

Andrew Seaman BA (Hons) MA MRTPI
c/o Charlotte Glancy
Banks Solutions
Flat 3 Stanmore House
118-120 High Street
Billingshurst
RH14 9QS
bankssolutionsuk@gmail.com

22 September 2017

By Email Only

Dear Mr Seaman,

Richmond upon Thames Local Plan Examination in Public
Re: LGC Ltd, Queen's Road, Teddington – Proposed Mixed-Use Allocation

Relevant Hearing Sessions:

- **Housing** – 27 September 2017 and 28 September 2017 (PM)
- **Borough Centres and Employment/Economy** – 11 October 2017 (AM)

Thank you for the opportunity to prepare a written statement on behalf of our client LGC Ltd.

This statement follows the submission of three previous written representations to London Borough Richmond upon Thames (LBRuT), in respect of the emerging Local Plan. These were submitted 28 January 2016, 18 August 2016 and 15 February 2017 (Appendix 1). In addition, on 28 June 2016 the site was also submitted to the GLA London SHLAA for consideration.

Previous representations have sought to make the case for a mixed-use allocation for employment and residential use at the site, allowing for enabling development to support the LGC Ltd. business into the future.

The draft Local Plan seeks to protect the overall LGC Ltd. site as 'Locally Important Industrial Land and Business Park' and 'Key Office Area'. We strongly advocate the release of the site from this protective employment allocation, given that a mixed-use allocation would allow for both the retention of a nationally significant employer in Richmond, alongside the provision of much needed housing land for the borough.

LGC Ltd. is seeking a mixed-use allocation to support the development of a new fit-for-purpose facility, financed through the release of part of the site for residential development. The existing facility no longer meets the needs of this modern, high-technology, knowledge-based employer.

Notably, LBRuT fully recognise the importance of retaining LGC Ltd. within the borough as has been highlighted in the publication version of the Local Plan, paragraph 10.1.4. This paragraph 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).

It is our strong view that this supportive draft policy wording should proactively facilitate the modernisation of LGC Ltd. premises, sustaining the business and ensuring the retention of a skilled workforce in the borough. LGC Ltd. has a longstanding ability to attract and retain highly skilled employees specialising in the life sciences market. There are a broad range of socio-economic benefits to ensuring this remains the case.

There is a compelling case for enabling development in this instance, whereby LGC Ltd. can continue to reside and operate its headquarters from the borough in the years to come, retaining highly skilled employees within a renowned and growing business of both national and global significance.

In addition to LGC Ltd.’s requirement for a modern, fit-for-purpose facility financed through enabling development, there exists also a critical need for sustainable, deliverable housing land to come forward for development in LBRuT. To avoid repetition, we would direct you to representations dated 18 August 2016 (also appended to this statement). This evidences the high level of residential need and the overall lack of housing land supply in the immediate term.

In summary, a proportion of the site is no longer required by LGC, whilst the facility requires substantial modernisation and structural change. Considering 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.

Given the evidence presented through submission of representations dated 28 January 2016, 18 August 2016 and 15 February 2017, alongside this written statement, we strongly consider the draft Local plan in its current form **unsound**. We would as such welcome a **main modification** to the draft Local Plan, introducing a mixed-use allocation across the LGC Ltd. site.

We trust that the above comments are helpful in the context of the Local Plan Examination in Public.

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

APPENDIX

Previous Representations

Planning Policy, LB Richmond
Civic Centre, 44 York Street
Twickenham
TW1 3BZ
LocalPlan@richmond.gov.uk

15 February 2017

By Email Only

Dear Sir / Madam,

Consultation on the Publication version of the Local Plan

Re: LGC Ltd. draft Mixed-Use Allocation –Publication version of the Local Plan Consultation February 2017

We write on behalf of our client LGC Ltd. This response to consultation on the Publication Version of the Local Plan follows representations submitted on behalf of LGC Ltd, in respect of previous iterations of the Local Plan, dated 28th January 2016 and 18th August 2016. In addition, on 28th June 2016, the site was submitted to the GLA London SHLAA for consideration.

It should be noted that, as identified within previous representations, LGC Ltd site is incorrectly identified within the publication draft plan, under the demise of 'National Physical Laboratory' under 10.2.9 on p135.

These representations do not seek to repeat comments made previously, notwithstanding the three 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. We note that the publication version of the Local Plan seeks to protect this site as a 'key office area' and 'locally important industrial land and business park', thereby preventing any net loss of office floorspace. We strongly advocate the release of the site from this protective employment allocation, given that a mixed-use allocation would allow for the retention of a nationally significant employer in Richmond, whilst actively contributing to the housing land supply of the borough.

Ultimately, LGC Ltd can only continue to operate from within London Borough Richmond upon Thames (LBRuT) if enabling residential development can be progressed on part of the site to cross-subsidise the development of a new fit-for-purpose facility.

Previous representations make the case for mixed-use development on the LGC Ltd site, allowing for the development of a new, fit-for-purpose building that meets the current needs of this modern, high-technology, knowledge-based employer.

The importance of retaining LGC Ltd within the borough has been highlighted within the 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).

Given the above draft policy wording, LGC Ltd would welcome the support of the Council to enable the continued operation and retention of LGC in the borough. Clearly, this must facilitate, whenever reasonably required, the modernisation of such business’ facilities in order to successfully sustain critically important employers such as LGC Ltd.

There are important benefits for supporting the retention of LGC Ltd including its longstanding ability to attract and retain highly skilled employees specialising in the life sciences market. Indeed, a considerable proportion of employees based at LGC Ltd headquarters in Teddington are highly-skilled.

It is broadly accepted that a borough’s ‘stock’ of high skilled workers is one of the key determinants of its economic performance. Thriving local economies require a local workforce with high levels of employability. It should be that employment and skills are drivers of local economic growth. A motivated, flexible, and skilled workforce attracts employers and boosts productivity.

Aside from the demonstrable economic benefits there are also a broad number of social and demographic benefits. Indeed, without opportunities for skilled work, the local authority will risk an ageing workforce as young people will ultimately relocate from such an area in search of higher skilled work, training and other benefits elsewhere.

It is clear that LGC Ltd contribute economically to LBRuT, however, it is not solely the economic value that is important, but also the global reputation of scientific excellence that it provides within the life sciences sector, which is associated of course with LBRuT.

There is a compelling case for enabling development in this instance, whereby LGC Ltd can continue to reside and operate its headquarters from the Borough in the years to come, retaining highly skilled employees within a renowned and growing business of both national and global significance.

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 and can be taken into full account during the publication stage of the emerging Local Plan.

Given the information and justification presented through the submission of representations (dated 28th January 2016, 18th August 2016 and 15th February 2017) to the Council, we strongly consider that the publication version of the Local Plan in its current form is unsound.

In addition, we would request that CBRE Limited, representing LGC Limited, should be granted adequate opportunity to present the case for mixed-use allocation at Examination in Public.

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

LGC Limited

Queens Road
Teddington
Middx TW11 0LY

tel. 020 8943 7000
fax. 020 8943 2767

Drawing Title

LGC Estate

Drawing Number

LGC-99-BS20-001

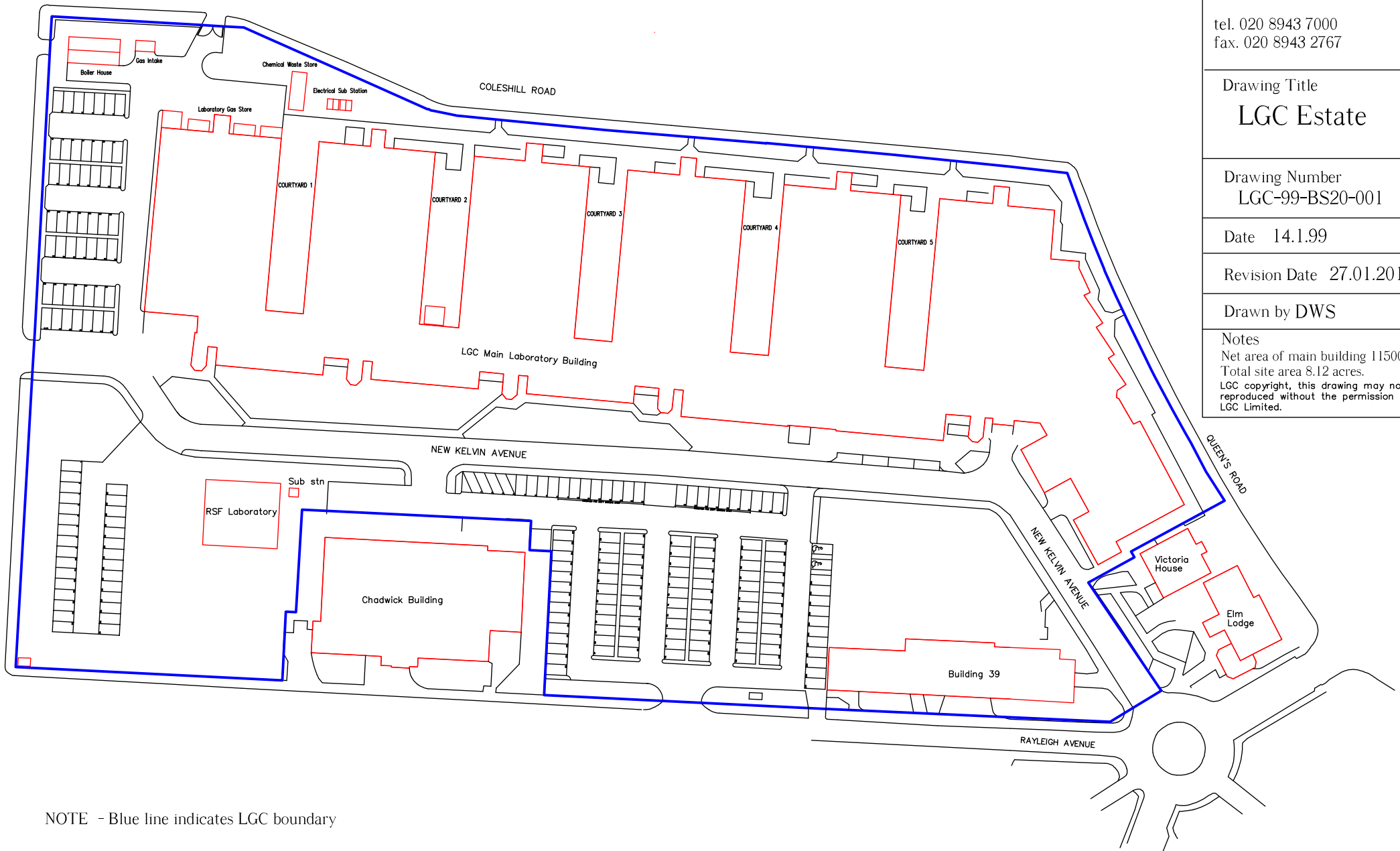
Date 14.1.99

Revision Date 27.01.2016

Drawn by DWS

Notes

Net area of main building 11500 m2.
Total site area 8.12 acres.
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reproduced without the permission of
LGC Limited.



NOTE - Blue line indicates LGC boundary

Planning Policy, LB Richmond
Civic Centre, 44 York Street
Twickenham
TW1 3BZ
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

LGC Limited

Queens Road
Teddington
Middx TW11 0LY

tel. 020 8943 7000
fax. 020 8943 2767

Drawing Title

LGC Estate

Drawing Number

LGC-99-BS20-001

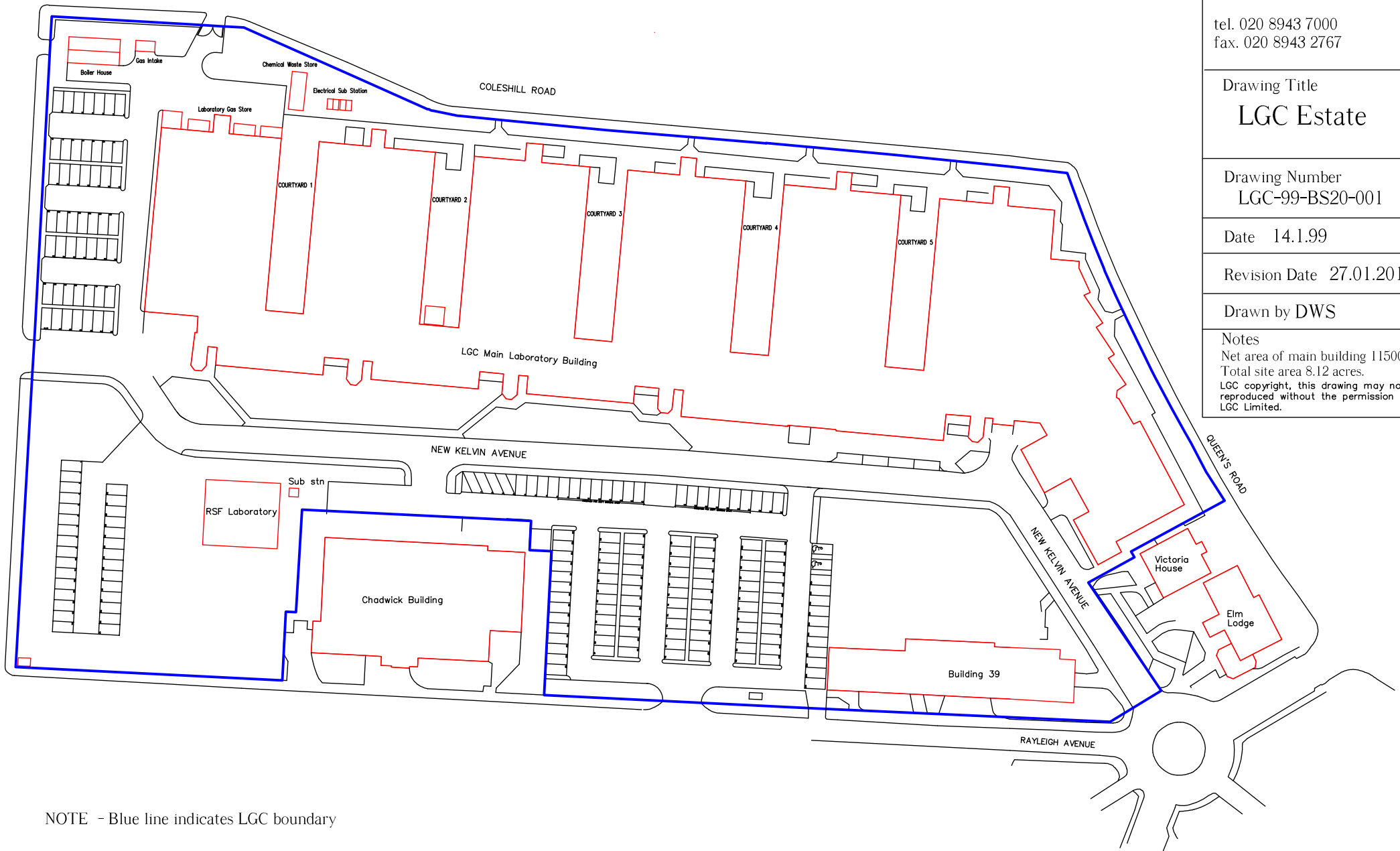
Date 14.1.99

Revision Date 27.01.2016

Drawn by DWS

Notes

Net area of main building 11500 m2.
Total site area 8.12 acres.
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LGC Limited.



NOTE - Blue line indicates LGC boundary

CBRE Limited
Henrietta House
Henrietta Place
London W1G 0NB

Switchboard +44 (0)20 7182 2000
Fax +44 (0)20 7182 2001
Direct Line +44 (0)20 7182 2752
jonathan.stoddart@cbre.com

28th 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



JONATHAN STODDART
DIRECTOR