



21 September 2017

Charlotte Glancy
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Dear Charlotte,

**LONDON BOROUGH OF RICHMOND – LOCAL PLAN EXAMINATION:
GREGGS BAKERY, GOULD ROAD, TWICKENHAM, MIDDLESEX TW26RT**

On behalf of our client, Greggs PLC, we are pleased to provide a summary of the additional statements submitted to the Local Plan Examination.

The additional statements are as follows:

- Protected Employment Land and Site Allocation Review (provided in two parts due to size)
- Economic Benefits Statement
- Employment Land Evidence Critique
- Financial Viability Report

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.

The additional statements relate to matters raised in representations made on behalf of Greggs to previous draft development plan consultations, dating back to January 2013. The additional statements should be read in conjunction with these representations. We have set out justification for the submission of additional reports and how each of the reports relate to the matters raised previously below.

Protected Employment Land and Site Allocation Review

The representations made on behalf of Greggs to the Local Plan: Publication Consultation raised concerns about the lack of consistency by the Council in the approach to site allocations. The representations, at pages 13 and 14, identified a number of examples where there was a clear lack of consistency in the approach taken by the Council.

The Protected Employment Land and Site Allocation Review provides a more detailed review of all proposed site allocations and Locally Important Industrial Land and supports the conclusions of the previous representations. The broad findings of the assessment also support the Borough's own evidence base assessment (Employment Sites & Premises Study, 2017). Both pieces of work clearly identify Greggs' landholding at Gould Road as one of the poorest quality employment sites in the Borough.

In light of this research Colliers International is of the view that the Borough's Publication Local Plan cannot be considered "sound" for the purposes of the National Planning Policy Framework (NPPF), in terms of the proposed protection of industrial uses at the Greggs bakery site.

Economic Benefits Statement

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 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.

The benefits of a mixed-use residential-led scheme on the site are outlined at section 4.4.3 of the representations made to the Local Plan: Pre-Publication consultation in August 2016. These benefits are also outlined again throughout the representations made to the Local Plan: Publication Consultation in February 2017. The Economic Benefits Statement submitted to the Examination in Public links to previous representations and provides further evidence to demonstrate that the redevelopment of the Greggs site to provide a mixed-use scheme will generate a wide range of direct indirect and catalytic economic effects. The allocation of the Greggs site for industrial use is therefore in complete contradiction to the evidence which has been provided by the Council.

Employment Land Evidence Critique

The Employment Land Evidence Critique draws upon the high level review of economic evidence presented within the 2016 Employment Land Assessment prepared by Lichfields, and submitted as part of the representations made in response to the Local Plan: Pre-Publication consultation in August 2016. The Employment Land Evidence Critique adds to this by providing a more detailed review and critique of the Council's evidence base on economic growth and employment land matters that has been prepared to support the new Local Plan.

It also considers a number of evidence base documents which have been prepared and published since the 2016 Assessment was undertaken, notably the Employment Sites & Premises Study 2016 Update and Employment Sites & Premises Study 2017 Update, both prepared on behalf of the

Council by Peter Brett Associates. It concludes that the emerging Plan cannot be considered “Sound” at Examination without amendment. This is, in particular, because the evidence used to support the proposed protection of the site is not justified, effective or consistent with national policy.

Financial Viability Report

The Financial Viability Report demonstrates that the Greggs site is no longer suitable for industrial use and provides detailed appraisals which confirm the assumptions made by Steve Mitchell in the specialist advice provided at page 11 of the representations made to the Local Plan: Pre-Publication consultation in August 2016.

The report concludes that a residential-led redevelopment option would be viable and therefore also deliverable, whilst an industrial scheme would not. The implication is that the site should not be protected for industrial purposes on the basis that no future purchaser could viably redevelop the site for industrial purposes. The evidence therefore demonstrates that the emerging Plan cannot be considered “sound” at Examination.

Summary

In light of this research Colliers International is of the view that the Borough’s Publication Local Plan cannot be considered “sound” for the purposes of the National Planning Policy Framework (NPPF), in terms of the proposed protection of industrial uses at the Greggs bakery site.

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.

We trust that the additional statements will be considered alongside the representations previously made on behalf of Greggs, and welcome the opportunity to participate in the Local Plan Examination.

Yours sincerely,



**Leigh Thomas
For and on behalf of Colliers International**