames (LBR). The Site is located in the north of the ward of Hampton Wick and is adjacent to the neighbouring ward of Teddington. For the purposes of this Assessment, Hampton Wick and Teddington Wards will form the local study area and will hereinafter, for simplicity, be referred to as Teddington (see **Appendix 1 – Site Location Plan**).
- 1.2 The report outlines the planning policy context at national, regional and local level; the demographic characteristics of the study area in comparison to LBR and the London region as a whole; a detailed description of existing levels of elderly accommodation and care within the Borough; and an assessment of the likely care needs of the Borough in the future.
- 1.3 To establish planning policy, current thinking and baseline conditions, the report has obtained information from the following sources:
- National Planning Policy Framework (NPPF);
  - London Plan, March 2015
  - LBR, Review of Core Strategy and Development Management Plan;
  - LBR, Core Strategy, April 2009;
  - LBR, Adopted Development Management Plan, 2011;
  - LBR, Housing for Older People, 2011
  - Office for National Statistics (ONS), 2011 Census;
  - ONS, 2012-based Sub-national population projections (SNPP);
  - Elderly Accommodation Council (EAC)/Housingcare.org; and
  - CLG, More Choice, Greater Voice *'Toolkit for producing a strategy for accommodation with care for older people'*, February 2008.
- 1.4 Section 2 of this Assessment will outline the national, regional and local planning policy relevant to the provision of elderly accommodation.



## 2. PLANNING POLICY FRAMEWORK

### *i) National Planning Policy Framework (NPPF)*

- 2.1 The NPPF, published in March 2012, follows three dimensions to achieve sustainable development: economic, social and environmental. Within its social role, the NPPF aims to support strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.
- 2.2 At paragraph 50, the NPPF advises that to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local authorities should:

**“plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community(such as ... older people ...)”**

- 2.3 The NPPF clarifies the definition of 'older people' as:

**“people over retirement age, including the active, newly-retired through to the very frail elderly, whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.”**

### *ii) London Plan (March 2015)*

- 2.4 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The document brings together the geographic and locational (although not site specific) aspects of the Mayor's other strategies, including those dealing with transport, economic development, housing, culture and a range of social issues.
- 2.5 Paragraph 1.15c of the London Plan notes that the composition of London households is likely to change, partly because of social trends affecting the formation of families and the elderly. There is also likely to be an increase in one person households, particularly among older people. Such trends mean that provision will need to be made for more homes, particularly meeting the accommodation needs of families and single person households including older people, both of which are likely to increase in number.



- 2.6 Table 3.1 of the Plan sets out a global average housing supply target for London for the 2015-2025 period, together with individual targets for each Borough. For Richmond a minimum ten year target of 3,150 dwellings is identified (i.e. 315 pa).
- 2.7 The strategic component of Policy 3.17 'Health and Social Care Facilities' highlights the importance the Plan attaches to maintaining and to improving these facilities, especially where is a specific need. Caring for the elderly population is and will increasingly become a particular need.

***'Strategic***

***A The Mayor will support the provision of high quality health and social care appropriate for a growing and changing population, particularly in areas of under provision or where there are particular needs.'***

- 2.8 Annex 5 of the Plan sets out annualised strategic benchmarks to inform local targets and performance indicators for specialist housing for older people for the ten year period 2015-2025. In the case of Richmond upon Thames, an annual benchmark of 105 private and 30 intermediate sales (equating to 135 per annum) are identified.

***iii) London Borough of Richmond – Review of Core Strategy & Development Management Plan***

- 2.9 The London Borough of Richmond are currently reviewing the policies in their Core Strategy and Development Management Plan. It is understood that site allocations will be taken forward alongside this review. The consultation on the scope and rationale for the review of the policies, including the site allocations, took place from 4 January until 1 February 2016.
- 2.10 The Council are in the process of analysing and considering all consultation responses to inform the drafting of the revised policy wording and the specific site allocations. There will be a formal consultation on the first draft Local Plan (referred to as the pre-publication version) in the late spring/early summer 2016, where it is understood that there will be a further opportunity to comment.
- 2.11 According to the London Borough of Richmond, the overall approach to housing delivery and the spatial strategy are in line with national and regional policy and guidance. However, the Council recognises that updates are likely to be needed in order to reflect the new London Plan housing target for the Borough, which was adopted by the Mayor of London as part of the London Plan in 2015. Additionally, there is a need to consider developing the approach to size, type, tenure and specific needs including for the Private Rented Sector, Gypsies and

Travellers, families and older people to accord with the NPPF and the recommendations of the Independent Inspector who considered the Further Amendments to the London Plan.

*iii) London Borough of Richmond – Core Strategy (April 2009)*

- 2.12 The Core Strategy sets out the Strategic Planning Framework for the Borough for the next 15 years up to 2024. The borough's housing is mainly in owner-occupation (68% according to the 2001 Census), with 15% rented privately, and 12% rented from a housing association. Affordability is a key issue, with house prices considerably higher than the London average. There is a very significant housing need in the borough.
  
- 2.13 The Core Strategy recognises the acute shortage of housing, particularly affordable housing for families, and the need to provide housing to meet local requirements, particularly for the increasing number of one person households, for older people and those with restricted mobility (paragraph 5.1.5). A key objective of the Core Strategy is ensuring that there is a suitable stock of good quality housing to meet the needs of all residents, particularly encouraging more affordable housing to meet the acute need in the Borough and housing for those with specific needs (paragraph 5.2.4).
  
- 2.14 The Core Strategy also notes that a key issue is the need to continue to adapt the historic environment and buildings to be suitable for people who are elderly or who have mobility problems. This applies to public space, where buildings are refurbished, and with new buildings including housing where the Council will seek both wheelchair and mobility standards.
  
- 2.15 The implementation of the Core Strategy will be largely dependent on investment by the private sector into new build or refurbishment of key land uses such as housing (including affordable housing subject to a level of grant support), employment and retail.
  
- 2.16 As an example, the Core Strategy notes that the Council is working with Richmond Housing Partnership to bring forward affordable and extra care housing and with the Primary Care Trust and Mental Health Trust to jointly review the condition of the health and social care estate. It is intended that rationalisation of premises will lead to capital returns which can be invested to provide fit for purpose premises and a more co-ordinated pattern of service, for public benefit.
  
- 2.17 In general, an appropriate mix of uses and higher densities of housing will be encouraged within the borough's five town centres as these are accessible by public transport, and occupiers of new development could benefit from a range of shops and services within easy

walking distance. It is recognised that the potential for higher densities is likely to be within the central areas of these towns rather than within adjoining residential areas.

2.18 Specifically, the Core Strategy (Policy CP14 Housing) states:

**‘The Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Development Framework policies. The Borough’s targets are:**

- **For the ten year period between 1 April 2007 and 31 March 2017, an additional 2,700 dwellings (Alterations to the London Plan, Dec 2006), annualised as 270 dwellings per year.**
- **In the ten years from March 2017, indicative capacity is expected to be in the range of 150-330 dwellings a year. An early alteration to the target contained in this strategy will be brought forward to reflect the updated London wide Housing Capacity Study /SHLAA.’**

2.19 The policy also identifies a net increase in residential units of 700-800 in Teddington and the Hamptons to the period up to 2017.

2.20 In terms of meeting people’s needs in the Borough, paragraph 5.1.5 notes that:

***‘The need to provide locally accessible community, training, educational, health, social, leisure and infrastructure facilities to match expected future needs, and particularly to provide for increasing school rolls, in an area where developable land is scarce. E.g. the high demand for primary places in Richmond/ East Sheen, St Margaret’s/ East Twickenham and Teddington and the need for primary health care facilities (especially doctor’s surgeries) in Kew, Richmond, Whitton and Ham’.*** (our emphasis)

2.21 Similarly, point 15 of paragraph 5.2.4 recognises the importance of:

***‘Ensuring that there are suitable schools, children’s centres, youth provision and services for older people within easy reach of local communities ...’***

2.22 Also the importance of providing a wide range of health facilities and housing to meet the needs of all residents, especially to enable independent living, and addressing specific needs for primary health care facilities is highlighted in point 16 of paragraph 5.2.4.

*iii) LB Richmond Adopted Development Management Plan - 2011*

- 2.23 The Development Management Plan (DMP) takes forward the Core Strategy's three inter-related themes of 'A Sustainable Future', 'Protecting Local Character' and 'Meeting People's Needs', with more detailed policies for the control of development.
- 2.25 Limited land supply within the Borough means that new developments must be directed at identified local needs. Policy DM HO 5 indicates that planning permission will be granted for new accommodation where housing is providing for an identified local need, across a range of tenures, providing they are on a site and in a location suitable for that particular use, and in accordance with other environmental, transport, parking and other relevant policies. Providing a need can be identified the range of housing to meet specific community needs can include sheltered housing with care support, residential care homes/nursing homes and extra-care housing.

*iv) Housing for Older People – London Borough of Richmond Upon Thames (2011)*

- 2.27 The London Borough of Richmond upon Thames has published a booklet entitled Housing for Older People (April 2011) which explores options that are available to older people to overcome problems associated with becoming elderly. These are broadly categorised as retirement housing and non-retirement housing for older people. The first of these is purpose built unfurnished housing for older people who, although self-sufficient and independent appreciate the security of being able to ask for help if needed. As an alternative, the document notes that sometimes properties become available which are designed exclusively for occupation by older people (non-retirement housing). These are self-contained flats and studios which are arranged in blocks where all tenants are over 55 years old.
- 2.28 Section 2 of this Assessment will outline the baseline demographics of the Teddington Study Area in comparison to the Borough and London Region overall.



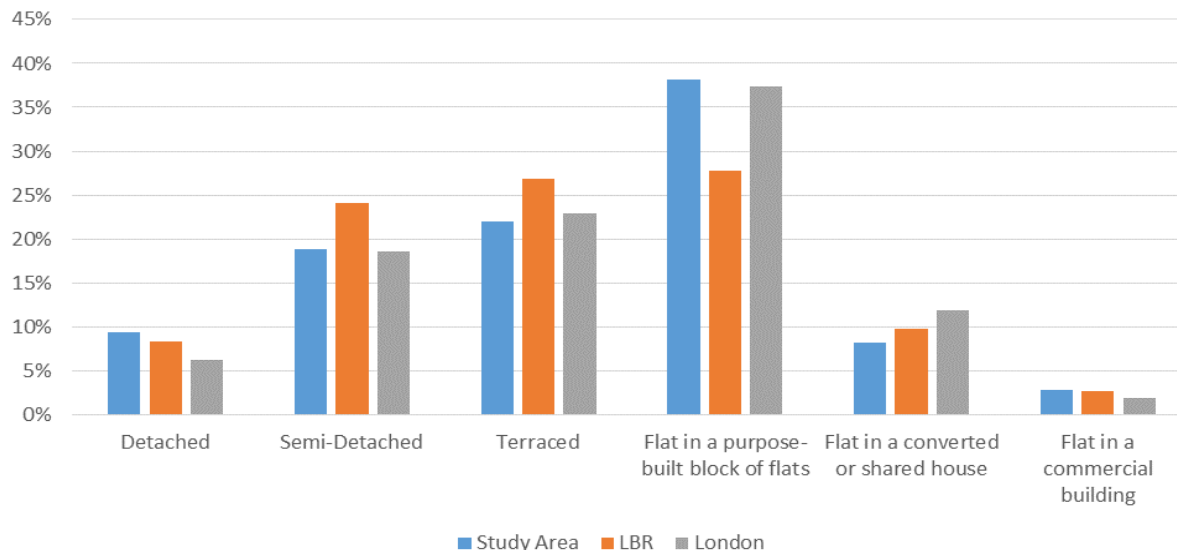
### 3. BASELINE DEMOGRAPHICS

- 3.1 In order to understand the context within which an Assessment of type and levels of care need exists, this section will identify the borough-wide baseline demographics in respect of housing and population, paying particular attention to the local demographic profile of the Teddington area.

#### *Housing Demographics*

- 3.2 At the time of the 2011 Census Teddington presented an atypical pattern of accommodation type with a notably higher percentage of purpose-built flats than was the norm for this particular London Borough (**Figure 1**). Whilst Teddington is similar to the accommodation profile of London as a whole, with a similar percentage of flatted development and semi-detached and terraced housing, the Borough of Richmond overall contains a relatively even split of semi-detached, terraced houses and blocks of flats. Whilst there is a marginally higher level of detached houses in Teddington than are present across the Borough, there are notably fewer semi-detached and terraced dwellings.

**Figure 1: Accommodation Type within Study Area, Borough and Region**



Source: ONS, 2011 Census, Table DC4403EW

- 3.3 2011 Census statistics demonstrate that household tenure patterns in Teddington are compatible with the Borough overall with only marginally higher occurrences of home ownership and private renting being demonstrated. The predominant trend for home ownership is, however, notably greater than in London overall, where the pattern of renting, particularly social renting, is far more prolific. The marked preference for home ownership

establishes a picture of greater affluence within the Borough, not least of all within the Teddington area (**Figure 2**).

- 3.4 Of those homes either in ownership or shared ownership within the Teddington Study Area, nearly 2,000 are owned by persons<sup>1</sup> aged 50 and above, and of these nearly 1,500 are owned by persons aged 65 and above. Within the Borough overall, nearly 16,000 persons who own their own home (or are in shared ownership) are aged 50 and above, with over 13,000 of these being aged 65 and above.

**Figure 2: Accommodation Tenure within Study Area, Borough and Region**



Source: ONS, 2011 Census, Table DC4101EW

- 3.5 A study of household occupancy profiles (**Table 1**) identifies that there is a far higher occurrence of under occupancy in LBR than across the London region as a whole. This pattern is also replicated within the general Teddington area.
- 3.6 A pattern of high under occupancy is a potential indicator of the probability of older people remaining in family homes once their children have grown and moved away and often after only one partner remains. This would appear to be the case not only across the Borough but particularly within the Teddington area.

<sup>1</sup> Based on household reference persons, ONS, 2011 Census Table DC4601EW



**Table 1: Household over- / under-occupancy @2011 Census**

	Study Area	LBR	London
Under Occupancy of +2 or more bedrooms	32%	33%	21%
Under Occupancy of +1 bedrooms	32%	33%	28%
Occupancy rating of 0	33%	30%	39%
Over Occupancy rating of -1 bedrooms	3%	3%	9%
Over Occupancy rating of -2 or less bedrooms	0%	0%	2%

Source: ONS, 2011 Census, Table QS412EW

- 3.7 Further reference to the 2011 Census demonstrates that the percentage of elderly people living alone in the Teddington area is higher than in the Borough or Region overall (**Table 2**), with 12.4% one person households in the Study Area being residents aged 65 or over. In London overall, there are over 300,000 people over the age of 65 living alone.

**Table 2: One Person Households by age**

	Study Area	LBR	London
One person households: Aged 65 and over	1,128	9,434	312,022
Percentage of one person households	12.4%	11.8%	9.6%

Source: ONS, 2011 Census, Table KS105EW

### *Population Demographics*

- 3.8 At the time of the 2011 Census there were 186,990 people living in LBR, 20,551 of whom lived within the Teddington area. **Table 3** identifies that of the overall population, the Teddington area has a higher percentage of older residents than is the norm for London and, as is the case for LBR overall, has nearly a quarter of residents aged 55 and above.
- 3.9 The percentage of older population within the Borough continues to outweigh the percentage of older people in London overall when examining those aged 65 and above and those aged 75 and above, which would indicate that residents are remaining within the Borough into old age.

**Table 3: Age Structure, 2011**

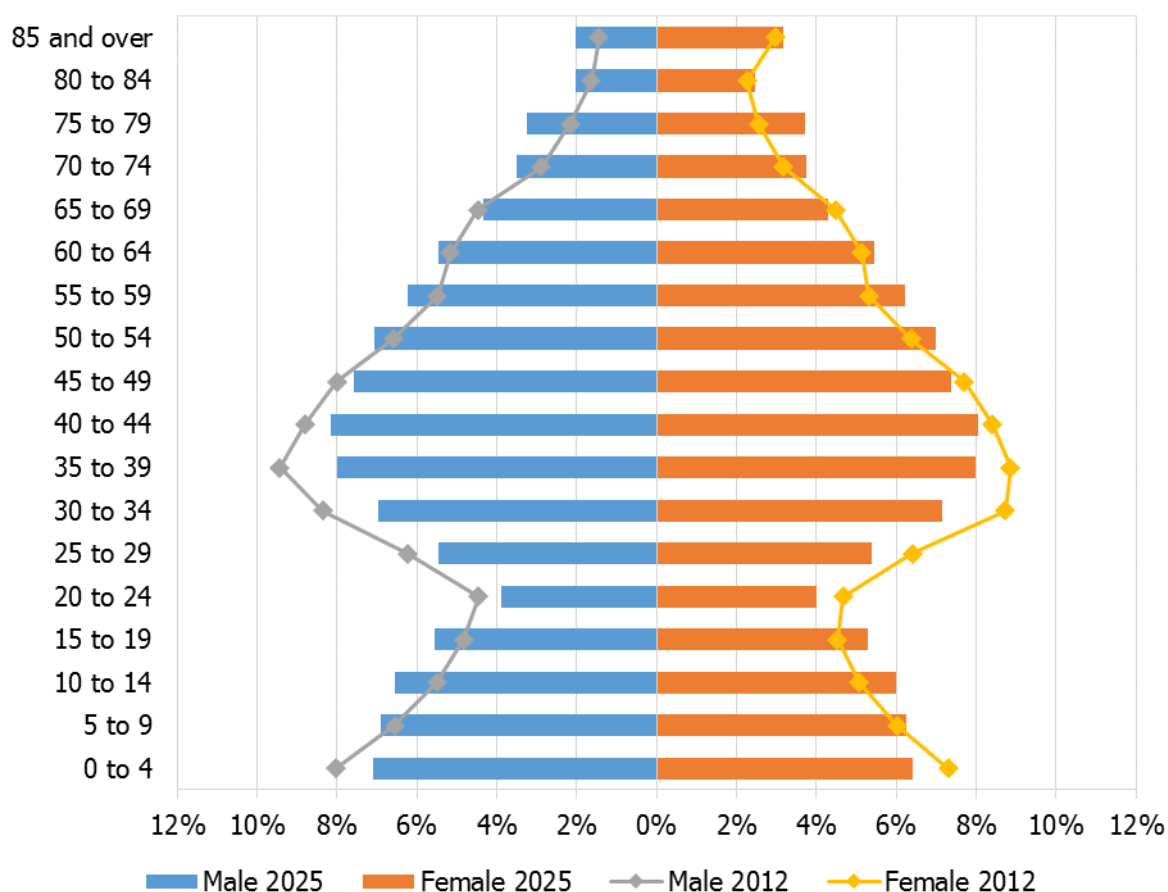
	Study Area	LBR	London
Population Aged 55+	5,064	45,505	1,619,275
Percentage of Area Population	24.6%	24.3%	19.8%
Population Aged 65+	2,770	25,296	904,749
Percentage of Area Population	13.5%	13.5%	11.1%
Population Aged 75+	1,396	12,273	431,691
Percentage of Area Population	6.8%	6.6%	5.3%

Source: ONS, 2011 Census, Table DC1117EW

- 3.10 Whilst it has been established that there are comparatively high levels of residents aged 55 and above within LBR based on 2011 Census data, it is also important to consider the pattern

of aging that will affect the Borough in future years. **Figure 3** demonstrates the change in age profile of LBR between 2012 (the year set as the base year for ONS projections) and 2025 (the year to which the London Plan sets out strategic performance indicators for specialist housing).

**Figure 3: Richmond Age Structure, 2025 vs 2012**



Source: ONS, 2012-based SNPP

- 3.11 Overall, the percentage change in the population of LBR is expected to be an increase of 16% from 189,145 residents in 2015 to 219,825 by 2025. Over this period, it is anticipated that the Borough will experience a decrease in young children between 0 and 4 years, and amongst the young adults to early middle aged bands i.e. from 20 to 24 through to 45 to 49.
- 3.12 Of particular note, however, is the increase in population that is expected to take place from the ages of 50 to 54 and above. With the exception of age band 65 to 69 which remains the same as in 2012, the older age bands are all expected to demonstrate population increases above the numbers resident in 2012.

- 3.13 It should be anticipated that this notably aging Borough-wide profile will place additional pressure on the provision of elderly care accommodation.
- 3.14 Section 4 of this Assessment will identify the existing elderly care accommodation within LBR and quantify the existing level of care provided within the Borough.



## 4. EXISTING ELDERLY CARE PROVISION

- 4.1 A detailed investigation has been undertaken to establish elderly care provision within the LBR boundary with findings presented as a quantitative summary table below (**Table 4**); a provision map demonstrating the geographical spread of elderly accommodation across the Borough at **Appendix 2** and a detailed table demonstrating the quantitative and qualitative levels of care at **Appendix 3**.
- 4.2 As elderly care provision can take several forms, a summary is provided below of the housing and care options currently available to the elderly population of the overall Borough. Information has been gathered from the Elderly Accommodation Counsel (EAC), their database website: [HousingCare.org](http://HousingCare.org), and a Barton Willmore telephone survey conducted In March 2016.

### A) Age Exclusive Housing

- 4.3 These schemes cater exclusively for older people and usually incorporate design features helpful to older people. They may include some communal facilities such as a residents' lounge or shared garden but do not provide any regular, on-site support to residents.

### B) Sheltered Housing

Termed 'Housing with Support' by the EAC includes sheltered or retirement housing which could be for either rent or owner occupation. Sheltered housing would generally involve the occupant(s) having their own flat or bungalow in a block or on a small estate where all other residents are older people. In general, such developments provide independent, self-contained homes with their own front doors which are designed to make life easier for older people with features such as raised electric sockets, lowered worktops, walk-in showers etc. Some will also be designed to accommodate wheelchair users. They are usually linked to an emergency alarm service, and some schemes will have their own 'manager' or 'warden' either living on-site or nearby. Managed schemes will also usually have some shared or communal facilities such as a lounge, laundry and garden. Sheltered Housing does not include on-site medical provision.

### C) Extra Care Sheltered Housing

Also known as very sheltered housing or assisted living, such schemes cater for older people who are becoming more frail and less able to manage for themselves. Housing is designed with the needs of frailer older people in mind and offer varying levels of care and support

available on-site. Residents will live in their own self-contained homes, with their own front doors and have a legal right to occupy the property, with properties being available for rent, ownership or part-ownership. Schemes come in a variety of built form including flats, bungalows estates or retirement villages and can provide an alternative to living in a care home. In addition to communal facilities such as lounge or garden area, Extra Care may include a restaurant or dining room, health & fitness suite, hobby rooms. Domestic support and personal care are available, usually on-site.

#### **D) Care Home**

- 4.4 These residential settings are as below but only provide personal care such as washing, dressing and the giving of medication.

#### **E) Care Home with Nursing Care**

- 4.5 These are residential settings where a number of older people live, usually in single rooms, and have access to on-site care services. Since April 2002 all homes in England, Scotland and Wales are known as 'care homes' but are registered to provide different levels of care. A home registered as a care home with nursing will provide personal care such as assistance with washing, dressing, giving medication but will also have a qualified nurse on duty 24 hrs a day to carry out nursing tasks. These homes will accommodate physically or mentally frail people in need of regular nursing attention. Some homes can be registered for a specific care need such as dementia or terminal illness.

#### *Existing Provision*

- 4.6 As summarised in **Table 4** (and detailed at **Appendix 3**), LBR currently provides 16 age-exclusive schemes; 49 sheltered housing schemes; 1 extra care sheltered housing scheme, 12 care homes and a further 7 care homes with nursing.

**Table 4: Existing Elderly Accommodation Provision – LB Richmond**

<b>Category</b>	<b>Number of Schemes</b>	<b>Overall Capacity</b>
A Age-Exclusive Housing	16	252
B Sheltered Housing	49	1,119
C Extra Care Sheltered Housing	1	41
D Care Home	12	356
E Care Home with Nursing	7	462
<b>TOTALS</b>	<b>85</b>	<b>2,230</b>

Source: EAC; \*care home vacancies identified via telephone survey conducted 11<sup>th</sup> and 14<sup>th</sup> March 2016

- 4.7 It should be noted that two of the facilities included within Sheltered Housing have been classified as Enhanced Sheltered Housing (Fullerton Court, Teddington and Sandown Court, Twickenham). Enhanced Sheltered Housing is a term used by some local authorities to describe schemes where personal care and support services are available but not 24 hours a day, seven days a week and, therefore, do not meet the extra care criteria or standards used by the Housing Corporation and the Department of Health<sup>2</sup>.
- 4.8 For the purposes of general context, based on 2011 Census data, the existing elderly accommodation provision for 2,230 elderly residents represents space for 5% of LBR residents aged 55 plus; 9% of residents aged 65 plus or 18% of residents aged 75 plus. The proposed development is anticipated to reach build completion in the year 2019. Were no additional elderly accommodation provided within the Borough, by 2019 existing provision would only be able to accommodate 4% of residents aged 55 and above; 7% of residents aged 65 and above; and 15% of residents aged 75 and above.
- 4.9 Following a telephone survey of care home facilities to establish current vacancy rates, of those establishments willing to participate it has been established that only two general nursing units are currently vacant. Whilst the majority of care homes within the Borough provide for the particular needs of dementia care, only five dementia beds are currently vacant.
- 4.10 Existing provision levels demonstrate that:
- The largest elderly care provision in Richmond Borough takes the form of sheltered housing with no medical assistance on-site, comprising 49 schemes with a total capacity of 1,119 units;
  - There is currently provision of only one Extra Care Sheltered Housing scheme which is located to the far west of the Borough, in Hampton. This scheme, the Dean Road Extra Care Housing Scheme, provides 41 units and is currently operating a long waiting list;
  - The Borough is currently only able to provide seven Care Homes with Nursing, catering for a total of 462 residents;
  - Almost all care homes and care homes with nursing currently provided in LBR are operating at full capacity i.e. with very low vacancy rates;
  - To adequately meet requirement, provision of elderly accommodation will need to increase to accommodate an aging population.

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<sup>2</sup> <http://www.extracarehousing.org.uk/models-of-extra-care-housing.aspx>



- 4.11 The spread of existing facilities (as demonstrated at **Appendix 2**) is borough-wide but includes small clusters, primarily of sheltered housing units, with the largest cluster being in the Richmond area.
- 4.12 The existing provision within the immediate vicinity of the Site comprises sheltered housing units delivered by the Fullerton Court, Hales Court, Garrett House and Virginia House schemes, between them totalling 130 units.
- 4.13 Section 5 of this Assessment will consider the identification of care need within LBR and will quantify the level of accommodation required.

## 5. IDENTIFICATION OF FUTURE NEED

- 5.1 This section of the Assessment sets out the established need for additional accommodation to meet the needs of the elderly population of LBR.
- 5.2 Following methodology provided by the DCLG in the joint DCLG/CSIP<sup>3</sup> toolkit, 'More Choice, Greater Voice', a target is established through a formula of levels of provision required per 1,000 head of population aged 75 and above. This Assessment will demonstrate the target provision needed to accommodate the existing population and the target provision required to meet the needs of the population by the year 2019. As the category Age Exclusive Housing does not fulfil any elderly care criteria, this category will be omitted from this Assessment.
- 5.3 **Table 5** demonstrates an existing shortfall of 1,065 elderly accommodation units, across all categories (excluding Age Exclusive Housing). Analysis demonstrates that existing provision falls short in every level of care category with the exception of Conventional Sheltered Housing for rent, which is over supplied by 271 units.

**Table 5: Targeted provision within LBR @ 2011 Census**

	Current Provision	Target Provision per 1,000 of over 75s	2011 LBR Population over 75 ('000s)	Target Provision
Conventional Sheltered Housing (Rent)	886	50	12.3	615
Conventional Sheltered Housing (Leasehold)	233	75	12.3	922
Care Home with Nursing	462	45	12.3	553
Care Home	356	65	12.3	799
Extra Care Sheltered Housing	41	12.5	12.3	154
<b>TOTALS</b>	<b>1,978</b>			<b>3,043</b>

Source: DCLG/CSIP 'More Choice, Greater Voice'

- 5.4 By the proposed development completion year of 2019, it is anticipated that the overall requirement for elderly accommodation will have increased by 521 to a total of 3,564 elderly units (**Table 6**).
- 5.5 By 2019, accommodation for all categories of care, with the exception of conventional sheltered housing for rent, will be in a greater state of deficit with, for example, the deficit of places within Care Homes with Nursing increasing by 104%.

<sup>3</sup> Department of Communities and Local Government/Care Services Improvement Partnership

**Table 6: Targeted provision within LBR by 2019**

	<b>Current Provision</b>	<b>Target Provision per 1,000 of over 75s</b>	<b>2019 LBR Population over 75 ('000s)</b>	<b>Target Provision</b>
Conventional Sheltered Housing (Rent)	886	50	14.4	720
Conventional Sheltered Housing (Leasehold)	233	75	14.4	1,080
Care Home with Nursing	462	45	14.4	648
Care Home	356	65	14.4	936
Extra Care Sheltered Housing	41	12.5	14.4	180
<b>TOTALS</b>	<b>1,978</b>			<b>3,564</b>

Source: DCLG/CSIP 'More Choice, Greater Voice'

- 5.6 In assessing the need for elderly care accommodation, the use of a Government prescribed, targeted provision on the population aged 75+ is overly cautious and fails to take into account the anticipated growth within the age group demonstrated by national demographics. There is, as evidenced earlier, a strong probability that the elderly population will demonstrate marked growth, from age 50 plus, compared to the 2012 age profile highlighting that, in fact, even greater demand will exist in future years.
- 5.7 Therefore, whilst using the 75 plus age group is consistent with Government guidance, the need established within this Assessment is a cautious snapshot and is likely to be significantly higher when factoring in up-to-date demographic trends.
- 5.8 Section 6 of this Assessment draws together the main findings of this Assessment and presents final conclusions.

## 6. CONCLUSIONS

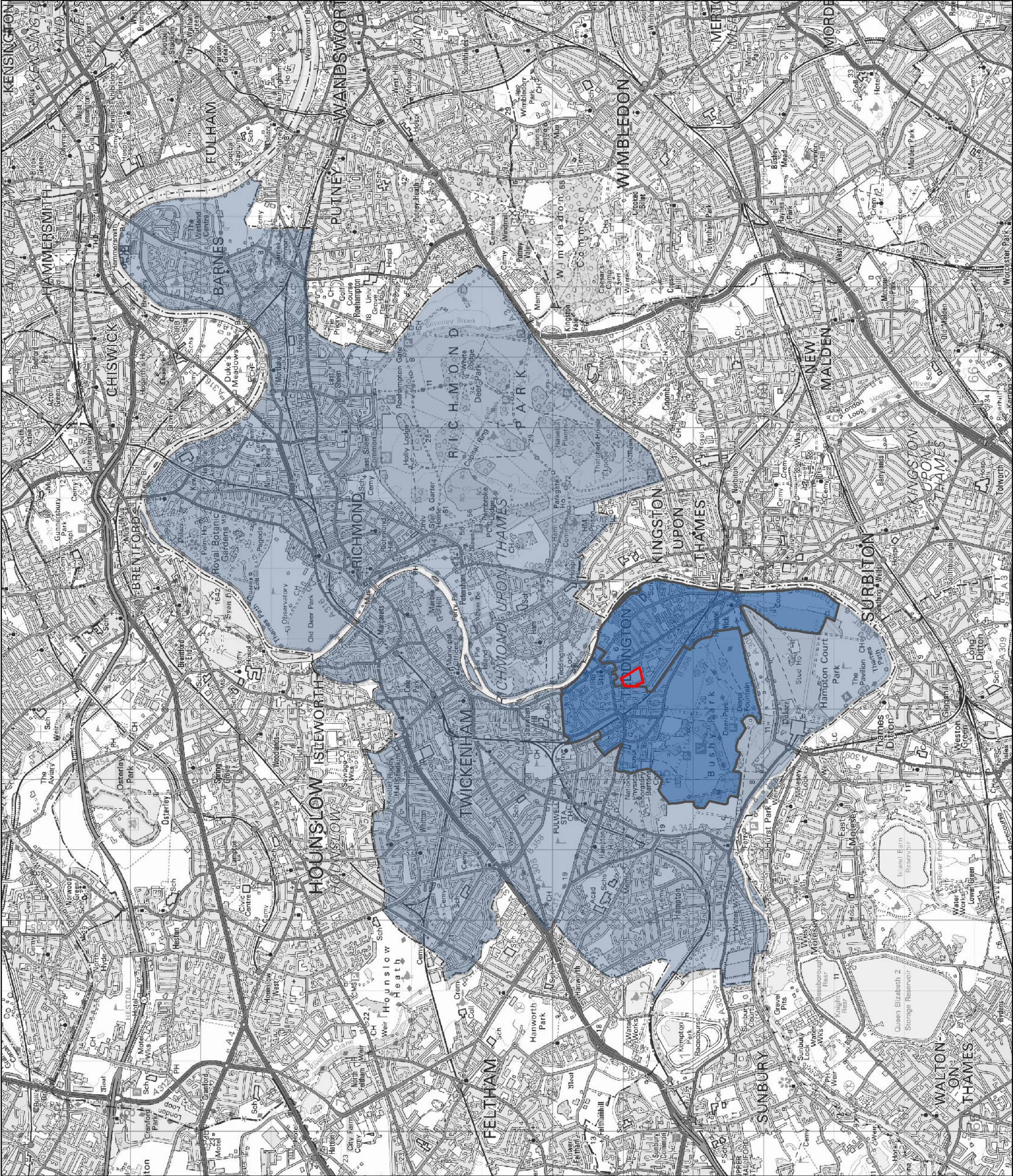
- 6.1 The London Plan (March 2015) establishes an annual benchmark for LBR of creating 105 private and 30 intermediate sale homes for the elderly, equating to an annual target of 135 units per annum. The LBR Core Strategy states that higher densities of housing, complying with an appropriate mix of uses, will be encouraged within the Borough's five town centres, one of which is Teddington. Provision of the additional, high quality, elderly accommodation proposed is, therefore, in keeping with the aspirations of both local and regional planning policy.
- 6.2 Baseline demographics identify a particularly strong desire within the Teddington Study Area for home ownership. Data further established a notably high occurrence of under occupancy of family sized homes within the Borough, not least of all within the Teddington area, where a significantly higher percentage of one person households where the occupant is aged 65 and above was identified. In a City where planning policy identifies a significant requirement for additional family sized homes, the provision of good quality, specifically tailored homes that would meet the varying needs of an older population, could be an attractive proposition to existing older residents who may wish to move to accommodation more suited to their requirements and, in the process, release larger dwellings onto the private market.
- 6.3 Demographic data further identified the fact that the Teddington area is home to a larger percentage of older residents whether studying the 55 and above age range, the 65 and above or the 75 and above. It further demonstrated that the Borough's population will continue to increase its percentage of older population with marked increases of both male and female residents aged 75 to 79 between the years 2012 and 2025. This substantiates the expectation of regional and local planning policy that the City will witness an increasingly aging population going forward.
- 6.4 An examination of existing elderly care accommodation established that the majority of provision is in the form of conventional sheltered housing with capacity for in the region of 1,119 residents. Only one extra care sheltered housing establishment exists, located to the far west of the Borough in the Hamptons. In addition, only seven care homes with nursing exist, these being relatively widely spread. The conventional sheltered housing provision is spread in large to small clusters, mainly around the major towns within the Borough, the largest cluster being within the town of Richmond itself.
- 6.5 Following a telephone survey of care home facilities, it is apparent that borough-wide provision is already operating to almost full capacity.

- 6.6 Assessment of future need, based on Government designed methodology, establishes that there is a current shortfall of elderly care accommodation totalling 1,065 units. By the year 2019, when the proposed development could become available, there would be an increased shortfall of 1,586 units if no further provision were made. Additional provision is, and will be, required for all levels of care with the exception of conventional sheltered housing for rent.
- 6.7 Overall, it is considered that the development of additional elderly care accommodation would have a considerably beneficial effect in:
- Meeting with policy requirements which acknowledges that due to limited land supply, new developments must be directed at identified local needs;
  - Providing for the needs of the existing and future populations of the Borough which have been established by this Assessment, and
  - Bolstering the supply of categories of care which are, to date, poorly represented in the Borough i.e. extra care sheltered housing and care homes with nursing.

## **APPENDIX 1**







Legend

- Application Site
- Study Area
- LB Richmond-Upon-Thames

Appendix 1

NB: Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation, inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

Project

Teddington Sports Ground  
LB Richmond-Upon-Thames

Drawing Title

Site Location Plan

Date	Scale	Drawn	Checked
09.03.16	1:50,000 @A3	VL	SM
Project No	Drawing No	Revision	
26031	GIS01	-	

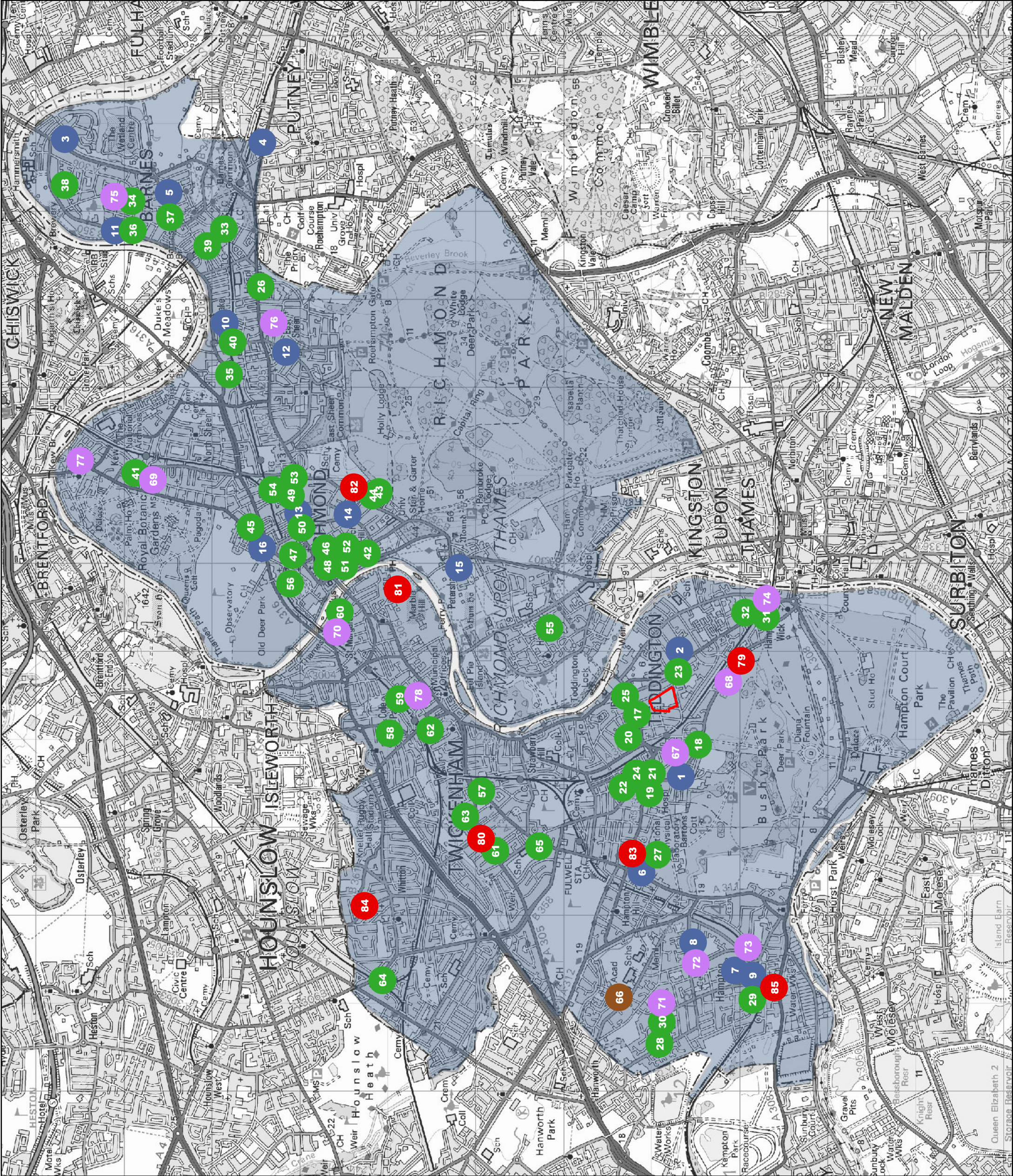




## **APPENDIX 2**







Legend

- Application Site
- A - Age Exclusive Housing
- B - Sheltered Housing
- C - Extra Care Sheltered Housing
- D - Care Home
- E - Care Home with Nursing

Appendix 2

NB: Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation, inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

NB: Data relating to existing elderly accommodation represents that provided directly from the EAC and as such, Barton Willmore shall not be liable for the accuracy of the data derived from an external source.

NB: Locations are indicative and may have been spread to avoid overlapping.

Project	Date	Scale	Drawn	Checked
Teddington LB Richmond-Upon-Thames	09.03.16	1:40,000 @A3	VL	SM
Drawing Title	Project No	Drawing No	Revision	
Existing Elderly Accommodation Provision	26031	GIS02	-	





## **APPENDIX 3**





APPENDIX 3 - EXISTING ELDERLY ACCOMMODATION PROVISION

No	Category	Facility Name	Facility Address	Postcode	Housing age-exclusive	Housing sheltered	Housing extra care	Care home	Care home with nursing	Units	Vacancies	Comments	Dementia Beds	Tenure
1	A	Medians Close	Park Road, Teddington, Surrey, TW11 0AL	TW11 0AL	Y	N	N	N	N	18				Rent
2	A	Chiswick Road	Chiswick Road, Middlesex, TW11 9LE	TW11 9LE	Y	N	N	N	N	26				Rent
3	A	Stones Lane 10 & 12	Stones Lane, London, SW13 8EF	SW13 8EF	Y	N	N	N	N	12				Rent
4	A	Briars Lane	Barnes, London, SW15 6US	SW15 6US	Y	N	N	N	N	20				Rent
5	A	Julian Court	1 Grange Road, Barnes, London, SW13 9HQ	SW13 9HQ	Y	N	N	N	N	7				Rent
6	A	Templeton Lodge	High Street, Hampton Hill, Hampton, Middlesex, TW12 1NY	TW12 1NY	Y	N	N	N	N	28				Private
7	A	Hampton Parochial Almshouses	1-12 Jubilee House, Ashley Road, Hampton, Middlesex, TW12 2JA	TW12 2JA	Y	N	N	N	N	12				Rent
8	A	Wensleydale Road	Hampton, Middlesex, TW12 2LY	TW12 2LY	Y	N	N	N	N	20				Rent
9	A	Mary Rose Close	Hampton, Surrey, TW12 2HN	TW12 2HN	Y	N	N	N	N	21				Rent
10	A	Capel Court	29 Mullins Path, Mortlake, London, SW14 8EZ	SW14 8EZ	Y	N	N	N	N	8				Rent
11	A	Coniston Close	Lonsdale Road, Barnes, London, SW13 9QS	SW13 9QS	Y	N	N	N	N	6				Private
12	A	Howarth House	184 Sheen Lane / Sheen Gate Gardens, East Sheen, London, SW14 8LF	SW14 8LF	Y	N	N	N	N	19				Rent
13	A	Alberta Court	Princes Road, Richmond, Surrey, TW10 6DY	TW10 6DY	Y	N	N	N	N	22				Rent
14	A	Kingsbury House	10 Kings Road, Richmond, Surrey, TW10 6NW	TW10 6NW	Y	N	N	N	N	17				Rent
15	A	Tree Close	Petersham Road, Petersham, Richmond, Surrey, TW10 7BA	TW10 7BA	Y	N	N	N	N	12				Rent
16	A	Bennis Walk	Richmond, Surrey, TW9 2SY	TW9 2SY	Y	N	N	N	N	5				License
17	B	Fullerton Court	27 Udrey Park Road, Teddington, Middlesex, TW11 9BF	TW11 9BF	N	N	Y	N	N	38				Private
18	B	Colville Court	30 Park Road, Teddington, Middlesex, TW11 0AQ	TW11 0AQ	N	N	Y	N	N	19				Rent
19	B	Fishers Ct, Bartons Ct & Waterhouse Ct	66 Walpole Road, Teddington, Middx, TW11 8TQ	TW11 8TQ	N	Y	Y	N	N	18				Private
20	B	Hales Court	14 Field Lane, Teddington, Middx, TW11 9BA	TW11 9BA	N	N	Y	N	N	17				Private
21	B	Oval Court	5 Broad Street, Teddington, Middlesex, TW11 8QZ	TW11 8QZ	N	Y	Y	N	N	10				Rent
22	B	Argyle House	Somerset Road, Teddington, Middlesex, TW11 8RU	TW11 8RU	N	Y	Y	N	N	7				Rent
23	B	Garrett House	166 Kingston Lane, Teddington, Middlesex, TW11 9HD	TW11 9HD	N	Y	Y	N	N	30				Rent
24	B	Gresham House	Walpole Road, Teddington, Middlesex, TW11 8PP	TW11 8PP	N	N	Y	N	N	29				Rent
25	B	Virginia House	19 Kingston Lane, Teddington, Middlesex, TW11 9HL	TW11 9HL	N	Y	Y	N	N	45				Rent
26	B	Oxford House	163 Upper Richmond Road West, East Sheen, London, SW14 8EB	SW14 8EB	N	Y	Y	N	N	9				Rent
27	B	Bay Leaf Close	Hampton Hill, Hampton, Middlesex, TW12 1JD	TW12 1JD	N	Y	Y	N	N	24				Rent
28	B	Westminster Close	Hampton Hill, Hampton, Middlesex, TW12 3SD	TW12 3SD	N	Y	Y	N	N	38				Private
29	B	Hampton House	Hampton, Surrey, TW12 3JD	TW12 3JD	N	Y	Y	N	N	36				Rent
30	B	Nation Court	Stanborough Close, Hampton, Middlesex, TW12 3YD	TW12 3YD	N	Y	Y	N	N	30				Rent
31	B	Bennet Close	Park Road, Hampton Wick, Surrey, KT1 4AT	KT1 4AT	N	Y	Y	N	N	18				Rent
32	B	Robert Black House	5 Glamorgan Road, HAMPTON WICK, Kingston, Surrey, KT1 4JD	KT1 4JD	N	Y	Y	N	N	22				Rent
33	B	Sheridan Place	Brookwood Avenue, Barnes, London, SW13 9LH	SW13 9LH	N	N	Y	N	N	15				Private
34	B	Walsingham Lodge and Berkeley Road	Berkley Road, Barnes, London, SW13 9LZ	SW13 9LZ	N	Y	Y	N	N	38				Rent
35	B	Lady Elizabeth House	67a Lower Richmond Road, Mortlake, London, SW14 7HJ	SW14 7HJ	N	Y	Y	N	N	31				Rent
36	B	Diana House	40 Lonsdale Road, Barnes, London, SW13 9QP	SW13 9QP	N	N	Y	N	N	31				Rent
37	B	The Grange	47 Church Road, Barnes, London, SW13 9HQ	SW13 9HQ	N	Y	Y	N	N	8				Rent
38	B	Baynes House	Nowell Road, Barnes, London, SW13 9BX	SW13 9BX	N	Y	Y	N	N	10				Rent
39	B	Brookwood Lodge	Brookwood Avenue, Westwood Road, Barnes, London, SW13 0LU	SW13 0LU	N	N	Y	N	N	31				Rent
40	B	Frimstone House	South Worple Way, Mortlake, London, SW14 8TN	SW14 8TN	N	Y	Y	N	N	11				Rent
41	B	Palmer House	1 Ennendale Road, Kew, Richmond, Surrey, TW9 3FG	TW9 3FG	N	N	Y	N	N	9				Rent
42	B	Hovson Terrace	Richmond Hill, Richmond, Surrey, TW10 6RT	TW10 6RT	N	Y	Y	N	N	24				Rent
43	B	Friehbert House	Grove Road, Kingsmead, Richmond, Surrey, TW10 6HT	TW10 6HT	N	Y	Y	N	N	22				Rent
44	B	Isabella Court	Grove Road, Richmond, Surrey, TW9 2AG	TW9 2AG	N	Y	Y	N	N	36				Rent
45	B	Cleanwater House	24 Grosvenor Road, Richmond, Surrey, TW10 6PB	TW10 6PB	N	Y	Y	N	N	34				Private
46	B	Belvoir Lodge	Sheen Road, Richmond, Surrey, TW10 6AE	TW10 6AE	N	Y	Y	N	N	25				Private
47	B	Belvoir Lodge	The Grange, Richmond, Surrey, TW10 6AJ	TW10 6AJ	N	Y	Y	N	N	32				Private
48	B	Belvoir Lodge	Richmond, Surrey, TW9 1UX	TW9 1UX	N	Y	Y	N	N	10				Rent
49	B	Church Estate Almshouses	Worple Way, Richmond, Surrey, TW10 6DA	TW10 6DA	N	Y	Y	N	N	18				Rent
50	B	Houben's Almshouses	The Vineyard, Richmond, Surrey, TW10 6AH	TW10 6AH	N	Y	Y	N	N	9				Rent
51	B	Michael's Almshouses	Queen Elizabeth's Almshouses	TW10 6AQ	N	Y	Y	N	N	16				Rent
52	B	Queen Elizabeth's Almshouses	The Vineyard, Richmond, Surrey, TW10 6AQ	TW10 6AQ	N	Y	Y	N	N	8				Rent
53	B	William Hickey's Almshouses	Sheen Road, Richmond, Surrey, TW9 1XB	TW9 1XB	N	Y	Y	N	N	49				Rent
54	B	Calvert Court	Manor Park, Richmond, Surrey, TW9 1XY	TW9 1XY	N	Y	Y	N	N	37				Rent
55	B	Redknapp House	Cleves Road, Hem, Richmond, Surrey, TW10 7LE	TW10 7LE	N	Y	Y	N	N	24				Rent
56	B	The Hussey Trust	2 Portland Terrace, The Green, Richmond, Surrey, TW9 1QQ	TW9 1QQ	N	Y	Y	N	N	9				Rent
57	B	Gifford Lodge	25 Popes Avenue, Twickenham, Middlesex, TW2 5TP	TW2 5TP	N	Y	Y	N	N	29				Private
58	B	Perry Court	Grimwood Road, Twickenham, Middlesex, TW1 1BA	TW1 1BA	N	Y	Y	N	N	21				Private
59	B	Candler Almshouses	Anyand Park Road, Twickenham, Middlesex, TW1 3HJ	TW1 3HJ	N	Y	Y	N	N	10				Rent
60	B	Deniel Lodge	Park Road, Twickenham, Twickenham, Middlesex, TW1 2QF	TW1 2QF	N	Y	Y	N	N	12				Rent
61	B	Enslight House	Stanes Road, Twickenham, Middlesex, TW2 5EQ	TW2 5EQ	N	Y	Y	N	N	8				Rent
62	B	Howe Lodge	4 Grosvenor Road, Twickenham, Middlesex, TW1 4AQ	TW1 4AQ	N	Y	Y	N	N	28				Rent
63	B	James Darby House	11 Mileway Road, Twickenham, Middlesex, TW2 6SA	TW2 6SA	N	Y	Y	N	N	30				Rent
64	B	Somerville House	1 Rodney Road, Twickenham, Middlesex, TW2 7AL	TW2 7AL	N	Y	Y	N	N	29				Rent
65	B	Sandown Court	176 Hampton Road, Twickenham, Middlesex, TW2 9NE	TW2 9NE	N	Y	Y	N	N	23				Rent
66	C	Dean Road Extra Care Housing Scheme	176 Dean Road, Hampton, Richmond, TW12 1BF	TW12 1BF	N	N	Y	N	N	41	Waiting List			Rent (shared ownership)
67	D	Homehead	28 Park Road, Teddington, Middlesex TW11 0AQ	TW11 0AQ	N	N	N	Y	N	30	2		30	
68	D	Deer Lodge	22 Sandy Lane, Teddington, Middlesex TW11 0DR	TW11 0DR	N	N	N	Y	N	14	0		14	
69	D	Victoria House	2-4 Ennendale Road, Kew, Richmond TW9 3PG	TW9 3PG	N	N	N	Y	N	30	0		0	
70	D	Dalmead	10-12 Rwerdale Gardens, East Twickenham, Middlesex TW1 2DA	TW1 2DA	N	N	N	Y	N	49	0		49	
71	D	Marling Court	Bramble Lane, off The Avenue, Hampton, Middlesex TW12 3XB	TW12 3XB	N	N	N	Y	N	37	0		37	
72	D	Redcots	96 Wensleydale Road, Hampton, Middlesex TW12 2LY	TW12 2LY	N	N	N	Y	N	18		Due to close in 3 months time		
73	D	St Mary's House	71 Ormond Avenue, Hampton TW12 2RT	TW12 2RT	N	N	N	Y	N	24			12	
74	D	Orione House	12 Station Road, Hampton Wick, Kingston upon Thames KT11 4HG	KT11 4HG	N	N	N	Y	N	34	2		34	
75	D	Vera Gray House	27 Ferry Road, Barnes, London SW13 9PP	SW13 9PP	N	N	N	Y	N	38	0		38	
76	D	Alexander House (Palwell Park)	1-3 Palewell Park, East Sheen, London SW14 8JQ	SW14 8JQ	N	N	N	Y	N	16	1		16	
77	D	Cecil Court	2-4 Priory Road, Kew, Richmond TW9 3DG	TW9 3DG	N	N	N	Y	N	45				
78	D	Nightingale House (Stratford Road)	10 Stratford Road, Twickenham, Middlesex TW1 3AE	TW1 3AE	N	N	N	Y	N	21				
79	E	Deer View Care Centre	Bushey Park Road, Teddington, London TW11 0DX	TW11 0DX	N	N	N	Y	N	60	1 non dementia		22	
80	E	Brinsworth House Residential And Nursing Home	72 Stanes Road, Twickenham, Middlesex TW2 5AL	TW2 5AL	N	N	N	Y	N	36	1 non dementia		0	
81	E	Lynde House Care Home	Meadowbank, 28 Cambridge Park, Twickenham, Middlesex TW1 2JB	TW1 2JB	N	N	N	Y	N	72	0		0	
82	E	Greville House	117 Hampton Road, Richmond TW10 6HR	TW10 6HR	N	N	N	Y	N	59				
83	E	Laurel Dene	Whitfarm Lodge	Twickenham, Middlesex TW2 7BY	N	N	N	Y	N	99				
84	E	Whitfarm Lodge	Vicarage Road, Twickenham, Middlesex TW2 7BY	Twickenham, Middlesex TW2 7BY	N	N	N	Y	N	60				
85	E	Hampton Care	Upper Sunbury Road, Hampton, Middlesex TW12 2DW	TW12 2DW	N	N	N	Y	N	76	0		0	

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# Former Imperial College Private Ground, Teddington, Richmond Upon Thames Landscape and Visual Statement

Prepared on behalf of Quantum Group

February 2017



# Former Imperial College Private Ground, Teddington, Richmond Upon Thames

## Landscape and Visual Statement

Prepared on behalf of Quantum Group

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**APPENDICES**

- Appendix 1:** Site Appraisal Photographs
- Site Context Photographs

## 1.0 INTRODUCTION

- 1.1 Barton Willmore Landscape Planning and Design were commissioned by the Quantum Group in January 2017 to undertake a preliminary Landscape and Visual Appraisal in support of the representations promoted through the emerging London Borough of Richmond Upon Thames Local Plan for the Former Imperial College Private Ground ('The Site'), at Udney Park Road, Teddington, Richmond Upon Thames and the commission is to undertake a review of the potential designation of the Site as Local Green Space, as proposed in the London Borough of Richmond Upon Thames Local Plan Proposals Map Changes Local Plan, Publication Version for consultation 4th January 2017 – 15th February 2017.
- 1.2 As of September 2015, the Quantum Group are the freehold owners of the Site. From 1920s, up until its acquisition in 2015, the Site has been in private playing field use for various educational institutions, with access granted to a small number of specific groups occasionally and on a temporary basis.
- 1.3 The Quantum Group acquired the Site because it was substantially underutilised and presented an opportunity for proposals to be brought forward that would materially benefit residents of Teddington and beyond, whilst preserving the openness of the Site and its townscape importance.
- 1.4 The following material supports the Landscape and Visual; Appraisal:

**Figure 1:** Landscape and Visual Context Plan

**Figure 2:** Site Appraisal Plan

**Figure 3:** Site plan showing ownership boundary and indicative use zones to accompany Quantum Group's Publication Consultation representation form

**Figure 4:** Illustrative Proposals

**Appendix 1:** Site Appraisal Photographs  
Site Context Photographs

## 2.0 LANDSCAPE AND VISUAL CONTEXT

### Site Context

- 2.1 The Site is located within Teddington in the London Borough of Richmond Upon Thames. Teddington is situated on the northern bank of the River Thames, and extends along its High Street from the River Thames in the east to Bushey Park in the west, as illustrated on **Figure 1: Landscape and Visual Context Plan**. The Borough of Richmond Upon Thames is one of the “greenest” in London, with substantial public access to parks, gardens and squares.
- 2.2 The Site is bounded by residential development on all sides. The Site immediately adjoins Kingston Lane on its eastern boundary and Cromwell Road on its southern boundary, with large residential villas fronting on to both Kingston Lane and Commercial Road. The Site adjoins Udney Park Road for the majority of its western boundary, with smaller residential dwellings fronting onto Udney Park Road, and a cluster of residential dwellings backing onto the Site between Cromwell Road and Udney Road. Fullerton Court, a complex of over 55’s retirement apartments abuts the northern boundary of the Site.
- 2.3 Teddington High Street is located some 170 metres to the north of the Site; Teddington Railway Station is located some 250 metres to the west of the Site, on Station Road, which is a continuation of Cromwell Road.

### Topography and Hydrology

- 2.4 Teddington and the Site are located in the valley floor of the River Thames. The River Thames is located some 515 metres to the east of the Site. The surrounding landform is predominantly flat, at approximately 9.0 metres AOD, as characteristic of the river valley floor, and as shown on **Figure 1: Landscape and Visual Context Plan**.

### Settlement, Open Space and Vegetation

- 2.5 Teddington forms part of the extensive conurbation of south-west London, surrounded by and contiguous with Strawberry Hill, Ham, Hampton Hill and Hampton, in the immediate locality. Teddington is predominantly residential, with its character defined by Victorian terraces, Edwardian detached and semi-detached houses, and mid-rise modern residential development; and few tall buildings.
- 2.6 The extensive swathe of south west London is punctuated by substantial tracts of parkland and open space, such as Richmond Park; Ham House Gardens and Grounds; Bushy Park; Hampton Court and Hampton Court Park; and that associated with the River Thames and River Crane; as well as numerous golf courses.



- 2.7 Substantial vegetation, both formal and naturalistic in character occurs within the parklands, open space and golf courses. Within the settlement, vegetation is predominantly street trees and within gardens.

#### **Public Access**

- 2.8 The Site is private land with no public access.

#### **Landscape Planning Context**

- 2.9 The relevant Landscape Planning Policy Context, for the Site includes landscape and visual related policies set out in:
- National Planning Policy Framework (March 2012) (NPPF)
  - The London Plan (2016)
- 2.10 London Borough of Richmond Upon Thames Local Development Framework: Development Management Plan Adopted November 2011
- London Borough of Richmond Upon Thames Supplementary Planning Document: Design Quality (Adopted February 2006)
  - London Borough of Richmond Upon Thames Local Plan, Publication version for consultation 4th January 2017 – 15th February 2017
  - London Borough of Richmond Upon Thames Local Plan Proposals Map Changes Local Plan, Publication Version for consultation 4th January 2017 – 15th February 2017

#### *National Planning Policy Framework*

- 2.11 In summary, National planning policy, as set out in the National Planning Framework (NPPF), promotes sustainable development, including the consideration of the economic, social and environmental role proposed development would contribute, both in terms of potential benefits and harm. The Site does not currently fall within any areas covered by policies within the NPPF, as set out in Footnote 9 of Paragraph 14, that would restrict the presumption in favour of sustainable development, subject to complying with and meeting the criteria of Paragraph 14.
- 2.12 The London Borough of Richmond Upon Thames Proposals Map Changes Local Plan, publication version for consultation 4th January 2017 – 15th February 2017, proposes that the Site is designated as Local Green Space, which is a designation that falls within Footnote 9 of Paragraph 14 of the NPPF. Paragraph 77 of the NPPF addresses Local Green Space, setting out that:

***“The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:***

- *where the green space is in reasonably close proximity to the community it serves;*
- *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *where the green area concerned is local in character and is not an extensive tract of land.”*

2.13 Paragraph 78 also notes that:

***“Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts.”***

2.14 National planning policy also seeks to provide protection for the intrinsic character and beauty of the countryside and the natural environment; and the protection and enhancement of valued landscapes. Policy also seeks to ensure that new development is of high quality design; responds to local character and history, and local distinctiveness; includes for the provision of Green Infrastructure; and that it establishes a strong sense of place to create attractive and comfortable places in which to live, work and visit.

*London Borough of Richmond Upon Thames Local Development Framework: Development Management Plan (Adopted November 2011)*

2.15 Within the adopted Development Management Plan, the Site is allocated, under Policy DM OS 3, as “Other Open Land of Townscape Importance”. Policy DM OS 3 states that:

***“Other Open Land of Townscape Importance***

***Other open areas that are of townscape importance will be protected and enhanced in open use.***

***It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria must be taken into account when assessing appropriate development:***

***1. It must be linked to the functional use of the Other Open Land of Townscape Importance; or***

***2. It can only be a replacement or minor extension of existing built facilities;***

***3. In addition to 1. or 2., it does not harm the character and openness of the open land.***

***Improvement and enhancement of the openness and character of other open land and measures to open up views into and out of designated other open land will be encouraged where appropriate.***

***When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account."***

2.16 The supporting text to Policy DM OS 3 sets out that:

***"4.1.6 Other Open Land of Townscape Importance (OOLTI) can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. The designated areas are shown on the Proposals Map but there will also be other areas which could be considered as being of local value to the area and townscape which merit protection.***

***4.1.7 In some parts of the borough, open areas, including larger blocks of back gardens, which are not extensive enough to be defined as green belt or metropolitan open land, act as pockets of greenery of local rather than London-wide significance. Many of these are of townscape importance, contributing to the local character and are valued by residents as open spaces in the built up area. Policy DM HO 2 'Infill Development' and Policy DM HO 3 'Backland Development' also recognise the importance of gardens, which will be considered as greenfield sites. Green oases are particularly important and will be protected in areas of high density development and town centres.***

***4.1.8 OOLTI should be predominantly open or natural in character. The following criteria are taken into account in defining OOLTI:***

- ***Contribution to the local character and/or street scene, by virtue of its size, position and quality.***
- ***Value to local people for its presence and openness.***
- ***Immediate or longer views into and out of the site, including from surrounding properties.***
- ***Value for biodiversity and nature conservation.***

***Note that the criteria are qualitative and not all need to be met.***

***4.1.9 The purpose of this policy is to safeguard this open land and ensure that it is not lost to other uses without good cause. Protecting and opening up views into and out of designated other open land is encouraged because of the contribution to the distinctive character of an area and the benefits to all. Where a***

***comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for social community or educational uses, it may be acceptable to re-distribute the open land within the site, providing that the new open area is equivalent or improved in terms of size, shape, location, quality and potential ecological value."***

*London Borough of Richmond Upon Thames Local Plan, Publication version for consultation, 4th January 2017 – 15th February 2017*

- 2.17 The London Borough of Richmond Upon Thames Local Plan, Publication Version, at Paragraph 5.2, sets out the policy for Green Belt, Metropolitan Open Land and Local Green Space, under Policy LP 13, which states that, with specific reference to Local Green Space:

***"Policy LP 13***

***Local Green Space***

***D. Local Green Space, which has been demonstrated to be special to a local community and which holds a particular local significance, will be protected from inappropriate development that could cause harm to its qualities."***

- 2.18 Paragraphs 5.2.8 to 5.2.10 provide supporting text with regard to Policy LP13, with specific regard to Local Green Space, as set out below:

***"5.2.8 Local Green Space, as identified on the Proposals Map, is green or open space which has been demonstrated to have special qualities and hold particular significance and value to the local community which it serves.***

***5.2.9 In line with the NPPF, managing development within a Local Green Space should be consistent with policy for Green Belt. Development, which would cause harm to the qualities of the Local Green Space, will be considered inappropriate and will only be acceptable in very special circumstances where benefits can be demonstrated to significantly outweigh the harm.***

***5.2.10 The following criteria are taken into account when defining Local Green Space:***

- ***The site is submitted by the local community;***
- ***There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;***
- ***The site is not land allocated for development within the Local Plan;***
- ***The site is local in character and is not an extensive tract of land;***
- ***Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly***

*accessible, it is within reasonably close proximity to the community it serves;*

- *The Local Green Space is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;*
- *The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means.*

2.19 With regard to the Proposals Map Changes for Publication Local Plan, the changes include designating the Site (given the title in the emerging Local Plan as Udney Park Playing Fields) as Local Green Space, as set out in Section 2.2: Local Green Space, and with reference to Paragraphs 2.2.1 to 2.2.3. The justification for the designation is set out in Paragraphs 2.2.2 to 2.2.3, and states:

***“Reason for Local Green Space Designation***

***2.2.2 Udney Park Playing Fields are already designated as Other Open Land of Townscape Importance (OOLTI) and also benefit from a designation as an Asset of Community Value.***

***2.2.3 Policy LP 13 Green Belt, Metropolitan Open Land and Local Green Space sets out the policy guidance in relation to Local Green Space, including criteria for designation. The Council has assessed the site against the criteria as set out in the Publication Local Plan policy as well as national guidance, and considers that it meets all of the following criteria:***

- *The site is submitted by the local community;*
- *There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;*
- *The site is not land allocated for development within the Local Plan;*
- *The site is local in character and is not an extensive tract of land;*
- *Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves;*
- *The Local Green Space is demonstrably special to a local community and holds a particular*
- *local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;*
- *The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means.”*

- 2.20 The London Borough of Richmond Upon Thames Local Plan, Publication Version, retains a policy for designating Other Open Land of Townscape Importance, in the amend form of Policy LP 14, which sets out that:

***“Other Open Land of Townscape Importance***

***Other open areas that are of townscape importance will be protected in open use, and enhanced where possible.***

***It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria will be taken into account when assessing whether development is appropriate:***

***a. it must be linked to the functional use of the Other Open Land of Townscape Importance;***

***or***

***b. it can only be a replacement of, or minor extension to, existing built facilities; and***

***c. it does not harm the character or openness of the open land.***

***Improvement and enhancement of the openness or character of other open land and measures to open up views into and out of designated other open land will be encouraged.***

***When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account.”***

- 2.21 Paragraphs 5.3.1 to 5.3.7 provide the supporting text to Policy LP14, setting out that:

***“5.3.1 The purpose of this policy is to safeguard open land of local importance and ensure that it is not lost to other uses without good cause. Areas designated as Other Open Land of Townscape Importance (OOLTI) form an important part of the multi-functional network of Green Infrastructure and they can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. The designated areas are shown on the Proposals Map.***

***5.3.2 In some parts of the borough, open areas, including larger blocks of back gardens, act as pockets of greenery of local rather than strategic significance. Many of these are of townscape***

*importance, contributing to the local character and are valued by residents as open spaces in the built up area. Green oases are particularly important in areas of higher density development including in the borough's centres.*

**5.3.3** *This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value, and therefore merit protection.*

**5.3.4** *OOLTI should be predominantly open or natural in character. The following criteria are taken into account when defining OOLTI (note that the criteria are qualitative and not all need to be met):*

- *Contribution to the local character and/or street scene, by virtue of its size, position and quality.*
- *Value to local people for its presence and openness.*
- *Immediate or longer views into and out of the site, including from surrounding properties.*
- *Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure'.*
- *Value for biodiversity and nature conservation.*

**5.3.5** *This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value in line with the criteria set out above, and therefore merit protection.*

**5.3.6** *Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for community and social infrastructure including educational uses, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness.*

**5.3.7** *Protecting and opening up views into and out of designated OOLTI is encouraged because of the contribution they can make to the distinctive character of an area and the benefits to all."*

*London Borough of Richmond Upon Thames Supplementary Planning Document: Design Quality  
(Adopted February 2006)*

- 2.22 The London Borough of Richmond Upon Thames Supplementary Planning Document: Design Quality provides the overall context for design guidance in the London Borough of Richmond. It notes that this guidance should be *"taken into account when designing individual buildings, groups of buildings, redevelopment and infill schemes, extensions and even minor building works"*. The guidance is intended to guide quality and provides an

assessment of the character of the Borough, to assist in defining the broader setting and environmental qualities of a site.

2.23 The guidance sets out objectives for the delivery of high quality design and development, covering:

- Character
- Continuity and Enclosure
- Public Realm
- Ease of Movement
- Legibility
- Adaptability; and
- Diversity.



### 3.0 TOWNSCAPE CHARACTER

3.1 The assessment of landscape or townscape character involves a descriptive approach that seeks to identify and define the distinct character of landscapes and townscapes that make up the country. In accordance with the European Landscape Convention this approach recognises the intrinsic value of all landscapes, not just 'special' landscapes, as contributing factors in people's quality of life. It also ensures that account is taken of the different roles and character of different areas, in accordance with the NPPF Core Principles.

3.2 The description of each landscape or townscape character area is used as a basis for evaluation to make judgements to guide, for example, development or landscape management.

3.3 The Site is set entirely within the immediately surrounding townscape context, and is surrounded by and contained by residential development on all sides. The relevant published townscape character assessment is:

- London Borough of Richmond Supplementary Planning Document: Design Quality (Adopted 2006)

*London Borough of Richmond Supplementary Planning Document: Design Quality (Adopted 2006)*

3.4 With regard to the urban form and Character Areas of the Borough, the guidance notes that the

***“The environmental Character of the Borough since its nineteenth century expansion has resulted in a group of urbanised areas, connecting former villages, divided by open space, linked by roads and interwoven by railways.”***

3.5 Twelve distinctive character areas have been identified, ***“defined by their cohesive identity, or location of both natural and manmade barriers such as the river, open space and the railways”.***

3.6 The Site falls on the southern edge of the Strawberry Hill and Teddington East Character Area, and immediately adjoins the Hampton Wick and South Teddington Character Area, as illustrated on **Figure 1: Landscape and Visual Context Plan**, with the Hampton Hill and Teddington West Character Area located to the west of the Site.

3.7 The Strawberry Hill and Teddington East Character Area, which includes the Site and extends east to the River Thames, is described as:

*"A suburban character area less tightly developed than Twickenham with small pockets of open space and large gardens with a significant number of trees. Teddington High Street Retains a mix of attractive Victorian and Edwardian shopping parades (some with original shop fronts) and Artisan Cottages in small side streets. Strawberry Hill House and Grounds exhibit an exuberant Gothic style. The Strawberry Hill residential area is leafy and contains a mix of large older homes and twentieth century infill houses and flats."*

- 3.8 The Hampton Wick and South Teddington Character Area extends south from the Site, south of Cromwell Road and east to the River Thames, and is described as:

*"The old village centre of Hampton Wick has a strong village character through uniform building styles and narrow winding streets. South of the railway line development is mostly Georgian, Victorian and Edwardian and small in scale with a tree lined backdrop relating to Hampton Court. North of the railway line there is more variation in style and age of residential development. Houses to Lower Teddington Road and the River [Thames] are more substantial in scale and there are a number of modern residential apartment blocks."*

- 3.9 The Hampton Hill and Teddington West Character Area is located to the west of the Site, adjoining the rear gardens of residential properties on the west side of Udney Park Road which adjoins the Site, with a clear change in pattern of residential development. The Hampton Hill and Teddington West Character Area is described as:

*"Hampton Hill High Street maintains its village character, composed of Victorian shops (converted from cottages), some listed houses, a picturesque backdrop of trees from Bushy Park and a pleasant arrangement of neighbouring residential streets. Most of the area is residential with a predominantly Victorian and Edwardian character of uniform semi-detached homes in avenues of mature trees. There are also many pockets of modern designed terraced housing and flats arranged in courts and parklands with a high standard of landscape quality."*

## 4.0 LANDSCAPE AND VISUAL APPRAISAL OF THE SITE

### Site Appraisal

- 4.1 The Site is illustrated on **Figure 2: Site Appraisal Plan**, and in **Site Appraisal Photographs A, B, C and D**.
- 4.2 The Site is 12.8 acres in size and of relatively regular shape, and is bound by roads and residential development on all sides.
- 4.3 It comprises predominantly formal playing fields and tennis courts, with a club house and several ancillary structures such as viewing seating, two vehicular accesses, associated parking and one designated pedestrian entrance.
- 4.4 All vegetation, with the exception of the amenity playing field grassland, is limited to intermittent tree and hedge or shrub planting along the perimeter of the Site and around the parking area. The Site is otherwise devoid of any noteworthy natural features.

### Visual Appraisal

- 4.5 The visual context of the Site and its surroundings is illustrated by **Site Context Photographs 1 - 4**, the locations of which are shown on **Figure 1: Landscape and Visual Context Plan**.
- 4.6 A visual appraisal of the Site and its environs was undertaken in February 2017, to determine the relationship of the Site with its surroundings, and the visibility of the Site within the wider landscape and townscape.
- 4.7 The visibility of any site is predominantly influenced by its landform and the extent and type of vegetation cover and built elements within a site and the surrounding landscape or townscape. The combination of the flat topography and immediately surrounding existing residential development result in the Site being visible from only the immediate vicinity, and therefore the visual appraisal has been undertaken from publicly accessible viewpoints from the roads immediately surrounding the Site, to determine the approximate extent from which the Site is visible from the eye of a person standing on the ground. There is, in most visual appraisals, a continuum of degrees of visibility ranging from no view of a site to full, open views. To indicate the degree of visibility of the Site from the surrounding locality, three categories of visibility have been used in this assessment:
  - a) Open view: A clear view of a significant proportion of the Site within the wider landscape or townscape.

- b) Partial view: A view of part of the Site or a filtered view of the Site, or a distant view in which the Site is perceived as a small part of the view; and
- c) Truncated / No view: Views towards the Site are curtailed by visual barriers, such as intervening topography, vegetation or built forms.

- 4.8 **Site Context Photographs Nos. 1 – 4** illustrate a representative selection of views of the Site from the immediate surrounding area, the locations for which are identified on **Figure 1: Landscape and Visual Context Plan**.
- 4.9 Much of the boundary of the Site is enclosed by close board timber fencing or built form (71% of the length of the boundary), such that views into the Site from ground level are extremely limited, being predominantly truncated, and are limited to partial views or glimpses through lengths of the boundary with railings and hedging, or railing and trees, even in winter, when the vegetation is devoid of foliage.
- 4.10 **Site Context Photographs 1 and 2** demonstrate the enclosure provided by the boundary fencing and in some locations adjoining residential development, resulting in limited (truncated) views and limited appreciation of the playing fields, from the immediately surrounding roads and footways as experienced by pedestrians and motorists.
- 4.11 **Site Context Photographs 3 and 4** demonstrate the brief lengths of more open boundary treatment, of railings and boundary vegetation. Where the boundary treatment is more open, there are partial views of the playing fields seen through the railings and boundary vegetation.
- 4.12 With the exception of from the first and upper floors of immediately surrounding residential development, there are no open views into the playing fields, and no available views of the whole Site.

## 5.0 CONSIDERATION OF POTENTIAL ALLOCATION AS LOCAL GREEN SPACE

### Consideration of Policy Context

- 5.1 In assessing the Site against the policy requirements for a Local Green Space as set out in the NPPF, the NPPF states that the designation should only be used:
- *where the green space is in reasonably close proximity to the community it serves;*
  - *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
  - *where the green area concerned is local in character and is not an extensive tract of land."*
- 5.2 With regard to the proximity to the community it serves, firstly, the Site is not publicly accessible, and is used by several sports clubs with the express consent of the landowner and on a temporary basis. The Site is therefore used by only relatively small sector of the local community, for limited periods of time on a temporary basis, therefore, whilst surrounded by local residents, it currently only serves, and is accessible to, a very small part of the local community and not permanently, and is therefore limited in the extent to which it "serves" the community.
- 5.3 With regard to being "demonstrably special", it is valued insofar as it is an open space within the suburban context of the surrounding settlement, nothing more.
- 5.4 However, as demonstrated by the Landscape and Visual Appraisal, the appreciation of that openness is very restricted, both by the lack of public accessibility, and by the enclosed nature of much of the boundary treatment.
- 5.5 In terms of its local significance, recreational value and amenity is very restricted.
- 5.6 Furthermore, comprising featureless amenity grassland, with no noteworthy landscape features, the Site has no attributes that contribute to "beauty".
- 5.7 Whilst it has been in private recreational use for many decades, this has always been in private, related use, which does not expressly constitute 'historical significance', particularly when compared with other parks and open spaces in the locality, such as the likes of Bushey Park, Hampton Court, Ham House and Richmond Park which demonstrate "historical significance" (although knowledgably these are of too greater extent to be 'Local Green Space'). There are

several buildings of Townscape Merit, on Udney Park Road and Teddington High Street, however these are not directly related to the Site. Therefore, it is apparent that the Site exhibits limited 'historical significance'.

- 5.8 The Site also exhibits very limited recognised aspects of tranquillity, being surrounded by roads and development on all sides, with no sense of remoteness, and influenced by suburban development on all sides, including noise, and lighting. It does provide some relief from the density of the surrounding suburban development, but this is not readily appreciated from much of the surrounding area. It is not utilised for informal recreation, as use is limited to those sports clubs that have the express consent by the landowner for use on a temporary basis, such that it would not be readily experienced as a green space providing relief from the sub-urban environment.
- 5.9 With regard to richness of its wildlife, the Site exhibits very limited habitat diversity or wildlife richness, being predominantly uniform amenity playing field grassland, with any limited habitat variety restricted to very narrow margins on the boundaries of the Site.
- 5.10 Therefore, the Site in its current condition and use, with its current level of accessibility, and lack of "beauty, historic significance, tranquillity and any richness in wildlife" only very partially meets the NPPF requirements for the designation of Local Green Space.
- 5.11 In considering the Site against the policy requirements for Local Green Space Designation, as set out in the Publication Version of the emerging London Borough of Richmond Upon Thames Local Plan, the criteria to be taken into account when defining Local Green Space is set out in Paragraph 5.2.10, and sets out that:
- *"The site is submitted by the local community;*
  - *There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;*
  - *The site is not land allocated for development within the Local Plan;*
  - *The site is local in character and is not an extensive tract of land;*
  - *Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves;*
  - *The Local Green Space is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;*
  - *The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means."*

- 5.12 Notably, the first three criteria are additional to the criteria set out in the NPPF, and are not specific to the character, use and function of Local Green Space, which is the general focus of the NPPF criteria. As set out in the first criteria, whilst the Site may have been submitted by two local groups (which may be considered as not representative of the wider community, as evidenced by the creation of the CIC which is supportive of the proposals for the site) for a Local Green Space designation, this is not necessarily a commendation per se for the designation of the Site as Local Green Space, as the NPPF sets out the type of characteristics that demonstrate being of local significance or special to a local community, for example because of its beauty, historic significance, recreational value (to that community), tranquillity or richness in its wildlife. It is more to do with seeking to stop any development of the Site from occurring.
- 5.13 With regard to the second and third criteria, whilst there is no current planning permission which once implemented would undermine the merit of a Local Green Space designation, and the land is not presently allocated for development, this does not relate to the merits of the Site in terms of its suitability for Local Green Space, with again regard to character, use and function.
- 5.14 The fourth, fifth and sixth criteria reflect the criteria for Local Green Space designation as set out in the NPPF, and as established above, the Site only very partially meets with the requirements for Local Green Space designation.
- 5.15 With regard to the final criteria, the Site is currently designated as "Other Open Land of Townscape Importance" as defined by Policy DM OS 3 of the adopted London Borough of Richmond Upon Thames Local Plan, and this policy is retained in the emerging Publication Version London Borough of Richmond Upon Thames Local Plan, as Policy LP 14: Other Open Land of Townscape Importance. This policy provides protection for the spatial character of the townscape of the borough, in particular to maintain predominantly open or natural areas, including areas that are of "value to local people for its presence and openness". Considering the current character, function and use of the Site, not what is proposed by the Quantum Group and the Teddington Sports Ground CIC in their representations to the Local Plan, this is an appropriate policy to afford protection of important open land within in areas of dense suburban development, and when considering the Site in the context of the criteria for Other Open Land of Townscape Importance, and the supporting text of the policy. Paragraph 4.1.8 of the adopted Local Plan sets out the criteria for Other Open Land of Townscape Importance as:
- *"Contribution to the local character and/or street scene, by virtue of its size, position and quality.*
  - *Value to local people for its presence and openness.*

- *Immediate or longer views into and out of the site, including from surrounding properties.*
- *Value for biodiversity and nature conservation.*

*Note that the criteria are qualitative and not all need to be met."*

5.16 Paragraph 5.3.4 sets out the criteria for Other Open Land of Townscape Importance, which in addition to the above includes the following criterion:

- *"Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure'."*

5.17 Importantly, to be designated Other Open Land of Townscape Importance, public access and recreational value are not required qualities, and therefore the Site is more compliant with the overall criteria for Other Open Land of Townscape Importance, as set out in both the adopted and the emerging Local Plan, than that for the designation of Local Green Space.

5.18 Of note is supporting text which sets out the purpose of Policy DM OS 3, and ways that such Other Open Land of Townscape Importance can be enhanced:

***4.1.9 The purpose of this policy is to safeguard this open land and ensure that it is not lost to other uses without good cause. Protecting and opening up views into and out of designated other open land is encouraged because of the contribution to the distinctive character of an area and the benefits to all. Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for social community or educational uses, it may be acceptable to re-distribute the open land within the site, providing that the new open area is equivalent or improved in terms of size, shape, location, quality and potential ecological value."***

5.19 Likewise, similar supporting text is set out in the emerging Local Plan, at paragraphs 5.3.1, 5.3.6 and 5.3.7, setting out that:

***"5.3.1 The purpose of this policy is to safeguard open land of local importance and ensure that it is not lost to other uses without good cause. Areas designated as Other Open Land of Townscape Importance (OOLTI) form an important part of the multi-functional network of Green Infrastructure and they can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. The designated areas are shown on the Proposals Map.***

***5.3.6 Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for community and social infrastructure including educational uses, it may be acceptable to re-distribute the designated open***



***land within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness.***

***5.3.7 Protecting and opening up views into and out of designated OOLTI is encouraged because of the contribution they can make to the distinctive character of an area and the benefits to all."***

- 5.20 With regard to the final criteria for Local Green Space, the existing character of the Site can be adequately and reasonably protected by both the existing adopted Policy DM OS 3 and the emerging Policy LP14 with regard to Other Open Land of Townscape Importance. Furthermore, as set out in Policy L 13 Paragraph, to be designated as Local Green Space, it must be demonstrated that a green or open space has special qualities and holds a particular significance and value to the community it serves. However, as set out above, the Site has limited special qualities, more aligned with its designation as Other Open Land of Townscape Importance, and is very limited in the extent to which it "serves" the community, and therefore the additional protection of a Local Green Space designation is neither appropriate nor necessary.

## 6.0 CONSIDERATION OF POTENTIAL ENHANCEMENTS TO THE SITE

6.1 As set out in the Representations to the Local Plan for the Site, made by Quantum Group and the Teddington Community Sports Ground CIC, the aspirations for the Site are to deliver enhanced sporting and community facilities, new public open space, and care-led accommodation for the elderly with publicly accessible healthcare services. The key benefits of which would be:

- Significant new public open space (gifted to the CIC as custodians of the Community) to enrich the life, health and wellbeing of residents and visitors;
- Enhanced play and sporting opportunities for all ages and abilities, including provision of a 3G pitch;
- Space for local groups and community activities;
- Modern, multi-use facilities to meet the needs of local clubs;
- Affordable housing solutions for the elderly population;
- Employment opportunities;
- Enhanced biodiversity and habitat creation; and
- A sustainable legacy for future generations.

6.2 In addition, the proposals would increase the appreciation of the openness of the Site, with increased views into and out of the Site, achieved through the replacement of much of the close board fencing with open railings, to increase the visual permeability of the Site. The increase of availability of views from within the Site would be delivered through the provision of public access.

### *Contribution to Other Open Land of Townscape Importance*

6.3 As demonstrated, the existing character of the Site can be adequately and reasonably protected by both the existing adopted Policy DM OS 3 and the emerging Policy LP 14, with regard to Other Open Land of Townscape Importance, and that additional protection of a Local Green Space designation is neither appropriate nor necessary.

6.4 In this context, on consideration of the proposals for the Site, as promoted by the Quantum Group and the Teddington Sports Ground CIC, as illustrated on the attached plans, the proposals offer real enhancements to the Other Open Land of Townscape Importance, in accordance with the policy objectives set out in both the existing adopted Policy DM OS3 and the emerging Policy LP 14.

- 6.5 Whilst the proposals would result in a small reduction in overall open space, the comprehensive approach to the redevelopment of the Site would result in an acceptable re-distribution of open land within the Site, such that there would be a significant increase in publicly accessible open land, in terms of publicly accessible informal and formal open space and sports pitch provision, to be enjoyed by immediately adjoining residents and visitors.
- 6.6 The accessible open space would also be of an improved quality; through the range of function and use, that is through the provision of informal public open space, a Multi-Use Games Area (MUGA), children's play area and higher quality pitch provision allowing for greater flexibility and intensity of use; through creation of more natural areas associated with the informal public open space with enhanced biodiversity and nature conservation value; and with an improvement to the landscape and visual character, through tree planting and landscape proposals to introduce variety and interest.
- 6.7 The proposals for the Site would result in the Site making a greater positive contribution to the surrounding townscape; providing an enhancement to the local character and street scene through the increased visibility of the Site, and greater diversity in character across the Site; and continuing to perform its function as a valued open space within the built up area, with a greater appreciation of the open nature of the Site from surrounding residents.
- 6.8 The proposals for the Site would also result in the Site making a greater contribution to the multi-functional network of surrounding Green Infrastructure, with increased access and permeability across the Site creating linkages with the surrounding area.
- 6.9 The proposals for the Site would therefore result in an "enhancement of the openness and character of the open land", and would "open up views into and out of the open land", as encouraged by both adopted Policy DM OS 3 and emerging Policy LP 14.
- 6.10 The proposals for the Site would increase the attributes of the Site that contribute to its designation as Other Open Land of Townscape Importance in terms of the criteria set out in Paragraph 4.1.8 of adopted Policy DM OS 3, as follows:
- *"Contribution to the local character and/or street scene, by virtue of its size, position and quality.*
  - *Value to local people for its presence and openness.*
  - *Immediate or longer views into and out of the site, including from surrounding properties.*
  - *Value for biodiversity and nature conservation."*
- 6.11 Furthermore, the proposals for the Site would also increase the contribution that the Site makes to the network of green spaces and green infrastructure, with regard to the additional criterion, in addition to the above, set out in Paragraph 5.3.4 of emerging Policy LP 14:

- ***“Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 ‘Green Infrastructure’.”***

6.12 The proposals for the Site would therefore not only “not harm the character and openness of the open land”, in accordance with the requirements set out in both adopted Policy DM OS 3 (Point 3) and emerging Policy LP14 (Point C), but would enhance the character and openness of the open land, resulting in the Site making a greater contribution to the function and objectives of designated Other Open Land of Townscape Importance.

*Contribution to Local Green Space*

6.13 As demonstrated, the Site in its current condition and use, with its current level of accessibility, and lack of “beauty, historic significance, tranquillity and any richness in wildlife” only very partially meets the NPPF Paragraph 78 requirements for the designation of Local Green Space, as set out below:

- ***where the green space is in reasonably close proximity to the community it serves;***
- ***where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and***
- ***where the green area concerned is local in character and is not an extensive tract of land.”***

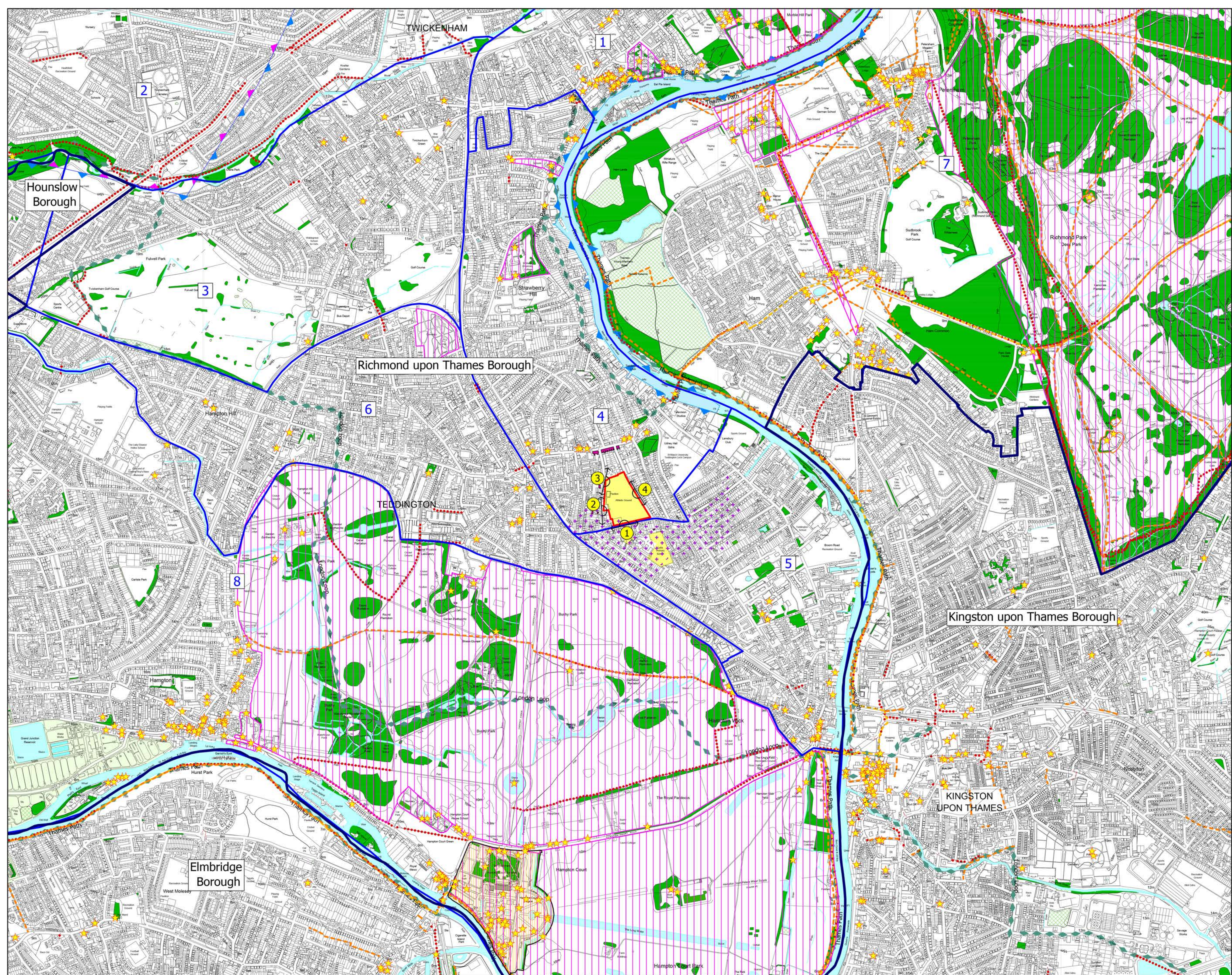
6.14 Likewise, with regard to fourth, fifth and sixth criteria of Paragraph 5.2.10 of emerging Policy LP 13, addressing Local Green Space, the Site only very partially meets with the requirements for Local Green Space designation, as set out below:

- ***“... The site is local in character and is not an extensive tract of land;***
- ***Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves;***
- ***The Local Green Space is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;... ”***

6.15 The Site has limited special qualities, more aligned with its designation as Other Open Land of Townscape Importance, and is very limited in the extent to which it “serves” the community, and therefore the additional protection of a Local Green Space designation is neither appropriate nor necessary.

- 6.16 However, should the Site be designated as Local Green Space, the proposals for the Site would provide significant benefits, such that the Site would provide a wide range of accessible informal and formal public open space, immediately adjoining the local community that it would then serve; with an increase in local significance by creating an attractive accessible green space of greater beauty, recreational value and richness of wildlife.
- 6.17 Therefore, the proposals for the Site, as promoted by the Quantum Group and the Teddington Community Sports Ground CIC, if implemented, would be consistent with the allocation of the Site as a Local Green Space designation, should the Site be designated as such, and would therefore not conflict with the second criteria of Paragraph 5.2.10 of emerging Policy LP 13. The proposals for the Site would therefore contribute to the "very special circumstances where benefits can be demonstrated to significantly outweigh the harm", as set out in Paragraph 5.2.9 of Policy LP 13 of the emerging Local Plan.





The scaling of this drawing cannot be assured.

Revision \_\_\_\_\_ Date \_\_\_\_\_ Dm Ckd \_\_\_\_\_

### LEGEND

- Site Boundary
- Existing Woodlands, Copses and Tree Belts ^
- Existing Scrub ^
- Existing Water Courses and Features ^
- Contours/Spot Heights (Metres AOD) ^
- Local Planning Authority Boundary ^
- Public Rights of Way \*/##
- Sustrans Cycle Route +
- Cycle Route ++
- National Trail/Long Distance Walk \*/##
- Listed Buildings ~
- Registered Parks and Gardens ~
- Scheduled Monument ~
- Other Open Land of Townscape Importance \*
- Area Poorly Provided with Public Open Space \*
- Buildings of Townscape Merit \*
- National Character Area Profile #  
Area 111, Northern Thames Basin
- National Character Area Profile #  
Area 115, Thames Valley

London Borough of Richmond Upon Thames  
Landscape Character Areas

- 1 Twickenham & St Margaret's
- 2 Whitton & Heatfield
- 3 West Twickenham & Fulwell
- 4 Strawberry Hill & Teddington East
- 5 Hampton Hill & South Teddington
- 6 Hampton Hill & Teddington West
- 7 Ham, Petersham & Richmond Park
- 8 Hampton, Bushy Park & Hampton Court

Location of Photographic Viewpoints  
(Site Context Photographs 1-4)

Source:

- OS Mapping
- Natural England GIS Data Set
- Historic England National Monument Record GIS Data Set
- Surrey County Council ProRIS GIS Data
- Sustrans National Cycle Network GIS Data
- Department of Transport (DoT) GIS Cycle Network Data
- Department for Communities and Local Government GIS Data
- OS Explorer Map 1:25,000 Scale
- London Borough of Richmond Upon Thames Local Plan - Proposals Map, Adopted July 2015

Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

## FIGURE 1

Project  
Teddington Athletic Ground

Drawing Title  
Site Context Plan

Date  
08.02.2017

Scale  
1:10,000 @A1  
1:20,000 @A3

Project No  
25615

Drawing No  
L1

Drawn by  
MK

Check by

Revision

Barton Willmore


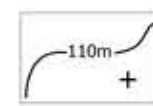

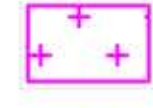

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LEGEND

-  Site Boundary
-  Contours/Spot Heights (Metres AOD) ^
-  Listed Buildings ~
-  Other Open Land of Townscape Importance \*
-  Location of Photographic Viewpoints (Site Context Photographs A-D)

Sources:  
^ OS Mapping  
~ Historic England National Monument Record GIS Data Set  
\*\* London Borough of Richmond Upon Thames Local Plan - Proposals Map, Adopted July 2015


Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

FIGURE 2

Project  
Teddington Athletic Ground

Drawing Title  
Site Appraisal Plan

Date	Scale	Drawn by	Check by
08.02.2017	1:2,000 @A2 NTS @A3	MK	
Project No	Drawing No	Revision	
25615	L2	-	





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Site plan showing ownership boundary and indicative use zones to accompany Quantum Group's Publication Consultation representation form

15th February 2017

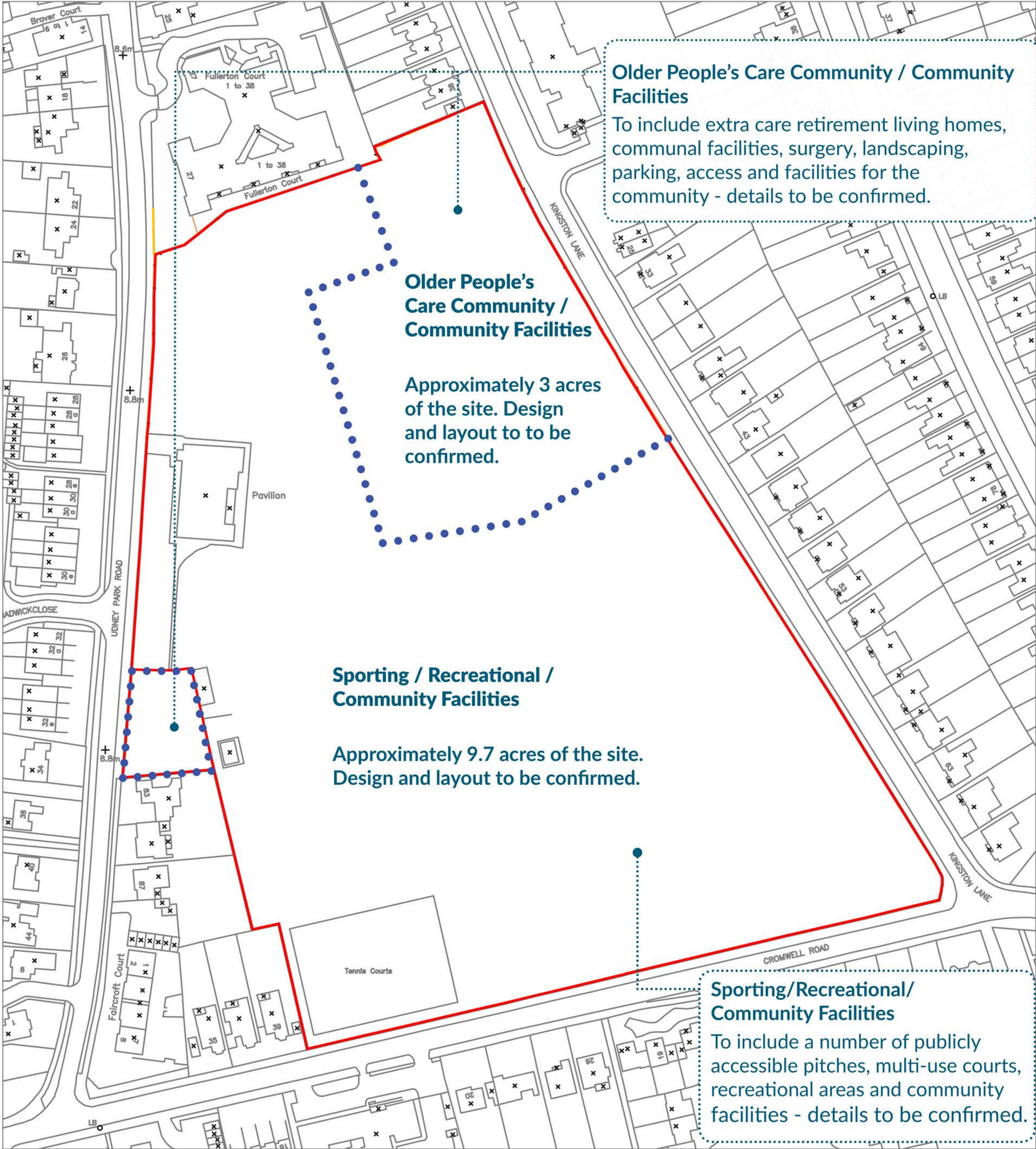


FIGURE 3





FIGURE 4 : Illustrative Proposals

Former Imperial College Private Ground, Teddington.

Illustrative masterplan layout.

(One but not the only way development may be proposed - illustrative purposes only)





SITE APPRAISAL PHOTOGRAPH A:



SITE APPRAISAL PHOTOGRAPH B:



SITE APPRAISAL PHOTOGRAPH C:



SITE APPRAISAL PHOTOGRAPH D:

TEDDINGTON  
ATHLETIC GROUND

SITE APPRAISAL  
PHOTOGRAPHS: A - D

RECOMMENDED VIEWING  
DISTANCE: 20CM @A1

DATE TAKEN: FEB 2017

PROJECT NUMBER: 25615

**BARTON  
WILLMORE**





SITE CONTEXT PHOTOGRAPH 1:



SITE CONTEXT PHOTOGRAPH 2:



SITE CONTEXT PHOTOGRAPH 3:



SITE CONTEXT PHOTOGRAPH 4:

TEDDINGTON  
ATHLETIC GROUND

SITE CONTEXT  
PHOTOGRAPHS: 1 - 4

RECOMMENDED VIEWING  
DISTANCE: 20CM @A1

DATE TAKEN: FEB 2017

PROJECT NUMBER: 25615

**BARTON  
WILLMORE**





# GERALDEVE

Planning Policy  
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Tel. 020 7493 3338  
[www.geraldevve.com](http://www.geraldevve.com)

19 August 2016

**Our ref: NTH/KWEW/SRO/AKG/J7699**

**Your ref:**

Dear Sirs

## **Local Plan Review Pre-Publication Consultation**

We write on behalf of our client, Reselton Properties Limited, to submit representations on the Pre-Publication consultation of the Local Plan, which is available for consultation until 19 August 2016.

Our client has recently completed the purchase of the Stag Brewery site in Mortlake ('the site') and is currently progressing with plans to comprehensively redevelop the site to deliver a high quality mixed use scheme. Pre-application discussions are ongoing with The London Borough of Richmond Upon Thames, ('LBRuT') Council officers and other relevant bodies, with a view to submitting a planning application in 2017. The plans for the site are being developed with reference to the adopted Stag Brewery Planning Brief SPD (July 2011).

It is within this context that we submit representations on the draft Local Plan. Our comments largely centre around the Stag Brewery site allocation (SA 23), which we set out below. We also set out comment on more general draft Local Plan policies which will affect the detail of the scheme. Suggested amendments to policy wording are presented in tracked changes.

### **Draft Site Allocation 23 – Stag Brewery, Lower Richmond Road, Mortlake**

We support the inclusion of the Stag Brewery site as an allocated mixed-use site in the draft Local Plan. We do, however, have some comments on the draft policy and supporting wording:

#### *(1) Policy requirement for the provision of an on-site new 6-form entry secondary school*

Discussions are ongoing between our client, LBRuT's and the Education Funding Agency team regarding the requirement for a new secondary school on the Stag Brewery site. While Reselton Properties Limited would support the use of the site for the incorporation of an education facility as part of a comprehensive redevelopment scheme, the implications of including a new 6-form entry secondary school will need to be fully explored to ensure the site offers the most suitable location and solution to meet any identified need under all circumstances. We therefore consider that the policy wording should be amended as follows:

**"...The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required sought..."**

In addition, we consider the third supporting bullet to the policy should be amended as follows:

**“There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area, as set out in the Council’s School Place Planning Strategy. Therefore, the Council ~~expects~~ will seek any redevelopment proposal to allow for the provision of this school.”**

*(2) Policy requirement for the retention and upgrading of the playing field*

Our client’s ambitions for the site will include the provision of new open space including the re-provision of a new sports field on the site of the current area of open space. However, it is important that the policy allows for flexible re-provision of a sports pitch in order that the full range of planning benefits can be achieved as part of a comprehensive redevelopment scheme. We therefore propose that the following text for Site Allocation SA 23 is amended as follows:

**“.... river-related uses as well as sports and leisure uses, including the ~~retention re-provision and upgrading of the playing field.~~ ....”**

*(3) Employment uses*

The comprehensive redevelopment proposals for the site will include employment uses. These may include lower cost units for small businesses, creative industries and green technology uses as referred to in the draft wording. At this stage, flexibility must be incorporated within the supporting text wording to assess the correct balance, proportion and mix of employment uses. We therefore propose that the following supporting text to the policy should be amended as follows:

**“.... Therefore, it is expected that this site will provide a ~~substantial~~ mix of employment uses (B uses) ~~including~~ which may include lower cost units suitable for small businesses.....”**

*(4) Planning obligations*

The supporting text to Policy SA23 makes reference to the provision of a secondary school and affordable housing. An additional bullet point should be incorporated dealing with planning obligations in a holistic sense, acknowledging that the overall planning obligation and contribution package will be subject to viability. This is also important in the context of the adopted Development Brief requirement (for a primary school) and the Council’s current requirement (for a secondary school). We suggest the following is added as an additional bullet point:

- **The Council recognises that the priority of infrastructure requirements may affect other planning obligations and contributions sought, including affordable housing. The basis of this will be treated on its merits, and subject to detailed viability appraisal.**

## **Other Borough-Wide Policies**

We set out below comments on the more general policies covering development within the borough. Where we have suggested changes to draft Policy wording, we have included these as tracked changes to the text.

### ***New Policy LP 8 Amenity and Living Conditions***

We support, in principle, the general aim of this draft policy to secure high quality development to protect the amenity and living conditions of new and existing residents in the borough. However, in terms of separation distances, we consider that criterion 2 of the draft Policy is overly onerous and does not take account of site specific circumstances and individual design characteristics that may be able to achieve adequate privacy levels for existing and new residents. We would draw attention to para 2.3.6 of the Mayor's Housing SPG which encourages flexibility when applying minimum separation distance standards:

**“Designers should consider the position and aspect of habitable rooms, gardens and balconies, and avoid windows facing each other where privacy distances are tight. In the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). These can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density.”**

Innovative architectural methods should be encouraged which can protect privacy whilst at the same time increasing housing density and boosting housing provision. We therefore consider that criterion 2 of draft Policy LP 8 should be amended to read:

**“~~ensure that appropriate~~ ~~ere is a minimum distances of 20 metres between main facing~~ windows of habitable rooms (this includes living rooms, bedrooms and kitchens with a floor area of 13sqm or more) are achieved to ensure and reasonable visual privacy for occupants of new development and for occupants of existing properties affected by new development;”**

#### ***New Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination***

Part F under 'Land Contamination' suggests that all land will require remediation where development is to be brought forward. The general principle of this policy is supported but recognition should be made to take account of the fact that not all land will require remediation work. Accordingly, it is proposed that the policy be worded as follows:

**“The Council promotes, where necessary, the remediation of contaminated land where development comes forward.”**

#### ***New Policy LP 11 Subterranean development and basements***

This policy is considered to relate wholly to existing residential properties and is not considered to be relevant in the context of a major comprehensive redevelopment masterplan. As a result, it is considered that the policy wording should be amended for the avoidance of doubt as follows:

**“A. In the context of existing residential properties, the Council will resist subterranean and basement development of more than one storey below the existing ground level to existing residential properties or those which were previously in residential use.”**

#### ***New Policy LP 16 Trees and Landscape***



We recognise that importance of retaining and enhancing trees and vegetation within new build developments. Part 1 of the draft Policy does recognise that in some instances some low quality, dead trees can be removed and this recognition is welcome.

However, Part 2 of the draft Policy allows no flexibility for instances where works are required to existing trees which contribute to the local landscape. It is appreciated that the Council will want to ensure maximum tree protection measures are in place for new development, but it should be recognised that some developments may require the removal of trees that are considered to be of townscape or amenity value where this results in significantly greater planning benefits. Flexibility should be built in to the Policy to allow the Council to determine the scheme on its overall planning merits. Mitigation measures can then be secured through parts 3 and 4 of the Policy.

In order to incorporate greater flexibility, we consider that part 2 of the draft Policy should be amended to state:

**“resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value, unless clear planning benefits can be demonstrated. The Council will require that site design or layout ensures a harmonious relationship between trees and their surroundings and will resist development which will be likely to result in pressure to significantly prune or remove trees.”**

#### ***New Policy LP 17 Green Roofs and Walls***

We consider that a target of using at least 70% of roof plate areas as green roofs is onerous and could have scheme implications in terms of viability and the ability for roof areas to deliver other scheme requirements, such as plant. We do, however, welcome the flexibility that is incorporated into policy in allowing the target to be considered on a site by site basis.

Where applicants cannot provide green roofs, the draft Policy states that the Council **“will normally expect a green wall to be incorporated”**. Green walls are not always suitable (for example, where the orientation is not correct) and may not always provide sustainable and ecological benefits. In addition, the walls can be very expensive to maintain. The draft Policy seeks to maximise sustainable and ecological measures where feasible and we do not consider that the blanket provision of green walls will secure this aim. We consider that the draft Policy should be amended to seek a range of sustainable design methods, and consider that it would be more appropriate for green roofs (and other methods such as the provision of parks, ponds etc.) to be covered within the supporting policy text. Accordingly, we consider that the draft Policy should be amended as follows:

**“Green roofs should be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact. The aim should be to use at least 70% of any potential roof plate area as a green roof.**

**The onus is on an applicant to provide evidence and justification if a green roof cannot be incorporated. The Council will normally expect other sustainable design methods to enhance biodiversity and provide sustainability benefits a green wall to be incorporated where it has been demonstrated that a green roof is not feasible.**

**The use of green roofs and walls is encouraged and supported in smaller developments, renovations, conversions and extensions.”**

We would also note that in the supporting text to the draft Policy, it states that “**green roofs are not roof terraces**”. We consider that there is an opportunity for green roofs and roof terraces to be incorporated to provide attractive amenity spaces that provide a green environment for residents whilst at the same time assisting in meeting sustainability and biodiversity aims. We consider that the supporting text should be amended to reflect this opportunity.

### ***New Policy LP 18 River Corridors***

Our client's aim for the Stag Brewery site is to deliver a scheme which connects to and enhances the river, providing an attractive setting for residents, visitors and river-users.

However, we consider that part C of draft Policy LP 18 is overly onerous and does not take into account any land ownership issues that may limit the ability of a developer to deliver a scheme which can provide a public riverside walk. In addition, flood defence requirements may limit the ability for riverside developments to provide public walkways. Whilst we support the aim of the Policy in principle, we consider that the wording should be amended to provide some level of flexibility. We consider that Part C of the policy should read:

**“All development proposals adjoining the River Thames are required to provide a public riverside walk where feasible, including for pedestrians and cyclists, which will contribute to the overarching aim of providing a continuous publicly accessible riverside walk.”**

The Stag Brewery site is currently not in use by river-dependent uses and facilities. Its proposed use, a mixed use scheme delivering housing, employment, education provision, retail and amenity space, will not, at this stage, deliver mainly river-dependent uses or facilities. However, whilst this use is not specifically river-related, it will deliver significant planning benefit to the local community and the wider borough. Therefore, we consider that Part D Sections 2 and 3 of the draft Policy should acknowledge that riverside sites can present opportunities to deliver uses which are not river-dependent and which deliver significant planning benefits. We consider that the policy wording should be amended to read:

**“2. Where appropriate, ensuring development on sites along the river is functionally related to the river and includes river-dependent or river-related uses where possible, including gardens which are designed to embrace and enhance the river, and be sensitive to its ecology;**

**3. requiring an assessment of the effect of the proposed development of the operation of existing river-dependent uses or riverside gardens on the site and their associated facilities on- and off-site; or where appropriate requiring an assessment of the potential of the site for river-dependent uses and facilities if there are none existing;”**

### ***New Policy LP 22 Sustainable Design and Construction***

It is recognised that new development should target a 35% reduction in carbon emissions. However, we consider that draft Policy LP 22 should recognise more clearly instances where a proposed development scheme will not be able to meet the stated 35% reduction in carbon dioxide

emissions. This is especially the case for development in LBRuT, where the Council does not currently operate a carbon off-setting scheme (although we do note that para 6.3.12 in the policy supporting text acknowledges that this method could in theory be used should it not be feasible to achieve the required carbon dioxide reductions through on-site measures). We would urge LBRuT to consider a carbon off-setting scheme, as this is one of the Mayor's priorities.

As the Council does not currently operate a carbon off-setting scheme, policy wording should be made more flexible to recognise that the 35% reduction is a target for schemes. This approach would be in line with the Mayor's 'Sustainable Design and Construction SPG' (April, 2014) which states that the Mayor recognises **"that some building types will find it harder to achieve the 35% target without a contribution to a local off-set fund"**. In these instances, **"Developers will continue to need to undertake sufficient calculations to demonstrate compliance with London Plan policy 5.2. Should particular building types struggle to meet the target on-site, developers will need to provide the Mayor with sufficient evidence to demonstrate that this is the case"**.

Therefore it is suggested that Part B Sections 1 and 2 of draft Policy LP 22 should state:

**"1. All new residential buildings should ~~achieve target~~ a 35% reduction.**

**2. All major non-residential buildings should ~~achieve target~~ a 35% reduction. If this 35% reduction target is not feasible, justification should be provided".**

#### ***New Policy LP 36 Affordable Housing***

Draft Policy LP 36 relates to affordable housing provision. Part C confirms that the maximum reasonable amount will be sought from mixed-use schemes, having regard to economic viability, site costs, other planning benefits etc.

Part D of the draft policy relates to economic viability and the requirement for development appraisals to demonstrate that the maximum reasonable provision is being made. It states that, in most circumstances, the Existing Use Value (EUV) approach to assessing benchmark land values will be used.

This approach ignores the market, is inconsistent with PPG guidelines and is in conflict with paragraph 173 of the NPPF which refers to providing competitive returns to a willing landowners and a willing developer to enable development to be deliverable.

PPG guidance states that Site Value should:

- a) Reflect policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge;
- b) Provide a competitive return to willing developers and land owners (including equity resulting from those wanting to build their own homes); and
- c) Be informed by comparable, market-based evidence wherever possible. Where transacted bids are significantly above the market norm, they should not be used as part of this exercise.

The competitive return to the willing seller of land is set out in all three documents (NPPF, PPG and RICS GN) and relates to the market and what the market considers will be the incentive for the land owner to release the land for development. There are a number of market signals of which planning policy is just one.

The NPPF states that development should “provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable”.

PPG states “A competitive return for a landowner is the price at which a reasonable land owner would be willing to sell their land for the development. The price will need to provide an incentive for the land owner to sell in comparison with the other options available. Those options may include the current use value of the land or its value for a realistic alternative use that complies with planning policy.”

The idea that a willing landowner would only have regard to the EUV of its land is flawed and too singular an approach. A willing seller will not only have regard to the EUV of their land, but they will also have regard to its value for a range of alternative uses (alternative use value / AUV), each carrying a unique set of risks, as well as the value that has been achieved by other landowners in the market for comparable development sites. If their site already benefits from a planning permission or allocation this will also be a consideration. As set out in the RICS GN it is only within this context that an appropriate judgement to what a competitive return for a landowner is can be made.

On this basis, the relevant section of draft Policy LP 36 (which refers to use of EUV) should be deleted from the policy as it does not accord with national policy and guidance, and does not have regard to the market or allow for competitive returns.

### ***New Policy LP 45 Parking Standards and Servicing (and associated Appendix 3)***

Draft Policy LP 45 requires parking facilities in line with those standards set out in Appendix 3. Appendix 3 has not been published for consultation and we understand that the Council is in the process of developing research to inform the review of local parking standards. The level of parking provision is a major factor in the design of schemes and these standards must be made available for public consultation. Therefore, the standards must be fully developed prior to the next consultation of the emerging Local Plan, in order to allow interested parties to comment appropriately.

In the absence of revised parking standards, we set out below our comments on the Council's existing parking standards and our suggestions for the direction that this policy should take.

The Council's existing parking standards are stringent and no flexibility is provided to take account of site specific characteristics. We consider that this approach is incorrect and not in accordance with national, regional, or indeed local ambitions to move towards more sustainable transport solutions. The National Planning Policy Framework ('NPPF') sets out that a presumption in favour of sustainable development “**should be seen as a golden thread running through both plan-making and decision-taking**” (para 14). One of the three components of sustainable development is environmental, where development should, amongst other aims “**minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy**” (para 7). Policy 6.1 of the London Plan sets out a strategic approach for the Mayor to

encourage travel methods that **“reduce the need to travel, especially by car”**. Draft LBRuT Emerging Local Plan Policy LP 44 is generally in line with this aim, setting out that the Council will **“promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion and air pollution”**.

The current standards are overly prescriptive and are likely to lead to the provision of more parking than is likely to be required. This will have an impact on the existing community through the encouragement of increased traffic congestion and noise and impacts on noise and air quality. This is in conflict with the aims of the NPPF, the London Plan and emerging draft Local Plan Policy LP 44.

Instead of applying rigid parking standards, we consider that policy should be flexible to allow decision-makers to consider the proposed transport strategies of schemes as a whole. This is in line with the NPPF which, at paragraph 39, states that local authorities should take into account a number of factors when setting local parking standards, including accessibility, the type, mix and use of development, opportunities for public transport, local car ownership levels and the overall need to reduce the use of high-emission vehicles. The London Plan also advocates this approach. Policy 6.1 sets out that the parking standards set out in Table 6.2 should be used by boroughs to set **maximum** car parking standards. At present, the LBRuT parking standards are more onerous than London Plan standards. Therefore, in order to be in accordance with the London Plan, LBRuT should work towards parking standards being set as maximum, with flexibility to take into account site specific circumstances and opportunities to reduce car ownership.

It is recognised that development will generate a need for transport infrastructure, which may well include car parking provision. We consider that policy should incorporate scope to consider where reduced parking provision can be supported by appropriate management strategies to ensure that there is not an unacceptable impact on on-street parking. This would include the use of car clubs / pool cars, car sharing, improved public transport and enhanced walking and cycling facilities. Parking impact can also be mitigated through extended CPZ arrangements. The provision of appropriate mixed use development can also reduce the need for long distance trips, especially by private car.

We would be grateful if you could consider these representations when developing the Publication version of the Emerging Local Plan and keep us informed of any consultation events. If you would like to discuss these representations in greater detail, please contact Neil Henderson (020 7333 6377) or Kevin Watson (020 7333 6388) of this office.

Yours faithfully



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Cc Guy Duckworth, Dartmouth Capital Advisors

### ***New Policy LP 45 Parking Standards and Servicing (and associated Appendix 3)***

Since the submission of our last representations, the Council has published its proposed parking standards.

Although we welcome that, for a variety of land uses, the parking standards outlined in the Draft Local Plan have been aligned with standards set out in the London Plan, it is noted that the Council's proposed residential parking standards conflict with the adopted London Plan policies. Whilst the London Plan encourages the provision of low levels of parking (albeit in locations with good accessibility to public transport services), the Council's standards encourage the provision of parking towards the maximum permitted level (albeit in areas with poor accessibility to public transport services), which allow for a far greater provision of parking compared to the London Plan maximum requirements, as set out as follows:

<b>Residential Unit Type</b>	<b>LBRuT Proposed Parking Standards</b>	<b>London Plan Adopted <u>Maximum</u> Parking Standards</b>
1-2 bedrooms	1 space	Less than 1 space per unit
3+ bedrooms	2 spaces	Up to 1.5 spaces per unit (for 3 beds), up to 2 spaces for 5 beds
Registered Provider housing (PTAL 0-3)	1 space per dwelling	Not separated from standard residential

With respect of non-commercial uses, we would also note that the parking standards as set out within Appendix 3 are in excess of those set by the London Plan.

Moreover, the new proposed parking standards are based on evidence provided within the 'Research to Support the London Borough of Richmond-upon-Thames' Review of the Local Parking Standards' report prepared by AECOM (August 2016). This report found that more generous standards resulted in higher car ownership levels, in line with TfL's research. It should be noted here that the average car ownership level within the borough stands at 1.06 vehicles per dwelling, according to the report. Whilst the parking standards are based on this research report the recommendations do not appear to tie in with the car ownerships and some parking utilisations e.g. the report reviewed the parking utilisation at the residential development of Wadham Mews, which provides a parking ratio of 0.89 spaces per dwelling. The report suggested that the maximum parking accumulation at this development was 85%. This appears to suggest that a considerably lower parking provision than set out in the new standards still overprovided parking by 25%. Therefore, it is considered that the parking standards need to be flexible enough to address areas of high public transport accessibility, low car ownership and the existence of Controlled Parking Zones.

The policy requirement may not reflect the actual need of the development taking into consideration predicted parking need generated from the development and potential schemes to encourage more sustainable modes of travel such as through the use of Travel Plans, car clubs, public transport enhancements etc. There is a danger that the adoption of higher parking standards can create a number of consequences including increased pressure on the highway networks, poor public realm



Tanja El Sanadidy

Enc: Appeal Decision (ref. APP/L5810/W/16/3143164), 39 Second Cross  
Road, Twickenham, TW2 5QY;  
Appeal Decision (ref. APP/L5810/W/16/3148614), 11 Tayben Avenue,  
Twickenham, Richmond upon Thames, TW2 7RA



## Appeal Decision

Site visit made on 18 April 2016

**by Beverley Wilders BA (Hons) PgDurp MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Decision date: 12 July 2016**

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**Appeal Ref: APP/L5810/W/16/3143164**

**39 Second Cross Road, Twickenham, Richmond upon Thames TW2 5QY**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
  - The appeal is made by Mr Anthony Bianchi against the decision of the Council of the London Borough of Richmond-upon-Thames.
  - The application Ref 15/1619/FUL, dated 16 April 2015, was refused by notice dated 23 October 2015.
  - The development proposed is a new 2 bed house.
- 

### Decision

1. The appeal is dismissed.

### Procedural Matter

2. Following my site visit the Court of Appeal issued its judgement in the case of the Secretary of State for Communities and Local Government v West Berkshire District Council & Reading Borough Council C1/2015/2559; [2016] EWCA Civ 441. I therefore sought the further views of the main parties as to the relevance of this judgement and have taken into account all responses received by the appropriate deadline in determining the appeal.

### Main Issues

3. The main issues are:
  - The effect of the proposal on the living conditions of occupiers of nearby residential properties having regard to outlook;
  - Whether the proposal would preserve or enhance the character or appearance of the Twickenham Green Conservation Area (CA) in which the site is located, including its effect on existing trees;
  - Whether or not the proposal makes adequate provision for vehicle and cycle parking and the effect of the proposal on pedestrian and highway safety having regard to the adequacy of turning facilities;
  - Whether or not the proposal would make adequate provision for affordable housing.

## **Reasons**

4. The appeal site comprises part of the rear garden of the dwelling at 39 Second Cross Road. The rear garden of 27 Second Cross Road, the adjacent property is located to one side of the appeal site with the access road to Chilvers Close located to the other. The dwelling at 22b Chestnut Road is on the opposite side of the access road with properties on Chilvers Close to the rear of the site.

### *Living conditions*

5. The proposed two storey dwelling is located very close to the boundaries of the site adjacent to the garden of No 27 and the access road to Chilvers Close. Its height and position relative to the rear garden of No 27 means that it would have an overbearing impact on and significantly adversely affect the outlook from the garden. There are two large trees in the rear garden of No 27 close to the site of the proposed house. Whilst these reduce the outlook from the garden of No 27 towards the appeal site, the outlook from the garden would be further diminished and materially harmed by the proposal. I do not consider that the proposed dwelling would have a significant adverse effect on the outlook from other nearby properties including 22b Chestnut Road. This is having regard to the relative distance between the proposal and these properties.
6. Taking the above matters into consideration, I conclude that the proposal would have a significant adverse effect on the living conditions of the occupiers of 27 Second Cross Road having regard to outlook. The proposal is therefore contrary to Policy DM DC 5 of the London Borough of Richmond upon Thames Local Development Framework Development Management Plan 2011 (DMP), to relevant paragraphs of the National Planning Policy Framework (the Framework) and to guidance contained within the Supplementary Planning Documents relating to Residential Development Standards 2010 (RDS) and Small and Medium Housing Sites 2006 (SMHS). These policies and guidance seek, amongst other things, to protect adjoining properties from visual intrusion and to prevent new dwellings which create an unacceptable sense of enclosure or appear overbearing when seen from neighbouring gardens.

### *Character and appearance*

7. The appeal site is located in the CA. According to the Council's character assessment the CA is formed around the important historic open recreational space of Twickenham Green. The busy Hampton and Staines Roads and the more sedate First Cross Road define the distinctive triangular shape of the green. Second Cross Road and the appeal site are located on the edge of the CA with older cottages on First Cross and Second Cross Roads having distinctive historic long narrow garden plots. The existing dwelling at the appeal site is identified as a Building of Town Merit.
8. As stated above, the appeal site comprises part of the long and narrow rear garden of the dwelling at 39 Second Cross Road. It is at the end of a row of other properties on Second Cross Road with similar long rear gardens with some of the gardens on Second Cross Road backing onto similar gardens to properties on First Cross Road. The appeal site backs onto a small terrace of four properties at Chilvers Close. Vehicular access to the site is via

Chestnut Road, a relatively narrow road comprising two storey terrace and semi-detached dwellings set back slightly from the pavement edge, constructed from a mixture of building materials. There are views from the end of Chestnut Road of mature trees and landscaping within the long rear gardens of properties on First and Second Cross Roads, including of the two mature trees within the garden of 27 Second Cross Road, giving this part of the CA an open and verdant character.

9. The proposed dwelling would front onto the access road to Chilvers Close, would be off-set from the end of Chestnut Road and set back from the front elevation of 22b Chestnut Road. As a result it would only become visible when viewed from towards the end of Chestnut Road meaning that longer range views of the open and verdant rear gardens of First and Second Cross Roads from Chestnut Road would be largely unaffected by the proposal. I acknowledge that long rear gardens such as those at the appeal site are characteristic of this part of the CA and that there is a general presumption against backland development. However in this case for the reasons stated, the appeal site is an exception to and differs from other rear gardens nearby in that it is bounded by development to the rear and the position of the proposal means that it is not prominent.
10. The scale, design and materials proposed are not out of keeping with the mixed character of the surrounding area and the proposed dwelling has a road frontage and utilises an existing access. As such, taking the above matters into account, I do not consider the proposed dwelling would be visually obtrusive, out of keeping with its general surroundings or harmful to the character and appearance of the CA. I also consider that the amount of garden space that would remain for the existing dwelling would be sufficient.
11. However I note that the Council has raised concerns regarding the impact of the proposal on a number of large trees located in the rear garden of the adjacent property 27 Second Cross Road. No arboricultural information was submitted with the application but an Arboricultural Method Statement Implications Assessment and Tree Protection Report (AMS) was submitted with the appeal. I note from the AMS that the large trees located within the garden of No 27 were viewed from the appeal site and that it was not possible to assess the structural condition of either tree. I also note that the proposed dwelling is located within the root protection area (RPA) of one of the trees (T2 Ash) and that the RPA of the other tree (T1 Sycamore) may be affected by the proposed parking and turning area.
12. Both of these trees are clearly visible from Chestnut Road and, due to their height, are also visible from the wider area. Though the proposed dwelling would be sited in front of T2, if retained the upper part of the tree would still be visible from Chestnut Road. The view of T1 from Chestnut Road would be largely unaffected by the proposal. Both trees make a significant contribution to the visual amenity of the area. Though the AMS assumes that both trees are to be retained, given that the trees have not been properly surveyed and the close proximity of the proposed dwelling to T2 in particular, I am not convinced based on the evidence available that retention would be possible. The loss of the trees would have a significant adverse impact on the character and appearance of the CA.
13. Taking the above matters into consideration, I conclude that the proposal would be harmful and would fail to preserve the character and appearance of

the CA. I consider the harm to the significance of the CA would be less than substantial. As such, having regard to Paragraph 134 of the Framework, this harm needs to be weighed against the public benefits of the proposal. Though the proposal would provide an additional dwelling, I do not consider that there are sufficient public benefits associated with the proposal to outweigh the harm to the CA identified.

14. Having regard to the effect of the proposal on trees, it would be harmful and would fail to preserve the character and appearance of the CA. The proposal is therefore contrary to Policy CP7 of the London Borough of Richmond Upon Thames Local Development Framework Core Strategy 2009 (CS), policies DM HO 3, DM HD 1, DM DC 1, DM DC 4, DM DC 5 and DM TP 9 of the DMP, relevant paragraphs of the Framework and to guidance contained within the Supplementary Planning Documents relating to Design Quality 2006 (DQ), RDS and SMHS. These policies and guidance seek, amongst other things, to ensure high quality design, the conservation and enhancement of the character and appearance of Conservation Areas and the protection and retention of trees that make a positive contribution to character.

*Parking and highway safety*

15. The proposed dwelling would utilise the existing vehicular access located at the end of Chestnut Road. Two off street parking spaces are to be provided for the proposed dwelling and two for the existing dwelling. No details of cycle parking for the proposed dwelling were provided with the application but have been provided with the appeal.
16. A turning head is located at the end of Chestnut Road adjacent to the vehicular access to the site. At the time of my visit I saw that it allows vehicles using Chestnut Road to turn and to exit Chestnut Road onto Staines Road. Parking areas serving properties on Chilvers Close and a property adjacent to the appeal site on Second Cross Road are also accessed from the end of Chestnut Road.
17. Despite the submission of additional information by the appellant, the Council remains concerned about the space available within the site to enable vehicles using the off street parking spaces to enter and leave the site in a forward gear. However from my observations on site I am satisfied that there is sufficient turning space available, though for some spaces this may involve a number of manoeuvres. In any event, there is no evidence that vehicles reversing out of the site onto the road at this point would be harmful to pedestrian or highway safety. I note that the road layout at the end of Chestnut Road and Chilvers Close adjacent to the appeal site allows good visibility of the vehicular access to the appeal site and the residential nature of the roads and presence of parked vehicles means that vehicles are unlikely to be travelling at speed. I am also satisfied that there is sufficient space within the site to accommodate cycle parking and that this matter could adequately be controlled by a planning condition.
18. Though a number of concerns have been raised in relation to the amount of car parking proposed for the existing and proposed dwellings, I note that no such objections were raised by the Council which found compliance with Policy DM TP 8 of the DMP. Whilst at the time of my visit I noted the high demand for on street parking along Chestnut Road, I also noted the accessible location of the

site and have no substantive evidence that leads me to disagree with the Council's conclusion in relation to this issue.

19. Taking the above matters into consideration, I conclude that the proposal makes adequate provision for vehicle and cycle parking and for turning facilities and would not result in a significant adverse impact on pedestrian or highway safety. It therefore accords with policies DM TP 2, DM TP 6, DM TP 7, DM TP 8 and DM DC 1 of the DMP, the Council's Supplementary Planning Document on Front Garden and Other Off Street Parking Standards 2006 (FGOOSP) and Manual for Streets 2007 (MFS). These policies and guidance seek, amongst other things, development to provide an appropriate level of off street parking and secure cycle parking facilities, to have adequate access facilities and to protect the pedestrian environment. However, notwithstanding the conclusion on this issue, I consider that the harm to the character and appearance of the area and living conditions is of overriding importance.

#### *Affordable housing*

20. On housing sites capable of accommodating less than ten units, Policy CP15 of the CS and Policy DM HO 6 of the DMP require a financial contribution to affordable housing commensurate with the scale of the development.
21. The appellant initially stated a willingness to make a financial contribution to affordable housing in accordance with Policy DM HO 6 of the DMP. However a planning obligation securing the required financial contribution for affordable housing was not submitted with the appeal as the appellant considered that the matter could be adequately dealt with by a negatively worded planning condition.
22. On 28 November 2014 a Written Ministerial Statement (WMS) was published which sets out Government policy on Section 106 obligations and included setting a threshold beneath which affordable housing contributions should not be sought. The WMS was however subject to a High Court judgement on 31 July 2015 upholding a joint application by West Berkshire District Council and Reading Borough Council challenging the WMS, after which the WMS was no longer a material consideration.
23. However the Court of Appeal judgement on 11 May 2016 has now upheld the Secretary of State's appeal on all grounds and overturned the High Court judgement. Consequently the WMS is again a significant material consideration and sets out the circumstances when affordable housing contributions should not be sought. These circumstances include developments of 10 units or less which is the case with the proposal. New and updated paragraphs have been added to the Planning Practice Guidance (PPG) section on planning obligations to reflect this.
24. Both parties have been consulted on the Court of Appeal judgement. The Council has responded stating that there is evidence that affordable housing need remains substantial and that small sites make a significant contribution to housing supply and therefore need to contribute to affordable housing provision through continued implementation of Policy DM HO 6. Reference is also made to an undersupply of affordable housing as set out in the Council's draft Strategic Housing Market Assessment (SHMA).
25. The approach set out within the WMS, which is reiterated in the PPG, provides clarification on national policy and is to be read alongside the Framework. The

WMS is therefore a significant material consideration in the determination of this appeal. The proposal conflicts with policy DM HO 6 in that it makes no contribution towards local affordable housing provision. Notwithstanding this, the conflict is outweighed by the change in Government policy on affordable housing contributions, as set out in the WMS. On that basis, I consider that a contribution towards affordable housing is no longer required. However, I again consider that the harm to character and appearance and living conditions carries greater weight.

### **Other Matters**

26. The proposal would provide an additional dwelling in an accessible location with access to a range of services and facilities. However neither this or any other matters are of such significance to outweigh the considerations that have led to my conclusions on character and appearance and living conditions.

### **Conclusion**

27. For the above reasons and having regard to all matters raised, I conclude that the appeal should be dismissed.

*Beverley Wilders*

INSPECTOR

# Appeal Decision

Site visit made on 12 July 2016

**by Alex Hutson MATP CMLI MArborA**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Decision date: 18 August 2016**

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**Appeal Ref: APP/L5810/W/16/3148614**

**11 Tayben Avenue, Twickenham, Richmond upon Thames TW2 7RA**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
  - The appeal is made by Mrs Jane Millar against the decision of the Council of the London Borough of Richmond-upon-Thames.
  - The application Ref 15/2819/FUL, dated 29 June 2015, was refused by notice dated 13 January 2016.
  - The development proposed is "a GF rear extension, a GF and 1st floor side extension as well as a loft extension at the rear. The single detached house dwelling is proposed to be converted into 2 self contained flats. The first flat will occupy the GF and the second flat the 1st floor and loft extension."
- 

## Decision

1. The appeal is dismissed.

## Application for costs

2. An application for costs was made by Mrs Jane Millar against the London Borough of Richmond-upon-Thames. This application is the subject of a separate Decision.

## Main Issues

3. The main issues are the effect of the proposal on the character and appearance of the area; the effect of the proposal on the living conditions of the occupiers of 5, 9 and 13 Tayben Avenue with particular regard to outlook; and whether a financial contribution to affordable housing would be required.

## Reason

### *Character and appearance*

4. The appeal property, 11 Tayben Avenue, is a two storey detached dwelling located on the northern side of Tayben Avenue. The wider area is predominantly residential in character though Twickenham Stadium lies a short distance to the north. The appeal property has a hipped style roof typical of other dwellings in the area. Alterations to other dwellings in the area, such as roof extensions and side extensions are not untypical, including in respect of the adjoining property No 9. The space above a single storey garage on the western side of the appeal property provides a modest gap at first floor level between the appeal property and No 9. However, the dwellings along this part of Tayben Avenue, including Nos 7, 9, 11 and 13 typically share a close
-



- relationship, whilst No 15, also a detached dwelling, is considerably more removed from this grouping of dwellings and is set further back from the road maintaining a substantially larger gap.
5. Views towards the rear of the appeal property, where its hipped roof is seen in the context of the similar roofscape of neighbouring dwellings, can be obtained through gaps between dwellings along Whitton Road to the north and from Tayben Road to the east. The residents of dwellings along Tayben Avenue and Whitton Road are also likely to obtain views towards the rear of the appeal property and its roof from rear windows and gardens. The architectural form of the appeal property, most notably its roof form, is consistent with and therefore positively contributes to the character and appearance of the area.
  6. Policy DM DC 1- Design Quality, of the London Borough of Richmond Upon Thames Development Management Plan 2011 (DMP) and Policy CP7- Maintaining and Improving the Local Environment, of the London Borough of Richmond Upon Thames Core Strategy 2009 (Core Strategy), require, amongst other things, development to be of a high quality design, to respect local character and to contribute positively to its surroundings, including in respect of materials and detailing. The advice set out within the London Borough of Richmond Upon Thames Design Guidelines for House Extensions and External Alterations (DGHEEA) supports these policy requirements, and further advises that a gap of approximately 1 metre should be maintained between the side wall of an extension and the boundary.
  7. The proposal seeks to replace the single storey garage with a two storey side extension, extend the roof over the side extension, add a side dormer to the eastern roofslope, extend the roof to the rear and add a ground floor rear extension. The appeal property would be converted to provide two flats.
  8. Whilst I acknowledge that the two storey side extension would erode the gap that currently exists, this gap is not particularly characteristic of the group of four dwellings. Moreover, the front setback at first floor level would assist in reducing the dominance and terracing effect of this element of the proposal and would not appear substantially different to No 9 in this regard. I therefore consider that the loss of the gap between the appeal property and No 9, in this particular instance, would not result in any material harm to the character of the streetscape or area. In addition, the proposed roof extension over the two storey side extension would be hipped and would therefore not appear particularly out of character in views from the front of the appeal property.
  9. The proposed side dormer on the eastern roofslope would be set back from the front elevation and would be set slightly lower than the main ridge height. In this sense, it would have a subordinate relationship with its host dwelling. Nevertheless, the proposed curved roof and metal cladding, which I accept is intended to reflect the contemporary appearance of Twickenham Stadium, would appear considerably at odds with the traditional character of the appeal property and its roofscape. This would be a noticeable feature in views from along Tayben Avenue to the front of the appeal property and from Chertsey Road and would appear visually incongruous as a result.
  10. The proposed rear roof extension would effectively result in the rear elevation of the appeal property appearing as three storeys. This would considerably increase the overall scale, bulk and massing of the appeal property. Furthermore, the proposed curved roof would not maintain any elements of the

rear hipped roofslope. The rear elevation and roofscape would therefore appear incongruous and considerably out of keeping with the traditional character of the appeal property and surrounding dwellings. Whilst I observed other rear roof extensions in the area, these were typically set in from the sides and eaves and stepped down from the ridge and therefore appeared subordinate to their host dwellings and maintained an element of the hipped roof form.

11. I acknowledge that the supporting text of Policy DM DC 1 notes that new design does not have to imitate architectural forms and features and more generally that the Council encourages contemporary design. Indeed, I have no reason to doubt that in some cases this is likely to be an appropriate design response, where it is compatible with its surroundings. Nevertheless, as can be seen from my reasoning above, this is clearly not the case with the proposal I am to consider.
12. The proposal, by virtue of its design, scale, bulk and massing, would therefore result in significant harm to the character and appearance of the appeal property and the surrounding area.
13. This would be contrary to Policy DM DC 1, of the DMP, and Policy CP7, of the Core Strategy. These policies are consistent with the core aims and principles of the National Planning Policy Framework (the Framework), that seek planning to secure high quality design and to take account of the different roles and character of different areas. The proposal would also be contrary to the guidance of the DGHEEA.

### ***Living conditions***

14. The proposed changes to the rear elevation and roofscape of the appeal property would clearly be visible from the gardens of Nos 9 and 13. As set out above, these changes would have a harmful effect on the character and appearance of the area. Nevertheless, the proposal would not extend beyond the rear elevation of No 13 and would barely extend beyond the rear elevation of No 9. The overall ridge height of the appeal property would not increase and the proposed alterations would not be visible from any of the rear windows of Nos 9 or 13. The proposal would not obstruct views down the gardens of Nos 9 or 13 and would not obstruct any views when looking out of these rear gardens across the rear garden of the appeal property. I therefore do not consider that the proposal would be overbearing for the occupiers of Nos 9 and 13 and I do not consider that any harm would arise to their outlook.
15. The rear garden of No 5 extends along the rear garden boundary of the appeal property. The proposal would not extend substantially closer to the rear garden of No 5 and as set out above, would not be higher than the existing ridge height. Furthermore, evergreen shrubs of a substantial height run along the rear boundary of the appeal property that would likely obscure any views from the garden of No 5 towards the proposal. I therefore do not consider that the proposal would be overbearing for the occupiers of No 5 and I do not consider that any harm would arise to their outlook.
16. The proposal would therefore comply with Policy DM DC 5- Neighbourliness, Sunlighting and Daylighting, of the DMP, that requires, amongst other things, development to protect adjoining properties from unreasonable visual intrusion. This policy is consistent with the core aims and principles of the

Framework, that seek planning to secure a good standard of amenity for all existing and future occupants of land and buildings. The proposal would also comply with the guidance of the DGHEEA in this respect which advises that extensions should not appear overbearing from gardens and rooms of adjoining houses.

### ***Affordable housing***

17. The Council sets out that a financial contribution under section 106 of the Town and Country Planning Act 1990 towards affordable housing would be required in compliance with Policy DM HO 6- Delivering Affordable Housing, of the DMP, Policy CP15- Affordable Housing, of the Core Strategy, draft Policy LP 36- Affordable Housing, of the emerging Local Plan and the London Borough of Richmond Upon Thames Supplementary Planning Guidance on Affordable Housing 2014. I acknowledge that the Council has provided comprehensive evidence to demonstrate a local need for affordable housing in the Borough in order to justify their requirement for a financial contribution. Therefore, without any legal agreement before me to secure such a contribution, the proposal would conflict with these policies.
18. **Nevertheless, subsequent to the date of the Council's decision notice, on 11 May 2016, the Court of Appeal issued judgment on the Secretary of State's appeal against a previous High Court judgment of 31 July 2015 upholding a joint application by West Berkshire District Council and Reading Borough Council which challenged the Secretary of State's Written Ministerial Statement (WMS) of 28 November 2014 and his subsequent alterations to the Planning Practice Guidance (PPG) on planning obligations for affordable housing.**
19. **The Court of Appeal has upheld the Secretary of State's appeal and** therefore the policies in the WMS and the PPG should once again be considered as national planning policy in defining the specific circumstances where contributions for affordable housing should not be sought from small scale development. The Government sets out that the purpose of these policies is to tackle the disproportionate burden of developer contributions on small scale developers, custom and self-builders with the broader aim of increasing housing supply. The policies of the WMS and the PPG are therefore material planning considerations to which I afford a significant amount of weight in the consideration of this appeal. Consequently, I afford considerably lesser weight to the abovementioned local policies given that they are now, in part, inconsistent with national planning policy.
20. I therefore conclude that, had I been minded to allow the appeal, in light of the above, an affordable housing contribution in respect of two units would not be required, notwithstanding any local need for affordable housing identified by the Council. Indeed, I consider it unreasonable for the Council to suggest otherwise.

### ***Other matters***

21. The proposal would make a modest contribution to housing supply in the Borough and would be in a location with a good level of access to local services and facilities. These matters weigh modestly in favour of the proposal. However, the harm I have identified to the character and appearance of the area would significantly and demonstrably outweigh these benefits.

22. The Council makes reference a requirement for a legal agreement under Section 106 of the Town and Country Planning Act to restrict resident parking permits. However, given my decision is to dismiss the appeal, I have not considered it necessary to consider this matter any further.
23. I acknowledge that there is some local support for the proposal. However, it falls on me to determine the appeal, based on its individual merits, my own observations and having regard to local and national planning policies, which is what I have done.

### **Conclusion**

24. Whilst I have found that no harm would arise to neighbour living conditions and there would be no requirement for a financial contribution towards affordable housing, I have found that harm would arise to the character and appearance of the area. The harm so caused would be significant and would clearly and demonstrably outweigh the benefits. Therefore, for the reasons set out above and having regard to all other matters, I conclude that the appeal should be dismissed.

*Alex Hutson*

INSPECTOR

## Costs Decision

Site visit made on 12 July 2016

**by Alex Hutson MATP CMLI MARborA**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Decision date: 18 August 2016**

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### **Costs application in relation to Appeal Ref: APP/L5810/W/16/3148614 11 Tayben Avenue, Twickenham, Richmond upon Thames TW2 7RA**

- The application is made under the Town and Country Planning Act 1990, sections 78, 322 and Schedule 6, and the Local Government Act 1972, section 250(5).
  - The application is made by Mrs Jane Millar for a partial award of costs against the Council of the London Borough of Richmond-upon-Thames.
  - **The appeal was against the refusal of planning permission for "a GF rear extension, a GF and 1st floor side extension as well as a loft extension at the rear. The single detached house dwelling is proposed to be converted into 2 self contained flats. The first flat will occupy the GF and the second flat the 1st floor and loft extension".**
- 

### **Decision**

1. The application for a partial award of costs is allowed in the terms set out below.

### **Reasons**

2. Planning Practice Guidance (PPG) advises that, irrespective of the outcome of the appeal, costs may only be awarded against a party who has behaved unreasonably and thereby caused the party applying for costs to incur unnecessary expense in the appeal process.
  3. The appellant claims that, in light of recent changes to national planning policy, the Council has acted unreasonably in that it has pursued, as part of the appeal, one of its reasons for refusal relating to the absence of a financial contribution for affordable housing under section 106 of the Town and Country Planning Act 1990. The appellant also claims that the Council has displayed a lack of co-operation and has delayed providing information.
  4. I acknowledge that **the Council's** position in respect of a financial contribution towards affordable housing was justified at the time of making its decision and at the time when the appeal was originally lodged. However, subsequently, on 11 May 2016, the Court of Appeal issued judgment on the Secretary of **State's** appeal against a previous High Court judgment of 31 July 2015 upholding a joint application by West Berkshire District Council and Reading Borough **Council which challenged the Secretary of State's Written Ministerial Statement (WMS)** of 28 November 2014 and his subsequent alterations to the Planning Practice Guidance (PPG) on planning obligations for affordable housing.
  5. **The Court of Appeal has upheld the Secretary of State's appeal and therefore the policies in the WMS and the PPG, that seek to tackle the disproportionate**
-

burden of developer contributions on small scale developers, custom and self-builders with the broader aim of increasing housing supply, should once again be considered as national planning policy in defining the specific circumstances where contributions for affordable housing should not be sought.

6. The policies of the WMS and the PPG are therefore material planning considerations to which I afford significant weight in my consideration of the appeal, notwithstanding any local affordable housing needs. As set out in my appeal decision, had I been minded to allow the appeal, in light of the above, an affordable housing contribution in respect of two units would not be required.
7. The Council, in my judgement, has not afforded the proportionate amount of weight to the policies of the WMS and the PPG during the appeal process. This **is notwithstanding a letter from the appellant's agent to the Council** dated 3 June 2016, prior to the date of the Council's **Appeal Statement**, setting out **and bringing to the Council's attention** the changes to national planning policy as described above and requesting that the Council reconsider their position. Rather, the Council continues to rely on local planning policies, including within their Appeal Statement, that are now, in part, inconsistent with national planning policy. Any local planning policies, either adopted or emerging, that require an affordable housing contribution from small scale development should, as a result, be afforded limited weight where a proposal is for such development, including in respect of the proposal under consideration in this appeal. Therefore, I consider that the Council has acted unreasonably in pursuing its reason for refusal in respect of the lack of a financial contribution for affordable housing.
8. It seems to me that, as a result, the appellant has had to spend wasted time liaising with the Council and seeking professional advice in respect of the initial considerations in formulating a legal agreement that would overcome the **Council's concerns in respect of a financial contribution towards affordable housing**. Nevertheless, prior to the **letter from the appellant's agent dated 3 June 2016**, any time spent on this matter, including two brief emails, appears to be *de minimis*.
9. **Having regard to the provisions of the WMS and the PPG, the Council's** requirement for a financial contribution towards affordable housing should reasonably have fallen away during the early stages of the appeal process and **notably so on receipt of the appellant's letter dated 3 June 2016**. The Council's pursuit of such a financial contribution therefore, in my opinion, constitutes unreasonable behaviour contrary to the basic guidance in the Framework and the PPG and has resulted in the **appellant's unnecessary expense in their** attempts to overcome this matter.

## Conclusion

10. I therefore find that unreasonable behaviour resulting in unnecessary or wasted expense, as described in the PPG, has been demonstrated and that a partial award of costs is justified.

## Costs Order

11. In exercise of the powers under section 250(5) of the Local Government Act 1972 and Schedule 6 of the Town and Country Planning Act 1990 as amended,



and all other enabling powers in that behalf, IT IS HEREBY ORDERED that the London Borough of Richmond-upon-Thames shall pay to Mrs Jane Millar, the costs of the appeal proceedings described in the heading of this decision limited to those costs incurred in dealing with the appeal on the matter of a financial contribution for affordable housing after 3 June 2016.

12. The applicant is now invited to submit to the London Borough of Richmond-upon-Thames to whom a copy of this decision has been sent, details of those partial costs with a view to reaching agreement as to the amount. In the event that the parties cannot agree on the amount, a copy of the guidance note on how to apply for a detailed assessment by the Senior Courts Costs Office is enclosed.

*Alex Hutson*

INSPECTOR

**From:** Dale Greetham  
**To:** [Local Plan](#)  
**Subject:** FW: Richmond Pre-Publication Consultation on the Local Plan  
**Date:** 16 February 2017 18:24:44  
**Attachments:** [Pre-publication Site Allocations Plan consultation on new additional sites.msg](#)

---

Dear Sir/Madam

### Publication Consultation on the Local Plan

Please see below for Sport England's comments as previously submitted. These remain relevant and valid.

Please feel free to contact me if you have any queries.

Kind regards

#### Dale Greetham

Planning Manager

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**M:** 07787 582 803

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**E:** [Dale.Greetham@sportengland.org](mailto:Dale.Greetham@sportengland.org)

[Sport England](#)



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1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



---

**From:** Dale Greetham  
**Sent:** 19 August 2016 16:59  
**To:** 'LocalPlan@richmond.gov.uk' <LocalPlan@richmond.gov.uk>  
**Subject:** Richmond Pre-Publication Consultation on the Local Plan

Dear Sir/Madam

Thank you for consulting Sport England on the above document. Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our national and regional priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.

In response to the consultation, Sport England would like to make the following comment on the consultation document:

[8 Community Facilities – 8.1 Social and Community Infrastructure – Policy LP 28 and 8.4 Public Open Space, Play Space, Sport and Recreation](#)

Unsound

Sport England welcomes the inclusion of these sections, however Sport England recommends that indoor and outdoor sports facility needs are specifically mentioned.

These sections should therefore be revised to reflect Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives' ([http://www.sportengland.org/media/162412/planning-for-sport\\_aims-objectives-june-2013.pdf](http://www.sportengland.org/media/162412/planning-for-sport_aims-objectives-june-2013.pdf)), which is in line with the NPPF. The statement details Sport England's three objectives in its involvement in planning matters;

- 1) To prevent the loss of sports facilities and land along with access to natural resources used for sport.
- 2) To ensure that the best use is made of existing facilities in order to maintain and provide greater opportunities for participation and to ensure that facilities are sustainable.
- 3) To ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.

Furthermore, this section should be in line with Paragraph 74 of the NPPF and Sport England's Playing Fields Policy (<http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/>).

These sections should also make reference to the Richmond Playing Pitch Strategy.

## 12 Site Allocations

Unsound

The following sites include (or potentially include) existing sports facilities:

- SA8
- SA9
- SA10
- SA11
- SA15
- SA16
- SA17
- SA21
- SA22
- SA27
- MOL boundary change at Harroddian School, Barnes (please see Sport England's consultation response to the Pre-Publication Site Allocations Plan – Consultation On New Additional Sites for our specific comments in relation to this site)

Planning Policy Objective 1 within Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives' ([http://www.sportengland.org/media/162412/planning-for-sport\\_aims-objectives-june-2013.pdf](http://www.sportengland.org/media/162412/planning-for-sport_aims-objectives-june-2013.pdf)), aims to prevent the loss of sports facilities and land along with access to natural resources used for sport.

Furthermore, It is understood that some of the above sites form part of, or constitute a playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No.2184). Sport England would be consulted as a statutory consultee on any forthcoming planning applications and they would be considered in light of its playing fields policy (<http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/>). A site allocation and subsequent development on the playing field aspect of these sites (which did not accord with Sport England's playing fields policy) would contravene paragraph 74 of the NPPF, which includes a strong presumption against building on open space.

Sport England objects to the allocation of the land at the above sites and any other sites unless the above policies are fulfilled.

### 13 Implementation – 13.2 Infrastructure Delivery – Infrastructure Delivery Plan – 13.2.8

Unsound

The first bullet point should be more specific about which sports facilities are included.

### Evidence Base

Unsound

The National Planning Policy Framework (NPPF) requires each local planning authority to produce a Local Plan for its area. Local Plans should address the spatial implications of economic, social and environmental change. Local Plans should be based on an adequate, up-to-date and relevant evidence base. In addition, paragraph 73 of the NPPF requires that:

“Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area.”

Paragraph 175 of the NPPF states:

“Where practical, Community Infrastructure Levy charges should be worked up and tested alongside the Local Plan.”

Sport England advocates that new developments should contribute to the sporting and recreational needs of the locality made necessary by their development.

Sport England is not aware of if a robust evidence base for indoor sports facilities has been signed off and adopted by the Council for Richmond. It is not clear how this lack of evidence base has been/will be taken into account to develop this document.

Sport England would be happy to provide further advice on how local authorities can strategically plan for sports facilities. There are a number of tools and guidance documents available, which can be found on Sport England's website at:

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>. In addition Sport England has a web based toolkit which aims to assist local authorities in delivering tailor-made approaches to strategic planning for sport. This can be found on Sport England's website at: <http://www.sportengland.org/facilities-planning/planning-for-sport/previous-guidance/>. The toolkit focuses on built facilities for sport and recreation, setting out how planners can make the best use of sport-specific planning tools in determining local facility needs. Information regarding planning obligations for sport can be found on Sport England's website at: [http://www.sportengland.org/facilities\\_\\_planning/planning\\_tools\\_and\\_guidance/planning\\_contributions.aspx](http://www.sportengland.org/facilities__planning/planning_tools_and_guidance/planning_contributions.aspx).

We hope these comments can be given full consideration. Please do not hesitate to contact me if you have any queries or would like to discuss the response.

**Dale Greetham**

Planning Manager

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**From:** Dale Greetham  
**To:** [ldf consultation](#)  
**Subject:** Pre-publication Site Allocations Plan – consultation on new additional sites  
**Date:** 17 May 2017 10:29:40

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Dear Sir/Madam

### **Pre-publication Site Allocations Plan – consultation on new additional sites**

Thank you for consulting Sport England on the above document. Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our national and regional priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.

In response to the consultation, Sport England would like to make the following comments on the consultation document:

#### Change to MOL boundary at Harrodian School, Barnes

Retaining this part of the Harrodian School site within the MOL designation boundary has the potential of being justified under The London Plan (2011) Policy 3D.10:

'The Mayor will and boroughs should maintain the protection of Metropolitan Open Land (MOL) from inappropriate development. Any alterations to the boundary of MOL should be undertaken by boroughs through the DPD process, in consultation with the Mayor and adjoining authorities. Land designated as MOL should satisfy one or more of the following criteria:

- land that contributes to the physical structure of London by being clearly distinguishable from the built-up area
- land that includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole or significant parts of London
- land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level
- land that forms part of a Green Chain and meets one of the above criteria.

Policies should include a presumption against inappropriate development of MOL and give the same level of protection as the green belt. Essential facilities for appropriate uses will only be acceptable where they do not have an adverse impact on the openness of MOL.'

Furthermore, Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives' ([http://www.sportengland.org/media/162412/planning-for-sport\\_aims-objectives-june-2013.pdf](http://www.sportengland.org/media/162412/planning-for-sport_aims-objectives-june-2013.pdf)) should be taken into account. The statement details Sport England's three objectives in its involvement in planning matters;

- 1) To prevent the loss of sports facilities and land along with access to natural resources used for sport.
- 2) To ensure that the best use is made of existing facilities in order to maintain and provide greater opportunities for participation and to ensure that facilities are sustainable.



3) To ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.

We hope these comments can be given full consideration. Please do not hesitate to contact me if you have any queries or would like to discuss the response.

Kind regards

**Dale Greetham**

Planning Manager

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	Local Plan	London Plan	Increase/Shortfall
Bromley	641	641	0
Camden	1120	889	231
Croydon	1592	1435	157
Enfield	798	798	0
Hackney	1599	1599	0
Ham' & Ful'm	1100	1031	69
Haringey	1502	1502	0
Havering	1170	1170	0
Hounslow	822	822	0
Lambeth	1195	1559	-364
Richmond Upon Thames	315	315	0
RBKC	535	733	-198
Southwark	2000	2736	-736
Tower Hamlets	3931	3931	0
Wandsworth	1812	1812	0
	<b>20132</b>	<b>20973</b>	<b>-841</b>





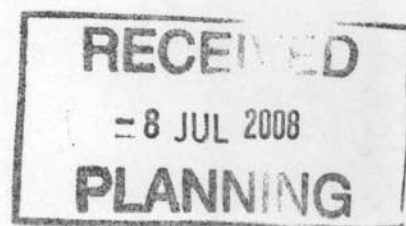


GREATER **LONDON** AUTHORITY  
Policy & Partnerships Directorate

**Robert Angus**  
Development Control  
Richmond Council  
Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ

City Hall  
The Queen's Walk  
More London  
London SE1 2AA  
Switchboard: 020 7983 4000  
Minicom: 020 7983 4458  
Web: [www.london.gov.uk](http://www.london.gov.uk)  
**Our ref:** PDU/1291aST03  
**Your ref:** 08/1760/OUT  
**Date:** 57 JUL 2008

For the attention of: Victoria Crosby



Dear Mr Angus,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008**  
**St. Paul's School, Barnes**

I refer to the copy of the above planning application, which was received from you on 30 May 2008. The Mayor has delegated his planning function to his Deputy Mayor, Government Relations, and on 4 July 2008 the latter considered a report on this proposal, reference PDU/1291a/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application broadly complies with the London Plan, but that further information is required to address current deficiencies, as detailed in paragraph 61 of the above-mentioned report.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999. The environmental information made available to date has been taken into consideration in formulating these comments.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose

the function of MOL. The design of the units has been revised to ensure that the existing residential street frontage is continued and to respond to the existing massing and height of the adjacent residential units. In addition, the units are not for general sale but are to serve the needs of the school. In this context, the development of this land is accepted.

### Summary

30 Given the current nature and function of a large proportion of MOL that is proposed to be built on, and having regard to the special circumstances demonstrated by the applicant, particularly the open space provision on the River Thames frontage and the design approach to the built form and massing of the new school buildings, on balance the development on MOL is accepted.

### **River Thames**

31 The application site benefits from a 1,100 metre River Thames frontage. The Thames Path runs along the length of this frontage. In accordance with London Plan Policy 4C.17, the Richmond upon Thames UDP designates the application site as within the Thames Policy Area. The Thames is also part of the Blue Ribbon Network. London Plan Policy 4C.11 of the London Plan states that *"The Mayor will, and boroughs should, protect and improve existing access points to, alongside, and over the Blue Ribbon Network"*. The principles of the Blue Ribbon Network in Paragraph 4.4140 seek to encourage access to and use of the Blue Ribbon Network and seek environmental improvements to it.

32 The design and access statement that is submitted with the application provides details on proposed landscaping improvements to the sites boundary with the Thames Path. This includes the creation of wetland gardens, planting of native species and grassland, tree planting and improved fencing. The proposals accord with the London Plan policies with regard to the River Thames.

### **Housing**

33 The proposal includes the provision of 45 residential units, fourteen of which will replace existing accommodation provided in the school. The units comprise a range of study bedrooms, studios, one, two and three-bed flats. The shortage of accommodation for key workers, including teaching staff, is a recognised strategic issue. To support the proposal, the applicant submitted information on the retention and recruitment issues faced by the school, and the links to lack of affordable accommodation. The inclusion of residential units for use by school staff is accepted. The exclusive use of these units by employees of the school, or other key workers who cannot afford market housing, and the complete restriction of these for private sale, must be a requirement within the legal agreement.

34 Policy 3D .13 of the London Plan sets out that *"the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs."* Given that the housing is proposed solely for use by teachers of the school, it is acknowledged that the child population will not mirror that of a standard housing development. The applicant has provided semi-private gardens at ground floor, and an area of outside recreation space within the housing section of the scheme. These will provide private outside space for the residents. In addition, residents will have direct access to the surrounding playing fields. Given the nature of the development, the provision of amenity space is accepted.

## Urban design

35 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the Blue Ribbon Network

36 When considered previously the design of the main school buildings was supported. Although in outline, the level of detail provided within the design and access statement on design principles, massing, scale and layout provides sufficient comfort that the resulting development will be of a high-quality. The relationship of the buildings with the River Thames is well considered, and the new open space adjacent to the river walk will create a more attractive space when viewed from the river and its walkway.

37 The detailed part of the application will provide a high-quality residential element, although several units are single aspect due north or due south. The revisions to these units greatly improve their relationship with the adjoining properties, which is welcomed.

38 The design of the proposal accords with London Plan design policies.

## Access and inclusive design

39 London Plan Policy 4B.5 states that *"Boroughs should require development proposals to include an access statement showing how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development, and how inclusion will be maintained and managed"*. The design and access statement provides information and commitments on inclusive design with regard to the main school buildings, reflecting its outline nature. The Council should condition the submission of detailed access statements at reserved matters stage. The detailed application is accompanied by additional information regarding access and inclusive design, which adequately demonstrates how the buildings will be accessed by all.

40 London Plan Policy 3A.5 states that all new housing should be built to 'Lifetime Homes' standards and that 10% should be wheelchair accessible, or easily adaptable for residents who are wheelchair users. The applicant has illustrated that 10% of the residential units will be wheelchair accessible, but should demonstrate compliance with the sixteen Lifetime Homes criteria. These requirements should be conditioned by the Council.

41 Subject to the applicant demonstrating compliance with the sixteen Lifetime Homes criteria the proposal accords with the housing choice, access and inclusive design policies of the London Plan.

## Climate change and mitigation

42 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which developers must address mitigation of and adaptation to the effects of climate change. Policies



4A.2 to 4A.8 of the London Plan focus on how to mitigate climate change, and the CO2 reduction targets that are necessary across London to achieve this.

#### Sustainable design and construction

43 Policy 4A.3 of the London Plan requires all development proposals to include a sustainability statement. Further guidance on this policy is given in the Mayor's SPG Sustainable Design and Construction. In accordance with London Plan Policy, the application includes details of the sustainability measures proposed. As the majority of the scheme is in outline, the applicant has made a number of commitments at this stage, which should be conditioned by the Council, these include greywater recycling, the provision of water-efficient sanitary ware, rainwater collection, use of sustainable materials and recycling facilities. A full and adequate assessment has been submitted with regard to the detailed proposal.

#### Energy

44 The applicant has submitted adequate modelling of the proposal and has demonstrated that, through a range of energy demand reduction and efficiency measures, the proposal will reduce carbon dioxide emissions by 7% beyond current building regulations. This is accepted. The applicant has proposed a heat network serving both the school buildings and the residential elements served by combined heat and power (CHP) and biomass plants, which combined will provide a carbon dioxide emissions savings of 29%, with 20% being achieved from the biomass plant. This accords with the London Plan target for renewables.

45 The applicant has not addressed the issue of cooling. The applicant should provide details on how the need for cooling has been reduced through design measures and how the remaining cooling load will be met. It should also demonstrate the availability of fuel supplies for the biomass boiler.

46 The Council should secure the delivery of the heating infrastructure by condition. In addition, the Council should include a condition that requires a detailed air quality assessment to be submitted and approved prior to the delivery of the CHP and biomass boiler plant. This will ensure that air quality issues are addressed.

47 The proposal is broadly in accordance with the London Plan's energy and sustainability proposals. However, further information is required regarding the energy strategy.

### **Transport for London**

#### Transport Assessment

48 London Plan Policy 3C.3 seeks to ensure that there is sufficient transport capacity to allow for travel generated by development, which should be determined by a transport assessment. The assessment accompanying this application provides a satisfactory evaluation of the school's travel demands.

#### Car Parking

49 The number of car parking spaces on site will be reduced as part of the school redevelopment from 282 to 261, with an additional 5 spaces for school minibuses. A total of 151 of these spaces will be for staff, 90 for overflow/set down/pick up, and 20 for visitors. TfL welcomes the rationalisation of the existing parking arrangements and the level of car parking is considered to be in line with London Plan Policy 3C.23. However, no details regarding disabled parking have been provided. TfL is therefore unable to determine whether disabled parking

provision is in line with London Plan Policy 3C.23. Further information about the quantity and location of disabled spaces is required.

#### Cycle Parking

50 Cycle parking provision for use by staff and pupils is proposed to increase from 180 to 250 cycle parking spaces as a result of the redevelopment. This is provided in accordance with TfL cycle parking standards and is therefore consistent with Policy 3C.22 of the London Plan. However, the travel plan notes that the existing cycle parking spaces are uncovered and poorly maintained, with many overgrown with foliage, whilst informal cycle parking occurs in other areas. All cycle parking spaces should be provided in easily accessible and desirable locations as well as being well maintained, secure, covered, and ideally monitored. TfL requests further information regarding cycle storage locations and proposals.

#### Travel Plan

51 TfL welcomes the production of a robust travel plan to promote and encourage sustainable travel behaviour by staff and students and to accord with Policy 3C.2 of the London Plan. All future school travel surveys should be iTRACE compliant. TfL requests that the travel plan be secured, enforced, monitored and reviewed as part of the legal agreement.

#### Servicing and Delivery

52 Servicing and refuse collection for the development would be undertaken entirely within the premises. TfL notes that some 38 servicing and delivery vehicles accessed the site in a single day during the 2005 traffic survey, which is considered to be a high level. In line with London Plan Policy 3C.25 and the London Freight Plan, TfL requires that the applicants produce a servicing management plan with a goal of rationalising servicing and delivery trips, particularly at peak times, in order to minimise the impact of this type of traffic on local highway networks and the adjacent Strategic Road Network. The servicing management plan should be prepared and agreed with the local highway authority, and TfL requests that the borough condition this as part of any planning permission for this scheme.

#### Construction Management

53 TfL welcomes the intention to segregate construction traffic from the educational and residential areas as far as practicable. As the site is adjacent to the Thames, serious consideration should be given to moving construction materials and waste to and from the site by river. In line with London Plan policy 3C.25 and the London Freight Plan, TfL requires that the applicants produce a construction management plan in order to minimise the impact of construction traffic on local highway networks and the adjacent Strategic Road Network, particularly at peak times. The construction management plan should be prepared and agreed with the local highway authority and TfL requests that the borough condition this as part of any planning permission for this scheme.

#### Summary

54 Provided that details of cycle parking and disabled car parking are provided to TfL and are satisfactory and that servicing and construction management plans are secured as part of planning permission for the scheme, TfL considers that the overall transport impact of this development would be minimal and the proposal will comply with transport policies in the London Plan.



## **London Development Agency**

55 The LDA supports this proposed development in principle given the qualitative and quantitative improvements to the St. Paul's School and the associated staff residential development. The LDA encourages the use of the schools buildings and facilities by local schools and the local community outside school times for meetings, events, sports, local training and learning opportunities, as and when appropriate. This should be secured through the legal agreement.

56 In accordance with Policy 3B.11 of the London Plan, the applicant should ensure that local residents and businesses benefit from jobs created by this proposal, particularly black and ethnic minority groups, and disabled persons or groups, in the construction phase of the development. Initiatives to create training and employment opportunities for the local community during construction should be set out in an employment and training strategy, as well as the need to address other barriers to employment. Similarly the applicant should also secure the use of local businesses during construction as well as in the procurement of services and supplies from small and medium size enterprises or micro businesses. The applicant should submit a training and employment package, which includes these measures. This should be secured within the legal agreement.

57 Subject to the resolution of these and other matters raised in this report the LDA supports this application in principle.

## **Local planning authority's position**

58 The Council are due to consider the proposal in July 2008.

## **Legal considerations**

59 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## **Financial considerations**

60 There are no financial considerations at this stage.

## **Conclusion**

61 London Plan policies on Metropolitan Open Land, the River Thames, urban design, access, sustainable design and construction, climate change mitigation and adaptation, transport and local employment initiatives are relevant to this application. In broad terms, the application complies with these policies but in some circumstances further information is required to ensure compliance.

- Metropolitan Open Land: Given the current nature and function of a large proportion of MOL that is proposed to be built on, and having regard to the 'special circumstances', particularly the open space provision on the River Thames frontage and the design approach to the built form and massing of the new school buildings, on balance the development on MOL in this case is accepted.
- River Thames: The application adequately responds to London Plan policies with regard to the River Thames.
- Housing: The provision of housing for school staff is accepted. The Council should secure the permanent use of the housing for key workers through the legal agreement.
- Urban design: The proposal accords with London Plan design policies.
- Access: The proposal accords with the London Plan requirement to demonstrate how inclusive design principles will be integrated into the proposals. The applicant also accords with the requirement to provide 10% of housing as wheelchair accessible. However, the applicant has not demonstrated compliance with London Plan Policy 3A.5 to deliver all new housing to Lifetime Homes standards.
- Sustainable design and construction: In accordance with London Plan Policy 4A.3, the applicant has submitted a sustainable design and construction strategy. The Council should secure the measures proposed by condition.
- Climate change mitigation and adaptation: The proposal is broadly in accordance with London Plan energy policies. Further information is required regarding predicted heat loads, cooling and fuel supply.
- Transport: The proposal is broadly in accordance with London Plan transport policies. Further information is required regarding cycle parking and disabled parking. The Council should secure the travel plan through the legal agreement and the delivery of a servicing and construction management plan as part of any planning permission.

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and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Yours sincerely,

  
pp **Giles Dolphin**

Head of Planning Decisions

cc Tony Arbour, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning and Spatial Development Committee  
John Pierce and Ian McNally, GOL  
Colin Lovell, TfL  
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London N1 9RL



**St. Paul's School**

in the London Borough of Richmond upon Thames

planning application no. 08/1760/OUT

**Strategic planning application stage 1 referral (new powers)**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

**The proposal**

Phased redevelopment of existing school buildings with associated staff residential units, landscaping and cycle and car parking.

**The applicant**

The applicant is **St. Paul's School**, and the architect is **Patel Taylor Architects**.

**Strategic issues**

The redevelopment of the school is acceptable in principle. The proposal is broadly in accordance with London Plan **energy, sustainability, River Thames, design** and **transport** policies although further information is required in relation to some of these matters. The Council should ensure through condition that the minimum amount of development is constructed on functioning **Metropolitan Open Land**, and that the **housing** provided remains for use by key workers.

**Recommendation**

That Richmond upon Thames Council be advised that the application broadly complies with the London Plan, but that further information is required to address current deficiencies, as detailed in paragraph 61 of this report.

**Context**

1 On 30 May 2008 the Mayor of London received documents from Richmond upon Thames Council notifying him of a planning application, received on 27 May 2008, of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 10 July 2008 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.



2 The application is referable under Categories 1B and 3D of the Schedule to the Order 2008:

- *"Development which comprises or includes the erection of a building or buildings outside Central London and with a floorspace of 15,000 sq.m."*
- *"Development on land allocated as Metropolitan Open Land in the development plan, proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and which would involve the construction of a building with a floorspace of more than 1,000 sq.m. or a material change in the use of such a building"*.

3 Once Richmond upon Thames Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## **Site description**

6 The 18-hectare school site is located on the River Thames, adjacent to Hammersmith Bridge (the application site itself covers 10.38 hectares). The site is bounded to the north by a 1,100 metre River Thames frontage, to the east by the A306 Castelnau leading to Hammersmith Bridge (part of the Strategic Road Network), to the south by residential streets and the east by the Swedish School. The main site access is located on Lonsdale Road, with secondary pedestrian entrances on Castelnau (during peak school entry/exit periods only) and St. Hilda's Road. The nearest Transport for London Road Network is the A4 Hammersmith Flyover, approximately 500m to the north.

7 The site has a public transport accessibility level ranging from one to two, on a scale of one to six, where six is most accessible. The closest Underground station is located in Hammersmith, located approximately one kilometre away, and provides access to the Hammersmith and City, Piccadilly and District lines. A range of bus services are located within walking distance of the school, including routes 33, 72, 209, 283 and 419. Route 31 of the London Cycle Network runs along Boileau Road approximately 200 metres to the east of the main site entrance.

8 The site comprises two independent schools, Colet Court which caters for boys aged between seven and thirteen, and St. Paul's School which caters for boys aged between thirteen and eighteen. There are currently 1,295 pupils attending both schools, 835 at St. Paul's and 430 at Colet Court.

9 The existing school buildings are located together at the centre of the site, with school playing fields located to the west and east. The existing school buildings were constructed in the late 1960s and are largely of a prefabricated lightweight design. Additional buildings were added in the 1980s and 1990s. The buildings range in height, from two to four storeys. The application site includes a strip of car parking along the main school entrance and a property on Lonsdale Road.

10 A large proportion of the site is designated as Metropolitan Open Land in the 2005 Richmond upon Thames Unitary Development Plan. The boundary of the MOL designation is drawn tight around the development envelope of the existing buildings.

## Details of the proposal

11 St. Paul's School is seeking part-outline, part-full planning permission for the phased redevelopment of the existing school. The outline planning application is seeking permission for the refurbishment of the existing school sports hall and the construction of a maximum 36,090 sq.m. of educational floorspace, comprising classrooms, dining hall and kitchen, assembly hall, library, chapel, junior music school, boat house and associated accommodation (one residential unit), sports pavilion and ancillary boarding accommodation (forty bed spaces) and associated staff accommodation (three residential units). The proposal includes reconfigured vehicular circulation, car parking, cycle parking and landscaping. The proposed buildings range in height from two to four storeys. The application comprises a masterplan, which establishes a series of parameters. The layout, scale, appearance and landscaping of the outline application are matters reserved for future determination. Under the terms of the Town and Country Planning (Mayor of London) Order 2008, the Mayor does not have a statutory right to consider applications at the reserved matters stage. Therefore, unless revised or new applications are submitted on this site, or future applications do not comply with the legal agreement or EIA parameters, the Mayor's only statutory involvement in these proposals is at this outline stage.

12 An element of the planning application is submitted in full. This comprises 33 residential units (2,758 sq.m. floorspace) for full time school personnel, with underground car parking and cycle parking. The proposed buildings range in height from three to four storeys (including basement and attic levels). The landscaping of this full application is a reserved matter for future determination, and therefore does not form part of this submission.

13 The proposals will not increase the number of pupils at either school, but rather seeks to address the issue of the declining building stock, to meet the Government's educational space standards, and improve inclusive access through lifts and widened corridors.

## Case history

14 The previous Mayor considered an application submitted by St Paul's School for the redevelopment of the school on 1 August 2007 (ref. PDU/1291/01) and determined that the principle of the redevelopment was acceptable. The previous proposals were largely the same as this recent application. On 14 December 2007 Richmond upon Thames Council refused the application for the following reason: *"The proposed residential block A by reason of its design, siting, bulk and massing would be out of character with the nearby properties on Lonsdale Road and thereby detrimental to the character and appearance of the streetscene, the setting of nearby buildings of townscape merit and the Castelnau Conservation Area"*.

15 The applicant has subsequently revised the proposal to address the Council's concern regarding block A, and local resident's concerns regarding block B. The outline element of the application, which relates to refurbishment and development of the school buildings, remains unchanged. The aspects that have been revised relate to:

- Changes to the design, massing and siting of block A on the Lonsdale Road frontage which address the reason for refusal and include:
  - alteration to the roof form to introduce gables and reduce its overall bulk,

- the re-siting and reduction of a large projecting element, which now takes the form of two vertically proportioned bays aligning with the gables,
  - the use of more consistent ashlar stone cladding on the front elevation,
  - reducing the mass of block A by pulling in the rear (north) elevation, and
  - a different approach to the pattern of fenestration with a greater vertical emphasis and deep reveals.
- Amendments to the layout, massing, height and elevational treatment of block B to address concerns of neighbouring residents. These include:
    - the re-siting of the entrance to the basement parking area to the centre of block B,
    - a reduction in the height of block B to single-storey where it would be seen along Glenthams Road,
    - alteration of the design of the elevations fronting Lillian Road and Glenthams Road,
    - retention of the existing change in level at the end of Lillian Road, and
    - reducing the footprint of block B where it is closest to Lillian Road and 78 Lonsdale Road.

## **Strategic planning issues and relevant policies and guidance**

16 The relevant issues and corresponding policies are as follows:

- |                                 |   |
|---------------------------------|---|
| • MOL                           | <i>London Plan; PPG2</i>  |
| • River Thames                  | <i>London Plan; Mayor's draft Water Strategy; PPS25, RPG3B</i>  |
| • Housing                       | <i>London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG</i>   |
| • Urban design                  | <i>London Plan; PPS1</i>  |
| • Access                        | <i>London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Wheelchair Accessible Housing BPG; Planning and Access for Disabled People: a good practice guide (ODPM)</i> |
| • Climate change and mitigation | <i>London Plan; PPS, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor's Energy Strategy; Sustainable Design and Construction SPG</i>                         |
| • Transport                     | <i>London Plan; the Mayor's Transport Strategy; PPG13</i>   |

17 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2005 Richmond upon Thames Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004). The 2007 Core Strategy (Issues and Options Stage) is also a relevant material consideration

## **Metropolitan Open Land**

18 Both the previous Mayor and the Council accepted the principle of development on MOL as part of the previous proposal. The revised proposal has resulted in a minor decrease in development on MOL from 3,948 sq.m. to 3,907 sq.m. as a result of the reconfiguration of the residential blocks within the detailed planning application. The argument for development on MOL remains that of the previous scheme and is provided again here.



19 The majority of the site is designated as Metropolitan Open Land (MOL) in the Richmond upon Thames Unitary Development Plan 2005. London Plan Policy 3D.10 states that *"The Mayor will and boroughs should maintain the protection of Metropolitan Open Land from inappropriate development"*. The London Plan affords MOL the same protection as that given to Green Belt. Planning Policy Guidance Note 2: Green Belt states that *"Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations"*. Policy 3D.9 of the London Plan states that *"There is general presumption against inappropriate development in the Green Belt, and such development should not be approved except in very special circumstances"*. This approach is consistent with PPG2.

20 The applicant has submitted detailed information in respect of the proposed development on MOL, and has provided an overview of its MOL case. The proposal includes the construction of 3,907 sq.m. footprint within MOL.

21 The applicant argued within the original submission that the harm caused to MOL by the development is limited. The applicant has broken down the types of development on MOL into three separate areas, each with its own justification, namely development on MOL that does not fulfil the function of MOL, development on MOL immediately adjacent to existing permitted development and development on open MOL which is for the purposes of sport. Each one is considered here in turn.

#### Development on MOL not fulfilling the purposes of MOL

22 Policy 3D.10 states that land designated as MOL should satisfy one or more of the following criteria:

- Land that contributes to the physical structure of London by being clearly distinguishable from the built-up area.
- Land that includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities.
- Land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level.
- Land that forms part of a Green Chain and meets one of the above criteria.

23 Table 1.1 illustrates that a minimum of 69% of the total quantum of MOL land proposed to be built on is already developed land. The current uses of this land include a range of tarmac car parks, access roads and existing buildings. As such, these areas are not distinguishable from the built-up area, are not of a nature conservation or habitat value, and it could therefore be argued that the areas of land do not fulfil the function of MOL land. The land is currently screened by an avenue of trees which act as an existing border to the open playing fields to the west, and the residential streets to the east. The applicant has submitted illustrative material indicating the quality and function of the land. A case could be made for these areas to be de-designated as MOL through the Local Development Framework process. This approach is supported by London Plan policy and national guidance. Richmond upon Thames Council has not undertaken this policy-led approach, therefore the principle of development on MOL must be tested through the application process.

	Development footprint in MOL (sq.m.)	Development footprint in 'developed' MOL (sq.m.)	Percentage of proposed development on MOL currently developed
Plot 7	650	604	93%
Plot 4	1030	371	36%
Housing	727	623	86%
Boathouse	1200	1012	84%
Pavilion	300	68	23%
<b>Total</b>	<b>3907</b>	<b>2678</b>	<b>69%</b>

Table 1.1 accommodation schedule in MOL

24 As the masterplan has a 20-25 year lifespan, the exact location of buildings within the masterplan area has yet to be defined. Therefore the application cannot fix at this stage how much development will be on MOL land currently developed, and how much will be on MOL land that is not currently developed. As such a series of maximums and minimums have been proposed. Table 1.1 illustrates the total amount of land within MOL that will be developed. However, these figures are worst case scenario and through detailed design it may be possible to increase the proportion of development on 'developed' MOL. The Council should therefore condition that a minimum of 69% of development on MOL will be on land not fulfilling the function of MOL. Using plots seven and four as an example, if these two blocks were built to maximise built footprint on currently developed MOL, the overall percentage of the development on such land would rise from 69% to 79%. This approach would reduce the development on open MOL land and should therefore be encouraged by the Council at the detailed design stage.

	Development footprint in MOL sq.m.	Minimum development footprint in 'developed' MOL land sq.m.	Maximum development footprint in 'developed' MOL land
Plot 7	650	604	637
Plot 4	1030	371	726
<b>Total</b>	<b>1680</b>	<b>975 (58%)</b>	<b>1363 (81%)</b>

Table 1.2 minimum and maximum development scenarios

#### Development on MOL land immediately adjacent to existing permitted development

25 There is approximately 1229 sq.m. of MOL that is not currently developed land that will be developed as part of the masterplan. The majority of this land is on the edge of the existing

school building envelope, which is not designated MOL. Due to the need for a phased approach to redevelopment, whilst maintaining school use, it is necessary to develop some buildings outside the existing building envelope. The applicant has sought to minimise such development the majority of which is located immediately adjacent to existing development. The impact on the openness of the site will therefore be minimised.

#### Development on open MOL which is for the purposes of sport

26 However, a section of MOL proposed to be built on is not located adjacent to the existing permitted built envelope. As part of the masterplan the applicant is seeking to expand and improve the existing sports pavilion, located in the west playing field. The pavilion currently comprises storage for sports equipment, changing and shower facilities, toilets and a kitchen. However, the applicant has stated that there is currently insufficient changing, shower and toilet space to allow separation and proper accommodation of visiting teams and staff, in addition to a lack of proper kitchen and first aid facilities. The proposals seek to improve this facility to enable it to be successfully used as a facility for home and away teams using the sports fields. The facility avoids the need to walk to and from the main school buildings and for security reasons allows for the sports grounds to be used without requiring access to the main school buildings. The masterplan seeks to increase this facility by 232 sq.m. Although this will be built on the schools playing field, it is used to help facilitate the use of the fields for sport, and in this case is accepted.

#### Special circumstances

27 In addition to illustrating the quality and use of the existing land, the applicant has produced a list of special circumstances to be taken into account when assessing the proposal. Of particular importance are:

- The overall effect on openness, views and visual amenity across the site. For example, the masterplan is designed to pull back and reduce the built form on the river edge, and to reduce height and punctuate buildings on the eastern edge, compared to the existing school.
- The need for replacement and enhanced educational buildings, in a phased approach, whilst maintaining continuous school use.
- The creation of a 4,650 sq.m. area of open space on the River Thames frontage for use by the schools. This area exceeds the footprint of buildings to be constructed on MOL (both on developed and non developed MOL land), and will create an increased sense of openness from the river path.

28 The applicant has provided a detailed statement of its community links to illustrate the wider benefits of the school to London. This document was drafted by the schools Community Links Coordinator, and includes details of various initiatives such as mentoring of local school children and use of the school facilities by sports clubs and local groups, including local school sports days.

29 A section of existing MOL is proposed to be redeveloped to provide housing units for school staff. Whilst housing is not an appropriate land use on MOL, the land on which the housing will be built is on 'developed' MOL, therefore the applicant has sought to reduce its impact. The land is currently a tarmac car park, is separated from open MOL by the school access road and screened by an avenue of trees, and is adjacent to existing residential units. Therefore it can be argued that this land is urban and not open in character and does not fulfil





This drawing is submitted for illustrative purposes only and does not form part of the planning application

Key

Proposed Building Hierarchy

- 4650 sqm
- Open land created adjoining tow path
- 2375 sqm
- Proposed maximum inappropriate development within MOL
- 1516 sqm
- Existing buildings adjoining tow path removed
- 
- Building Retained
- 
- Metropolitan Open Land Boundary
- 
- Conservation Area Boundary
- 
- Environment Agency 16m Ecology Zone

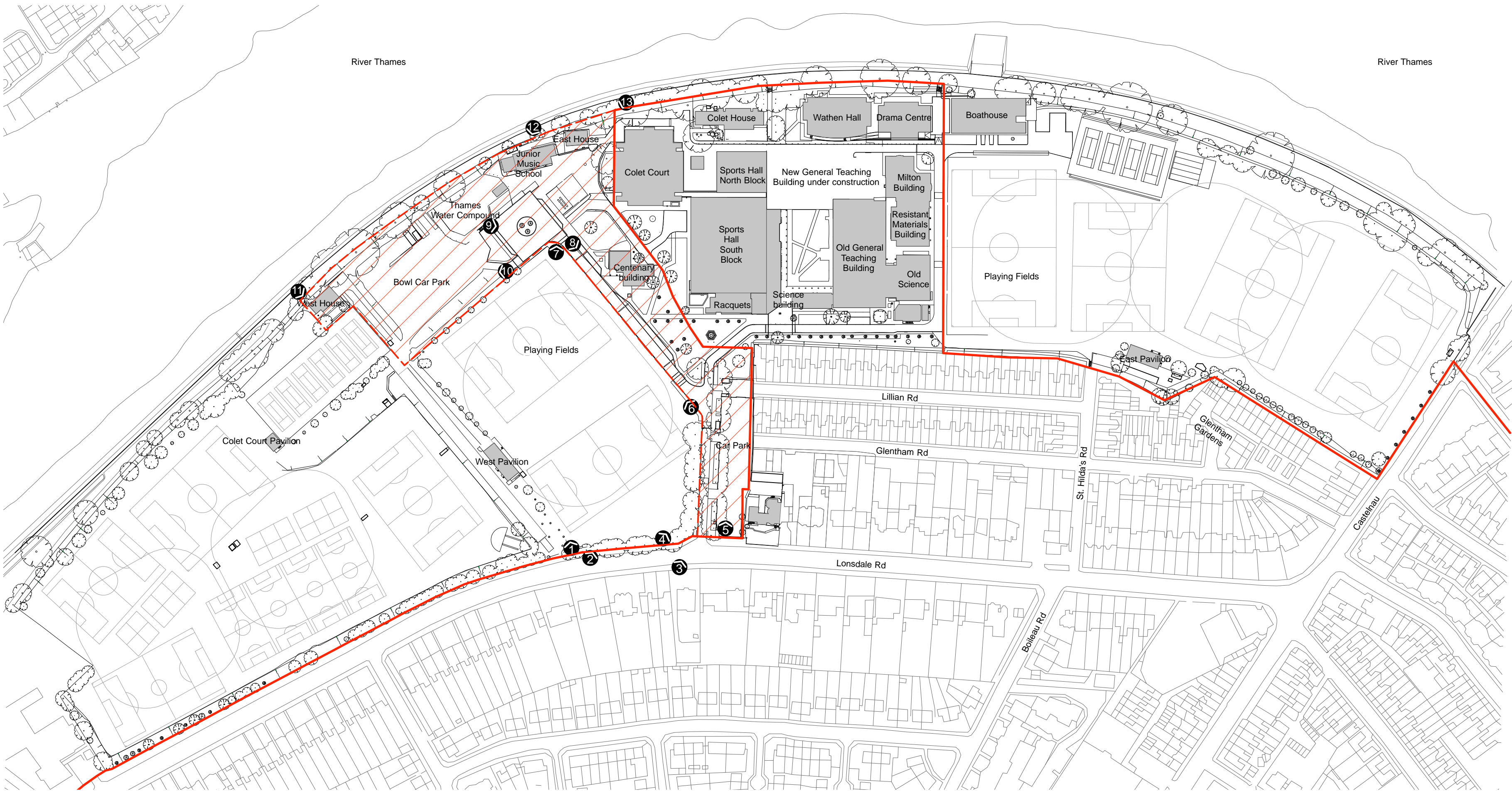
PL1 15.04.08	pt	planning boundary and building footprint amended	pt
PL 15.05.07	LB	Planning submission	pt

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Architecture	Landscape	Urban Design
Client	ST PAUL'S SCHOOL	
Project	ST PAUL'S SCHOOL	
Title	MOL Gain Drawing	
Job No.	317	Drwg No. 20.070
Scale	1:1250 @ A1	Rev PL1
Date	22.03.05	Sheet A1
Drawn	yyj	Checked pt

Do not scale. All dimensions to be checked on site and errors to be reported to architect. Illustrated material subject to copyright





Site Plan, 1:2000

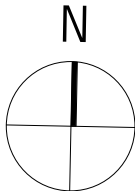


Aerial Image, NTS

KEY

- Existing Metropolitan Open Land (MOL) boundary
- Proposed Metropolitan Open Land (MOL) boundary
- Denotes land proposed to be removed from MOL status

for consultation

Notes	Rev Date 00 17.08.2016		Amendment Issued for first consultation on the draft Local Plan			<b>WALTERS &amp; COHEN</b> ARCHITECTS St Paul's School, Masterplan	2 Wilkin Street London NW5 3NL		Telephone 020 7428 9751 mail@waltersandcohen.com	
							1604-PR-1002			
							MOL boundary			
		Checked by MAC	Scale 1:2000@A1	Date Drawn 17.08.2016	Job No. 1604	Drawing No. 1604-PR-1002	Revision 00			



# Viewpoint 1





# Viewpoint 2





# Viewpoint 3





# Viewpoint 4





# Viewpoint 5





# Viewpoint 6





# Viewpoint 7





# Viewpoint 8





# Viewpoint 9





# Viewpoint 10





# Viewpoint 11





# Viewpoint 12





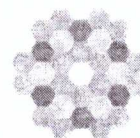
# Viewpoint 13





Land Registry  
Official copy of  
title plan

Title number **TGL394983**  
Ordnance Survey map reference **TQ1269SE**  
Scale **1:1250**  
Administrative area **Richmond upon Thames**



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*Stain Hill  
Reservoir*







*Sunnyside  
Reservoir*

*Spelthorne  
B.C*

*River Thames*

*L. B. Richmond*

-  *My land*
-  *Post-1993 Admin. boundary*
-  *G. B. Boundary*
-  *1996 GB extension*

This official copy is incomplete without the preceding notes page.



# RE: Spelthorne Green Belt in 1991

Cook, Hannah <H.Cook@spelthorne.gov.uk>

Mon 09/01/2017 10:13

To: david harvey taylor <davidharveytaylor@hotmail.com>;

 2 attachments (681 KB)

Sunnyside Land Registry plan - 1-250 marked-up.pdf; LP 1991.pdf;

Dear Mr Taylor,

After reviewing the 1991 Spelthorne Local Plan Proposals Map, I can confirm that the land outlined in TGL394983 was not designated as Green Belt in Spelthorne in 1991. I have attached both maps again for clarity and comparison.

I hope this helps with your query.

Kind regards,

**Hannah Cook**

**Planning Policy Officer**  
**Spelthorne Borough Council,**  
Council Offices, Knowle Green, Staines-upon-Thames, TW18 1XB  
01784 446405

# SPELTHORNE BOROUGH LOCAL PLAN

## PROPOSALS MAP

### KEY



Plan area boundary (notations outside of this area are shown for information only)



Borough boundary where different to Plan area boundary



Green Belt



Proposals



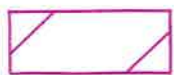
Major commitments



River Thames — area of special character



Area of special landscape character



Landscape improvement areas



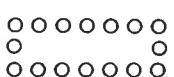
Sites of Special Scientific Interest



Local sites of nature conservation interest



The area of Poyle and Stanwell Moor referred to in Council's noise policy criteria



Colne Valley Park



Conservation areas



Common land



Areas liable to flood



Public safety zones



Noise and Number Index (NNI) Contours (Summer 1988)  
(These contours are reviewed regularly and are liable to change during the Plan period)



Heathrow Airport



Inset map boundary (notations shown within the boundary on this Plan are for information only)

**R12**

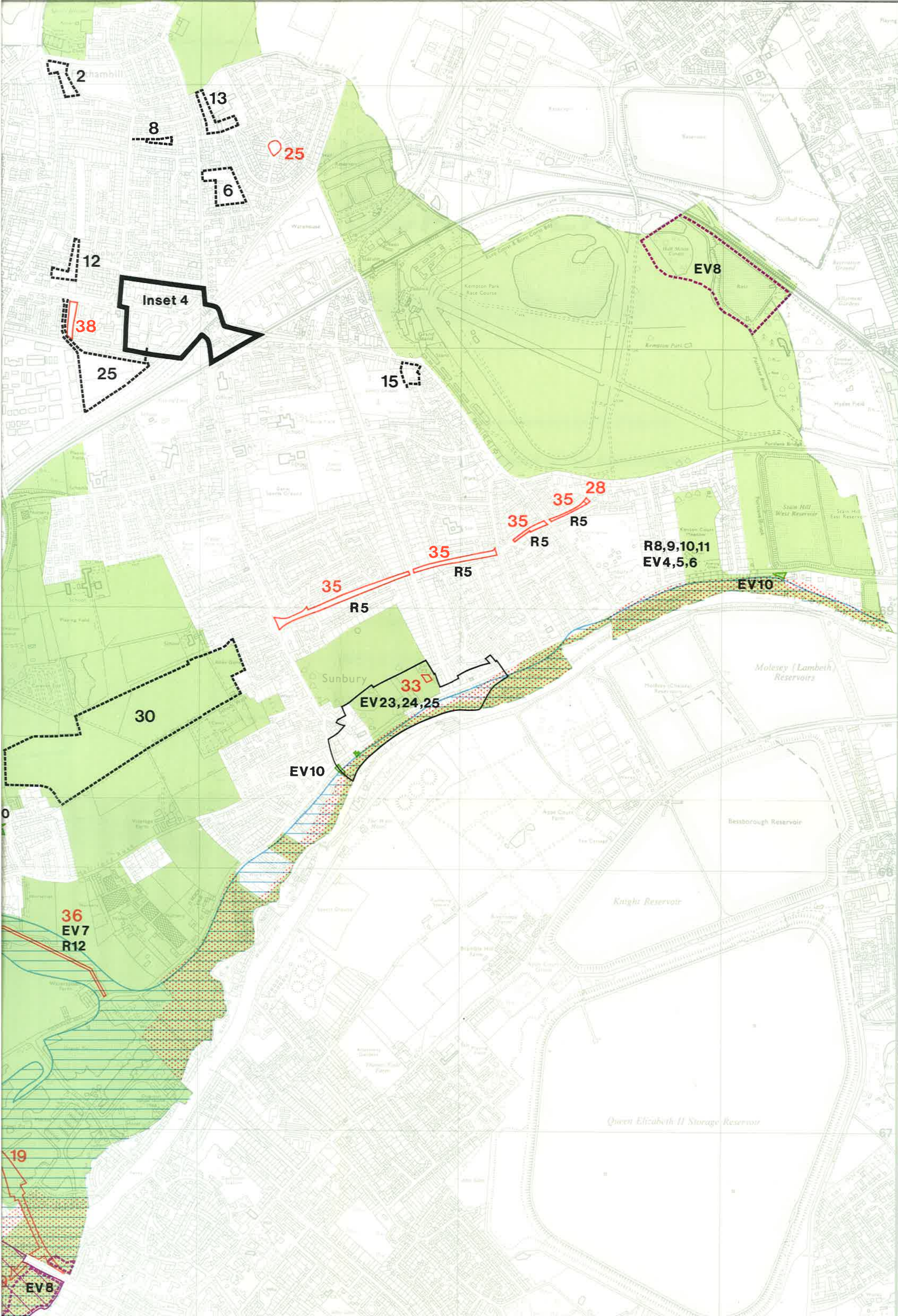
Reference to Policy in Written Statement (unless identified on Proposals Map, all other Policies refer to the whole Plan area)

Scale: 1:12000

Date: May 1991







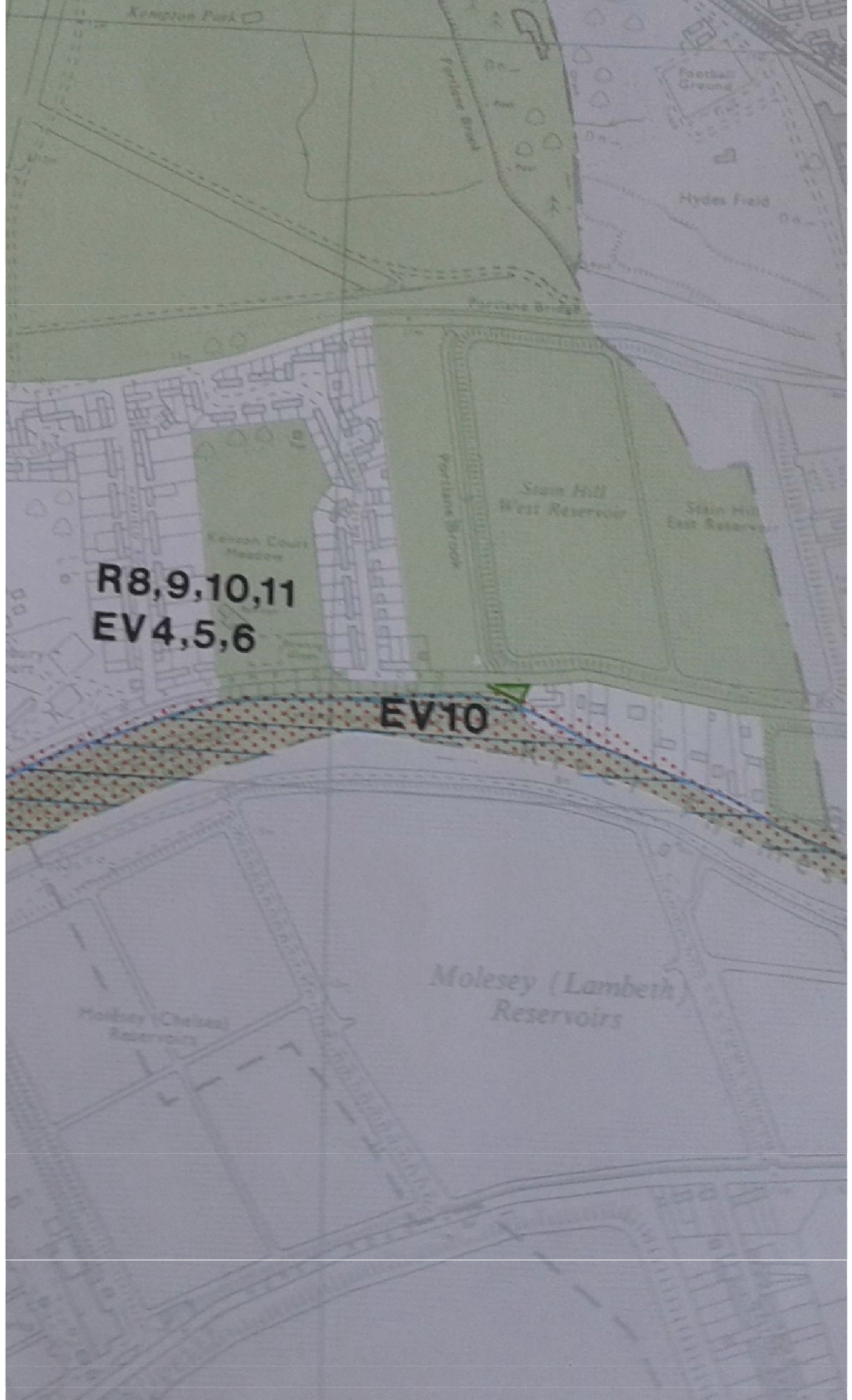


**R8,9,10,11**  
**EV4,5,6**

**EV10**

*Molesey (Lambeth)  
Reservoirs*

*Molesey (Chelsea)  
Reservoirs*



**The Council will protect and enhance the green belt as shown on the proposals map. There will be a general presumption against inappropriate development. New buildings proposed on land adjoining the green belt will be required to have minimum visual impact when viewed from the green belt.**

4.27 The green belt within the Borough is shown on Map 3. The Council has amended the green belt boundary through an addition at Hampton. The new boundary is shown in detail on Map 4 and detailed justification for the extension is provided below.

4.28 The new area includes the western section of Platt's Eyot and that part of the Thames between Hampton and the Borough's western boundary. The western section of Platt's Eyot has many trees and an attractive rural appearance; as such, it requires safeguarding against development so as to protect the special character of the river at this point. Inclusion of the Thames within the green belt would be consistent with the green belt as defined in the adjoining Spelthorne Borough Local Plan.

4.29 The main purposes of the green belt are:

- to check the unrestricted sprawl of the built up area;
- to safeguard the surrounding countryside from further encroachment;
- to prevent Greater London from merging with neighbouring towns or urban areas;
- to assist in urban regeneration;
- to provide access to open countryside and recreational opportunities;
- to maintain and provide habitats for wildlife.

4.30 Every application for planning permission in the green belt will be considered on its merits, but the following are the general uses which, together with appropriate buildings, would be acceptable:

- (a) agriculture, horticulture and forestry;
- (b) nature conservation;
- (c) predominantly open air recreational facilities, for which adequate provision cannot be made within the urban area, which conserve and enhance the open nature and character of the green belt and maintain its nature conservation interest;
- (d) educational and institutional uses standing in extensive grounds;
- (e) river based uses provided they will preserve the open nature of the area;
- (f) operational water works land.

In relation to those uses identified above which are considered to be acceptable in the green belt, the Council will, in determining such applications, pay particular regard to ensuring that they protect and enhance the open nature and visual qualities of the green belt. The policy also recognises there may be modest buildings, or extensions including structures in the river which are related to the function of the green belt, and where this would not have a harmful effect on its character.

4.31 Approximately half of the Borough's green belt comprises operational waterworks, with most of the remainder in various open recreational uses. To ensure the green belt continues to fulfil its intended functions and to preserve its permanence it is essential that its open character and wildlife interest are maintained.

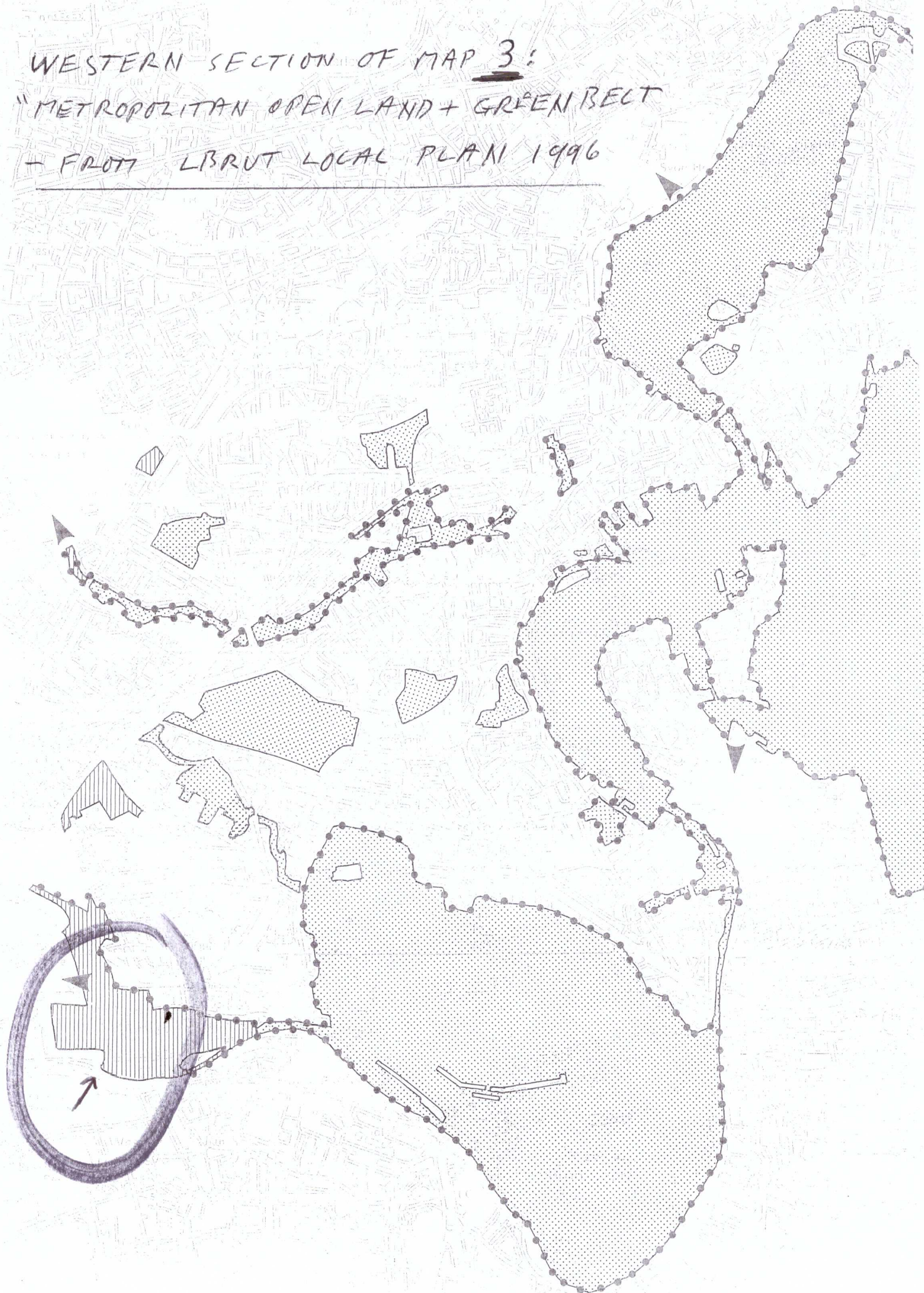
4.32 Degraded landscape quality arising from neglect or misuse of land will not be sufficient justification for allowing development contrary to green belt policy. In these circumstances the Council will endeavour to see the under-used land brought into an appropriate open use.

4.33 The Council will seek the co-operation of other landowners, including Thames Water, to enhance the quality of the green belt, for instance through landscaping schemes. Should waterworks land cease to be operational the Council will endeavour, in conjunction with the water authority, to bring such land into appropriate open recreational use allowing public access, while protecting and enhancing its potential as wildlife habitat.

(See in particular proposals H2, H3, H15, H16).



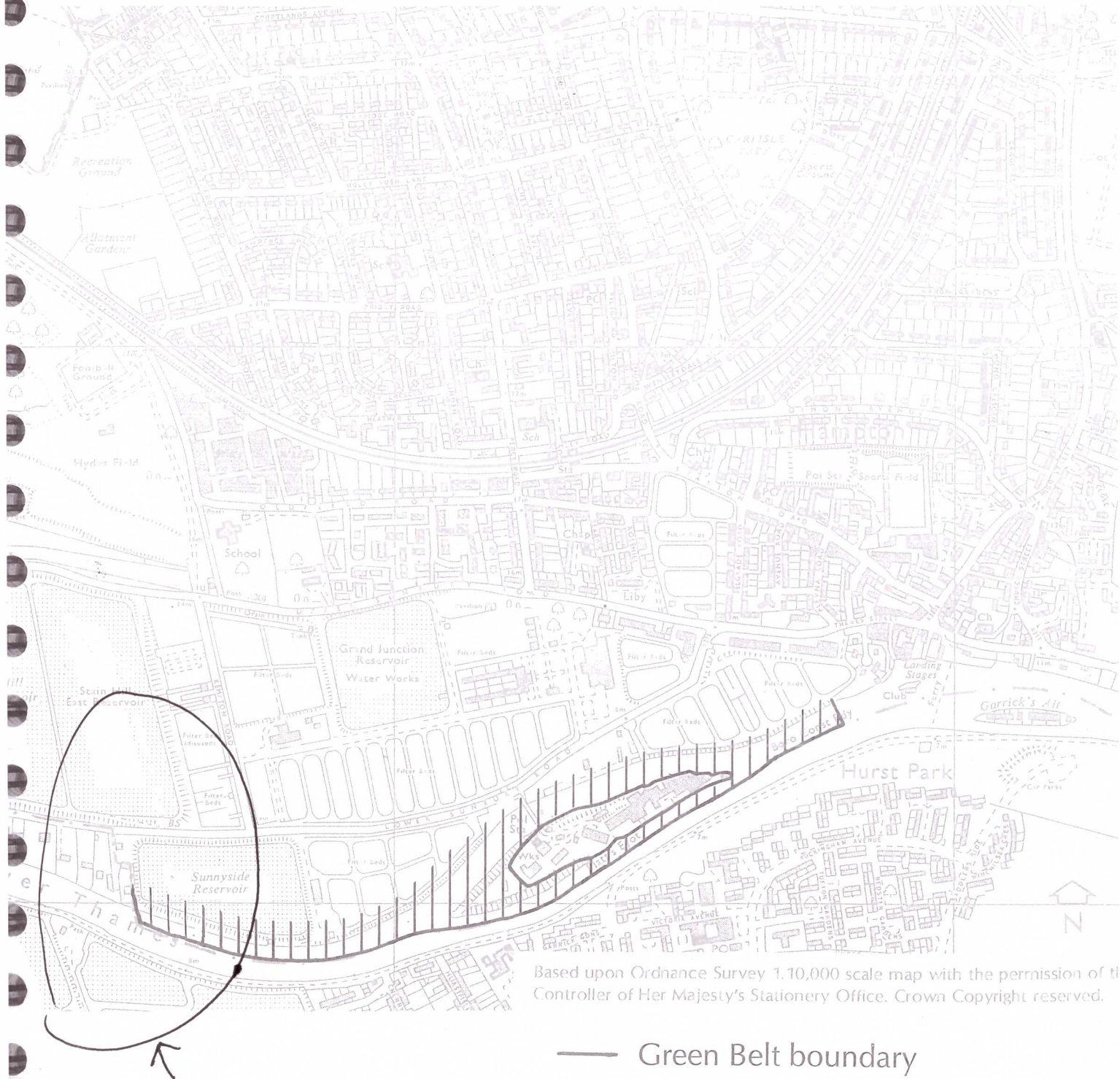
WESTERN SECTION OF MAP 3:  
"METROPOLITAN OPEN LAND + GREEN BELT"  
- FROM LBUT LOCAL PLAN 1996





# Map 4

## MODIFICATION TO GREEN BELT BOUNDARY

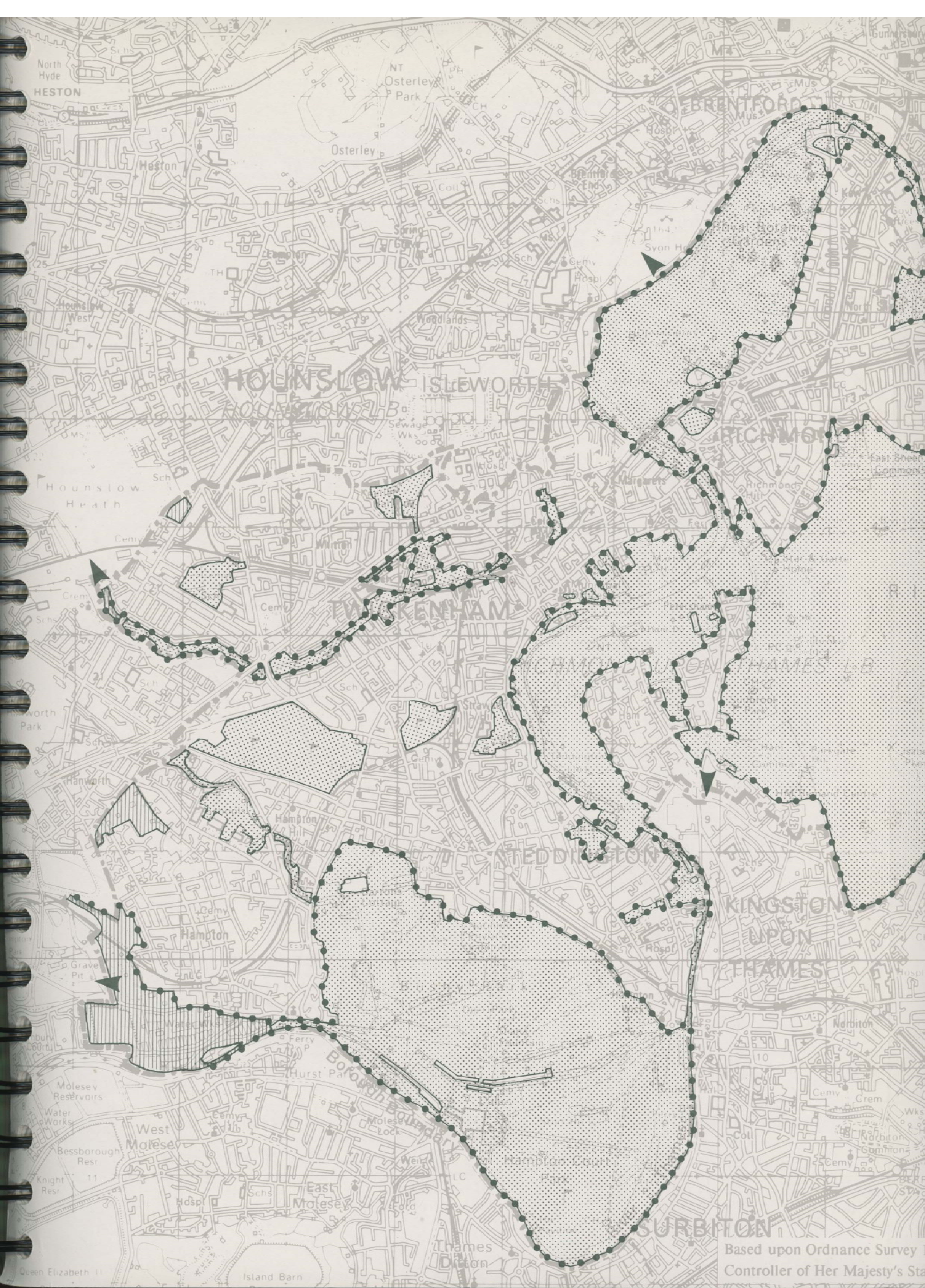


Richmond upon Thames  
Unitary  
Development  
Plan

0 km 1/4 1/2 1/4  
0 miles 1/4 1/2

Scale 1:10,000










# Map 3

## METROPOLITAN OPEN LAND & GREEN BELT

 Metropolitan open land  
(policy ENV 3)

 Green Belt  
(policy ENV 4)

 Green chains  
(policy ENV 7)  
for identification of areas see para 4.41  
see also Green chains on proposal map

 Green chains continued  
beyond Borough boundary

Richmond upon Thames

Unitary  
Development  
Plan

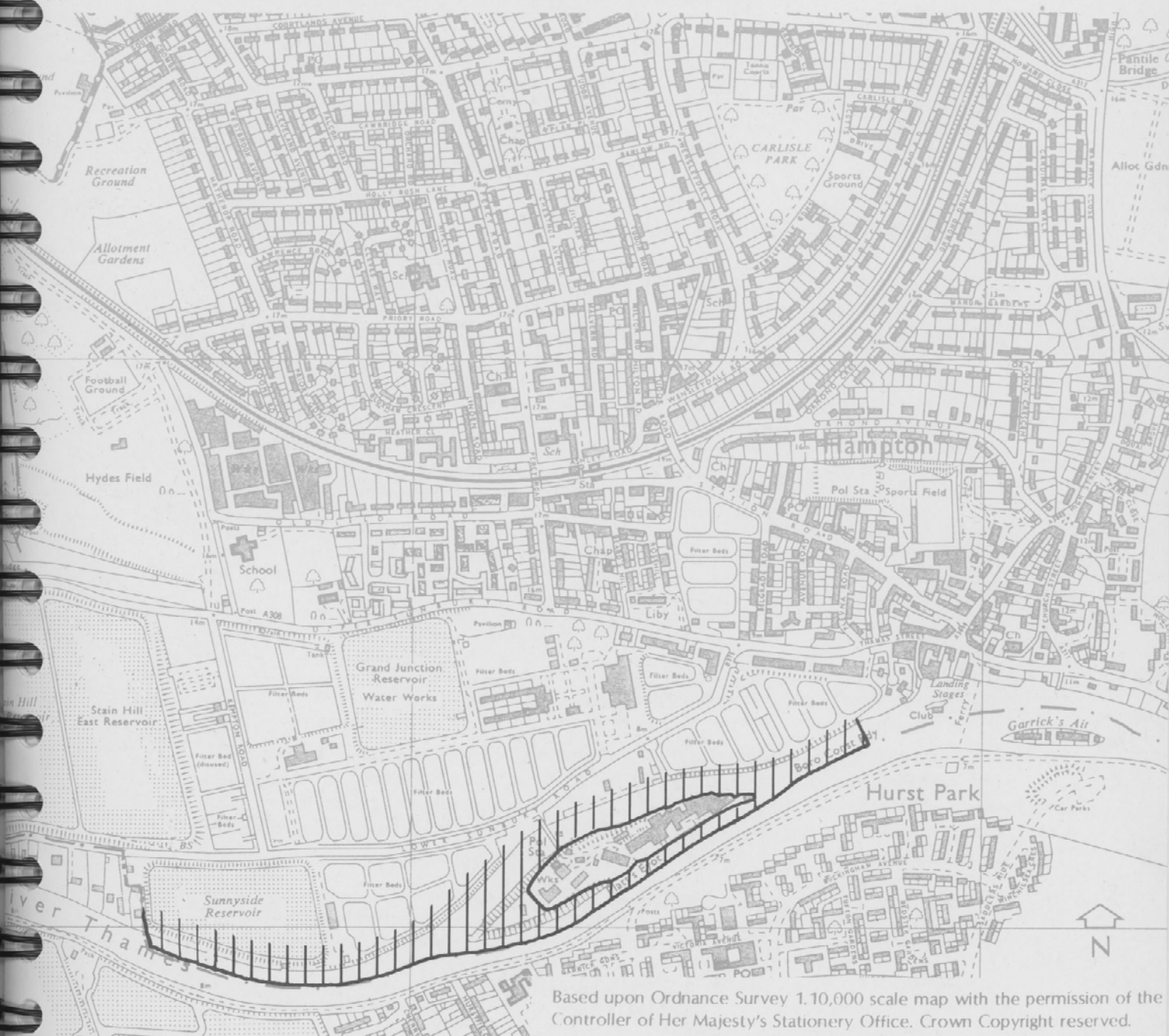
0 km 1 2 3  
0 miles 1 2

Scale 1:40,000



# Map 4

## MODIFICATION TO GREEN BELT BOUNDARY



— Green Belt boundary  
 |||| Area to be included in Green Belt

Richmond upon Thames  
 Unitary  
 Development  
 Plan

0 km 1/4 1/2 3/4  
 0 miles 1/4 1/2

Scale 1:10,000



# Richmond upon Thames

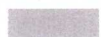
# Unitary Development Plan

## Proposals Map

### POLICY AREAS



Area of special character



Green belt



Metropolitan open land



Public open space

Other open land of townscape importance



Green Corridor



Conservation area



Site of special scientific interest



Other site of nature importance



Area which would benefit from tree planting



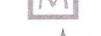
Vista / landmark



View



Scheduled ancient monument



Location which will benefit from environmental improvement



Area poorly provided with public open space



Area of mixed use



Key shopping frontage (see appendix B)



Secondary shopping frontage (see appendix B)



Primary / secondary road (see map 9)



Local distributor road / Crown Road



River Crane area of opportunity



River Thames protection



Area at risk from flooding



Surface water run-off control



Borough boundary

### Policy no:

ENV1

ENV4

ENV3

ENV5, REC1

ENV6

ENV7

ENV10

ENV16

ENV16

ENV8

ENV2, RIV1

ENV2, RIV1

ENV11

ENV33

REC2

EMP2, SHP9, STG4,  
HSG5, CET2

SHP2, SHP3, SHP6

SHP2, SHP7

TRN1

TRN1

RIV11

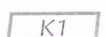
RIV5

RIV13

RIV14

Numbers in the key apply to policies in the written statement. All other policies in the written statement apply to the whole Development Plan area, unless specifically stated otherwise.

### SITE SPECIFIC PROPOSALS



Site



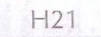
Junction



Route (footpath / cycle route / bridleway)



Road safeguarding line



Other transport

Letters refer to local areas defined in Chapter 13 (local strategies and Plan proposals) as follows: B Barnes. D Teddington & Hampton Wick. H Hampton & Hampton Hill. K Kew. P Ham & Petersham. S East Sheen & Mortlake. R Richmond. T Twickenham. W Whitton & Heathfield. Numbers refer to specific proposals.







the Royal Parks to schools, sports clubs and cemeteries. Envelopes to allow extensions have been provided around major buildings in metropolitan open land. However, the policy also recognises that there may be exceptional cases where it is appropriate to allow modest buildings or extensions, including structures on the river, which are related to the function of metropolitan open land and where this would not have a harmful effect on its character. So that it can be kept in predominantly open use, new uses will only be considered if they conserve and enhance the open nature and character of the metropolitan open land and maintain its nature conservation interest, are by their nature open or depend upon open uses for their enjoyment. Appropriate uses include:

- a) public and private open space and playing fields;
- b) agriculture, woodland and orchards;
- c) golf courses;
- d) allotments, nursery gardens, private gardens;
- e) cemeteries;
- f) nature conservation;
- g) rivers, reservoirs, lakes and other open water.

- 5.27 The Council will protect metropolitan open land as a habitat for wildlife and take opportunities, where possible, to increase its potential for wildlife. Views across open land are important. The Council will encourage enhancement of metropolitan open land where appropriate, e.g. by landscaping, removal or replacement of inappropriate fencing, screening, and seek to reduce the visual impact of traffic and car parking.

## ENV 2

## GREEN BELT

- 5.28 The Council will protect and enhance the green belt as shown on the proposals map. There will be a general presumption against inappropriate development. New buildings proposed on land adjoining the green belt will be required to have minimum visual impact when viewed from the green belt.

- 5.29 The green belt within the Borough is shown on Map 2. The main purposes of the green belt are:

- To check the unrestricted sprawl of the built up area.
- To safeguard the surrounding countryside from further encroachment.
- To prevent Greater London from merging with neighbouring towns or urban areas, and to prevent neighbouring towns from merging into one another.
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

- 5.30 Once green belts have been defined, the use of land in them should fulfil the following objectives:

- To provide access to open countryside and outdoor sport and recreational opportunities for the urban population
- To retain attractive landscapes, and enhance landscapes, near to where people live
- To improve damaged and derelict land around towns
- To secure nature conservation interest
- To retain land in agricultural, forestry and related uses

## MAP 2

# METROPOLITAN OPEN LAND GREEN BELT GREEN CHAINS & GREEN CORRIDORS

-  Metropolitan open land  
(policy ENV 1)
-  Green belt  
(policy ENV 2)
-  Green chains  
(policy ENV 6)  
for identification of areas see paragraph 4
-  Green corridors  
(policy ENV 20)
-  Potential links between green  
chains, including footpath links
-  Links to open land beyond  
Borough boundary
-  Borough boundary

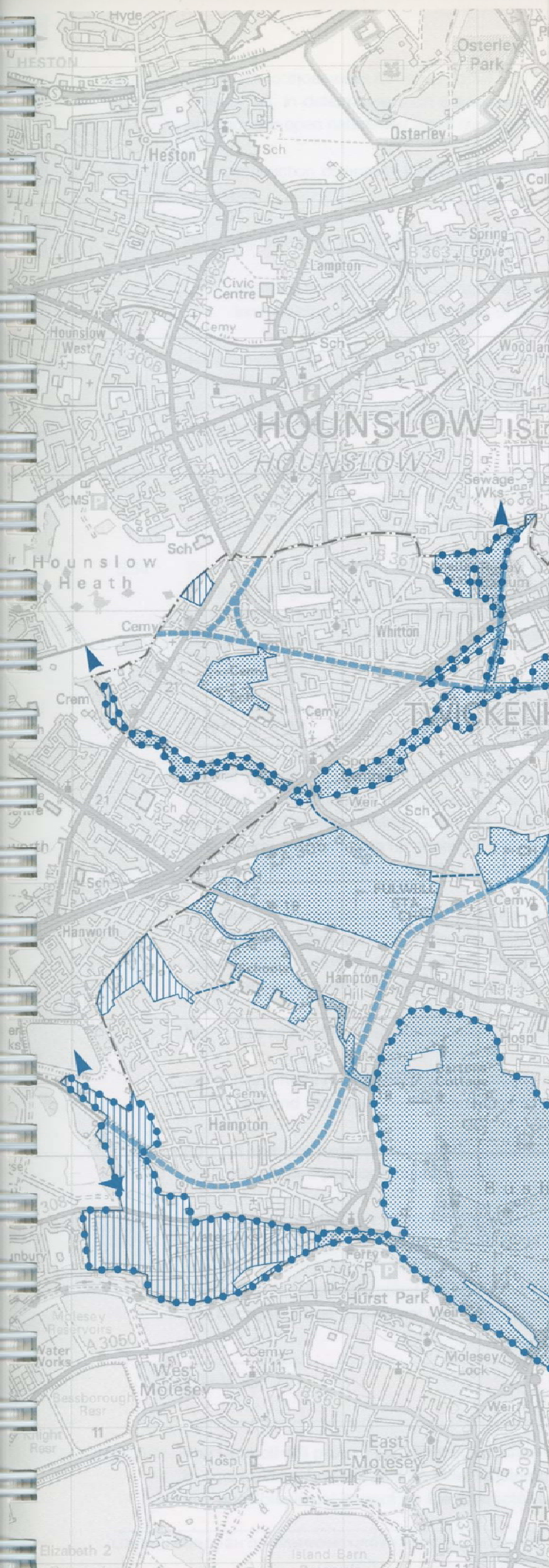
LONDON BOROUGH OF  
RICHMOND UPON THAMES  
Unitary  
Development  
Plan

ADOPTED MARCH 2005

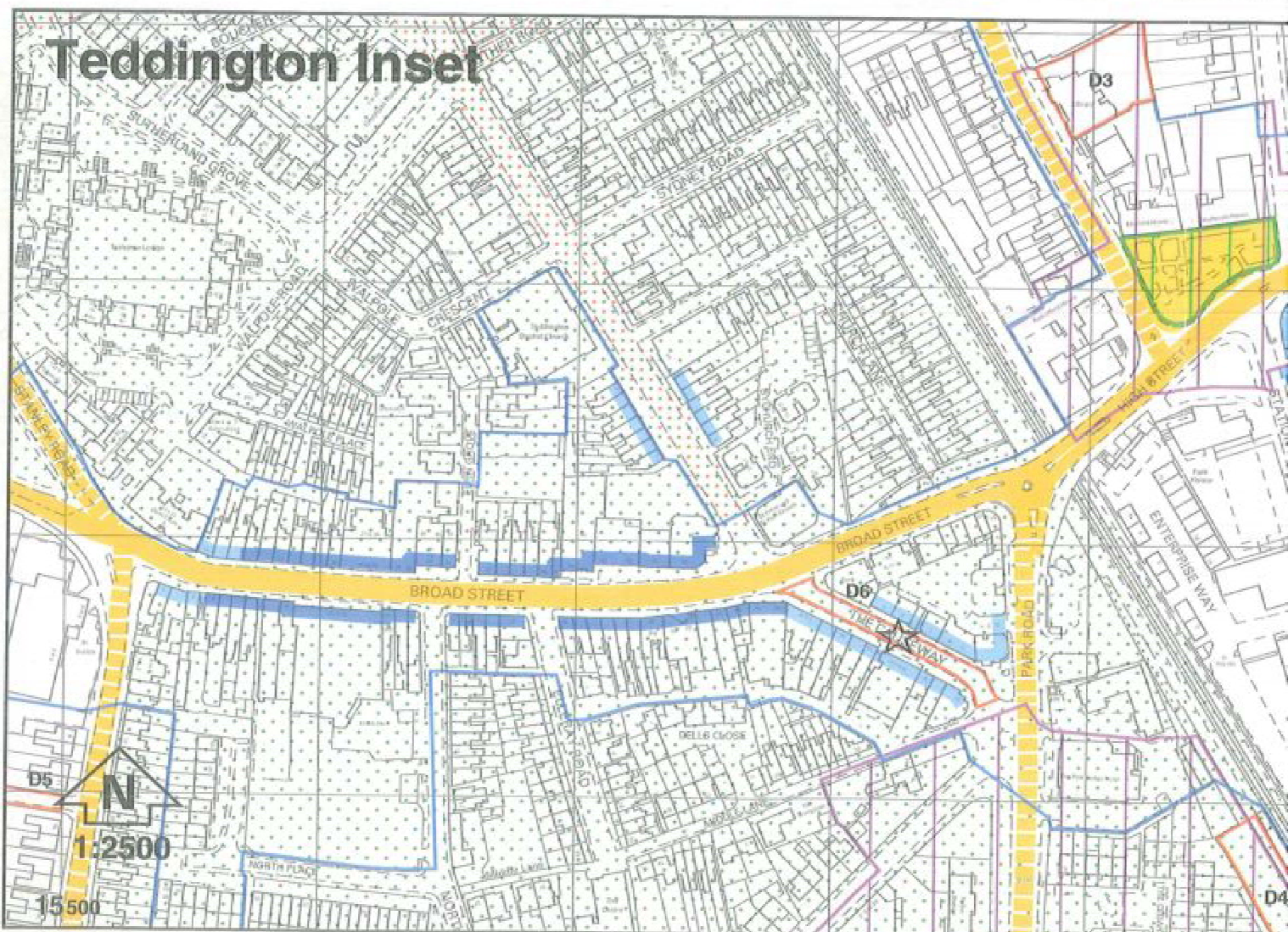
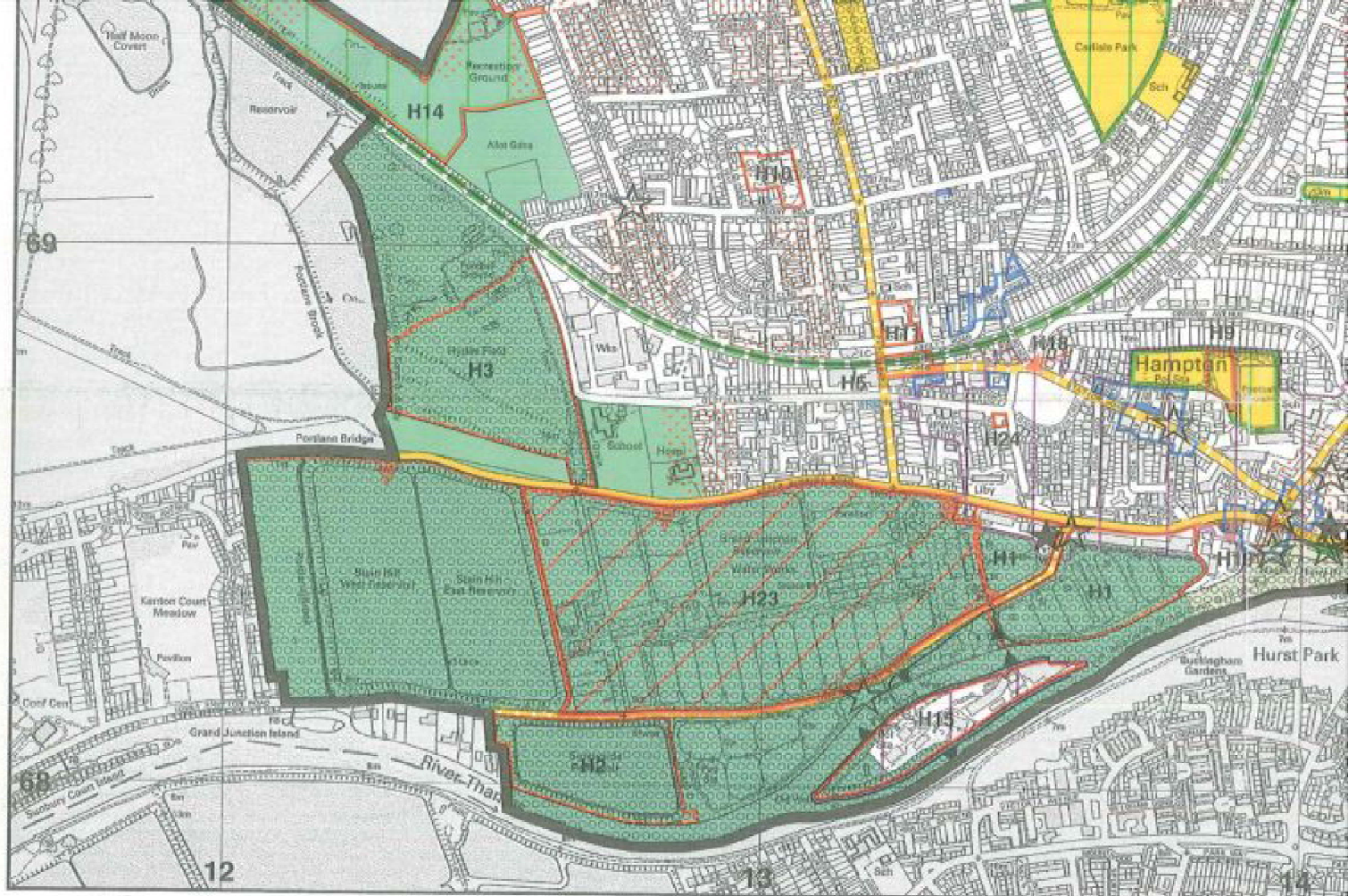
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0miles 1 2

Scale 1:40,000

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## **COUNSEL'S OPINION**

**From:** Kevin Leigh  
**Sent:** 13 February 2017 22:36  
**To:** davidharveytaylor@hotmail.com  
**Cc:** Andrew Bisbey  
**Subject:** URGENT: Richmond draft LP - land adj to Hampton reservoir - advice on GB boundary  
**Importance:** High

David,

Thank you for instructing me on this matter. You have asked me to review urgently your analysis of the historic GB boundary affecting your land beside Hampton reservoir and importantly whether the purported inclusion of your land within the GB by Richmond LBC is correct.

I have considered the documents you sent me and the draft comments you have shown me that you propose submitting to the review of the draft LP. I understand you are going to draw this to the attention of the Planning Policy Manager too. I think this is sensible since for the reasons set out below the council appears to have made a simple but obvious mistake.

I have tracked changes to your proposed submissions (attached herewith) and therefore do not propose to rehearse the arguments therein. I concur with the conclusion for the reasons I have adopted with the changes I have made. I note that Spelthorne's policy officer (in her email) also agrees that your land is outwith the GB.

In short, it is plain that Spelthorne BC designated the reservoir beside your parcel of land as GB. It did so notwithstanding that your parcel historically was owned by Thames Water (or whatever was its predecessor if different) as part of its ownership of the reservoir. The change in administrative boundaries in the early 1990s brought your land (and the whole of the reservoir) under the planning control of Richmond LBC. An analysis of the development plans over the years shows that the GB boundary was never altered so as to include your site by extending the coverage of the reservoir westwards. Instead the only change was southwards to include the Thames' foreshore. The comments I have revised explain what happened in detail.

The NPPF para 182 make clear that a LP must be sound. This is uncontroversial. While the guidance does not specifically deal with erroneous plans (since LPAs are expected to produce accurate and correct plans at all times) it is implicit in considering soundness that the base plan in a draft LP, whether for GB or indeed some other notation, should be accurate and correct since these are public documents that should be easily accessible and readable by anyone interested (not simply professionals). The current GB notation as per the erroneous plan obviously fails such test.

Furthermore, PPG para 110 states:

*The policies map should illustrate geographically the policies in the Local Plan and be reproduced from, or based on, an Ordnance Survey map. If the adoption of a Local Plan would result in changes to a previously adopted policies map, when the plan is submitted to the Planning Inspectorate for examination an up to date submission policies map should also be submitted, showing how the adopted policies map would be changed as a result of the new plan.*

The current policies, namely the GB as it can be traced from Spelthorne through to Richmond, has always excluded your land. There are currently no proposals to include it and arguably such change would not fall within the NPPF guidance anyway. The 2012 Regulations on LPs (referenced in the guidance) make clear that any changes to policies must contain a reasoned justification. The council has never proposed changing the historic GB belt to include your land so to suggest, if it were to be the council's case, that the GB washes over your land would be unlawful.

It follows that there is no basis for the council to assert that your site is in the GB. Aside from participating in the LP process (though I would hope that this error once explained will be readily corrected by the council) you could simply submit a planning application to the council. Any refusal based on GB policy and the site being GB (assuming all other planning matters are satisfied) could be appealed and the topic tested. While any advice I give you is confidential to you, you are free to disclose it if you wish. In this case, advance disclosure of the explanation of the council's error would be sensible and might avoid an appeal. If the council remains intransigent then assuming you succeed on appeal a costs application can be made for unreasonable behaviour by the council. A good case is not weakened by advance disclosure and therefore you may feel it appropriate to share my thoughts with the council. It is a matter for you but the advice from PINS on appeals is to be candid where costs are concerned and warn LPAs if an application might be made.

I know you have to make representations this week so I have kept my comments succinct. If anything is unclear, please don't hesitate to contact me.

Otherwise I wish you every success and hope you can sort this matter out shortly. I am sure the LP inspector and indeed the council have bigger issues to focus upon than a mistaken GB boundary.

KR

K

**Kevin Leigh**

No5 - London

clerks: 0845 210 5555

mobile: 07767 887344

direct: 020 7420 7553

email: [kl@no5.com](mailto:kl@no5.com)

skype: kevinleigh



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Bristol  
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Bristol BS1 4QS  
DX 7838 Bristol

Birmingham  
Fountain Court, Steelhouse Lane  
Birmingham, B4 6DR  
DX 16075 Fountain Court Birmingham

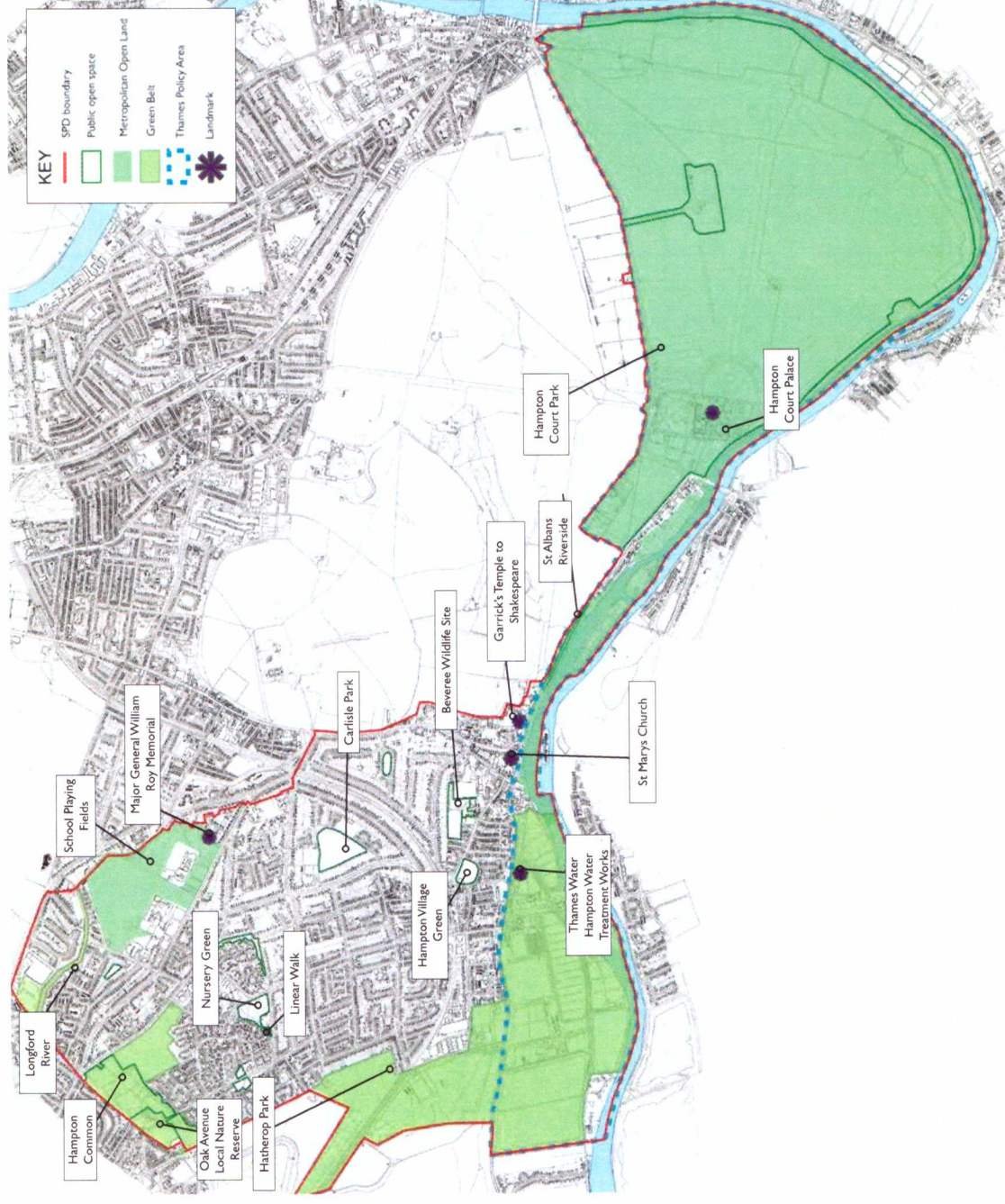
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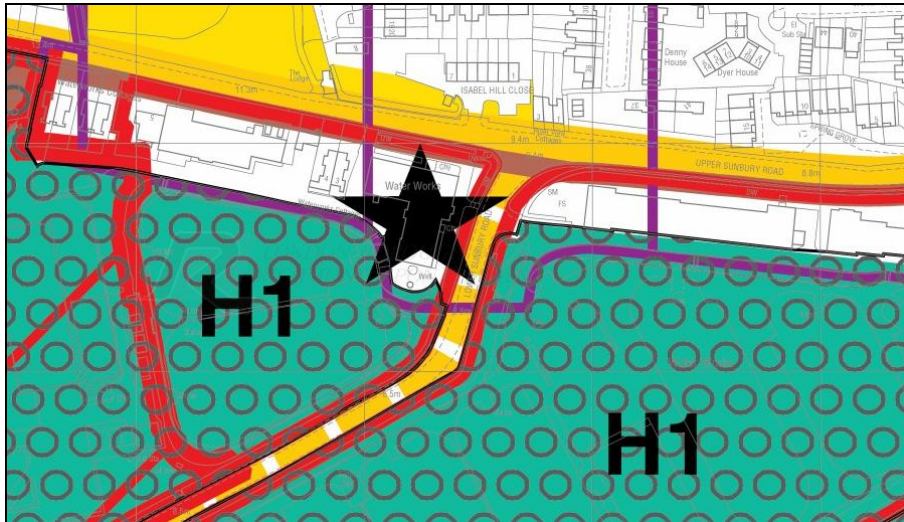
# Green Infrastructure in Hampton



Hatherop Park



Nursery Green





**RICHMOND BOROUGH – Pre Publication Consultation on the Local Plan, 4 January – 15 February 2017 – Site Specific Comments to Housing Allocations by Thames Water**

<b>Site ID</b>	<b>Site Name</b>	<b>Waste Response</b>
24141	Barnes Hospital, South Worple Way, Barnes	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
41238	Cassel Hospital, Ham Common, Ham	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
8088	Friars Lane Car Park, Richmond	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

49789	Ham Central Area, Ham	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
41228	Hampton Delivery Office, Rosehill, Hampton	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
49793	Hampton Square, Hampton	Due to the complexities of wastewater networks, the level of information available does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for the site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the wastewater infrastructure needs relating to the proposals in the Local Plan.

41227	Hampton Traffic Unit, 60-68, Station Road, Hampton	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
49790	Kew Biothane Plant, Mellis Avenue, Kew	The Kew Biothane plant is currently a Thames Water site. There are wastewater network capacity constraints in the area. Thames Water will be working with the developer to ensure that the foul flows from the development can be accommodated. Given the network capacity constraints we would recommend that the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what drainage infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure.
49786	Mereway Day Centre, Mereway Road, Twickenham	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
41237	Mortlake And Barnes Delivery Office, 2-12 Mortlake High Street, Mortlake	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

2016	Platts Eyot, Lower Sunbury Road, Hampton	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
2113	Richmond Station and above track, Richmond	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
14385	Rugby Football Union, Whitton Road, Twickenham	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
49792	St Michael's Convent, Ham Common	Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the wastewater infrastructure needs relating to the Local Plan.

2489	Stag Brewery, Lower Richmond Road, Mortlake	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
49785	Strathmore Centre, Strathmore Road, Teddington	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
41229	Teddington Delivery Office, 19 High Street, Teddington	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
49791	Telephone Exchange, East Sheen	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
49784	Telephone Exchange, High Street, Teddington	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.



**Site photographs**









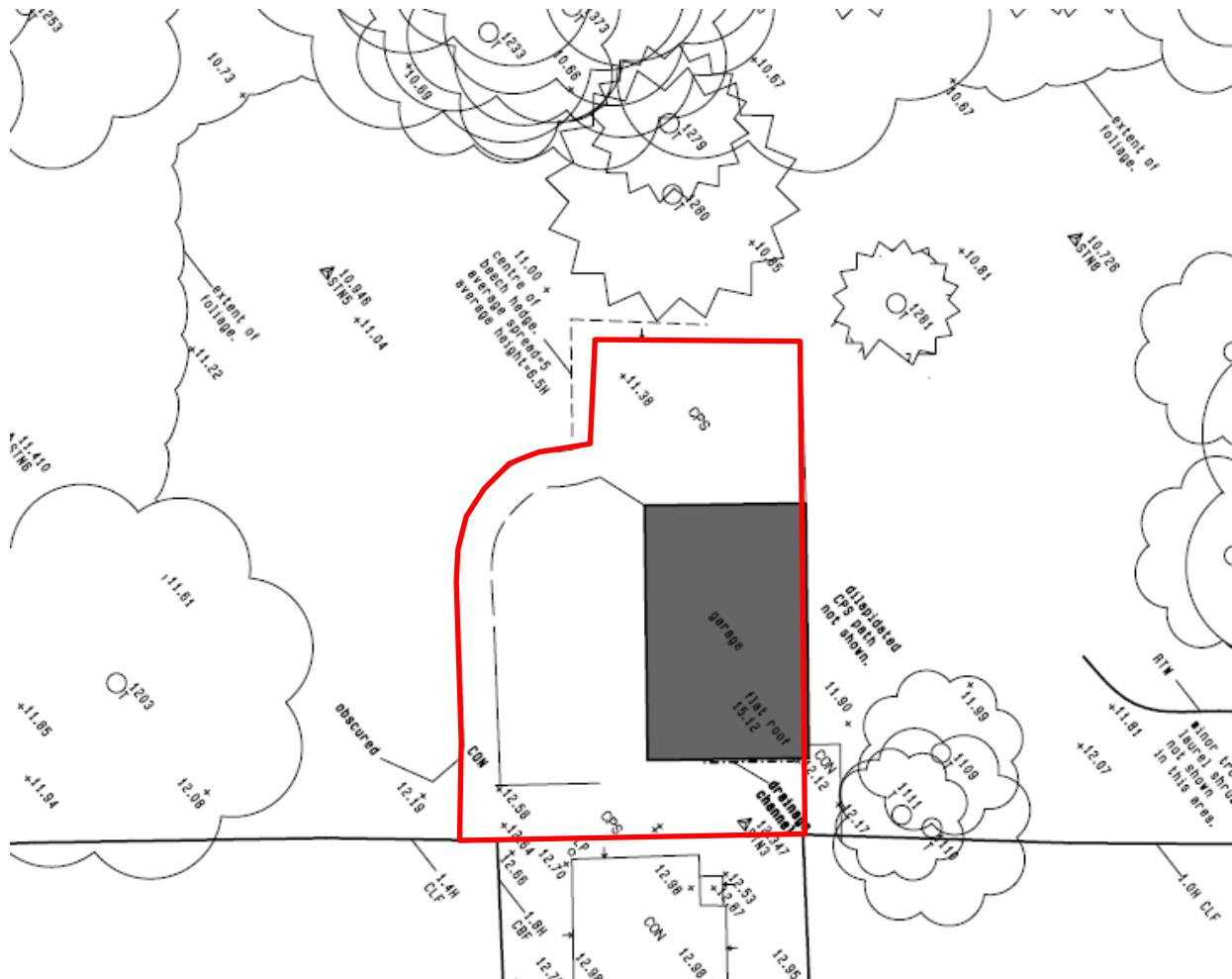
Current Local Plan – Proposals Map (Adopted in July 2015)





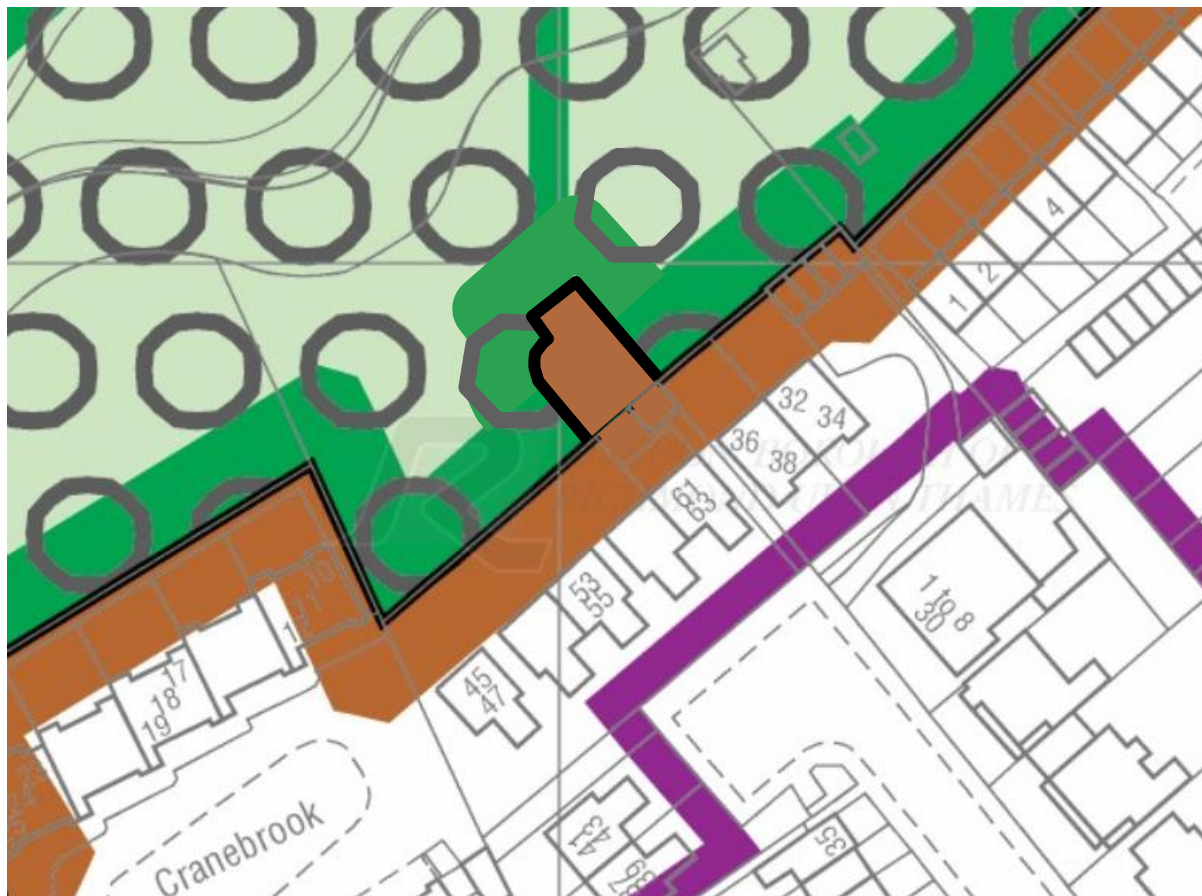
**Proposed change to the Proposals Map:**

**Area to be removed from “Metropolitan Open Land” and “Public Open Space” designations**





Local Plan – Proposals Map (Suggested)



**BY POST & EMAIL**

Philip Wealthy  
London Borough of Richmond upon Thames  
Planning Department  
Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ

24608/A3/GP  
14<sup>th</sup> March 2016

Dear Mr Wealthy,

**HAMPTON VILLAGE PLAN CONSULTATION**  
**REPRESENTATIONS ON BEHALF OF UK PACIFIC HAMPTON STATION LLP**

We write on behalf of our client, UK Pacific Hampton Station LLP, in respect of the London Borough of Richmond upon Thames (LBRuT) ("the Council") formal consultation on the 'Village Planning Guidance' for the Hampton Village area. Following a comprehensive period of pre-application consultation with the Council, we submitted a planning application (16/0606/FUL) for the redevelopment of the Former Hampton Traffic Unit, 60 to 68 Station Road ("the Site") on the 15<sup>th</sup> February 2016. The submitted application is for:

***Retention of former police station building with partial demolition of the rear wings of the police station, demolition of the rear garages, construction of 28 residential units (4 x 1 bed, 7 x 2 bed, 10 x 3 bed and 7 x 4 bed) and associated access, servicing, car parking, cycle parking and landscaping.***

On Page 14 of the document titled 'Introduction to Village Planning Guidance for Hampton' it states that the Hampton Traffic Unit is a potential development site for 'Employment generating and other commercial or social infrastructure uses, possibly including some residential'. ***We strongly object to this statement and indication of potential allocation/use*** for the reasons set out below.

**Pre-application Consultation & Advice**

Paragraph 188 of the National Planning Policy Framework (NPPF) (March 2012) encourages pre-application consultation and states that 'early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties'. Paragraph 191 goes on to add that 'the more issues that can be resolved at pre-application stage, the greater the benefits'.

The National Planning Practice Guidance (NPPG) has been published to support the NPPF and Paragraph: 001, Reference ID: 20-001-20150326 in the NPPG also highlights that applicants should engage in pre-application discussions to improve the efficiency and effectiveness of the planning application system.

The Metropolitan Police Service (MPS)<sup>1</sup> and our client has engaged in pre-application consultation with the Council, most recently during **October, November and December 2015**. ***The principle of residential redevelopment has been considered to be acceptable*** subject to demonstrating compliance with Development Management Policy DMS12.

We therefore consider the suggested use/allocation to be inconsistent with the pre-application advice received and not in accordance with the spirit of transparent and clear pre-application advice as advocated by the NPPF and NPPG.

### **Social Uses**

The Planning Statement and supporting evidence submitted with the planning application for the redevelopment of the Site (16/0606/FUL) provides a robust and comprehensive justification for the loss of social infrastructure on the Site. Our justification is set out below for ease of reference.

The London Plan (2015) recognises and advises that the loss of social infrastructure facilities may be acceptable where it is part of a programme of re-provision, which is the case here (as the classic police cars have been moved to Hendon). Paragraph 3.87A in the London Plan (2015) states the following: ***Loss of social infrastructure in areas of defined need may be acceptable if it can be demonstrated that the disposal of assets is part of an agreed programme of social infrastructure re-provision (in health and community safety, for example) to ensure continued delivery of social infrastructure and related services. (Our emphasis)***

LBRUT Core Strategy Policy CP16 Part C adds that the 'loss of community facilities will be resisted unless it can be shown that the facilities are no longer needed or that the services could be ***adequately re-provided in a different way or elsewhere***' (Our emphasis). The supporting text in paragraph 8.3.4.6 defines community infrastructure as:

- Public services;
- Community Centres;
- Public halls;
- Arts and cultural facilities;
- Policing, fire and ambulance services;
- Youth centres;
- Libraries; and
- Places of Worship.

LBRUT Development Management DMS12 also says that the loss of a community facility would be acceptable if evidence can be submitted to demonstrate that:

- 1) The existing facilities are no longer needed, do not meet the needs of users and cannot be adapted in any way; or
- 2) The existing facilities are being adequately re-provided in a different way or there are sufficient suitable alternative facilities in the locality; and
- 3) The potential of re-using the existing site for the same or an alternative social infrastructure use has been fully considered.

In March 2013, following statutory consultation<sup>2</sup>, the Police and Crime Plan 2013-2016<sup>3</sup> was published which outlined the Mayor's missions, priorities and objectives for tackling crime in

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<sup>1</sup> Note that pre-application advice was sought by Metropolitan Police Service as part of the disposal process and the pre-application received on the 4<sup>th</sup> July 2014 stated that "currently there is a need to address the loss of the existing and alternative community use. However, subject to this being suitable addressed, it is likely that residential use is acceptable".

<sup>2</sup> <https://www.london.gov.uk/priorities/policing-crime/police-and-crime-plan>

<sup>3</sup> <https://www.london.gov.uk/sites/default/files/PoliceCrimePlan%202013-16.pdf>

London. As part of this Plan it was noted that, at the time of writing, the MPS had 497 buildings, many of which provided unsuitable facilities to meet the service's operational requirements. In response to this, a Mayor's Office for Policing and Crime Estates Strategy 2013-2016 was compiled which outlined an action plan towards creating a more efficient MPS Estate to better and more efficiently meet the operational needs of the 21st century.

The Estate Strategy outlined the requirement for MPS assets to be safe, good quality and financially efficient to operate, with assets not meeting these requirements being disposed of as **"surplus to requirements"**. Older properties were a particular focus because they are typically harder to renovate and adapt and expensive to maintain. It was noted in the Police and Crime Plan that the Estates Strategy makes the provision for a reduction in the footprint of the MPS estate from 900,000 square metres to 600,000 square metres, with the disposal of up to 200 buildings.

Periodically between 2012 and 2015, applications were made to the Deputy Mayor for Policing and Crime (DMPC) by the MPS to approve "in principle" the disposal of MPS owned properties around London. This disposal programme was designed in such a way to ensure the MPS would meet the revenue saving targets outlined in the Police and Crime Plan.

In May 2013 the DMPC approved the "in principle" disposal of the Hampton Traffic Unit with the expectation that its sale would be complete in 2014/2015. ***However, it was noted that the sale of the unit was dependant on, and only acceptable with, the relocation of its teams to other buildings in the core MPS Estate (our emphasis).***

In March 2015, the MOPAC disposal schedule for 2014-2015 was published which listed those sites that, following being deemed surplus to requirements, were disposed of. This schedule notes that the sale of Hampton Traffic Unit was completed on 7<sup>th</sup> January 2015 indicating that, in accordance with the requirement of the DMPC, the teams residing in Hampton Traffic Unit had been fully relocated and reprovided elsewhere within the MPS Estate and the site was now redundant.

The Hampton Traffic Unit, whilst initially opened in 1905 as a publically accessible Police Station, had changed its form and function over the course of its working life. As noted in the MOPAC disposal schedule for 2014-2015, prior to closure the unit did not have public access or a Front Counter.

The sole purpose of the unit was to provide storage and maintenance space for classic police vehicles (not operational police vehicles). Therefore, it is our view that this ***does not fall under the definition of community infrastructure***. However, as expressed by Officers in the pre-application advice received on the 30<sup>th</sup> November 2015, the Council considers otherwise that regard should be had to Policy CP16 and DM S12.

The Hampton Traffic Unit was considered by the DMPC to be redundant and surplus to requirements due to its inability to contribute towards the objectives of the Police and Crime Plan. It was considered more viable to relocate the facility (storage of classic police cars/vehicles) provided to a driving school in Hendon rather than attempt to retain it. As noted above, this facility offered supporting infrastructure to the MPS but did not itself provide a direct public service. Therefore, the relocation of its function and the unit's subsequent disposal would not prejudice any existing community provision.

Following the decision to dispose of Hampton Traffic Unit, the Site was openly marketed by Knight Frank on behalf of MPS providing an opportunity for alternative uses to come forward (See Appendix H in the submitted Planning Statement). Given the requirements to restore and enhance the Building of Townscape Merit and address the onsite contamination, it is considered that an alternative non-residential use would not be viable. Irrespective of viability, it is also considered that a non-residential use in this particular location, on the periphery of the Village High Street

adjacent to existing residential properties, could result in significant traffic movements, harm to the conservation area and be detrimental to the amenity of surrounding residents.

In summary, there is demonstrable evidence of the MPS's strategies, plans and democratic processes for disposing of the Site. The traffic unit was no longer needed by the MPS as it failed to meet their needs. Its reprovision elsewhere, as advocated by the DMPC as a condition of its sale, would not adversely impact any existing community provision or call-out response times as the facility itself provided neither public access nor a public contact point and as traffic unit used for the storage and maintenance of classic police vehicles is not a community use. We therefore consider the suggestion of social infrastructure provision to be an unviable aspiration for the redevelopment of the Site.

## Employment and Commercial

The Site is not within an identified 'key office area' (this lies to the south east of the Site primarily around the junction between the High Street and Station Road) and the NLP Richmond Retail Study (2014) states the following:

*"8.15 The capacity projection suggests around 4,250 sq.m gross of Class A1 to A5 could be provided in other local centres/parades in the Borough. Over a third of this projection could be accommodated in vacant premises.*

*8.16 Mixed use allocations e.g. Hampton Square and Stag Brewery could meet most of the residual capacity. There is no need to identify further major development opportunities."*

The Council's own evidence indicates that the Site is not required for commercial/retail uses and that additional residents arising from the proposed redevelopment would help to support the long term sustainability of the existing shops and services within Hampton Village.

## Housing Delivery

The NPPF seeks to ensure that the supply of housing is significantly boosted and the Government and the Mayor of London are actively encouraging all public sector bodies to review their land assets and dispose of any surplus land in order to help address London's pressing housing needs.

We would highlight that London is in the midst of a housing crisis and the London Plan (2015) was primarily reviewed and updated to address key housing issues emerging from an analysis of census data released since July 2012, which indicate a substantial increase in the capital's population and an acute housing shortage.

The housing target for London has been increased to 42,389 and as set out in paragraph 3.16b in the FALP, the London-wide Strategic Housing Market Assessment indicates that London actually needs to deliver between 49,000 and 62,000 more homes a year and that "in light of the projected higher need, especially at the start of the plan period" the housing figures proposed ***"should be regarded as a minimum"*** (Our emphasis).

Given that the housing target for the Council is to be treated as a minimum it is considered that the site should be allocated for residential development to help significantly boosting the supply of housing in London and LBRuT.



## **Summary**

In summary, we strongly object to the suggestion that the Site should be developed for 'Employment generating and other commercial or social infrastructure uses, possibly including some residential'.

The Site has been deemed to surplus to requirements and released as part of a programme of re-provision by the MPS. The Site is not within an identified 'key office area' and the Council's Retail Study (2014) highlights that further retail floorspace is not required within Hampton. We therefore consider that the use of the Site should be updated to residential use in the Draft Hampton Village Planning Guidance when it is published later this year.

We trust that the comments above are helpful and clear and we would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact the writer if you have any queries or require any further information.

Yours sincerely,



**GREG PITT**  
Associate

CC. Chris Turnbull, Development Director, UK Pacific Hampton Station LLP  
Elliott Newell, Development Manager, UK Pacific Hampton Station LLP

Our recommended change is the deletion of the Sandycombe Centre from this list:

