

RETAIL AND LEISURE STATEMENT ADDENDUM

Stag Brewery, Mortlake

JCG23233
Retail and Leisure Statement
Addendum
Final
July 2020

REPORT

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
Final	Planning Application	Paul Aldridge		PA	14/07/2020

Approval for issue

Paul Aldridge

14 July 2020

© Copyright RPS Group Plc. All rights reserved.

The report has been prepared for the exclusive use of our client and unless otherwise agreed in writing by RPS Group Plc, any of its subsidiaries, or a related entity (collectively 'RPS'), no other party may use, make use of, or rely on the contents of this report. The report has been compiled using the resources agreed with the client and in accordance with the scope of work agreed with the client. No liability is accepted by RPS for any use of this report, other than the purpose for which it was prepared. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report. RPS does not accept any responsibility or liability for loss whatsoever to any third party caused by, related to or arising out of any use or reliance on the report.

RPS accepts no responsibility for any documents or information supplied to RPS by others and no legal liability arising from the use by others of opinions or data contained in this report. It is expressly stated that no independent verification of any documents or information supplied by others has been made. RPS has used reasonable skill, care and diligence in compiling this report and no warranty is provided as to the report's accuracy. No part of this report may be copied or reproduced, by any means, without the prior written consent of RPS.

Prepared by:

Prepared for:

RPS

Reselton Properties Limited

Paul Aldridge

Planning Director

20 Farringdon Street
London, EC4A 4AB

T +44 20 3691 0500

E aldridgep@rpsgroup.com

Contents

1	INTRODUCTION.....	1
2	THE PROPOSED DEVELOPMENT.....	4
3	SITE DESIGNATION	5
4	RETAIL AND LEISURE POLICY.....	6
5	RETAIL AND LEISURE EVIDENCE BASE.....	7
6	LOCAL RETAIL AND LEISURE PROVISION	8
7	SEQUENTIAL TEST	9
8	IMPACT ASSESSMENT	10
9	CONCLUSIONS.....	12

1 INTRODUCTION

- 1.1 This Retail and Leisure Statement Addendum has been prepared by RPS as a revised submission document to the RPS Retail and Leisure Statement (February 2018 – Revised 27th September 2019) submitted under Applications A, B and C (refs. 18/0547/FUL, 18/0548/FUL and 18/0549/FUL) ('the Applications'), in respect of the former Stag Brewery Site in Mortlake ('the Site') within the London Borough of Richmond Upon Thames ('LBRuT'). The Applications are for the comprehensive redevelopment of the Site. This document has been prepared on behalf of Reselton Properties Limited ('the Applicant'). A summary of the Applications is set out below:
- a) Application A – hybrid planning application for comprehensive mixed use redevelopment of the former Stag Brewery site consisting of:
 - i. Land to the east of Ship Lane applied for in detail (referred to as 'Development Area 1' throughout); and
 - ii. Land to the west of Ship Lane (excluding the school) applied for in outline (referred to as 'Development Area 2' throughout).
 - b) Application B – detailed planning application for the school (on land to the west of Ship Lane).
 - c) Application C – detailed planning application for highways and landscape works at Chalkers Corner.
- 1.2 This document replaces the Retail and Leisure Statement (February 2018 – Revised 27th September 2019) as well as the Applicant's response to LBRuT policy comments (May 2019).
- 1.3 The Applications were submitted in February 2018 to LBRuT. The Applications are related and were proposed to be linked via a Section 106 Agreement. In May 2019, a package of substitutions was submitted to LBRuT for consideration, which sought to address comments raised by consultees during determination. On 29 January 2020, the Applications were heard at LBRuT's Planning Committee with a recommendation for approval. This scheme is thereafter referred to as "the Original Scheme".
- 1.4 The Committee resolved to grant Applications A and B, and refuse Application C. The granting of Applications A and B was subject to the following:
- a) Conditions and informatives as set out in the officer's report, published addendum and agreed verbally at the meeting;
 - b) Amendments to the Heads of Terms and completion of a Section 106 Legal Agreement which was delegated to the Assistant Director to conclude;
 - c) No adverse direction from the Greater London Authority ('GLA'); and
 - d) No call in by the Secretary of State for Housing, Communities and Local Government.
- 1.5 The Applications have been referred to the GLA and the Mayor has given a direction that he will take over the determination of the Applications and act as local planning authority in relation to all three applications.
- 1.6 The Applicant has engaged with the GLA in respect of the proposed amendments to the scheme, referred to throughout this document as the 'Revised Scheme'. As a result of these discussions, a number of changes have been made to the scheme proposals which are summarised as follows:

- a) Increase in residential unit provision from up to 813 units (this includes the up to 150 flexible assisted living and / or residential units) to up to 1,250 units;
- b) Increase in affordable housing provision from up to 17% to up to 30%;
- c) Increase in height for some buildings, of up to three storeys compared to the Original Scheme;
- d) Change to the layout of Buildings 18 and 19, conversion of Block 20 from a terrace row of housing to two four storey buildings;
- e) Reduction in the size of the western basement, resulting in an overall reduction in car parking spaces of 186 spaces, and introduction of an additional basement storey beneath Building 1 (the cinema);
- f) Other amendments to the masterplan including amendments to internal layouts, re-location and change to the quantum and mix of uses across the Site, including the removal of the nursing home and assisted living in Development Area 2;
- g) Landscaping amendments, including canopy removal of four trees on the north west corner of the Site; and
- h) Associated highways works may be carried out on adopted highways land.

- 1.7 The submission documents have tested an affordable housing provision of 30%. However, it should be noted that the final affordable housing level is subject to further viability testing and discussions with the GLA.
- 1.8 Minor amendments have also been made to the road and pedestrian layouts for the school (Application B). No other amendments are proposed to Application B. No amendments are proposed to the physical works proposed under Application C, although alternative options within the highway boundaries for mitigating the highway impact of the amended proposals have been assessed within the relevant substitution documents for Applications A and B and are the subject of ongoing discussions with the GLA and TfL.
- 1.9 A more detailed summary is included within the Planning Statement Addendum and Design and Access Statement Addendum submitted with the Revised Scheme documents.
- 1.10 These changes are being brought forward as substitutions to Applications A, B and C (refs. 18/0547/FUL, 18/0548/FUL and 18/0549/FUL), which are related applications (to be linked via a Section 106 Agreement).
- 1.11 It is important to note that no changes are proposed to the physical works proposed under Application C – the only change to this application is that the supporting documents (which include all documents submitted under Applications A and B) have been updated in the context of the proposed changes to the scheme as sought under Applications A and B. Application C was resolved to be refused by LBRuT at Committee on 29 January 2020. As a result, whilst the works proposed in Application C are still an available option, the Applicant has progressed alternative approaches for addressing and mitigating the impacts on surrounding highways, and these have been tested within the relevant substitution documents for Applications A and B. All of these options are subject to ongoing discussions and testing with TfL. They are all within the existing highway boundaries and if agreed would not, in themselves, require planning consent.
- 1.12 Accordingly, Application C remains 'live' within this substitution package
- 1.13 This Addendum is solely concerned with matters relating to the retail and leisure component of the proposals, the primary changes to which are described in Section 2.

- 1.14 This Addendum adopts the same headings as the RPS Retail and Leisure Statement (February 2018 – Revised 27th September 2019).
- 1.15 This Addendum principally addresses the following key matters:
- Planning policy changes (Richmond Local Plan, the London Plan and the NPPF)
 - Flexible floorspace composition
 - The vitality and viability of relevant nearby town centres
 - The expenditure associated with the proposed residential population of the proposals
 - The potential effects (impact) of the proposals upon nearby relevant town centres
- 1.16 Significantly, the above matters are considered against the analysis provided in the committee report relating to original scheme (Application A).
- 1.17 With respect to the retail and leisure assessment the committee report for the original scheme reached the following conclusion (paragraph 7.1.41 refers):
- “The proposal provides a genuine mixed use development, creating opportunities for vibrant street frontages, green spaces, squares and public realm. In this instance, the quantum of commercial floorspace does exceed the expected ‘need’ as outlined in the Richmond Retail Study. However, the acceptability of retail planning relates to impact of rather than need. Given the aforementioned reasons; aspirations of the allocation SA 24 and the Brief to create a new heart and centre on this site; the scale of the residential development, and conditions to limit retail and size of units, the quantum is deemed acceptable and will not result in an unacceptable adverse impact on the viability and vitality of nearby centres, will not result in unacceptable trade draw to local centres and will serve the day to day needs of the sites occupants. Further the community uses are welcomed and assist in creating a sense of place.”*
- 1.18 As this Addendum demonstrates, these conclusions remain valid and transferrable to the revised scheme, namely that the small increase in flexible floorspace proposed (including a small increase to the maximum floorspace caps) is consistent with the ‘need’ set out in the Richmond Retail Study and the Local Plan allocation of the site for mixed use development. The like the original scheme, the revised proposals would not result in significant adverse impacts upon local town centres.
- 1.19 The next section of this Addendum describes the changes between the original and revised application proposals in so far as they are relevant to this Addendum.

2 THE PROPOSED DEVELOPMENT

- 2.1 The revised proposals for the application site propose to increase the number of residential units from 663 up to 1,250 units (+587 units) together with an increase in the amount of office floorspace (from 2,417sqm to 5,532sqm GIA), flexible uses (from 4,686sqm to 5,023sqm GIA) and a reduction in the size of the cinema (2,120sqm to 1,606sqm GIA). The gym has been removed from the scheme (-740sqm).
- 2.2 The previous proposals for a care home and assisted living are omitted from the revised proposals.
- 2.3 In relation to the 'flexible uses', and consistent with the approach previously proposed, the Applicant intends to limit the use of the proposed flexible use floorspace by reference to maximum floorspace caps for different uses.
- 2.4 These caps are summarised below and have been amended slightly by the Applicant as part of the submission.

Use Class	Minimum sqm GIA	Maximum sqm GIA
Class A1		2,200sqm
Class A2		220sqm
Class A3		2,400sqm
Class A4		1,800sqm
Class B1	2,000sqm	2,200sqm
Class D1		1,300sqm
Sui Generis (Boathouse)		380sqm
Total	5,023sqm	5,023sqm

- 2.5 This Addendum is solely concerned with the assessment of the proposed Class A and D1 (cinema) uses.
- 2.6 In order to provide an up to date assessment of the revised proposals consistent with the previous Statement, RPS has undertaken further field work in August 2019 to determine the health of relevant nearby town centres. This field work informs our assessment of the potential effects of the revised proposals on town centres.
- 2.7 The amount and the nature of the proposed retail and leisure floorspace has not significantly changed meaning that the assessment set out within the RPS Retail and Leisure Statement remains robust and valid.
- 2.8 This Addendum follows the same agreed methodology for assessing the proposals against local and national retail and leisure planning policy tests, these primarily relate to the sequential approach and impact.
- 2.9 Our latest field work enables comparisons to be drawn with the surveys of town centres undertaken in July 2017 which informed the RPS Retail and Leisure Statement (February 2018 – Revised 27th September 2019).
- 2.10 The next section of this Addendum provides a review of the position regarding the policy designation of the application site.

3 SITE DESIGNATION

- 3.1 The Richmond Local Plan was adopted by the Council on 3rd July 2018. The Council adopted limited amendments to the Plan on 3rd March 2020.
- 3.2 The policies of the Local Plan relating to the consideration of the proposed retail and leisure uses remain the same as per the assessment for the original scheme set out in the January 2020 committee report (referred to previously) and considered by the RPS Retail and Leisure Statement (revised September 2019)
- 3.3 The Local Plan supersedes the previous Core Strategy and Development Management Policies and saved policies of the Richmond Up Thames Unitary Development Plan.
- 3.4 The RPS Retail and Leisure Statement considered the original proposals against the draft local plan, since then, few changes have been made to the policies relevant to the consideration of the proposals.
- 3.5 The allocation of the application site remains the same as previously assessed.
- 3.6 Adopted policy SA24 reaffirms that:

“The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. 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.”

- 3.7 The policy continues to support a ‘new village heart and centre’ for Mortlake including ‘retail and other employment generating uses...and leisure uses’. The revised application proposals remain consistent with the allocation of the site in the Local Plan.
- 3.8 The next section of Addendum examines the position regarding general retail and leisure planning policy applicable to the consideration of the revised application proposals.

4 RETAIL AND LEISURE POLICY

- 4.1 The RPS Retail and Leisure Statement provides a summary of relevant retail and leisure policies applicable to the assessment of the application policies (section 4 refers).
- 4.2 There have been no changes to retail and leisure policy that affect the assessment of the revised proposals. In this respect, the conclusions of the RPS Retail and Leisure Assessment remain robust and are directly transferable to the consideration of the revised scheme.
- 4.3 Following the publication of the Panel Report in October 2019, the Mayor of London issued an Intend to Publish London Plan in December 2019. On the 13th March 2020 the Secretary of State (SoS) Directed the Mayor not to publish the London Plan until the matters set out in his letter and annex are addressed.
- 4.4 Significantly, none of the draft policies relating to retail and leisure uses are subject of any Direction and these have not materially changed from previous versions of the draft London Plan. In accordance with paragraph 48 of the NPPF significant weight can be afforded to policies which are not subject of the SoS Direction. The revised proposals are compliant with the retail and leisure policies of the Intend to Publish London Plan 2019.
- 4.5 The proposals are required to be determined in accordance with the policy framework prevailing at the time a decision is made. Changes to the Local Plan and the emerging changes to the London Plan make no difference to the assessment of retail and leisure issues, accordingly the original analysis remains valid and robust.
- 4.6 In July 2018 the Government published a revised National Planning Policy Framework (NPPF). The NPPF was again updated in February 2019 in relation to matters primarily relating to housing. Furthermore, the Government issued updated National Planning Policy Guidance in July 2019.
- 4.7 Although the NPPF and NPPG are organised differently and there are subtle changes to the wording, critically, the key policy tests applicable to new retail and leisure developments have not changed and continue to comprise the sequential approach to site selection (i.e. town centre first policy) and impact.
- 4.8 The sequential approach is applicable to all proposals outside town centres except where sites are allocated for a retail and/or leisure use in an up to date Local Plan.
- 4.9 Accordingly, the assessment of the application proposals set out in the RPS Retail and Leisure Statement remains valid as there has been no change to the Government's policy in terms of assessing new retail and leisure uses.
- 4.10 Indeed, as the previous section of this Addendum records, the application site continues to be allocated in an up to date local plan for mixed use development including retail and leisure uses.
- 4.11 In summary, the policies against which the application proposals must be assessed have not changed. In this respect the conclusions reached by the RPS Retail and Leisure Statement are directly transferable to the current proposals.

5 RETAIL AND LEISURE EVIDENCE BASE

- 5.1 The information set out in the RPS Retail and Leisure Statement in section 5 (Retail and Leisure Evidence Base) remains up to date and the conclusions are directly relevant to the consideration of the revised application proposals.

6 LOCAL RETAIL AND LEISURE PROVISION

- 6.1 Section 6 of the RPS Retail and Leisure Statement provides a commentary on local retail and leisure provision comprised within nearby relevant local town centres. This was based upon survey information as at July 2017.
- 6.2 The centres surveyed included; East Sheen (district centre), Barnes (local centre), Kew Gardens (local centre) and White Hart Lane (neighbourhood centre).
- 6.3 RPS re-surveyed the various local town centres in August 2019. Critically the conclusions reached by the RPS Retail and Leisure Statement (February 2018) in terms of the vitality and viability of the various centres remain valid. The August 2019 survey findings also remain valid and are representative of the general vitality and viability of these centres today.
- 6.4 Given the current pandemic, it has not been possible to re-survey these various centres. Nevertheless, given the role and function of these centres, prevailing market conditions (prior to the pandemic) and our experience of having monitored the centres over the two year period from July 2017 to August 2019, it is very unlikely that these centres would have experienced any significant variance in terms of levels of vacancies or composition since August 2019.
- 6.5 Our August 2019 survey of centres demonstrates that there have been very few changes to the centres. Importantly they remain vibrant and viable and continue to perform their designated role and function within the hierarchy of centres.
- 6.6 The table below provides a comparison of the number of vacant units within each of the centres.

Centre	Number of Vacant Units	
	July 2017	August 2019
East Sheen	17	16
Barnes	10	3
Kew Gardens Station	0	0
White Hart Lane	3	0

- 6.7 As can be seen, the level of vacant units in 2017 and 2019 is comparable, albeit there has been an improvement in the vacancy rate generally. These levels of vacancy should give no cause for any concern.
- 6.8 Whilst there have been changes to the occupancy of some of the units within each centre, each centre continues to have a diverse mix of uses which make an important contribution to the vitality and viability of each centre.
- 6.9 In summary, the August 2019 survey of centres undertaken by RPS reaffirms the conclusions reached by paragraphs 6.30-6.31 of the RPS Retail and Leisure Statement (February 2018 – Revised 27th September 2019), namely that each of the four centres are healthy with good signs of vitality and viability. We would not expect any significantly different changes to prevail in respect to the vitality and viability of these centres in the immediate future.

7 SEQUENTIAL TEST

- 7.1 Section 7 of the RPS Retail and Leisure Statement assesses the application proposals against the sequential test.
- 7.2 Although the Government has updated the NPPF and the NPPG, nothing has changed in terms of the way applicants should assess proposals in relation to the sequential test.
- 7.3 Whilst the application proposals have been revised, the nature of the proposals mean that they should continue to be tested in the same manner as set out in the RPS Retail and Leisure Statement. Fundamentally, the conclusions reached by the that assessment remain robust and valid.
- 7.4 The proposed retail and leisure component of the revised application proposals are of a similar scale and nature to those previously proposed (and assessed) and these broadly accord with the policy allocation of the application site in the Local Plan for mixed use development including retail and leisure uses.
- 7.5 The level of vacant retail floorspace within local town centres has improved since that surveyed in July 2017. The overall amount and type of vacant floorspace is not suitable to accommodate the application proposals.
- 7.6 There are no sites within East Sheen or indeed the smaller centres which are suitable and available to accommodate the revised proposals for the application site.
- 7.7 In conclusion, there is nothing in national, regional or local planning policy which requires the applicant to conduct the sequential test differently to that previously undertaken in the RPS Retail and Leisure Statement. Accordingly, the key conclusions reached by Section 7 of that Statement remain valid, i.e. that there are no sequentially preferable sites upon which to accommodate the application proposals in or to the edge of relevant local town centres.

8 IMPACT ASSESSMENT

- 8.1 Section 8 of the RPS Retail and Leisure Statement assesses the proposals in terms of their potential effects upon relevant local town centres.
- 8.2 As evidenced by the previous sections of this Addendum, local town centres remain healthy. Accordingly, the base position in terms of the health of town centres remains as per that previously assessed by the RPS Retail and Leisure Statement.
- 8.3 The revised proposals for the application site result in a small increase in flexible use floorspace (up to +337sqm GIA) and a reduction in the proposed cinema (-514sqm GIA) and the omission of the gym. The increase in flexible use floorspace is negligible and the associated turnover is directly supported by an increase in available expenditure generated by the larger residential population of the revised scheme.
- 8.4 Against this background, the overall conclusions reached by the RPS Retail and Leisure Statement (February 2018 – Revised September 2019) and previous clarifications (3rd May 2019) provided to the Council in response to comments raised by officers (12th February 2019) remain valid.
- 8.5 Significantly, the revised proposals for the application site result in an increase in the number of residential units (+587 units). The associated residential population will generate additional local expenditure more than capable of supporting (offsetting) any increased turnover associated with the proposed increase in retail and leisure floorspace as a well as other retail and leisure facilities in the wider local area including those shops and services in local town centres, such as East Sheen.
- 8.6 The increased residential population of the scheme is therefore likely to result in a reduction in the levels of impact previously forecast by the RPS Retail and Leisure Statement (notwithstanding the proposed small increase in the amount of flexible floorspace +337sqm GIA).
- 8.7 The revised scheme proposes up to 1,250 new residential units, approaching double that previously proposed, meaning that the potential population of the residential component of the proposed scheme will increase from 1,850 (as set out at paragraph 8.40 of the RPS Retail and Leisure Statement) to 2,868.
- 8.8 In turn, the forecast expenditure derived from the proposed residential population of the scheme will rise from £14.12M by 2024 to £27.45M (comparison, convenience and food and beverage expenditure)(see paragraph 8.42 of the Retail and Leisure Statement). This compares to the forecast turnover potential of the proposed flexible floorspace (comparison, convenience and food & beverage floorspace) of circa £20.968M (update to table set out at paragraph 8.48 of the RPS Retail and Leisure Statement using the latest floorspace figures and based upon the same methodology, representing a small increase in turnover of £1.46M).
- 8.9 In summary, whilst recognising that not all the expenditure generated by the new residential population would be spent in shops at the application site, it is clear that the level of expenditure exceeds that of the turnover of the proposed retail and leisure floorspace by £6.49M (£27.45M compared to £20.96M). In these simple terms, the proposed retail and leisure floorspace of the proposed scheme is entirely capable of being supported by the residential population of the revised scheme with surplus expenditure able to support local town centres.
- 8.10 Accordingly, the levels of impact assessed in respect of the original scheme (up to 1.3% for East Sheen, paragraph 8.56 of the RPS retail and Leisure Statement refers) are over stated and will reduce, offset by the additional expenditure generated by the increased residential population of the revised scheme.
- 8.11 Furthermore, the increased level of expenditure associated with the proposed residential population of the revised scheme is likely to mean existing town centre shops and services will also benefit.
- 8.12 In all other respects the conclusions reached by the RPS Retail and Leisure Statement remain robust and valid. Namely that the application proposals would not have a significant adverse effect upon

town centres. On the contrary, the proposals are appropriate in their scale and consistent with the Local Plan policy allocation of the site for a new centre including retail and leisure uses.

- 8.13 The proposals would not jeopardise investment in town centres. Local town centres are healthy and vibrant and have a good mix and diverse range of uses and activities. The centres are well placed to withstand the limited levels of trade diversion forecast to arise and in any event growth in expenditure generally will mean any perceived impacts will be very short lived and that the enhanced residential population of the revised scheme will benefit local town centres in terms of support given to them by increase local expenditure.
- 8.14 Similarly, the proposed reduction in the size of the proposed cinema planned for the application site (from 2,120sqm to 1,606sqm GIA) means that the potential effects of the proposed development upon local cinemas will decrease. Even so, as the RPS Retail and Leisure Statement demonstrates, there remains a requirement for additional cinema screens within this part of the Borough.
- 8.15 In summary, the revised proposals will have a limited effect upon local town centres. The proposals will not result in any significant harmful effects. The conclusions of the RPS Retail and Leisure Statement remain valid and robust and are consistent with the conclusions reached by the committee report for the original scheme (paragraph 4.1.42 refers).

9 CONCLUSIONS

- 9.1 In conclusion, this Addendum identifies a limited number of changes have been made to retail and leisure planning policies since the RPS Retail and Leisure Statement was prepared. In addition, the amount and composition of the proposed land uses at the Stag Brewery site has altered since submission of the Application in February 2018. Those changes do not alter the overall conclusions reached by the RPS Retail and Leisure Statement. This Addendum reaches the following conclusions:
- Local town centres remain healthy.
 - There are no sequentially preferable sites, suitable and available to accommodate the application proposals.
 - The proposed retail and leisure floorspace will be directly supported by a combination of the general forecast growth in available expenditure and the new residential and working population of the proposed development. Significantly, the proposed turnover of the retail and leisure floorspace can be met entirely by the spending power of the new residential population of the scheme without any additional impact.
 - The quantum and nature of the proposed retail and leisure uses are entirely appropriate and accord with the policy allocation of the site in the Local Plan.
 - The application site is allocated for mixed use development including a new centre with retail and leisure uses.
 - The proposed retail and leisure facilities will perform a local role meeting the needs of the proposed residential and working population of the proposed scheme.
 - The increased spending power of the scheme's residential population will benefit and directly support shops and services in local town centres.
 - Levels of predicted impact are negligible and will not result in significant adverse harm. Any impacts would be readily absorbed having regard to the forecast growth in expenditure generally. Once the increased spending power of the proposed residential population is factored in, levels of impact will decline.
- 9.2 In summary, consistent with the overall conclusions reached by the RPS Retail and Leisure Statement, this Addendum concludes that there are no reasons in terms of retail and leisure planning policy to resist the grant of planning permission for the proposed revised scheme of development for the application site.
- 9.3 The conclusions reached by paragraph 7.1.42 of the committee report relating to the original scheme remains valid in terms of its application to the revised scheme. The small increase in flexible use floorspace and its associated potential turnover is offset by the expenditure derived from the increased residential population of the revised scheme. The level of impact is lower than the original scheme and not significant and there are no sequentially preferable sites to accommodate the revised application scheme.
- 9.4 The proposals fully accord with the allocation of the site in the Local Plan.
- 9.5 There is no conflict with either the policies of the London Plan (current and emerging) and the proposals satisfy the sequential and impact tests set out in the NPPF.