



Local Plan Publication Consultation

From 9 June 2023 to 24 July 2023

RESPONSE FORM

The Council is inviting comments on the Publication version of the Local Plan.

The Local Plan sets out a 15-year strategic vision, objectives and the spatial strategy. The draft Plan includes place-based strategies covering the whole borough, along with accompanying site allocations, as well as the thematic planning policies that will guide future development in the borough. It will inform how growth will be accommodated across the borough. The draft Plan seeks to address future challenges including climate change, health, affordability and liveability.

This consultation is the final opportunity to comment on the Local Plan before it is submitted to the Secretary of State for independent 'examination in public'. At this stage in the plan-making process, in accordance with the national guidance, consultation responses should focus on whether the Local Plan has been developed in compliance with the relevant legal and procedural requirements, including the duty to cooperate, and with the 'soundness' of the Plan. Further detail on these concepts is provided in the accompanying guidance notes available on the website (via the link below).

How to respond

Please read the consultation documents and other background information made available on the Local Plan website: www.richmond.gov.uk/draft_local_plan_publication_version

You can respond by completing this form, either electronically using Word or as a print out, and sending it to the Council by:

- Email to LocalPlan@richmond.gov.uk
- Post a hard copy of the form to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ.

Alternatively, you can make comments on the draft Local Plan **online via our Consultation Portal**, which is accessible at the website listed above.

All responses must be received by 11:59pm on Monday 24 July 2023. The consultation is open to everyone; however please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

This form has two parts:

- Part A – Personal details and about you
- Part B – Your detailed response(s).

Part A: Personal Details		
	1. Personal Details *	2. Agent's Details (if applicable)
Title	Mr	Mr
First name	Danny	James
Last name	Murphy	Sheppard
Job title (where relevant)		Director - Planning
Organisation (where relevant)	LGC Ltd	CBRE Ltd
Address		████████████████████ ████████
Postcode		W1G 0NB
Telephone		██████████
E-mail address		james.sheppard@cbre.com

*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

The Council is committed to ensuring that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Council's Privacy Notice is published on the webpage www.richmond.gov.uk/data_protection

All responses will be held by the London Borough of Richmond upon Thames. 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.

If you submit comments, the consultation responses and your personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Response

3. To which part(s) of the draft Local Plan does your response relate to?

Please indicate the documents **and** the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents	<input type="checkbox"/>	Sections	
Publication Local Plan (including changes to the Policies Map designations)	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	10, 11, 21-25, 45
		Place-based strategy	7
		Site Allocation(s) no./ name	
		Maps	
		Tables	
Sustainability Appraisal Report	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach)	<input checked="" type="checkbox"/>	Urban Design Study, Local Housing Needs Assessment (July 2021), Employment Land and Premises Needs Assessment (Dec 2021)	

4. Do you consider the Local Plan is:

4.1 Legally compliant	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.2 Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.3 Complies with the Duty to Co-operate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Further information on these terms is included within the accompanying guidance note, which can be found on the website at www.richmond.gov.uk/draft_local_plan_publication_version

If you have entered 'No' to 4.2, please continue with Q5. Otherwise, please go to Q6.

5. Do you consider the Local Plan is unsound because it is not:

5.1 Positively Prepared	<input checked="" type="checkbox"/>
5.2 Justified	<input checked="" type="checkbox"/>
5.3 Effective	<input checked="" type="checkbox"/>
5.4 Consistent with national policy	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

Please see appended letter dated 24th July 2023

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified at 6 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

Please see appended letter dated 24th July 2023

Please continue on a separate sheet / expand box if necessary.

8. Do you consider it necessary to participate in examination hearing session(s)? (Please tick box as appropriate)

No, I do not wish to participate
In hearing session(s)

Yes, I wish to participate
In hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please continue on a separate sheet / expand box if necessary.

10. 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 Local Plan and other planning policy 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.

Signature:
For electronic responses a typed signature is acceptable.

James Sheppard

Date:

24th July 2023

24 July 2023

Spatial Planning and Design,
LB Richmond upon Thames,
Civic Centre,
44 York Street,
Twickenham,
TW1 3BZ.
LocalPlan@richmond.gov.uk

By Email Only

Dear Sir / Madam,

Consultation on the Draft Local Plan: Publication Version (Regulation 19) – July 2023

Re: LGC Ltd, Queens Road, Teddington, Middlesex, TW11 0LY

We write on behalf of our client LGC Ltd. (hereafter referred to as 'LGC') in response to consultation on the Local Plan Publication Version (Regulation 19), June 2023, hereafter referred to as the 'Publication Local Plan'.

We write to reinforce our previous advocacy, specifically relating to our representations to the Draft Local Plan Pre-Publication Version (Regulation 18) consultation, dated 31 January 2022, and in respect to the Direction of Travel consultation document and Call for Sites, dated 18th March 2020.

In addition, this consultation response follows various previous representations submitted to LBRuT on behalf of LGC, in respect of the now adopted Local Plan (July 2018 and March 2020). Previous representations presented to the Council on behalf of LGC were dated 15th February 2017, 18th August 2016 and 28th January 2016. These representations supported and promoted a mixed-use allocation at the site, including for a modern, fit-for-purpose headquarters premises, alongside much needed housing, including affordable housing.

6. Please give details of why you consider the Local Plan is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

We submit that the Publication Local Plan fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (NPPF). The plan has not been positively prepared taking into account the Borough's objectively assessed needs, is unjustified as it has failed to take into account reasonable alternatives, is ineffective as it would fail to be deliverable over the plan period and is inconsistent with regional (London Plan 2021) and National Policy.

In addition, there are crucial areas where the Publication Local Plan is not in compliance with the London Plan and cannot therefore be considered legally compliant.

Our Local Plan representations to date have promoted the redevelopment of the LGC site for a mix of employment and residential uses, through the introduction of a specific mixed-use allocation. A truly comprehensive mixed-use redevelopment of the site would secure a high-quality employment offer, accommodating new businesses and enhancing the investment potential in Teddington, whilst delivering affordable workspace and space for SMEs. This would result in a breadth of employment mix on site, re-providing and enhancing the existing net employment space on site.

It has been demonstrated through the preparation of an indicative scheme, presented to the Council, that redevelopment of the site can satisfy no-net loss of employment floorspace, provide a meaningful contribution to the Borough's housing land supply, whilst delivering a policy compliant number of affordable homes. It is well documented that the Council is severely lacking in respect to delivery of affordable homes. The indicative scheme also demonstrated how the site could be redeveloped to incorporate a sensitive design in respect to heights and massing, respond positively to its surrounding urban design context, whilst ensuring the inclusion of high-quality green space and landscaping, opening up the site to promote permeability and active travel.

In broad terms, an indicative scheme, when compared with net existing employment floorspace of c.10,000sqm, could include:

- Approximately 11,000sqm of new employment floorspace
- Approximately 279 homes, including up to 50 per cent affordable housing
- Active, outward facing site boundaries, integrating the site into the surrounding suburban context whilst enhancing site permeability
- Publicly accessible green open space.

Principle of Mixed-Use redevelopment

The site is currently under-developed, under-used and underoccupied. The effective use of this sustainable brownfield site would be assured through the development of a significant quantum of new

Grade A office/lab employment space. New, much needed employment floorspace would serve to provide accommodation for a range of occupiers including start-ups and expanding/relocating businesses within LBRuT. It would also be proposed for this to include a policy compliant level of affordable workspace.

In addition, new homes would not only serve to subsidise high-quality new commercial development on site, but also provide an appropriate means of delivering much needed affordable homes for the borough.

The Publication Local Plan, in **para 3.3**, sets out a series of strategic objectives. Notably these include the optimisation of land and resources by ensuring new development takes place on previously developed land and in sustainable locations; maximising the delivery of genuinely affordable homes by taking innovative and flexible approaches to deliver more affordable housing to meet the needs of Richmond's residents; reinforcing the role of Teddington where major new development should be focused in this sustainable location; providing a variety of opportunities for affordable and adaptable workspaces encouraging opportunities to work locally, whilst crucially increasing jobs and helping business to grow and bounce back following the pandemic.

A mixed-use development would successfully consolidate an inefficient and obsolete series of buildings and make more efficient use of the wider site, thereby increasing the numbers of jobs on site from approximately 250 to approximately 850, provide new high-quality space for incoming or expanding businesses, whilst providing approximately 150 new affordable homes. Crucially, a mixed-use proposal ensures a breadth and depth of planning benefit for the community of Teddington and the wider borough of LBRuT.

The supportive context for mixed-use redevelopment is reflected at national policy level. The National Planning Policy Framework (NPPF) actively seeks to promote effective use of land. **Paragraph 120** directs that planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed use schemes; give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs; and promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

A mixed-use allocation would truly serve to optimise the use of this highly sustainable brownfield site.

In our strong view, the site lends itself well to a mix of employment and residential uses. The site can provide for a comprehensively master planned, sustainable, mixed-use development that provides modern, fit-for-purpose employment spaces for new, expanding and relocating businesses and delivers much needed homes. Importantly, it is clear from the significant under-delivery of affordable housing that the site could serve as a productive and effective contributor to the Council's affordable housing land supply over the forthcoming plan period.

Employment

The Publication Local Plan proposes to designate the LGC site as 'Locally Important Industrial Land and Business Park' and a 'Key Business Area'. LGC understands the broad rationale of protecting these

employment sites to ensure a sufficient employment land supply across the borough over the plan period, as evidenced in **paragraph 4.19** of the Publication Local Plan.

However, we deem it crucial for the Council to further consider how these needs can be accommodated through mixed-use development. The indicative scheme as previously presented to the Council, illustrates how a highly inefficient, sustainably located brownfield site can be redeveloped to increase job numbers from approximately 250 to a possible 850. This would constitute a substantial windfall of employment generation for LBRuT, whilst simultaneously achieving other policy aspirations such as affordable housing delivery. A mixed-use development would also achieve a wide range of placemaking objectives.

Indeed, a well-considered mixed-use proposal would align with a number of key employment policies. **Draft Policies 21 and 23** seek to protect existing floorspace for office and industrial use, with a no net loss approach. It has been demonstrated through illustrative masterplans for the site, presented to the Council, that this can be achieved through a more efficient and effective use of land. **Draft Policy 21** goes on to promote the supply of affordable workspace to support small and medium sized enterprises, as identified in **draft Policy 25**, which would also be integrated into any mixed-use redevelopment scheme for the site.

We refer to adopted Policy LP40 (1) of the adopted Local Plan which, although seeking the broad protection of employment land, stating “land in employment use should be retained in employment use for business, industrial or storage purposes”, an allowance is made under exceptional circumstances for mixed-use redevelopment. Policy LP40 (4) states “mixed use development proposals which come forward for specific employment sites should retain, and where possible enhance, the level of existing employment floorspace”. **Policy wording for the draft plan should carry with it a degree of flexibility in exceptional circumstances, specifically as part of draft Policies 21, 23 and 24.**

Crucially, the potential for a co-location of uses on locally important industrial sites is allowed for under **London Plan Policy E7**. **London Plan Policy E7(B)** states that “Development Plans should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified”. **Policy E7(B)** goes on to state, “Intensification can also be used to facilitate the consolidation of an identified LSIS to support the delivery of residential and other uses”. The policy states that “this approach should only be considered as part of a plan-led process of LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated master planning process in collaboration with the GLA and relevant borough. In LSIS the scope for co-locating industrial uses with residential may be considered”.

LGC considers that any plan-led co-location of uses can be achieved whilst ensuring that those criteria set out in **Policy E7(D)** can be met.

In this respect, the Publication Draft Plan **is not legally compliant, nor sound.**

Affordable Homes

The adopted London Plan (March 2021) provides for a housing land supply requirement for LBRuT of 4,110 completions over a 10-year period. At a strategic level, the London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes across London per annum.

Indicative ranges have been included in **draft Policy 10** in a range of broad areas. Within 'Teddington and the Hamptons', a range of 900 – 1,000 new homes have been stated.

Notwithstanding **paragraph 17.6** of the Publication Local Plan that summarises the findings of the latest housing Annual Monitoring Report (November 2020), setting out that the borough is forecast to meet the strategic dwelling requirement over a ten-year period, LBRuT continues to suffer from a fundamental and longstanding under provision of affordable homes.

To successfully meet the Council's draft strategic vision every avenue should be explored to ensure the delivery of these affordable homes. The Council sets out in its strategic vision that by 2039, residents will have seen the impact of delivering new homes and an affordable borough for all, with a range of affordable housing having been delivered, with a future pipeline, supporting low and middle-income residents and workers into low-cost rent and home ownership options.

Specifically, targeted strategic objectives include the "maximisation of delivery of genuinely affordable housing across the borough through a range of measures, recognising the significant community benefits as a priority, and taking innovative and flexible approaches to deliver more affordable housing to meet the needs of Richmond's residents".

London plan Policy H1 sets out a range of measures that should be adopted to ensure housing targets are achieved, including for boroughs to "allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification". This is considered pertinent to the Council's significant affordable housing deficit. **Policy H1** goes on to require boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites through Development Plans, especially through sites with PTALS 3-6, or within 800m of a station or town centre boundary, and on industrial sites that have been identified through the processes as set out in **Policies E4, E6 and E7**. The potential of co-location of uses through **Policy E7** has been explored above.

Publication Local Plan Paragraph 17.13 confirms the borough's affordable housing delivery challenge, stating "due to the scarcity of land in the borough and other factors it is now experiencing an acute affordable housing crisis. Not enough affordable housing is being built to help alleviate the ever-growing need. Therefore, the Council will do everything in its power to make sure over the plan period we hit the 50 per cent target".

It follows therefore, that every possible option should be explored to ensure affordable homes are provided. This should include for a balanced approach to mixed-use development, whilst ensuring no-net loss of employment floorspace. **Paragraph 17.16** illustrates the strength of need still further by stating "the need for affordable housing in the borough is demonstrable, which has been evidenced by the Council's Local Housing Need Assessment (LHNA). The LHNA estimates a net annual need of 1,123 affordable rented and 552 affordable home ownership products to be provided between 2021-2039."

Paragraph 4.4.5 of the London Plan 2021 confirms that the London SHMA identifies that 65 per cent of London's need is for affordable housing.

There is clearly a critical, pressing need for delivery of affordable homes in the borough, to provide for the housing needs of residents and communities within Teddington, wider Richmond and Greater London.

One of the key issues that will serve to stifle future affordable housing delivery is that a such a large proportion of the Council's forecast housing delivery stems from the delivery of small sites. **The London Plan Table 4.2** confirms the large proportion of Richmond's 10-year housing target predicated on net housing completions on small sites as being 2,340. Affordable housing is very often difficult to provide on-site, as part of small site development. This often manifests in Payments in Lieu (PiL). Given the lack of available land to develop new affordable housing, PiL cannot easily and readily contribute to relieving the affordable housing crisis. The comprehensive development of larger sites is a tangible and effective way of delivering on site affordable housing, in locations where affordable housing is most needed. The risk of such a reliance on small sites and PiL, is that this is far less effective than providing strong provision, 'on mass', as part of larger site redevelopment.

In addition, importantly, **draft paragraph 17.9** of the Publication Local Plan notes there is a need to retain land in employment use but goes on to concede that "there may be limited potential for enabling housing gain on employment land if proposals comply with the requirements of Policies 23 and 24". As stated elsewhere in this consultation response letter, it is strongly considered that **draft Policies 23 and 24** should include an allowance for intensification or co-location within LSIS, to provide for a mix of industrial and residential uses, in line with **London Plan Policy E7(B)**.

Boroughs should be identifying and seeking to enable additional development capacity to supplement targets, thereby realising the true potential of brownfield housing capacity. The adopted London Plan makes it clear that making the best use of land means directing growth towards the most accessible and well-connected places. **Policy GG2** of the London Plan 2021 specifically directs the proactive exploration of potential to intensify the use of land to support additional homes and workspaces. This would involve the promotion of higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

Urban Design

Initial designs demonstrate that a net-gain in employment floorspace can be delivered on the LGC site, whilst simultaneously providing homes and a policy compliant level of much needed affordable homes.

Crucially, these aspirations can be delivered in a sensitive form that fully considers the surrounding urban design context. The site is wholly inefficient and there is an opportunity for the Council to support the site's comprehensive redevelopment, meeting a range of policy aspirations, in a considered form. Through technical assessment, including townscape, a range of low-mid height buildings of high-quality can be delivered.

The place-based strategy for Teddington and Hampton Wick, as presented in the updated ARUP Urban Design Study (2023), confirms the area as being home to significant assets in the science and life sciences sectors, including LGC, with the proximity of Teddington town centre and railway station providing good transport links into central London. The Urban Design Study designated the site within Character Area B2 – Teddington Residential (sub-area B2a).

The character area appraisal within the study broadly comments that the Teddington Residential area has a high sensitivity to change. Notably however, the appraisal confirms negative qualities that do not contribute to the character of the area. Primarily, it has been assessed that the large, gated complex of the National Physical Laboratory (including LGC) has a negative impact on the adjacent Coleshill and Blandford Roads, with metal fencing and blank facades. It was also commented that there a lack of

incidental green space in the locality. The urban design quality of the site and surrounds of LGC can therefore be demonstrably improved through considered redevelopment.

Through initial illustrative designs there is an opportunity to provide those incidental, publicly accessible green spaces, whilst opening the site up, becoming outward facing, connected with its surroundings and enhancing permeability through the site.

The B2 character area appraisal concludes by noting “the coarser urban grain and existing taller buildings in the area around the National Physical Laboratory (sub-area B2a) provides potential opportunity to accommodate development or intensification whilst addressing and improving some of the negative qualities”.

It follows therefore that although most of the borough is characterised by areas that have a high degree of sensitivity to change, the LGC site is one of the few areas that can accept change. It is strongly considered that any change through redevelopment in this sub-area, could be progressed in a form that is highly beneficial to the urban design context.

It is in this vein that we strongly consider that the site is appropriate for designation as suitable for ‘mid-rise’ buildings. It is acknowledged that the site’s location and proximity to sensitive landscapes, such as Bushy Park to the South, would preclude the site from being suitable for tall buildings.

However, given the site’s only ‘moderate sensitivity’ to change (as illustrated in **Figure 123 of the Urban Design Study 2023**), we would strongly advocate that sub-area B2a should be included as a ‘mid-rise building zone’. Mid-rise buildings are defined in the Publication Local Plan under **draft Policy 45**, as being “buildings which do not trigger the definition of a tall building but are 5 storeys or over (up to 6 storeys), or 15 metres or more from the ground level to the top of the building (whichever is lower)”.

Any future proposed redevelopment of the site for mixed-use, as demonstrated through an illustrative masterplan for the site, as presented to Council officers, could fulfil the criteria as set out in **draft Policy 45c**. Mid-rise buildings could be carefully located and designed to step down to surrounding existing and proposed buildings, namely Coleshill Road and Queens Road; would respond positively and protect the setting of existing buildings including heritage assets; respect the scale, width and proportion of adjacent streets and valued features; and deliver a varied and interesting roofline.

It is noted that **draft Policy 45d**, makes an allowance for mid-rise buildings outside of the identified mid-rise building zones where they are within or adjacent to areas which include buildings taller than the prevailing height. However, given the site’s assessed moderate sensitivity to change, we advocate for its inclusion as a mid-rise building zone. Indeed, **draft paragraph 22.30** concedes that further suitable sites for mid-rise buildings may become available, particularly those sites which allow for a comprehensive scheme with mid-rise at its centre while still integrating well with the locality, with lower height at the periphery to avoid imposing negatively on the surroundings.

In addition to the above, the conclusions reached in **section 4.2 of the Urban Design Study**, state that the LGC site has been assessed as having a relatively ‘low probability of change’. Through continued dialogue with the Council, it has been documented that the LGC site is no longer fit for purpose, is wholly inefficient and ineffective, and must change in the shorter term to ensure business and scientific needs are met into the future. As such, we consider this evidence to be incorrect and misleading. We have previously requested that this probability of change is increased to ‘high (shaded green)’.

Summary

In our strong view, the site lends itself well to a mix of employment and residential uses. The sustainably located, brownfield site can provide for a comprehensively master planned, mixed-use development that provides new employment space for new, expanding and relocating businesses and delivers much need homes. Importantly, it is clear from the continued under-delivery of affordable housing that the site could serve as a productive and effective contributor to the Council's affordable housing land supply over the forthcoming plan period. In addition, redevelopment could successfully activate the street scene, provide new high quality publicly accessible green spaces, enhance permeability and promote active travel, be outward facing and connect with the local urban design vernacular.

It is for the reasons as set out above that we consider the plan to be currently unsound and not legally compliant.

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified at 6 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

Modifications to ensure the Local Plan is Sound and Legally Compliant:

1. **Mixed-use Site Allocation to be included** (employment and residential) for LGC Ltd, Queens Road, Teddington, Middlesex, TW11 0LY
- For the reasons as set out above
2. **Publication Draft Policies 21, 23 and 24 to include allowance for intensification/co-location of industrial and residential use (mixed-use), as per the London Plan provision made in London Plan Policy E7(B).**

London Plan Policy E7(B) states that "Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified (...). Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications. In LSIS (but not in SIL) the scope for co-locating industrial uses with residential and other uses may be considered. This should also be part of a plan-led or masterplanning process".

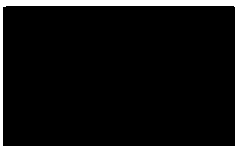
Therefore, we strongly consider that **draft Policies 21, 23 and 24** should include provisions for the co-location of industrial and residential uses as part of the plan-led process, potentially through the intensification of development sites.

In addition, **Draft Policy 24** allows for little flexibility, constraining the Council's ability to consider high-quality mixed-use schemes that deliver increases, both qualitatively and quantitatively, to employment floorspace, along with other planning and public benefits. The wording of **draft Policy 24(A)** states a "presumption against loss of industrial land", continuing, "proposals which result in a net loss of industrial land will be refused". We urge the Council to promote more flexible wording through draft Policy 24, that ensures no net loss of industrial floorspace and promotes net increases where feasible. This flexibility could be allowed for through deletion of "~~Proposals which result in a net loss of industrial land will be refused~~". It can be demonstrated through intensification, and a more efficient and effective use of land, that mixed-use developments can come forward in appropriate locations that lead to net increases in industrial floorspace, whilst meeting other policy aspirations.

3. Mid-Rise Building Zone: sub-area B2a should be included as a 'mid-rise building zone'.

Should you wish to discuss this matter in more detail, please do not hesitate to contact me.

Yours faithfully



JAMES SHEPPARD
DIRECTOR – PLANNING

CBRE Limited for and on behalf of LGC Ltd.