



# **Stag Brewery, Mortlake**

## **Retail and Leisure Statement**

For Reselton Properties

March 2022

## REPORT

### Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
Final	Planning Application	Paul Aldridge		PA	05.03.2022

### Approval for issue

Paul Aldridge	Paul Aldridge	5 March 2022
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# 1 INTRODUCTION

1.1 This Retail and Leisure Statement has been prepared by RPS Consulting Services Limited on behalf of Reselton Properties Limited (“the Applicant”) in support of two linked planning applications (“the Applications”) for the comprehensive redevelopment of the former Stag Brewery Site in Mortlake (“the Site”) within the London Borough of Richmond upon Thames (LBRuT).

## Proposals

1.2 The Applications seek planning permission for:

Application A:

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

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

- a) Demolition of existing buildings (except the Maltings and the façade of the Bottling Plant and former Hotel), walls, associated structures, site clearance and groundworks
- b) Alterations and extensions to existing buildings and erection of buildings varying in height from 3 to 9 storeys plus a basement of one to two storeys below ground
- c) Residential apartments
- d) Flexible use floorspace for:
  - i) Retail, financial and professional services, café/restaurant and drinking establishment uses
  - ii) Offices
  - iii) Non-residential institutions and community use
  - iv) Boathouse
- e) Hotel / public house with accommodation
- f) Cinema
- g) Offices
- h) New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works
- i) Provision of on-site cycle, vehicle and servicing parking at surface and basement level
- j) Provision of public open space, amenity and play space and landscaping
- k) Flood defence and towpath works
- l) Installation of plant and energy equipment

Planning permission is also 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 8 storeys
- b) Residential development
- c) Provision of on-site cycle, vehicle and servicing parking
- d) Provision of public open space, amenity and play space and landscaping

- e) New pedestrian, vehicle and cycle accesses and internal routes, and associated highways works”

Application B:

“Detailed planning permission for the erection of a three-storey building to provide a new secondary school with sixth form; sports pitch with floodlighting, external MUGA and play space; and associated external works including landscaping, car and cycle parking, new access routes and other associated works”

- 1.3 Together, Applications A and B described above comprise the ‘Proposed Development’.

### **Background to Submission**

- 1.4 The Applications follow earlier planning applications which were refused by the Greater London Authority and the GLA. The refused applications were for:

- 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.

- 1.5 The LBRuT (the Council) originally resolved to grant planning permission for Applications A and B but refuse Application C.

- 1.6 Following the LBRuT’s resolution to approve the applications A and B, the Mayor called-in the Applications and became the determining authority. The Mayor’s reasons for calling in the Applications were set out in his Stage II letter (dated 4 May 2020) but specifically related to concerns regarding what he considered was a low percentage of affordable housing being proposed for the Site and the need to secure a highways solution for the scheme following the LBRuT’s refusal of Application C.

- 1.7 Working with the Mayor’s team, the Applicant sought to meaningfully respond to the Mayor’s concerns on the Applications. A summary of the revisions to the scheme made and submitted to the GLA in July 2020 is as follows:

- i. Increase in residential unit provision from up to 813 units to up to 1,250 units;
- ii. Increase in affordable housing provision from (up to) 17%, to 30%;
- iii. Increase in height for some buildings of up to three storeys;
- iv. Change to the layout of Blocks 18 and 19, conversion of Block 20 from a terrace row of housing to two four storey buildings;
- v. Reduction in the size of the western basement, resulting in an overall car parking spaces reduction of 186 spaces and introduction of an additional basement storey under Block 1;
- vi. Internal layout changes and removal of the nursing home and assisted living in Development Area 2;
- vii. Landscaping amendments, including canopy removal of four trees on the north west corner of the Site; and
- viii. Alternative options to Chalkers Corner in order to mitigate traffic impacts through works to highway land only and allow the withdrawal of Application C.

- 1.8 The application was amended to reflect these changes.

- 1.9 Notwithstanding this, and despite GLA officers recommending approval, the Mayor refused the applications in August 2021.

- 1.10 The Mayor's reasons for refusal in respect of Application A were:
- ix. height, bulk and mass, which would result in an unduly obtrusive and discordant form of development in this 'arcadian' setting which would be harmful to the townscape, character and appearance of the surrounding area;
  - x. heritage impact. The proposals, by reason of its height, scale, bulk and massing would result in less than substantial harm to the significance of several listed buildings and conservation areas in the vicinity. The Mayor considered that the less than substantial harm was not clearly and convincingly outweighed by the public benefits, including Affordable Housing, that the proposals would deliver;
  - xi. neighbouring amenity issues. The proposal, by reason of the excessive bulk, scale and siting of Building 20 and 21 in close proximity to the rear of neighbouring residential properties in Parliament Mews and the rear gardens of properties on Thames Bank, would result in an unacceptable overbearing and unneighbourly impact, including direct overlooking of private amenity spaces. The measures in the Design Code would not sufficiently mitigate these impacts; and
  - xii. no section 106 agreement in place.
- 1.11 Application B was also refused because it is intrinsically linked with Application A and therefore could not be bought forward in isolation.

### **The Proposed New Scheme**

- 1.12 This 3<sup>rd</sup> iteration of the scheme seeks to respond directly to the Mayor's reasons for refusal and in doing so also addresses a number of the concerns raised by the LBRuT.
- 1.13 The amendments can be summarised as follows:
- xiii. A revised energy strategy is proposed in order to address the London Plan (2021) requirements;
  - xiv. Several residential blocks have been reduced in height to better respond to the listed buildings along the Thames riverfront and to respect the setting of the Maltings building, identified as a Building of Townscape Merit (BTM) by the LBRuT;
  - xv. Reconfiguration of layout of Buildings 20 and 21 has been undertaken to provide lower rise buildings to better respond to the listed buildings along the Thames riverfront; and
  - xvi. Chalkers Corner light highways mitigation works.
- 1.14 The school proposals (submitted under 'Application B') are unchanged. The Applicant acknowledges LBRuT's identified need for a secondary school at the Site and the applications continue to support the delivery of a school. It is expected that the principles to be agreed under the draft Community Use Agreement (CUA) will be the same as those associated with the refused school application (LBRuT ref: 18/0548/FUL, GLA ref: GLA/4172a/07).
- 1.15 Overall, it is considered that together, the Applications respond successfully to the concerns raised by stakeholders in respect of the previous schemes and during pre-application discussions on the revised Proposed Development. As a result, it is considered that the scheme now represents a balanced development that delivers the principle LBRuT objectives from the Site.
- 1.16 Full details of the revised proposals are set out within the Planning Statement prepared by Gerald Eve.

### **Retail and Leisure Statement Scope**

- 1.17 This Statement is solely concerned with matters relating to the 'retail and leisure' component of the proposals, as described in detail in the Planning Statement and summarised in Section 2 below, namely shops, café/restaurants, drinking establishments and a cinema.
- 1.18 This Statement adopts the same headings, approach, and methodology as per the RPS Retail and Leisure Statement (February 2018 – Revised 27<sup>th</sup> September 2019) and Retail and Leisure Statement Addendum (July 2020) which were prepared in support of the refused scheme (referred to above) for the redevelopment of the Site.

- 1.19 This Statement has been prepared following a turbulent period for the retail and leisure sectors, as a result of the Covid-19 pandemic through enforced closures, social distancing and restrictions on travel. Even so, there is evidence to suggest that one of the consequences of workers being confined to working from home has been a renewed focus to shop locally. Many small suburban and neighbourhood centres have benefitted through increased local footfall and patronage. This has often been at the expense of larger centres, for example, the West End and City of London both of which have experienced significant reductions in trade. The pandemic continues to effect economic forecasts. These have fluctuated considerably in the short term. In the longer term, a recovery to pre-pandemic rates is expected and there is already evidence of a rebound in consumer expenditure including increased demand for leisure services. Nevertheless, difficulties relating to the supply and transportation of raw materials and goods as well as post Brexit customs changes continues to affect growth.
- 1.20 This 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 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.
- 1.21 The methodology for assessing the retail and leisure floorspace has previously been agreed with officers of the LBRuT. Consistent with previous assessments, 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, 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, Barnes, Kew Gardens and White Hart Lane
  - 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 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 'appropriateness' of scale of the proposed retail and leisure uses and their potential effects upon local centres having regard to their composition, retail offer and general health.
- 1.22 This Statement presents a review of the local retail and leisure evidence base, which together with RPS fieldwork inform the assessment of the proposed retail and leisure floorspace against local, regional and national policy.
- 1.23 The relevant local retail and leisure evidence base comprises the Richmond Retail Study 2014 and Richmond Upon Thames Retail and Leisure Needs Study Phase 1 Update 2021, 2020 Town Centre Land Use Survey (February 2021) together with the Mayor's London Town Centre Health Check Analysis 2017 and Consumer Expenditure and Comparison Goods Floorspace Need in London October 2017. Reference to the key conclusions of this evidence base relevant to the consideration of the application proposals is made within this Statement
- 1.24 RPS undertook field work in July 2017 and August 2019 and more recently in January 2022 to assess the health of local town centres.
- 1.25 Significantly, the nature and amount of retail and leisure uses has not fundamentally changed from the Applicant's previous proposals to develop the site. Although the development plan has evolved, through the adoption of the London Plan 2021 and changes to the National Planning Policy Framework, policy does not change the way these proposals should be assessed. Accordingly, the assessment of the previous application proposals, by LBRuT and the Mayor in respect of retail and leisure matters are directly transferrable and material to the consideration of these latest application proposals.

- 1.26 LBRuT committee report (29 January 2020) for the refused scheme to redevelop the site reached the following conclusion in relation to retail and leisure planning policy matters (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.”*

- 1.27 Similarly, the Mayor’s Stage 3 report (27 July 2021) reached the following key conclusions in respect of the proposed retail and leisure uses:

*“191. Whilst the specific policy implications of each use are discussed in the following report sections, the overall mix of uses proposed is considered to be consistent with the objectives of the Site Allocation to create a new ‘Village Heart’ for Mortlake. It is noted that the Council raise no concerns with the uses proposed.*

*214. As noted above, the provision of flexible commercial uses (including retail) is consistent with the objectives outlined in Policy LP 25 and Site Allocation SA24 of the Richmond Local Plan, which call for redevelopment of the site to include a mixture of uses generating vibrancy and local employment to create a new ‘Village Heart’ for Mortlake.*

*216. A desired quantum of retail and leisure uses on the site is not outlined in Site Allocation SA24 or the Council’s ‘Stag Brewery, Mortlake, SW14, Planning Brief SPD’. Notwithstanding this, in terms of retail and leisure the proposals are broadly consistent in size and area previously proposed within the scheme as considered by Richmond Council in January 2020. In considering that scheme, Richmond Council officers considered the findings of the Retail and Leisure Statement, prepared by RPS and dated September 2019, and concluded that the quantum of these uses would neither exceed the anticipated retail need nor result in unacceptable adverse impact on the viability and vitality of nearby centres. A Retail and Leisure Statement Addendum (July 2020), has been submitted in support of the amended scheme, which demonstrates that the small increase in flexible use floorspace is offset by the expenditure derived from the increased residential population of the scheme. As such, the scheme would result in a lower level of impact on surrounding centres and remains acceptable. The Council has not raised any objection on this basis.*

*221. Application A proposes both a new cinema and public house land use adjoining the northern edge of Lower Richmond Road. In the above policy context these uses are strongly supported in providing a diversified offering of night-time economy land uses in this Area of Mixed Use....”*

- 1.28 The Mayor’s decision to ultimately refuse planning permission (August 2021) does not refer to any concerns relating to retail and leisure policy matters in the reasons for refusal.

- 1.29 The conclusions drawn in respect of the refused scheme for the site remain valid and directly transferrable to the determination of the latest scheme, namely that the proposed retail and leisure floorspace is consistent with the allocation of the site for mixed use development in the Local Plan. Furthermore, the application proposals would not result in significant adverse impacts upon local town centres.

- 1.30 The remainder of this Statement 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

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- Section 6: Existing Shopping and Leisure Patterns
- Section 7: Sequential Assessment
- Section 8: Impact Assessment
- Section 9: Conclusions

## 2 THE PROPOSED RETAIL & LEISURE DEVELOPMENT

- 2.1 The application proposals comprise up to 4,839sqm GIA 'flexible' uses (Class E uses - shops, financial and professional services, cafes/restaurants, offices; sui generis uses – boathouse, drinking establishments, Class F1 - community uses) including 'retail and leisure uses' and a 1,606sqm GIA cinema (sui generis).
- 2.2 In addition the proposed development includes 1,085 residential units. 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.
- 2.3 The provision of local shops, leisure and services uses close to where people live and work helps to create sustainable communities consistent with the policies of the development plan and the National Planning Policy Framework (NPPF).
- 2.4 The table below compares the latest proposals with the previous scheme of development for the site.

Use	Refused Scheme	Current Proposals	Difference
Flexible Uses	5,023sqm GIA	4,839sqm GIA	-184sqm
Cinema	1,606sqm GIA	1,606sqm GIA	0sqm
Residential	1,250 units	1,085 units	-165 units

- 2.5 As evidenced by the table above, the amount and nature of the proposed retail and leisure floorspace has not significantly changed from the previous scheme, which was assessed as being policy compliant by both LBRuT and the Mayor.
- 2.6 Consistent with the previous approach, the Applicant intends to limit the use of the proposed 'flexible use' floorspace by reference to maximum floorspace caps for different uses. These caps are summarised in the table below.

Use Class/Use	Minimum sqm GIA	Maximum sqm GIA
Shops Class E(a)		2,200sqm
Financial & Professional Services Class E(c)		220sqm
Cafes/Restaurants Class E(b)		2,400sqm
Drinking Establishments (sui generis)		1,800sqm
Offices Class E(g)(i)	2,000sqm	2,200sqm
Community use (Class F1)		1,300sqm
Boathouse (sui generis)		380sqm
<b>Total</b>		<b>4,839sqm</b>

- 2.7 This Statement is only concerned with the assessment of the proposed flexible 'retail and leisure uses' namely Class E (shops, financial & professional services, restaurants/cafes) and sui generis (drinking establishments) uses and the cinema.
- 2.8 The proposed flexible retail and leisure uses will be distributed across the scheme however a significant proportion of these uses will be focused within a 'High Street Zone' which will provide a commercial core within the scheme (2,354sqm). Given the minimum cap on flexible office floorspace, other flexible uses will comprise a maximum of 2,839sqm floorspace.
- 2.9 As before, the Applicant is proposing a range of conditions to control the proposed floorspace. Importantly, such conditions need to provide a reasonable degree of flexibility to be attractive to future operators whilst providing the Council with certainty regarding the quantum, nature and format of the proposed flexible floorspace.
- 2.10 The proposed flexible floorspace is speculative in nature but the Applicant's plans for the redevelopment of the site are informed by demand expressed by potential operators.

- 2.11 The proposed retail and leisure offer is intended to be distinct but complementary to that of nearby town centres including East Sheen.
- 2.12 The proposed flexible retail and leisure uses will primarily fulfil the day to day needs of the future residents and working population of the proposed scheme as well as help 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 ‘employment generating’ uses consistent with the designation of the Application Site in the Local Plan. LBRuT has previously accepted the scheme ‘fit’ with the Local Plan vision for the redevelopment of the site including a desire to provide a new centre and village heart for Mortlake. In this respect, the proposed scheme has been designed to complement East Sheen, maximise the site’s riverside setting and re-connect the local area to the historic Mortlake High Street.
- 2.13 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.
- 2.14 It is inevitable that some visitors from a wider area will be drawn to the scheme given the site’s 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 thereby ensuring that the vitality and viability of East Sheen (and other centres) is protected.
- 2.15 This Statement tests the application proposals based on the maximum (worst case) permissible flexible floorspace parameters described below.
- 2.16 Up to 2,354sqm flexible use floorspace is proposed within a ‘High Street Zone’ 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 E(a) shops.
- 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, to provide strategically placed anchor units and 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.
- 2.18 The table below provides details regarding the location, types of uses and the amount of floorspace for the proposed flexible uses.

Building No.	Floor	Use	Floor Area (sqm GIA)
1	Ground	Café	122
2	Ground	Flexible	404
4	Ground + First	Flexible	472
5	Ground + Basement	Flexible inc. community use	1,187
6	Ground	Flexible	457
7	Ground	Flexible	617
8	Ground	Flexible	442
9	Ground	Flexible inc. boat house	347
10	Ground	Flexible inc. community use	97
11	Ground	Flexible	328
12	Ground	Flexible	367
<b>Total</b>			<b>4,839</b>

- 2.19 Having described the nature of the proposed flexible retail and leisure uses, the next section of this report considers the designation of the Application Site within the Development Plan.

### 3 SITE DESIGNATION

- 3.1 The LBRuT's Local Plan was adopted by the Council on 3<sup>rd</sup> July 2018. The Council adopted limited amendments to the Plan on 3<sup>rd</sup> March 2020.
- 3.2 On the Policies Map (2015) to the Local Plan, 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 is an 'edge of centre' location.
- 3.3 The Application Site falls within the 'Mortlake Area of Mixed Use'. The site is expected to provide a substantial mix of employment uses, including lower cost units suitable for small businesses, creative industries and scientific and technical businesses including green technology. Other 'employment generating' uses are also supported.
- 3.4 The Application Site is subject to a specific allocation in the Local Plan for comprehensive mixed use redevelopment. Policy SA24 confirms 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 reprovision 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 should contribute to creating an inviting and vibrant new centre..."*

- 3.5 The policy supports a 'new village heart and centre' for Mortlake including 'retail and other employment generating uses...and leisure uses'. The application proposals are consistent with the allocation of the site in the Local Plan.
- 3.6 The allocation is supported by an adopted Planning Brief (July 2011) which envisages a new 'village heart for Mortlake'. 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 "restaurant cafes and small retail spaces, community leisure uses" including a mix of retail and leisure uses (paragraph 1.5 refers).
- 3.7 Paragraph 5.14 of the Planning Brief refers to the retail offer as including small convenience shops and 'specialist' shops. These should be 'small scale' 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. The application proposals are consistent with this requirement, indeed previous proposals for the redevelopment of the site submitted by the Applicant have been determined to be compliant in this respect.

- 3.8 Neither the Local Plan designation 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.
- 3.9 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. The application proposals are fully consistent with these requirements.
- 3.10 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 'inviting and vibrant new centre'. [RPS Emphasis]
- 3.11 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.
- 3.12 In this case, the former Stag Brewery secures a specific designation for mixed use development within the adopted Local Plan. The allocation is supported by an adopted Planning Brief for the site. Furthermore, the Application Site 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. LBRuT and the Mayor have previously confirmed the scheme is consistent (in terms of retail and leisure policy considerations) with the designation of the site in the development plan.
- 3.13 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 support for 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.
- 3.14 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. The assessment of the previous scheme of redevelopment for the site submitted by the Applicant by the LBRuT and the Mayor demonstrates the acceptance that that scheme would not have a significant effect upon town centres. The current proposals are very comparable both in terms of their scale, nature and composition to the previous scheme. Furthermore, there have been no material changes in terms of retail and leisure policy which indicate a different conclusion should be reached.
- 3.15 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.
- 3.16 In summary, the proposed retail and leisure uses are consistent (like the previous proposals for the site as assessed by LBRuT and the Mayor) with the vision for the site as set out in the adopted and emerging Local Plan policy allocation 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.
- 3.17 Against this background, the proposals are not required to be tested in terms of the sequential and impact test prescribed by the NPPF. Nevertheless, to provide comfort regarding the scale and 'fit' of the proposals with the policy allocation vision subsequent sections of this Statement examine these policy tests.

## 4 RETAIL AND LEISURE POLICY

- 4.1 This section of the Statement provides an overview of relevant retail and leisure planning policy operating at 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 The statutory development plan comprises the Richmond upon Thames Local Plan March 2020 together with the London Plan March 2021. In addition, national planning policy is set out in the National Planning Policy Framework, the latest revisions to which were published by the Government in July 2021.
- 4.4 Significantly, retail and leisure policy has not materially changed since the consideration of the previous proposals for the site were assessed by LBRuT and the Mayor.

### Richmond Local Plan 2018 and 2020

- 4.5 The Local Plan contains several general policies applicable to proposals for retail and leisure uses.
- 4.6 Policy LP25 concerns 'Development in Centres'. The policy seeks to focus development within town centres, edge of centre locations and within Areas of Mixed Use. Outside these locations, development for main town centre uses is required to satisfy the Sequential Test (as set out in national policy). The policy also requires proposals more than 500sqm to be supported by a retail impact assessment.
- 4.7 Table 7.1.1 provides details of the Centre Hierarchy within the Borough. East Sheen is defined as a 'main centre' whereas Barnes, and Kew Gardens as 'local centres'. White Hart Lane is a 'neighbourhood centre'.
- 4.8 Table 7.1.7 sets out the Council's 'vision and approach' for its main centres. In respect of East Sheen this comprises:
- East Sheen is defined as a 'district' centre in the London Plan's network of town centres.
  - East Sheen is less accessible by public transport in comparison to Richmond and Twickenham; therefore, the centre is more suited to providing shops, services and employment opportunities for local communities.
  - The East Sheen Village Planning Guidance SPD was adopted in January 2016. The vision for East Sheen includes to:
    - retain the established character of the area;
    - improve the convenience of the shopping centre for the community including through its range of uses;
    - manage the impacts of the Upper Richmond Road West on the environment and its users wherever possible;
    - create a 'centre' for the village at Milestone Green;
    - utilise pavements to improve and enliven the street scene in parts of the Upper Richmond Road West; and
    - improve Mortlake Station.
  - The Spatial Strategy sets out the need to maintain and enhance, rather than significantly expand, East Sheen centre.
  - The Council seeks to maintain, and where appropriate enhance, East Sheen's role in providing office space for businesses. New office development is particularly encouraged in the designated Key Office Areas.

- The Spatial Strategy supports establishments, such as drinking establishments, that serve local needs and communities.

4.9 Table 7.1.13 similarly sets out the Council’s vision and approach for local centres, parades, Areas of mixed use. In relation to Mortlake Area of Mixed Use:

- the vision for Mortlake is based on the redevelopment of the Stag Brewery;
- provide improved functional and physical 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.

### The London Plan

4.10 The London Plan was published by the Mayor in March 2021. The London Plan contains several policies relevant to the consideration of retail and leisure uses. On adoption of the London Plan, the Mayor’s Town Centres SPG (July 2014) was revoked.

4.11 Policy SD6 concerns Town Centres and High Streets. 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 mixed-use or residential development that makes best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.”*

4.12 Policy SD8 sets out the Town Centre Network including the classification of centres. A list of designated town centres (District centre and above) is set out within Annex 2 of the London Plan.

4.13 Policy SD7, entitled ‘Town Centres: Development Principles and development plan documents’ relates to development within town centres. 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 Councils to identify suitable sites to accommodate new residential, retail and leisure development including edge of centre sites.

4.14 Part A2 requires; “require an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for retail, leisure and office uses that are not in accordance with the Development Plan. Applications that are likely to have a significant adverse impact should be refused”.

4.15 Part D 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 and B above, and is fit for purpose, with at least basic fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights*
- 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.”*

4.16 Policy E9 concerns ‘Retail, Markets and Hot Food Takeaways’. The policy, in so far as directly relevant to the application proposals 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

3) set out policies and site allocations to secure an appropriate mix of shops and other commercial units of different sizes, informed by local evidence and town centre strategies. Particular consideration should be given to the contribution large-scale commercial development proposals (containing over 2,500 sq.m. gross A Use Class floorspace) can make to the provision of small shops and other commercial units. Where justified by evidence of local need, policies should secure affordable commercial and shop units.

C Development Plans and development proposals should:

1) bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres

2) 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

3) 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...”

- 4.17 The London Plan is supported by a range of evidence base 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). Further commentary on the Mayor’s Consumer Expenditure and Comparison Goods Retail Floorspace Need is provided in the next section of this report.

### **National Planning Policy Framework**

- 4.18 The National Planning Policy Framework (NPPF) was first published in March 2012 and most recent revised by the Government in July 2021. Recent changes do not alter the Government’s policy relating to economic development, town centres or retail and leisure uses.

- 4.19 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

- 4.20 Paragraph 81 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.

- 4.21 The government’s policies relating to main town centre uses, including retail and leisure uses, are set out at paragraphs 86 - 91 of the NPPF.

- 4.22 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.

- 4.23 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.

- 4.24 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
- 4.25 As evidenced above, the Application Site is allocated in the Local Plan for a mix of uses. The application proposals accord with the allocation of the site and therefore there is 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, linkages and potential benefits for East Sheen town centre.
- 4.26 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.
- 4.27 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 'default' position), or any lower threshold set by an adopted Local Plan (in this case, 500sqm).
- 4.28 The allocation of the site in the Local Plan is silent regarding the quantum of retail and leisure floorspace that would be supported. The only reference is to 'appropriate' retail and leisure uses. Against this background and discussions with the Council's planning officers, the Applicant has agreed to prepare this Statement to explore the potential effects of the retail and leisure aspects of the proposed development.
- 4.29 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
- 4.30 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 2029. This is considered to be a robust assessment year for testing impact.
- 4.31 Finally, paragraph 91 states that "where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 90, it should be refused." This however needs to be weighed in the 'planning balance' 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)**

- 4.32 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. In relation to the two policy tests for retail and leisure development, the NPPG 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-009)*

- 4.33 With regard to the impact test, the NPPG notes that the purpose of the test is to consider the impact over time of certain out-of-centre and edge-of-centre proposals on town centre vitality and viability and investment (paragraph 2b-014).
- 4.34 It notes that the impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible (paragraph 2b-017). In this respect, the Council’s Retail Study 2014 and 2021 Update provides an up to date assessment of qualitative and quantitative issues and forms the basis of the impact assessment undertaken in this Statement.
- 4.35 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, consistent with previous proposals, the assessment of impact focuses upon East Sheen, Barnes, Kew Gardens and White Hart Lane centres. 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.
- 4.36 The Richmond Retail & Leisure Study together with the 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, August 2019 and January 2022. In addition, RPS has had regard to the latest London Town Centre Health Check Analysis 2017 prepared in support of the London Plan (published January 2018). The latter however only provides information in relation district and higher order centres.
- 4.37 Furthermore, paragraph 2b-015 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.”*
- 4.38 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
- 4.39 The Guidance provides a checklist of the steps that should be taken in applying the impact test, namely (paragraph 2b-018):
- 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 ‘no development’ 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

4.40 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.

4.41 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 Local Plan and the need for such assessments to be conducted in an 'appropriate and proportionate manner'.

### Summary

4.42 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.

4.43 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 sustainable communities and a vibrant scheme of development.

4.44 Set against the above policy background, the application proposals are not 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.

4.45 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.

4.46 The control mechanisms which the Applicant are 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.

## 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 to help 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 Retail and Leisure Needs Study Phase 1 Update July 2021
  - Richmond Town Centre Health Checks and Town Centre Land Use Survey (2013 – 2020)
  - 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 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.
- 5.6 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

- 5.7 The Richmond Retail Study 2014 Update provides a qualitative and quantitative assessment of the need for future retail and leisure floorspace within the Borough to 2029. The evidence underpins the retail and leisure strategy of the adopted Richmond Local Plan. 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 to provide an assessment of their vitality and viability. The Study was (in part) updated in July 2021.
- 5.8 The 2021 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 subdivided 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 5–10 minute drive time from the Application Site covering the north of the borough.
- 5.9 Comparison goods expenditure is forecast to increase from £804.54M in 2021 to £964.39M in 2029 i.e. an increase of £159.85M. 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).
- 5.10 The increase in expenditure within combined Zones 6 and 7 over the same period is forecast at £53.63M. However, the forecast in expenditure, after making deductions for the turnover of existing retail floorspace and commitments translates into a floorspace requirement of -4,184sqm gross by 2029 of which just -316sqm gross is attributed to East Sheen. This is a significant reduction compared to the findings of the 2014 Study but is explained mainly due to the temporary effects of the pandemic and reduced forecasts of expenditure growth over the short to medium term.

- 5.11 In relation to convenience goods, the Study indicates that convenience goods expenditure within the Borough will reduce from £520.90M in 2021 to £516.91M by 2029 due to applied growth rates being flat. On the basis of the adopted forecasts, there is no requirement for significant new convenience goods floorspace within the borough.
- 5.12 Finally, in relation to food and drink expenditure, this is expected to increase from £357.57M in 2021 to £483.07M in 2029 i.e. an increase of £125.5M of which £42.9M is accounted for by increases in expenditure within zones 6 and 7. Significantly Zone 7 has the second highest expenditure per head on food and drink of the entire Borough. In contrast, the floorspace requirement is for just 191sqm gross by 2029 across the Borough of which 141sqm gross is identified for East Sheen and 165sqm gross for Barnes.
- 5.13 Again, these forecasts are substantially less than those identified by the Council’s 2014 Study. The forecasts for comparison and convenience goods floorspace over the plan period are based upon combined anticipated rates of growth in expenditure and population. As the Study author notes these floorspace projections are a guide and should not be applied rigidly (paragraph 6.16):
- “The floorspace projections should not be adopted as rigid targets or maximum or minimum requirements but viewed as broad guidance. The floorspace projections in this report provide a starting point for the review of site-specific allocations and development management policies.”
- 5.14 Such high level borough wide forecasts tend to ignore cases of local need, for example arising through identified deficiencies of provision (including redistribution), qualitative issues or major schemes of development that are not identified as retail commitments.
- 5.15 The 2021 Study provides little commentary on the quality and distribution of retail facilities within the Borough. A qualitative assessment will be included as part of a Phase 2 study to be published later in 2022.
- 5.16 The assessment contained within the 2014 Study is dated, although supplemented by more regular and focused surveys of town centres by LBRuT, the most recent of which was undertaken in 2020 to primarily monitor vacancy rates across its centres. The table below provides an indication of the broad mix of uses across the four centres relevant to the consideration of the application proposals.

Centre	Total retail service units	Comparison goods retail	Convenience goods retail	Food/beverage	Non-retail services	Vacant units
East Sheen	260	93	28	43	71	25
Barnes	116	39	16	21	29	11
Kew Gardens	43	11	6	14	10	2
White Hart Lane	45	11	5	10	16	3

Source: Table 3.2 – LBRuT’s designed centres – Humber of outlets by use (Richmond Upon Thames Retail & Leisure Needs Study Phase 1 Update 2021)

- 5.17 In relation to East Sheen, paragraph 7.23 of the 2014 Study notes that after applying an assumption regarding the take up of vacant floorspace, a potential 300sqm gross of former Class A1 – A5 floorspace (shops, cafes, restaurants, drinking establishments etc) 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.”*
- 5.18 The 2014 audit of East Sheen 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 remain reflective of the centre today, as confirmed by the RPS survey of the centre conducted in January 2022.
- 5.19 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. 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 as evidenced by RPS in January 2022.

- 5.20 In relation to the 'need' or requirement for additional cinema screens to serve the Borough, the 2021 Study notes (Paragraph 5.14):
- "5.14 Adopting the national average population per cinema screen (40,000 trips per screen), implies that 519,000 cinema trips generates demand for 13 cinema screens. In terms of seats, the national average (220 trips per seat) suggests 519,000 trips could support 2,359 seats. These projections suggest a current under-supply of 3 screens or 1,008 seats. Population within LBRuT is projected to increase to 205,200 by 2039, generating 533,000 cinema trips in total. These projections suggest a future under-supply of 1,071 seats at 2039.
- 5.21 In summary, the above commentary indicates that there is expected to be limited 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. For the reasons set out, the assessment is likely to ignore specific local needs, including needs associated with redevelopment of the Application Site as supported by the Local Plan.
- 5.22 The next section of this report records the RPS survey findings in relation to local retail and leisure facilities including those located within town centres proximate to the Application Site.

## 6 LOCAL RETAIL AND LEISURE PROVISION

- 6.1 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)
- 6.2 RPS undertook surveys of these centres in July 2017, August 2019 and most recently in January 2022.
- 6.3 Our latest findings endorse the broad conclusions reached by our previous surveys of these centres. The surveys inform our assessment of the vitality and viability of each centre against which we judge the potential effects of the proposed development. Accordingly, the conclusions reached by the RPS Retail and Leisure Statement (February 2018 – Revised 27<sup>th</sup> September 2019), submitted in support of the previous proposals for the redevelopment of the site, remain valid.
- 6.4 Our survey of the various centres demonstrates that there have been very few changes. Importantly centres remain vibrant and viable and continue to perform their designated role and function within the hierarchy.
- 6.5 The proposed flexible retail and leisure uses will primarily serve the day to day needs of the future residents of the scheme. These uses 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 understand the type, nature and distribution of existing retail and leisure facilities within the local area. The following paragraphs provide a summary of that provision.
- 6.6 The RPS surveys together with the LBRuT and Mayor retail and leisure evidence base described earlier inform our assessment of each centre's vitality and viability consistent with the methodology set out within the NPPG regarding the assessment of 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.
- 6.7 East Sheen is the largest centre within the adopted study area and is the most proximate 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 several 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 and terminates at Mortlake railway station within 160 metres of the Application Site.
- 6.8 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 retailers 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. 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.

- 6.9 Kew Gardens local centre is located to the west of the Application Site. It is a compact centre focused around the station with the main 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 is currently just one vacant unit. A clear indication of its popularity and strength. The centre is healthy and distinct from the proposed retail and leisure offer of the application proposals.
- 6.10 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 (Sainsbury's 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 is just one vacant unit at present. The various indicators point to the centre being healthy.
- 6.11 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, Superdrug, W H Smith, Robert Dyas, Caffe Nero, HSBC, Pizza Express
Barnes	Sainsbury's Local, Caffe Nero, Londis, Starbucks, Marks & Spencer Food
Kew Gardens Station	Tesco Express, Pizza Express, Starbucks
White Hart Lane	Sainsbury's Local

Source: RPS Survey January 2022

- 6.12 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, T Swatland Butcher, Just Write (stationery), Pandemonium (toys), Pearson (cycles), Sheen Sports Goods, R Chubb & Son Butcher
Barnes	Pets Corner, Cook (delicatessen), Two Peas in a Pod (green grocer), Nina (women's wear), SW Ski (Ski wear), Lea & Sandeman (wine merchant), Barnes Jewellers, Blue Lavender (florist), Barnes Bookstore, Barnes Fine Art Gallery, Forward Pharmacy, Editor @ 37 (clothes), Barnes Pantry, Georgina Skan (Jewellers)
Kew Gardens Station	The Good Wine Shop, Oliver's Wholefood Store, The Kew Bookshop, Pether (butchers), Kew Gardner (flowers), Mia Wood (Women's clothing), Nicolas
White Hart Lane	The Waggers (Dog grooming), Taylor & Marr (furniture), JK (furniture), Flower Room, Boecho Gallery, Henry Moore Upholstery, White Hart Express, Bazar (clothing)

Source: RPS Survey January 2022

- 6.13 A significant number of the national multiple retailers identified are leisure operators such as cafes and restaurants. 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 food and beverage and leisure offer
East Sheen	Bistro Corner, Metos Coffee House, Euro Café, Sheen Fish Bar, The Robin Cafe, Forty Four Sheen Lane, La Plata Steakhouse, Pig & Whistle PH, Boutique Café, Black Salt, Kurck, Lal Bagh, Onigiri, Z-One Chinese Express, Faanoos Restaurant, Oliveira Kitchen, Leonardo Wine Bar, Café Al Fresco, Mamma Mia, Grilandia, Sunnisa Thai, Papa John's Pizza, Ganum Persian Restaurant, Harris & Hoole, Artisan Coffee, Caffe Nero, Pasticceria Leonardo, Neeman Persian Café, Sams Chicken, The Hare & Hounds PH, Valentina, 11 Coffee & Co Sheen, Lupo Bros, Pizza Express, Upper Rich Café, Dominos Pizza, Sheen Spice, Pickle and Rye, Kosy Coffee & Food, Asiatique, Annapurna

Barnes	Olympic Studio Cinema and Cafe, The Waterman’s Arms PH, Bulls Head PH, Coach & Horse PH, Boathouse Café, Arte Chef, Awesome Thai, Cote, Pizza Express, Caffe Nero, The Sun Inn PH, Otoro, The Common Room, The Red Lion, Starbucks, Alma Café, Riva
Kew Garden Station	Cafe Torelli, Pizza Express, Antipodea, Ma Cuisine, Tap on the Line, The Glasshouse, Kew Green House, Starbucks, Autrobus & Butler, Kew Gardens Oriental, Café Yukari, Pagoda, Café Torelli II Piccolo, Kew Fish Bar
White Hart Lane	Dolce Crema, Orange Pekoe, Hawei, Café 66, The Crossing Pub, No 40 Café, Camile Thai, Chakra, The White Hart, Café Loris, Rick Stein Barnes,

Source: RPS Survey January 2022

6.14 The table below provides a comparison of the number of vacant units within each of the centres.

Centre	Number of Vacant Units			
	July 2017 <sup>(1)</sup>	August 2019 <sup>(1)</sup>	August 2020 <sup>(2)</sup>	January 2022 <sup>(1)</sup>
East Sheen	17	16	29	14
Barnes	10	3	11	9
Kew Gardens	0	0	2	1
White Hart Lane	3	0	4	1

Notes: (1) RPS survey (all frontages), (2) LBRuT Survey (all frontages)

6.15 As can be seen above, the level of vacant units identified over the period 2017 - 2022 is comparable, albeit there has been an improvement in the vacancy rate generally. These levels of vacancy should give no cause for any concern. The table includes survey data from the LBRuT Town Centre Land Use Survey 2020 which notably records a significantly higher number of vacant units at the time of the survey for East Sheen.

6.16 The vacant units comprise a variety of different premises. 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.

6.17 The largest vacant units within East Sheen were identified as the former The Party Palace, 487 – 493 Upper Richmond Road West at 138sqm and 341 Upper Richmond Road West (141sqm). Similarly, the former bank premises at 3 Barnes High Street was the largest vacant unit within Barnes (65sqm). There was only one vacant unit in Kew Gardens Station (112 North Road, 40sqm) and White Hart Lane (74 White Hart Lane, 40sqm).

6.18 It is of course important to recognise that these 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. The latest survey is representative of the underlying vacancy rate for each centre over the past 5 years.

6.19 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).

6.20 The Barnes cinema is operated by Olympic Studios. It is a 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.

6.21 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 range of food and beverage outlets located nearby.

6.22 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 in close proximity to a wide ranging food and beverage offer including Costa Coffee, Bill’s and Nandos. 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.

6.23 The table below summaries the local cinema provision.

Cinema	No Screens	No. Seats	Type
Barnes Olympic Studios	2	201	Luxury/Boutique
Odeon Putney	3	585	Mainstream
Odeon Richmond	7	1,006	Mainstream
Curzon Richmond	1	144	Boutique

- 6.24 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, Sports Direct and Next. There is also a large Sainsbury’s 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.
- 6.25 In summary, our assessment of the four centres indicates, despite the recent effects of the pandemic, each are healthy with good signs of vitality. Each centre performs its designated role and function within the centre hierarchy. In all cases the level of vacant units is low and 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.
- 6.26 All of the centres include a diverse range of retail, leisure and service 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.
- 6.27 Section 8 of this Statement considers the potential effect of the proposed flexible retail and leisure floorspace upon these centres having regard to the above assessment of vitality and viability and the retail and leisure evidence which underpins the development plan.
- 6.28 The next section of this Statement examines the proposals specifically in terms of the sequential test.

## 7 SEQUENTIAL TEST

- 7.1 The purpose of the sequential test is to direct new retail and leisure uses to town centres to support their vitality and viability.
- 7.2 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. The Application Site is one such example, promoted through the Local Plan.
- 7.3 The NPPF only requires proposals for retail and leisure uses to be assessed in terms of the sequential approach where they 1) are located outside a town centre or 2) do not accord with an up to date local plan.
- 7.4 In this case, 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. Significantly, the site is specifically allocated in the Local Plan as a development opportunity for a mix of uses to provide a new centre and heart to Mortlake Village, where appropriate retail and leisure uses are supported. 'Appropriate' is not defined however, the scale of retail and leisure proposals is required to support vibrancy and vitality and not harm other town centres. The Council's vision for the site is further set out within an adopted Development Brief.
- 7.5 The impact test is key to demonstrating the appropriateness of the nature and scale of 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.
- 7.6 Locating the proposed retail and leisure uses elsewhere is not an option. The range and mix of uses are essential to the Application Site's development as a sustainable new community.
- 7.7 The proposed flexible retail and leisure floorspace remains of a similar scale and nature to the previous proposals for the Application Site. LBRuT and Mayor's assessment of the previous proposals for the redevelopment of the site concluded that the proposals were appropriate in scale and consistent with the allocation of the site for mixed uses in the Local Plan. For the reasons previously advanced in this Statement, there is no requirement to test the application proposals in terms of the sequential test.
- 7.8 Significantly, the level of vacant floorspace within nearby local town centres has remained static and, in some cases, improved in recent years. The overall amount and type of vacant floorspace is not suitable to accommodate the application proposals. Similarly, there are no other sites within East Sheen or indeed the smaller centres which are suitable and available to accommodate the proposals for the Application Site.
- 7.9 The NPPG advises that the sequential test should be proportionate and appropriate for the given proposal and applied according to the market requirements. 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.
- 7.10 Even if the sequential test were to apply, there is no requirement to consider the 'disaggregation' of the proposed scheme. 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)
- 7.11 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.

- 7.12 Having regard to the above, as evidenced in the previous section of this Statement, the availability of vacant premises within nearby town centres is very limited and dispersed and could not accommodate the entirety of the proposed retail and leisure floorspace even when applying the necessary flexibility. The scale of development is unsuitable for the smaller centres examined.
- 7.13 The range of retail and leisure uses proposed are needed to comply with policy and 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.
- 7.14 The proposed retail and leisure uses are configured to provide a range of active frontages 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.
- 7.15 Against this policy background, the proposed flexible retail and leisure uses form an integral and important part of the overall scheme and comply with the allocation of the site and are therefore not required to be assessed against the sequential test.
- 7.16 The safeguards proposed by the Applicant in terms of limiting the amount, type and nature of the retail and leisure floorspace will ensure that the floorspace remains appropriate i.e. it primarily serves a local need and complements the retail and leisure offer of nearby centres including East Sheen district centre.
- 7.17 The quantum and type of retail and leisure floorspace is both appropriate and necessary and the floorspace cannot be disaggregated.
- 7.18 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.
- 7.19 In conclusion, the Application Site is allocated for mixed use development in the Local Plan. Provided that the scale and nature of the proposed flexible retail and leisure floorspace is 'appropriate' then the proposals will be policy compliant, and the sequential test satisfied.
- 7.20 The next section of this Statement provides an assessment of impact which confirms the appropriateness of the proposed retail and leisure floorspace. Nevertheless, it is very significant in this case that these latest proposals are similar in terms of both the nature and quantum of retail and leisure floorspace to those previously assessed by LBRuT and the Mayor who raised no cause for concern in terms of the impact and sequential tests.

## 8 IMPACT ASSESSMENT

- 8.1 Despite the pandemic, indicators of vitality and viability point to local town centres remaining healthy. Indeed, there is evidence that suburban local town centres and parades benefitted during the pandemic, often at the expense of larger centres, as people shopped more locally supporting local businesses close to where they live. This has had a positive and beneficial effect, including low vacancy levels, notwithstanding many shops and services uses were at some point forced to close during 2020-2021 due to imposed national lockdowns.
- 8.2 The latest proposals for the redevelopment of the Application Site, in terms of the retail and leisure component, remain very similar both in nature and scale to the previous proposals. There is a proposed reduction of 184sqm GIA flexible floorspace compared to the previous scheme of redevelopment (from 5,023sqm to 4,839sqm). The maximum floorspace caps in respect of individual uses remain the same as the Refused Scheme (as described in Section 2 of this Statement).
- 8.3 Significantly, the previous scheme was supported by LBRuT and the Mayor in terms of its compliance with retail and leisure planning policy tests. Since when there have been no material changes in circumstances which dictate a different outcome (e.g. direction of policy changes, decline in the health of local town centres etc). Accordingly, the previous conclusions on retail and leisure matters should be directly transferrable to the current proposals.
- 8.4 In this respect, 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.
- 8.5 The scheme proposes up to 1,085 new residential units, with a residential population of 2,472. The associated increased residential population of the scheme will generate significant additional local expenditure. This is capable of supporting the entire turnover of the retail and leisure floorspace as a well as benefitting shops and services within nearby town centres, such as East Sheen. Consistent with previous proposals to develop the site, the proposed leisure and retail uses are designed to complement the role and function of East Sheen.
- 8.6 The proposals would not jeopardise investment in town centres, on the contrary they will directly benefit East Sheen. Local town centres are healthy and vibrant and have a good mix and diverse range of uses and activities with low vacancy levels. The centres are well placed to withstand any theoretical levels of trade diversion. Furthermore, the forecast growth in expenditure generally will mean any perceived impacts will be very short lived and that the spending power of the residential population of the scheme will benefit local town centres.
- 8.7 This section of the Statement assesses the potential effects of the retail and leisure elements of the application proposals having regard to the maximum amount of floorspace permissible, as proposed to be controlled by the Applicant, namely:
- 2,200sqm Shops
  - 2,400sqm Cafes/Restaurants
  - 1,800sqm Drinking Establishments
  - A cinema
- 8.8 An overall cap on the amount of flexible floorspace is proposed at 4,839sqm GIA (to include a minimum 2,000sqm office floorspace). 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 flexibility.
- 8.9 The proposed shops are perhaps the most sensitive of the proposed retail and leisure uses. Accordingly, the assessment set out below assumes the maximum 2,200sqm Class E (shops) floorspace will be provided. The balance of the floorspace is assumed to be entirely for restaurants/cafes/drinking establishments (i.e. up to 639sqm). This is a robust basis upon which to test the proposed retail and leisure uses. In reality, the amount of shops and café/restaurants will be less.

- 8.10 The above scenario takes no account of the potential for the flexible floorspace to include community uses Class F1 (up to 1,300sqm), a boathouse (up to 380sqm) and financial and professional services (up to 220sqm). These uses total 1,900sqm GIA floorspace. The realisation of at least some of these uses would significantly reduce the amount of floorspace given over to shops and café/restaurant uses. Consequently, whilst the assessment is undertaken on robust basis, in reality any effects (impacts) will be considerably over stated given the need to provide for a mix of different uses (as required by the controls proposed by the Applicant). 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.
- 8.11 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. 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.
- 8.12 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 Local Plan sets a lower threshold of 500sqm. For the reasons previously set out, the proposals comply with the allocation of the site in the Local Plan. The allocation provides clear policy support for retail and leisure uses including an aspiration to 'create a new centre and heart for Mortlake Village'.
- 8.13 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.
- 8.14 For the reasons already discussed, the local policy designation of the Application Site is silent upon the 'appropriate' quantum of retail and leisure floorspace that may be acceptable. The Council's 2014 Retail Study specifically identifies the Application Site as a development opportunity which is capable of meeting the general need for new shops, restaurants and cafes.
- 8.15 'Appropriate' retail and leisure uses are defined by the policy allocation of the Application Site in the following 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
- 8.16 The proposed retail and leisure uses have specifically been designed having full regard to these policy requirements.
- 8.17 Notwithstanding the allocation of the Application Site, like the previous proposals for the 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 in 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.
- 8.18 There are no planned or committed schemes of development within nearby local centres which would be harmed by the application proposals.
- 8.19 The assessment examines, for the purposes of the applying the impact test, a 'design year' for the scheme of 2029. This is broadly consistent with the anticipated build programme but also presents a robust point at which to test impact having regard to potential effects of the global pandemic on growth rates. The design year also correlates well with the available data contained within the Council's latest retail and leisure evidence base in respect of population and expenditure projections.

2029 provides a robust assessment year in order to determine whether the proposals would have any significant adverse effects.

8.20 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)

8.21 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.

8.22 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.

8.23 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 proposed 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.

8.24 To provide a new centre for Mortlake it is necessary to ensure a certain quantum and mix of retail and leisure floorspace to provide the necessary attraction and commercial 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 riverside setting and proximity and linkages with nearby town centres.

8.25 The scheme will generate a significant number of new employment opportunities. The scheme will also result in a substantial new residential population (up to 2,472). 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.

### **Proposed Flexible Retail and Leisure Uses**

8.26 The proposed flexible retail and leisure uses comprise up to 2,839sqm floorspace including shops, restaurants/cafes and drinking establishments. These uses will be predominately located at ground floor level of buildings. 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.

8.27 Putting the application proposals into context, East Sheen town centre comprises circa 34,900sqm gross Class E floorspace (RBRuT Town Centre Health Check 2013, Table 54). On this basis the proposed flexible retail and leisure floorspace (maximum 2,839sqm) the proposals represent (at most) 8% 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.

8.28 The proposed flexible retail and leisure floorspace (maximum 2,839sqm 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 E shops within the proposed High Street Zone.

8.29 In order to ensure a range and mix of uses, the Applicant is proposing to limit the amount of floorspace to 2,200sqm for Class E shops, up to 2,400sqm for Class E cafes/restaurant uses and up to 1,800sqm for drinking establishments thereby ensuring the overall quantum and type of floorspace is not dominated by a single use or occupier.

8.30 It is clear that the nature of the proposed 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 levels of vacancy. They are healthy and would not be subject to any significant adverse effects.

- 8.31 The proposed flexible retail and leisure floorspace (up to 2,839sqm) is clearly ancillary to and supports the main use of the proposed development for residential purposes. The floorspace comprises circa 1.5% 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.

**Quantitative Assessment**

- 8.32 The Council’s Retail and Leisure Needs Study Phase 1 Update 2021 provides the latest estimates of population and expenditure growth for the period 2021 – 2039 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**

- 8.33 The table below provides a summary of expenditure estimates for retail (convenience and comparison goods) and food and beverage (cafes, restaurants, drinking establishments) in zone 7.

Year	Expenditure Type (£ per person)		
	Convenience	Comparison	Food & Beverage
2021	2,763	4,322	2,032
2024	2,751	4,626	2,470
2029	2,736	5,169	2,739

Richmond Retail and Leisure Needs Study Phase 1 Update 2021 (Table 2 - Appendix 1, 2 and 3)

- 8.34 As can be seen, expenditure per head is forecast to increase for comparison and food and beverage over the period 2021 – 2029, with a decline in convenience goods expenditure over the same period. Notably, zone 7 has the highest expenditure per head of any zone for comparison goods, second highest for food and beverage expenditure and the third highest for convenience goods.

- 8.35 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
2021	90.20	141.08	66.31	297.59
2024	89.66	150.74	80.48	320.88
2029	91.81	173.43	91.91	357.15
2021 - 2029	1.61	32.35	25.6	59.56

Richmond Retail and Leisure Needs Study Phase 1 Update 2021 (Table 3 - Appendix 1, 2 and 3)

- 8.36 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
2021	57.04	49.13	31.39	137.56
2024	56.30	52.30	37.95	146.55
2029	57.00	59.84	43.17	160.01

Richmond Retail and Leisure Needs Study Phase 1 Update 2021 (Tables 5, 6, 7 - Appendix 1, 2 and 3)

- 8.37 As can be seen the turnover of East Sheen is expected to grow over the period 2021 – 2029 by £22.45M to £160.01M in 2029. As identified below, this is significantly in excess of the assessed potential turnover of the application proposals (£14.4M in 2029). As the previous sections of this Statement identify, despite effects of Covid-19 restrictions, East Sheen is a healthy centre. 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 2021 ‘healthy’ level 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.

- 8.38 Given their limited local attraction, comparable estimates for Kew Gardens Station and White Hart Lane are not provided.
- 8.39 In relation to Barnes, food and beverage expenditure within the centre is estimated at £31.39M in 2021, rising to £34.64M in 2024 and £39.51M by 2029 (Tables 5, 6 & 7, Appendix 3) demonstrating that the turnover of Barnes (food and beverage use) is 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. No estimates of comparison and convenience goods turnover are provided indicating the very local catchment of the centre for these types of goods.
- 8.40 In summary, any effects arising from the application proposals in terms of the retail and leisure uses 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, the most proximate and largest centre.

**Spending Potential of the Proposed Future Residents of the Scheme**

- 8.1.1 The proposed scheme includes the provision of up to 1,085 residential units. These have the potential to generate a population of up to 2,472 people by 2029 (based upon information set out within the submitted Environmental Statement).
- 8.1.2 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.
- 8.1.3 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 additional 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 (2029).

Expenditure Type	2029 Expenditure per Head £	Population	Total Expenditure £M
Comparison	5,169	2,472	12.78
Convenience	2,736	2,472	6.76
Food & Beverage	2,739	2,472	6.77
<b>Total</b>	-	-	<b>26.31</b>

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

- 8.41 As can be seen there is a significant expenditure associated with the population of the scheme (£26.31M in 2029). For the reasons previously advanced, this is likely to be a conservative estimate given subdued growth rates adopted by the Study reflecting the effects of the pandemic, inflation, and Brexit. Not all of this expenditure will be spent in the shops and leisure facilities of the scheme. Even so, this expenditure is significant and means that the ‘net’ draw of the scheme upon expenditure and existing retail and leisure facilities will be reduced. In addition, there will be expenditure associated with the working population of the scheme (this has not been assessed).

**Estimated Turnover Potential of Proposed Retail and Leisure Floorspace**

- 8.42 The proposed retail and leisure 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.
- 8.43 Based upon a maximum floorspace of 2,839sqm for flexible retail and leisure uses, the table below provides a breakdown of the floorspace by type of use for the purposes of calculating the potential turnover of the proposed floorspace.
- 8.44 Given the speculative nature of the proposed retail and leisure uses, RPS has made a number of assumptions regarding the future composition of the floorspace, including the proportion of shops to food and beverage uses and the split between convenience and comparison goods. Given the

location it is expected that a greater amount of the proposed shop floorspace will be given over to the sale of convenience goods (60%), reflecting local needs.

Floorspace Type	Floorspace sqm		
	Gross	Sales Area	% of Total
Comparison (40% of Class E(a))	880sqm	660sqm	33.6%
Convenience (60% of Class E(a))	1,320sqm	858sqm	43.7%
Food & Beverage	639sqm	447sqm	22.7%
<b>Total</b>	<b>2,839sqm</b>	<b>1,965sqm</b>	<b>100%</b>

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

8.45 Based upon the above assumptions, the proposed scheme will comprise a retail and food and beverage sales area of 1,965sqm which is 70% of the overall gross floorspace (2,839sqm).

8.46 The table below calculates the potential turnover of the proposed retail and leisure floorspace having regard to the average sales densities adopted by the Richmond Retail & Leisure Needs Study 2021. The Study however is conducted on the basis of sales densities which RPS considers would only be achieved by the largest centres. Consistent with our previous assumptions, RPS has 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 2029	Sales area sqm	Turnover £M
Comparison	£6,500	660	4.29
Convenience	£8,500	858	7.29
Food & Beverage	£6,200	447	2.77
<b>Total</b>	-	<b>1,965</b>	<b>14.35</b>

Notes: Sales densities have regard to the Richmond Retail Study but adjusted to reflect location and type of retail offer being outside town centres as per previous RPS assessments.

8.47 As can be seen, the potential turnover of the retail and leisure floorspace (assessed on the robust basis outlined above) would be circa £14.4M in 2029. This compares to the total expenditure generated by the proposed residential population of the scheme £26.3M. Consequently, the proposed development will have no draw upon the growth in available expenditure (within zone 7 this is forecast as £59.56M between 2021 and 2029). Theoretically the turnover of the scheme could be entirely supported by the expenditure generated by the new residential population with surplus expenditure capable of benefitting nearby town centres.

8.48 As previously stated, 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 turnover of the retail and leisure uses account for just 54.5% of the expenditure generated by the future residents of the scheme. This points to the ‘appropriateness’ of the proposed retail and leisure provision.

8.49 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 residents’ expenditure would be spent in this way, say 15% (£3.95M) of expenditure meaning that the balance (85%, £22.36M) would be spent elsewhere including in shops and leisure facilities located in nearby local centres such as East Sheen.

8.50 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 very limited and given the difference in the retail offer between East Sheen and the application proposals impacts would not be significantly adverse.

8.51 Furthermore, town centres would benefit by securing a share of the growth in forecast expenditure meaning they will become more resilient, maintaining their market share, and able to withstand any potential effects from competing development.

8.52 The Council’s Retail & Leisure Study 2021 assesses the growth in expenditure within the study area and the potential future retail and leisure floorspace requirement. This assessment 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 (maintaining its 'market share').

- 8.53 Furthermore, given the riverside setting of the development, it would not be unreasonable to assume that 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 further reduce the net draw of the proposals upon local expenditure.
- 8.54 In addition to East Sheen, some trade may theoretically be diverted from other retail and leisure facilities including those located within other nearby centres. For example, the food and beverage offer of Barnes local centre. In relation to Barnes, the food and beverage offer is strong and estimated to have a turnover of £39.51M in 2029 compared to the assessed potential turnover of the proposed food and beverage offer of the proposed scheme (£2.77M). Again, it is clear that the proposed scale of the food and beverage offer planned for the Application Site is appropriate and would not compete with or cause significant adverse effects on Barnes town centre.
- 8.55 As the scheme is speculative, it is quite possible that a reduced proportion of the overall flexible use space would be put to a shop, café, restaurant use, meaning that the turnover of the proposals would reduce and any impact would be overstated. Even so, having regard to the above analysis, the levels of impact predicted (based upon a robust basis whereby trade is solely derived from East Sheen) are negligible and not significantly adverse.

### **Summary**

- 8.56 In summary, the proposed retail and leisure floorspace 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.
- 8.57 Local town centres have been assessed as healthy. They are popular with local residents and provide a range and mix of shops, leisure and other service uses. The proposed flexible retail and leisure floorspace will complement these centres.
- 8.58 The proposed flexible retail and leisure uses are of an appropriate scale and type and would not have a significant adverse effect upon local town centres. Significantly, the proposed flexible retail and leisure floorspace is supported by the new residential population planned for the Application Site. This means, in theory, that no expenditure would be diverted from other retail facilities and/or those facilities would themselves benefit from additional expenditure. Under such a scenario the impact upon local town centres would be negligible and not significantly adverse.

### **Cinema Assessment**

- 8.59 Excluding the period of the pandemic, 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.
- 8.60 There has been significant growth in the provision of new cinemas. This has been fuelled by a general increase in the number of Hollywood 'blockbusters' and new developments in cinema technology. This has resulted in the development of large modern multiplex 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.
- 8.61 Cinemas are often developed as part of wider retail and leisure schemes including a range of restaurants where the benefits of grouped provision can be secured. Customers 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. Cinema admissions are highly dependent and fluctuate by the number of high quality of blockbuster films released at any given time.

- 8.62 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.
- 8.63 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.
- 8.64 In contrast to retail planning, there is no defined methodology for assessing cinemas. The NPPG is silent upon the assessment of cinemas. 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). A consensus approach is to examine participation rates using national average visitation data derived from published sources of information.
- 8.65 The Richmond Retail and Leisure Needs Study 2021 update includes an assessment of cinema need.
- 8.66 Paragraph 5.9 provides the following commentary on cinema visitation:  
“Cinema admissions in the UK declined steadily during the 1950s, 1960s and 1970s, a period when the ownership of televisions increased significantly. Cinema admissions continued to decline in the early 1980s but increased steadily after 1984 up to 2002. There was a peak in cinema admissions in 2002 at 175.9 million. Total admissions reduced to 157.5 million in 2014 but increased slowly to 176 million in 2019 (Source: British Film Institute). Cinema trips have not increased significantly since 2002, despite population growth of 9.6% during this period (59.4 million to 66.6 million). The national average visitation rate is about 2.6 trips per person per annum. The number of trips during the on-going Covid-19 crisis will have reduced significantly. This cinema assessment assumes trip levels will return to pre-Covid levels in the future.”
- 8.67 The Study records existing cinema provision within the Borough comprises a total of 10 screens with 1,351 seats, namely:
- Curzon, Water Lane, Richmond (1 screen / 144 seats)
  - Odeon, Hill Street, Richmond (7 screens / 1,006 seats)
  - Olympic Studios, Barnes (2 screens / 201 seats)
- 8.68 The Study confirms (paragraph 5.12) that:  
“The population within LBRuT is 199,630 in 2021 which would generate around 519,000 cinema trips per annum, based on the national average visitation rate (2.6 trips per annum).”
- 8.69 Furthermore, paragraph 5.13 continues by stating:  
“Experian’s local expenditure data indicates LBRuT generates £10.75 million on cinema trips. This expenditure estimate appears to be higher than 519,000 cinema trips estimated above i.e. it implies an average of over £20 per person each trip. This figure suggests the cinema visitation rate in LBRuT is higher than the national average (2.6 trips per annum per person).”
- 8.70 The Study indicates a need for an additional 3 screen cinema within the Borough at paragraph 5.14, namely:  
“Adopting the national average population per cinema screen (40,000 trips per screen), implies that 519,000 cinema trips generates demand for 13 cinema screens. In terms of seats, the national average (220 trips per seat) suggests 519,000 trips could support 2,359 seats. These projections suggest a current under-supply of 3 screens or 1,008 seats. Population within LBRuT is projected to increase to 205,200 by 2039, generating 533,000 cinema trips in total. These projections suggest a future under-supply of 1,071 seats at 2039.”
- 8.71 The proposed cinema is therefore very comparable in terms of the identified ‘need’ for an additional cinema in the Borough, based upon national average visitation.

- 8.72 The cinema will be of a boutique format rather than a 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.
- 8.73 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 fully reflect the potential demand for a new cinema facility within the study area.
- 8.74 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.
- 8.75 Cinema revenue is driven in part through food and beverage 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.
- 8.76 The Independent Cinema Office (ICO) provides commentary and guidance on establishing catchment areas and confirms that the most common way of defining a cinema's 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.
- 8.77 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 'need' test as a standalone test for assessing development 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.
- 8.78 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.

- 8.79 As previously discussed, the leisure component of the scheme (cinema, food and beverage 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. Cinemas rely upon revenues generated from the sale of food and drink as part of the overall visitor experience.
- 8.80 The proposed cinema will help to meet a growing need for additional screens in the area in accordance with the trend for increased visitation and regard to the number of screens per population.
- 8.81 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).
- 8.82 The review of cinema 'need' set out above demonstrates that there is a requirement for at least 3 additional screens within the Borough. There is support for a cinema to form part of the proposed development as it would add to the range and mix of uses and contribute to the night time economy as confirmed by the LBRuT and the Mayor's assessment of the previous proposals to redevelop the Application Site. The provision of a cinema as part of the application proposals will not have a significant adverse effect upon existing local cinemas or indeed the vitality and viability of local town centres.

### **Conclusion**

- 8.83 In summary, the proposed retail and leisure uses will not have a significant adverse 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.
- 8.84 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 This Statement reaches the following conclusions:

- 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, cycling and walking with good potential to facilitate linked trips with East Sheen
- The proposed retail and leisure uses 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.
- There are no sequentially preferable sites, suitable and available to accommodate the application proposals.
- 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 proposed retail and leisure uses are entirely appropriate and accord with the policy allocation of the site in the Local Plan and the Development Plan generally.
- The proposals fully accord with the allocation of the site in the Local Plan for mixed use development including a new centre
- The proposed cinema will contribute to the vibrant mix of uses proposed for the Application Site. It will help to enhance the local evening economy with the potential to provide benefits to existing nearby businesses
- The expenditure derived from the scheme's residential population will directly benefit local shops and services including those in nearby local town centres.
- Levels of predicted impact are negligible and will not result in significant adverse harm.
- The assessment undertaken by LBRuT and the Mayor in respect of the previous proposals to develop the Application Site remain valid and directly transferrable to these latest proposals, namely that there should be no objection from a retail and leisure policy perspective.

9.2 In summary, this Statement concludes that there are no reasons in terms of retail and leisure planning policy to resist the grant of planning permission for the application proposals.