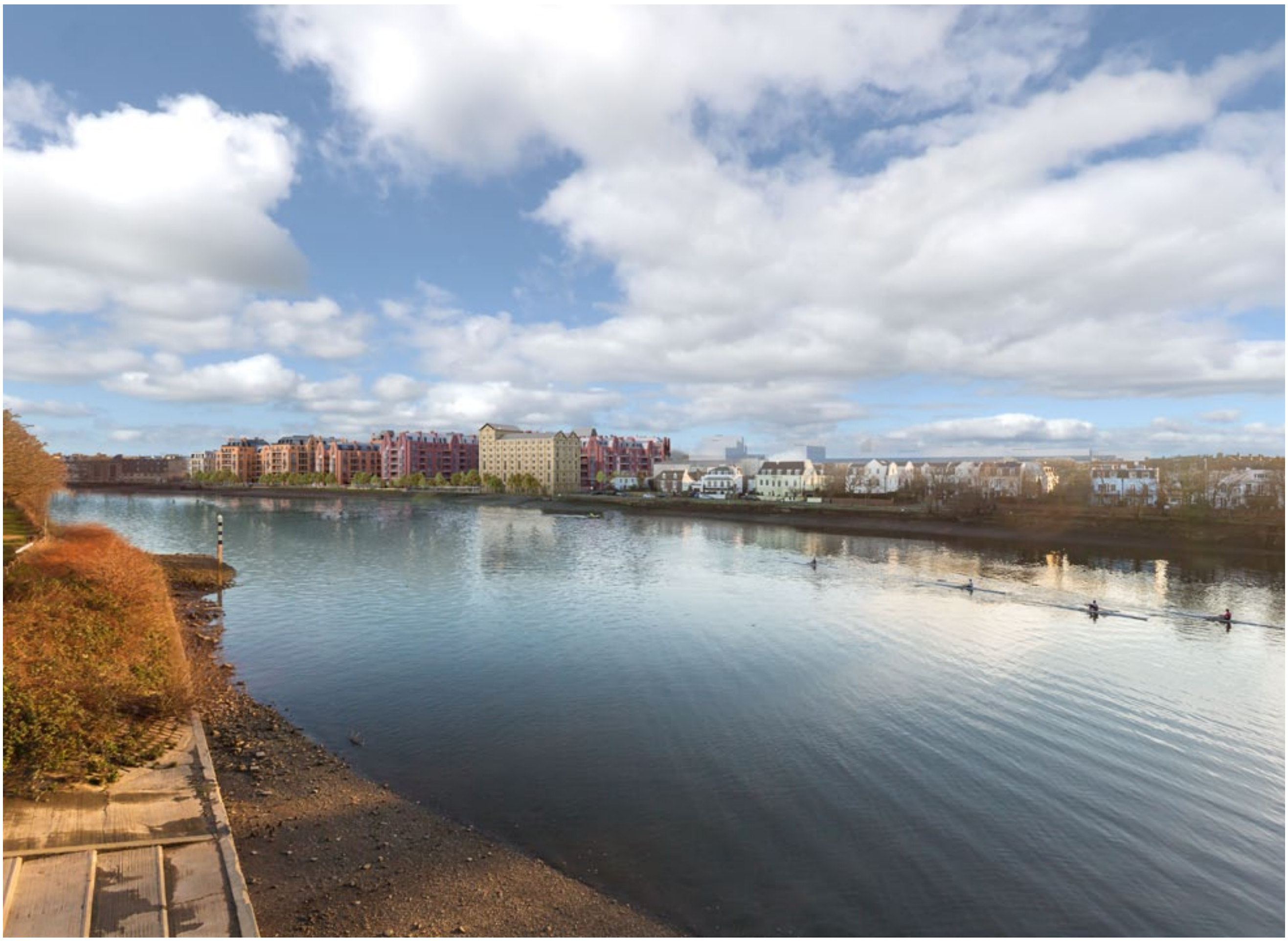

Stag Brewery, Mortlake

Retail and Leisure Statement

For Reselton Properties

February 2018

Retail and Leisure Statement

In respect of

Former Stag Brewery, Mortlake

On behalf of

Reselton Properties Limited

RPS Ref: JCG23233

February 2018

Secure & Stable
ADDING VALUE

QUALITY MANAGEMENT

Prepared by:	**PA**
Authorised by:	**PA**
Date:	**February 2018**
Project Number/Document Reference:	**JCG23233**

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1 INTRODUCTION

1.1 This Retail and Leisure Statement has been prepared by RPS on behalf of Reselton Properties Limited (ôthe Applicantö) in support of three linked planning applications for the comprehensive redevelopment of the former Stag Brewery Site in Mortlake (ôthe Siteö) within the London Borough of Richmond Upon Thames (ôLBRuTö).

1.2 The former Stag Brewery Site is bounded by Lower Richmond Road to the south, the river Thames and the Thames Bank to the north, Williams Lane to the east and Bulls Alley (off Mortlake High Street) to the west. The Site is bisected by Ship Lane. The Site currently comprises a mixture of large scale industrial brewing structures, large areas of hardstanding and playing fields.

1.3 The redevelopment will provide homes (including affordable homes), a Care Village for an older population, complementary commercial uses, community facilities, a new secondary school alongside new open and green spaces throughout. Associated highway improvements are also proposed, which include works at Chalkers Corner junction.

1.4 The three planning applications are as follows:

- Application A ï hybrid planning application for comprehensive mixed-use redevelopment of the former Stag Brewery site consisting of:

  Land to the east of Ship Lane applied for in detail (referred to as ôDevelopment Area 1ö throughout); and
  Land to the west of Ship Lane (excluding the school) applied for in outline detail (referred to as ôDevelopment Area 2ö throughout).

- Application B ï detailed planning application for the school (on land to the west of Ship Lane).

- Application C ï detailed planning application for highways and landscape works at Chalkers Corner.

1.5 Full details and scope of all three planning applications are described in the submitted Planning Statement, prepared by Gerald Eve LLP.

1.6 The purpose of this Retail and Leisure Statement is to assess the flexible retail and leisure floorspace proposed as part Application A. The proposed description of development for Application A is:

"Hybrid application to include the demolition of existing buildings to allow for the comprehensive phased redevelopment of the site:

Planning permission is sought in detail for works to the east side of Ship Lane which comprise:

- *Demolition of existing buildings (except The Maltings and the façade of the Bottling Plant and former Hotel), walls, associated structures, site clearance and groundworks;*

- *Alterations and extensions to existing buildings and erection of buildings varying in height from 3 to 8 storeys plus a single storey basement*
- *443 residential apartments*
- *Flexible use floorspace for:*
  - Retail, financial and professional services, café/restaurant and drinking establishment uses
  - Offices
  - Non-residential institutions and community use
  - Boathouse
- *Hotel / public house with accommodation*
- *Cinema*
- *Gym*
- *Offices*
- *New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works*
- *Provision of on-site cycle, vehicle and service parking at surface and basement level:*
- *Provision of public open space, amenity and play space and landscaping.*
- *Flood defence and towpath works*
- *Installation of plant and energy centres*

Planning permission is sought in outline with all matters reserved for works to the west of Ship Lane which comprise:

a) *The erection of a single storey basement and buildings varying in height from 3 to 7 storeys*
b) *Residential development of up to 224 units*
c) *Nursing and care home (up to 80 en-suite rooms) with associated communal and staff facilities*
d) *Up to 150 units of flexible use living accommodation for either assisted living or residential use*
e) *Provision of on-site cycle, vehicle and service parking*
f) *Provision of public open space, amenity and play space and landscaping.*
g) *New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works"*

1.7 This Retail and Leisure Statement should be read in conjunction with the other documents forming part of the planning applications. The purpose of this Statement is to test the proposed flexible retail and leisure uses (as proposed by Application A) in terms of their compliance with relevant national, regional and local retail and leisure planning policies.

1.8 In particular this Retail and Leisure Statement has been prepared having full regard to the 'Vision' document prepared by Savills which conveys the type of retail and leisure offer envisaged and the types of operators that might be attracted to the scheme. The proposed retail and leisure uses are speculative but informed by demand expressed by potential operators.

1.9 The methodology for assessing the retail and leisure floorspace has been agreed with officers of the LBRuT as part of detailed pre-application discussions. In particular this Statement adopts the following methodology:

- Use of a study area equivalent to an approximate 5 – 10 minute drive time reflecting the localised nature of the proposed retail and leisure floorspace which is primarily intended to serve the future residential population of the scheme

- Assessment of potential effects of the proposed retail and leisure floorspace upon proximate local centres including East Sheen, Kew Gardens Station and Barnes

- Regard has been had to the retail and leisure evidence base including forecasts of available expenditure and the requirement for new retail and leisure floorspace
- Review of local cinema provision
- Review of relevant retail and leisure planning policy including any site specific designations
- An assessment of the spending capability of the future residential population of the proposed scheme in terms of supporting new retail and leisure floorspace
- Qualitative review of retail and leisure provision within local centres within the study area
- Consideration of the óappropriatenessô of scale of the proposed retail and leisure uses and their potential effects upon local centre having regard to their composition, retail offer and general health.

1.10 The relevant retail and leisure evidence base comprises the Richmond Retail Study 2014 Update, Town Centre Heath Checks 2013 together with the Mayorõs London Town Centre Health Check Analysis 2016 and Consumer Expenditure and Comparison Goods Floorspace Need in London October 2017. Reference to the key conclusions of the evidence base in so far as they are relevant to the consideration of the application proposals is made within this Statement

1.11 In addition, RPS undertook field work in July 2017 relating to the health of local town centres including local cinema provision.

1.12 The review of the evidence base and the RPS fieldwork inform the assessment of the proposed retail and leisure floorspace against local, regional and national policy.

1.13 The remainder of this report is organised into the following sections:

- Section 2: The proposed development
- Section 3: Site Designation
- Section 4: Retail and Leisure Planning Policy
- Section 5: Retail and Leisure Evidence Base
- Section 6: Existing Shopping and Leisure Patterns
- Section 7: Sequential Assessment
- Section 8: Impact Assessment
- Section 9: Conclusions

2 THE PROPOSED DEVELOPMENT

2.1 The application proposals significantly comprise the provision of 817 residential units together with a range of flexible uses including a mix and range of retail and leisure uses (Use Classes A1 ï A4 and Class D1). The proposed flexible uses directly support the day to day needs of the future residents of the scheme as well as the established local residential community.

2.2 The provision of local shops, leisure uses and services close to where people live and work helps to create sustainable lifetime communities consistent with the policies of the Local Plan, London Plan and the National Planning Policy Framework (NPPF).

2.3 The proposed flexible uses will include a mix of Class A1, A2, A3, A4, D1, D2 and B1 uses and comprises a maximum 4,664sqm GIA floorspace. The focus of this Statement is on the assessment of the retail and leisure uses (Use Classes A1, A3, A4 and the proposed cinema).

2.4 The flexible retail and leisure uses will be distributed across the scheme however a significant proportion of these uses will be focused within a ôHigh Street Zoneö which will provide a commercial core within the scheme.

2.5 The Applicant is proposing a range of conditions to control the proposed floorspace. Importantly, such conditions need to provide a reasonable degree of flexibility in order to be attractive to future operators whilst providing the Council with certainty regarding the quantum, nature and format of the proposed flexible floorspace.

2.6 The proposed flexible floorspace is speculative in nature but the Applicantøs plans for the redevelopment of the site are informed by demand expressed by potential operators as conveyed in the ôVisionö document (referred to earlier).

2.7 Significantly, the ôVisionö for the retail and leisure uses is distinct from the offer found in nearby town centres including East Sheen. In this way, the application proposals will complement, rather than compete, with the existing retail and leisure provision found in town centres.

2.8 The proposed flexible retail and leisure uses will first and foremost fulfil the day to day needs of the future residents and working population of the scheme as well as helping to stimulate vibrancy, create interest and activity at street level through the provision of a range and mix of local shops, restaurants, cafes and other service and ôemployment generatingö uses. The scheme has been designed to complement East Sheen, maximise the siteøs riverside setting and re-connect the local area to the historic Mortlake High Street.

2.9 The ôVisionö is consistent with the Counciløs policies for the redevelopment of the site which are based upon a desire to provide a new centre and village heart for Mortlake.

2.10 It is envisaged that the types of operators that are likely to be attracted to the scheme will include a range and mix of independent retailers, restaurants, cafes and boutiques. Typically these will be businesses which are not currently represented within the local area but which are attracted to a mixed use village type development where there is a significant residential component and a riverside setting.

2.11 It is inevitable that some visitors from a wider area will be drawn to the scheme given the siteõs riverside setting. This is likely to have spin-off benefits for existing businesses including those located within East Sheen. Even so, the focus of the new flexible retail and leisure uses will be on meeting local needs.

2.12 The proposals do not seek to replicate the provision found in nearby East Sheen district centre or other local centres. In this way the vitality and viability of East Sheen (and other centres) will be protected as the proposals will complement rather than harm centres.

2.13 This Retail and Leisure Statement tests the application proposals on the basis of the maximum (worst case) permissible flexible floorspace parameters described below.

2.14 Up to 2,510sqm flexible use floorspace is proposed within a ôHigh Street Zoneö with the balance of the floorspace distributed across the remainder of the scheme, of which no less than 50% of the flexible commercial use floorspace will be for Class A1 shops (1,255qm).

2.15 Furthermore, it is proposed to cap the amount of flexible floorspace by use as follows:

- Retail (Class A1) ï 2,500sqm
- Financial and Professional Services (Class A2) ï 200sqm
- Cafes/restaurants (Class A3) ï 2,200sqm
- Drinking Establishments (Class A4) ï 1,600sqm

2.16 The total Class A1 retail floorspace for the development as a whole would therefore range from 1,255sqm to 2,500sqm. It is significant that the lower level of retail floorspace is below the threshold set by the NPPF for testing impact. Nevertheless, this Statement tests the maximum Class A1 floorspace permissible in order to robustly assess the potential effects of the scheme upon town centres.

2.17 The proposed retail and leisure uses will be provided within predominately small commercial units, i.e. the types of units most suitable for independent and niche retailers and the like. There will be a limited number of larger units, for example, in order to provide strategically placed anchor units and to cater for anticipated requirements. The proposed cinema will comprise one of the largest units. The cinema is expected to take the form of a boutique type offer with up to three screens (Block 1).

2.18 The table below provides details regarding the location, types of uses and the amount of floorspace for the proposed flexible uses.

Block No.	Floor	Uses	Floor Area (sqm GIA)
2	Ground	A1, A2, A3, A4, B1	670
4	Ground	A1, A3, A4, B1, D1	468
5	Ground (part)	A1, A2, A3, A4, B1	568
6	Ground	A1, A2, A3, A4, B1	449
7	Ground	A1, A2, A3, A4, B1	630
8	Ground	A1, A2, A3, A4, B1	518
9	Ground	A1, A3, A4, B1, D1, Boathouse	351
10	Ground	A1, A2, A3, A4, B1, D1	329

11	Ground	A1, A2, A3, A4, B1	327
12	Ground	A1, A2, A3, A4, B1	354
Total			**4,664**

2.19 Similarly, the table below summarises the maximum amount of flexible use floorspace proposed within the ‘High Street Zone’

Block	Maximum Floor Areas (sqm GIA)
2	235
5	568
6	449
7	225
8	331
10	329
11	143
12	230
Total	**2,510**

2.20 Having described the nature of the proposed flexible retail and leisure uses, the next section of this report gives consideration to the designation of the application site within the development plan.

3 SITE DESIGNATION

3.1 The application site is situated, at its closest point, within 160 metres of the defined town centre boundary and secondary shopping frontage of East Sheen district centre and Mortlake railway station. The site has excellent linkages with the town centre and is served by both local bus and rail services. In retail and leisure planning policy terms the site should be regarded as an óedge of centreô location.

3.2 Significantly, the former Stag Brewery is specifically identified as Proposal Site S4 by the ósavedô non-superseded Richmond upon Thames Unitary Development Plan (UDP) where redevelopment is supported in circumstances where rationalisation of brewery operations takes place. The policy states that redevelopment should provide for the retention of existing employment levels and river related uses. The policy allocation is silent upon the precise range of uses and quantum of floorspace that may form part of any scheme of development.

3.3 The application site is an edge of edge location and falls within the óMortlake Area of Mixed Useô The site is expected to 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 óemployment generatingô uses are also supported. In this respect it is clear that employment uses are not restricted to just traditional Class B employment uses.

3.4 Adopted policy DMTC 2 confirms that Areas of Mixed Use are appropriate for a mix of uses that meet primarily local needs. The policy directly supports the provision of local shops and other retail service uses etc.

3.5 The redevelopment of the former Stag Brewery is also subject of an adopted Planning Brief (July 2011) for the site which envisages a new óvillage heart for Mortlakeô In particular the Brief states that the redevelopment of the site should provide a new recreational and living quarter with a mix of uses. The range of uses should include ñrestaurant cafes and small retail spaces, community leisure usesò including Use Classes A1, A3, A4, D2 (paragraph 1.5 refers). The inclusion of these uses as part of a scheme of development is considered important in terms of providing the necessary vitality and viability for the scheme. Again it is clear that a range of retail and leisure uses are supported.

3.6 Paragraph 5.14 of the Planning Brief refers to the retail offer as including small convenience shops and óspecialistô shops. These should be ósmall scaleô retail uses which should not compete with East Sheen district centre. Furthermore, the Brief states that the area is not considered a retail destination in its own right and that it is important that retail should be ancillary to the uses on the site to serve local needs.

3.7 Neither the UDP nor the Brief indicate the amount of commercial (including retail and leisure) floorspace that would be supported. Nevertheless, a key requirement is that any retail and leisure uses should serve local needs, complement East Sheen and should be in sufficient quantities and locations to ensure key active frontages.

3.8 Against this background, a range and mix of retail and leisure uses are supported in principle provided that they do not, a) create a retail destination in their own right and b) compete with East Sheen district centre. As discussed above, the Applicant's Vision for the site is entirely compatible with these requirements. This is important in terms of satisfying local and national retail and leisure planning policy tests including the sequential approach to site selection and impact.

3.9 In October 2012 the Council consulted on a Site Allocations DPD. The DPD has since been abandoned in favour of progressing a new Local Plan (which has reached an advanced stage of formulation). Nevertheless, the DPD proposed the allocation of the application site under Proposal Site EM1 for "Redevelopment for mixed uses to include residential including affordable units, open space, primary school, community and health, business, sports and leisure uses; river-related uses; retention of playing fields; possible bus stopping/turning Facility".

3.10 The supporting text to the draft policy at paragraph 3.8.1 reconfirms much of the guidance set out within the adopted Planning Brief, namely:

> **"The site should provide a new village heart for Mortlake including a new recreational and living quarter with a mix of uses aimed at creating vibrant links between the River and the town and enlivening the Riverside frontage and Mortlake High Street. A key structural component will be a new green space link to the Riverside bordered by high quality buildings containing a mix of uses and active frontages. There should be a mix of uses particularly to the east of Ship Lane to create a new Mortlake Village, to generate vibrancy, local employment and leisure opportunities. Uses should include restaurants, cafes and small retail spaces, community, health and community leisure uses, a museum, boat houses and other river-related uses/activities. Employment uses could include lower cost units suitable for small businesses, creative industries and scientific and technical businesses including green technology. Development should also provide residential use."**

3.11 Significantly, the draft Richmond upon Thames Local Plan, which was submitted to the Secretary of State in May 2017 and has since been subject of an examination in public and proposed modifications, consistently proposes to allocate the site under SA24 for a range of 'appropriate uses' including, commercial uses 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. The policy (as submitted) states:

> **"<u>SA 24 Stag Brewery, Lower Richmond Road, Mortlake</u>**
>
> **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-form entry secondary 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.”

- **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.**
- **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.”**

3.12 The draft policy has been subject to a number of representations arising from consultation. A number of those representations focus upon the provision of a school as part of the overall mixed use redevelopment of the site. Even so, the majority of representations support the general mix of uses for the redevelopment of the site against which the current applications proposals have been formulated.

3.13 Whilst the policy is silent upon the quantum of floorspace associated with particular uses, in accordance with the NPPF, the policy is framed in a positive manner by actively supporting the provision of a range and mix of retail and other commercial uses as part of an ó<u>inviting and vibrant new centre</u>ô [RPS Emphasis]

3.14 The Local Plan was subject of an examination in October 2017, since when the Council has published Main Modifications. The consultation period for comments expired on 2nd February 2018. In addition, some Minor Additional Modifications have been published by the Council. Responses to the Modifications have subsequently been provided to the Inspector to enable him to finalise his report. The Local Plan has therefore reached an advanced stage preparation. None of the Modifications raise substantive issues in relation to the Application site in so far as relevant to retail and leisure policy considerations.

3.15 The application proposals are consistent with the mix of uses supported by draft policy SA 24. Furthermore, the proposed óHigh Street Zoneô is entirely compatible with the Councilõs desire to create a ónew centreô and óvillage heartô These are important considerations in relation to any assessment of the application proposals.

3.16 National retail and leisure policy tests (sequential and impact tests) apply to proposals for new retail and leisure development located outside designated town centres except where they are in accordance with specific proposals set out within an up to date local plan. In addition, at the local level (Richmond and the London Plan) a scale test is prescribed. The scale test is relevant in terms of informing the appropriateness/compatibility of the proposals in terms of the sequential and impact tests and such matters are duly considered by this Statement.

3.17 In this case, the former Stag Brewery secures a specific designation for mixed use development within the adopted development plan and similarly within the emerging draft Local Plan which has reached a very advanced stage where appropriate weight should be afforded to its policies. These allocations are supported by the adopted Planning Brief for the site. Proposed Main Modifications to policy SA24 confirm that proposals should have 'regard' to the Planning Brief. Furthermore, the former Stag Brewery is located within an Area of Mixed Use which specifically supports a range of uses that contribute to vitality and viability including the evening economy.

3.18 Against this background it should not be necessary to test the proposals in terms of the sequential approach to site selection or impact. There is clear policy support promoting the site's redevelopment for a mix of uses including residential, business and other commercial uses including retail, leisure and employment generating uses. Furthermore, policy promotes a new 'centre' and heart for Mortlake comprised of retail and leisure uses that serve local needs. In these respects, the application site is a 'preferred location' in terms of the NPPF.

3.19 The support provided by policy for the site's redevelopment is framed in terms of the 'appropriateness' of such uses i.e. that any new retail/leisure uses should not harm town centres and should primarily serve local needs. In this case, the primary purpose of the proposed retail and leisure uses is to directly support the significant future residential population of the scheme and as such is entirely appropriate.

3.20 The scale and impact tests are related. Inappropriate scale development is more likely to result in harmful effects upon town centres within which they are located or upon nearby centres including the hierarchy of centres. Such matters however can only be determined by a thorough examination of the retail/leisure offer including reference to the quantum, type, quality and target market for such facilities and consideration of the extent to which these complement, or compete with town centres. Such matters are duly considered in subsequent sections of this Statement.

3.21 In summary, the proposed retail and leisure uses are consistent with the thrust of both the adopted and emerging development plan policy allocation of the Application site and the Planning Brief. In these terms, the site is a 'preferred location'. The nature of the proposed flexible floorspace and the control mechanisms which the Applicant is proposing ensure there would be no significant adverse effect upon local town centres.

3.22 The next section of this report provides a review of relevant non site specific retail and leisure policy applicable to the assessment of the application proposals.

4 RETAIL AND LEISURE POLICY

4.1 This section of the Statement provides an overview of relevant retail and leisure planning policy operating at the national, regional and local levels applicable to the determination of the application proposals.

4.2 Application proposals such as these should be determined in accordance with the policies of the development plan unless other material considerations indicate otherwise. As evidenced in the previous section of this Statement, the designation of the site for mixed use development, including retail and leisure uses, is material to the determination of the application proposals. The site is a 'preferred location' for new retail and leisure uses that serve a local need.

4.3 In this case, the statutory development plan comprises the London Plan 2016 together with the saved non-superseded policies of the Richmond upon Thames Unitary Development Plan (2005), Core Strategy (2009), Proposals Map 2015 and the Development Management Plan (2011).

4.4 The Council is close to adopting a new Local Plan. The draft Local Plan was submitted to the Secretary of State in May 2017 and an examination in public took place in October 2017. The Council consulted upon Main Modifications and Additional Modifications in December 2017. The Inspector is in the process of preparing his report into representations to the Local Plan. The Local Plan has therefore reached an advanced stage of formulation.

4.5 The Council's emerging retail policies are supported by a detailed and up to date evidence base published in the form of:

- The Richmond Retail Study Update 2014; and
- Town Centre Health Checks 2013

4.6 Similarly, the Mayor of London has initiated a full review of the London Plan. A new draft London Plan was published in December 2017. The consultation period for the receipt of representations expires on 2nd March 2018. The new draft London Plan is supported by an updated retail evidence base.

National Planning Policy Framework

4.7 The National Planning Policy Framework (NPPF) was published by the Government in March 2012. At the end of 2016, the Government consulted upon potential changes to the NPPF. Amendments to the NPPF are expected to be published in March 2018. The proposed changes are not expected to alter the Government's policy relating to economic development, town centres or retail and leisure uses.

4.8 The NPPF includes a presumption in favour of sustainable development, including sustainable economic development. In relation to decision making this is defined as:

- approving development proposals that accord with the development plan without delay and

- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
  - 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
  - specific policies in this Framework indicate development should be restricted

4.9 Paragraph 19 of the NPPF states that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and significant weight should be placed on the need to support economic growth through the planning system. It also states that investment in business should not be over-burdened by the combined requirements of planning policy expectations.

4.10 The governmentøs policies relating to main town centre uses, including retail and leisure uses, are set out at paragraphs 23 - 27 of the NPPF.

4.11 Government policy affords protection to town centres by making them the first preference for new retail and leisure development (together with other main town centre uses as defined by the NPPF) and ensuring their vitality and viability is protected from potentially harmful edge and out of centre development.

4.12 The NPPF encourages local planning authorities to plan proactively to meet the development needs of business. Furthermore, planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. This includes policies which promote competitive town centres that provide customer choice and a diverse retail and leisure offer. The NPPF requires local authorities to allocate a range of suitable sites to meet the scale and type of retail and leisure development needs. The application site is one such location. The NPPF emphasises that it is important that such needs are met in full and are not compromised by limited site availability. The application proposals are broadly compliant with these national policy objectives.

4.13 The NPPF establishes two key policy tests against which proposals for new retail and leisure uses (located outside town centres and which do not accord with an up to date Local Plan) are required to be assessed, namely:

- the sequential approach to site selection; and
- the impact test

4.14 As evidenced above, the application site is allocated in an up to date local plan for a mix of uses. The application proposals accord with the allocation of the site and therefore there should be no requirement to examine more centrally located sites within town centres. Indeed, the application site has been allocated in partial recognition that it is an edge of centre site with good proximity and linkages to East Sheen town centre.

4.15 For the reasons already explained, the proposed retail and leisure uses will be quantitatively and qualitatively different to those found within nearby centres. The proposed scheme will complement the role and function of East Sheen and other town centres and will primarily cater for the day to day needs arising from the future residential and working populations of the proposed development. A range and mix of uses are required to ensure the overall development is visually stimulating and engaging.

4.16 The NPPF states that when considering edge-of-centre and out-of-centre proposals, preference should be given to accessible sites that are well connected to town centres. It also notes that flexibility on issues such as format and scale should be demonstrated. The application site is located within 160 metres of Mortlake railway station and East Sheen district centre. The site is also served by bus route 419 (Richmond to Hammersmith via Mortlake and Barnes). The site is therefore readily accessible by modes of public transport and is within an easy walking and cycling distance of East Sheen town centre (approximately 3 minutes walk).

4.17 National planning policy requires an assessment of impact for retail and leisure proposals outside town centres (unless in accordance with an up to date Local Plan allocation) comprising 2,500sqm or more floorspace (the ódefaultô position), or any lower threshold set by an adopted Local Plan.

4.18 As the following paragraphs record, the statutory local plan does not set a lower threshold for testing impact. The designation of the site for development is silent regarding the quantum of retail and leisure floorspace that would be supported. The only reference is to óappropriateô retail and leisure uses. Against this background and discussions with the Councilôs planning officers, the Applicant has agreed to prepare this Statement to explore the potential effects of the proposed retail and leisure aspects of the proposed development.

4.19 The NPPF states that where an impact assessment is required, this should include an assessment of:

- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal
- the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made

4.20 The application proposals comprise a substantial and comprehensive scheme of development which will take a number of years to develop. Accordingly, the retail and leisure assessment has been undertaken on the basis of a design year of 2024. This is considered to be a robust assessment year for testing impact.

4.21 Finally, paragraph 27 states that ñwhere an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused.ò This however needs to be weighed in the óplanning balanceô together with all other relevant material considerations. It is clear in this case that the application proposals offer a substantial package of economic, social and environmental benefits. Importantly they will bring the site back into full beneficial use.

National Planning Practice Guidance (NPPG)

4.22 The NPPG was originally published in March 2014, since when various parts of the guidance have been updated to reflect emerging best practice and government policy announcements.

4.23 The NPPG requires local planning authorities to take into account market signals when planning for town centres. Paragraph 2b-004 provides the following advice:

> **“Local planning authorities should take full account of relevant market signals when planning for town centres and should keep their retail land allocations under regular review. These market signals should be identified and analysed in terms of their impacts on town centres. This information should be used to inform policies that are responsive to changes in the market as well as the changing needs of business.”**

4.24 It is therefore clear that local planning authorities need to be realistic in both plan-making and decision-taking processes and fully recognise the needs of businesses.

4.25 The NPPG further recognises that:

> **“It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests. This should ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise...” (paragraph 2b-006)**

4.26 The purpose of searching for sequential sites is to ensure that the identified need is met in the most appropriate location (as continued to be confirmed by the NPPG and the courts). Indeed, the courts have established that the suitability of potential sites needs to be judged having regard to the nature of the need. The test also needs to be conducted in a ŕetailer blindômanner. In this respect the proposed retail and leisure uses are speculative in nature but informed by the types of interest being expressed to the Applicant by potential operators.

4.27 The application site is allocated for development including appropriate retail and leisure uses in order to create a ńew centre and heart for Mortlakeô Furthermore, the Area of Mixed Use designation means the site is unquestionably a ṕreferred locationôfor such uses. As referred to above, it is the appropriateness of these uses which needs to be tested in terms of whether the proposals will have any significant adverse effects upon nearby centres, in particular East Sheen.

4.28 The NPPG further advises:

> **“The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of town centre locations, with preference for accessible sites which are well connected to the town centre. It supports the viability and**

vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking." (paragraph 2b-008)

4.29 The NPPG requires local planning authorities to set 'policies to apply the sequential test to proposals for main town centre uses that may come forward outside the sites or locations allocated in the Local Plan' (paragraph 2B-009). In this case, the application site is allocated as a preferred location for appropriate retail and leisure uses as part of a mixed-use scheme of development. Accordingly, it is clear that it is not necessary to assess the proposals in sequential terms (provided that the impact test can be satisfied i.e. the proposed retail and leisure uses are of an appropriate scale which will not harm nearby town centres).

4.30 With regard to the impact test, the NPPG notes that the purpose of the test is to ensure that the impact of certain out-of-centre and edge-of-centre proposals on existing town centres is not significantly adverse. It notes that the impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. In this respect, the Council's Retail Study 2014 provides an up to date assessment of qualitative and quantitative issues and forms the basis of the impact assessment undertaken in this Statement. Given the allocation of the site for a mix of uses including retail and leisure uses the key consideration should relate to the appropriateness of those uses and their potential effects upon nearby centres. With respect to the latter, it has been agreed with the Council that the assessment of impact should focus upon East Sheen, Barnes, Kew Gardens and White Hart Lane centres.

4.31 The NPPG prescribes (consistent with the NPPF) a series of indicators which should be used to determine the health of town centres (paragraph 2b-005) namely:

- diversity of uses
- proportion of vacant street level property
- commercial yields on non-domestic property
- customers' views and behaviour
- retailer representation and intentions to change representation
- commercial rents
- pedestrian flows
- accessibility
- perception of safety and occurrence of crime
- state of town centre environmental quality

4.32 The 2014 Retail Study together with the 2013 Town Centre Health Checks prepared for LBRuT provide information regarding the health of town centres. This is supplemented by surveys of local town centres undertaken by RPS in July 2017. In addition, RPS has had regard to the latest London Town Centre Health Check Analysis 2017 prepared in support of the new draft London

Plan (published January 2018). The latter however only provides information in relation district centres and higher order centres.

4.33 The NPPG confirms the purpose of the impact test is to ensure that impact over time (up to five years (ten for major schemes) for certain out of centre and edge of centre proposals on existing town centres is not significantly adverse. In this respect it advises that it óis important that the impact is assessed in relation to all town centres that may be affected, which are not necessarily just those closest to the proposal and may be in neighbouring authority areasô (paragraph 2b-013).

4.34 The proposed retail and leisure uses are intended to serve a locally arising need. Accordingly, it is appropriate to consider only those centres located nearest to the application site (as detailed above). The scale of the proposed uses will not affect higher order centres which are located more distant from the application site and provide a diverse retail offer and different attraction.

4.35 Furthermore, paragraph 2b-017 confirms that:

> **“As a guiding principle impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as they would normally not compete directly). Retail uses tend to compete with their most comparable competitive facilities.”**

4.36 Where wider town centre developments or investments are in progress, the NPPG advises that it will also be appropriate to assess the impact of applications on that investment. Key considerations will include:

- **the policy status of the investment (i.e. whether it is outlined in the Development Plan)**
- **the progress made towards securing the investment (for example if contracts are established)**
- **the extent to which an application is likely to undermine planned developments or investments based on the effects on current/ forecast turnovers, operator demand and investor confidence**

4.37 The Guidance provides a checklist of the steps that should be taken in applying the impact test, namely:

- establish the state of existing centres and the nature of current shopping patterns (base year)
- determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur
- examine the óno developmentô scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);

- assess the proposal's turnover and trade draw (drawing on information from comparable schemes, the operator's benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw)
- consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities (which may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact)
- set out the likely impact of that proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues
- any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal's trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences to the viability and vitality of existing town centres

4.38 Judgements regarding whether likely adverse impacts are 'significant' should be reached in light of local circumstances (paragraph 2b-018), for example, considered against the health of relevant town centres.

4.39 The assessment of impact is set out in section 8 of this Statement. The assessment broadly follows the methodology set out in the NPPG recognising the special circumstances regarding the allocation of the application site in the development plan and the need for such assessments to be conducted in an 'appropriate and proportionate manner'.

The London Plan

4.40 The London Plan was adopted by the Mayor in March 2016. It is currently in the process of being reviewed with a new draft London Plan published for consultation in December 2017.

4.41 The London Plan sets out the planning policy basis for retail and leisure development and other town centre uses in London. The Mayor's town centre policies are supported by the Town Centres SPG (July 2014) which aids the interpretation of the Mayor's policies applicable to both plan making and decision taking.

4.42 The overarching objectives of the London Plan are:

- A city that meets the challenges of economic and population growth
- An internationally competitive and successful city
- A city of diverse, strong, secure and accessible neighbourhoods
- A city that delights the senses
- A city that becomes a world leader in improving the environment
- A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities

4.43 The Plan identifies the key forces driving change in London as population growth and economic and employment change. Increases in population will result in simultaneous increases in available retail expenditure and additional demand for new retail and leisure facilities within London. In this respect, the application proposals will help to fulfil part of that need through the provision of additional retail and leisure floorspace that supports both the local residential and working populations.

4.44 The London Plan establishes a network of town centres within its overall strategy. The London Plan defines five broad types of town centre within London, namely; International Centres, Metropolitan Centres; Major Centres, District Centres and Neighbourhood and Local Centres. East Sheen (the most proximate and relevant town centre) is identified as a district centre with ómediumô growth prospects meaning, ñtown centres with moderate levels of demand for retail, leisure or office floorspace and with physical and public transport capacity to accommodate it.ò

4.45 Policy 2.15 states that town centres will provide:

- The main foci beyond the Central Activities Zone for commercial development and intensification, including residential development
- The structure for sustaining and improving a competitive choice of goods and services conveniently accessible to all Londoners, particularly by public transport, cycling and walking
- Together with local neighbourhoods, the main foci for most Londonerõs sense of place and local identity within the capital

4.46 Development proposals for town centre uses are required to conform with policies 4.6, 4.7 and 4.8 and the criteria set out in policy 2.15 (a) to (h):

- Sustain and enhance the vitality and viability of the centre
- Accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations
- Support and enhance the competitiveness, quality and diversity of town centre retail, leisure, arts and cultural, other consumer services and public services
- Be in scale with the centre
- Promote access by public transport, walking and cycling
- Promote safety, security and lifetime neighbourhoods
- Contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure
- Reduce delivery, servicing and road user conflict

4.47 The supporting text to the policy recognises a wide range of uses will enhance the vitality and viability of town centres. Leisure uses including Class A3/A4 uses, cinemas etc contribute to

London's evening economy and ensure that town centres remain lively beyond shopping hours. Similarly, such uses enliven residential and business neighbourhoods and help to deliver sustainable schemes of development. The London Plan therefore provides clear support for the type of development proposed for the application site.

4.48 The application proposals are not within a defined town centre therefore policy 2.15 is not strictly applicable. Indeed, this interpretation is confirmed by the Mayor's Town Centres SPG (July 2014). Policy 2.15 however sets the context for policy 4.7.

4.49 Policy 4.6 supports the development of art, cultural and entertainment facilities. Development is required to satisfy the following criteria:

> **a) fulfil the sequential approach and where necessary, complete an impact assessment (see Policy 4.7)**
> **b) be located on sites where there is good existing or planned access by public transport**
> **c) be accessible to all sections of the community, including disabled and older people**
> **d) address deficiencies in facilities and provide a cultural focus to foster more sustainable local communities.**

4.50 For the reasons previously advanced, the application site benefits from a specific designation for development to include a range and mix of retail and leisure uses. Furthermore, local authorities are required to:

> **d) promote and develop existing and new cultural and visitor attractions especially in outer London and where they can contribute to regeneration and town centre renewal**
> **g) provide arts and cultural facilities in major mixed use developments**
> **h) seek to enhance the economic contribution and community role of arts, cultural, professional sporting and entertainment facilities.**

4.51 The supporting text to the policy at paragraph 4.36 recognises that:

> **"London is a great city for night time entertainment and socialising, with a unique selection of bars, restaurants, performing arts venues, cinemas and night clubs. The night time economy also forms an important part of London's economy. The Mayor encourages a supportive approach to planning these diverse night time activities in appropriate locations."**

4.52 The London Plan includes a range of policies (policy 4.7 and 4.8) which seek to support the role and function of town centres.

4.53 Policy 4.7B establishes a series of principles against which proposals for new retail and town centre development should be considered against. These include:

- The scale of retail, commercial, cultural and leisure development should be related to the size, role and function of a town centre and its catchment
- Retail, commercial, cultural and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport

- Proposals for new, or extensions to existing, edge or out of centre development will be subject to an assessment of impact.

4.54 As previously highlighted, the impact test is the key to establishing the appropriateness of the scale of new retail and leisure development. The scale test is about protecting one centre against inappropriate scale development in another nearby location and/or centre, the consequences of which might alter the role and function of a given centre and its position within the classification of centres (Annex 2, London Plan). The re-classification of centres can only occur through a review of the London Plan.

4.55 The application site is not part of a defined town centre although it is allocated for a mix of town centre uses and is located within an Area of Mixed Use. The sole concern must therefore relate to the effect of the proposals upon the vitality and viability of town centres and their ability to continue to perform a role and function commensurate with their position in the retail hierarchy.

4.56 The proposed retail and leisure floorspace is in scale with the type and nature of retail facilities envisaged by the development plan for the application site. Furthermore, the proposals pose no threat, for example, to the vitality and viability of nearby East Sheen district centre.

4.57 As the next sections of this report demonstrate, the retail and leisure offer of the proposed development is very different in terms of its intended customer base, scale and type to that found in nearby town centres. Fundamentally, the application proposals are about serving the day to day needs of the local residential and working populations (existing and planned).

4.58 The proposed retail and leisure uses form an ancillary but important component of the overall scheme of development creating a sustainable lifetime neighbourhood in an attractive riverside setting in accordance with the site's policy designation. The proposed retail and leisure uses help to create active street frontages as part of a stimulating mixed-use environment.

4.59 Policy 4.8 requires local planning authorities to take a proactive approach to planning for retailing and related facilities and services by:

- Bringing forward capacity for additional comparison goods retailing
- Support convenience retailing particularly in District, Neighbourhood and more local centres to secure sustainable patterns of provision and strong lifetime neighbourhoods
- Provide a policy framework for maintaining, managing and enhancing local shopping facilities and to develop policies to prevent the loss of retail and related facilities that provide essential convenience and specialist shopping
- Identify areas under served in local convenience shopping facilities and services

4.60 The supporting text identifies (paragraph 4.48) larger centres as being appropriate locations for accommodating much of the growth in comparison goods retail expenditure and floorspace. The availability of accessible local shops and related uses meeting local needs for goods and services is also important in securing 'lifetime neighbourhoods' – places that are welcoming, accessible and inviting to everyone. The application proposals have been designed in the spirit of this policy objective. Furthermore, the Council has consistently identified the application for development including a range of retail and leisure uses to create a new centre and heart for

Mortlake. Importantly, in allocating the site, the Council will have had to satisfy itself that the allocation meets with national and regional policy requirements.

4.61 The London Plan is supported by a range of evidence based documents and supplementary planning guidance including Consumer Expenditure and Comparison Goods Floorspace Need in London (2009, 2013 and 2017) and London Town Centre Health Checks (2009, 2013 and 2017) and Town Centres SPG 2014. Further commentary on the Mayor's Consumer Expenditure and Comparison Goods Retail Floorspace Need is provided in the next section of this report.

New Draft London Plan

4.62 The draft new London Plan contains a number of new policies relevant to the consideration of retail and leisure uses. These polices are currently subject of consultation and therefore appropriate weight should be afforded according to the stage of plan preparation reached.

4.63 Draft policy SD6 concerns Town Centres. The policy promotes the vitality and viability, adaptation and diversification of town centres. In particular, Part C of the policy lends support to residential led mixed use development in edge of centre locations such as the application site:

> **"The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport..."**

4.64 Draft policy SD7 sets out the Town Centre Network including the classification of centres.

4.65 Draft policy SD8, entitled 'Town Centres: Development Principles and development plan documents' relates to development within town centre. Part A of the policy supports, consistent with the NPPF, town centres as the preferred location for new retail and leisure uses. Even so, the policy recognises circumstances and supports the allocation of edge of centre sites within Local Plans for town centre uses particularly where such sites can be integrated with town centres by means of public transport, walking and cycling. The policy requires Council's to identify suitable sites to accommodate new residential, retail and leisure development including edge of centre sites.

4.66 Part C of the policy states:

> **"Development proposals should:**
> **1) ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment**
> **2) ensure that commercial space is appropriately located having regard to Part A above, fit for purpose, with at least basic fit-out and not compromised in terms of layout, street frontage, floor to ceiling**
> **heights and servicing, and marketed at rental levels that are related to demand in the area or similar to surrounding existing properties**
> **3) support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents**

4) support the diversity of town centres by providing a range of commercial unit sizes, particularly on larger-scale developments."

4.67 Draft policy E9 concerns ‘Retail, Markets and Hot Food Takeaways’. The policy states:

> **"B In Development Plans, boroughs should:**
> **1) Identify future requirements and locations for new retail development having regard to the town centre policies in this Plan and strategic and local evidence of demand and supply**
> **4) Support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel**
> **5) Provide a policy framework to enhance local and neighbourhood**
> **shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping…**
>
> **E Large-scale commercial development proposals (containing over 2,500 sqm gross A Class floorspace) should support the provision of small shops and other commercial units (including affordable units where there is evidence of local need)..."**

Richmond upon Thames Local Plan

4.68 The statutory Local Plan for Richmond upon Thames comprises the adopted Core Strategy, Development Management Policies (November 2011) together with the saved non-superseded policies of the Unitary Development Plan. The following paragraphs summarise the policy position in so far as relevant to retail and leisure uses and town centres.

4.69 The Core Strategy sets out a vision for town centres. Town centres are considered the most accessible and will continue to be the location for larger shops, offices and leisure uses. Paragraph 4.1.22 makes refers to East Sheen, consistent with the London Plan, as a district centre:

> **"East Sheen is a linear centre with one large supermarket and a wide range of non-food shops and restaurants. Mortlake is the nearest station and the Sheen Lane Centre houses a number of services including the library."**

4.70 Paragraph 6.1.9 confirms that East Sheen has an important role in meeting local needs. Here the Council’s strategy will be to maintain their retailing and employment base functions, and where possible reinforcing retailing to meet potential, and also to protect the existing key shopping frontages. There are opportunities to make transport interchange improvements, and potential redevelopment near to Mortlake Station (the application site).

4.71 Policy CP8 concerns town and local centres. It defines a hierarchy of centres. In addition to East Sheen, other proximate centres to the application site, include Barnes and Kew Gardens Station which are identified as ‘local’ centres and which are defined as comprising shops and services primarily serving local catchments but providing for main weekly convenience shopping. Neighbourhood centres include White Hart Lane. These centres provide shops and services for day to day needs.

4.72 Policy DM TC2 of the Councilôs Development Management Plan concerns local and neighbourhood centres and óAreas of Mixed useô The Proposals Map shows the application site to fall within a wider area designated as an Area of Mixed Use. The policy states that the Council will protect and improve the provision of day-to-day goods and services in the local and neighbourhood centres of the borough. The policy continues by stating that:

> **"These centres are often designated as Areas of Mixed Use and are thus seen as appropriate for a mix of uses that meet primarily local needs."**

4.73 The policy sets out a range of criteria against which proposals within Areas of Mixed Use are required to be assessed against, namely:

> 1. **Provide appropriate mixes of uses, or mixed-use schemes. Appropriate uses could be: new retail, business or employment developments, which should maintain suitable provision for small businesses and other uses which serve the community or attract visitors. Residential development could also be appropriate. See Core Policy 8 of the Core Strategy for appropriate levels of provision.**
> 2. **Are of a scale that enhances the vibrancy and vitality of the centre and do not erode the core function of the centre, or another neighbouring centre or compromise an existing use. This will apply to all proposed uses, including supermarkets.**
> 3. **Respect and enhance the heritage, character and local distinctiveness of the centre, whilst making the most efficient use of land.**
> 4. **Include overall improvements and enhancements of the small centres; or modernise outmoded premises. Development should improve and maintain commercial provision in the smaller centres, without significantly expanding it.**
> 5. **Locate retail in designated shopping frontages, or in a location well-related to them, and/or within an area of mixed use.**
> 6. **Do not add disproportionately to pressure on parking. By supporting proposals that meet these criteria, the Council will ensure that the smaller town centres are self-supporting and reinforce themselves and the local community.**

4.74 Paragraph 4.2.14 states that Areas of Mixed Use (as identified on the Proposals Map) delineate the areas surrounding the smaller centres of the borough that contain a mix of uses, and are seen as being able to either maintain or expand this aspect of their character.

4.75 Furthermore, paragraph 4.2.15 confirms that these areas make an important contribution to the smaller centres, óas they describe the current situation and guide future development into locations that are accessible, sustainable and at the centre of the community.ô

4.76 Paragraph 4.2.17 confirms that ñappropriateò development could include retail, community uses or commercial development.

4.77 The proposed retail and leisure component of the application proposals are consistent with the Councilôs policies for Areas of Mixed Use subject to there being no harm to nearby centres.

4.78 Finally, policy DM TC5 concerns the evening economy. The policy lends support to proposals for cinemas, leisure, restaurants etc provided that:

- They are compatible with other town centre policies including CP 5, 8, 9, and Policy DM TC 1 'Larger Town Centres', Policy DM TC 2 'Local and Neighbourhood Centres and Areas of Mixed Use', Policy DM TC 3 'Retail Frontages'. DM TC 1 is of especial importance, as it encourages the improvement of the provision of the leisure, cultural and tourism offer.
- They add diversity to the evening economies of those areas identified as requiring diversification (Richmond and Twickenham town centres).
- There is not an adverse effect on the amenity of nearby uses, and surrounding residential areas including a cumulative adverse effect.

4.79 The ‘savedô non-superseded Unitary Development Plan sets out a vision for East Sheen and Mortlake as:

> **"Enhance East Sheen shopping centre by:**
>
> - **seeking opportunities to provide more car parking for shoppers and resisting the loss of existing off-street parking;**
> - **encouraging larger shops selling durable goods;**
> - **retaining shops in key frontages and broadening the role of the centre by ensuring that any surplus shop units outside those frontages are occupied by uses providing services to residents such as building society and offices;**
> - **at the same time, ensuring that restaurants and other places of entertainment do not adversely affect nearby residents;**
>
> **Ensure that development on the riverside including any within the Budweiser Stag Brewery does not have an adverse effect on river views or on key landmarks"**

4.80 Having regard to the above policy analysis it is clear that the Council's adopted general policies provide clear support for the development of the application site to include a range and mix of appropriate uses including retail and leisure uses. Indeed, the application site is one of a number of preferred locations subject to there being no harmful effects upon the role and function of nearby centres.

Richmond Upon Thames draft Local Plan 2017

4.81 The Council consulted upon a new draft Local Plan in January 2017. An examination in public took place in October 2017 and the Council produced and consulted upon Proposed Main and Additional Modifications to the Local Plan in December 2017. The Inspector is currently in the process of preparing his report. The Local Plan has therefore reached an advanced stage of formulation and therefore appropriate weight needs to be afforded to the Plan.

4.82 Strategic objectives of the draft Local Plan relevant to the consideration of the application proposals include:

- Ensure there is adequate provision of facilities for community and social infrastructure that are important for the quality of life of residents and which support the growing population, by protecting existing and, where required, securing new facilities and services that meet people's needs.

- Ensure there continues to be good provision of, and access to, shopping and other local services and facilities that meet the needs of our communities
- Reinforce the role of Richmond, Twickenham, Teddington, Whitton and East Sheen centres, which play an important role in the provision of shops, services, employment and housing as well as being a focus for community and cultural life.
- Ensure that local and neighbourhood centres as well as parades of local importance provide a focus for local communities to meet, shop, work and spend leisure time.
- Encourage opportunities for leisure, entertainment, sport, cultural activity and the development of community life.

4.83 The application proposals are consistent with these objectives. They will provide local retail and leisure facilities meeting the needs of the future residents of the scheme as part of a sustainable mixed use development.

4.84 Paragraph 3.1.40 (as deposited) provides a summary of the potential need over the plan period for new retail floorspace within the Borough. In respect of East Sheen (the most proximate centre to the application site) the requirement is for 1,500sqm gross retail floorspace (Use Classes A1, A3, A4 and A5) by 2024. Additionally, paragraph 3.1.41 makes reference to significant development areas outside of the defined main town centre including the former Stag Brewery (the application site). The evidence base underpinning the Local Plan suggests an indicative requirement for 4,250sqm gross Class A3, A4 and A5 outside the main town centres which could be taken up by site allocations including at the former Stag Brewery and by vacant premises.

4.85 Table 7.1.1 sets out the Borough's centre hierarchy. East Sheen is identified as a 'main centre' performing the role of a district centre. Barnes and Kew Gardens comprise 'local centres'.

4.86 Draft policy LP25 relates to development within defined town centres. Although the policy is principally concerned with ensuring new development is compatible with the centre within which it is to be located, part A.3 states, in relation to development outside of defined centres:

> **"When assessing proposals for development outside of existing centres, applicants will have to comply with the requirements of national policy and guidance in relation to impact assessments. For retail developments, including extensions of over 500sqm gross, the Council will require a Retail Impact Assessment. The scope of such assessments will need to be agreed with the Council before submitting a planning application; and..."**

4.87 Once adopted the policy will set a new threshold for impact testing (500sqm) which will supersede the default prescribed by the NPPF (2,500sqm). Even so, the NPPF makes it clear that such assessments should not apply to sites allocated in accordance with an up to date local plan. Again, this places a focus upon assessing the 'appropriateness' of proposals in accordance with any policy allocation. The difficulty with the allocation of the application site however arises from the fact that policy does not explicitly state the quantum of retail and leisure floorspace which might be acceptable notwithstanding the site's clear 'preferred' location status.

4.88 Paragraph 7.1.5 of the Local Plan refers to the Retail Study published in 2014 which estimates that a modest increase in retail floorspace will be needed by 2024. The projections suggest there is scope for about 4,000sqm gross of convenience goods floorspace (Use Class A1), 11,500sqm gross of comparison goods floorspace (Use Class A1) and 6,500sqm gross of Class A3/A4/A5 floorspace. Some of this need is stated as potentially being met by the re-occupation of existing vacant units in some centres. However, the consultants consider that it is unlikely vacant shops can accommodate more than a quarter of the additional capacity needed and hence the Local Plan includes site allocations to meet the remainder of the forecast increase in floorspace needed. The application site is one such allocation although the Plan is silent on the level of contribution that any scheme of development it is expected to make.

4.89 The Vision for Mortlake Area of Mixed Use is stated as (Table at paragraph 7.1.7 refers):

- the vision for Mortlake is based on the redevelopment of the Stag Brewery;
- provide improved links to East Sheen centre; and
- seek an appropriate mix of uses to generate vibrancy and local employment as well as leisure opportunities, including restaurants, cafés, community uses, a museum, boat houses and lower cost units suitable for small businesses.

4.90 It is clear that the redevelopment of the application site is critical to realising the Council's vision for Mortlake.

4.91 The application site is specifically envisaged for a range and mix of uses including retail and leisure uses. The application proposals directly support the Council's Vision for the Mortlake Area of Mixed Use.

4.92 Paragraph 7.1.17 explains that there are a small number of Areas of Mixed Use which are not in the centre hierarchy as their retail function is currently limited, this includes Mortlake. In such cases, parts A and C of draft policy LP25 apply. Even so, this policy cannot be read in isolation from the specific allocation of the application site for mixed use development. The draft policy states that development will be acceptable if it:

> **"Part A: Development in the borough's centres, as defined in the centre hierarchy, will be accepted if it:**
>
> **1. is in keeping with the centre's role and function within the hierarchy and is of a scale appropriate to the size of the centre (also see the Spatial Strategy of this Plan);**
>
> **2. and is in an appropriate location, as follows:**
>
> **a) A1 uses should be located within, adjacent to or well-related (or capable of being made so) to designated shopping frontages.**
>
> **b) For other appropriate uses (see B & C below), major development and/or developments which generate high levels of**

trips should be located within a Main Centre Boundary. Elsewhere development should be located within the defined Area of Mixed Use (AMU boundary). For centres, or parts of centres where no boundary exists, proposals should be well-related to designated shopping frontages.

Proposals not in the above locations, including extensions to existing retail and leisure developments of more than 200sqm gross, should satisfy the Sequential Test as set out in national policy and guidance. Out of centre retail development is not considered appropriate in line with the London Plan; and

3. **does not adversely impact on the vitality and viability of the centre in which the development is proposed, or another centre. When assessing proposals for development outside of existing centres, applicants will have to comply with the requirements of national policy and guidance in relation to impact assessments. For retail developments, including extensions of over 500sqm gross, the Council will require a Retail Impact Assessment. The scope of such assessments will need to be agreed with the Council before submitting a planning application; and**

4. **optimises the potential of sites by contributing towards a suitable mix of uses that enhance the vitality and viability of the centre. Commercial or community uses should be provided on the ground floor fronting the street, subject to other Local Plan policies, including the retail frontages policy LP 26.**

Part C

In addition to A above, in the local and neighbourhood centres as well as parades of local importance, the following applies:

1. **Appropriate uses could include new retail (including markets), business or employment developments, which maintain suitable provision for small businesses, and other uses, which primarily serve the needs of the local community or attract visitors and develop cultural opportunities.**

2. **Development should, wherever possible, include overall improvements and enhancements of the small centres where appropriate, and/or modernise outdated premises."**

Summary

4.93 In summary, the above policy review demonstrates that the proposals for the application site broadly conform to the Council's vision for the area as an 'Area of Mixed Use' – a preferred location for new retail, leisure and commercial uses where the focus is to provide a new centre and heart to Mortlake Village.

4.94 It is very clear that the policies of the development plan direct new retail and leisure floorspace (of an appropriate scale) to the application site. Indeed, the provision of such uses is important to ensure the achievement of lifetime neighbourhoods, sustainable communities and a vibrant scheme of development.

4.95 Set against the above policy background, the application proposals should not be required to be tested in sequential terms. The fulfilment and compliance with the policy allocation of the site is dependent upon a mix of retail, leisure, restaurant and commercial uses.

4.96 Significantly, neither the general policies of the development plan nor the site specific policy designation of the site impose a cap on the amount of retail and leisure floorspace to be comprised within any scheme of redevelopment. Nevertheless, it is clear that the proposals for the site must complement rather than compete with nearby town centres. The proposed retail and leisure uses will primarily meet the day to day needs of the local residential community (existing and proposed) and the working population of the local area.

4.97 The control mechanisms which the Applicant is proposing will ensure that the proposals for the site have a positive beneficial effect on the local area. Conversely, the proposals would not have a significant adverse effect upon town centres for example, through direct competition arising from the duplication of provision. Furthermore, they would not undermine planned investment in nearby town centres, on the contrary the proposals directly respond to and support the Council's vision for the application site. The application proposals will be distinct from the retail and leisure offer of local town centres consistent with the vision for the site set out in the documentation accompanying the planning application.

4.98 The next section of this report examines the retail and leisure evidence base unpinning the policies of the development plan drawing upon relevant conclusions regarding the requirement for additional retail and leisure floorspace and the health of relevant town centres.

5 RETAIL AND LEISURE EVIDENCE BASE

5.1 This section of the Statement examines the retail and leisure evidence base to the development plan in so far as it is relevant to the consideration of the application proposals.

5.2 There are a number of retail studies which have been prepared in recent years which explore shopping and leisure patterns within this part of London. The following paragraphs briefly explore the key conclusions reached by each of these studies in order to set the scene against which the proposed retail and leisure floorspace needs to be considered.

5.3 In summary these studies comprise:

- Consumer Expenditure and Comparison Goods Floorspace Need in London (October 2013 and October 2017)
- Richmond Retail Study Update 2014
- Richmond Town Centre Health Checks 2013
- 2013 and 2017 London Town Centre Health Check Analysis

Consumer Expenditure and Comparison Goods Floorspace Need In London

5.4 Experian was appointed by the Mayor to provide an update to their 2013 Study to consider the needs for comparison goods floorspace in London.

5.5 The 2017

5.6 Study concludes that if all the known retail developments in the planning pipeline are built by 2041 then London will still need 1.2 million sqm of additional retail floorspace.

5.7 On a Borough basis, the Study identifies a comparison goods floorspace requirement for Richmond upon Thames of up to 28,207sqm gross by 2036 taking into account known retail commitments. In respect of East Sheen, the Study estimates a requirement for 6,108sqm gross (2,708sqm net) comparison goods floorspace by 2036 (after known commitments).

Richmond Retail Evidence Base

5.8 The Richmond Retail Study provides a qualitative and quantitative assessment of the need for future retail and leisure floorspace within the Borough to 2029. The need for new floorspace is assessed on the basis of comparison, convenience and food and beverage expenditure. The Study also conducts an audit of centres in order to provide an assessment of their vitality and viability.

5.9 Like the assessment undertaken in 2006, updated in 2009, the Study is based upon the latest available estimates of population and expenditure for the Borough. The assessment is informed by a household telephone survey. The study area is sub-divided into seven survey zones. Zone 7 covers Mortlake and Barnes Common, Barnes and East Sheen which when taken together with Zone 6 (Kew and North Richmond) most closely reflects the adopted study area for the purposes of testing the application proposals. This approximates to a 5 ï 10 minute drive time from the application site covering the north of the borough.

5.10 Comparison goods expenditure is forecast to increase from £799.27M in 2017 to £991.75M in 2024 i.e. an increase of £192.48M. This is a very significant increase in retail expenditure some of which will translate into a requirement for new floorspace after making allowances for the increase in productivity of existing floorspace and spending on special forms of trading (i.e. non-store activity such as the internet, mail order etc) . The increase in expenditure within combined Zones 6 and 7 over the same period is forecast at £60.6M. The forecast in expenditure, after making deductions for the turnover of existing retail floorspace and commitments translates into a floorspace requirement of 11,508sqm gross by 2024 of which just 278sqm gross is attributed to East Sheen/Barnes and Mortlake.

5.11 In relation to convenience goods, the Study indicates that convenience goods expenditure within the Borough will grow from £440.11M in 2017 to £477.24M by 2024 i.e. an increase of £37.13M. Of which the growth within combined Zones 6 and 7 will be £11.39M over the same period. In contrast, East Sheen town centre is estimated as having a convenience goods turnover capacity of £52.60M in 2024. Table 12 (Appendix 20) calculates a future floorspace requirement for convenience goods of 3,636sqm gross by 2024 (after planned commitments) for the Borough. The requirement in respect of East Sheen is just 670sqm gross floorspace.

5.12 Similarly in relation to food and drink expenditure, this is expected to increase from £264.48M in 2017 to £303.63M in 2024 i.e. an increase of £39.15M of which £12.76M is accounted for by increases in expenditure within zones 6 and 7. Significantly Zone 7 has the highest expenditure per head on food and drink of the entire Borough. The floorspace requirement is for 6,512sqm gross by 2024 of which 509sqm gross is identified for East Sheen and 472sqm gross for Barnes.

5.13 The above expenditure forecasts are based upon GLA Population Projections and Experian Local Expenditure 2012 estimates (Experian Retail Planner Briefing Note 11, September 2013). The Table below provides a comparison of the rates adopted by the Study against Experianõs latest advice on expenditure growth (December 2017) excluding special forms of trading.

Source	**Convenience**						**Comparison**					
Year	2012	2013	2014	2015	2016	2017	2012	2013	2014	2015	2016	2017
Retail Study	-0.6%	-0.3%	0.1%	0.8%	0.8%	0.8%	3.2%	2.3%	2.8%	2.9%	2.9%	2.9%
Experian Retail Planner	-0.3%	-0.7%	-0.6%	-1.2%	0.6%	-0.3%	1.6%	2.5%	3.1%	4.9%	3.5%	0.8%
Change	-0.3%	-0.4%	-0.7%	-2.0%	-0.2%	-1.1%	-1.6%	+0.3%	+0.3%	+2%	+0.6%	-2.1%

5.14 As can be seen, there is some significant variance between the growth rates adopted by the Study and the latest growth estimates advised by Experian in Retail Planner Briefing Note 15 (December 2017). Generally growth in convenience goods expenditure has declined although there are recent signs that this trend has started to slow and potentially reverse through food price inflation. In relation to comparison goods expenditure the position is less clear however future forecasts of expenditure growth 2019+ indicate increased growth (1.5% in 2019 then, 2.3% to 3.2% over the period 2020-2024). Notwithstanding this, the 2014 Study provides an up to date assessment against which an assessment of the application proposals can be based.

5.15 The Study also provides a commentary on the quality and distribution of retail facilities within the Borough. In relation to East Sheen, the centre is identified as including one of only three food superstores in the borough (Waitrose). The Study notes that the five main centres within the Borough (including East Sheen) provide a good range and choice of comparison goods shopping facilities including national multiples and independent specialists. The centres are supplemented by out of centre retail provision including the Kew Retail Park which includes a range of major stores such as Marks & Spencer, Boots and Next.

5.16 Table 6.1 indicates that of the units within East Sheen, 46.5% were in use as Class A1 retail with 17.3% within Class A3/A4/A5 uses. A total of 8.8% units were reported as being vacant at the time the survey was undertaken.

5.17 The household survey identifies the Borough's retention of food and drink expenditure is very high (over 80%) and furthermore the amount of expenditure inflow from beyond the Borough is significant (>£80M).

5.18 Chapter 7 of the Study examines the position with regard to accommodating the predicted growth in expenditure which is identified and capable of supporting additional comparison, convenience and food and drink floorspace over the study period. The floorspace requirements are based upon an assumption that the Borough can maintain its existing market share of expenditure. In summary and with respect to East Sheen the requirement is for 670sqm gross convenience, 278sqm gross comparison and 509sqm gross food and drink floorspace to 2024 (subject to the various assumptions made). There are a number of sensitivities set out in the Study which might reduce the Borough's need for additional floorspace including the re-occupation of vacant floorspace within town centres.

5.19 In relation to East Sheen, paragraph 7.23 suggests that after applying an assumption regarding the take up of vacant floorspace, a potential 300sqm gross Class A1 – A5 floorspace could be accommodated at nearby Mortlake Brewery. Further commentary is set out at paragraph 7.43 which states:

> **"A significant element (over 20% - 1,000sqm) of the rest of the London Borough of Richmond upon Thames floorspace projection relates to Class A3 to A5 uses. The river related development at the Mortlake Brewery site should be well placed to accommodate some of this projection."**

5.20 Appendix 5 of the Study provides an audit of the key centres within the Borough. East Sheen is identified as having a total of 215 units. The table below provides a summary of provision (as at 2014)

Type of Unit	Units 2014	%
Comparison Retail	82	38.1
Convenience Retail	18	8.4
A1 Services	40	18.6
A2 Services	19	8.8
A3/A5	32	14.9
A4 pubs/bars	5	2.4
Vacant	19	8.8
Total	**215**	**100**

5.21 The audit notes that the centre is attractive and has a low number of vacant units. The centre is stated to suffer from being a linear centre located on a busy road which can present a significant barrier to pedestrian movement. A lack of car parking was also identified by stakeholders. The centre has a good range of shops including a mix of national multiples and independents. These observations are very comparable to the RPS survey of the centre conducted in July 2017.

5.22 Similar observations are made in the Town Centre Health Checks 2013 report. This report conducts health checks for the main town centres within the London Borough of Richmond. The report feeds into the work conducted by the Mayor in relation to the London Town Centre Health Check Assessments. The report includes health checks for East Sheen and Barnes. These health checks date from 2012 but nevertheless provide a usual basis upon which to assess the potential effects of the application proposals.

5.23 East Sheen is noted to have circa 35,000sqm floorspace and fewer national multiple retailers than similar centres but with a strong independent comparison goods retail offer. Trend data shows an increase in the number of shops within the centre and a reduction in vacancy rates. Conversely prime rents are recorded as having fallen and there has been a reduction in footfall.

5.24 In relation to Barnes, the centre is noted to have a significantly higher number of outlets in A2 use and those in the food and drink sector. The vacancy rate has been historically low although was, like most other centres, subject to significant increases during the recession with a recorded vacancy of 6.3% in 2012. Barnes is considered to provide well for local shopping and has a full range of shops and services. In particular Barnes has a strong independent non-food shopping offer and an established restaurant/cafe sector which provides a destination offer. The centre has an attractive and well maintained environment.

5.25 In summary, the above commentary indicates that there is expected to be modest growth in available expenditure (having regard to the various assumptions adopted by the Retail Study) capable of supporting new retail and leisure floorspace within the Borough including at East Sheen and Barnes. In particular the former Stag Brewery is identified as being well placed to meet some of this need. It is notable that the Study does not however envisage significant new residential led development on the application site. East Sheen and Barnes are healthy centres.

5.26 Having regard to the above summary of the key findings of the retail and leisure evidence base, the next section of this report records the RPS survey findings in relation to local retail and leisure facilities including those located within town centre proximate to the application site.

6 LOCAL RETAIL AND LEISURE PROVISION

6.1 The proposed retail and leisure uses will primarily serve the day to day needs of the future residents of the scheme. They are directly supported by expenditure that will be generated by the new residents, the local working population and visitors. Nevertheless, in order to fully test the potential effect of the proposed retail and leisure floorspace it is necessary to build a full understanding of the type and nature of existing retail and leisure facilities within the local area. The following paragraphs provide a summary of local retail and leisure provision.

6.2 There are a limited number of local retail and leisure facilities located in close proximity to the application site (approximate 5 – 10 minute drive time, equivalent to zones 6 & 7 of the Council's Retail Study area). Such facilities are comprised within four main centres, namely:

- East Sheen (district centre)
- Barnes (local centre)
- Kew Gardens Station (local centre)
- White Hart Lane (neighbourhood centre)

6.3 RPS conducted surveys of these centres in July 2017. The key findings of these surveys are summarised below and in the documents which comprise Appendix 1.

6.4 The surveys inform the assessment of each centre's vitality and viability consistent with the methodology set out within the NPPF/NPPG regarding the potential effects of application proposals. Furthermore the surveys inform considerations regarding the role and function of each centre and their position within the centre hierarchy.

6.5 East Sheen is the largest centre and located nearest to the application site. It performs the role and function of a district centre. The centre is linear in form centred upon the Upper Richmond Road West (South Circular) and Sheen Lane. The centre is anchored by a large Waitrose store which benefits from having its own customer car park. The centre has a wide range of shops and service uses and there are a number of restaurants, cafes and pubs which support an established evening economy. There is a good mix of national multiple and independent retailers. The centre is heavily trafficked which can impede pedestrian movement within the centre. The centre has a particular concentration of shops selling homewares, decor and soft furnishings. The centre is popular and there are few vacancies. The secondary shopping area extends north along Sheen Lane at terminates at Mortlake railway station within 160 metres of the application site. The centre is healthy and performs its designated role in accordance with the town centre hierarchy.

6.6 Barnes is a local centre situated to the east of the application site. The centre is focused upon Barnes High Street and Church Street in two distinct areas. The centre provides for the day to day, predominately convenience goods needs of local residents. There is a particular focus upon the provision of a range of restaurant and cafe uses. Significantly Barnes has a small high quality and popular local cinema (Olympic Studios). There are a limited number of national multiple retailersô present. The centre has an attractive environment and the retail offer is enhanced through the provision of a number of high quality independent retailers and attractive shop fronts. The centre has a low number of vacancies although this has increased in recent years. The centre is popular and supports a cafe type culture and varied evening economy which attracts visitors from a wider area. The centre is healthy with a good mix of retail, leisure and service uses and has a strong evening economy.

6.7 Kew Gardens Station local centre is located to the west of the application site. It is a compact centre focused around the station with retail frontages to Station Approach and Station Parade. It is an attractive centre which not only serves the day to day needs of local residents but also benefits from significant passing trade provided by visitors alighting from the station and travelling to Kew Gardens. The centre is comprised of a significant number of quality independent retailers and a limited number of national multiple retailers. The centre has an attractive appearance with high quality shop fronts. There are no vacant units within the centre at present. A clear indication of its popularity and strength. The centre is healthy and distinct from the proposed retail/leisure offer of the application proposals.

6.8 Finally, White Hart Lane is a small linear centre comprised of three distinct areas situated along White Hart Lane. The centre performs the function of a small neighbourhood centre serving the day to day needs of local residents in this part of the borough. The centre has just one national multiple retailer (Sainsburyøs Local) which provides the main retail anchor. All the other units are occupied by independent retailers and service providers. There is a good mix and range of retail, leisure and service uses including some specialist operators. There are very few vacant units. The various indicators point to the centre being healthy.

6.9 East Sheen and Barnes town centres have previously been subject to surveys undertaken by the Council which inform the retail and town centre evidence base (referred to in the previous section of this Statement).

6.10 In addition to town centres, there are a limited number of large out of centre retail facilities in the wider area including the Kew Bridge Retail Park which includes stores operated by Marks & Spencer, TK Maxx, Boots, Gap, Mothercare, Clarks and Next. There is also a large Sainsburyøs superstore situated at the junction of the Lower Richmond Road and Manor Road, opposite to which is a Pets at Home and Homebase store. These retail facilities are of a different scale and format to those planned for the application site.

6.11 Appendix 1 provides a summary audit of each of the centres having regard to the observations that were made as part of the field survey work. As the analysis shows, these centres have a diverse range of uses and in contrast few vacant units. They are popular with local residents. Vacancy rates are below that of the national average. Each of the centres is considered to be healthy and viable with good signs of vitality enhanced by a significant number of local cafes and restaurants and specialist retailers.

6.12 GOAD Plans were obtained for East Sheen and Barnes town centres (last surveyed by GOAD in October 2015). In relation to East Sheen, it is notable that the GOAD plan excludes the units located to Sheen Lane which forms part of the designation shopping frontage of the town centre. RPS has updated the GOAD plan for each centre and the changes between the 2015 GOAD and

2017 RPS survey are shown in the schedules which are appended to this Statement (Appendix 2 refers).

6.13 GOAD Plans are not available for either Kew Gardens Station or White Hart Lane. Even so, the RPS survey of these centres is provided at Appendix 3. These centres are composed of shops and services which are aimed at serving the day to day needs of immediate residents. They include a limited range of small convenience shops, cafes, estate agents, dry cleaners and newsagents. Shops are small and predominately independently operated although there are a limited number of high street multiples present.

6.14 The table below provides a summary of the key national multiple retailers having representation in each of the centres. As can be seen, unsurprisingly the larger centres have the greater range of national retailers.

Centre	Key National Multiples
East Sheen	Waitrose, Tesco Express, CarpetRight, Boots, Costa Coffee, Barclays, Superdrug, W H Smith, Robert Dyas, Benson Beds, Whistles, Caffe Nero, HSBC, Oliver Bonas, Pizza Express, Farrow & Ball
Barnes	Sainsbury's Local, Caffe Nero, Jigsaw, Londis, Fired Earth, Starbucks, NatWest, Marks & Spencer Food
Kew Gardens Station	Tesco Express, Pizza Express, Oddbins, Starbucks, Lloyds
White Hart Lane	Sainsbury's Local

6.15 A significant number of the national multiple retailers identified are leisure operators such as cafes and restaurants.

6.16 There are also a good range of high quality independent outlets within each of the centres. A summary of these is provided in the table below.

Centre	Key Independents
East Sheen	Four Seasons (blinds), Ron's Fishing Tackle, Action Bikes, T Swatland Butcher, One Small Step One Giant Leap (shoes), jut Write (stationery), Pandemonium (toys), Pearson (cycles), Sheen Sports Goods,
Barnes	Pets Corner, Stones (Jewellers), J Seal Butcher, Cook (delicatessen), Two Peas in a Pod (green grocer), Nina (women's wear), Luma (soft furnishings)
Kew Gardens Station	The Good Wine Shop, Oliver's Wholefood Store, The Kew Bookshop, Pether (butchers), Kew Gardner (flowers), Mia Wood (Women's clothing)
White Hart Lane	Marco Tripoli (Women's clothing), The Waggery (Dog grooming), True Love (Women's clothing), Taylor & Marr (furniture)

6.17 The main leisure offer of the various town centres is summarised in the table below. As can be seen there is an extensive and diverse offer provided in the form of pubs, restaurants and local cafes.

Centre	Key restaurant/cafe/pub/other leisure offer
East Sheen	Pickle and Rye, Euro Cafe, Sheen Fish Bar, Coffee and Cake, Sheen Cuisine, Robvin's Cafe, Lazeez Deli, Canham, Secret Recipe, Malana, Fitness Centre for Women, Yoga Hub, The Bear Kick, Gail's Bakery, Coffee & Co., Pizza GoGo, Leonardo Wine Bar, Tom Yum Goong, Costa Coffee, Pig & Whistle PH, Caffe Nero, The Hare & Hounds PH, Dominos Pizza
Barnes	Olympic Studio Cinema and Cafe, Bulls Head PH, Coach & Horse PH, Pizza Express, Caffe Nero, The Sun Inn PH, Wildwood Kitchen, The Red Lion, Starbucks, Sonnys Kitchen, Alma Cafe,
Kew Garden Station	Cafe Torelli, Pizza Express, Antipodea, Ma Cuisine, Tap on the Line, The

	Glasshouse, Kew Green House, Starbucks
White Hart Lane	The Corner Cafe, Dolce Crema, Sakunthala's, Orange Pekoe, Hawei, Annes, Gusto and Relish, The Tree House

6.18 In terms of vacant units, the table below records the vacancy rate of each centre as at July 2017.

Centre	Number of Vacant unit	% Vacant Units
East Sheen (inc Sheen Lane)	17	6.8%
Barnes	10	8.3%
Kew Gardens Station	0	0
White Hart Lane	3	7%

6.19 As can be seen the level of vacant units is generally low and is an improving position upon the surveys undertaken for the Council in 2012 and 2014 referred to in the previous section of this Statement. Some of the vacant units appear to be short term and are currently subject to renovation works etc. The vacancy rate for East Sheen has decreased slightly from 19 to 17 units over this period. Whilst this represents a snap shot in time, there is no evidence to suggest that the trend is anything other than an improving vacancy rate.

6.20 The vacant units comprise a variety of different premises. Appendix 3 provides details of the number and location of vacant units within each of the centres. The majority of these are small units and do not detract from the overall vitality and viability of the centre. Indeed, it is important to have a supply of some vacant units in order to attract new operators to the centre and allow established operators to relocate as the needs of individual businesses dictate.

6.21 The largest vacant unit within East Sheen was identified as the former HSBC bank on Upper Richmond Road West at 230sqm. Similarly, the former bank premises at 15 Barnes High Street was the largest vacant unit within Barnes. There were no vacant units in Kew Gardens Station and only 3 in White Hart Lane, the largest of which comprises approximately 60sqm floorspace (no. 10 The Broadway).

6.22 Barnes has a total of three vacant units which have been brought back into productive use since the 2015 GOAD survey. Conversely 7 units have become vacant reflecting a net increase of 4 units. Even so, the overall vacancy rate remains low and below the national average. Similarly, in relation to East Sheen a total of 14 previously vacant units have been brought back into use with just 6 shop units becoming vacant - a reduction of 8 units between the GOAD survey and RPS survey. It is of course important to recognise that surveys represent a snap shot of the centre at the time. There is however no indication to suggest the level of vacant units is a cause for any concern either now or in the future within any of the centres surveyed.

6.23 The table below summarises the overall position regarding vacant units in each of the centres as at July 2017.

Centre	Number of Vacant units	Vacant Floorspace sqm gross*	Largest Vacant Unit sqm gross*
East Sheen (inc Sheen Lane)	17	1,879	230
Barnes	10	1,240	220
Kew Gardens Station	0	0	0
White Hart Lane	3	156	60

*RPS estimate

6.24 As referred to above, Barnes is the only local centre which contains a cinema. In the wider area, the nearest cinema provision can be found at Putney (Odeon) and Richmond (Odeon and Curzon).

6.25 The Barnes cinema is operated by Olympic Studios. It is a very popular boutique style cinema and provides a high quality specialist offer including a restaurant, luxury seating and private members club. The cinema has 2 screens with screen 1 having an auditorium with 130 seats and the smaller screen 2 has 71 seats. An overview of the cinema's offer is set out in Appendix 5.

6.26 In contrast the Odeon at Putney High Street provides a more mainstream cinema offer. The cinema operates three screens providing 258, 222, 105 seating capacities. The cinema is situated on the busy High Street with a Costa Coffee and Thai Square Restaurant adjacent to the cinema.

6.27 The largest cinema serving the north of the borough is found in Richmond town centre in the form of an Odeon which has 7 screens with a total seating capacity of 1,006. The cinema is located adjacent to a wide ranging food and beverage offer provided in the form of Costa Coffee, Nandos, GBK, Pizza Express and Strada. There is also a smaller single screen Curzon cinema located within Richmond town centre providing a seating capacity for 144 people. The cinema has a small bar.

6.28 The table below summaries the local cinema provision.

Cinema	**No Screens**	**No. Seats**	**Average Adult Ticket Price**	**Type**	**No Films per day**
Barnes Olympic Studios	2	201	£16	Luxury/Boutique	5
Odeon Putney	3	585	£11	Mainstream	8
Odeon Richmond	7	1,006	£13.75	Mainstream	9
Curzon Richmond	1	144	£15	Boutique	3

6.29 As can be seen, admission prices are higher for boutique cinemas.

6.30 In summary, the above observations demonstrate that each of the four centres are healthy with good signs of vitality. Each performs its designated role within the centre hierarchy. In all cases the level of vacant units is low and well below that of the national average. With the exception of East Sheen the centres are small and primarily serve the day to day needs of the immediate residential area. Barnes has a specialist leisure offer with an attractive array of restaurants, cafes and the only cinema within the adopted study area. Kew Gardens local centre benefits from passing visitor trade associated with nearby Kew Gardens.

6.31 All of the centres include a diverse range of retail, leisure and services facilities. East Sheen has a significant number of national multiple retailers and provides for main and top up food shopping trips. Whilst each of the centres are located within close proximity to each other, each has its own identity and provide a different role and function. The application proposals will complement that provision and provide a different retail and leisure experience to that of established nearby centres.

6.32 In accordance with national and local policy requirements, section 8 of this Statement considers the potential effect of the application proposals upon these centres having regard to the above assessment of the vitality and viability of and the retail evidence base.

6.33 The next section of this Statement examines the proposals specifically in terms of the sequential test.

7 SEQUENTIAL TEST

7.1 The NPPF requires proposals for retail and leisure uses to be assessed in terms of the sequential approach to site selection except where they are 1) located within a town centre or 2) accord with an up to date local plan.

7.2 The purpose of the sequential test is to direct new retail and leisure uses to town centres first in order to support their vitality and viability. Local planning authorities are required to plan positively to meet future retail and leisure needs through the allocation of suitable sites and premises within town centres and elsewhere. This process may result in the identification and allocation of significant development opportunity sites located outside town centres where it is preferable to secure a mix of uses which promote the principle of sustainable development and the creation of lifetime neighbourhoods. The application site is one such example, promoted through the Local Plan.

7.3 The NPPG advises that the sequential test should be proportionate and appropriate for the given proposal (Paragraph 010), and applied according to the market requirements that a proposal is intended to serve. In this case, the proposed retail and leisure uses are intended to serve a local need arising from the existing residential population and substantial planned new residential community for the application site.

7.4 The application site is not located within a defined town centre. It is an edge of centre site located 160 metres from the defined shopping area of East Sheen district centre.

7.5 The application site forms part of a designated óArea of Mixed Useô where óappropriateô retail and leisure uses are supported. óAppropriateô is not defined however, the scale of retail and leisure proposals should support vibrancy and vitality and not harm other town centres (policy DM TC2).

7.6 Significantly, the application site is specifically identified as a development opportunity site by the Unitary Development Plan and the draft Local Plan. The latter has reached an advanced stage of formulation without objections to the principle of mixed use development on the site and therefore significant weight can be afforded to the allocation of the site.

7.7 The Councilõs vision for the site is set out within an adopted Development Brief which confirms a range of retail, leisure and other commercial uses will be supported as part of a mixed use scheme including high density residential development. Proposed amendments to the draft Local Plan confirm that regard should be had to the Development Brief. The application proposals fully accord with the principle of development and the mix of uses indicated for the site.

7.8 The Councilõs draft Local Plan proposes to take forward the allocation of the site consistent with the Development Brief for mixed use development including a range of retail, leisure and commercial uses and other óemployment generatingô uses. The latter is not defined but is not confined to just Class B uses.

7.9 It is clear that the proposed retail and leisure uses therefore accord with the broad policy allocation of the site in the development plan (adopted and emerging). The application proposals are therefore not required to satisfy the sequential test as they accord with an up to date local plan site allocation.

7.10 The allocation of the site is subject to a number of requirements significantly including;

- the need to ensure that any retail and leisure uses do not compete with East Sheen district centre
- serve a local need; and
- provide a ónew centre and heart to Mortlake Villageô

7.11 These requirements are consistent with the Applicantøs proposal for the former Stag Brewery. Even so, the next section of this Statement specifically considers the potential effects of the proposed retail and leisure uses on town centres. The primary concern of policy is however the proposed development affects East Sheen given its close proximity and linkages to the application site.

7.12 The policy allocation of the site does not specify the quantum of retail and leisure floorspace which may be acceptable. Instead the policy is framed in terms of óappropriateô retail and leisure uses, the principle aim of which is to ensure that development does not harm designated town centres.

7.13 óAppropriateô is of course open to interpretation. Even so, appropriate in this context must mean any retail and leisure uses, in the first instance, are geared towards meeting the needs of the local residential and working populations or the area (existing and proposed).

7.14 The impact test is key to demonstrating the appropriateness of the proposed retail and leisure uses. Reasonably, retail and leisure development that is of an inappropriate scale is likely to have significant adverse effects on town centres and potentially the network of centres. Such assessments need to consider both quantitative and qualitative impacts including reference to the format, scale and nature of the proposed retail and leisure uses and how these complement/compete with town centres.

7.15 Locating the proposed retail and leisure uses elsewhere is not an option. The range and mix of uses is essential to the siteøs development as a sustainable new community. The principle of the siteøs development for a mix of uses is enshrined with the development plan.

7.16 Even if the sequential test were to apply, there is no requirement to consider the ódisaggregationô of the proposed scheme in applying the sequential test. Indeed, this was confirmed by the Governmentøs response to a CLG Select Committee Inquiry into the Operation of The Framework on 27 February 2015.

7.17 The NPPG advises local planning authorities to set ópolicies to apply the sequential test to proposals for main town centre uses that may come forward outside the sites or locations allocated in the Local Planô (paragraph 2B-009). In this context, it is clear that the application of the sequential test to the proposed development on the application site does not apply given that it is specifically allocated for a mix of uses including retail and leisure uses.

7.18 The sequential test has been the subject of a number of recent Court Judgements and Secretary of State appeal decisions including:

- Tesco Stores Ltd v Dundee City Council (2012)
- Secretary of State Call-in Decision at Rushden Lakes (2014)
- Aldergate Properties Ltd v Mansfield District Council (2016)

7.19 The key conclusions reached by these decisions relevant to the consideration of the application proposals can be summarised as follows:

- The sequential test relates to what is proposed by the application and whether it can be accommodated on an alternative site
- The sequential approach does not relate to need or deficiencies in retail provision and does not require a suitable site to be one that can only accommodate a proposal if the proposal is altered / reduced (setting aside a general requirement for flexibility)
- The question is whether an alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit the alternative site
- Flexibility must be applied in relation to format and scale when undertaking the sequential test
- The proposal as a whole should be considered. The proposal should not be disaggregated
- Alternative sites should be available now and not at some point in the future
- The business needs of a particular development are material considerations to be taken into account when assessing the suitability of alternative sites, but not to the extent that it should determine the way in which the sequential search area is defined
- The area and sites covered by the sequential assessment should not be dependent upon the operator but rather the nature of the proposals i.e. It should be conducted in an operator blind manner.

7.20 Having regard to the above, as evidenced in the previous section of this Statement, the availability of vacant premises within nearby town centres is limited and could not accommodate the entirety of the proposed retail and leisure floorspace even when applying the necessary flexibility required by the NPPF.

7.21 East Sheen had less than 1,900sqm gross vacant floorspace in July 2017. From a purely retail and leisure perspective (i.e. excluding all the other uses forming part of the overall scheme of development), this compares to the proposed maximum 2,500sqm Class A1 Retail, 2,200sqm cafes/restaurants Class A3 and 1,600sqm drinking establishments (Class A4) and the cinema proposed by the Applicant for the application site. Similarly, there are no sites within East Sheen that are suitable and available to accommodate the retail and leisure elements of the application proposals. The scale of development is unsuitable within the other smaller centres examined.

Similarly, there are no sites suitable and available within local centres to accommodate the application proposals.

7.22 As previously explained, the application proposals provide for the comprehensive mixed use redevelopment of the former Stag Brewery. The range of retail and leisure uses proposed directly support the substantial planned new residential community of the scheme in addition to the established local community. The design and layout of the scheme maximises the site's riverside setting and re-establishes connections between the river, Sheen Lane and East Sheen.

7.23 The proposed retail and leisure uses are configured to provide a range of active frontages and promote lifetime neighbourhoods and are consistent with the principle of sustainable development in accordance with national planning policy objectives and the development plan. The proposals will have substantial economic, social and environmental benefits consistent with the NPPF.

7.24 Against this policy background, the proposed main town centre uses (namely the retail and leisure uses) which form an integral and important part of the overall scheme should not need to be assessed against the sequential test.

7.25 The safeguards proposed by the Applicant in terms of limiting the amount, type and nature of the proposed retail and leisure floorspace will ensure that the retail and leisure floorspace remains appropriate and true to the Vision for the site i.e. it serves a local need and complements the retail and leisure offer of nearby centres including East Sheen district centre.

7.26 The quantum and type of retail and leisure floorspace is both appropriate and necessary and the floorspace cannot be disaggregated. Indeed, the sequential test prescribed by the NPPF does not support disaggregation. Instead, as confirmed by the Courts, the sequential test should be applied with realism and flexibility.

7.27 The NPPG provides a checklist setting out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:

- **with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. Any associated reasoning should be set out clearly.**

- **is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.**

- **if there are no suitable sequentially preferable locations, the sequential test is passed.**

7.28 The RPS survey of East Sheen town centre confirms that there are no opportunities to accommodate the proposed retail and leisure floorspace within premises and sites even in a significantly flexible form. To do so would be counterproductive to the aims of securing an appropriate scheme of redevelopment for the former Stag Brewery including the provision of active street frontages and a new centre and heart for Mortlake Village consistent with the Council's policy vision for the area. The application site is within easy walking distance of Mortlake railway station and East Sheen district centre, it is therefore an accessible location by modes of public transport, walking and cycling.

7.29 In summary, the application site is allocated for a mix of uses including retail and leisure uses within the development plan and supporting planning policy documentation. The draft Local Plan reinforces this allocation. There have been no objections raised in relation to the principle of retail and leisure uses on the site. Given the advanced stage of preparation reached and the lack of objections, significant weight should be afforded to the proposed allocation of the site.

7.30 In conclusion, the key test the application proposals must satisfy is the impact test. If the proposals do not have a significant adverse effect upon town centres then the sequential test must also be satisfied as the proposals will be 'appropriate' and therefore in accordance with the policy allocation of the site

7.31 The next section of this Statement considers the potential retail and leisure effects of the application proposals upon town centres, in particular East Sheen district centre.

8 IMPACT ASSESSMENT

8.1 This section of the Statement assesses the proposed retail and leisure elements of the application proposals in order to ascertain whether there would be any significant adverse effects on town centres.

8.2 The potential effects are considered having regard to the maximum amount of floorspace permissible, as proposed to be controlled by the Applicant, namely:

- 2,500sqm Class A1 Retail
- 2,200sqm Class A3 Restaurants/cafes
- 1,600sqm Class A4 Drinking Establishments
- A cinema

8.3 An overall cap on the amount of flexible floorspace is proposed at 4,664sqm GIA. The aggregation of the maximum floorspace allowances described above would exceed the floorspace cap however this is designed to provide the scheme with sufficient trading flexibly.

8.4 The proposed Class A1 retail floorspace is perhaps the most sensitive of the proposed retail and leisure uses. Accordingly, the assessment set out below assumes the maximum 2,500sqm Class A1 retail floorspace will be provided. The balance of the floorspace is assumed to be entirely for Class A3/A4 purposes (i.e. up to 2,164sqm). This is a very robust basis upon which to test the proposed retail and leisure uses. In reality the amount of Class A1 and A3/A4 uses will be less. The minimum amount of Class A1 floorspace is also proposed to be controlled and is set at 1,255sqm GIA.

8.5 The above scenario takes no account of the potential for the flexible floorspace to include a range of Class B1 (up to 2,000sqm), community uses Class D1 (1,148sqm), a boathouse (up to 351sqm) and financial and professional services Class A2 (up to 200sqm). These uses total 3,699sqm GIA floorspace. The realisation of at least some of these uses would significantly reduce the amount of floorspace given over to Class A1, A3 and A4 uses. Consequently, whilst the assessment is undertaken on robust worst case scenario, in reality impacts will be considerably over stated given the need for a mix of different uses is likely to be played out commercial terms.

8.6 The assessment has been conducted on a qualitative and quantitative basis having particular regard to the retail and leisure evidence base and the RPS survey of centres undertaken in July 2017. The centres examined include East Sheen (district centre), Barnes (local centre), Kew Gardens Station (local centre) and White Hart Lane (neighbourhood centre). The commentary provided in the previous sections of this report indicate that each of the centres is healthy and performing their expected role and function with the hierarchy of centres.

8.7 National planning policy requires an assessment of the potential effects (impact test) where proposed retail and leisure uses such as these are not located in a town centre or do not accord with an up to date plan. The national default threshold for testing impact is set at 2,500sqm. The statutory development plan does not currently set a lower threshold for testing impact although the draft Local Plan proposed to set this at 500sqm. Even so, the level of impact arising from a given proposal depends upon the particular circumstances, for example, the type and nature of floorspace proposed and whether this is distinct from provision within local town centres and the extent to which schemes are supported by the growth in available expenditure etc. In this case, it is significant that the proposals include the provision of a substantial number of new residential units. The future residential population will directly support the proposed retail and leisure uses as well as local town centres.

8.8 At the local level general retail policy requires retail and leisure proposals to be in óscaleô with centres to ensure that they do not harm the hierarchy of centres prescribed by the London Plan. The application site is of course not located within a ócentreô Accordingly the scale test does not apply. The allocation of the site provides clear policy support for retail and leisure uses on the application site. This includes an aspiration to ócreate a new centre and heart for Mortlake Villageô

8.9 For the reasons already discussed, the local policy designation of the application site is silent upon the óappropriateô quantum of retail and leisure floorspace that may be acceptable. The Councilôs Retail Study specifically identifies the application site as a development opportunity which is capable of meeting the general need for new Class A floorspace including shops, restaurants, cafes and retail uses. Even so, at the time the Study was prepared the application proposals would not have been known to the consultants and in this respect the Study does not take into account the significant number of new residential units being proposed for the former Stag Brewery.

8.10 óAppropriateô retail and leisure uses are defined by the policy allocation of the application site in the follow terms:

- They should serve primarily local needs and not create a retail destination in their own right
- They should not compete with East Sheen district centre

8.11 The proposed retail and leisure uses have specifically been designed having full regard to these policy requirements.

8.12 Notwithstanding the allocation of the application site, the Applicant has agreed to conduct an assessment of the potential effects of the proposed retail and leisure development upon local town centres having regard to the requirements set out at paragraph 26 of the NPPF as if they apply to the application proposals, namely:

- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.

8.13 There are no planned or committed schemes of development within nearby local centres which would be harmed by the application proposals.

8.14 The assessment examines a ‘design year’ for the scheme of 2024. This reflects the anticipated build programme of the scheme. The design year also correlates well with the available data contained within the Council’s retail and leisure evidence base in respect of population and expenditure projections. 2024 provides a robust assessment year in order to determine whether the proposals would have any significant adverse effects.

8.15 For the reasons previously explained, available expenditure on comparison and convenience goods and on food and beverage will have grown in excess of the rates adopted by the Council’s Retail Study. Such expenditure will benefit existing centres and other retail and leisure facilities and also support the provision of some additional floorspace even after deductions for improving floorspace efficiencies and increases in special forms of trading.

8.16 The assessment is duly set out below and focuses upon potential effects on East Sheen district centre (the principal policy concern) but also considers the following centres:

- Barnes (local centre)
- Kew Gardens Station (local centre)
- White Hart Lane (neighbourhood centre)

8.17 The primary focus of Local Plan policy is to afford protection to East Sheen. The assessment of the proposals upon a wider range of local centres therefore takes a very robust approach.

8.18 The allocation of the application site in the Local Plan is framed in terms of ‘appropriate’ retail and leisure uses. Policy therefore requires an assessment of the retail and leisure proposals to ensure that they are ‘appropriate’ in relation to their size, nature and the extent to which they would compete with East Sheen.

8.19 The proposed retail and leisure uses are intended to support the proposed new residential community as well as the existing local residential population and workforce. The Vision for the site is that the types of retail and leisure facilities will complement East Sheen rather than detract from the centre. There is significant potential for the future residential population of the scheme to benefit East Sheen in terms of expenditure directly supporting the turnover of the centre.

8.20 In order to provide a new centre for Mortlake it is necessary to provide a certain quantum of floorspace to ensure the necessary attraction and commercially viability i.e. a place where people want to visit and spend their leisure time and a place where retailers and leisure operators are confident that their investment in new businesses is secure. This in part relies upon the effective management of available floorspace to ensure a balance and mix of uses which in turn creates a vibrant and successful scheme that fully embraces the opportunities afforded by the site’s river side setting and proximity and linkages with nearby town centres.

8.21 The Applicant is proposing a range of control mechanisms to deliver a suitable mix of retail and leisure uses where no single use is dominant. As evidenced above, under the proposed controls the amount of Class A1 retail floorspace could be as little as 1,255sqm GIA floorspace (up to 2,500sqm). A similar position exists in relation to Class A3/A4 uses.

8.22 The scheme will generate a significant number of new employment opportunities. The scheme will also result in a substantial new residential population (up to 1,850). It is therefore important that as part of the proposed mixed use development that a range of complementary and supporting ancillary uses are provided, for example, local shops, restaurants and cafe facilities. These uses will enliven the public spaces and will also benefit local residents.

8.23 A significant proportion of the turnover of the proposed retail and leisure business will be supported by the expenditure generated by the future residents of the scheme and the local workforce. In addition, given the siteĝs riverside location, the proposed retail and leisure uses will be attractive to existing local residents and will draw some visitors from a wider area particularly in relation to the evening economy.

Proposed Class A Uses

8.24 The proposed Class A uses comprise up to 4,664sqm floorspace including retail (Class A1 ï comparison and convenience goods), Class A3 (restaurants and cafes etc) and Class A4 (drinking establishments) uses. The Class A uses will be located at ground floor level of blocks 2, 5 ï 8 and 10-12. These are exactly the types of supporting uses envisaged by the policies of the development plan and will help to enliven frontages and public spaces within the scheme.

8.25 Putting the application proposals into context, East Sheen town centre comprises 34,900sqm gross Class A floorspace (Town Centre Health Check 2013). On this basis the proposed Class A floorspace (maximum 4,664sqm assuming all floorspace is Class A) the proposals represents (at most) 13.6% of the existing floorspace located within East Sheen town centre. In this context it is clear that this scale of development would not directly compete with shops and services in East Sheen town centre. They are quantitatively and qualitatively different retail/leisure offers.

8.26 The proposed Class A floorspace (up to 4,664sqm GIA) will be provided in the form of a range of different unit sizes. A minimum of 50% of the flexible uses floorspace being provided in the form of Class A1 floorspace within the proposed High Street Zone (minimum 1,255sqm). The units will generally be small but with some larger ánchorôunits. Block 2 is the largest block proposed to comprise flexible uses (including Class A uses) at 670sqm floorspace. Many of the blocks (including Block 2) have dual frontages and therefore readily lend themselves to occupation by a range of operators.

8.27 In order to ensure a range and mix of uses, the Applicant is proposing to limit the amount of floorspace to 2,500sqm for Class A1 uses, up to 2,200sqm for Class A3 uses and up to 1,600sqm Class A4 thereby ensuring the overall quantum and type of floorspace is not dominated by a single use or occupier.

8.28 It is clear that the nature of the proposed Class A floorspace is appropriate and of a scale that should not give rise to any concerns, for example in terms of the vitality and viability of East Sheen town centre. Other nearby centres including Barnes, White Hart Lane and Kew Gardens provide a different role and function and serve a much more localised catchment area than East

Sheen. These centres are popular and have low vacancy rates. They are healthy and would not be subject to any significant adverse effects.

8.29 The proposed Class A floorspace (up to 4,664sqm) is clearly ancillary to and supports the main use of the proposed development for residential purposes. The A1 retail floorspace equates to between 0.8% and 1.6% of the overall masterplan floorspace total. The nature of the proposals mean that they are unlikely to divert trade away from any other centre and the fact that they will primarily serve the new residential population generated by the scheme.

8.30 East Sheen and to a lesser extent, Barnes provides a range of Class A3 restaurants, cafes and Class A4 public houses. The Town Centre Health Check 2013 indicates (at the time of the survey in May 2011) that these uses occupied 5,580sqm floorspace within East Sheen and 3,640sqm floorspace in Barnes. As evidenced by the RPS surveys of these centres, the food and beverage offer within each centre is strong and these establishments are frequented by local people living and working within the area. The presence of a boutique cinema in Barnes provides a wider appeal which draws people from further afield and enhances the evening economy. In contrast the application proposals could provide up to 3,800sqm floorspace (Class A3 ï A4). However with an overall cap on flexible floorspace proposed at 4,664sqm and a minimum 50% of flexible floorspace for Class A1 purposes (1,255sqm), together with the need to provide a mix and range of uses means that it is very unlikely that 3,800sqm of Class A3 ï A4 floorspace will in reality be delivered.

Quantitative Assessment

8.31 The Councilõs Retail Study provides estimates of population and expenditure growth for the period 2014 ï 2029 for the Borough. The study area is divided into 7 zones. Zone 7 relates to Barnes and East Sheen (and also includes White Hart Lane). Kew Gardens Station local centre is included within Zone 6 (Kew / North Richmond) and is more distant from the application site.

Available Expenditure & Turnover of Centres

8.32 The table below provides a summary of expenditure estimates for retail (convenience and comparison goods) and food and beverage (cafes, restaurants, drinking establishments).

Year	Expenditure Type (£ per person)		
	Convenience	**Comparison**	**Food & Beverage**
2017	2,384	4,515	1,550
2024	2,410	4,709	1,593
2029	2,484	5,381	1,708

Richmond Retail Study 2014 (Appendix 2, 3 and 4)

8.33 As can be seen, expenditure per head is forecast to increase for each category over the period 2017 ï 2024. Notably, Zone 7 has the highest expenditure per head of any zone for convenience, comparison goods and food and beverage expenditure.

8.34 The total available expenditure by category of goods within zone 7 is recorded in the table below.

Year	Total Expenditure £M			
	Convenience	Comparison	Food & Beverage	Total
2017	£79.37M	£150.31M	£51.59M	£281.27M
2024	£86.32M	£186.98M	£59.35M	£332.65M
2029	£91.49M	£220.84M	£65.22M	£377.55M
2017 - 2024	+£6.95M	+£36.67M	+£7.76M	+£51.38M

Richmond Retail Study 2014 (Appendix 2, 3 and 4)

8.35 The Retail Study provides estimates of the turnover of East Sheen town centre according to the different categories of expenditure. These are summarised in the table below.

Year	Turnover of East Sheen by Expenditure Type (£M)			
	Convenience	Comparison	Food & Beverage	Total
2017	£48.24M	£51.12M	£23.72M	£123.08M
2024	£52.60M	£63.61M	£27.27M	£143.48M
2029	£55.25M	£74.80M	£29.88M	£159.93M

Richmond Retail Study 2014 (Appendix 2, 3 and 4)

8.36 As can be seen the turnover of East Sheen is expected to grow over the period 2017 ï 2024 by £20.4M to £143.48M in 2024. As identified below, this is very similar to the potential turnover of the application proposals (£20M in 2024). As the previous sections of this Statement identify, East Sheen is a healthy centre at the base year (2017). If the entire turnover of the application proposals were to be diverted from the centre (at the design year) then the centre would simply continue to trade at its 2017 ôhealthyôlevel without any adverse effects. Significantly this has no regard to the spending of the future residential population of the proposed scheme. Further analysis on this is provided below.

8.37 Given their limited local attraction, comparable estimates for Kew Gardens Station and White Hart Lane are not provided.

8.38 In relation to Barnes, food and beverage expenditure within the centre is estimated at £22.19M in 2017, rising to £25.51M in 2024 and £28.02M by 2029 demonstrating that the turnover of Barnes (food and beverage use) is very comparable to East Sheen albeit that it contains a lesser amount of floorspace. This indicates the strength and attraction of Barnes as a leisure destination including a range of cafes, restaurants and public houses as evidenced by the survey undertaken by RPS. No estimates of comparison and convenience goods turnover are provided indicating the very local catchment of the centre for these types of goods.

8.39 In summary, it is therefore clear that any effects arising from the application proposals in terms of the Class A1 retail components would not be felt by lower order local and neighbourhood centres. These centres are healthy and perform a different role and function to the proposed scheme of development planned for the former Stag Brewery. The following impact analysis therefore focuses upon East Sheen.

Spending Potential of the Proposed Future Residents of the Scheme

8.40 The proposed scheme includes the provision of up to 817 residential units. These have the potential to generate a population of up to 1,850 people by 2024 (based upon information set out within the submitted Environmental Statement).

8.41 It is reasonable to assume that the future residents of the scheme will spend at least a proportion of their income within the shops, restaurants and other leisure facilities which form part of the proposed scheme. Indeed, the purpose of providing these facilities is to create a new sustainable residential community. Equally some of this future residential expenditure will help to support shops within existing town centres including East Sheen.

8.42 By utilising the expenditure per head figures relating to Zone 7 (East Sheen/Barnes) referred to above (average spend per head for the area), it is possible to calculate the amount of expenditure on convenience and comparison goods and food and beverage generated by the residential population of the scheme. The table below provides a summary of available expenditure generated by the residential population of the proposed scheme at the design year (2024).

Expenditure Type	2024 Expenditure per Head £	Population	Total Expenditure £M
Comparison	£4,709	1,850	£8.71M
Convenience	£2,410	1,850	£4.46M
Food & Beverage	£1,593	1,850	£2.95M
Total	-	-	**£14.12M**

Notes: Adopted Zone 7 expenditure per person, Appendix 2, 3 & 4 Richmond Retail Study

8.43 As can be seen there is a significant expenditure associated with the population of the scheme (£14.12M in 2024). For the reasons previously advanced, this is likely to be a conservative estimate given trends indicate increased growth in retail and leisure expenditure since the publication of the Councilǿs Retail Study. Of course, not all of this expenditure will be spent in the shops and leisure facilities of the scheme. Even so, this available expenditure means that the net draw of the scheme upon expenditure and existing retail and leisure facilities will be reduced significantly. In addition, there will be expenditure associated with the working population of the scheme.

Estimated Turnover Potential of Proposed Retail and Leisure Floorspace

8.44 The proposed Class A floorspace will take the form of a variety and mix of uses including shops selling comparison and convenience goods, cafes, restaurants, coffee shops and bars.

8.45 Based upon a maximum floorspace of 4,664sqm for flexible uses, the table below provides a breakdown of the floorspace by type of use for the purposes of calculating the potential turnover of the Class A floorspace.

8.46 Given the speculative nature of the proposed retail and leisure uses, RPS has had to make a number of assumptions regarding the future composition of the floorspace, including the proportion of Class A1 to A3/A4 and the split between convenience and comparison goods. Given the location and the Vision for the site it is expected that a greater amount of the proposed Class A1 floorspace will be given over to the sale of convenience goods (60%).

Floorspace Type	Floorspace sqm		
	Gross	Sales Area	% of Total
Comparison (40% of Class A1)	1,000sqm	750sqm	23.2%
Convenience (60% of Class A1)	1,500sqm	975sqm	30%
Food & Beverage	2,164sqm	1,515sqm	46.8%
Total	4,664sqm	3,240sqm	100%

Sales Areas estimated as: comparison floorspace (75% gross), convenience (65% gross), Food and beverage (70% gross)

8.47 Based upon the above assumptions, the proposed scheme will comprise a Class A sales area of 3,240sqm which is 69% of the overall gross floorspace.

8.48 The table below calculates the potential turnover of the proposed Class A retail and leisure floorspace having regard to the average sales densities adopted by the Richmond Retail Study. The Retail Study however is conducted on the basis of sales densities which RPS considers would only be achieved by the largest centres. RPS has therefore adjusted the sales densities so that they reflect the location and types of operators that are likely to be attracted to the proposed scheme.

Expenditure Type	**Sales Density £/sqm**	**Sales area sqm**	**Turnover £M**
Comparison	£5,000	750sqm	£3.75MM
Convenience	£8,500	975sqm	£8.29M
Food & Beverage	£5,250	1,515sqm	£7.95M
Total	-	**3,240sqm**	**£19.99M**

Notes: gross to net floorspace assumed as 65% convenience, 80% comparison, 70% food & drink. Assumes maximum floorspace permissible under the terms of the proposed conditions. Sales densities have regard to the Richmond Retail Study but adjusted to reflect location and type of retail offer being outside town centres.

8.49 As can be seen, the potential turnover of the Class A floorspace (assessed on the robust basis outlined above) would be £20M in 2024. This compares to the total expenditure generated by the proposed residential population of the scheme (£14.12M). The net potential draw of the scheme on the growth in available expenditure is therefore just £5.88M i.e. 70.6% of the turnover of the proposed Class A floorspace is theoretically directly supported by the residential population of the proposed scheme.

8.50 Similarly, the predicted growth in retail expenditure over the period 2017 to 2024 is £51.38M within Zone 7. In this respect the net draw of the application proposals represents just 11.4% of the predicted growth in expenditure within Zone 7. This limited level of expenditure draw points to the appropriateness of the proposed Class A uses.

8.51 It is clear that not all of the expenditure generated by the proposed residential population of the scheme will be solely spent in the proposed retail and leisure uses. Even so, the calculations set out above point to the ‘appropriateness’ of the proposed provision. Theoretically (at best) just

30% of turnover of the proposed retail and leisure uses would need to be drawn from the wider established local residential population and local workforce. This serves to demonstrate that the proposals will meet a local need rather than create a destination retail and leisure development.

8.52 It is not possible to determine the precise level of expenditure spent at the scheme by future residents of the scheme. However it is reasonable to assume that a proportion of residentsô expenditure would be spent in this way, say 15% (£2.12M) of expenditure meaning that the balance (85%, £12M) would be spent elsewhere including in shops and leisure facilities located in nearby local centres such as East Sheen. In this way these centres (including East Sheen) will benefit in the form of increased turnover directly attributable to an increasing local population through the development of the application site. Accordingly, these centres will become more, not less, resilient to any potential effects arising from development on the application site or elsewhere. Either way, the potential draw of the scheme upon town centres would be limited and given the difference in the retail offer between East Sheen and the application proposals impacts would not be significantly adverse.

8.53 The Retail Study indicates that the growth in expenditure within the study area would support the provision of an additional 1,457sqm gross Class A1, A3 ï A5 floorspace within East Sheen by 2024. This floorspace requirement however does not factor in the supply of a significant new residential community at the application site. It also assumes that East Sheen will benefit from the growth in expenditure translating into an increased turnover. Similarly, the Study estimates there is a need for an additional 472sqm food and beverage floorspace within Barnes. Assuming the availability of suitable sites within these centres, this floorspace will support the vitality and viability of town centres. The turnover of the Class A floorspace is therefore entirely capable of being supported by the proposed residential population together with a limited draw upon the growth in available expenditure meaning that the proposals will have a negligible effect upon town centres.

8.54 Assuming the entire net turnover of the proposed retail and leisure uses £5.88M is drawn from East Sheen town centre, this would result in a potential impact of 4.1% (2024) upon the Class A turnover of the centre (convenience, comparison and food and beverage uses). In reality such an impact would be less once other goods and services which contribute to the vitality and viability of the centre are taken into account. This level of impact assumes the maximum amount of Class A1 retail floorspace is developed (2,500sqm).

8.55 In reality not all of the net turnover of the application proposals would be diverted from East Sheen, it is likely to be widely dispersed. It would also be reasonable to assume that a percentage of the turnover of the proposed food and beverage offer may be drawn from visitors to the area, the effect of which would be to reduce the level of trade diversion.

8.56 Given the riverside setting, it would not be unreasonable to assume, say 20% of the turnover of the proposed food and beverage floorspace is attributable to visitors to the area, the potential effect of which would be to reduce the net draw of the proposals upon the local area from £5.88M to just £4.28M. This would translate into an impact on East Sheen of just 3% by 2024. Even so, this has no regard to the general growth in expenditure over the assessment period which is substantial (£51.38M, 2017- 2024). This growth is likely to be conservative given trends in growth rates observed in the previous sections of this Statement. This is a very low level of impact and when regard is had to the general health of town centres and the expected growth of expenditure impacts would be very short lived and not significantly adverse.

8.57 In addition, some trade will be diverted from other retail and leisure facilities including those located within nearby centres. For example, the food and beverage offer of Barnes local centre. Even so, that offer is strong and is estimated to have a turnover in 2024 of £25M compared to the net potential maximum turnover of the proposed food and beverage offer of the application proposals £5.49M (assuming 20% inflow). Again it is clear that the proposed scale of the food and beverage offer planned for the application site would not compete with or cause significant adverse effects on Barnes town centre.

8.58 It is clear that if the turnover of the proposed scheme (£20M at 2024) is compared to the growth in expenditure (£51.38M, 2017 ï 2024) there is more than sufficient expenditure growth to support the scheme without any recourse to the diversion of trade from town centres. There would remain circa £31M expenditure to support increases in the turnover of existing centres within zone 7, the principal centre being East Sheen. The above impact analysis therefore needs to be considered within the context of this growing expenditure meaning that impacts will be overstated.

8.59 As the scheme is speculative, it is quite possible that a reduced proportion of the overall flexible use space would be put to a Class A1 and A3/A4 use, meaning that the turnover of the proposals would reduce and impacts would be overstated. Even so, having regard to the above analysis, the levels of impact predicted (based upon a worst case scenario whereby trade is solely derived from East Sheen) is not significantly adverse in the context of the health of town centres examined in the previous sections of this Statement.

Summary

8.60 The proposed Class A floorspace for the application site would not jeopardise any planned or committed comparable floorspace within East Sheen or the other nearby local town centres. There are no planned or committed developments. In contrast the application site is specifically identified as a development opportunity where there is direct policy support for a range and mix of uses including retail and leisure uses and the creation of a new heart and centre for Mortlake.

8.61 Local town centres have been assessed as healthy. They are popular with local residents and provide a range and mix of shops, leisure uses and other service uses. The proposed Class A floorspace for the application site will complement these centres.

8.62 The proposed Class A uses for the application site are of an appropriate scale and type and would not have a significant adverse effect upon local town centres. Significantly, the proposed Class A floorspace is substantially supported (70%) by the new residential population planned for the application site. This means that a maximum £5.88M expenditure would be diverted from other retail facilities. A diversion of this level solely from East Sheen town centre would result in an impact of 4%.

8.63 It is clear that an impact of 4% in 2024 upon East Sheen should not be the cause for any concern. It is not a significant adverse level of impact having regard to the overall health of the centre and its role and function. This level of impact would be cancelled out within only a matter of a few months based upon expected future rates of growth in expenditure. Similarly, impacts upon smaller local town centres would be very limited given the differences in the retail and leisure offer of the proposed development and local town centres.

Cinema Assessment

8.64 Over the past decade the commercial leisure industry has been one of the fastest growing sectors of the UK economy. This growth has been fuelled by a significant increase in leisure spending. Indeed, shopping has become more orientated towards a leisure activity where linked trips are regularly occurring. This has been driven by changes in consumer lifestyles which in turn has sustained growth in demand for a wide range of new integrated retail and leisure facilities.

8.65 In particular, there has been significant growth in the provision of new cinemas. This has been fuelled by a general increase in the number of Hollywood ôblockbustersô and new developments in cinema technology. This has resulted in the development of large modern multiple style cinemas which cater for mainstream cinema goers. In contrast there is a growing trend towards the development of smaller boutique cinemas which include a high quality food and beverage offer and other privileges. It is common place for cinemas to be developed as part of wider retail and leisure schemes including a range of restaurants where the benefits of grouped provision can be secured meaning that people visiting a cinema might be enticed to have a meal or drink pre or post a visit to the cinema and, likewise people visiting a restaurant might be attracted there because of the proximity of a high quality cinema offer. This represents the commercial reality of modern cinema operations.

8.66 According to the latest Film Distributorsô Association (FDA) Yearbook 2017 UK cinema admissions in 2016 were an average 3.25M per week (a reduction of 2.1% upon 2015 levels). Admissions are highly dependent and fluctuate by the number of high quality of blockbuster films released at any given time. In 2016, the UK had 751 cinemas containing 4,046 screens, of which 316 cinemas were multiplexes. On average cinemas are visited 2.6 times per year in the UK. London comprises 904 screens provided across 161 cinema sites. London has the highest cinema going frequency in the Country (annual average of 3.3 visits per person).

8.67 The proposed cinema will have up to 3 screens. It will provide a boutique cinema offer. The cinema will have good proximity to complementary leisure uses including restaurants and cafes which will be distributed across the scheme including within the proposed High Street Zone. These uses will help to ensure active frontages and enliven the scheme at different times of the day. The cinema will contribute to the evening economy of the scheme. The cinema is intended to occupy Block 1 of the proposed development adjacent to the main south to north vista running through the site from East Sheen to the river. The cinema entrance will be from the proposed High Street.

8.68 As the analysis provided in the previous section of this report records, there are no cinemas located within East Sheen. The nearest cinema to the application site is located within Barnes (Olympic). Elsewhere, mainstream cinema provision in the form of Odeon multiplexes is located in Putney and Richmond. The proposed cinema will be significantly different to these multiplexes.

8.69 In contrast to retail planning, there is no defined methodology for assessing cinemas. The NPPG is silent upon the assessment of cinemas. Similarly, the Richmond Retail Study whilst providing an assessment of food and drink uses does not examine the need for cinemas or indeed other commercial leisure uses.

8.70 A consensus approach is to examine participation rates using national average visitation data derived from published sources of information.

8.71 The predecessor to the NPPG, *Practice Guidance on need, impact and the sequential approach* (December 2009) which was prepared to accompany PPS4 provided some guidance on assessing cinemas (Appendix C).

8.72 Paragraph C9 of the guidance stated:

> **"To ensure that appropriate provision is made for cinema facilities, local assessments should identify the level of provision of existing facilities and determine their quality and distribution. An estimation of levels of accessibility in terms of typical drive times will give a crude estimation of the catchment population and will enable any deficiencies in existing provision to be identified. It will also provide a broad indication of how many screens an area can support."**

8.73 Furthermore, paragraph C10 continues by stating:

> **"Commercially available data and local surveys will assist in determining the level of provision. Benchmark standards of ratios of cinema screens per unit of population can be used to measure whether an existing catchment area is currently 'under' or 'over' served, and whether there is scope for new facilities arising out of any *expected population growth."***

8.74 Caution is advised in relation to such assessments (paragraph C11):

> **"However, there is a need for caution in undertaking such crude assessments as they rely to a significant extent on defining self-contained catchments, and/or estimating the effect of overlapping catchments. They often rely on comparisons with current average rates of screens per capita, which do not necessarily respond to future changes in participation and could be highly elastic. Small adjustments in visit/participation rates can also result in a considerable variation in estimated need and demand for facilities. In these circumstances there is a need to sensitivity test the methodology used, such as for example using different drive times for catchment areas accompanied by a series of decreasing visitation rates which reflect the relationship between frequency of visit and distance travelled."**

8.75 Finally paragraph C13 states:

> **"When assessing the impact of proposed new facilities (primarily in the case of site specific assessments), the extent to which proposals are likely to affect established destinations within existing centres (in terms of the draw of visitors away from commercial leisure facilities) will be a key consideration."**

8.76 Accordingly the Practice Guidance (since cancelled) advised caution in relation to the assessment of new cinemas.

8.77 In this particular case, the proposed cinema is intended to serve a localised area. Furthermore the proximity of the application site to the existing cinema at Barnes will distort the position in terms of the need for additional cinema screens. Similarly, the presence of larger multiplex cinemas at Putney and Richmond will have large catchment areas (given their accessibility by a number of different modes of public transport) which overlap with that of the cinema proposed for the application site albeit that they will be qualitatively different in terms of their offer and target audience.

8.78 It is also important to recognise that this approach to assessing cinema screen need has little regard to the size of individual cinema auditorium. One large screen could be equivalent to the provision of several smaller screens. In this case, whilst the cinema is speculative, the cinema will be of a boutique format rather than mainstream multiplex offer meaning any assessment is particularly sensitive to small variations. There are clear qualitative differences between the proposed cinema and those found in either Putney or Richmond. Such considerations will have a bearing upon potential effects. The majority of cinemas are of a multiplex format which is in contrast to the type of cinema offer to be provided as part of the proposed scheme of development for the application site.

8.79 It is important to recognise that the existence of new leisure facilities, such as a cinema, will create new markets that did not previously exist. The provision of such facilities will help generate more sustainable and local leisure activity participation. Accordingly, any survey which assesses existing patterns of cinema patronage are unlikely to reflect the potential demand for a new cinema facility within the study area.

8.80 Importantly, developing a new cinema in a catchment area of an existing cinema does not mean that any harmful effects would arise. On the contrary, proposals such as this are likely to generate new markets and attract people who would otherwise not visit the cinema or increase their visitation rather than divert trade from established cinemas.

8.81 In 2016 there was an average of 14,602 people per operational cinema screen within London. Comparing this to the population of the study area (which for the purposes of this assessment RPS has adopted Zones 6 and 7 of the Richmond Retail Study which are equivalent to an approximate 5 - 10 minute drive time from the application site) 59,214 (at 2024 ï the design year for the cinema) suggests that it is capable of supporting 4 screens where there are currently just 2 (Barnes Olympic) i.e. there is a theoretical capacity based upon average visitation per screen to support 2 additional screens compared to the proposed 3 screen cinema. As discussed above this calculation has no regard to the size of individual cinema screens provided, nor does it recognise that London enjoys the highest cinema visitation of any UK region. Having regard to the type of cinema proposed, it is reasonable to conclude that a small 3 screen boutique cinema could be supported in this part of north Richmond.

8.82 The RPS cinema assessment is consistent with the approach adopted by other planning consultants seeking to determine the ńeedô for additional cinema screens to serve a particular catchment area.

8.83 The RPS assessment provides a broad indication of the potential for the study area to support additional cinemas/screens. The application proposals have been sized to meet that need (conservatively estimated at 2 screens based upon a UK visitation average (2.7 times per annum) rather than the much higher London average (3.3 times per annum). Many of the proposed screens are small in size and furthermore in common with modern multiplex cinemas not all of the screens will be showing films at the same time.

8.84 Cinema revenue is driven in part through food and drink sales. This is not sales that would have otherwise been spent elsewhere. In this respect the sale of such goods would not have an impact upon town centre shops etc.

8.85 The British Film Institute shows that there has been a steady increase in the number of cinema admissions. Similarly UK Box office earnings have increased. This growth in recent years is a good indicator of the strength of the cinema market. To some degree, leisure spending at Cinemas has been órecession proofô(Odeon & UCI Cinemas Group Conference Paper, October 2011 & Dodona Research). This is in part due to cinema operators continuing to invest in improving the customer experience.

8.86 The average admissions cover all types of cinema from small single screen picture/art cinemas to large modern multiplexes. Admissions are generally higher for multiplexes given the choice of film content at any given time. Indeed this is recognised by the BFI in terms of there being *“a positive and statistically significant linear relationship between cinema admissions per person and screen density”,* i.e. the higher the number of screens per person, the higher the admissions level. Even so, more cinema visitors are seeking a boutique type visitor experience.

8.87 The Independent Cinema Office (ICO) provides commentary and guidance on establishing catchment areas and confirms that the most common way of defining a cinemaøs catchment is to consider drive times (as a function of accessibility). This may be so but in dense urban areas such as London where there is excellent accessibility to public transport this is not necessarily the best way of ascertaining the catchment. Nevertheless, the ICO states that the catchment in any individual case is likely to be influenced by a number of factors including:

- The scale of the proposal
- The scale and number of existing cinemas in the area
- The quality and range of other leisure facilities near the planned cinema (in light of visits to cinemas usually being accompanied by other leisure activities e.g. shopping, eating and drinking)
- The extent of car ownership within the proposed catchment and the attitude to travel for leisure purposes
- The quality and frequency of public transport
- The age profile of the surrounding area and
- The surrounding geography, including proximity to major transport networks and significant populations centres.

8.88 This approach has generally been followed in planning for a new cinema at Mortlake. Put simply a cinema would not be proposed for the application site if there was considered to be no need for it. This is partly why the government dropped the óneedôtest as a standalone test for assessing proposals for main town centre uses. Operators are best placed to know if a particular location/format will work. The Applicant has been in discussions with a range of operators. Those discussions have informed the application proposals in terms of including a 3 screen cinema together with a range of restaurants and related uses.

8.89 The catchments of the mainstream cinemas at Putney and Richmond will overlap with that of the proposed cinema given that they are highly accessible by modes of public transport. Similarly the proposed cinema will have a comparable catchment to the existing cinema in Barnes. There is however no reason why cinemas cannot exist in close proximity. Indeed, there are numerous examples where cinemas run by different operators co-exist (e.g. Richmond town centre). This is on the grounds that there are a large number of films on offer at any one time and also the ability for cinemas to offer different screening times for major films at peak viewing periods. In this way cinemas can successfully trade alongside each other where they provide a comparable offer. In this respect the application proposals will provide a comparable offer to the Olympic at Barnes. The proposed cinema would not have any trading consequences for the existing cinema. Barnes is a strong local centre with a range of leisure uses present. It has a high local patronage and the application proposals are not expected to have any effect upon the health of the centre.

8.90 As previously discussed, the leisure component of the scheme (cinema and restaurant uses) will create its own market rather than draw people away from visiting comparable facilities located in other town centres such as Barnes or East Sheen.

8.91 According to Experian, expenditure at cinema's (admission fees) is £39 per person within the East Sheen/Mortlake/Barnes area. This compares to a UK average of just £19 per person. The study area therefore is likely to support 3-4 visits to the cinema per year based upon average ticket prices. However it is important to recognise that cinema's also rely upon revenues generated from the sale of food and drink as part of the overall visitor experience.

8.92 Nevertheless, comparing cinema operators, the mainstream cinema offer of Richmond and Putney are strong. Similarly, the Barnes cinema offer whilst being qualitatively different to that found in Putney and Richmond is also a strong offer. The application proposals are for a similar type of cinema offer to that found in Barnes in terms of the number of screens provided and the quality of the experience. The proposed cinema will help to meet a growing need for additional screens in the area in accordance with the London trend for increased visitation and regard to the number of screens per population.

8.93 Similarly in terms of the restaurant offer, the restaurants will be operated by a range of operators. The proposed restaurants will compete on a like for like basis, for example, they would not have a negative impact upon existing independent cafes, restaurants and takeaways found in East Sheen or Barnes (or other centres).

8.94 The cinema assessment set out above demonstrates that there is a requirement for at least 2 additional screens within North Richmond including the Kew, Mortlake, East Sheen and Barnes areas. This has little regard to the fact that London has the highest expenditure on cinema visitation of any UK region (3.3 visits per person). Even so, the assessment demonstrates that the provision of at least 2 screens can be accommodated in quantitative terms. This of course has little regard to the size of auditorium per cinema screen. The provision of a cinema as part of the application proposals will not have a significant adverse effect upon existing local cinemas or indeed town centres.

Conclusion

8.95 In summary, the proposed retail and leisure uses will have a positive beneficial effect. They will complement existing provision found within the local area including at East Sheen and Barnes. The primary purpose of providing a range and mix of retail and leisure uses is to support the new residential population of the scheme. As the above analysis demonstrates, the proposed retail and leisure uses will not have a significant adverse effect upon town centres.

8.96 In the main, the proposals will be directly supported by a combination of the growth in available expenditure and the new residential and working population of the scheme. The quantum and type of retail and leisure facilities proposed are entirely appropriate and in scale with the overall scheme and policy allocation of the site.

9 CONCLUSIONS

9.1 In summary, the following conclusions can be reached in respect of the assessment of the application proposals against national and local retail and leisure planning policy:

- The proposals will provide a high quality sustainable mixed use development whereby the day to day needs of the new residential community are supported by a range of appropriate local retail and leisure facilities.

- The application site occupies an edge of centre location that is accessible by public transport. The site is specifically identified as a development opportunity within the Local Plan for a mix and range of uses including retail, leisure and employment generating uses. Planning policies promote the creation of a new centre and heart for Mortlake.

- The proposed retail and leisure uses accord with the siteǯs allocation in an up to date Local Plan. Consequently, they are not required to be considered against the sequential test. Even so, the assessment of nearby centres demonstrates that there are no suitable and available sites and premises to accommodate the proposed retail and leisure uses even in a flexible form.

- The key policy test that the proposed retail and leisure uses need to satisfy is the impact test. The proposed retail and leisure uses will fulfil a local role by meeting the day to day needs of future residents of the scheme. They will complement rather than compete with East Sheen district centre. Local town centres are healthy. The proposed retail and leisure offer of the scheme will be quantitatively and qualitative different to that of nearby town centres consequently there will be no significant adverse effects.

- A substantial proportion of the turnover of the proposed Class A floorspace is directly supported by expenditure generated by the new residential population of the scheme. If the balance of the schemeǯs turnover were to be solely diverted from East Sheen, the impact of the proposals upon that centre would a worst be 4%. It is very clear having regard to the health check analysis that this level of impact would not have a significant adverse effect upon its vitality and viability. Accordingly, the retail and leisure elements of the application proposals must be considered ǮappropriateǯǤ In reality the scheme would be supported by some of the substantial predicted growth in expenditure, the effect of which would be to reduce the trade draw of the scheme upon town centres and produce a corresponding reduction in the level of impact.

- Impacts are likely to be overstated given the robust approach taken in relation to assessing the potential turnover of the proposed Class A floorspace. Furthermore, no account is taken of the requirement for additional Class A floorspace within East Sheen (as supported by the Richmond Retail Study) over the plan period. The provision of such floorspace would further reduce any impact given that it would increase the attraction and turnover of the town centre.

- The levels of impact predicted (at worst) would be readily absorbed with a matter of a few months having regard to the predicted future growth in retail and leisure expenditure which is expected to grow in excess of the rates adopted by the Councilôs retail evidence base.

- The proposed cinema will contribute to the vibrant mix of uses proposed for the application site. It will help to enhance the evening economy together with the proposed range of restaurants and bars. The cinema will be comparable to and complement the only existing cinema within the local area situated in Barnes. The Barnes cinema has a loyal customer base and significantly benefits in terms of its setting on a popular high street where there is an established and high quality food and beverage offer. The proposed cinema would pose no threat to the viability of the Barnes cinema.

9.2 For the above reasons, there should be no reason to resist the grant of planning permission for proposed retail and leisure uses having regarding to relevant national, regional and local planning policies.

9.3 The application proposals accord with the policy allocation of the site and would not have any significant adverse effects upon town centres.

APPENDIX 1: TOWN CENTRE AUDITS

Centre name:	East Sheen
Position in Hierarchy:	District Centre
Local Authority:	Richmond
Type of weather at time of visit:	Cloudy and windy
Date and Time of visit:	20 July 2017 12.30

Assessment Category	**Commentary**
Overall busyness of centre	Not very busy. Heavy through traffic but few pedestrians.
Primary Shopping Frontage streets	Upper Richmond Road West. Main location of high street multiple national retailers including WH Smith, Superdrug, Waitrose.
Secondary Shopping Frontage streets	Sheen Lane. Contains more independent shops and service uses.
Amount of convenience floorspace (sqm gross)	4030 m^2 (excludes Sheen Lane) (Council retail evidence)
Amount of comparison floorspace (sqm gross)	18,650 m^2 (Council retail Evidence)
Vacant units (number, size, location, proximity to other vacant units, previous use, signs of imminent re-use)	Vacant units are limited and scattered across the centre. There is no pattern of vacant units. Vacant units appear to be quickly re-occupied.
Vacant/derelict sites/location and size	No vacant/derelict sites apparent
Key Retail Attractors	Waitrose, Superdrug, Robert Dyas, WH Smith and range of high quality independent stores
Main Foodstores	Waitrose, Tesco Express

Any 'Edge of Centre' retail provision	None
Any Purpose built shopping centres	None
Pedestrian footfall - high/low areas	Higher footfall in primary shopping frontage.
Any Department/variety stores	None
Quality/ranges of Independent shops	High-end boutique stores and coffee shops. But also mixed with low quality independent takeaways etc.
Propensity of charity shops	There are a range of charity shops dispersed throughout the centre
Range of non-retail (non Class A) uses in centre	Banks, offices and some residential
Availability of open space/landscaping	Area of green space south of Mortlake station.
Overall quality of town centre (perception)	Town centre dominated by busy road. Apart from this there are efforts to make a high quality landscape. There are wide pavements with trees either side.
Quality/maintenance of buildings	Well maintained. Primary frontages more attractive and maintained than secondary shopping frontages where some buildings are in need of investment.
Quality of street furniture and paving	Pavement is uneven in places. Street furniture limited and confined to a single location. There are a number of pedestrian crossings in the centre which aid pedestrian movement.
Signs of current or future investment (inc. planning proposals)	No signs of any current or planned investment
Are there any markets (location, operating hours, type/range of goods, indoor/on street)	-
Accessibility by public transport and convenience (bus, rail, frequency, proximity of stops to centre etc)	Frequent bus services operate along Upper Richmond Road West including: route 33 (to Hammersmith every 8 mins), 337 (To Richmond every 10 mins), 493 (to Tooting every 12 mins), 969. Countdown signs installed at bus stops. Well connected with Mortlake Train station railway station
Range of facilities (e.g. toilets etc)	There are no public toilets. Range of town centre information/notice boards.
Quality, pricing, convenience and range of car parking	Limited parking to the street (Red Route). Waitrose car park (free parking for 1.5 hours) and Pig + Whistle car park (£1.20

	per hour but small).
Provision of restaurants, bars, nightclubs	Significant number of restaurant including multiples and independent operators, public houses, coffee shops
Cinema provision	None
Does the town centre feel safe	Centre feels safe. No obvious signs of graffiti or vandalism. Road safety a concern with busy road but a number of crossings provided.
Other comments/observations	The centre has a healthy mix of shops and service uses and few vacant units. There is a range of high street multiples present and the centre is anchored by Waitrose. The centre has a high quality independent retailer offer with a particular focus upon homewares, decorating and home furnishings. There are a range of leisure uses which ensure activity at different times of the day within the centre.

Centre name:	Barnes
Position in Hierarchy:	District Centre
Local Authority:	Richmond
Type of weather at time of visit:	Cloudy with slight drizzle
Date and Time of visit:	20 July 2017 10.30am

Assessment Category	**Commentary**
Overall busyness of centre	Not busy. Very few people shopping and limited people in cafes.
Primary Shopping Frontage streets	Barnes High Street.
Secondary Shopping Frontage streets	Church Road
Amount of convenience floorspace (sqm gross)	6060 m^2 (Council retail evidence)

Amount of comparison floorspace (sqm gross)	1550 m^2 (Council retail evidence)
Vacant units (number, size, location, proximity to other vacant units, previous use, signs of imminent re-use)	Limited number of vacant units and these are dispersed throughout the centre.
Vacant/derelict sites/location and size	None apparent
Key Retail Attractors	Sainsbury's and Marks and Spencer's Foodhall. Marks and Spencer's is a new addition to centre.
Main Foodstores	Sainsbury's, Marks and Spencer's Foodhall and small Londis
Any 'Edge of Centre' retail provision	None
Any Purpose built shopping centres	None
Pedestrian footfall - high/low areas	Primary shopping frontage has greatest concentration of footfall
Any Department/variety stores	None
Quality/ranges of Independent shops	High end cafes, jewellers and interior design
Propensity of charity shops	Low number of charity shop dispersed within the centre.
Range of non-retail (non Class A) uses in centre	Significant proportion of non-retail uses in the centre, dominated by residential dwellings. Some new residential flats developed on main primary shopping frontage.
Key non-retail (non Class A) uses in the centre	Residential, MOT centre and offices above shops.
Availability of open space/landscaping	Large park in centre
Overall quality of town centre (perception)	High end high street. Lots of street furniture and bike racks. Barnes Green adjoins High Street and close proximity to river adds to the attraction of the town centre
Quality/maintenance of buildings	Good quality and all buildings are well maintained
Quality of street furniture and paving	Pavement well maintained but limited street furniture. No seating in primary shopping frontage. Hanging flower baskets and bus shelters. Local information signage.
Signs of current or future investment (inc. planning proposals)	Recent investment by Marks & Spencer.
Are there any markets (location, operating hours, type/range of goods, indoor/on street)	None

Accessibility by public transport and convenience (bus, rail, frequency, proximity of stops to centre etc)	Bus routes include 33 and 209 to Hammersmith, 72 to Roehampton, 419 to Hammersmith, 485 to Wandsworth and N22. Barnes Bridge and Barnes railway station- 4 trains per hour to London Waterloo.
Range of facilities (e.g. toilets etc)	No public toilets. Local accessible green space.
Quality, pricing, convenience and range of car parking	On street parking only and limited. Maximum 2 hours stay, £1.20 an hour and £2.35 for 2 hours
Provision of restaurants, bars, nightclubs	Range of restaurants and 2 public houses. Restaurants are a mix of independent and a few multiples.
Cinema provision	Olympic studios with 2 screens.
Does the town centre feel safe	Pleasant attract and safe town centre. No signs of graffiti or vandalism. Range of cafe and active evening economy ensure nature surveillance throughout the day. Effective street lighting and 1 CCTV camera
Other comments/observations	The centre has an active cafe/restaurant culture. The centre is attractive and has a range of shops and services aimed primarily at local residents in terms of meeting their day to day needs. The cinema provides an important attraction in terms of the contribution that it makes to the evening economy. The town centre is healthy and well maintained throughout.

Centre name:	Kew Gardens Station
Position in Hierarchy:	Local Centre
Local Authority:	Richmond
Type of weather at time of visit:	Cloudy
Date and Time of visit:	20 July 2017 4.30pm

Assessment Category	**Commentary**
Overall busyness of centre	The centre is busy given that it is centred upon the underground station. There is significant commuter traffic and

	visitors travelling to Kew Gardens. Cafes were particularly busy at the time of the survey.
Primary Shopping Frontage streets	The primary shopping area is focused upon Station Approach and Station parade.
Secondary Shopping Frontage streets	None
Amount of convenience floorspace (sqm gross)	952 sqm^2 (Council retail evidence)
Amount of comparison floorspace (sqm gross)	412 sqm^2 (Council retail evidence)
Vacant units (number, size, location, proximity to other vacant units, previous use, signs of imminent re-use)	No vacant units.
Vacant/derelict sites/location and size	None
Key Retail Attractors	Tesco Express, Lloyds Pharmacy and various coffee shops and a public house
Main Foodstores	Tesco Express and independent store (Oliver's Whole food store)
Any 'Edge of Centre' retail provision	None
Any Purpose built shopping centres	None
Pedestrian footfall - high/low areas	High footfall around the station,
Any Department/variety stores	None
Quality/ranges of Independent shops	High quality retail offer supporting a cafes culture, furniture stores and florists.
Propensity of charity shops	Only one charity shop.
Range of non-retail (non Class A) uses in centre	Residential dwellings, offices
Availability of open space/landscaping	No green open space within the centre, but the centre has a range of seating areas and mature trees line the street.
Overall quality of town centre (perception)	High quality town centre. There are wide roads with traffic calming, wide pavements and a number of bars and restaurants with outdoor seating area. Traffic is limited within the centre.

Quality/maintenance of buildings	High quality buildings. All well maintained
Quality of street furniture and paving	High quality. Lots of street furniture and wide pavements. A number of cycle racks provided.
Signs of current or future investment (inc. planning proposals)	None
Are there any markets (location, operating hours, type/range of goods, indoor/on street)	Kew Village Market with 38 stalls running first Sunday of every Month.
Accessibility by public transport and convenience (bus, rail, frequency, proximity of stops to centre etc)	Kew Gardens Train station has 2 platforms. The district line runs to Richmond and Upminster and there are 6 trains per hour. It also runs on the North London Line with 3 trains per hour. There are also a number of buses running along Sandycombe Road.
Range of facilities (e.g. toilets etc)	Toilets available in Kew Gardens Station.
Quality, pricing, convenience and range of car parking	Very limited parking on street parking with most being for permit holders only. Small pay and display car park outside station which was £1.20 for hour and £2.35 for 2 hours. Cheaper if you have a Richmond Card
Provision of restaurants, bars, nightclubs	A few restaurants including Pizza Express and a number of independent restaurants. One pub next to station.
Cinema provision	None
Does the town centre feel safe	Very safe in terms of road safety and anti social activity. No signs of vandalism or graffiti. Station has CCTV
Other comments/observations	Kew Gardens Station is a local centre serving the local needs of the immediate residential area, commuters and visitors to Kew Gardens. It is an attractive centre with a good, if small, range of shops, cafes and restaurant and service uses. The centre is healthy and significant benefits from the presence of the railway station.

Centre name:	White Hart Lane
Position in Hierarchy:	Neighbourhood Centre
Local Authority:	Richmond

Type of weather at time of visit:	Cloudy
Date and Time of visit:	20 July 2017 3pm

Assessment Category	Commentary
Overall busyness of centre	Very quiet even with schools finishing
Primary Shopping Frontage streets	The centre is dispersed along White Hart Lane
Secondary Shopping Frontage streets	None
Amount of convenience floorspace (sqm gross)	810sqm^2 (Council retail evidence)
Amount of comparison floorspace (sqm gross)	922sqm^2 (Council retail evidence)
Vacant units (number, size, location, proximity to other vacant units, previous use, signs of imminent re-use)	Only 3 vacant units, vacant units look short-term.
Vacant/derelict sites/location and size	None
Key Retail Attractors	Sainsbury's Local
Main Foodstores	Sainsbury's Local
Any 'Edge of Centre' retail provision	None
Any Purpose built shopping centres	None
Pedestrian footfall - high/low areas	Low footfall. Higher Footfall at the top of White Hart Lane where there is a small roundabout (near to Sainsbury's)
Any Department/variety stores	None
Quality/ranges of Independent shops	Range of different independent shops – lack of high street multiples
Propensity of charity shops	None
Range of non-retail (non Class A) uses in centre	Residential dwellings and limited number of offices

Key non-retail (non Class A) uses in the centre	Residential dwellings
Availability of open space/landscaping	No open space
Overall quality of town centre (perception)	White Hart Lane is tree lined which provides a pleasant street. Dispersed nature of the centre.
Quality/maintenance of buildings	Well maintained buildings
Quality of street furniture and paving	Limited street furniture including cycle parking. Well maintained pavements
Signs of current or future investment (inc. planning proposals)	None
Are there any markets (location, operating hours, type/range of goods, indoor/on street)	None
Accessibility by public transport and convenience (bus, rail, frequency, proximity of stops to centre etc)	A number of buses run through White Hart Lane including 209, 419, 609, 969 and N22. Close to Barnes Bridge Rail Station (4 trains per hour to Waterloo) and Mortlake Station (8 trains per house to Waterloo)
Range of facilities (e.g. toilets etc)	No shopper/visitor facilities.
Quality, pricing, convenience and range of car parking	Limited parking on White Hart Lane. 80 visitor parking space in Barnes Hospital (2 mins away). 13 spaces at Mortlake Station £2 for 2 hours (10 mins away)
Provision of restaurants, bars, nightclubs	Limited number of restaurants and public houses.
Cinema provision	None
Does the town centre feel safe	Yes, quiet streets and limited amount of people. No CCTV cameras evident. No signs of graffiti or vandalism.
Other comments/observations	Centre has a limited retail offer. Shops are confined to those serving daily convenient needs of local residents and passing traffic. The dispersed nature of the centre means that it has a lack of a focus but the Sainsbury's Local is the main attractor.

APPENDIX 2: EAST SHEEN & BARNES CHANGES

Changes to GOAD plan East Sheen

	GOAD Plan October 2015			RPS Survey July 2017		
Address	Name	Activity	Use	Name	Activity	Use
505-507 Upper Richmond Road West		Vacant		The Bear Kick	Restaurant	A3
370 Upper Richmond Road West	Alexander Gatto	Natural Therapy	A1		Tailor shop	A1
366 Upper Richmond Road West		Vacant		Dental Experience	Shop	A1
362 Upper Richmond Road West		Vacant		Capital	Electrical Wholesales	A1
356 Upper Richmond Road West		Vacant		Swan	Dry Cleaning	A1
467-469 Upper Richmond Road West	Red Chilli	Indian Restaurant	A3		Vacant	
344 Upper Richmond Road West	Sura	Off License	A1	Farrow & Ball	Decoration Merchants	A1
338 Upper Richmond Road West		Vacant			Dwelling	C3
7 Grand Parade		Vacant		Fruit & Veg	Convenience store	A1
310 Upper Richmond Road West		Vacant			Personal training station	A1
308 Upper Richmond Road West	Parkside	Art Gallery	A1		Vacant	
417 Upper Richmond Road West	Pack Send	Business Services	A2		Vacant	
405 Upper Richmond Road West	The Olive Tree	Coffee shop	A3	Gails Bakery	Café	A3
268 Upper Richmond Road West	Cargo Homeshop	Household goods	A1	Benson Beds	Furniture store	A1
377 Upper Richmond Road West		Vacant		King of Cotton	Bed furniture	A1
369 Upper		Vacant		Yellow Print	Print shop	A1

Richmond Road West				shop		
1 Sheen Lane	Robinson Residential	Estate agent	A2		Vacant	
139 Parkway House		Vacant		Witison	Café	A3
343 Upper Richmond Road West	Infant	Children's wear	A1	Bella del Gelato	Ice cream shop	A3
218 Upper Richmond Road West		Vacant		Park Gate	Estate agent	A2
321 Upper Richmond Road West	Sheen living	Interior decorations	A1	Coffee & Co	Café	A3
196 Upper Richmond Road West		Vacant		James Yeo	Kitchen Furniture	A1
186 Upper Richmond Road West	Kleo nails & sun room	Beauty salon	A1	Greenwood & Sons	Funeral Directors	A2
269 Upper Richmond Road West		Vacant (variety box)			Hearing centre	A1
245 Upper Richmond Road West	The Sheen	Art gallery	A1		Vacant	
213 Upper Richmond Road West		Vacant		Barkside	Dog shop	A1
119 Sheen Lane	Missing Foundation	Charity shop	A1		Vacant	

Changes in uses

Use	Before	After
A1	9	13
A2	2	2
A3	2	5
C3		1
Vacant	14	6

Changes to GOAD plan Barnes

	GOAD Plan October 2015			RPS July 2017		
Address	Name	Activity	Use	Name	Activity	Use
36 A Barnes High street		Office	A2		Vacant	
39 Barnes High Street		Vacant			Jazz Room	A3
29 Barnes High Street		Office	A2		Dwelling	C3
28 High Street (not on Goad)					M+S Foodhall	A1
24 Barnes High Street	T. Andre	Hairdressers	A1		Vacant	
19 Barnes High Street	Sofin	Interior Design	A1		Vacant	
55 Barnes High Street		Vacant		Barnes Village Barbers	Hairdressers	A1
60-61 Barnes High Street		Vacant		Pets Corner	Pet shop	A1
67 Barnes High Street	Hamptons International	Estate agent	A2		Vacant	
15 Church Road	Barclays	Bank	A2		Vacant	
51 Church Road	Phase Eight	Ladies wear	A1	Shelter	Charity shop	A1
77 Church Road	Skytravel	Travel agent	A1	The lost corner	Furniture store	A1
No address on goad - church road	The courtyard café	Café	A3	Karavan	Interior design	A1
82 Church Road	Barnard Marcus	Estate agent	A2		Vacant	
88 Church Road	Monzil Tandoori	Indian Restaurant	A3		Vacant	
135 Lowthers Parade	Boileaus	Estate agent	A2	Carter Jonas	Estate Agent	A2
2-3 Rocks Lane	Indian Zilla	Restaurant	A3	Alma	Café	A3
145A Lowthers Parade	JCW Design	Interior decorations	A1	Castelnau Tiles	Interior Decorations	A1
175 Lowthers Parade	Castelnau Tiles	Interior decorations	A1		Vacant	

Changes in uses

Use	Before	After
A1	6	7
A2	6	1
A3	3	2
C3		1
Vacant	4	8

APPENDIX 3: TOWN CENTRE SURVEY OF USES

Centre: East Sheen Date: 20 July 2017

Comparison Retail	1	16 sqm²
Convenience retail	2	355 sqm²
A1 services	20	843 sqm²
A2 services	2	84 sqm²
A3 restaurants and cafes	5	412 sqm²
A4 pubs/bars	0	
A5 Takeaways	3	104 sqm²
Vacant		
TOTAL (-vacant)	35	1842 sqm²

Address	**Retail type**	**Name**	**Size**	**Class**	**Goods sold**
31 Sheen Lane	Café	Pickle and Rye	11 x 7 (77)	A3	American restaurant, burgers etc
33 Sheen Lane	Facilities management (A2 offices)	AMFM	7 x 7 (49)	A2	
12 Sheen Lane	Models and F1 merchandise	Classic Chrome	6x5 (30)	A1	Car models, F1 clothing
35 Sheen Lane	Dry cleaners	Super clean	7x3 (21)	A1	
37 Sheen Lane	Charity shop	Youth Education Sport	5x8 (40)	A1	Sports clothing, equipment
39 Sheen Lane	Food	Tesco Express	13 x 25 (325)	Convenience retail	
14 Sheen Lane	DIY + Trade store	Alsford	13 x 15 (195)	A1	
43 Sheen Lane	Off license	Sheen Lane liquid mart	5 x 6 (30)	Convenience retail	
45 Sheen Lane	Café	Euro café	5 x 7 (35)	A3	
47 Sheen Lane	Hairdressers	Bunkers	5 x 7 (35)	A1	
49 Sheen Lane	Hairdressers	Claudio	5 x 7 (35)	A1	
51 Sheen Lane	Bakery	Cavan	5 x 6 (30)	A1	Pastries, cakes
16-26 Sheen Lane	Petrol Station	Esso			
53 Sheen Lane	A2 accountant	Bright Sterling	5 x 7 (35)	A2	
55 Sheen Lane	Hardware store	The shed	5 x 20 (100)	A1	Paint, locks, equipment
28 Sheen Lane	Sportswear	Serious stuff	8 x 5 (40)	A1	Sports kit
28A Sheen Lane	Food Fish & Chips	Sheen Fish bar	5 x 8 (40)	A5	

28B Sheen Lane	Acapuncture + Herbal Medicine	Total Wellbeing	5 x 3 (15)	A1	
30 Sheen Lane	Café	Coffee and cake co	5 x 8 (40)	A3	Cake, pastries, coffee
32 Sheen Lane	Takeaway	Sheen Cuisine	5 x 8 (40)	A5	
61 Sheen Lane	Phone shop + computer repair	PC and phoneshop	3 x 4 (12)	A1	PC and phone equipment
63 Sheen Lane	Antique store	Antique store	4 x 4 (16)	Comparison retail	
65 Sheen Lane	Caterers	And Feast	3 x 4 (12)	A1	Catering for canapes
67a Sheen Lane	Tailoring	Jouseps	3 x 4 (12)	A1	
34A Sheen Lane	Nails and beauty	Coco	5 x 12 (60)	A1	
36 Sheen Lane	Window fitting	Sheen Windows	5 x 12 (60)	A1	
38 Sheen Lane	Café	Robins café	5 x 12 (60)	A3	Cake, pastries
69A Sheen Lane	Hairdressers	Joe Alban	3 x 4 (12)	A1	
69A Sheen Lane	Indian Takeaway	Lazeez Deli	3 x 4 (12)	A5	
40 Sheen Lane	Bar/restaurant	Canham	10 x 12 (120)	A3	
71 Sheen Lane	Hairdressers + beauty	Emily Victoria	7 x 6 (42)	A1	
73 Sheen Lane	Takeaway	Secret Recipe	4 x 3 (12)	A5	
75 Sheen Lane	Interior design	Holloways of Ludlow	5 x 8 (40)	A1	
77 Sheen Lane	Interior design	Parkwood	6 x 4 (24)	A1	
44 Sheen Lane	Persian restaurant	Malana	10 x 8 (80)	A3	
46 Sheen Lane	Interior design	GJR Interior	8 x 4 (28)	A1	
46 Sheen Lane (upstairs)	Dentists	Richmond Dental Centre	8 x 4 (28)	D1	
48 Sheen Lane	Fitness Centre	Fitness centre for women	12 x 100 (120)	D2	
50 Sheen Lane	Yoga	Yoga hub	10 x 10 (100)	D2	

Centre: **Kew Gardens** Date: **20 July 2017**

Class	Number	Size
Comparison Retail	6	412 sqm²
Convenience retail	8	952 sqm²
A1 Shops	22	1179 sqm²
A2 Financial and professional services	11	1480 sqm² (720 art studio)
A3 restaurants and cafes	14	1156 sqm²
A4 pubs/bars	1	216 sqm²
A5 Takeaways	2	89 sqm²
Extra e.g D1	2	-
Vacant	0	
Total	66	5484 sqm²

Address	**Retail type**	**Name**	**Size**	**Class**	**Goods sold**
Royal Parade, 1 Station Approach	Estate agents	Featherstone Leigh	10x12 (120)	A2	
Royal Parade, 2 Station Approach	Wine Shop	The good wine shop	6x16 (96)	A1	Ranging bottles of wine
Royal Parade, 3 Station Approach	Café	Caffe Torelli	6x20 (120)	A3	Cakes, pastries
Royal Parade, 4 Station Approach	Newsagent	Sonya	6x10 (60)	Convenience retail	Basic goods
Royal Parade, 5 Station Approach	Dry cleaning	American dry cleaning company	6x8 (48)	A1	
Royal Parade, 6 Station Approach	Estate agent	Hallets	6x12 (72)	A2	
Royal Parade, 7 Station Approach	Dental care	Gardens dental care	5x8 (40)	D1	
Royal Parade, 8 Station Approach	Hairdressers	Westbrook	5x14 (70)	A1	
Royal Parade, 9 Station Approach	Charity shop	Mary's Living and Giving Shop	6x16 (96)	A1	Womens clothing
10 Station Approach	Restaurant	Pizza Express	6x16 (96)	A3	

9 Station Approach	Restaurant	Antipodea	6x16 (96)	A3	
7 Station Approach	Restaurant	Ma cuisine	6x16 (96)	A3	
7 Station Approach	Opticians	Eye Kew	6x10 (60)	A1	
6 Station Approach	Barbers	Als Clip Join	4x7 (28)	A1	
6 Station Approach	Flower store	PM Flowers	2x5 (10)	A1	
5 Station Approach	Foodstore	Olivers Whole Food store	12x16 (192)	Convenience retail	High-end basic goods
4 Station Approach	Beauty store	Blushions	6x5 (30)	A1	Salon, hair products
3 Station Approach	Shoe store	Canopy	5x10 (50)	A1	Footwear + accessories
1-2 Station Approach	Book shop	Kew Bookshop	10x6 (60)	A1	Books, toys, gifts
Kew Garden Station, Station Approach	Pub	Tap on the Line	12x18 (216)	A4	
18 Station Parade	Flower shop	Kew Gardener	6x8 (48)	A1	
16 Station Parade	Butchers	Pether	6x5 (30)	A1	
14 Station Parade	Restaurant	The Glasshouse	10x19 (190)	A3	
12Station Parade	Kids store	Shoe Station	5x22 (110)	A1	Kids shoes
10 Station Parade	Newsagent	Martin McColls	5x12 (60)	A1	Basic goods
4-8 Station Parade	Supermarket	Tesco Express	8x14 (112)	Convenience retail	
2 Station Parade	Estate agent	Anthony Roberts	10x8 (80)	A2	
1 Station Parade	Café	Kew Greenhouse	10x8 (80)	A3	
3 Station Parade	Pharmacy	Q Pharmacy	5x10 (50)	A1	
5 Station Parade	Wine shop	Oddbins	8x10 (80)	A1	Wine and other alcohol
7 Station Parade	Café	Starbucks	6x16 (96)	A3	
9 Station Parade	Women's store	Mia Wood	6x12 (60)	A1	Jewellery, handbags, gifts
13 Station Parade	Bank	Barclays	14x8 (112)	A2	
19-21 Station Parade	Pharmacy	Lloyds Pharmacy	5 x 3 x 6 (90)	A1	
308 Sandycombe Road	Estate agent	Anthony Roberts	6x12 (72)	A2	
306 Sandycombe Road	Estate agent	Chestertons	8x16 (128)	A2	
304 Sandycombe Road	Food shop	Aroma	24 x 16 (384)	A1	
298 Sandycombe	Furniture	Not Known	6x8 (48)	A1	

Road					
Sandycombe Road	Laundrette	Laundrette	7x8 (56)	A1	
114 North Road	Kebab House	Kew Fish Bar	5x5 (25)	A5	
North Road	Café	Pagoda	6x8 (48)	A3	
North Road	Newsagent	Kew Gardens newsagent	6x5 (30)	A1	
North Road	Off license	Kew Convenience store	6x5 (30)	A1	
108 North Road	Restaurant	Kew Gardens Oriental	6 x 10 (60)	A3	
107 North Road	Dry Cleaners	Lime dry cleaners	5x4 (20)	A1	
North Road	Library	Kew library	5x5 (25)		
105 North Road	Dental care		5 x 6 (30)	D1	
103-104 North Road	Hairdressers	Robert Alexander	8x6 (48)	A1	
102 North Road	Cafe	Autrobus and Butler	4 x 6 (24)	A3	
97-101 North Road	Car dealer	Kew Saburu	6 x 12 (72)	A2	
North Road	Car dealer	Chris and Chris Motors	5 x12 (60)	A2	
115 North Road	Taxi service	Bloomfield Executive Cars	2 x 4 (8)	A2	
277 Sandycombe Road	Lebanese Restaurant	Polymyra	6x10 (60)	A3	
279 Sandycombe Road	Nepal Restaurant	Rara	6x10 (60)	A3	
281 Sandycombe Road	Oliver Topham	Antiques	6x8 (48)	A1	
283 Sandycombe Road	Rain wear	Weather Vain	6x8 (48)	A1	
285 Sandycombe Road	Fish and Chip takeaway	Garden Fish Bar	8x8 (64)	A5	
287 Sandycombe Road	Flower Shop	Zita Elze	6x8 (48)	A1	
289 Sandycombe Road	Restaurant	Curry Garden	7x10 (70)	A3	
291 Sandycombe Road	Italian Restaurant	Q Vende	6x10 (60)	A3	
293 Sandycombe Road	Quilting	Tikki	6x10 (60)	A1	
295 Sandycombe Road	Hairdressers	Q cut	6x10 (60)	A1	
297 Sandycombe Road	Cat vet	Kitten to cat	6x11 (66)	A2	
299 Sandycombe Road	Newsagent	Squire's	7x12 (84)	A1	
301 Sandycombe Road	Computer Repair	Computer Repair?	6x6 (36)	A1	
303 Sandycombe Road	Flowers	Design Academy	6x8 (48)	A1	
	Art Studio	Kew Art Studio	30 x 24	A2	

			(720)	

Centre: White Hart Lane **Date: 20 July 2017**

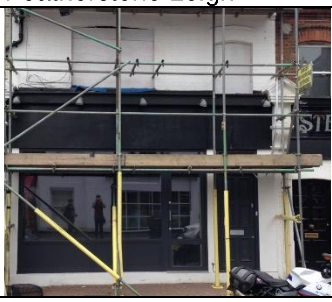
Comparison Retail	11	922sqm²
Convenience retail	5	810sqm²
A1 services	12	689sqm²
A2 services	3	214sqm²
A3 restaurants and cafes	7	379sqm²
A4 pubs/bars	1	300sqm²
A5 Takeaways	1	35sqm²
Vacant	3 (7% vacancy rate)	
TOTAL	43	3349sqm²

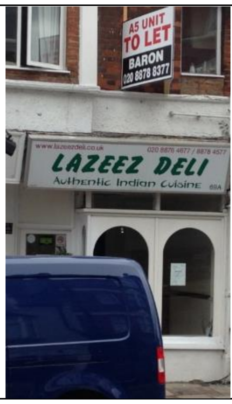
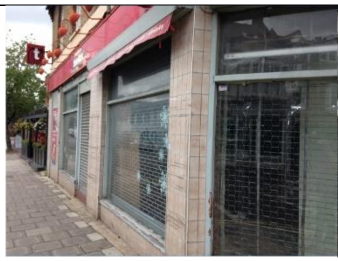
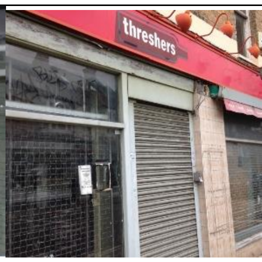
Address	**Retail type**	**Name**	**Size**	**Class**	**Goods sold**
1 The Broadway	Café	The Corner Cafe	6x8	A3	Coffee, sandwiches, lunch
2 The Broadway	Newsagent	Riva	5x20	Convenience retail	Soft drinks, basic goods
3 The Broadway	Café	Dolce Crema	8x12	A3	Coffee, cakes, ice cream
4 The Broadway	Furniture store	Barnes Upholstery	7x8	Comparison retail	Antique furniture
5 The Broadway	Furniture store	Henry	6x9	Comparison retail	Sofas, chairs
6 The Broadway	Furniture vacant? (Hard to tell)	Herts and Crowns	5x8	Comparison retail	
9-11 white hart lane	Supermarket	Sainsburys Local	22x20	Convenience retail	
7 White Hart Lane	Womens clothing	Marco Tripoli	4x7	Comparison retail	Boutique luxury clothing
5 White Hart Lane	Thai restaurant	Sakunthala's	5x12	A3	
3 White Hart Lane	Café	Orange Pekoe	5x7	A3	Afternoon tea
1 White Hart Lane	Architects	Barnsley Hewett and Mallinson	15x6	A2	
7 White Hart Lane	Indian Restaurant	Hawei	6x10	A3	
8 White Hart Lane	Women's clothing	Bazar	5x12	Comparison retail	
9 White Hart Lane	Dry cleaning	Riverside dry cleaning	6x15	A1	
49 White Hart Lane	Hairdressers	Pelo	6x5	A1	
38 White Hart Lane	Restaurant	Annies	12x15	A3	
40 White Hart	Women's clothing	Chattertons	5x15	Comparison	Designer

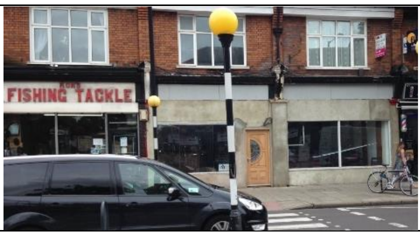
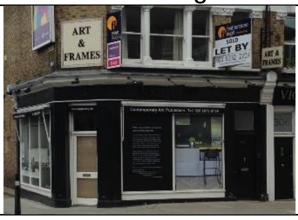
Lane				retail	clothing
42 White Hart Lane	Off License	Continental Store	6x15	Convenience retail	Basic goods
44 White Hart Lane	Flower shop	Flower room	1x15	A1	
45 White Hart Lane	Dog shop	The Waggery	6x10	A1	Dog grooming
48 White Hart Lane	Womenõs clothing	True Love	5x10	Comparison retail	
	Skin care	Skin Philosophy	5x8	A2	
52 White Hart Lane	Furniture store	JK	6x10	Comparison retail	Furniture for bedroom, living room
54 White Hart Lane	Laundry services	Automat	4x12	A1	
56 White Hart Lane	Café	Gusto and relish	8x10	A3	Home cooked food
58 White Hart Lane	Hairdressers	Sinead Kelly	6x12	A1	
60 White Hart Lane	Furniture	Taylor and Marr	6x10	Comparison retail	Carpets, wall paper
75 White Hart Lane	Pub	The Tree House	15x20	A4	Mixture of ales, lagers, hot food
77 White Hart Lane	Library store	Little Library	6x8	A1	
62 White Hart Lane	Beauty store	Super natural	6x12	A1	
64 White Hart Lane	Nails	Lux spa	6x14	A1	
68 White Hart Lane	Furniture	Tobias and the angle	20x20	Comparison retail	Antiques, sofas, chairs
70 White Hart Lane	Estate agent	Carter Jonas	6x14	A2	
72 White Hart Lane	Art gallery	Sister gallery	6x14	Comparison retail	
74 White Hart Lane	Takeaway	China Chef	7x5	A5	
139 White Hart Lane	Hairdressers	Barber shop	5x8	A1	
149 White Hart Lane	Off License	KSN	5x12	Convenience retail	
153 White Hart Lane	Off license	RAMA	10x12	Convenience retail	
155 White Hart Lane	Dry cleaning	Specialist dry cleaning	7x10	A1	
157 White Hart Lane	Hairdressers	McLarenõs	5x12	A1	

APPENDIX 4: SCHEDULE OF VACANT TOWN CENTRE UNITS

East Sheen Schedule of Vacant Premises

Address	57 Sheen Lane
Last use	Shining Light coaching (dissolved 16 May 2017)
Floor space size	5 x 9 45 m^2
Agent details	Featherstone Leigh
Image	
Address	59 Sheen Lane
Last use	Stewarts Pharmacy but also Ruth Mulholland Photography
Floor space size	5x8 40 m^2
Agent details	
Address	61 Sheen Lane
Last use	Bespoke Sheen- Fitted furniture supplier
Floor space size	5x6 30 m^2
Agent details	Baron

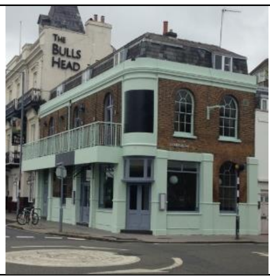
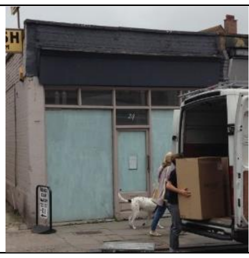
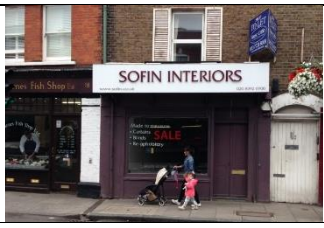
	
Address	69A Sheen Lane
Last use	Lazeez Deli- Indian Takeaway
Floor space size	4x6 24 m^2
Agent details	Baron
	
Address	42 Sheen Lane
Last use	Threshers
Floor space size	5 x 14 x 8 x 4 (L shape) 180 m^2
Agent details	None
Image	
Address	1 Parkway House
Last use	D + G family law
Floor space size	100m^2
Agent details	Lawrence Smith
Address	417 Upper Richmond Road West
Last use	Businesses services
Floor space size	100 m^2
Agent details	Featherstow Leigh

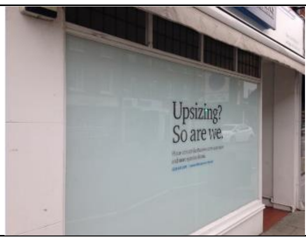
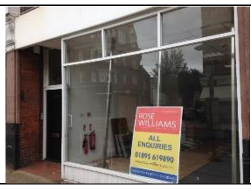
	
Address	427A Upper Richmond Road West
Last use	Clothes/jewellery
Floor space size	80 m^2
Agent details	Apparent
	
Address	467-469 Upper Richmond Road West
Last use	Restaurant
Floor space size	160 m^2
Agent details	Barnard Marcus
	
Address	499 Upper Richmond Road West
Last use	Builder and design
Floor space size	150 m^2
Agent details	Featherstow Leigh
	
Address	308 Upper Richmond Road West
Last use	Art Gallery
Floor space size	140 m^2
Agent details	Featherstow Leigh
	
Address	282 Upper Richmond Road West
Last use	Dry cleaners
Floor space size	50 m^2

Agent details	None
	
Address	345 Upper Richmond Road West
Last use	Vacant Bank
Floor space size	Goad plan
Agent details	170 m^2
	
Address	357 Upper Richmond Road West
Last use	HSBC Bank
Floor space size	230 m^2
Agent details	CBRE
	
Address	245 Upper Richmond Road West
Last use	The Sheen Art Gallery
Floor space size	110 m^2
Agent details	None
Address	158 Upper Richmond Road West
Last use	Vacant
Floor space size	170 m^2
Agent details	None
	
Address	119 Sheen Lane
Last use	Charity shop
Floor space size	100 m^2
Agent details	Baron

Barnes Schedule of Vacant Premises

Address	37 Barnes High Street
Last use	Restaurant
Floor space size	160m^2
Agent details	None
	
Address	36A Barnes High Street
Last use	Not Known
Floor space size	50m^2
Agent details	None
Address	24 Barnes High Street
Last use	Vacant before
Floor space size	80m^2
Agent details	None
	
Address	19 Barnes High Street
Last use	Not Known
Floor space size	40 m^2
Agent details	Vause Cribb
	
Address	67 Barnes High Street
Last use	Hamptons International estate agent
Floor space size	110m^2
Agent details	Lampton Smith Hampton

	
Address	15 Barnes High Street
Last use	Bank
Floor space size	220m^2
Agent details	None
	
Address	82 Church Road
Last use	Barnard Marcus estate agent
Floor space size	100m^2
Agent details	Rose Williams
	
Address	88 Church Road
Last use	Monzil Tandoori
Floor space size	100m^2
Agent details	Stiles Harold Williams
	
Address	102 Church Road
Last use	Vacant. Application for Ladbrokes in 2013
Floor space size	160m^2
Agent details	None
	
Address	175 Church Road
Last use	Castelnau Tiles (Downsized to further down street). Vacant since January 2017
Floor space size	220 m^2
Agent details	Vause Cribb

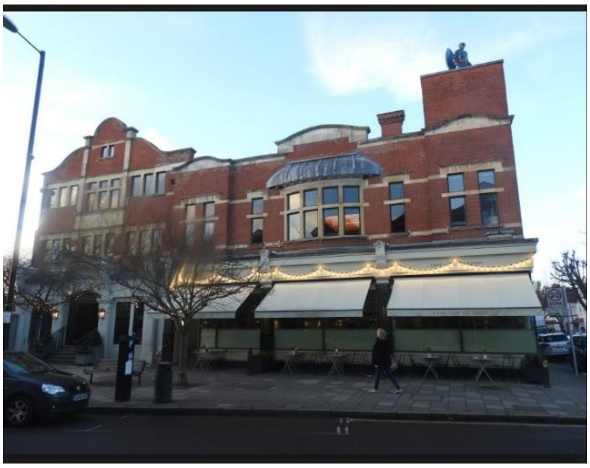
White Hart Lane Schedule of Vacant Premises

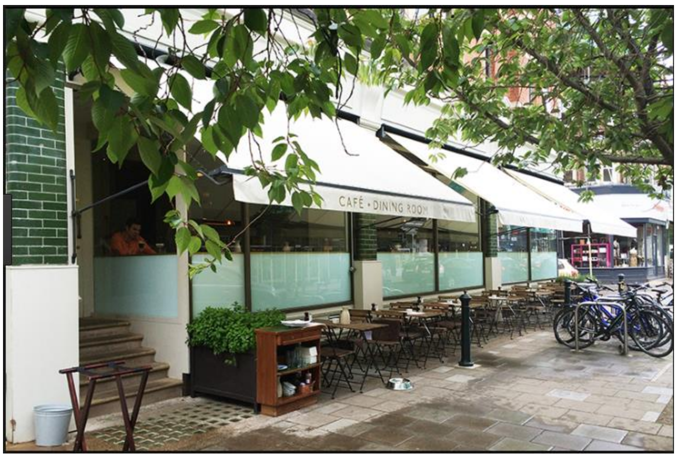
Address	10 the Broadway
Last use	No indication of previous use but soon to be Skin Rich. In process of refurbishing shop.
Floor space size	6x10
Agent details	None
Address	44 White Hart Lane
Last use	Carter Jonas
Floor space size	6 x 8
Agent details	None
Address	50 White Hart Lane
Last use	My Face Doctor
Floor space size	6 x 8
Agent details	Willmotts

APPENDIX 5: SCHEDULE OF LOCAL CINEMA PROVISION

Barnes Cinema Provision

Type of cinema offer (main stream, ethnic, art house, specialist)	Exclusive cinema offer with luxury seats and private members club set in early 20^{th} century building
Operator	Olympic studios
Number of Screens	2 Screens
Number of seats for each screen	Screen 1- 130 seats Screen 2- 71 seats
Type of technology installed	Barco DP2K-20C DLP Cinema Projector (2048 x 1080) Dolby Atmos 3D Sound system with 64 speakers White screen, Active 3D Glasses Pulse CD/USB Audio Media Player
Retail offer	Café + Dining Room (Serves breakfast, lunch, afternoon tea and dinner). License for outdoor seating Members club- hosts private dinner parties with access to music room Annual membership £500 and currently a waiting list Music room- boutique cocktail bar and party space Events such as stand-up comedy
Opening Times	The box office phone lines are open for ticket bookings from 09:00 - 21:00. Earliest showing at 10am with latest 21.20
Number of films being shown/film names	4 or 5 films a day including most recent films. -Despicable Me 3 - The beguiled -Planet of the Apes - Dunkirk - Baby Driver





Other Cinemas in the Wider Area

Odeon Putney High Street

- Main stream cinema
- £11 for adult
- 3 screens
- Retail offer: Costa, Thai Square restaurant
- Screen 1- 258 seats, Screen 2 - 222 seats, Screen 3- 105 seats
- Digital AES Sound
- Premier and club seats
- 10.30 to 20.45 showings
- 8 films being shown (most recent)

Odeon Richmond

- Main stream cinema
- £13.75 for adult
- 7 screens over 2 locations
- Retail offer: Costa, Nandos, GBK, Pizza Express, Strada
- Screen 1- 372 seats, Screen 2- 168, screen 3- 168, screen 4- 69, screen 5- 72, screen 6- 69, screen 7- 88
- Digital AES sound
- Premier seats
- 10 to 20.45 showings
- 9 films being shown (most recent)

Summary of Local Cinema Provision

Cinema	Screens	Seats	Price for adults	Type	Retail offer	No. of Films shown per day
Barnes Olympic Studios	2	201	£16	Exclusive + luxury	Members club, dining room, comedy shows	5
Odeon Putney	3	585	£11	Mainstream	Costa, Thai Square Restaurant	8
Odeon Richmond	7	1006	£13.75	Mainstream	Costa, Nandos, GBK, Pizza express, Strada	9

RPS