

The impact of the introduction of the permitted development right for change from A1 to A2

Planning

1 January 2016

The impact of the introduction of the permitted development right for change of use from A1 (shop) to A2 (financial services) in Richmond upon Thames

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Contents

| | |
|---|----|
| 1. Introduction | 1 |
| 1.1 Changes to permitted development rights (April 2015) | 1 |
| 1.2 Report structure | 2 |
| 1.3 Withdrawal of permitted development rights via an Article 4 Direction | 2 |
| 1.4 Town centre hierarchy | 4 |
| 2. Distribution of A2 uses in borough | 6 |
| 2.1 Distribution by centre | 6 |
| 2.2 Specific centres with high concentrations | 8 |
| 2.2 (a) Barnes | 8 |
| 2.3 (a) Teddington town centre | 10 |
| 2.4 (a) Richmond town centre | 12 |
| 2.5 (a) Twickenham town centre | 13 |
| 2.6 (a) East Sheen town centre | 15 |
| 2.7 (a) Hampton Hill local centre | 16 |
| 2.8 (a) Whitton town centre | 17 |
| 2.9 (a) St Margarets local centre | 19 |
| 2.10 (a) Sheen Road neighbourhood centre | 20 |
| 2.11 (a) Hampton Village local centre | 20 |
| 2.12 (a) Kew Gardens local centre | 21 |
| 2.13 (a) East Twickenham local centre | 22 |
| 2.14 (a) Ham Common local centre | 23 |
| 3 Outstanding permissions | 25 |
| 4 Capacity of centres to absorb new A2 uses | 26 |
| 4.1 Health of town centres | 26 |
| 4.2 Retail need & location of retail allocations | 30 |
| 5 Summary & recommendations for centres | 32 |
| 5.1 Distribution of A2 uses in relation to designated frontages | 32 |
| 5.2 (a) Barnes High Street | 33 |
| 5.2 (b) Teddington | 35 |
| 5.2 (c) Richmond town centre | 36 |
| 5.2 (d) Twickenham town centre | 37 |
| 5.2 (e) East Sheen town centre | 38 |
| 5.2 (f) Hampton Hill – north of centre | 39 |
| 5.2 (g) Whitton town centre | 40 |
| 5.2 (h) St Margarets local centre | 43 |
| 5.2 (i) Sheen Road neighbourhood centre | 43 |
| 5.2 (j) Hampton Village local centre | 44 |
| 5.2 (k) East Twickenham local centre | 46 |

| | |
|---|-----------|
| 5.2 (l) Kew Gardens local centre..... | 47 |
| 5.2(m) Ham Common local centre | 48 |
| 5.2(n) Friars Stile Road neighbourhood centre | 49 |
| 6 Summary and Maps | 51 |
| 6.1 Summary Table | 51 |
| 6.2 Maps of proposed Article 4 Directions..... | 55 |
| 6.2 (a) Barnes..... | 55 |
| 6.2 (b) Teddington town centre | 56 |
| 6.2 (c) Richmond town centre | 57 |
| 6.2 (d) Twickenham town centre | 57 |
| 6.2 (e) East Sheen town centre | 58 |
| 6.2 (f) Hampton Hill local centre..... | 58 |
| 6.2 (g) Whitton district centre | 59 |
| 6.2 (h) St Margarets local centre..... | 59 |
| 6.2 (i) Hampton Village local centre | 60 |
| 6.2 (j) East Twickenham local centre | 60 |
| 6.2 (k) Kew Gardens local centre..... | 61 |
| 6.2 (l) Ham Common local centre | 61 |
| 6.2 (m) Friars Stile Road neighbourhood centre..... | 62 |

1. Introduction

1.1 Changes to permitted development rights (April 2015)

- 1.1.1 In April 2015 the Government implemented a change in legislation allowing change of use from the A1 Use Class (shops) to A2 Uses (financial services)¹ without planning permission through permitted development rights (PD rights)². This legislation also removed betting offices and payday loan shops from the A2 Use Class, they now being classified as sui generis. Importantly, there is no prior approval process associated with this PD right and therefore local authorities are not able to assess any undesirable impacts on either shopping facilities or on the provision of local services as with, for example, the change from A1 or A2 to residential. As a result, it is now possible to convert hundreds of key retail units to an A2 use without the need for planning permission.
- 1.1.2 Currently, planning policies in the [Core Strategy](#) and the [Development Management Plan](#), in particular policy DMTC3 – the retail frontages policy, primarily seek to ensure that there is firstly, a good balance of uses in borough centres, and secondly, that there is sufficient shopping available to meet identified needs. The aim being to provide local shopping facilities for residents within walking distance, defined as 400 metres.
- 1.1.3 In relation to the first point, it is acknowledged that centres need a mix of retail and other compatible uses to enhance their offer, making them attractive & useful to residents in a wide capacity. However, the recent change to PD rights allows for A2 uses to locate in key retail areas in an uncontrolled way. Officers' experience has been that A2 uses often look for prominent units with high footfall.
- 1.1.4 Regarding the second point, this issue of retail capacity is dealt with more fully in section 4 of this report. Retail need in the borough has been established through a recently commissioned [Retail Study](#) produced by consultants National Lichfield & Partners for the Council.
- 1.1.5 This change in the Government's approach undermines the ability of local authorities to plan for town and local centres. Key and secondary frontages are carefully defined. The process takes into account a robust evidence base to ensure that the balance of uses is appropriate for each centre and that the duty to provide adequate shopping is met.
- 1.1.6 The Council is concerned that uncontrolled change of use could be detrimental to the health of the high streets in some areas where agglomerations of A2 uses already exist, and in other larger centres which where there is strong demand for retail and a need to provide shopping floorspace. Due to the shortage of available sites in the borough for new retail development, loss of shops could result in insufficient retail facilities being available to meet residents' needs.
- 1.1.7 The National Planning Policy Framework (NPPF) (March 2012) places a duty on local planning authorities to provide sufficient floorspace to meet the expected retail needs of the area. Para 23 states:

"It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. LPAs should undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites".

¹ The Use Classes Order classifies land uses into different categories depending on the use of the land/buildings. A2 uses include estate agents, banks & building societies and some other professional uses such as accountants and solicitors who cater for visiting members of the public.

² <http://www.legislation.gov.uk/ukxi/2015/596/introduction/made>

- 1.1.8 The NPPF goes on to set out the evidence base required for Local Plans and in para. 161 refers to the need for retail capacity studies, and states “*Local Planning Authorities should use the evidence base to assess:*

“the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;”

- 1.1.9 In addition, research suggests that centres in the borough are generally healthy compared to the national average (See Section 4), and indeed some centres such as Richmond town centre are comparatively very buoyant. Vacancy rates are generally much lower than the national average. This is not the case in other parts of the country where greater flexibility for change of use is warranted.
- 1.1.10 This research focusses on the 5 main town centres and local centres, which are the next tier in the borough’s centre hierarchy. These centres are vital in meeting local community needs.

1.2 Report structure

- 1.2.1 Section 2 of this report establishes the current number of businesses falling within the A2 use class in the borough and maps their distribution, identifying areas where agglomerations exist. The key data source used was the 2015 Town Centre Land Use Survey which is a snap-shot survey of ground floor occupiers in centres across the borough. This Survey is undertaken annually by the Council and covers approximately 2,500 premises, the results of which are reported via the [Authority’s Monitoring Report](#). The data were cross-checked against 2 further datasets to improve accuracy: the Business Rates register (at April 2015), and Experian employment data (2012). Section 3 reports on outstanding A2 permissions.
- 1.2.2 Analysis of the level and distribution of A2 uses is only part of the overall picture in terms of potential impact of this new PD right and thus Section 4 goes on to assess the health of the borough’s town & local centres looking specifically at the numbers of vacant retail units. It also draws on the [Retail Study](#) (December 2014) produced by consultants National Lichfield & Partners which forecasts modest, but positive retail need for 2024. This need, translated as the adopted and proposed site allocations, together with definition of the amount of designated shopping frontage (policy DMTC3) in each centre are key measures that local authorities use to plan for retail growth as required by the NPPF. It is important to consider the potential impact of the loss of retail via the change to PD rights on centres expected to accommodate growth.
- 1.2.3 Section 5 pulls together the various strands of the analyses for each centre. Recommendations are made regarding the Council’s approach to dealing with the impact of this change to PD rights and Section 6 includes a Summary Table and maps of areas where a proposed Article 4 Direction could apply.

1.3 Withdrawal of permitted development rights via an Article 4 Direction

- 1.3.1 PD rights can be withdrawn if the local planning authority issues an Article 4 Direction. The Secretary of State has the power to make a direction modifying or cancelling an Article 4 direction for a class of permitted development right. In areas where an Article 4 Direction is in force, planning permission must be sought for development which would otherwise be permitted, allowing the authority to consider *the planning merits of each case*. It does not introduce a blanket ban.
- 1.3.2 The Council considers that the detailed assessment undertaken and documented in this report justify an Article 4 Direction. Indeed, bearing in mind the characteristics of the borough’s essentially buoyant town centres and the lack of available sites to meet retail need, this approach is considered essential to allow the authority to properly plan for retail growth.

1.3.3 Consequently, the Council intends to introduce a non-immediate Article 4 Direction³ to withdraw permitted development rights granted by Schedule 2, Part 3, Class D of the Town and Country Planning (General Permitted Development) Order 2015 for changes of use from shops (Class A1) to financial and professional services (Class A2) covering **parts of** the following centres:

- Richmond town centre
- Twickenham town centre
- East Sheen town centre
- Teddington town centre
- Whitton town centre
- Barnes local centre
- Hampton Hill local centre
- St Margarets local centre
- Hampton Village local centre
- East Twickenham local centre
- Kew Gardens local centre
- Ham Common local centre
- Friars Stile Road neighbourhood centre

³ The Council publishes the Article 4 Direction and a year later the Direction comes into force, providing that the Secretary of State has not intervened.

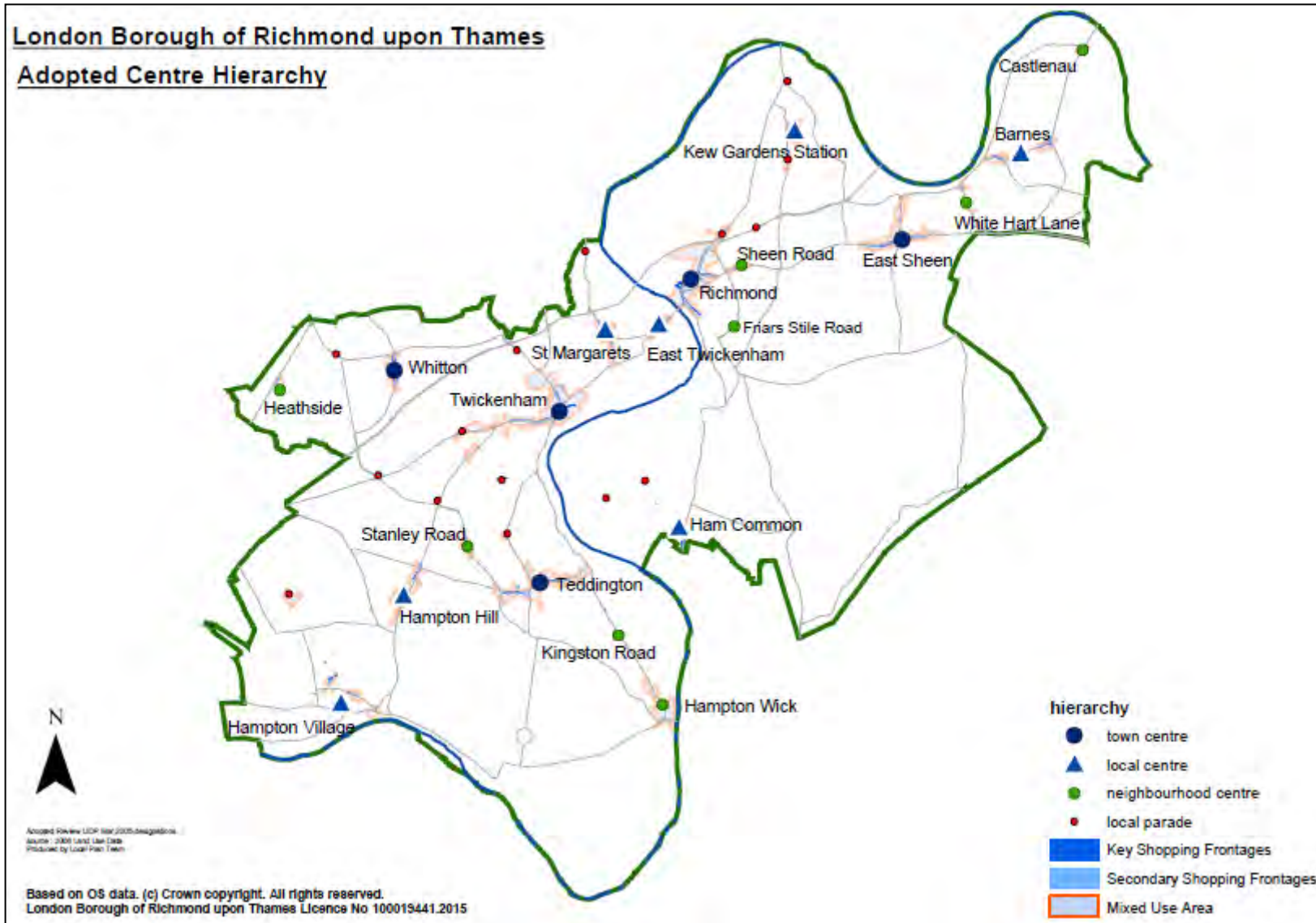
1.4 Town centre hierarchy

- 1.4.1 The [London Plan](#) (2015) classifies centres in Greater London according to a town centre network (Annex 2). Richmond main centre is classified as a “major” centre (with a night-time cluster of regional/sub-regional importance) and Twickenham, Teddington, East Sheen and Whitton are classified as “district” centres.
- 1.4.2 Core Strategy Policy CP8 sets out the hierarchy below district centre level for local & neighbourhood centres and local parades. All parts of the hierarchy contribute to meeting community needs. The Core Strategy’s spatial strategy seeks to steer major development into the 5 main town centres. Local centres are large centres with a significant role to play in providing shopping and services.

Table 1.4.1: Adopted Centre Hierarchy

| | |
|---------------|-----------------------|
| Town | Richmond (major) |
| | Twickenham (district) |
| | East Sheen (district) |
| | Teddington (district) |
| | Whitton (district) |
| Local | Barnes |
| | East Twickenham |
| | Hampton Hill |
| | Hampton Village |
| | Ham Common |
| | Kew Gardens Station |
| | St Margarets |
| neighbourhood | Castelnau |
| | Friars Stile Road |
| | Hampton Wick |
| | Heathside |
| | Kingston Road |
| | Stanley Road |
| | Sheen Road |
| | White Hart Lane |
| local parade | Ashburnham Road |
| | Fulwell |
| | Ham Street/Back Lane |
| | Hampton Nursery Lands |
| | Hospital Bridge Road |
| | Kew Green |
| | Kew Road |
| | Lower Mortlake Road |
| | Nelson Road |
| | St Margarets Road |
| | Sandycombe Road |
| | Strawberry Hill |
| | Twickenham Green |
| | Waldegrave Road |
| Whitton Road | |

Source: Local Plan Team



Source: LBRuT Local Plan Team

2. Distribution of A2 uses in borough

2.1 Distribution by centre

- 2.1.1 The key data source used was the 2015 Town Centre Land Use Survey which is a snap-shot survey recording the ground floor occupiers in centres across the borough. This Survey is undertaken annually by the Council and covers approximately 2,500 premises, the results of which are reported via the [Authority's Monitoring Report](#). In order to capture as many A2 businesses as possible, the land use data were cross-checked against 2 further datasets: the Business Rates register (at April 2015), and Experian employment data (2012)⁴.
- 2.1.2 There are an estimated 209 A2 uses in the borough. The map on the following page shows their distribution. Table 2.1.1 gives more detail on how the uses are distributed between the borough's centres, and shows that there is an uneven spread. As expected, larger centres have more A2 uses. The table also includes the percentage of A2 uses (calculated using the total number of units covered by the Land Use Survey as a denominator) and Table 2.1.2 ranks those centres with 10 or more A2 uses. Barnes clearly has the largest proportion of A2 uses of any of these centres.

⁴ In relation to the small number of A2 uses such as accountants and solicitors, a number of criteria were used to assess whether an individual premise fell within the A2 or B1 (office) use class:

- location – whether the business is located in a town centre/ mixed used area/ area with commercial uses, or in close proximity to one of the above;
- whether the premises appears to be available to visiting members of the public, assessed by
 - (1) existence of a business website with relevant details to allow/encourage a visit in person
 - (2) the appearance of the premises in terms of ease of access for the public
- whether the premises had separate access from the ground floor if located on upper floors.

Distribution of A2 uses across the borough (2015)

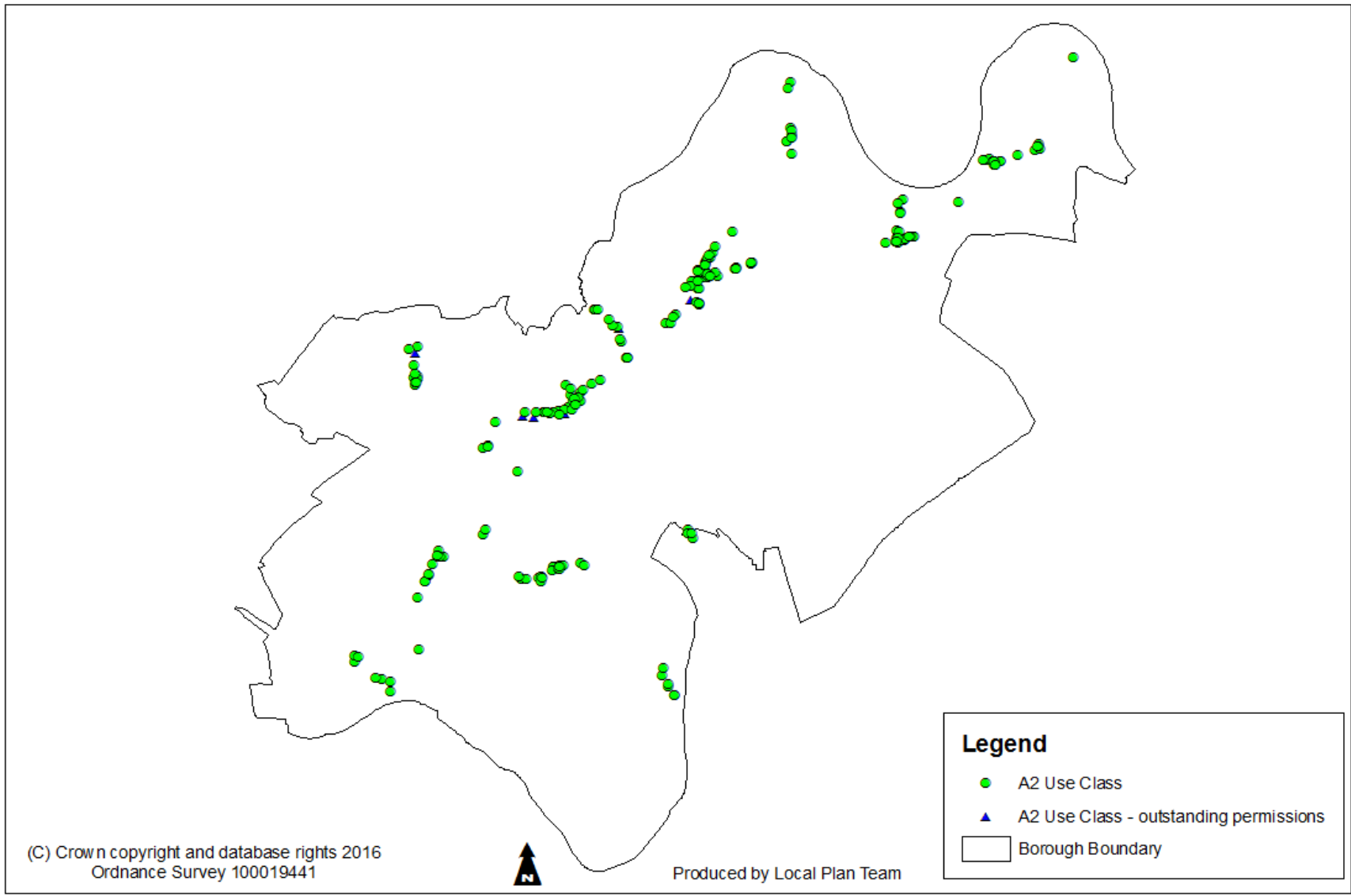


Table 2.1.1: Numbers of A2 uses in the borough's centres (centres with more than 3 A2 Uses) 2015

| Name of centre | number of A2 uses | %age of total A2 uses | %age of total units in centre* |
|-----------------|-------------------|-----------------------|--------------------------------|
| Richmond | 36 | 17.2 | 10.1 |
| Twickenham | 29 | 13.9 | 9.8 |
| East Sheen | 25 | 12.0 | 8.6 |
| Teddington | 20 | 9.6 | 10.3 |
| Barnes | 18 | 8.6 | 14.3 |
| Hampton Hill | 11 | 5.3 | 8.3 |
| Whitton | 11 | 5.3 | 8.2 |
| St Margarets | 8 | 3.8 | 11.9 |
| Sheen Road | 6 | 2.9 | 14.6 |
| Hampton Village | 5 | 2.4 | 6.3 |
| Hampton Wick | 5 | 2.4 | 8.8 |
| Kew Gardens | 5 | 2.4 | 9.8 |
| East Twickenham | 4 | 1.9 | 5.3 |
| Ham Common | 4 | 1.9 | 9.3 |
| Crown Road | 3 | 1.4 | 30.0** |
| Hampton Road | 3 | 1.4 | 13.6 |
| Sandycombe Road | 3 | 1.4 | 7.0 |
| Thames Street | 3 | 1.4 | n/a |
| Total | 209 | | |

Source: LBRuT, Local Plan Team, 2015

*Note this denominator will not include the small number of properties outside of AMU/TCB included

** Note – very small centre and therefore the percentage may appear artificially high

Figures may differ slightly from percentages reported in AMR as this dataset includes small number of properties not included in the Town Centre Land Use Surveys for example those on upper floors.

NB Several centres have fewer than 3 A2 Uses

Table 2.1.2: Ranking of percentages for centres with 10 or more A2 uses

| Name of centre | number of A2 uses | % of total units in centre* |
|----------------|-------------------|-----------------------------|
| Barnes | 18 | 14.3 |
| Teddington | 20 | 10.3 |
| Richmond | 35 | 10.1 |
| Twickenham | 29 | 9.8 |
| East Sheen | 25 | 8.6 |
| Hampton Hill | 11 | 8.3 |
| Whitton | 11 | 8.2 |

Source: LBRuT, Local Plan Team, 2015

*Note this denominator will not include the small number of properties outside of AMU/TCB included

2.1.5 The following section presents maps of those centres with the most A2 uses, illustrating the location of such uses. These correspond with those defined as either town or local centres in the borough's centre hierarchy (as set out in Table 1.4.1). Sheen Road, which is defined as a neighbourhood centre is also included due to the high proportion of A2 uses (15%) represented. Friars Stile Road neighbourhood centre is also included due to its importance in meeting the needs of residents with limited food shopping facilities.

2.2 Specific centres with high concentrations

2.2 (a) Barnes

2.2.1 The following table and maps show the distribution of A2 uses in Barnes at the Castelnau/Church Road end and in Barnes High Street. With 18 A2 uses making up 14% of units in the centre there is a clear concentration, most noticeable in Barnes High Street. In

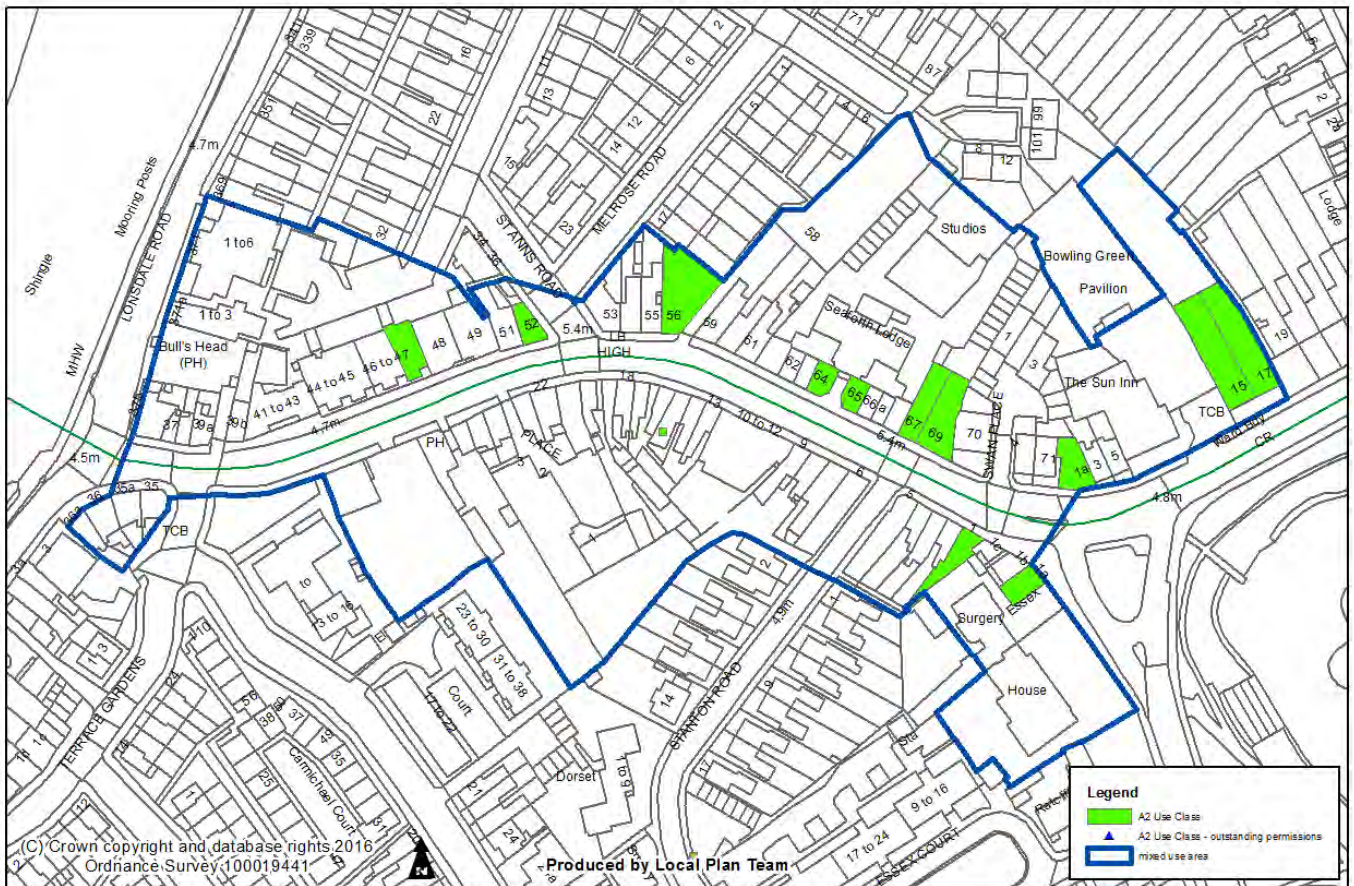
terms of the number of businesses in the property services sector, Barnes has considerably more than UK average according to GOAD (2015). GOAD produce an index which allows sectors in any individual centre to be compared with the average for the UK. A figure of 100 equals the average, a figure above 100 means that that sector is over-represented. For Barnes, the figure for property services was 331 in 2015 – well over the average.

Table 2.2.1: A2 Uses in Barnes local centre

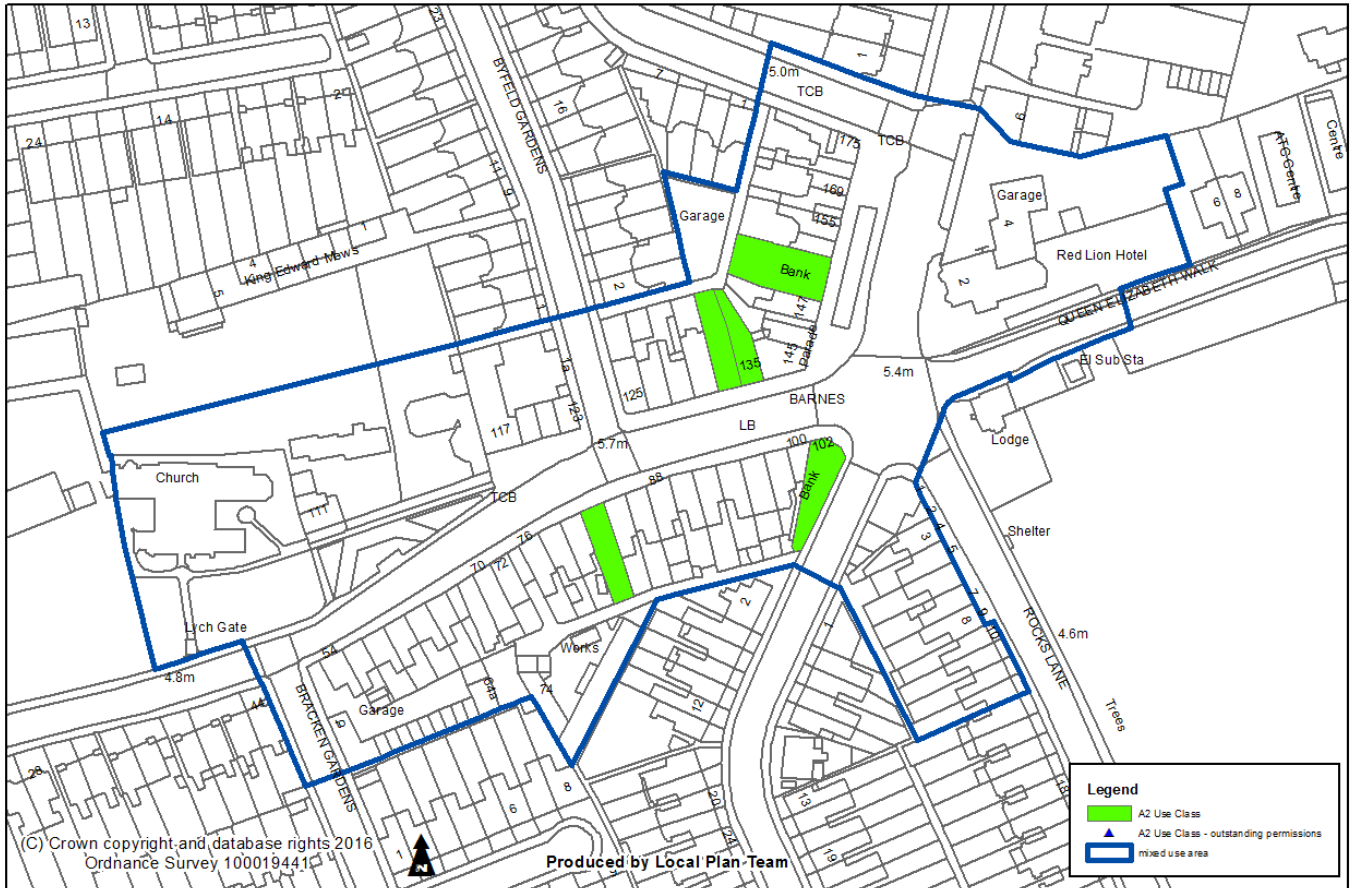
| Premise Name | No | Street Address | Description | Local Plan designation |
|----------------------|-----------|--------------------|-------------------------|-----------------------------|
| Dexters | 68-69 | Barnes High Street | Estate Agent | Secondary shopping frontage |
| Foxtons | 47-48 | Barnes High Street | Estate Agent | Non-designated frontage |
| Savills | 52 | Barnes High Street | Estate Agent | Key shopping frontage |
| Hamptons | 67 | Barnes High Street | Estate Agent | Secondary shopping frontage |
| James Anderson | 64 | Barnes High Street | Estate agent - sales | Key shopping frontage |
| James Anderson | 65 | Barnes High Street | Estate agent - lettings | Secondary shopping frontage |
| Knight Frank | 56 | Barnes High Street | Estate Agent | Key shopping frontage |
| Winkworth | 1-2 | Barnes High Street | Estate Agent | Secondary shopping frontage |
| Laurent Residential | 1a | Barnes High Street | Estate Agent | Secondary shopping frontage |
| Apparent Properties | 15 | Church Road | Estate Agent | Non-designated frontage |
| Barclay's Bank | 17 | Church Road | Bank | Non-designated frontage |
| Barnard Marcus | 82 | Church Road | Estate Agent | Key shopping frontage |
| Carter Jonas Boileau | 135 | Church Road | Estate Agent | Key shopping frontage |
| Charles Banks & Rea | 1 | Church Road | Estate Agent | Non-designated frontage |
| Chestertons | 133 | Church Road | Estate Agent | Key shopping frontage |
| Marsh & Parsons | 73-75 | Church Road | Estate Agent | Key shopping frontage |
| NatWest | 149 - 151 | Church Road | Bank | Secondary shopping frontage |
| Vacant | 102 | Church Road | Vacant HSBC | Key shopping frontage |

Source: LBRuT Local Plan Team (2015)

Distribution of A2 uses in Barnes - High Street (2015)



Distribution of A2 uses in Barnes - Church Road (2015)



2.3 (a) Teddington town centre

Table 2.3.1: A2 Uses in Teddington town centre

| Premise Name | No | Street Address | Description | Local Plan designation |
|---------------------------------------|---------------|-----------------------|------------------|------------------------------------|
| Fine and Country | Oval Court | Broad Street | Estate Agent | Secondary shopping frontage |
| Websters | 36 | Broad Street | Estate Agent | Key shopping frontage |
| Halifax | 18 | Broad Street | Building Society | Key shopping frontage |
| Snellers | 74 | Broad Street | Estate Agent | Secondary shopping frontage |
| TaxAssist Accountant | 76 | Broad Street | Accountant | Secondary shopping frontage |
| Barclays | 1-3 | The Causeway | Bank | Secondary shopping frontage |
| Kagan, Moss & Co. | 22 | The Causeway | Solicitors | Secondary shopping frontage |
| Cooperfaure Acconts. | FF, 131 | High Street | accountant | Upper floor, non-designated |
| Featherstone Leigh | 35 | High Street | Estate Agent | Key shopping frontage |
| HSBC | 42 | High Street | Bank | Key shopping frontage |
| Curchods | 21 | High Street | Estate Agent | Key shopping frontage |
| Dexters | 61 | High Street | Estate Agent | Key shopping frontage |
| Hamptons | 164 | High Street | Estate Agent | Non-designated frontage |
| Jackson, Stops & Staff | 36 | High Street | Estate Agent | Key shopping frontage |
| Lloyds | 23 | High Street | Bank | Key shopping frontage |
| Milestone Residential | 43 | High Street | Estate Agent | Key shopping frontage |
| NatWest | 6 | High Street | Bank | Key shopping frontage |
| Executive Mortgages & Investments Ltd | FF, 6 | Park Road | mortgage broker | Non-designated frontage |
| Milestone Commercial | 4 | Vicarage Road | Estate Agent | Non-designated frontage - rear KSF |
| Jones & Jones | Wickham House | 2 Upper Teddington Rd | mortgage broker | Non-designated frontage |

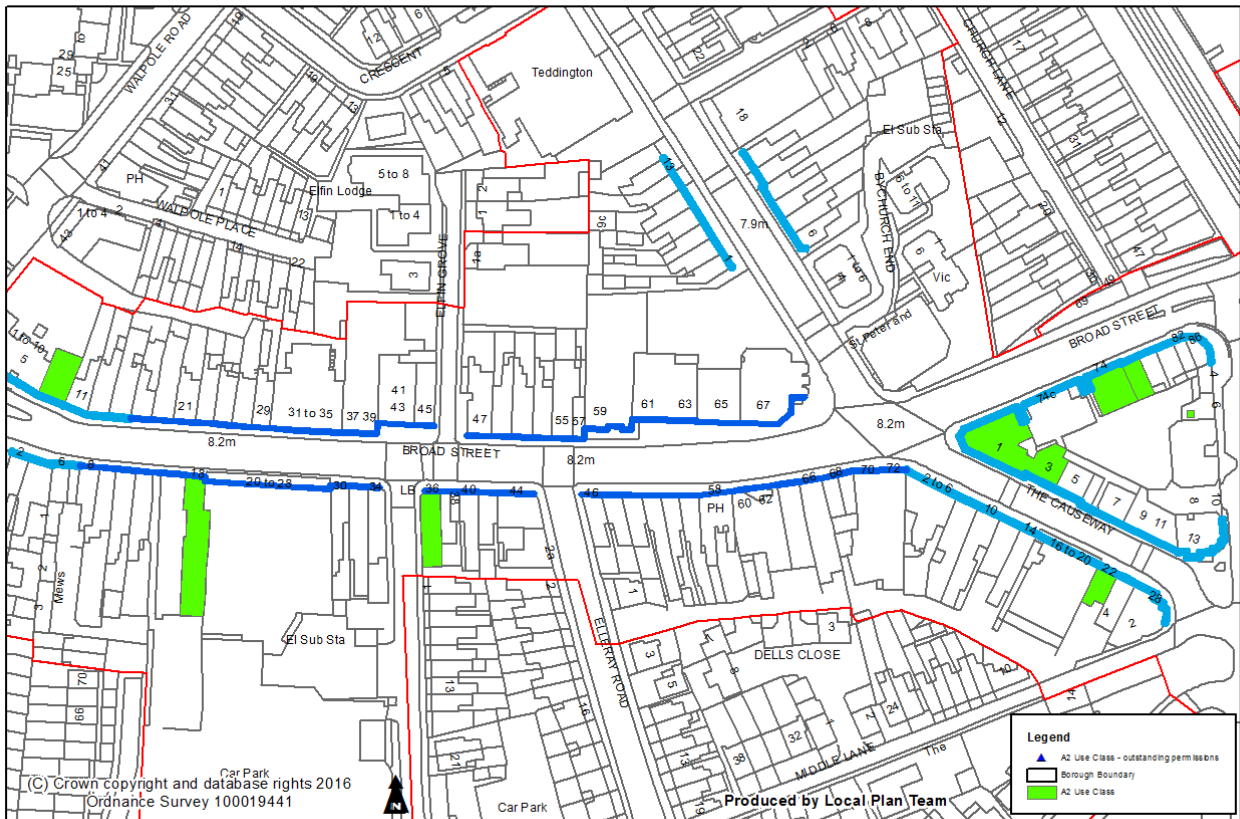
Source: LBRuT Local Plan Team (2015)

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2.3.1 The following maps show the distribution of A2 uses in Teddington town centre. They show two clusters, one in the secondary frontage around the Causeway, and the other more significant cluster on the High Street in key shopping frontage.

Distribution of A2 uses in Teddington - Broad Street (2015)



Distribution of A2 uses in Teddington - High Street (2015)



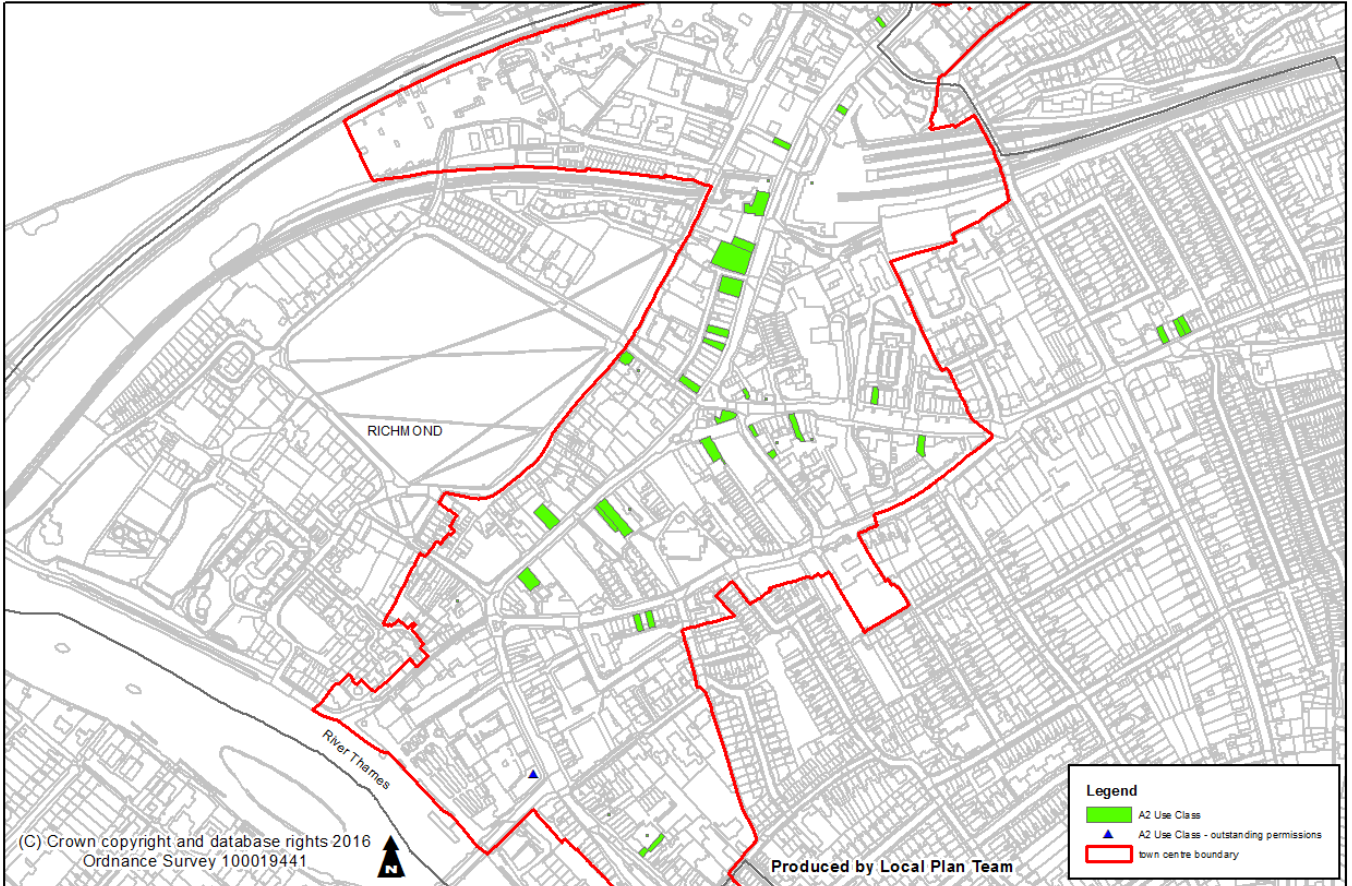
2.4 (a) Richmond town centre

Table 2.4.1: A2 Uses in Richmond town centre

| Premise Name | No | Street Address | Description | Local Plan designation |
|-------------------------------|--------|------------------------------------|---------------------------------------|--|
| Major, Son & Phipps | 5A | Dome Building, The Square | Auctioneers/ private estate agency | Key shopping frontage |
| Knight Frank | 5 | Duke Street | Estate Agent | Secondary shopping frontage |
| Parkgate | 8 | Eton Street | Estate Agent Lettings | Secondary shopping frontage |
| Parasol Financial | 23-24 | George Street | financial advisor | Key shopping frontage FF |
| Barclays | 8 | George Street | Bank | Key shopping frontage |
| HSBC | 67 | George Street | Bank | Key shopping frontage |
| NatWest | 22 | George Street | Bank | Key shopping frontage |
| Santander | 38 | George Street | Building Society | Key shopping frontage |
| Thomas Exchange Global Ltd | 21 | George Street | Travel Money | Key shopping frontage |
| Savills | 40-42 | Hill Rise | Estate Agents | Key shopping frontage |
| Holbrook Property Finance | 34-38 | Hill Rise | mortgage broker | Non-designated frontage |
| Antony Roberts | 3 | Kew Road | Estate Agent | Secondary shopping frontage |
| CARPENTER KEEN LLP | 18-20 | Hill Rise | accountant | Key shopping frontage - Upper floor |
| Prestige Pawnbrokers | 55 | Kew Road | Pawnbroker | Secondary shopping frontage |
| Winkworth | 5 | Kew Road, Westminster House | Estate Agent | Secondary shopping frontage |
| H.A HYATT & CO | 4 to 5 | King Street | accountant | Key shopping frontage - upper floors |
| Jackson, Stops & Staff | 3 | Lichfield Terrace | Estate agent | Key shopping frontage |
| Chase Buchanan | 20 | Red Lion Street | Estate Agent | Secondary shopping frontage |
| Featherstone Leigh | 24 | Red Lion Street | Estate agent | Secondary shopping frontage |
| Dexters | 1 | Sheen Road | Estate Agent | Key shopping frontage |
| Featherstone Leigh | 15 | Sheen Road | Estate agent | Secondary shopping frontage |
| Gascoigne Pees | 17 | Sheen Road | Estate agent | Secondary shopping frontage |
| John D Wood & Co | 31 | Sheen Road | Estate Agent | Non-designated frontage |
| Fentons | 1 | The Green | accountant | Non-designated frontage |
| Hamptons | 8 | The Quadrant | Estate Agent | Key shopping frontage |
| Barnard Marcus | 26 | The Quadrant | Estate Agent | Secondary shopping frontage |
| Chancellors | 23 | The Quadrant | Estate Agent | Secondary shopping frontage |
| Halifax | 16-18 | The Quadrant | Building Society | Key shopping frontage |
| Lloyds | 19-21 | The Quadrant | Bank | Secondary shopping frontage |
| Marsh & Parsons | 1 | The Quadrant | Estate Agents | Key shopping frontage |
| Royal Bank of Scotland | 26A | The Quadrant | Bank | Secondary shopping frontage |
| Vacant | 10 | The Quadrant | Vacant A2 | Key shopping frontage |
| Foxtons | 27A | The Quadrant (Richmond Station) | Estate Agent | Secondary shopping frontage |
| Nationwide | 3 | The Square | Building Society | Key shopping frontage |
| Rowberry Morris Solicitors | 4a | The Square | Solicitors | Non-designated frontage |
| Dexters Lettings | 1 | Union Court | estate agent | Non-designated frontage – rear of KSF |

Source: LBRuT Local Plan Team (2015)

Distribution of A2 uses in Richmond town centre (2015)



2.4.1 Richmond has the largest number of A2 uses (35) of any centre in the borough, reflecting the fact that it is by far the largest centre. They are dispersed throughout the centre. However, there is a noticeable concentration in the Quadrant and currently fewer such uses to the south of the centre on Hill Street/Hill Rise & Richmond Hill.

2.5 (a) Twickenham town centre

Table 2.5.1: A2 Uses in Twickenham town centre

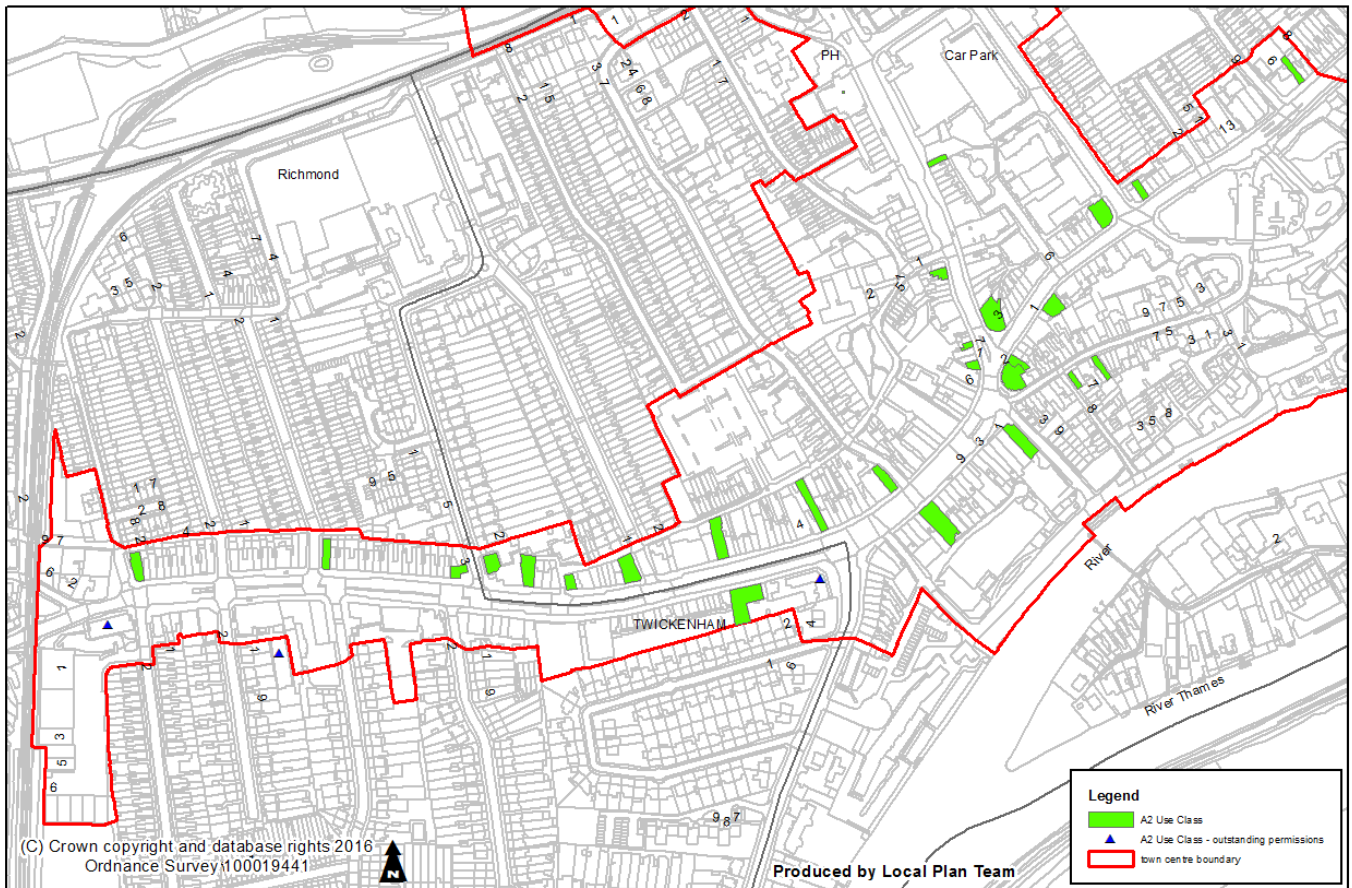
| Premise Name | No | Street Address | Description | Local Plan designation |
|-------------------------------|-------|----------------|------------------|-----------------------------------|
| Milestone and Collis | 40 | Church Street | Estate Agent | Key shopping frontage |
| Milestone and Collis | 38 | Church Street | Estate Agent | Key shopping frontage |
| Chase Buchanan | 122 | Heath Road | Estate Agent | Secondary shopping frontage |
| Milestone Residential | 86 | Heath Road | Estate Agent | Secondary shopping frontage |
| Nationwide | 32 | Heath Road | Building Society | Key shopping frontage |
| Snellers | 74 | Heath Road | Estate agent | Secondary shopping frontage |
| Dexters | 84 | Heath Road | Estate Agent | Secondary shopping frontage |
| Featherstone Leigh | 46-48 | Heath Road | Estate Agent | Secondary shopping frontage |
| Websters | 164 | Heath Road | Estate Agent | Secondary shopping frontage |
| Your Move | 64-66 | Heath Road | Estate Agent | Secondary shopping frontage |
| Lloyds Bank | 17 | Heath Road | Bank | Secondary shopping frontage |
| Featherstone Leigh Commercial | 34-38 | Hill Rise | Estate Agent | Non-designated frontage - adj KSF |
| NatWest | 23-25 | King Street | Bank | Key shopping frontage |
| Santander | 1 | King Street | Building Society | Key shopping frontage |
| TSB Building Society | 38 | King Street | Building Society | Key shopping frontage |
| Gascoigne Pees | 60 | King Street | Estate Agent | Key shopping frontage |

| Premise Name | No | Street Address | Description | Local Plan designation |
|------------------------|-------|----------------|--------------------|-----------------------------|
| Halifax | 1 | London Road | Building Society | Key shopping frontage |
| HSBC | 2-6 | London Road | Bank | Key shopping frontage |
| Job Centre | 63A | London Road | Job Centre | Secondary shopping frontage |
| Martin & Co | 44 | London Road | Estate Agent | Key shopping frontage |
| Townends | 25 | London Road | Estate Agent | Secondary shopping frontage |
| Vacant | 7 | London Road | Vacant | Key shopping frontage |
| Emin Read & Solicitors | 15 | Richmond Road | Solicitors | Non-designated frontage |
| Marquis and Co. | 54 | Richmond Road | Estate Agent | Non-designated frontage |
| Barclay's | 2 | York Street | Bank | Key shopping frontage |
| Foxtons | 20-24 | York Street | Estate Agent | Non-designated frontage |
| Source 4 Recruitment | 39 | York Street | Recruitment Agency | Non-designated frontage |
| Chase Buchanan | 4 | York Street | Estate Agent | Secondary shopping frontage |
| Haart | 33-35 | York Street | Estate Agent | Non-designated frontage |

Source: LBRuT Local Plan Team (2015)

2.5.1 Twickenham has 29 businesses in the A2 use class, 17 of which are estate agents. GOAD data suggest that there is an over-representation of businesses in the property services sector in Twickenham compared to the UK average (Index of 155 for Twickenham, where 100 equals the UK average). They are distributed throughout the centre, particularly on the northern side of Heath Road.

Distribution of A2 uses in Twickenham town centre (2015)



2.6 (a) East Sheen town centre

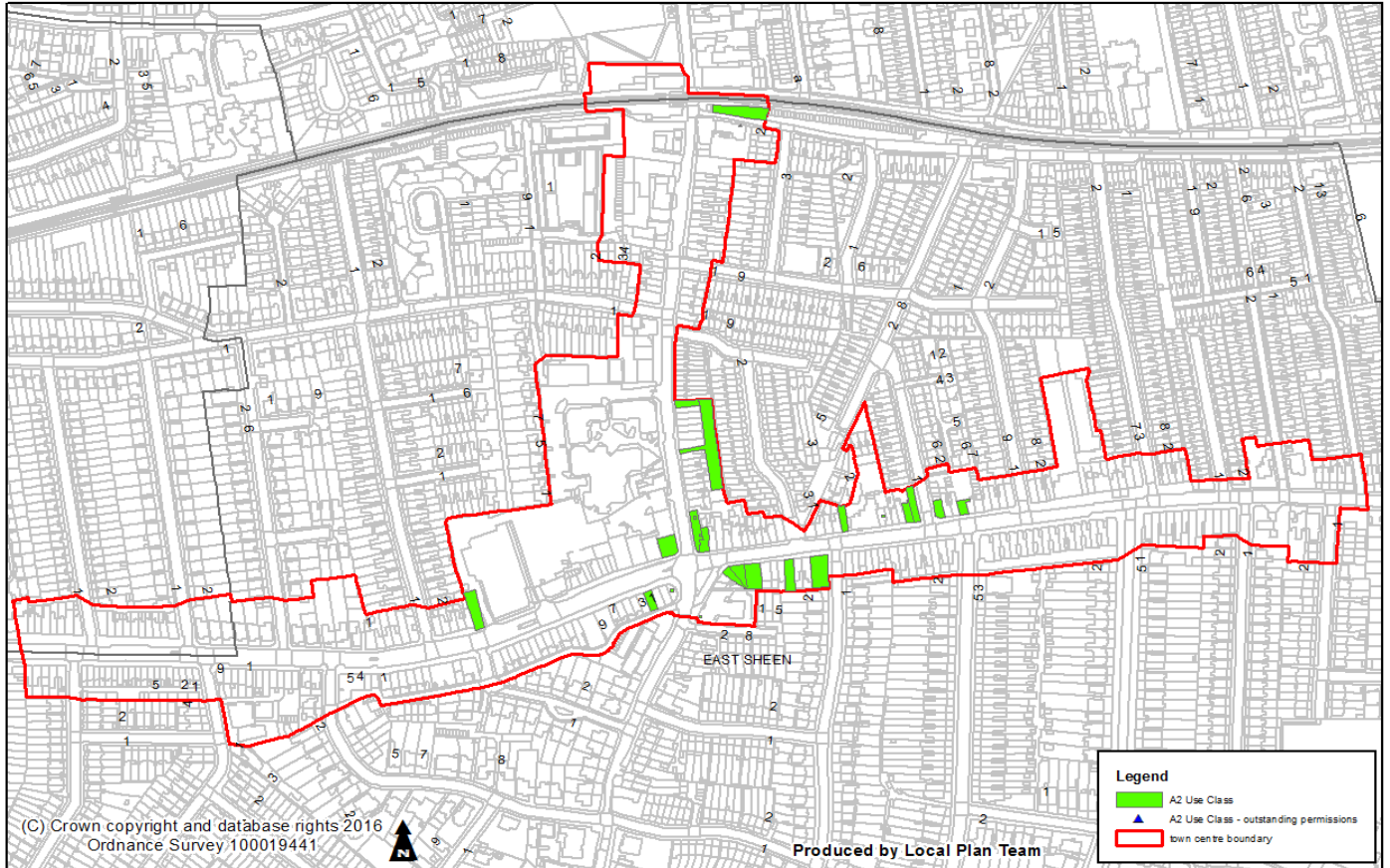
Table 2.6.1: A2 Uses in East Sheen town centre

| Premise Name | No | Street Address | Description | Local Plan designation |
|------------------------------|-----------------------------|-------------------------------|--------------------|---|
| Robinsons | 4 | Parkway House | Estate Agent | Key shopping frontage |
| Crystal & Co | 105 | Sheen Lane | Estate Agent | Secondary shopping frontage |
| Guy Lewis | 137 | Sheen Lane | Estate Agent | Key shopping frontage |
| Chestertons | 254a | Sheen Lane (rear of 254 URRW) | Estate Agent | Non-designated frontage |
| Gascoigne Pees | | Sheen Lane (rear of 254 URRW) | Estate Agent | Non-designated frontage |
| Artisan Accounts Ltd | Unit 3c Hampton Works | 117-119 Sheen Lane | accountant | Non-designated frontage |
| IMC | Lambourn House | 17 Sheen Lane | mortgage broker | Non-designated frontage |
| Cripps Dransfield | 206 | Upper Richmond Road West | accountant | Secondary shopping frontage - upper floors |
| Apparent Properties | 204 | Upper Richmond Road West | Estate Agent | Secondary shopping frontage |
| Barclays | 256-258 | Upper Richmond Road West | Bank | Key shopping frontage |
| Barnard Marcus | 371 | Upper Richmond Road West | Estate Agent | Key shopping frontage |
| Featherstone Leigh | 361 | Upper Richmond Road West | Estate Agent | Key shopping frontage |
| Gascoigne Pees | 254 | Upper Richmond Road West | Estate Agent | Key shopping frontage |
| Hamptons | 252 | Upper Richmond Road West | Estate Agent | Key shopping frontage |
| HSBC | 357-359 | Upper Richmond Road West | Bank | Key shopping frontage |
| James Anderson | 363 | Upper Richmond Road West | Estate Agent | Key shopping frontage |
| Marsh & Parsons | 202 | Upper Richmond Road West | Estate Agent | Secondary shopping frontage |
| NatWest | 341 | Upper Richmond Road West | Bank | Key shopping frontage |
| Parkgate | 218 | Upper Richmond Road West | Estate Agent | Secondary shopping frontage |
| Santander | 347 | Upper Richmond Road West | Building Society | Key shopping frontage |
| Savills | 298a | Upper Richmond Road West | Estate Agent | Secondary shopping frontage |
| Stuart Macenzie | 212b | Upper Richmond Road West | Estate Agent | Secondary shopping frontage |
| Vacant | 196 | Upper Richmond Road West | Vacant A2 | Secondary shopping frontage |
| White Hart Associates LLP | East House | 109 South Worple Way | accountant | Non-designated frontage |
| Farrow Accounting | 95 | South Worple Way | accountant | Non-designated frontage |

Source: LBRuT Local Plan Team (2015)

2.6.1 Approximately 1 in 10 businesses in the district centre of East Sheen are in the A2 use class. There are 20 in total. Three quarters of which are estate agents. Most are located in the central part of East Sheen around the intersection of the Upper Richmond Road West and Sheen Lane and to the east of this point.

Distribution of A2 uses in East Sheen town centre (2015)



2.7 (a) Hampton Hill local centre

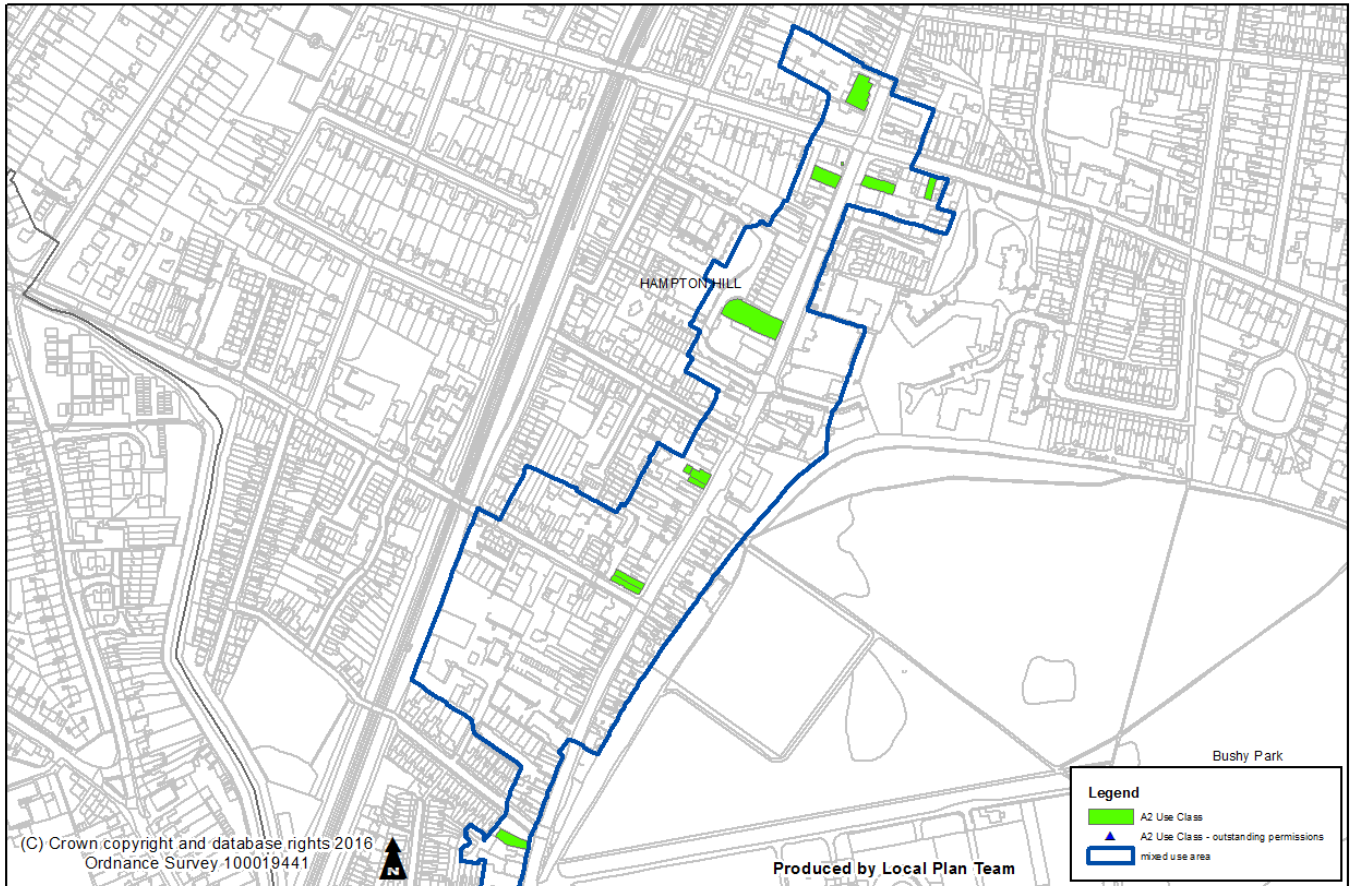
Table 2.7.1: A2 Uses in Hampton Hill local centre

| Premise Name | No | Street Address | Description | Local Plan designation |
|------------------------------------|------------------|----------------|--------------|-----------------------------|
| Accord Accountants | 5 | New Broadway | Accountants | Non-designated frontage |
| Career Counselling | 39 | High Street | Office | Non-designated frontage |
| Chase Buchanan | 101 | High Street | Estate Agent | Secondary shopping frontage |
| Chase Buchanan | 141-143 | High Street | Estate Agent | Secondary shopping frontage |
| Coopers | 139 | High Street | Estate Agent | Secondary shopping frontage |
| Pennington's Chartered Accountants | Wellington House | High Street | accountant | Secondary shopping frontage |
| Philip Hodges | 191-193 | High Street | Estate Agent | Secondary shopping frontage |
| Snellers | 197-201 | High Street | Estate Agent | Secondary shopping frontage |
| Tiffin | 103 | High Street | Estate Agent | Secondary shopping frontage |
| Vacant | 165-167 | High Street | Vacant bank | Non-designated frontage |
| Your Move | 118a-b | High Street | Estate Agent | Secondary shopping frontage |

Source: LBRuT Local Plan Team (2015)

2.7.1 The A2 uses are clustered towards the north of the centre, particularly at the intersection of Hampton Road and the High Street. The majority are located in secondary shopping frontage.

Distribution of A2 uses in Hampton Hill (2015)



2.8 (a) Whitton town centre

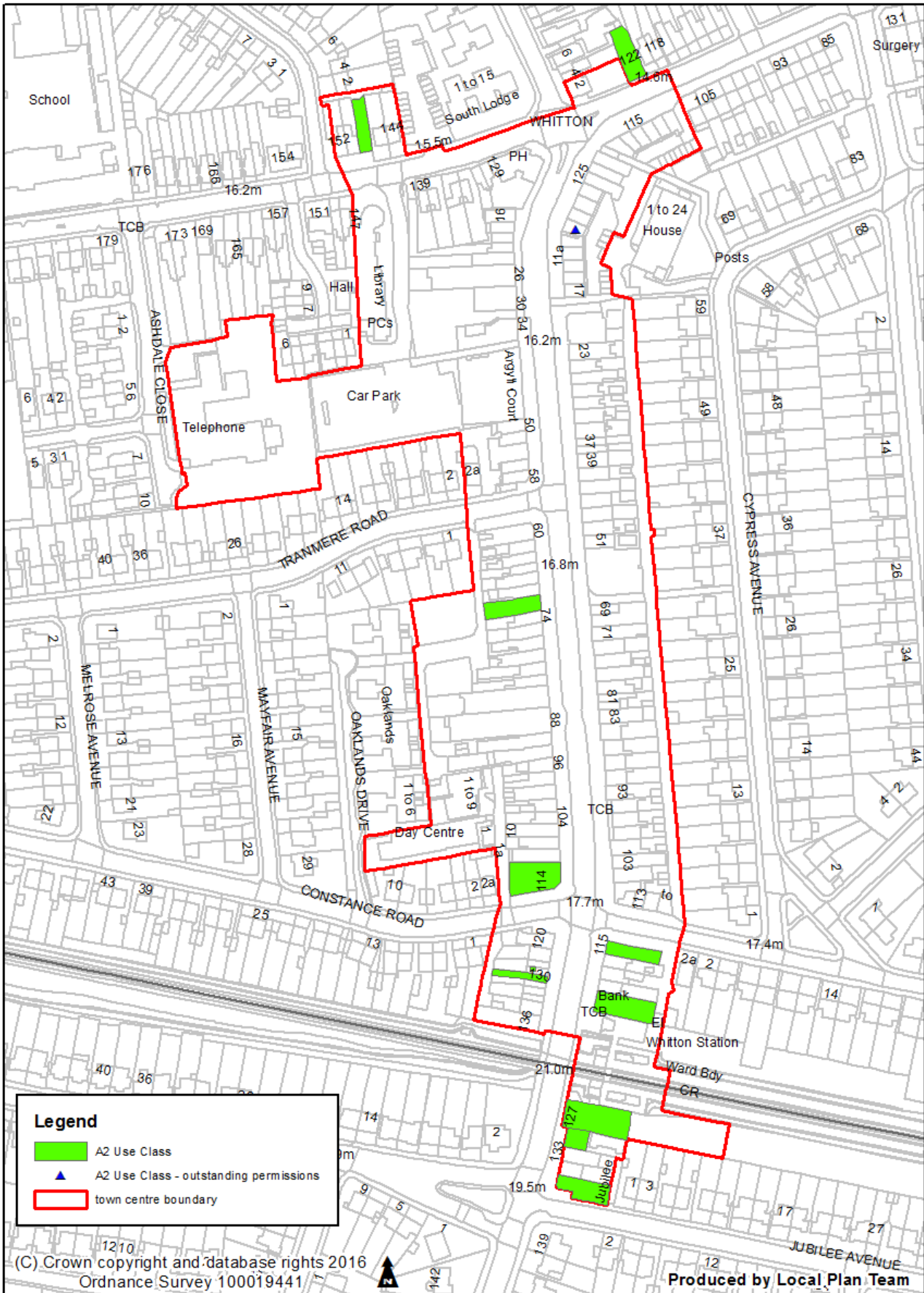
Table 2.8.1: A2 Uses in Whitton district centre

| Premise Name | No | Street Address | Description | Local Plan designation |
|--------------------------|----------|----------------|--------------------|-----------------------------|
| Barclays | 112-114 | High Street | Bank | Secondary shopping frontage |
| HSBC | 123 | High Street | Bank | Secondary shopping frontage |
| Lloyds | 72 | High Street | Bank | Key shopping frontage |
| Milestone Residential | 128 | High Street | Estate Agent | Secondary shopping frontage |
| Your Move | 115 | High Street | Estate Agent | Secondary shopping frontage |
| Angel Recruitment | 148 | Nelson Road | Recruitment agency | Non-designated frontage |
| Dunlop & Co | 122 | Nelson Road | Estate Agent | Non-designated frontage |
| Halifax | 137 | Percy Road | Estate Agent | Non-designated frontage |
| Matthew Swing & Partners | 131-131B | Percy Road | Estate agent | Non-designated frontage |
| Townends | 127-129 | Percy Road | Estate Agent | Non-designated frontage |
| MHR Accountancy | 126a | High Street | accountant | Non-designated frontage |

Source: LBRuT Local Plan Team (2015)

2.8.1 8% of businesses in Whitton district centre are in A2 use. Just over half are not located in designated frontage. There is a clear agglomeration towards the south of the centre in the frontages to the immediate north and south of the railway line.

Distribution of A2 uses in Whitton town centre (2015)



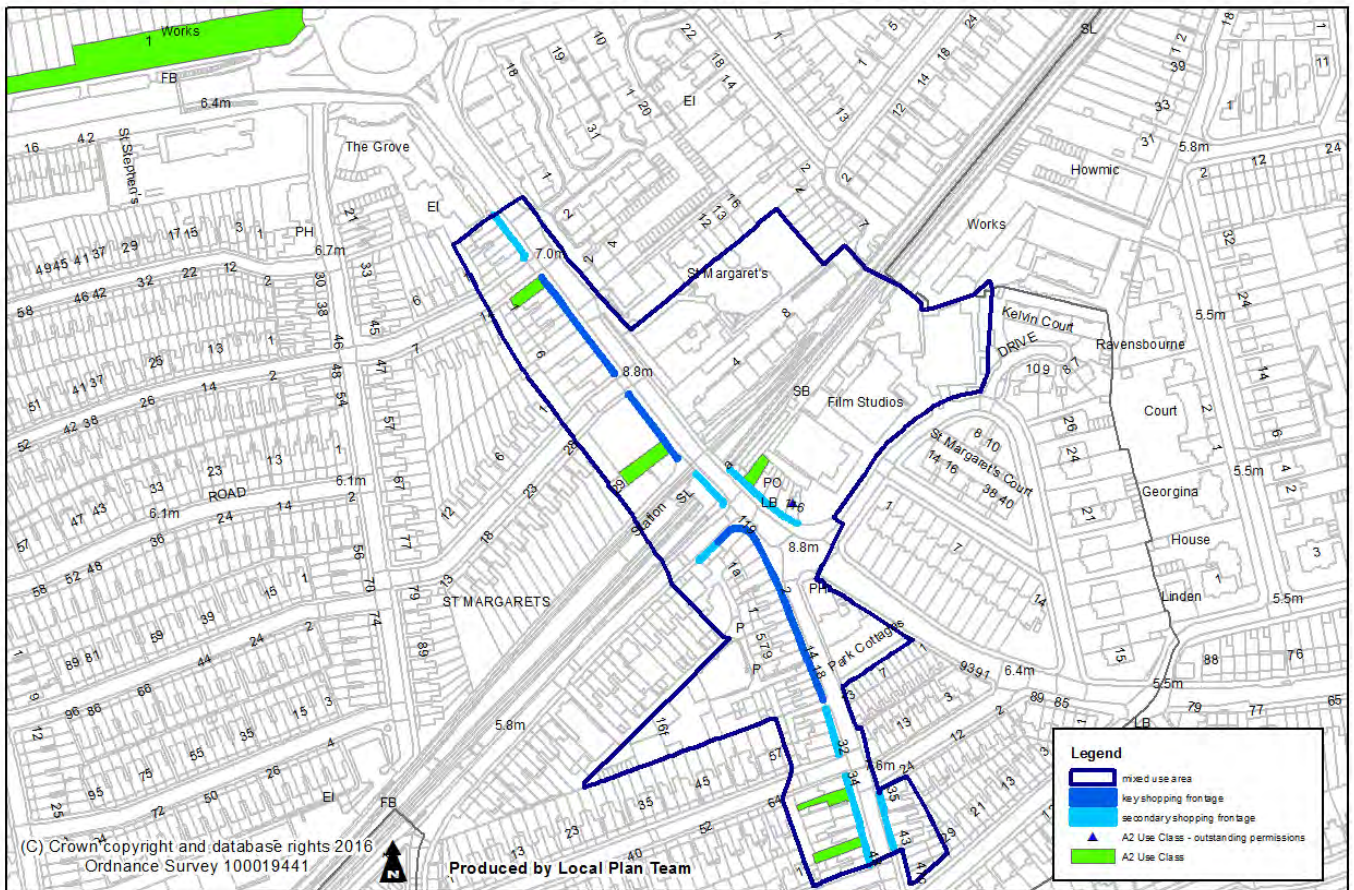
2.9 (a) St Margarets local centre

Table 2.9.1: A2 Uses in St Margarets local centre

| Premise Name | No | Street Address | Description | Local Plan designation |
|---------------------------------------|-------------|-----------------|--------------------|-----------------------------|
| Chase Buchanan | 155 | St Margarets Rd | estate agent | Key shopping frontage |
| Fitzgibbon Residential Letting Agents | 127 | St Margarets Rd | estate agent | Key shopping frontage |
| Antony Roberts | 44 | Crown Road | estate agent | Secondary shopping frontage |
| Chase Buchanan | 124 | St Margarets Rd | Letting Agents | Secondary shopping frontage |
| Snellers | 36 | Crown Road | estate agent | Secondary shopping frontage |
| Globe Financial Services | 1 | Chertsey Road | solicitors | Non-designated frontage |
| Globe Ltd | Globe House | 1 Chertsey Road | financial advisors | Non-designated frontage |
| Dexters | 1 | Chertsey Road | estate agent | Non-designated frontage |

Source: LBRuT Local Plan Team (2015)

Distribution of A2 uses in St Margarets (2015)



2.9.1 The A2 uses are well dispersed throughout St Margarets with the exception of the block 32-110 Crown Road which is primarily key shopping frontage. There are other financial services located in Globe House to the north west of the centre. Approximately 1 in 10 businesses are in A2 use. Numbers of outlets in the property services sector are slightly above the UK average according to GOAD.

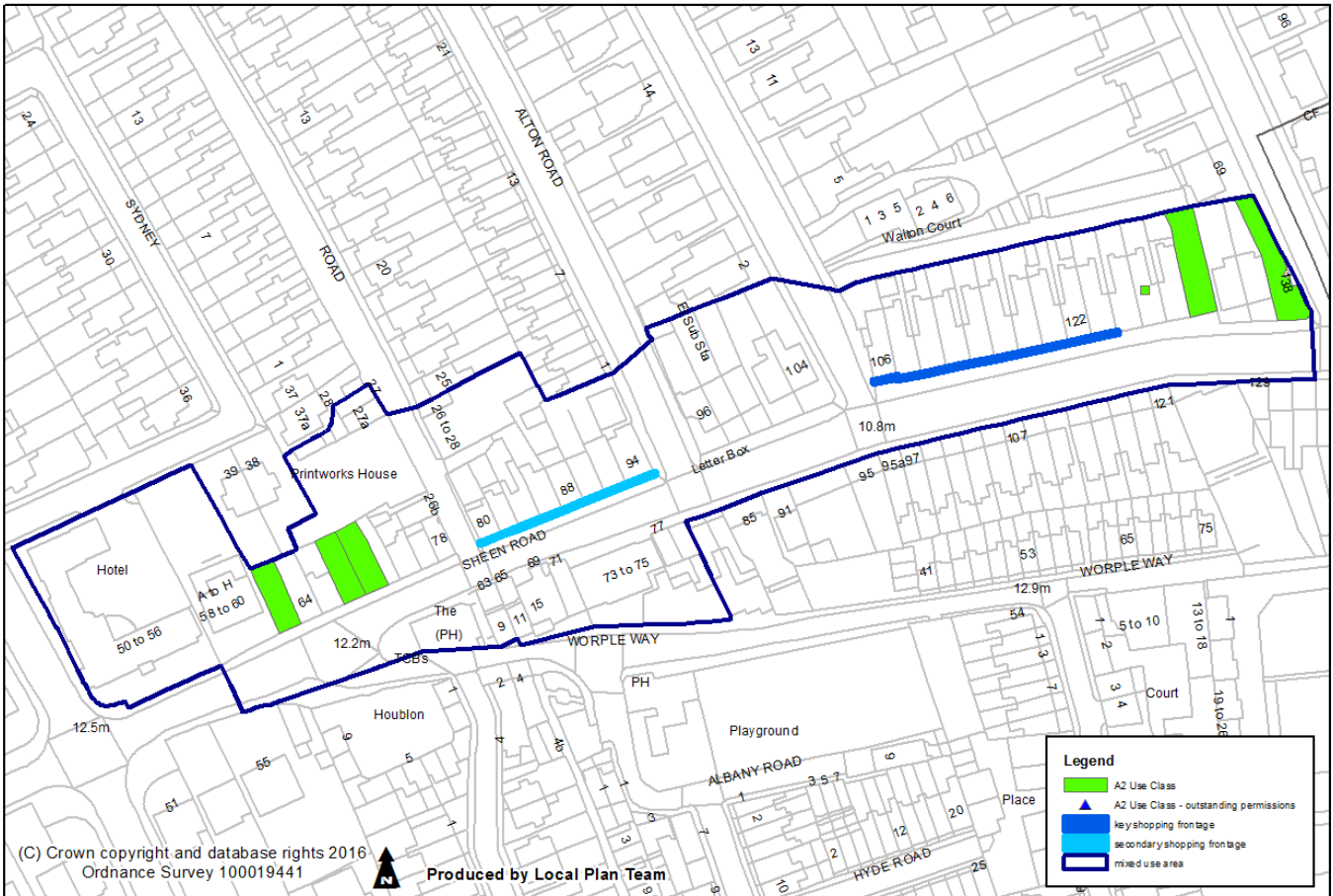
2.10 (a) Sheen Road neighbourhood centre

Table 2.10.1: A2 Uses in Sheen Road neighbourhood centre

| Premise Name | No | Street Address | Description | Local Plan designation |
|-----------------------------|-----|----------------|----------------------------|-------------------------|
| Byrnes Soler and co | 70 | Sheen Road | Accounts/financial service | Non-designated frontage |
| Corporate Letting Company | 62 | Sheen Road | Lettings Agent | Non-designated frontage |
| Cresta Insurance (Swintons) | 138 | Sheen Road | Insurers | Non-designated frontage |
| Fitzgibbon Residential | 128 | Sheen Road | Estate Agents | Non-designated frontage |
| Nightingale Chancellors | 132 | Sheen Road | Estate Agents | Non-designated frontage |
| Vacant | 68 | Sheen Road | Vacant | Non-designated frontage |

Source: LBRuT Local Plan Team (2015)

Distribution of A2 uses in Sheen Road (2015)



2.10.1 15% of Sheen Road neighbourhood centre’s outlets are A2 uses, which is very high proportion compared to other similar centres in the borough and thus why an Article 4 Direction is being considered for a centre at this level in the centre hierarchy. The map above shows that they are located outside of the designated shopping frontages.

2.11 (a) Hampton Village local centre

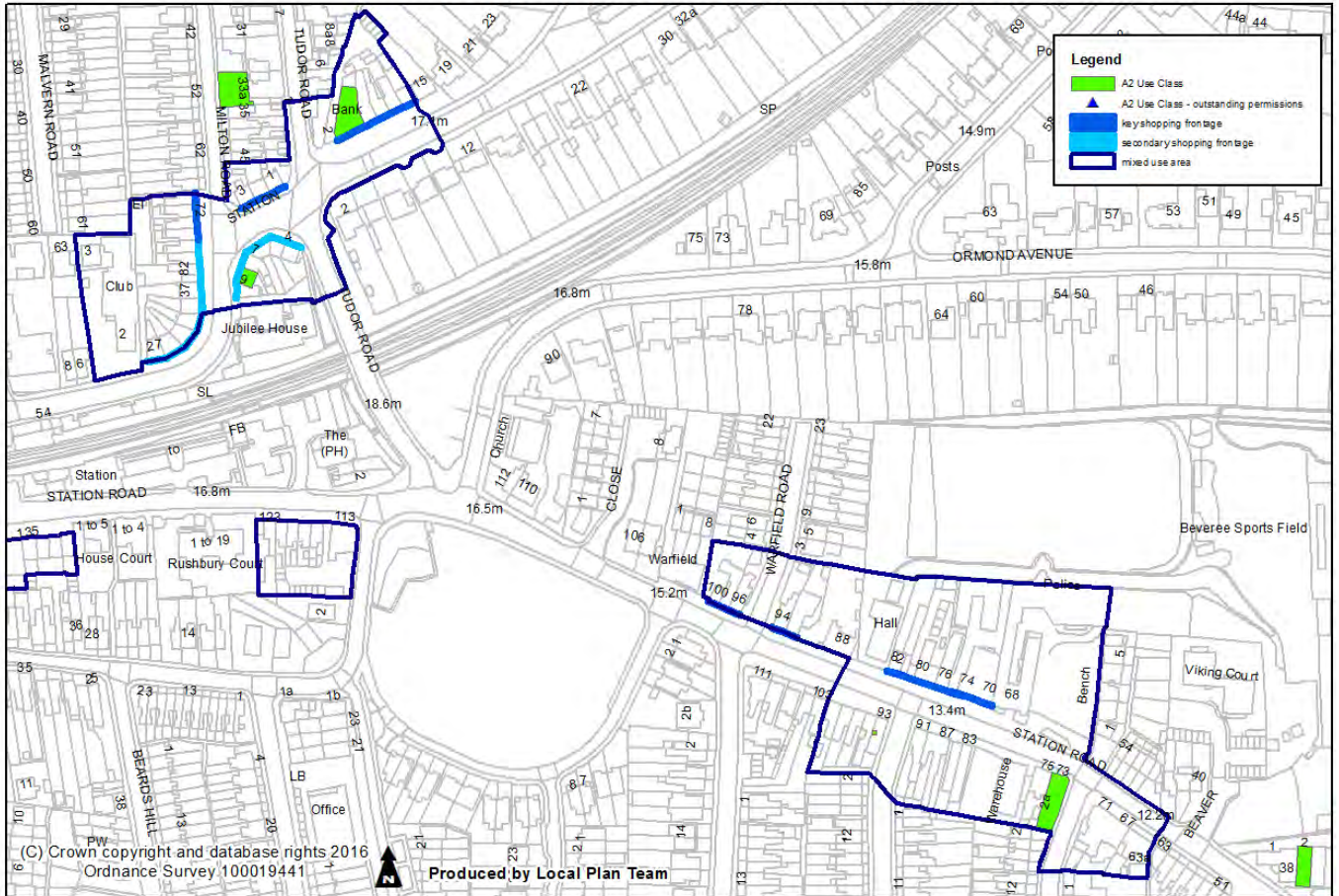
Table 2.11.1: A2 Uses in Hampton Village local centre

| Premise Name | No | Street Address | Description | Local Plan designation |
|------------------------------|-----|------------------|--------------|-----------------------------|
| Lloyds Bank | 1-5 | Wensleydale Road | accountant | Key shopping frontage |
| Village Estates | 8 | Station Approach | Estate Agent | Secondary shopping frontage |
| Business Accounting Services | 33a | Milton Road | Bank | Non-designated frontage |
| Dexters | 93 | Station Road | Estate Agent | Non-designated frontage |
| Treddinick & Bower | 73 | Station Road | Estate Agent | Non-designated frontage |

Source: LBRuT Local Plan Team (2015)

2.11.1 Hampton Village is a dispersed centre with blocks of designated shopping frontage in various locations. The A2 uses are located in the central Area of Mixed Use focused on Milton Road and Wensleydale Road and that on Station Road.

Distribution of A2 uses in Hampton Village (2015)



2.12 (a) Kew Gardens local centre

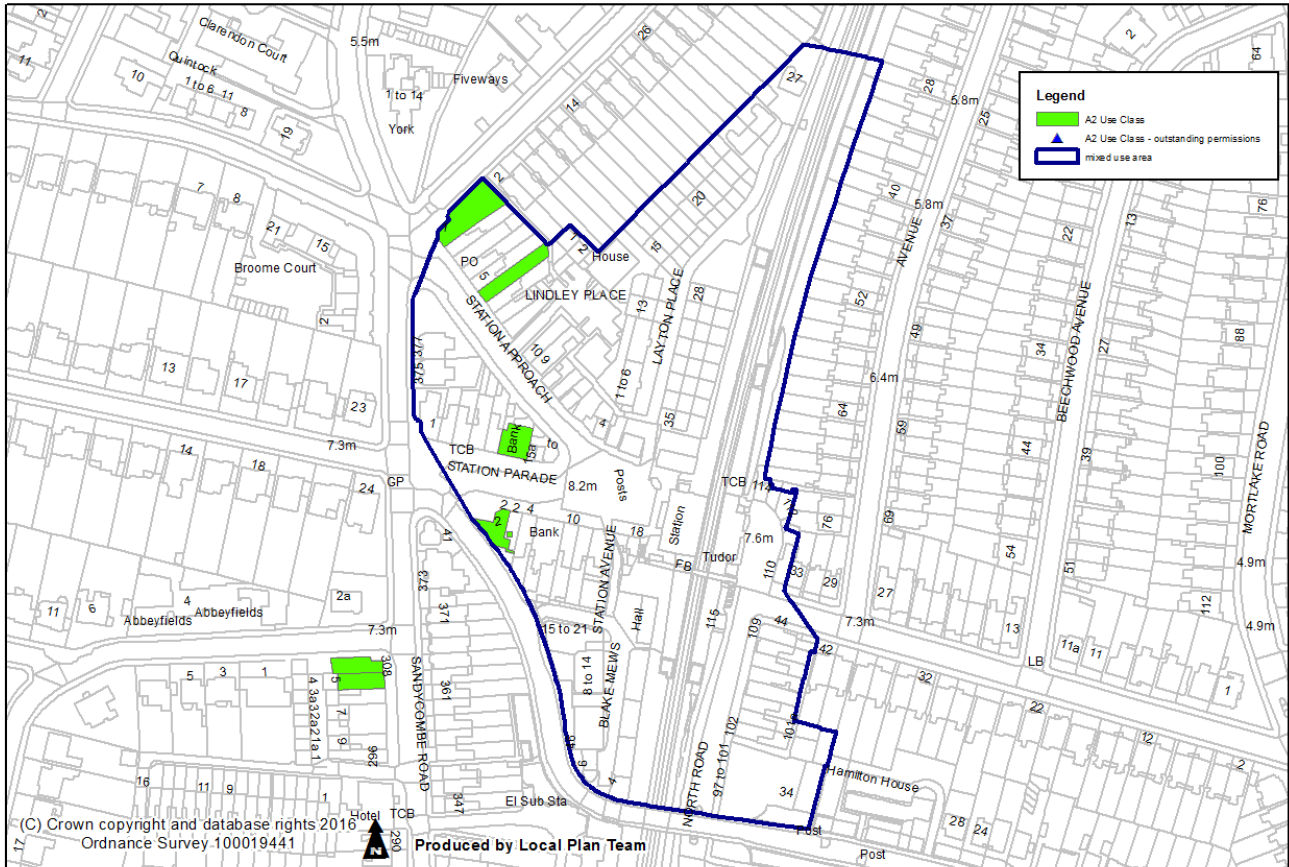
Table 2.12.1: A2 Uses in Kew Gardens local centre

| Premise Name | No | Street Address | Description | Local Plan designation |
|--------------------|-------|-----------------|--------------|-----------------------------|
| Antony Roberts | 2A | Station Parade | Estate Agent | Key shopping frontage |
| Barclays Bank | 11-13 | Station Parade | Bank | Key shopping frontage |
| Featherstone Leigh | 1 | Royal Parade | Estate Agent | Secondary shopping frontage |
| Vacant | 2B | Station Parade | Vacant | Key shopping frontage |
| W Hallett And Co. | 6 | Royal Parade | Estate Agent | Secondary shopping frontage |
| Antony Roberts | 308 | Sandycombe Road | Estate Agent | Secondary shopping frontage |
| Chestertons | 306 | Sandycombe Road | Estate Agent | Secondary shopping frontage |

Source: LBRuT Local Plan Team (2015)

2.12.1 A2 uses are located in both Station Parade & Station Approach, but also in the secondary frontage of Sandycombe Road local parade which is nearby. Approximately 1 in 10 businesses in the centre are A2 uses.

Distribution of A1 & A2 uses in Kew Gardens (2015)



2.13 (a) East Twickenham local centre

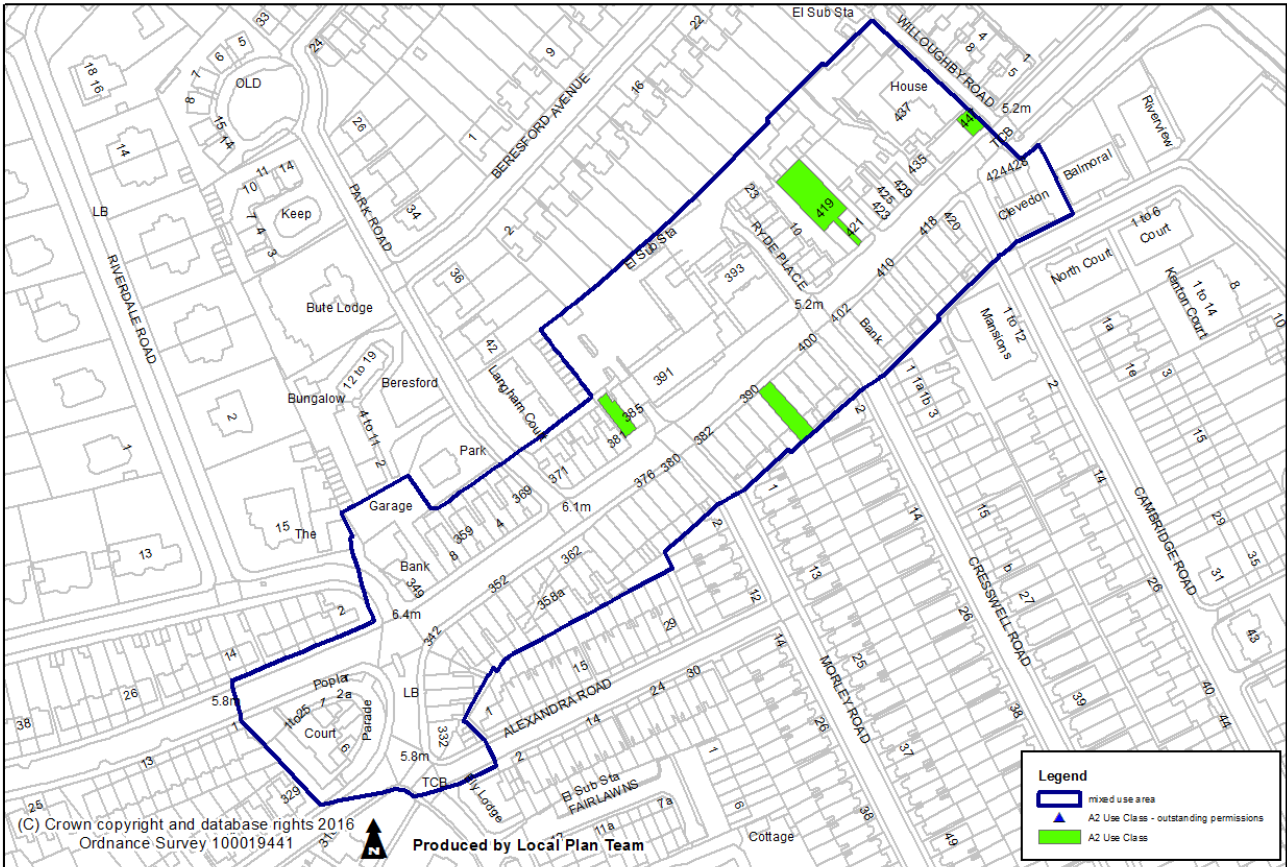
Table 2.13.1: A2 Uses in East Twickenham local centre

| Premise Name | No | Street Address | Description | Local Plan designation |
|-----------------------------|-----------------------|-------------------|--------------|---------------------------------------|
| Jardine & Co. | 392 | Richmond Road | Estate Agent | Secondary shopping frontage |
| Rhode & Co | Richmond Bridge House | 419 Richmond Road | accountant | Secondary shopping frontage - rear of |
| Richmond Bridge Residential | 447 | Richmond Road | Estate Agent | Secondary shopping frontage |
| Vacant | 383 | Richmond Road | Vacant | Secondary shopping frontage |

Source: LBRuT Local Plan Team (2015)

2.13.1 In East Twickenham local centre the A2 uses are clustered to the east of Richmond Road.

Distribution of A2 uses in East Twickenham



2.14 (a) Ham Common local centre

Table 2.14.1: A2 Uses in Ham Common local centre

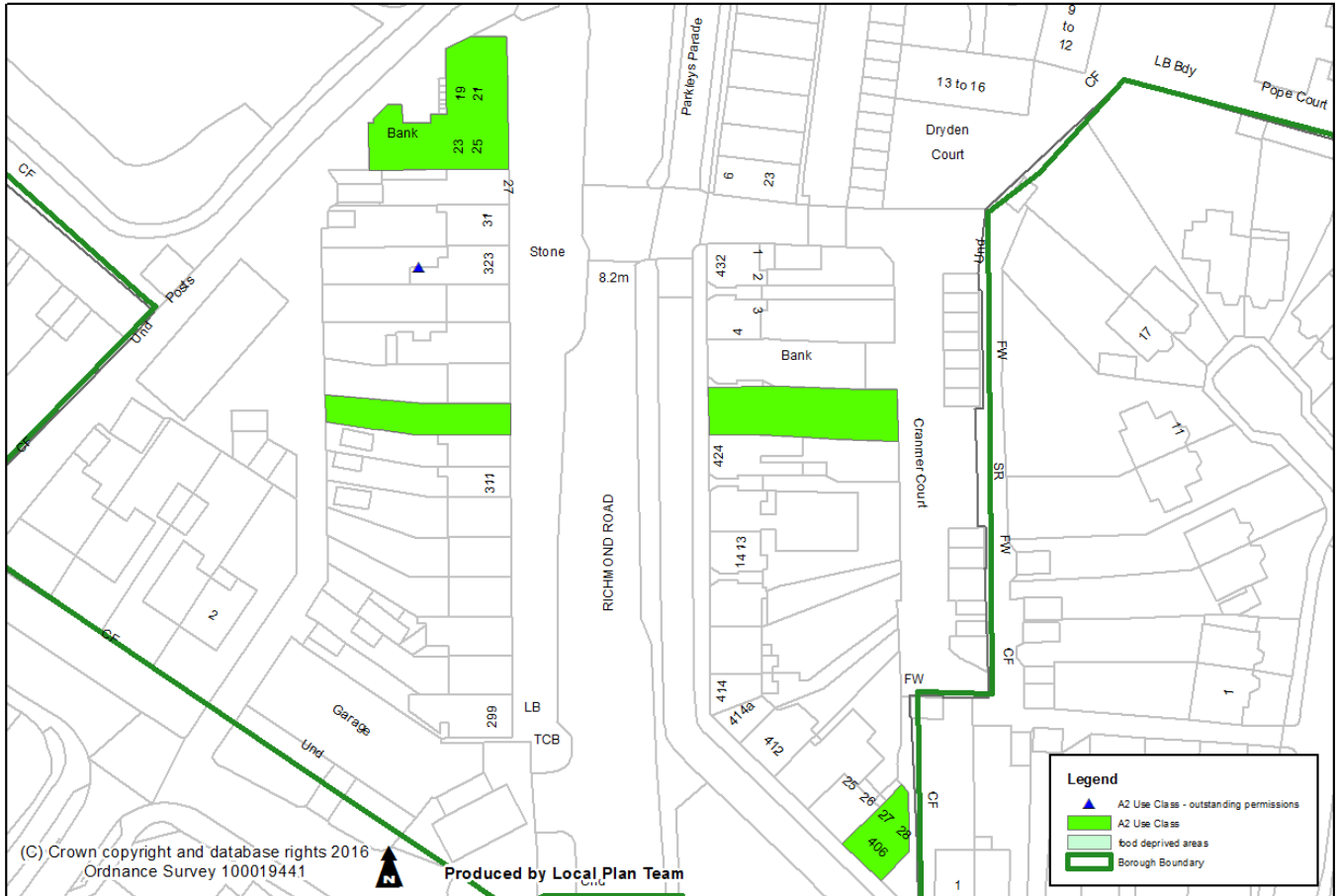
| Premise Name | No | Street Address | Description | Local Plan designation |
|----------------|-------|----------------|--------------------|-----------------------------|
| Curchods | 406 | Richmond Road | Estate Agents | Secondary shopping frontage |
| Gascoigne Pees | 426 | Richmond Road | Estate Agent | Key shopping frontage |
| Mervyn Smith | 315 | Richmond Road | Estate Agent | Key shopping frontage |
| Vacant | 21-25 | Upper Ham Road | Vacant HSBC | Key shopping frontage |

Source: LBRuT Local Plan Team (2015)

Please note that the former HSBC bank is currently being converted into a Sainsburys Local. A Certificate of Lawful Development has recently been issued to convert No 323 Richmond Road into an A2 use as indicated on the map below.

2.14.1 Ham Common local centre provides important local shopping facilities for some residents which are more than 400 metres from convenience provision. Anecdotal evidence suggests that several A2 uses are looking for representation in the centre, and indeed there is one outstanding application for change of use to an estate agent.

Distribution of A2 uses in Ham Common (2015)



3 Outstanding permissions

- 3.1.1 The following table shows that there are currently 7 outstanding permissions for a change of use to an A2 use class at 1/12/2015. This data shows that there are permissions in the pipeline awaiting implementation. Of importance is that subsequent to this change in permitted development rights coming into force on 15th April 2015, the local authority need not be informed in every case of changes of use from an A1 to an A2 Use Class. Further evidence on growth in A2 uses will not be available until the 2016 Town Centre Land Use Survey is undertaken by the Council in the summer of 2016.

Table 3.1: Outstanding permissions at 1/12/2015

| application ref | address | proposal |
|-----------------|---|---|
| 13/0832/FUL | 121 - 125 Heath Road, Twickenham | Proposed use of the ground floor unit to include A1, A2, A3 (134sqm), B1, D1 (Medical/Health Services, Crèche/Day nursery, Museums and Exhibition Space) and D2 use classes. |
| 14/1512/FUL | 7 High Street, Whitton Twickenham, TW2 7LA | Change of Use from vacant A1 Use (Coffee Shop) to A2 Use (Estate Agent). |
| 14/4218/FUL | 116 St Margarets Road Twickenham | Change of use from B1 (Office) use to A2 (Financial and Professional Services) at ground and basement levels incorporating provision of secure cycle storage at basement level. |
| 15/0424/FUL | 115B High Street, Whitton Twickenham, TW2 7LG | Change of use from existing A1 (retail) use to A2 (financial and professional services) use. |
| 14/4537/FUL | Unit 3, Cross Deep Court Heath Road, Twickenham TW1 4AG | Flexible use of premises for A1, A2, A3, B1(a) (Office), D1(Medical/Health Services, Crèche/Day Nursery, Museums and Exhibition Space only) or D2 uses (or a combination of these). |
| 13/4019/FUL | 159 Heath Road, Twickenham, TW1 4BH | Demolition of existing office building with two residential units and erection of a part single, part three, part four storey building providing ground floor commercial uses (A1(non-food retail), A2, B1, D1 & D2) and 21 No. 1 and 2 bedroom flats (6 social |
| 15/1579/PS192 | 23 Hill Street, Richmond TW9 1SX | Change of use of the basement and ground floor from a retail unit (Use Class A1) to an estate agent (Use Class A2). |
| 15/4639/PS192 | 323 Richmond Road | Change of use from A1 to A2 use on ground floor only. |

Source: LBRuT Decisions Analysis System

4 Capacity of centres to absorb new A2 uses

4.1 Health of town centres

- 4.1.1 Describing the distribution of A2 uses across the borough is a key part of this exercise. However, understanding the potential impact of uncontrolled change of use from shops to A2 uses in the borough's centres is also crucial. Richmond upon Thames is atypical in having generally buoyant town centres, with a strong demand for retail in Richmond main centre in particular. The potential loss of key retail units in this borough runs counter to the government's town centre first policy. The potential impact is likely to be negative for the economy and for the community in terms of the erosion of provision of adequate shopping facilities within walking distance of their homes.
- 4.1.2 The NPPF requires that the evidence base includes monitoring of the health of town centres. The Council published Town Centre Health Checks in 2011 (specifically for Twickenham as part of the evidence base for the Twickenham Area Action Plan) and in [2013](#). The latter covered the 5 main town centres and several of the larger local centres in the town centre hierarchy for which there was sufficient information available. This extensive research report is updated annually in part through the publication of centre vacancy rates as reported in the [Authority's Monitoring Report](#). The Nathaniel Lichfield and Partners Retail Study (2014) also includes an Audit of the 5 main centres.
- 4.1.3 The following table summarises the key findings of these reports:

Table 4.1.1: Summary of Health of Centres

| Centre | Health of Centre |
|------------|--|
| Teddington | <ul style="list-style-type: none"> Teddington's mix of business uses is similar to the average for the larger borough centres and is also similar to the UK average, with the exception of a lower vacancy rate than the norm. The number of shops in the centre has remained stable for the last 5 years (2012). With approx. 13,100 m² of retail floorspace it is the second smallest district centre in this respect. The number of shops mirrors the UK average, although the amount of floorspace in the comparison sector is lower. 69% of Teddington's shopping floorspace sells non-food goods and this is more on a par with Whitton than the larger centres of East Sheen, Twickenham, and Richmond. The much larger centre of Kingston is located nearby which has a regional comparison shopping role. Teddington is under-represented in terms of supermarket floorspace compared to the UK average. It has noticeably fewer multiples amongst comparison goods retailers which illustrates its diversity and can be considered a strength. Teddington is an established venue for eating out and drinking. It has a more diverse offer than in other district centres being more evenly spread between the restaurant, café, wine bar & pub sectors (although it is acknowledged that there is overlap in business activities between some sectors) with the exception of the take-away/fast food sector which is more limited The overall picture for Teddington is a positive one. Vacancy rates are regarded as a key indicator of the health of a town centre, and Teddington has had the lowest vacancy rates of any district centre since 2008. At 3.6% in 2015 rates are well below the national average of c.11%. Footfall levels have not fallen as they have in some of the other centres. Generally footfall is higher in Broad Street than in the High Street, especially outside Tesco which is a key anchor. Research undertaken by the Javelin Group suggests that Teddington is well-placed to withstand the recession. Teddington town centre achieves Zone A retail rents slightly lower than in East Sheen. The highest Zone A rents are around £600 per sq.m (source VOA), which are achieved in the High Street. Community facilities have been improved in Teddington as proposal sites have been implemented. Figures show that the overall amount of completed retail floorspace has not |

| Centre | Health of Centre |
|------------|--|
| | <p>significantly increased in the last 5 years (2012).</p> <ul style="list-style-type: none"> Teddington is a pleasant centre which benefits from a high quality public realm. Local residents value the parks and open spaces and shopping facilities in the area. Actual crime in the centre is comparatively low and not on a scale with Twickenham and Richmond but higher than the other district centres. Anti-social behaviour reporting is concerned with littering and to a lesser extent noise. This may be related to its food and drink offer which is reasonably well-developed. <p>In short, most of the indicators support the conclusion that Teddington is a buoyant district centre, which is successful despite its proximity to Kingston.</p> |
| Richmond | <ul style="list-style-type: none"> Richmond's role as a sub-regional centre providing comparison shopping is illustrated by the considerable amount of floorspace in non-food shopping, its mix and the type of businesses present. There is an excellent choice and range of clothing/footwear shops and jewellers. In terms of market sector, many of these outlets are upmarket or upper-middle market e.g. Joseph, Russell & Bromley, Reiss, Hobbs, Ted Baker, TM Lewin and LK Bennett. Richmond town centre has the highest Zone A retail rents in the Borough. The highest Zone A rents are around £2,100 to £2,152.50 per sq.m, which are achieved in George Street. Within The Quadrant Zone A rents are lower at £1,650 per sq.m (Source VOA, 2014). Shop property values are the highest in the Borough, which suggests the viability of development should be the highest in Richmond. Its high quality environment, historic and cultural assets and its mix of multiples and independents give the centre its niche. It already has a wide "destination offer" which goes beyond shopping. It is expected that the majority of forecast retail capacity will be accommodated here, and it is hoped that the comprehensive development of the station site and others which come forward will help retain the centre's position and keep the shopping spend in the borough. In 2012 footfall was lower than in the past with retailers facing a very competitive environment in tough economic times, particularly from the growth in e-tailing. The vacancy rate is considerably lower than the national average which indicates a healthy, vital and viable centre. Low vacancy rates, coupled with an increase in Zone A rents, low levels of charity shops are factors which suggest demand exists. Richmond appears successful as a retail location, certainly compared to other regional and national comparators. <p>Many indicators illustrate Richmond's success and buoyancy.</p> |
| Twickenham | <ul style="list-style-type: none"> Twickenham's role as a district centre is essentially to provide for local shopping needs, including for those without access to a car. It has food shopping provision which is in line with the UK average, but a more limited non-food retail offer. However, it still retains independent retailers in both sectors. It has a strong eating and drinking offer. The centre boasts 40,000ft² of both pubs and restaurants and a further 19,500ft² of cafes, which is a growing sector. This is an important part of its prosperity and no doubt reflects the presence of Twickenham Stadium and Twickenham's role as an employment centre. Vacancy rates are often regarded as a key indicator in assessing the health of centres. The 2013 Town Centre Health Checks Report raised concerns over the fluctuating vacancy level at that time. However, the rate dropped to 8.4% in 2015, below the national average. Colliers International's town centre performance index categorises Twickenham as an "improving centre". Twickenham town centre has the second highest Zone A retail rents in the Borough, after Richmond town centre. The highest Zone A rents are around £750 per sq.m, which are achieved in King Street (source VOA). Within Church Street Zone A rents are lower at £450 to £500 per sq.m. Footfall appears to be falling, certainly in parts of the centre, whilst rising elsewhere. Although crime is relatively low on a regional scale, it is high compared to other borough centres. Much of the anti-social behaviour reporting to the Council is concerned with litter |

| Centre | Health of Centre |
|------------|--|
| | <p>and noise.</p> <ul style="list-style-type: none"> Twickenham has a large number of charity shops compared to other centres in the borough (although this has always been the case). There are fewer multiples in the comparison goods sector although multiples in other sectors are greater than the UK average. Both of these characteristics probably reflect the centre's proximity to Richmond and Kingston. Twickenham has benefited from spending on public realm improvements, including the laying out of the Diamond Jubilee Park and opening up of most of the site for public use, which has improved the centre, and this programme of upgrading continues. Crucially, the Twickenham Town Area Action Plan has been adopted which provides the framework for the further development of the centre which builds on the aspirations for developing Twickenham resulting from several consultation exercises. Shopping in the centre is to be consolidated and encouraged. A number of key sites are likely to be developed in the short term (including the Station and Twickenham Square). The centre has a Business Improvement District. <p>In 2013 data suggested encouraging signs of improvement in terms of the health of the centre, although the picture for Twickenham was more mixed compared to other centres. Since then vacancy levels have dropped and a number of schemes have been largely constructed, including the Former Post Office Sorting site, others on Heath Road are expected. The Council is progressing its plans to develop Twickenham Square which will bring a new focus to the centre and strengthen links with the River Thames.</p> |
| East Sheen | <ul style="list-style-type: none"> East Sheen has more non-food shopping floorspace than the other district centres and the UK average, and is a sector which appears to be growing. Its food shopping offer is under-represented compared to the UK average, and there is less floorspace in this sector than in 2005. The redevelopment of the Waitrose supermarket is a benefit to the centre which has more recently been of interest to Tesco who have opened two smaller format stores. Out-of-centre provision will also serve residents living in this area. The proportion of units which are shops is slightly higher than the average for the larger centres in the borough and although actual numbers of shops have fluctuated over the last decade or so they are currently high and have seen a noticeable increase recently (between 2011 & 2012 land use surveys). We might conclude that food shopping is increasingly being provided for by the main supermarkets and that non-food shopping is potentially a growing sector. The choice of clothing/ footwear and furniture/carpet shops is very good. Overall, the centre has fewer multiple retailers than other similar centres. The data suggest a strong independent comparison retailer offer which helps to differentiate East Sheen from its competition. East Sheen has approximately 35,000m² of floorspace in total. It has a less-well developed food & drink offer than some of the other districts, which is mainly restaurant-based, and to a lesser extent café-based, both growing sectors. It also a strong take-away sector of 1,000m² floorspace, the amount having fallen between 2004 and 2011. Positive signs include the increase in the number of shops in the centre, and the fall in vacancy rates (4.8% in 2015) to less than half the national level. In terms of the quality of the public realm, the centre is clearly affected by traffic and this is unlikely to change, but there is access to open space which is valued by the residents. Actual crime is low, and anti-social behaviour reporting is primarily concerned with litter. East Sheen town centre has the third highest Zone A retail rents in the Borough, after Richmond and Twickenham. The highest Zone A rents are around £650 per sq.m (source VOA), which are achieved in the central section of Upper Richmond Road West. Within the other parts of Upper Richmond Road West Zone A rents range from £330 to £550 per sq.m. Footfall is lower than previously recorded, although future monitoring would be needed to confirm this as a real trend. Whereas the Javelin Group put the centre in the "most robust" category to withstand recession, Colliers International consider the centre to be "degenerating". |

| Centre | Health of Centre |
|---------|---|
| | <p>In 2013 town centre indicators suggested a mixed picture for East Sheen with perhaps some degree of vulnerability. At the time, very recent data on growing shop numbers and falling vacancy rates are positive. Since then vacancy rates have continued to fall and are now well below the national average. East Sheen's role as a comparison goods shopping centre is clearly an important one and the fact that this is a growing sector is also positive. It is expected that most of the retail capacity will arise in the east of the borough due largely to population growth which could help to sustain the centre.</p> |
| Whitton | <ul style="list-style-type: none"> • Whitton is the smallest of the district centres with a food shopping, but relatively limited comparison shopping, role. Food shopping provision is similar to the UK average. Of note is that comparison shopping appears to be on the decline, with numbers of retailers falling across a variety of types of shops in the non-food sector, primarily independents. It has not diversified as fast other similar centres and its food and drink offer is fairly limited, albeit that numbers of cafes have been steadily rising. • At 9% in 2015 vacancy levels are similar to those in 2013 and are marginally higher than in the other district centres in the borough (although below the national average). It has fewer multiples and a higher proportion of charity shops than other district centres. • Whitton achieves the lowest Zone A retail rents when compared with the four other main centres reflecting its more localised role. The highest Zone A rents are £350 per sq.m (source VOA). • Pedestrian flow data show that overall figures are similar to counts taken in 2006. There does seem to be some redistribution of the footfall in the centre, affected by the opening of the Lidl store in Nov 2011. However, Tesco remains the site with the highest footfall. <p>Looking to the future there have been a number of positive developments with the opening of the Lidl store in the former Co-op building which had been underused or vacant for many years. The Sainsbury Local at 53-55 High Street has also opened. Although Whitton is not expected to be a major retail centre, these developments could help to retain shopping spend in the area. In addition, the centre has also benefited from recent spending on public realm improvements.</p> |
| Barnes | <ul style="list-style-type: none"> • Barnes, like other centres has experienced change over the last decade or so and in common with the larger borough centres has seen a fall in shop numbers and a reduced retail offer. Barnes' shopping offer is commensurate with its role as a local centre, and in terms of comparison (non-food shopping) it is similar to the UK average. The number of food shops is smaller than the average, but there is less floorspace (since the centre was surveyed Sainsbury's Local has opened). There is also permission for another potential supermarket. On the whole Barnes provides well for local shopping and has a full range of essential shops and services, and also retains a fishmonger and greengrocer which many other centres have lost. Barnes has a strong independent non-food shopping offer which can be considered strength, helping to distinguish it from other centres and meeting the needs of the largely affluent population it serves. • Barnes has an established restaurant sector, and already has a "destination offer" which is being encouraged generally to widen the role of centres. There has been growth in the number of cafes, and significantly in the number of estate agents in Barnes in recent years. • Vacancy rates are often regarded as a key indicator of the health of town centres. Barnes has had historically very low rates. These rates increased dramatically post 2008 but have been improving since 2010. They are now a very low 2.4% (2015). • Environmental quality is considered to be very high and recent investment is clearly visible and has helped to sustain the existing pleasant environment of Barnes which is rich in historic assets. Anti-social behaviour reporting is low and actual crime is too low for data to be released. <p>The picture is generally a positive one, with Barnes having very low vacancy rates. The continued support and development of the town is encouraged through its active town centre management.</p> |

| | <p>Vacancy rates in main centres 2015:</p> <table border="1"> <thead> <tr> <th>centre</th> <th>Vacancy rate 2015</th> </tr> </thead> <tbody> <tr> <td>Richmond</td> <td>7.3</td> </tr> <tr> <td>East Sheen</td> <td>4.8</td> </tr> <tr> <td>Teddington</td> <td>3.6</td> </tr> <tr> <td>Twickenham</td> <td>8.4</td> </tr> <tr> <td>Whitton</td> <td>9.0</td> </tr> <tr> <td>Barnes</td> <td>2.4</td> </tr> </tbody> </table> <p>Source: LBRuT Town Centre Land Use Survey 2015</p> | centre | Vacancy rate 2015 | Richmond | 7.3 | East Sheen | 4.8 | Teddington | 3.6 | Twickenham | 8.4 | Whitton | 9.0 | Barnes | 2.4 | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-------------------------------------|--|--------|-------------------|----------|-----|-----------------|------|--------------|------|-----------------|-----|------------|-----|---------------------|-----|--------------|-----|------------|-----|-----------------------------|------------|--------|--|--------|------|-----------------|------|--------------|------|-----------------|------|------------|------|---------------------|------|--------------|------|------------|------|-----------------------------|-------------|
| centre | Vacancy rate 2015 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Richmond | 7.3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| East Sheen | 4.8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Teddington | 3.6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Twickenham | 8.4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Whitton | 9.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Barnes | 2.4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Local Centres & Sheen Rd</p> | <p>Below are tables showing key statistics for these smaller centres (with the exception of Barnes) not covered by health check reporting and for which nationally produced datasets are not generally available.</p> <p>Table 2 : Vacancy rates in local centres & Sheen Road neighbourhood centre 2015</p> <table border="1"> <thead> <tr> <th>centre</th> <th>Vacancy rate 2015</th> </tr> </thead> <tbody> <tr> <td>Barnes</td> <td>2.4</td> </tr> <tr> <td>East Twickenham</td> <td>17.1</td> </tr> <tr> <td>Hampton Hill</td> <td>11.4</td> </tr> <tr> <td>Hampton Village</td> <td>5.1</td> </tr> <tr> <td>Ham Common</td> <td>7.0</td> </tr> <tr> <td>Kew Gardens Station</td> <td>5.9</td> </tr> <tr> <td>St Margarets</td> <td>4.5</td> </tr> <tr> <td>Sheen Road</td> <td>4.9</td> </tr> <tr> <td>Local centre average</td> <td>7.8</td> </tr> </tbody> </table> <p>Source: LBRuT Town Centre Land Use Survey 2015</p> <p>Vacancy rates are well below the national average with the exception of East Twickenham where vacancies have increased from 7 in 2014 to 13 in 2015. However, only half of vacant units in East Twickenham are vacant shops. Recent closures including a range of land uses.</p> <p>Table 3: Proportion of A1 shops of total businesses covered by the Survey</p> <table border="1"> <thead> <tr> <th>centre</th> <th>Proportion of outlets in A1 use in designated frontages 2015</th> </tr> </thead> <tbody> <tr> <td>Barnes</td> <td>63.7</td> </tr> <tr> <td>East Twickenham</td> <td>54.9</td> </tr> <tr> <td>Hampton Hill</td> <td>59.2</td> </tr> <tr> <td>Hampton Village</td> <td>56.5</td> </tr> <tr> <td>Ham Common</td> <td>58.8</td> </tr> <tr> <td>Kew Gardens Station</td> <td>56.1</td> </tr> <tr> <td>St Margarets</td> <td>57.1</td> </tr> <tr> <td>Sheen Road</td> <td>81.3</td> </tr> <tr> <td>Local centre average</td> <td>58.4</td> </tr> </tbody> </table> <p>Source: LBRuT Town Centre Land Use Survey 2015</p> <p>Clearly, the majority of commercial occupiers in centres are shops. The importance of the retail sector is especially prominent in Barnes and the neighbourhood centre of Sheen Road.</p> | centre | Vacancy rate 2015 | Barnes | 2.4 | East Twickenham | 17.1 | Hampton Hill | 11.4 | Hampton Village | 5.1 | Ham Common | 7.0 | Kew Gardens Station | 5.9 | St Margarets | 4.5 | Sheen Road | 4.9 | Local centre average | 7.8 | centre | Proportion of outlets in A1 use in designated frontages 2015 | Barnes | 63.7 | East Twickenham | 54.9 | Hampton Hill | 59.2 | Hampton Village | 56.5 | Ham Common | 58.8 | Kew Gardens Station | 56.1 | St Margarets | 57.1 | Sheen Road | 81.3 | Local centre average | 58.4 |
| centre | Vacancy rate 2015 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Barnes | 2.4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| East Twickenham | 17.1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hampton Hill | 11.4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hampton Village | 5.1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ham Common | 7.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kew Gardens Station | 5.9 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| St Margarets | 4.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sheen Road | 4.9 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Local centre average | 7.8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| centre | Proportion of outlets in A1 use in designated frontages 2015 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Barnes | 63.7 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| East Twickenham | 54.9 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hampton Hill | 59.2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hampton Village | 56.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ham Common | 58.8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kew Gardens Station | 56.1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| St Margarets | 57.1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sheen Road | 81.3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Local centre average | 58.4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

Sources: Extracts from LBRuT 2013 Town Centre Health Checks,
LBRuT 2015 Town Centre Land Use Survey
NLP, Retail Study, Dec 2014

4.2 Retail need & location of retail allocations

- 4.2.1 The Council commissioned Consultants Nathaniel Lichfield & Partners to produce a Retail Study⁵ which looked at the future need for shopping floorspace across the borough. It updated earlier research carried out by GVA Grimley in 2006. Local authorities are required to produce such studies regularly so that they can ensure there is enough retail floorspace in their areas as set out in the NPPF.

5

http://www.richmond.gov.uk/home/services/planning/planning_policy/local_plan/local_development_framework_research/retail_study_march_2006.htm

- 4.2.2 The study is primarily a quantitative exercise which forecasts how much shopping floorspace is required. Key elements are estimating future population growth and available spending. Other factors are taken into account, including the expected growth in internet shopping. A telephone survey was undertaken to establish current shopping patterns (1,000 responses). Forecasts for food & non-food shopping were produced, and also for food and drink floorspace in Use Classes A3-A5. Capacity is estimated for each of the 5 main centres in the borough and also for the remainder of the borough outside of the 5 centres.
- 4.2.3 This Study assumes that market shares are maintained and that existing shopping patterns remain largely unchanged.
- 4.2.4 The following table is an extract from the Retail Study and summarises the floorspace projections on a centre by centre basis.

Table 4.2.2: Summary of Floorspace Projections 2024 (sq.m gross)

| Centre | Retail floorspace | | | Use Class A3/A4/A5 | Total |
|--------------|-------------------|---------------|---------------|--------------------|---------------|
| | Convenience | Comparison | All retail | | |
| Richmond | 1,488 | 5,531 | 7,019 | 2,884 | 9,903 |
| Twickenham | 670 | 1,588 | 2,258 | 923 | 3,181 |
| Teddington | -131 | 1,180 | 1,311 | 1,013 | 2,062 |
| East Sheen | 670 | 278 | 948 | 509 | 1,457 |
| Whitton | -107 | 791 | 898 | 170 | 854 |
| Other LBRuT | 1,102 | 2,141 | 3,243 | 1,012 | 4,255 |
| Total | 3,692 | 11,508 | 15,200 | 6,512 | 21,712 |

Source: Table 7.1, NLP, Retail Study, Nov 2014. Note All Retail column added.

- 5.2.6 Richmond town centre is expected to take almost a half of the borough's retail floorspace requirement. All the district centres have a contribution to make to this need and as a result retention of existing retail is important to fulfilling this requirement.
- 5.2.7 The following are allocations which may include a retail/leisure element depending on detailed consideration of the site at the planning application stage.

Table 4.2.3: Emerging and adopted allocations which may include a retail (Use Classes A1 and/or A3-A5) element.

| Centre | Allocation |
|-------------|---|
| Richmond | Richmond Station |
| Twickenham* | TW1 - Post Office Sorting [built out] TW3 – Regal House TW4 – York House Gardens TW5 – Garfield Road, Telephone Exchange TW6 – Police Station TW7 - Twickenham Riverside |
| Teddington | Teddington Delivery Office Teddington Telephone Exchange |
| East Sheen | [Stag Brewery] |
| Whitton | Telephone Exchange |
| Other LBRuT | Ryde House, East Twickenham Mortlake and Barnes Delivery office Stag Brewery Hampton Square Hampton Traffic Unit |

* In Twickenham allocations are included in the adopted Twickenham Area Action Plan, elsewhere allocations are emerging.

5 Summary & recommendations for centres

5.1 Distribution of A2 uses in relation to designated frontages

Table 5.1.1: Percentage of A2 uses located in designated shopping frontages in the borough (2015)

| Local Plan frontage designation* | number of businesses in A2 use | % of uses** |
|----------------------------------|--------------------------------|-------------|
| Key shopping frontage | 70 | 33.5 |
| Secondary Shopping frontage | 68 | 32.5 |
| Total designated frontage | 138 | 66 |

Source: LBRuT, Local Plan Team, Town Centre Land Use Survey 2015

Notes:

* does not include properties on the upper floors of to which policy DMTC3 does not apply

**as a proportion of all town centre businesses covered by the dataset (2015)

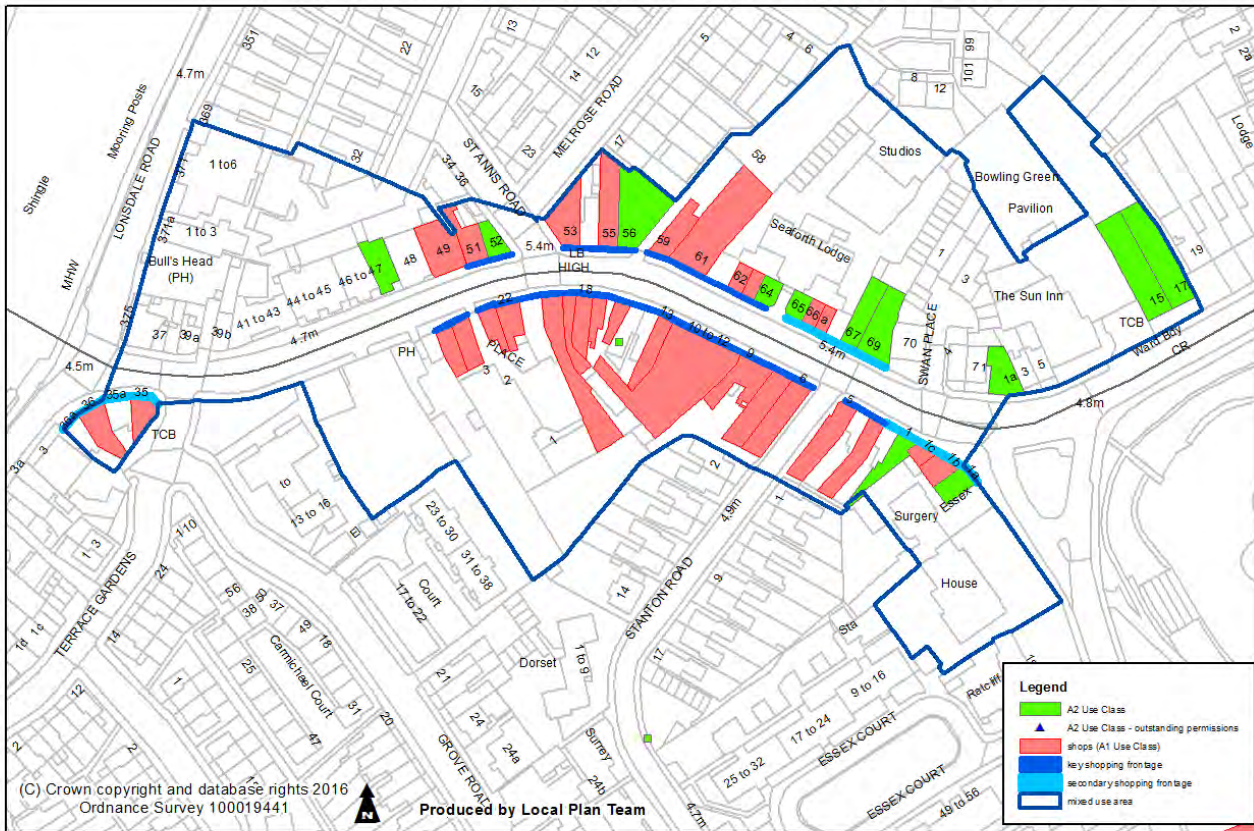
Table 5.1.2: Percentage of A2 uses in designated shopping frontages in individual centres (2015)

| Name of centre | key shopping frontage | | secondary shopping frontage | | total designated frontage | |
|------------------|-----------------------|---------------------|-----------------------------|---------------------|---------------------------|---------------------|
| | number of A2 uses | %age of total units | number of A2 uses | %age of total units | number of A2 uses | %age of total units |
| Richmond | 14 | 40.0 | 14 | 40.0 | 28 | 80.0 |
| Twickenham | 12 | 41.4 | 11 | 37.9 | 23 | 79.3 |
| East Sheen | 11 | 44.0 | 7 | 28.0 | 18 | 72.0 |
| Teddington | 10 | 47.6 | 5 | 23.8 | 15 | 71.4 |
| Barnes | 8 | 44.4 | 6 | 33.3 | 14 | 77.8 |
| Hampton Hill | 0 | 0.0 | 8 | 72.7 | 8 | 72.7 |
| Whitton | 1 | 9.1 | 4 | 36.4 | 5 | 45.5 |
| St Margarets | 2 | 25.0 | 3 | 37.5 | 5 | 62.5 |
| Sheen Road | 1 | 14.3 | 0 | 0.0 | 1 | 14.3 |
| Hampton Village | 1 | 20.0 | 1 | 20.0 | 2 | 40.0 |
| Hampton Wick | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Kew Gardens | 3 | 60.0 | 2 | 40.0 | 5 | 100.0 |
| East Twickenham | 0 | 0.0 | 3 | 75.0 | 3 | 75.0 |
| Ham Common | 3 | 75.0 | 1 | 25.0 | 4 | 100.0 |
| Crown Road | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Hampton Road | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Sandycombe Road | 0 | 0.0 | 2 | 4.7 | 2 | 4.7 |
| Stanley Road | 1 | 2.2 | 0 | 0.0 | 1 | 2.2 |
| Kew Green | 1 | 5.3 | | 0.0 | 1 | 5.3 |
| Castelnau | 1 | 4.2 | 0 | 0.0 | 1 | 4.2 |
| Kew Road | 0 | 0.0 | 1 | 2.9 | 1 | 2.9 |
| Strawberry Hill | 1 | 7.1 | 0 | 0.0 | 1 | 7.1 |
| Twickenham Green | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| White Hart Lane | 1 | 1.7 | 0 | 0.0 | 1 | 1.7 |

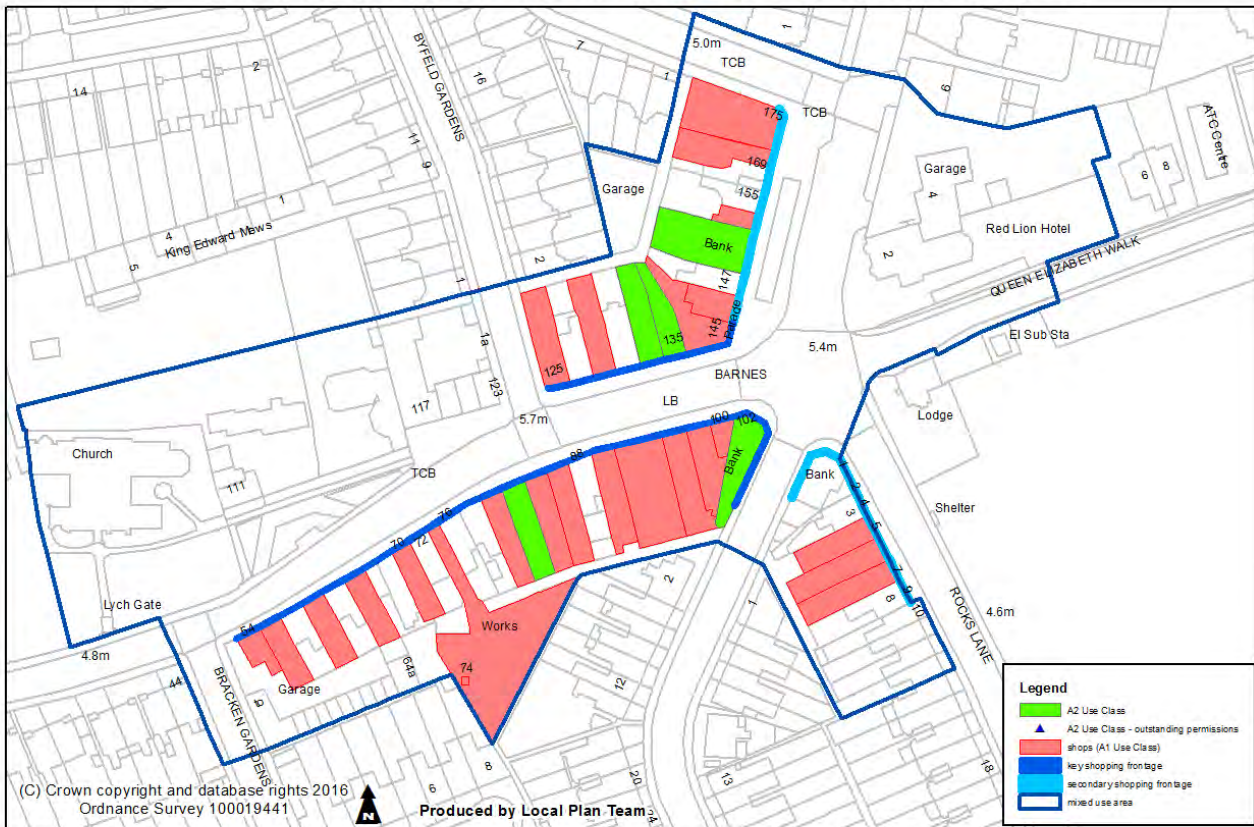
Source: LBRuT, Local Plan Team, Town Centre Land Use Survey 2015

5.2 (a) Barnes High Street

Distribution of A1 & A2 uses in Barnes High Street (2015)



Distribution of A1 & A2 uses in Church Road/ Castelnau, Barnes (2015)



- 5.2.1 Barnes is one of the few centres where the proportion of designated key shopping frontage has been extended in the past, in part at the request of the business community due to the need to protect retail in this buoyant centre. Indeed, a community-led campaign to protect a shop located outside of designated frontage was launched recently such is the strength of feeling on this issue. There has been a noticeable increase in estate agents in Barnes in recent years, resulting in a clear over-concentration of such uses in the High Street end of the centre. The proliferation of estate agents was an issue raised during consultation as part of the Village Planning process. The map above illustrates that there is still considerable scope to extend this trend further, especially on the south side of Barnes High Street. This stretch includes the Sainsbury's Local which is currently the centre's only sizable convenience store⁶.
- 5.2.2 Comparison with the national average suggests that there is considerable over concentration of businesses and floorspace in the property services sector in Barnes. The centre has a vacancy rate well below the national average and very high environmental quality.
- 5.2.3 Barnes, as a local centre, does not have a significant role in meeting the borough's forecast retail need as the strategy is to steer major retail development into the 5 main town centres. It is however, by far the largest of the local centres and has a full range of essential shops and services. It functions well in meeting local shopping needs and providing services to the public. It also has a strong food and drink sector and is an established destination offer. The overall assessment of the health of the centre is positive.

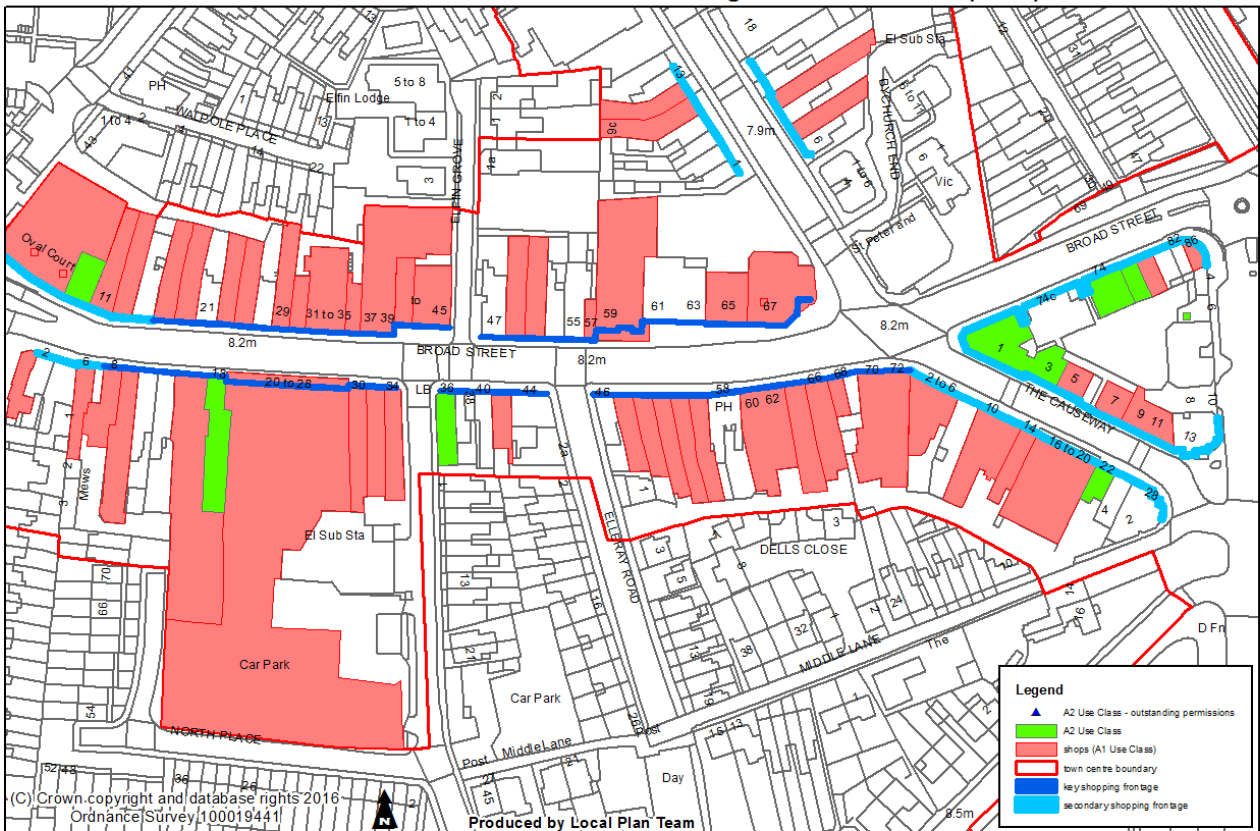
Recommendations

- 5.2.4 Due to the over-concentration of A2 uses in Barnes High Street it is considered appropriate to include the majority of the designated shopping frontage in the High Street within the boundary of an Article 4 Direction. With regard to the Church Road/ Castelnau end of the centre, it is recommended that an Article 4 Direction would include the key shopping frontage and thus contribute to protecting the shopping function of Barnes.

⁶ Foodstore as yet unimplemented.

5.2 (b) Teddington

Distribution of A1 & A2 uses in Teddington - Broad Street (2015)



Distribution of A1 & A2 uses in Teddington - High Street (2015)



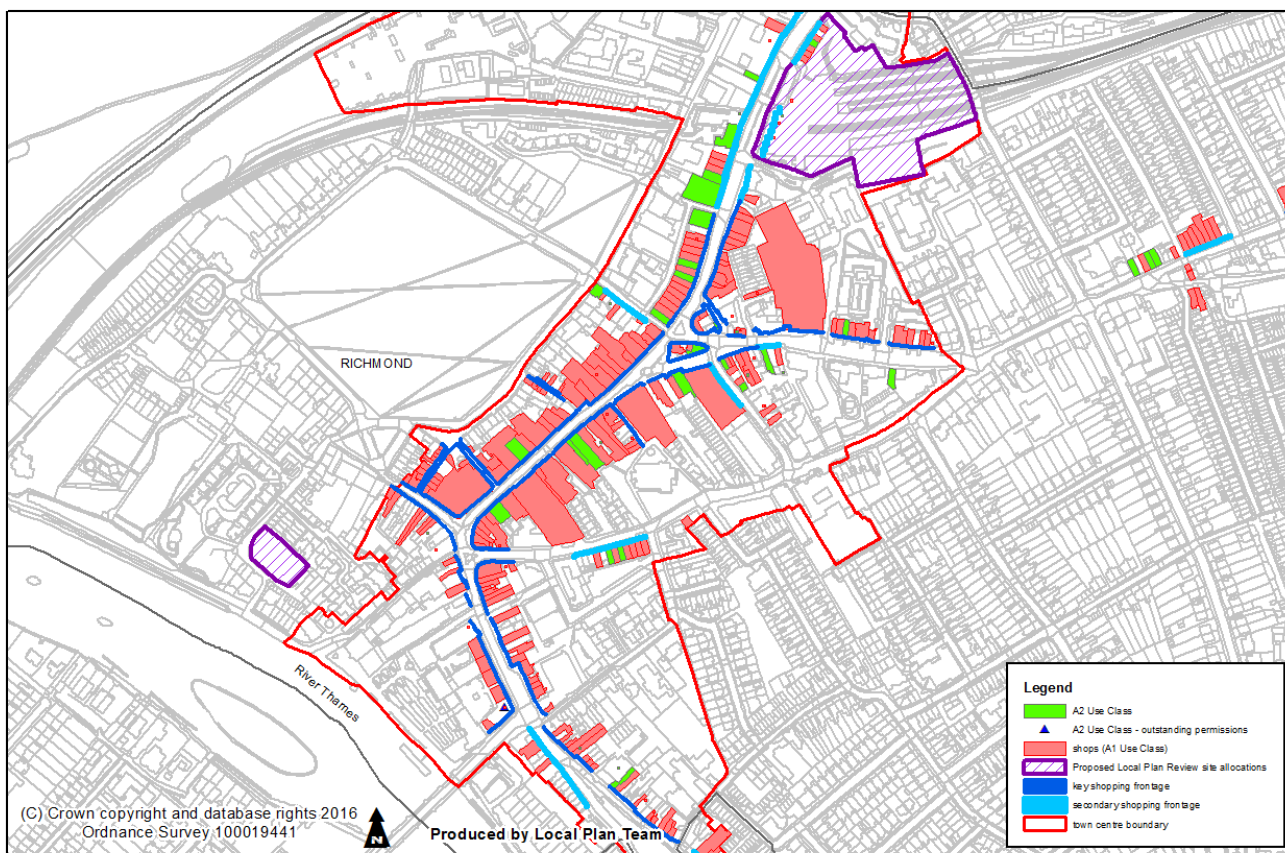
5.2.5 Section 4.2 provides detail on the buoyancy of the town centre. Research concludes that Teddington is regarded as a healthy town centre. It has an extremely low vacancy rate. The Retail Study (Nov 2014) forecasts that the centre could provide 1,300m² of retail (A1) space by 2024⁷. Therefore, this buoyant centre has a role to play in meeting the borough’s retail needs. The Retail Study states that there is little capacity for retail need to be met in vacant units in Teddington. There are 2 sites in the High Street end of the centre which are allocated to deliver the identified retail need in this area.

Recommendations

5.2.6 It is recommended that permitted development rights for change of use from A1 to A2 be removed to protect the retail function of this district centre. An Article 4 Direction should cover the key shopping frontage on both Broad Street and the High Street.

5.2 (c) Richmond town centre

Distribution of A1 & A2 uses in Richmond town centre (2015)



5.2.7 The map above shows A2 uses are dispersed throughout the centre. However, there is a noticeable concentration in the Quadrant and currently fewer such uses to the south of the centre on Hill Street/Hill Rise & Richmond Hill.

5.2.8 Section 4 provides detail on the buoyancy of the town centre. Richmond is regarded as a healthy town centre with rising demand for retail and low vacancy rates and is rated highly on a number of different nationally produced indices. The Retail Study estimates that the centre could provide approximately 10,000m² of retail space (A1, A3, A4 and A5 Use Classes), of which approximately 7,000m² is shopping floorspace. This is approximately half of the retail floorspace required for the borough as a whole. Therefore, this buoyant centre has a significant role to play in meeting the borough’s retail needs. Sites in this centre are restricted by its considerable heritage assets and by its environment & geography; namely the Green and the River Thames. The need to retain retail is paramount. In addition, the Retail Study suggests that there is leakage

⁷ This figure is gross & does not include the A3,A4 or A5 forecast

of expenditure from the borough to neighbouring centres. Larger metropolitan centres particularly Kingston and also Hounslow are planning for significant increase in retail.

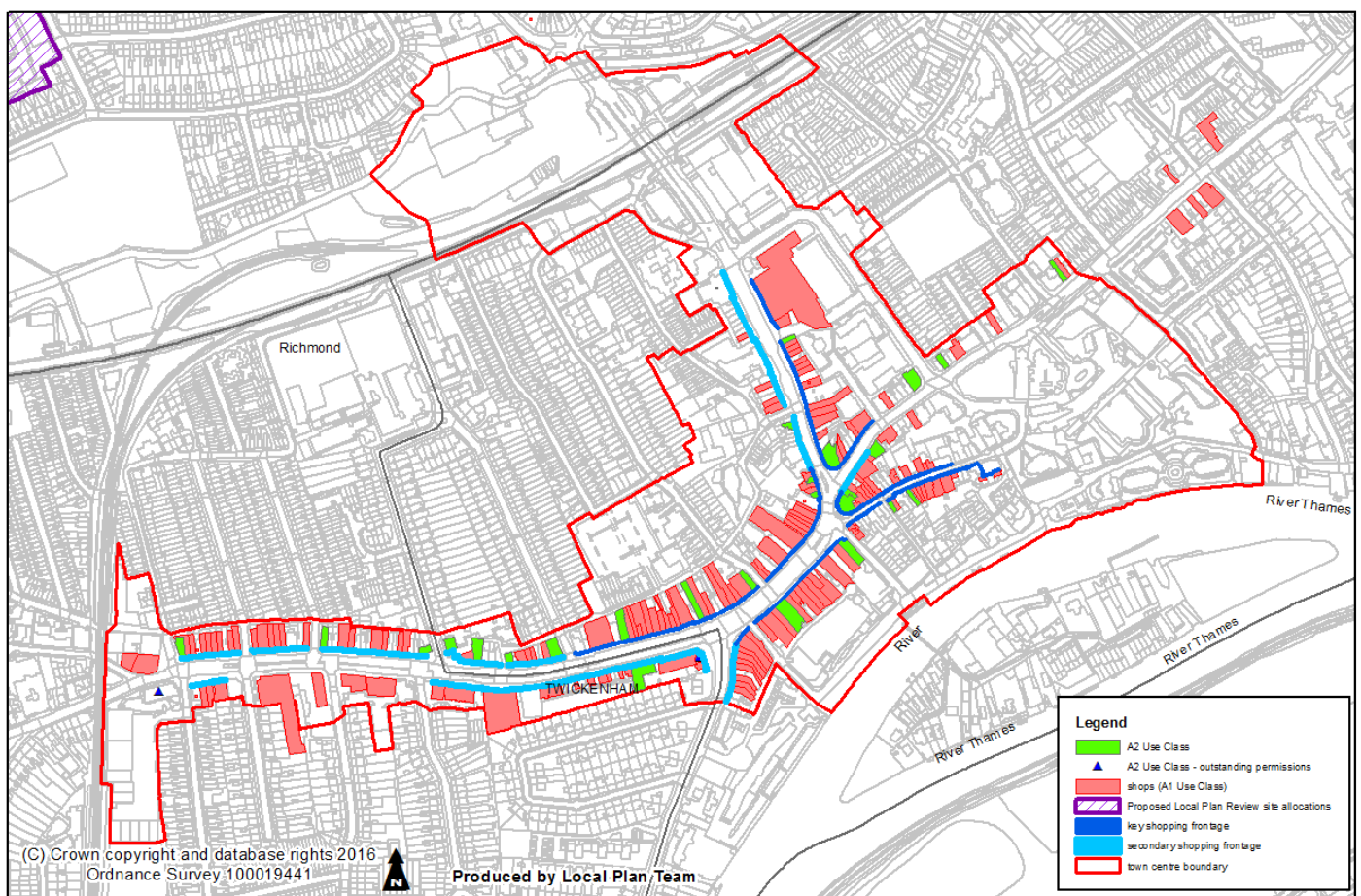
5.2.9 It is also noted that there has been interest from A2 uses seeking properties in prominent sites, Metrobank seeking representation in the Dome Buildings, and other A2 uses seeking sites in the key shopping frontage of the Quadrant & Hill Street.

Recommendations

5.2.10 It is recommended that the area to be covered by an Article 4 Direction in this centre should extend to cover the majority of the key shopping frontage and a small part of the secondary shopping frontage in the Quadrant where concentrations of A2 uses are high, to protect the retail function of the borough’s largest centre with a sub-regional role.

5.2 (d) Twickenham town centre

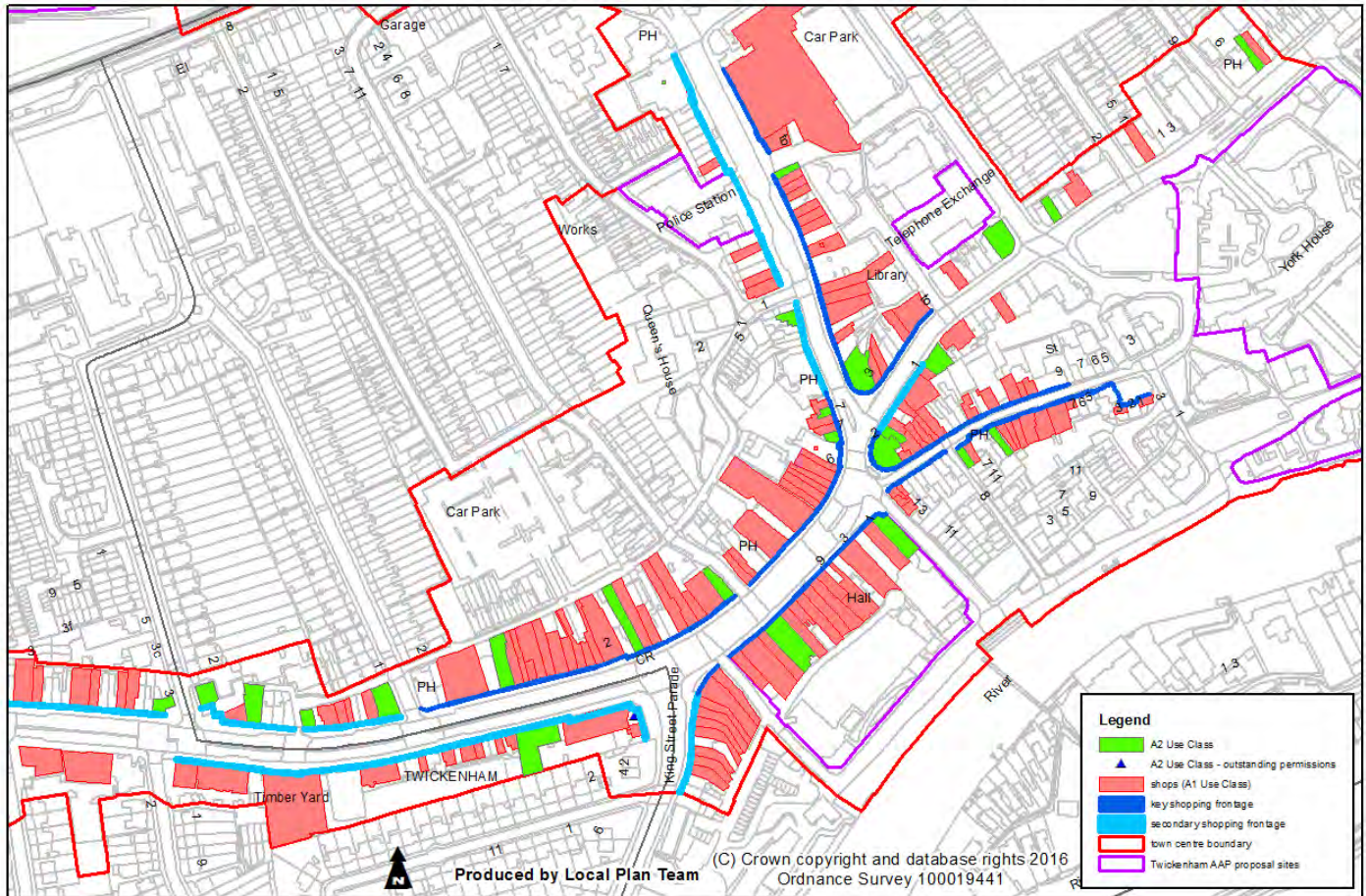
Distribution of A1 & A2 uses in Twickenham town centre (2015)



5.2.11 Twickenham town centre has the second largest number of A2 uses, reflecting its size. They are dispersed throughout the more central parts of Twickenham and parts of the northern side of Heath Road. Numbers of outlets are slightly above the typical UK average centre according to GOAD. Twickenham’s vacancy rate has fluctuated. However in 2015 at 8.4%, it was below the national average.

5.2.12 Of significance is that Twickenham is expected to contribute towards meeting the borough’s retail need as forecast by the Council’s consultants. Site allocations have been made to meet this need in the adopted Twickenham Area Action Plan.

Distribution of A1 & A2 uses in Twickenham town centre - central area (2015)



Recommendations

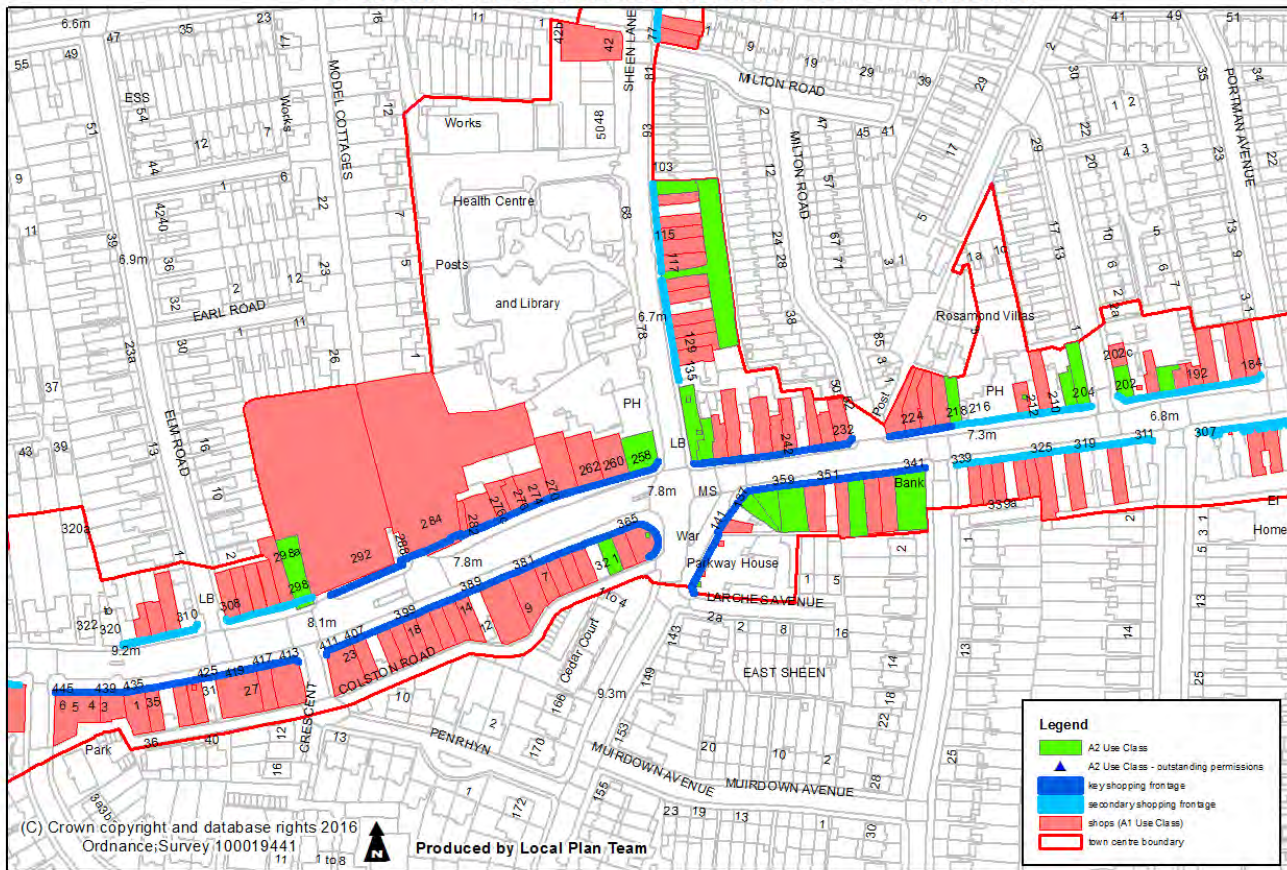
5.2.13 It is recommended that permitted development rights for change of use from A1 to A2 be removed to protect the retail function of this district centre. An Article 4 Direction should cover key shopping frontage and secondary shopping frontage on parts of Heath Road where there are existing concentrations of A2 use and parts of London Road including the site allocation for Twickenham Police Station (site TW6).

5.2 (e) East Sheen town centre

5.2.14 The 2013 Town Centre Health Checks presented a mixed picture for East Sheen. However, the very latest GOAD data show that the positive emerging trends evident in 2012 have continued. Notably vacancy rates have fallen and in 2015 were less than half the national average. East Sheen as a district centre performs an important community role for residents. Its comparison goods sector has continued to grow between 2012 & 2015.

5.2.15 Of importance is that the Retail Study forecast a need for 1,000 m2 of retail space in the centre. It therefore has an important role to play in meeting retail need.

Distribution of A1 & A2 uses in East Sheen - central area



Recommendations

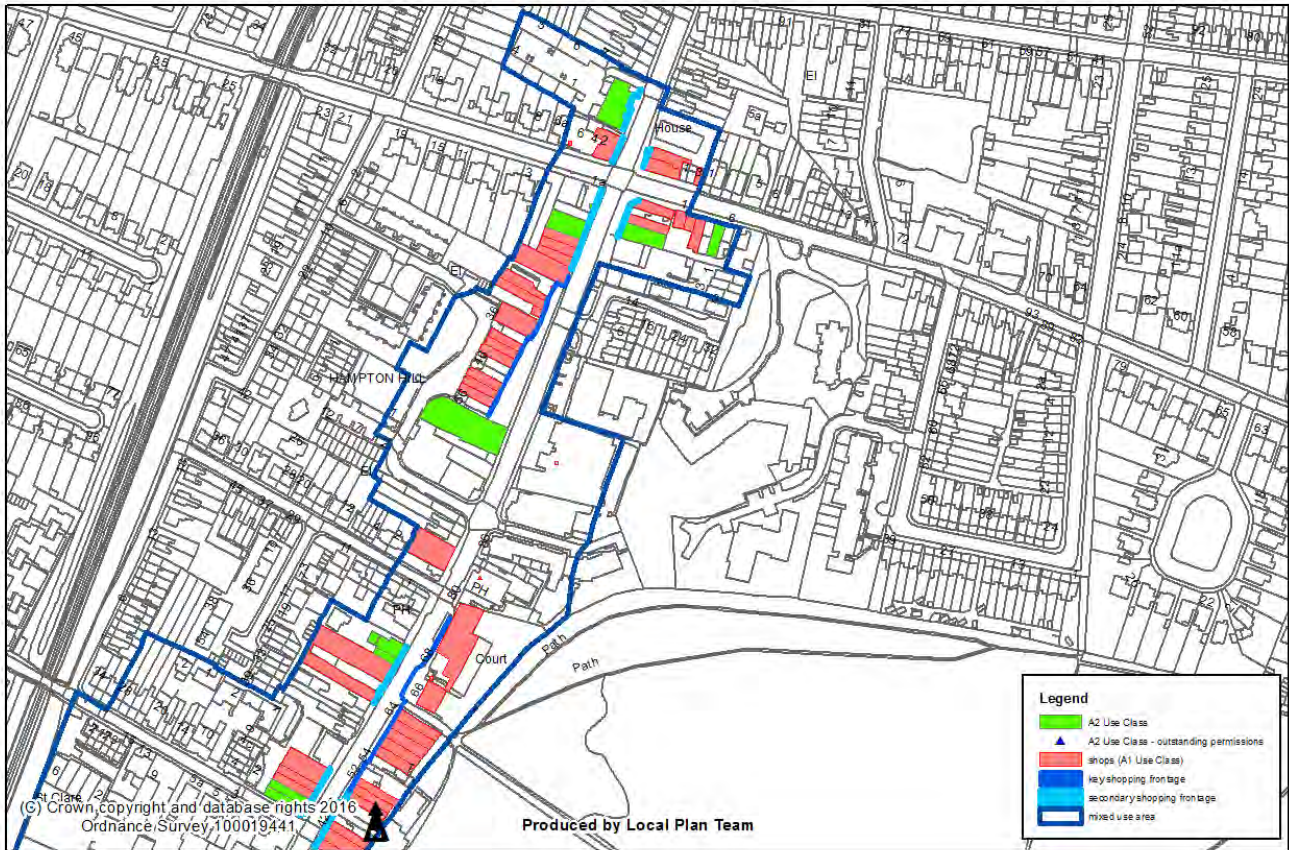
5.2.16 It is recommended that permitted development rights for change of use from A1 to A2 be removed to protect the retail function of this district centre. An Article 4 Direction should cover East Sheen’s key shopping frontage and a limited amount of secondary frontage contiguous with the key shopping frontage in central locations: the first block on Sheen Lane and blocks immediately to the east and west of key shopping frontage on the Upper Richmond Road West.

5.2 (f) Hampton Hill – north of centre

5.2.17 The map below shows the agglomeration of A2 uses to the north of Hampton Hill local centre, approximately three quarters of which are located in secondary shopping frontage. The map also shows the location of the centre’s 2 blocks of key shopping frontage which are dominated by A1 uses.

5.2.18 Centre vacancy rates are commensurate with the national average. The centre has seen investment with the opening of the Sainsburys Local in recent years. The Retail Study does not provide forecasts specifically for local centres below district centre level in the Borough’s retail hierarchy.

Distribution of A2 & A1 uses in Hampton Hill - north of centre (2015)



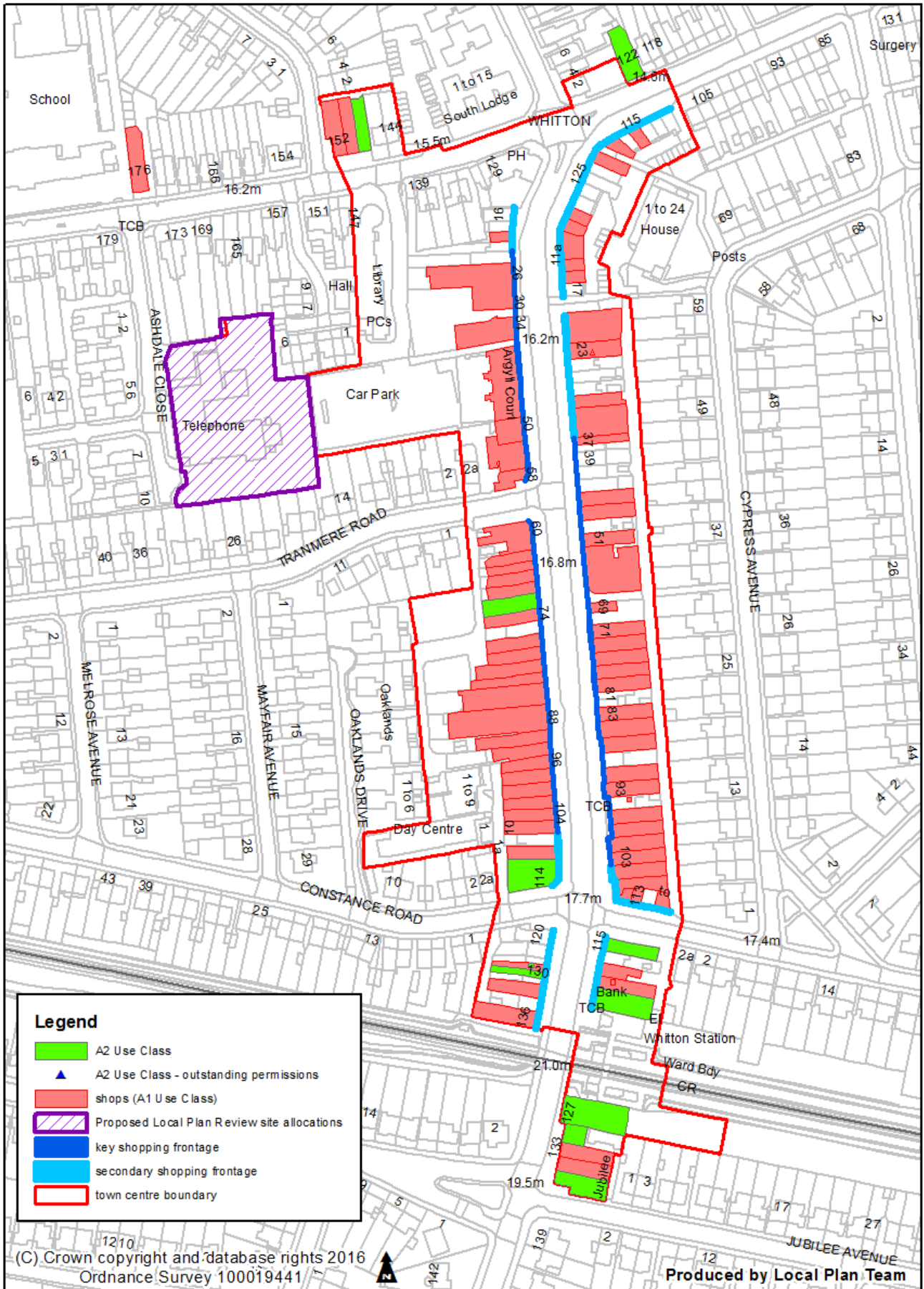
Recommendations

5.2.19 Most of the centre’s convenience shops are located in the 2 blocks of key shopping frontage. It is recommended that a tightly defined boundary encompassing the north of the centre be covered by an Article 4 Direction which includes these 2 blocks. This would leave considerable scope for diversification elsewhere in the centre.

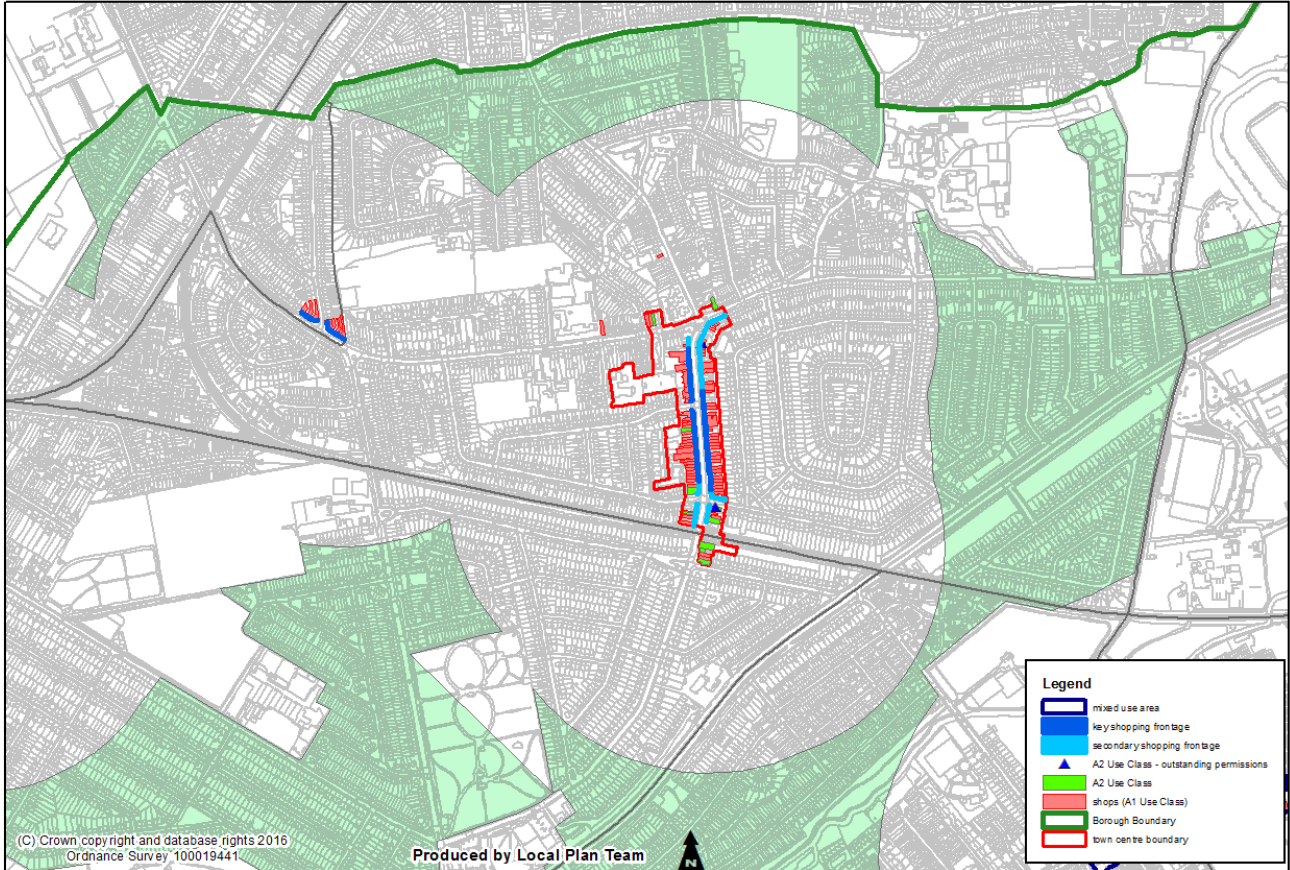
5.2 (g) Whitton town centre

5.2.20 The majority of the A2 uses in Whitton are not located in key shopping frontage. However, there is a need to protect the retail function of this district centre. The proportion of A1 uses (shops) has fallen significantly in Whitton since 1997 when 65.6% of businesses in the centre were in A1 use compared to 53.7% in 2015. Much of this change has occurred outside of designated frontages where restrictions apply for change of use from retail. However, there have also been a number of approvals for change of use including an increase in mixed use developments in the High Street, notably with the opening of Costa and the very recent approval of Starbucks.

Distribution of A1 & A2 uses in Whitton town centre (2015)



Whitton town centre - role in providing retail opportunities to areas more than 400ms away from food shopping



- 5.2.20 Despite a general decline in the amount of retail floorspace, Whitton has experienced an increase in its retail offer in the past decade with the opening of a Lidl store in the long vacant former co-op store and the opening of the more recent Sainsburys Local. Whitton has also benefitted from public realm improvements funded by the Mayor’s Outer London Fund.
- 5.2.21 There are two outstanding permissions for A2 uses in the centre. The 2013 Town Centre Health Checks Report indicates a vacancy rate in line with the national average and lower rents achievable than in other district centres.
- 5.2.22 The map above shows that Whitton has an important role to play in providing shopping for residents. The green shading on the map identifies areas where residents are more than 400 metres from food shopping.

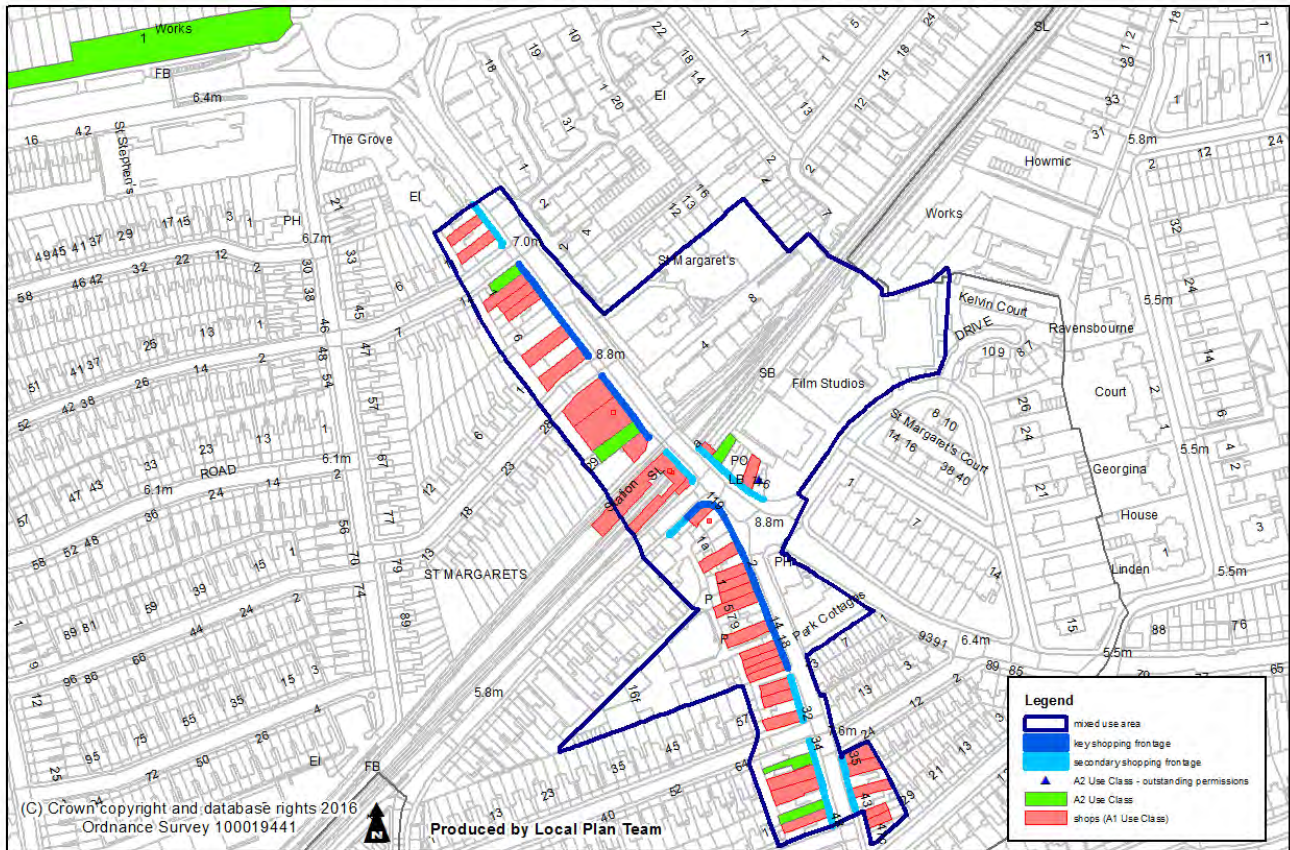
Recommendations

- 5.2.23 Although there is a desire to diversify the town centre by supporting the development of the evening economy, clearly Whitton has an important role as a district centre in meeting the shopping needs of local residents. It is recommended that an Article 4 Direction applies to a tightly defined boundary encompassing the centre’s key shopping frontage only. An Article 4 Direction relating to the change of use from A1 to A2 would not in any case affect the development of the evening economy.

5.2 (h) St Margarets local centre

5.2.24 With the exception of a number of A2 uses located in Globe House, to the north west of the centre, the majority are located in designated frontages in both key and secondary frontages. Approximately 12 % of the centre’s units are in A2 use at present, which is amongst the highest. Vacancy rates in St Margarets are low – less than half the national average.

Distribution of A1 & A2 uses in St Margarets (2015)



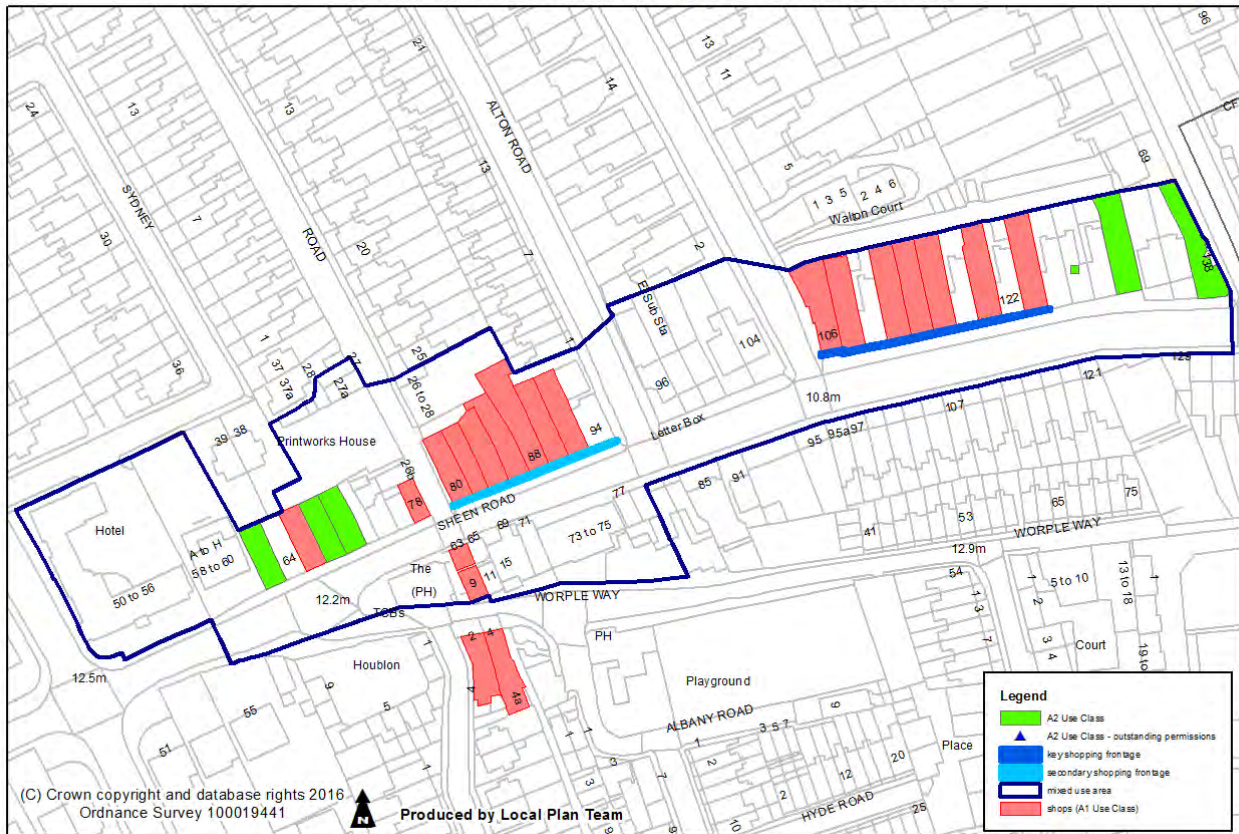
Recommendations

5.2.25 Most of the key frontage is dominated by A1 uses, much of the diversification having taken place in secondary shopping frontages at the periphery of the centre. It is recommended that the 3 blocks of key shopping frontage (2-24 Crown Road & 109-119 St Margarets Road, 125-155 St Margarets Road), be included in the area covered by an Article 4 Direction, primarily to protect the shopping function of this buoyant local centre. This approach allows for further diversification in secondary shopping frontages.

5.2 (i) Sheen Road neighbourhood centre

5.2.26 Clearly, local planning policies relating to retail frontages have been working well in this centre as Sheen Road’s designated frontages are dominated by shops (81% of units). Retail provision includes a number of essential shops such as two pharmacies, Post Office, foodstore, newsagents, foodstore and deli. It has a good range of retail services including an opticians, 2 dentists, chiropractor, hairdressers and launderette. It also has a food sector offer with at least one restaurant, take away and café.

Distribution of A1 & A2 uses in Sheen Road centre



5.2.26 At the time the Town Centre Land Use Survey was undertaken in 2015 there were no vacancies in designated frontages.

5.2.27 There is an agglomeration of offices in and around Sheen Road centre, of a scale that an Article 4 Direction to limit permitted development rights from B1 to C3 has been published. Office workers in the area help to boost the centre’s viability. The proportion of A2 uses in this centre, at 14%, is extremely high.

Recommendations

5.2.28 An Article 4 Direction would not be appropriate in this neighbourhood centre as although the proportion of A2 uses is comparatively high, they are all located outside of designated frontages. There is probably limited scope for further increase in A2 uses in such a small centre.

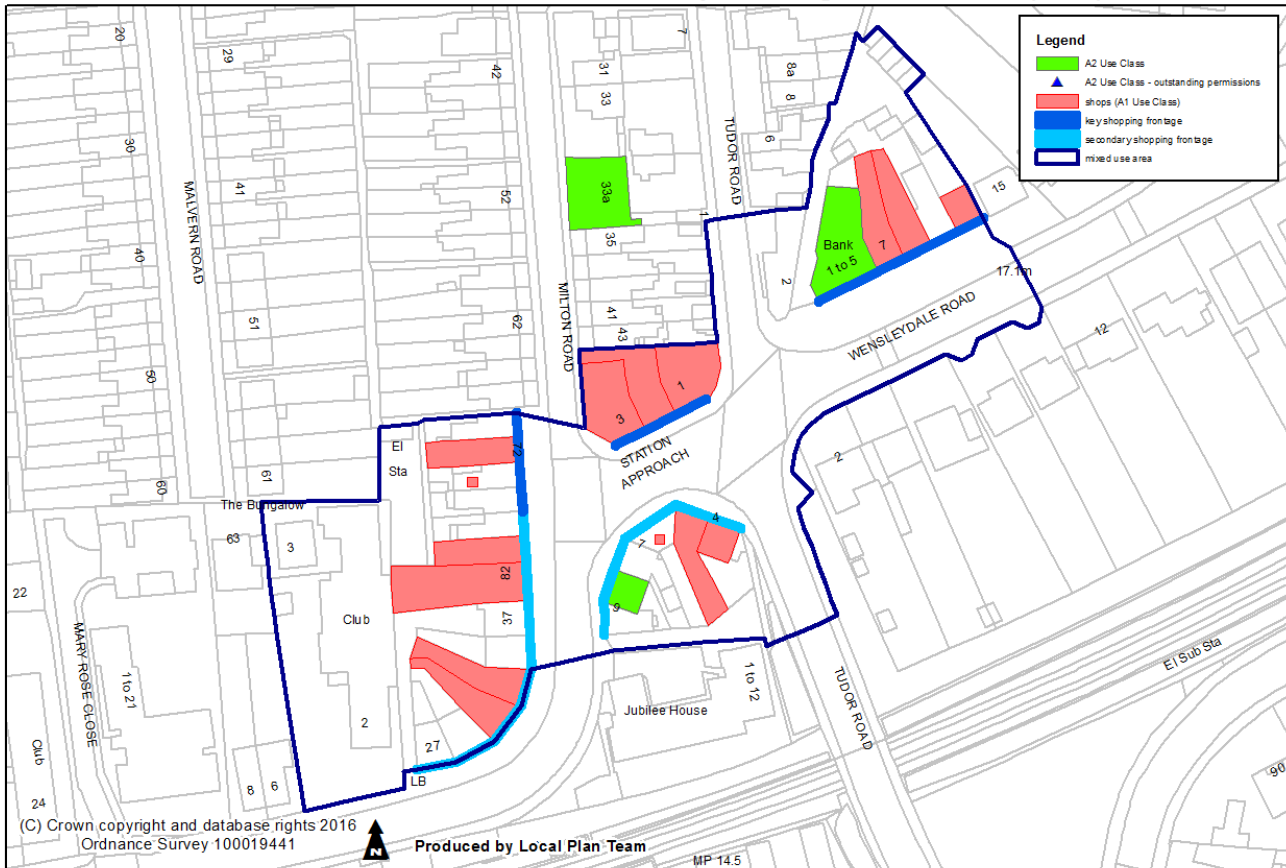
5.2 (j) Hampton Village local centre

5.2.29 Hampton Village is a dispersed local centre to the south west of the borough. Its vacancy rate is below that of similar centres⁸ at only 5.1% and the proportion of A1 uses in designated frontage is commensurate with the local centre average. It has a good range of shops and services including supermarkets in both the Station Road and Wensleydale Road AMUs, as well as the relatively recent addition of a neighbourhood Waitrose store.

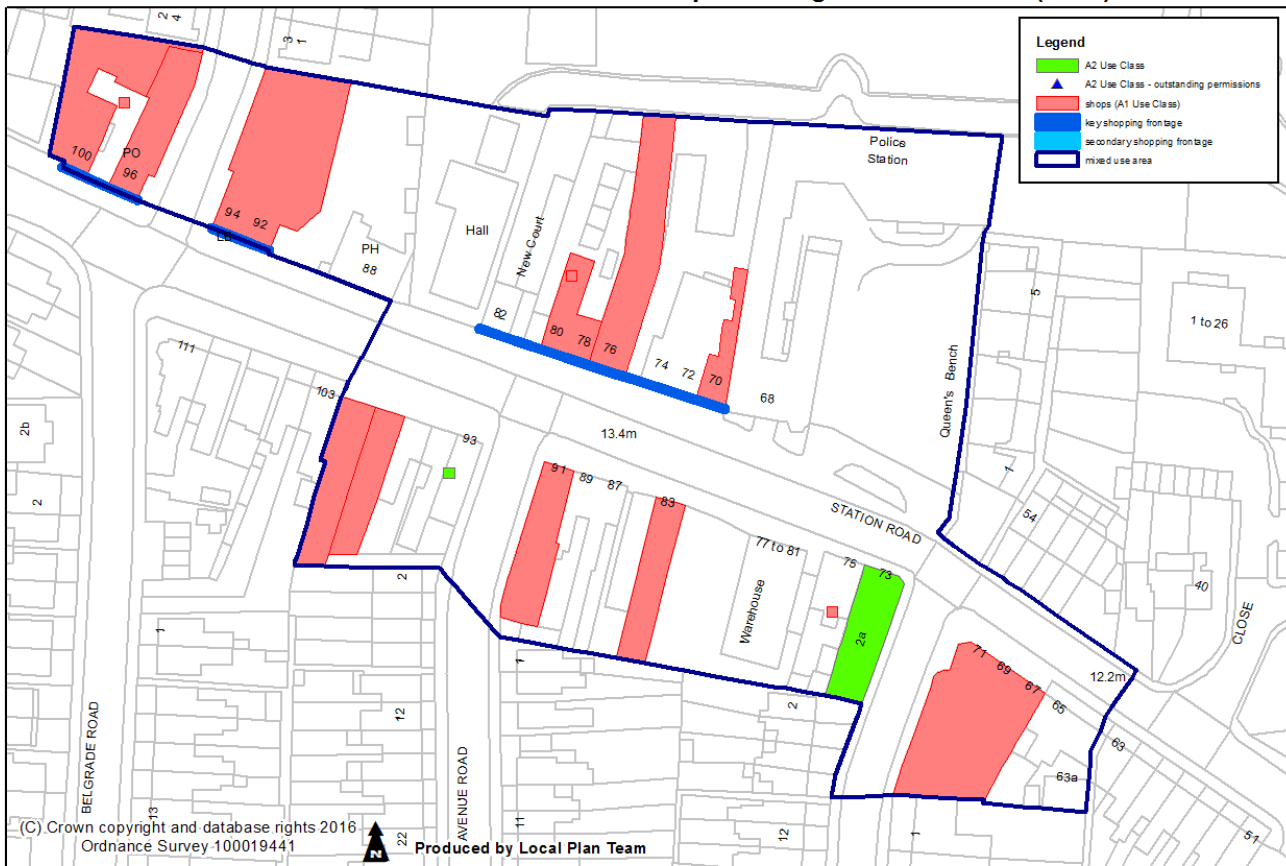
5.2.30 There are two sites allocated in the emerging Local Plan in the area: the Hampton Delivery Office, Rosehill and the Hampton Traffic Unit 60-68 Station Road. Both sites could accommodate a range of uses - potentially employment/commercial/ social infrastructure with residential as part of mixed use development.

⁸ local centre in the centre hierarchy as set out in Core Strategy policy CP8

Distribution of A1 & A2 uses in Hampton Village - central area (2015)



Distribution of A1 & A2 uses in Hampton Village - Station Road (2015)



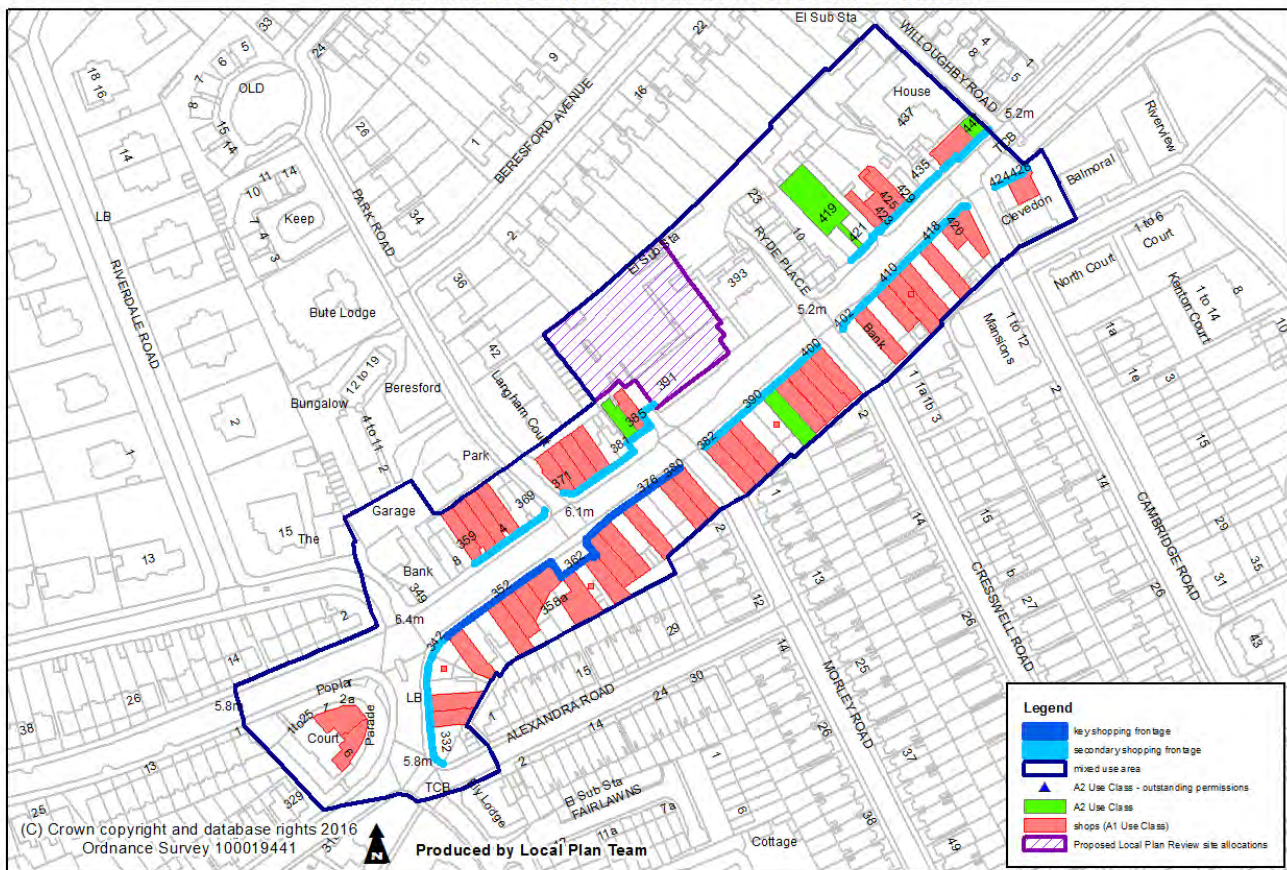
5.2.31 Clearly, the current level of A2 use, at 6.3% is not exceptionally high. In the case of Hampton Village, the purpose of introducing an Article 4 Direction covering parts of the centre would be to support and secure the centre’s retail function.

Recommendations

5.2.32 It is recommended that permitted development rights for change of use from A1 to A2 be removed via an Article 4 Direction. The boundary should be drawn tightly around parts of the centre’s key shopping frontage on Wensleydale Road, Station Approach, Milton Road and Station Road where there are several key retail shops (for example grocers and Post Office) meeting essential shopping needs.

5.2 (k) East Twickenham local centre

Distribution of A1 & A2 uses in East Twickenham



5.2.32 A2 uses are located in East Twickenham on both ground and upper floors in designated secondary shopping frontage. A2 uses amount to 5.2% of outlets in the centre a proportion which is not especially high. However, the proportion of A1 uses is slightly lower than the average for similar centres, whereas vacancy rates are comparatively high at 17%. However, the majority of vacancies are located in the secondary shopping frontage. In addition only approximately a half of vacancies are shops.

5.2.33 It should be noted that East Twickenham is the only centre below district level which has a significant retail allocation in the emerging Local Plan. This allocation indicated on the map above is adjacent to Ryde House. Retail is allocated on the ground floor and Lidl has purchased the site which does not at present benefit from planning permission. Should it be implemented it will add considerably to the retail offer of the centre. The current convenience offer is limited to off licences and one foodstore. East Twickenham has a comparison offer which includes shops in the DIY/home furnishings/furniture sectors including 2 kitchen shops. It has several charity

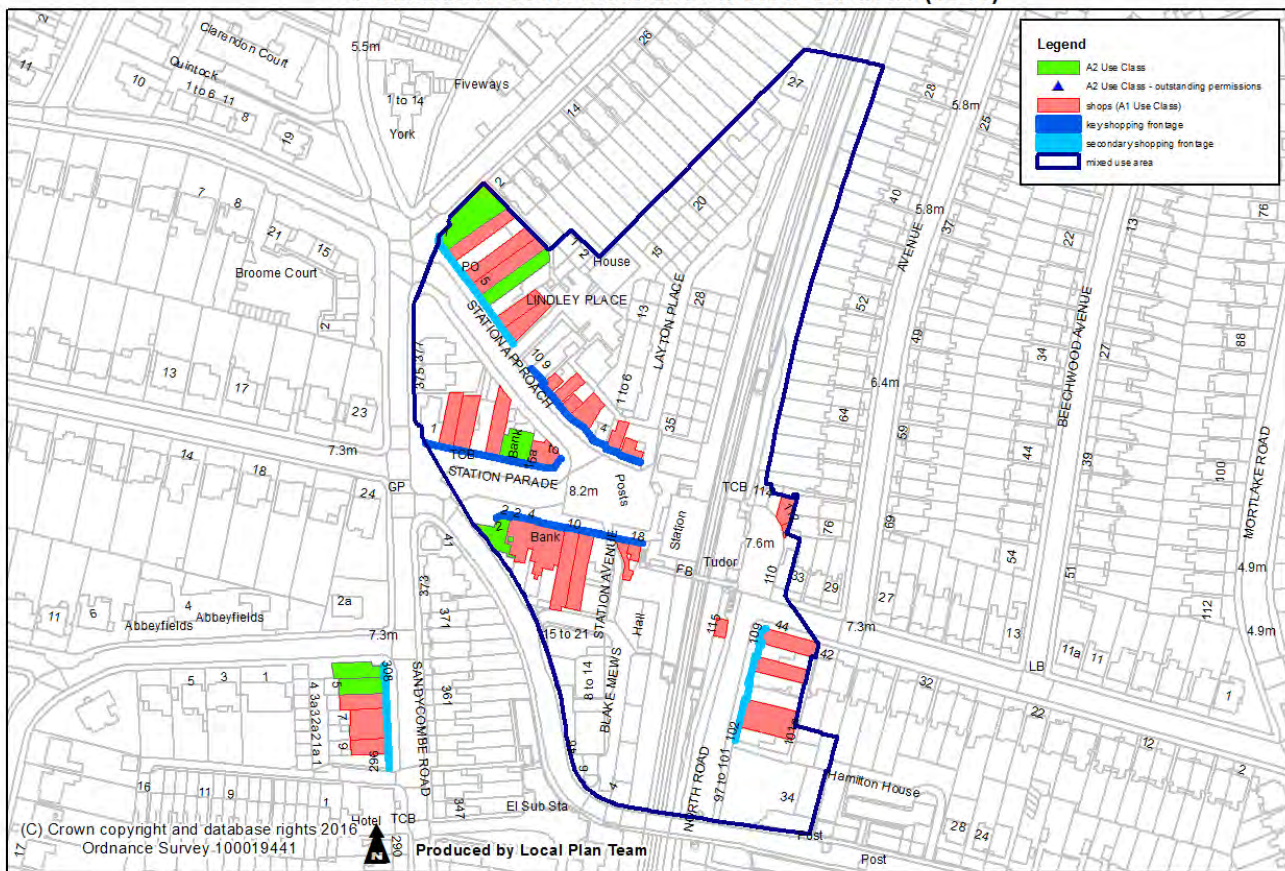
shops. There are also retail and community services including drycleaners, options, launderettes, a dispensing chemist and dentist.

Recommendations

5.2.34 The discreet block of key shopping frontage does not currently contain any A2 uses. The centre has far more secondary than key shopping frontage, where there is scope for more diversification. Should the retail allocation be implemented the retail offer will be considerably increased. Local centres are large centres with a significant role to play in providing shopping and services to local residents. It is appropriate that an Article 4 Direction should relate to a discreetly drawn block of key shopping frontage, in order to protect the centre’s retail function.

5.2 (I) Kew Gardens local centre

Distribution of A1 & A2 uses in Kew Gardens (2015)



5.2.35 All of the A2 uses currently in the centre are located in designated frontage, as are those in nearby Sandycombe Road. Just under 10% of the centre’s units are in A2 use at present, which is amongst the highest and above the average figure of 7.7% for centres of this type. Kew Gardens vacancy rate is only 5.9% and the proportion of A1 uses in designated frontages only just below the average for local centres. Key frontages are dominated by A1 uses, particularly Station Approach and the south side of Station Parade.

5.2.36 Kew Gardens offers a good range of goods & services. Tesco is represented in the centre in the form of a smaller format store. It has another foodstore, butchers, newsagent and off licences, plus other retail and community services such as a Post Office, dispensing chemists, opticians and dry cleaners. It also has some specialist shopping. Although the Marks & Spencer store and Kew Retail Park includes a food element, Kew Gardens Centre remains an important shopping and service resource for those living in this bend of the river, as well as a point of access to the area for those visiting the Royal Botanic Gardens.

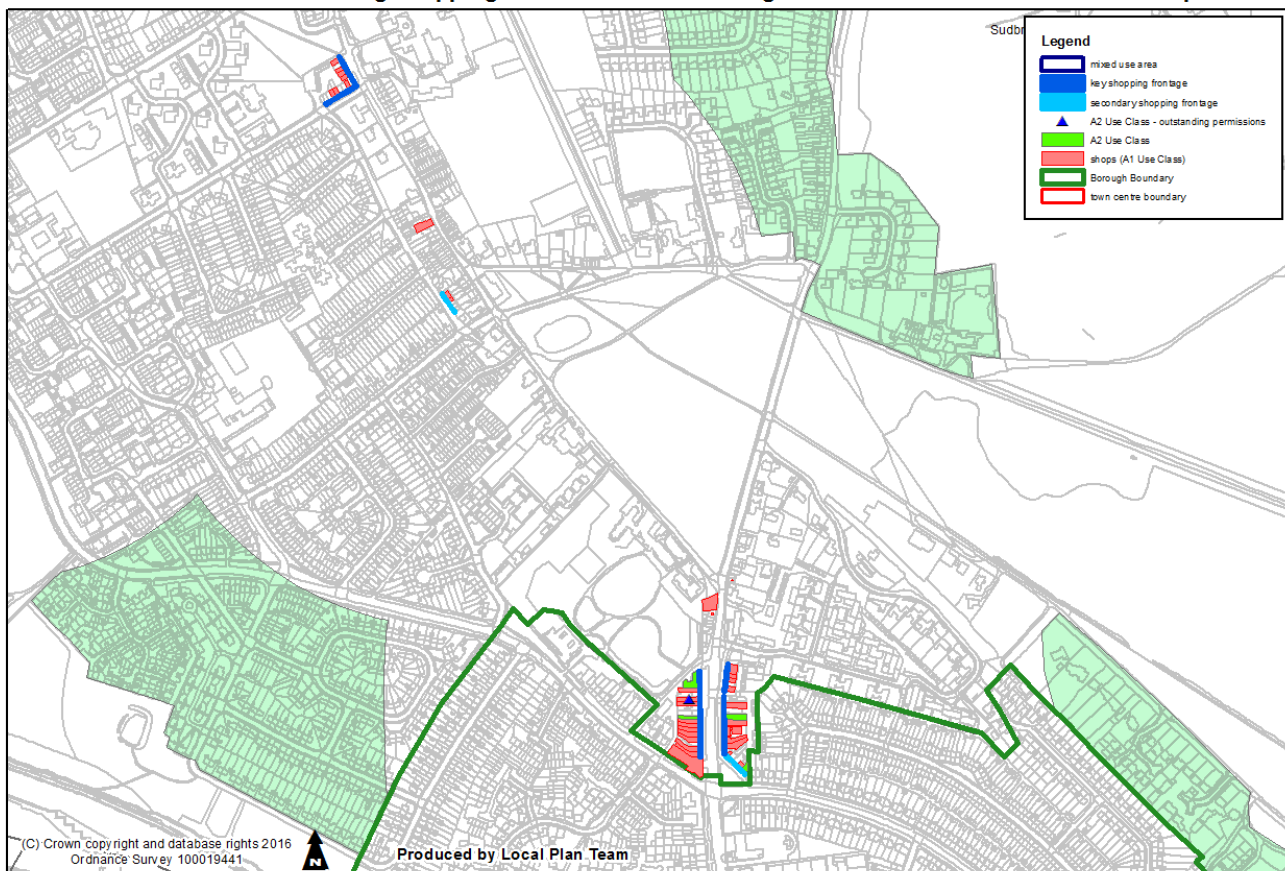
Recommendations

5.2.37 It is recommended that permitted development rights for change of use from A1 to A2 be removed via an Article 4 Direction. The boundary should include the centre’s key shopping frontage and the secondary shopping frontage on Royal Parade which includes the Post Office and other key local shops.

5.2(m) Ham Common local centre

5.2.38 Ham Common is identified in Core Strategy policy CP8 (d) as a centre with an important role in meeting local need, being one of the centres serving several residential areas more than 400 metres from local shopping facilities (the green shading on the map). The map below illustrates its importance in providing food shopping.

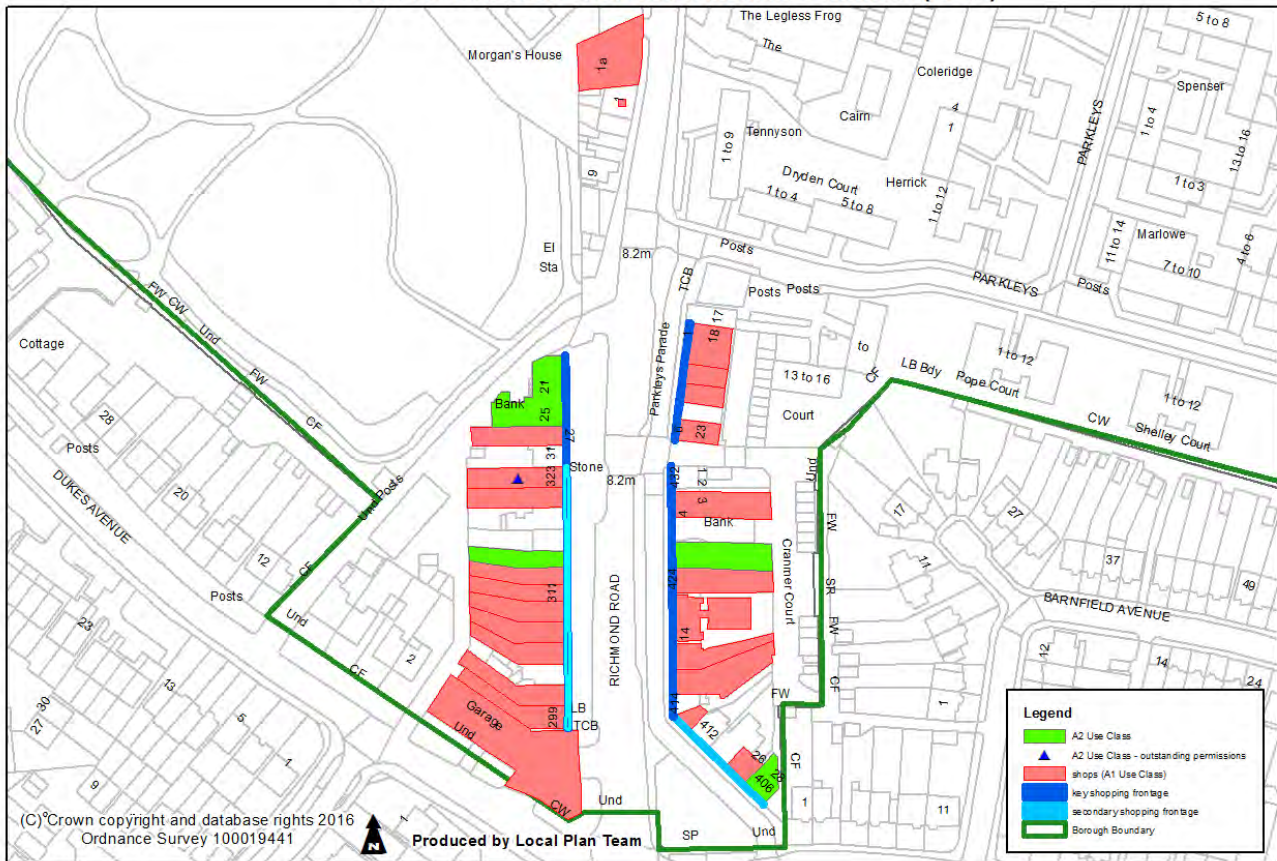
Ham Common - role in meeting shopping needs of residents living more than 400ms from convenience provision



5.2.39 This local centre has a number of A2 uses in its designated frontages. The former Barclays Bank is likely to be converted to a Sainsburys Local in due course. However, the potential loss of retail is of concern to the local community. There is a recent permission (Section 192) for change of use from a butcher to an estate agent. The Council has been informed that another lease has been signed for another similar change of use.

5.2.40 The centre has 9 units which are considered to be selling essential goods as per policy DMTC3 (C), and other businesses which provide useful retail services and social infrastructure including hairdressers, off licence, opticians, launderette, vet and funeral directors. At the time the 2015 Land Use Survey was undertaken the parade had only 2 vacancies, one being the bank and the other the former butchers referred to in the paragraph above.

Distribution of A1 & A2 uses in Ham Common (2015)



Recommendations

5.2.41 Ham Common is an important local centre in an area where retail facilities are limited. The surrounding population will grow should housing allocations included in the emerging Local Plan at the Cassell Hospital and St Michael’s Convent be implemented. There is likely to be demand for more A2 uses in this centre. An Article 4 Direction is warranted to cover key & secondary shopping frontages in this compact centre.

5.2(n) Friars Stile Road neighbourhood centre

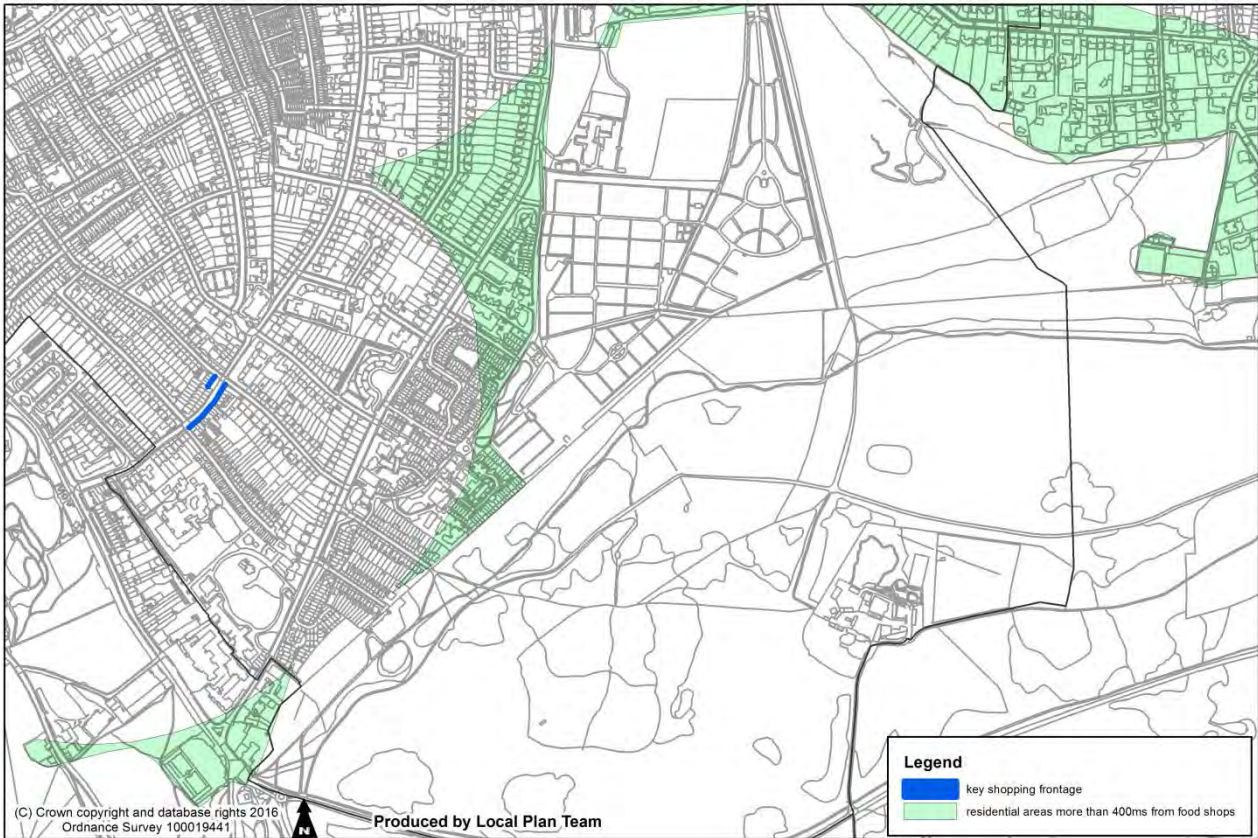
5.2.42 Friars Stile Road is identified in Core Strategy policy CP8 (d) as a centre with an important role in meeting local need, being one of the centres serving several residential areas more than 400 metres from local shopping facilities (the green shading on the map). The map below illustrates its importance in providing food shopping.

5.2.43 The centre’s retail provision is illustrated in the second map which illustrates the proliferation of essential shops and other useful A1 services in the centre.

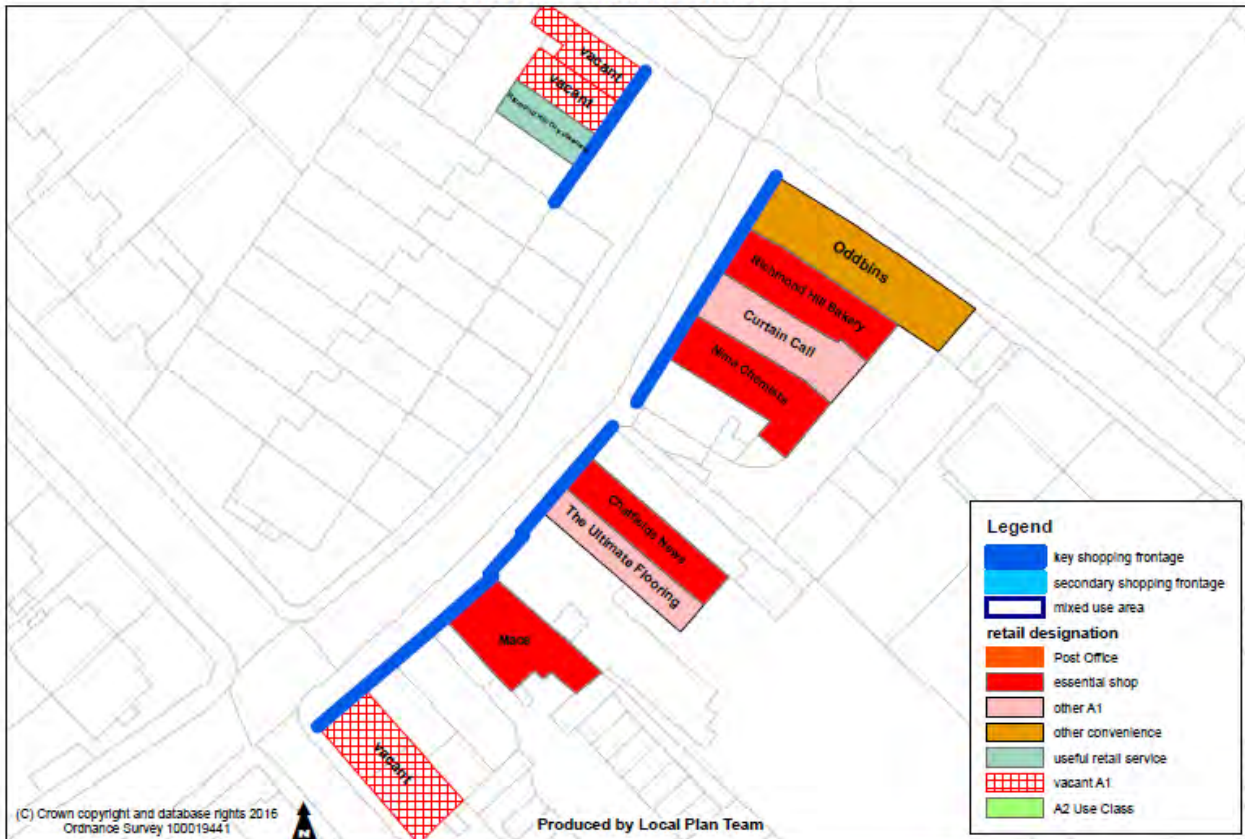
Recommendations

5.2.44 Friars Stile Road is an important neighbourhood centre in an area where retail facilities are limited. An Article 4 Direction is warranted to cover key shopping.

Friars Stile Road centre - role in meeting shopping needs of residents living more than 400ms from food shopping



Friars Stile Road - Retail Provision



6 Summary and Maps

6.1 Summary Table

| centre | Level in hierarchy | Number of A2 uses in centre 2015 | % A2s in designated frontage 2015 | Vacancy rate 2015 | UK comparison – property services sector 2015 (floorspace index) | Capacity retail floorspace by 2024 | Recommendation | Justification |
|------------|--------------------|----------------------------------|-----------------------------------|-------------------|--|------------------------------------|---|---|
| Richmond | district centre | 35 | 80.0 | 7.3 | 149 | 7,000 | Article 4 Direction to cover the majority of the key shopping frontage and a small part of the secondary shopping frontage in the Quadrant where concentrations of A2 uses are high. | Richmond is the borough's principal centre with a sub-regional role. It is a buoyant centre. It is also expected to accommodate the majority of the borough's retail need. |
| Twickenham | district centre | 29 | 79.3 | 8.4 | 126 | 2,300 | Article 4 Direction to cover key shopping frontage and secondary shopping frontage on parts of Heath Road where there are existing concentrations of A2 use and parts of London Road including the site allocation for Twickenham Police Station. | Twickenham is the second largest centre in the borough. There is a forecast need to provide additional retail floorspace. There are a number of site allocations in the adopted TAAP. |
| East Sheen | district centre | 25 | 72.0 | 4.8 | 171 | 1,000 | An Article 4 Direction should cover East Sheen's key shopping frontage and a limited amount of secondary frontage contiguous with the key shopping frontage in central locations: the first block on Sheen Lane and blocks immediately to the east and west of key shopping frontage on the Upper Richmond Road West. | This approach protects the retail function of this district centre which is expected to contribute towards meeting the borough's retail need. |
| Teddington | district centre | 20 | 71.4 | 3.6 | 294 | 1,300 | Article 4 Direction to cover the key shopping frontage on both Broad Street and High Street. | The Retail Study (Nov 2014) forecasts that the centre could provide 1,300m ² of retail (A1) space by 2024. A very low vacancy rate means there is little scope to provide additional retail in existing vacancies. This buoyant centre has a role to play in meeting the borough's retail needs. |

| centre | Level in hierarchy | Number of A2 uses in centre 2015 | % A2s in designated frontage 2015 | Vacancy rate 2015 | UK comparison – property services sector 2015 (floorspace index) | Capacity retail floorspace by 2024 | Recommendation | Justification |
|--------------|--------------------|----------------------------------|-----------------------------------|-------------------|--|------------------------------------|---|---|
| Barnes | local centre | 18 | 77.8 | 2.4 | 323 | ** | Article 4 Direction to cover the majority of designated frontage at the Barnes High Street end of the centre, and the key shopping frontage at the Church Road/Castelnau end. | Barnes is the largest of the borough's local centres and is highly valued by residents for providing shops and services. Barnes is also a tourist destination. It is a healthy centre with a very low vacancy rate. It has an existing over-concentration of A2 uses, particularly evident at the Barnes High Street end of the centre. The removal of permitted development rights is warranted to restrict further loss of shopping floorspace and protect the retail function of the centre. |
| Hampton Hill | local centre | 11 | 72.7 | 11.4 | 434 | ** | It is recommended that a tightly defined boundary encompassing the north of the centre be covered by an Article 4 Direction which includes 2 blocks of key shopping frontage to the north of the centre.. | Hampton Hill local centre provides valuable facilities for local residents. The centre has a good proportion of secondary and non-designated frontage allowing scope for diversification. The 2 blocks of key shopping frontage are dominated by A1 uses and warrant protection to support the retail function of the centre. |
| Whitton | district centre | 11 | 45.5 | 9.0 | 221 | 900 | It is recommended that an Article 4 Direction applies to a tightly defined boundary encompassing the centre's key shopping frontage only. | Whitton is a district centre with a particularly important role in meeting the needs of those living more than 400 metres from shopping facilities. The centre has benefitted from recent investment in the public realm and its retail offer has been added to with the opening of Lidl and Sainsburys Local. |
| St Margarets | local centre | 8 | 62.5 | 4.5 | - | ** | It is recommended that the 3 blocks of key shopping frontage (2-24 Crown Road & 109-119 St Margarets Road, 125-155 St Margarets Road), be included in the area covered by an | St Margarets is a vital local centre with a low vacancy rate. This approach will protect the centre's retail function. |

| centre | Level in hierarchy | Number of A2 uses in centre 2015 | % A2s in designated frontage 2015 | Vacancy rate 2015 | UK comparison – property services sector 2015 (floorspace index) | Capacity retail floorspace by 2024 | Recommendation | Justification |
|-----------------|----------------------|----------------------------------|-----------------------------------|-------------------|--|------------------------------------|--|---|
| | | | | | | | Article 4 Direction | |
| Sheen Road | neighbourhood centre | 6 | 0 | 4.9 | - | ** | Article 4 Direction should not apply. | Existing A2 uses are located outside of designated shopping frontages. Already high proportion of A2 uses, unlikely for there to be scope for substantial increase in so small a centre. |
| Hampton Village | local centre | 5 | 40.0 | 5.1 | - | ** | It is recommended that an Article 4 Direction should relate to <u>parts</u> of the key shopping frontage. The boundary should be drawn tightly around parts of Wensleydale Road, Milton Road, Station Approach and Station Road where there are several key retail shops (for example grocers and Post Office) meeting essential shopping needs. | Approach warranted to protect the essential retail function of this local centre. |
| Kew Gardens | local centre | 5 | 100.0 | 5.9 | - | ** | It is recommended that an Article 4 Direction applies to parts of the centre to remove PD rights. The boundary should include the centre's key shopping frontage and the secondary shopping frontage on Royal Parade which includes the Post Office and other key local shops. | Kew Gardens Centre remains an important shopping and service resource for those living in this bend of the river, as well as a point of access to the area for those visiting the Royal Botanic Gardens. It is a buoyant centre with low vacancy rates. Approach warranted to protect the essential retail function of this local centre. |
| East Twickenham | local centre | 4 | 100.0 | 17.1 | - | ** | It is recommended that an Article 4 Direction should relate to the comparatively small amount of key shopping frontage. | East Twickenham is a local centre, which are large centres with a significant role to play in providing shopping and services to local residents. The centre has a significant retail allocation. It is appropriate that an Article 4 Direction should relate to a discreetly drawn block of key shopping frontage, in order to protect the |

| centre | Level in hierarchy | Number of A2 uses in centre 2015 | % A2s in designated frontage 2015 | Vacancy rate 2015 | UK comparison – property services sector 2015 (floorspace index) | Capacity retail floorspace by 2024 | Recommendation | Justification |
|--------------------|----------------------|----------------------------------|-----------------------------------|-------------------|--|------------------------------------|---|---|
| | | | | | | | | centre's retail function. |
| Ham Common | local centre | 4 | 100.0 | 7.0 | - | ** | An Article 4 Direction is warranted to cover key & secondary shopping frontages in this compact centre. | Ham Common local centre has a particularly important role in meeting the needs of those living more than 400 metres from shopping facilities. Approach warranted to protect the essential retail function of this local centre. |
| Friars Stile Road* | neighbourhood centre | 1 | 100.0 | 14.3 | - | ** | An Article 4 Direction is warranted to cover the key shopping frontage. | Friars Stile Road is important in meeting the needs of those living more than 400 metres from shopping facilities. It currently provides local essential shopping facilities and has recently lost a deli and butchers to an estate agent. |

Sources:

Land use data – 2015 Town Centre Land Use Survey

GOAD data – © Experian GOAD 2016. Source: Experian GOAD Category Reports dated 2011 & 2012. GOAD index comparing sectors to UK average hypothetical town centre (100= average)

Categories will not tie up exactly with A2 use class

Capacity forecasts – NLP, Retail Study, November 2014. Gross figures, forecasts up to 2024.

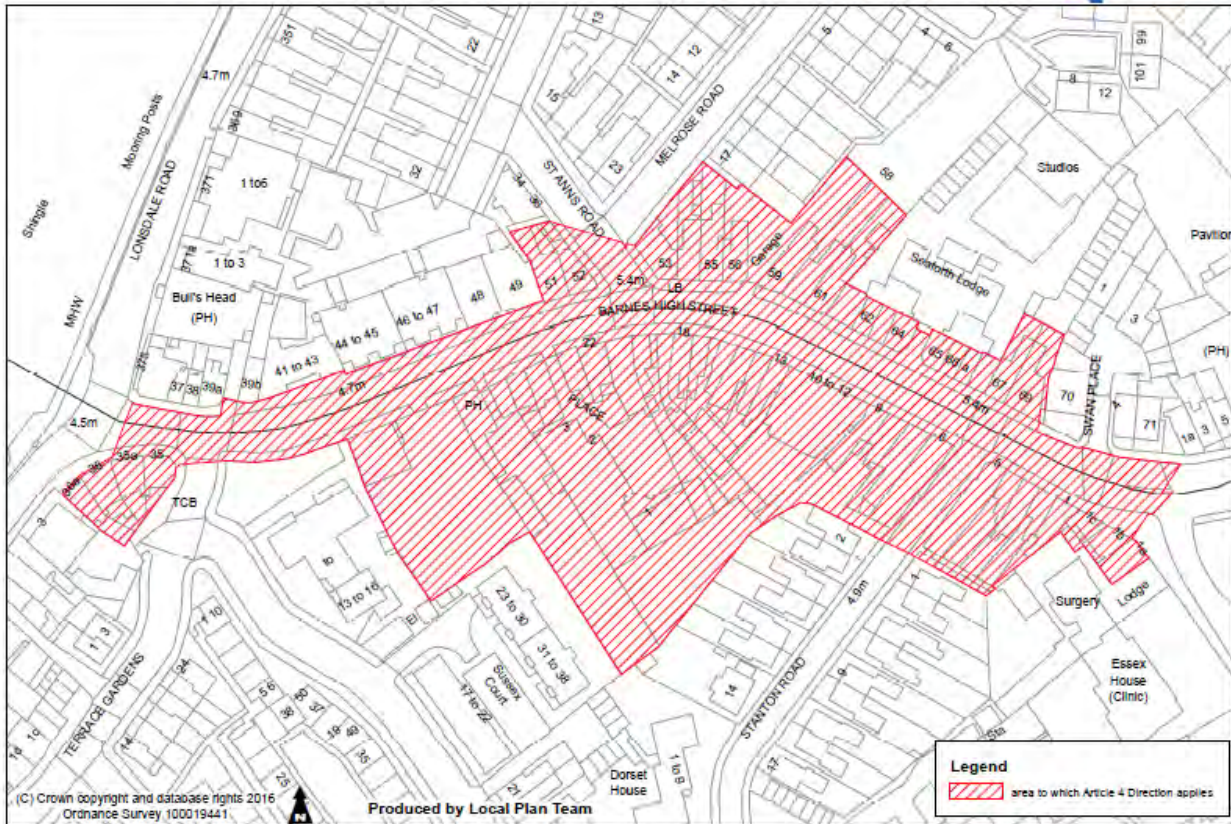
* Double unit subsequently occupied by estate agent

 ** The Retail Study did not produce centre-specific forecasts below district centre level. The forecast for retail (A1) floorspace the “rest of the borough”, i.e. not including the 5 main town centres is 3,200m² gross. There are no allocations in the emerging Local Plan in either Barnes or Hampton Hill.

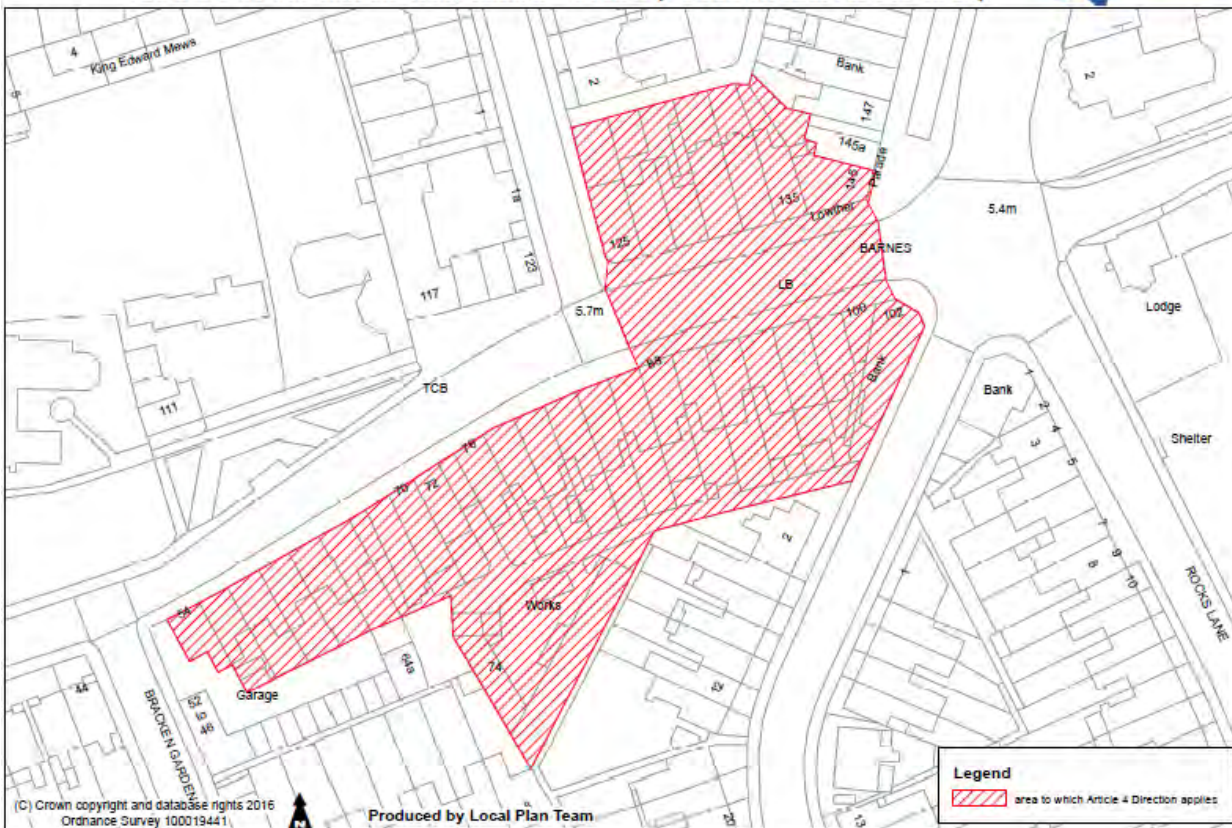
6.2 Maps of proposed Article 4 Directions

6.2 (a) Barnes

Barnes High Street, Barnes - parts of - Article 4 (A1 Use Class to A2 Use Class)

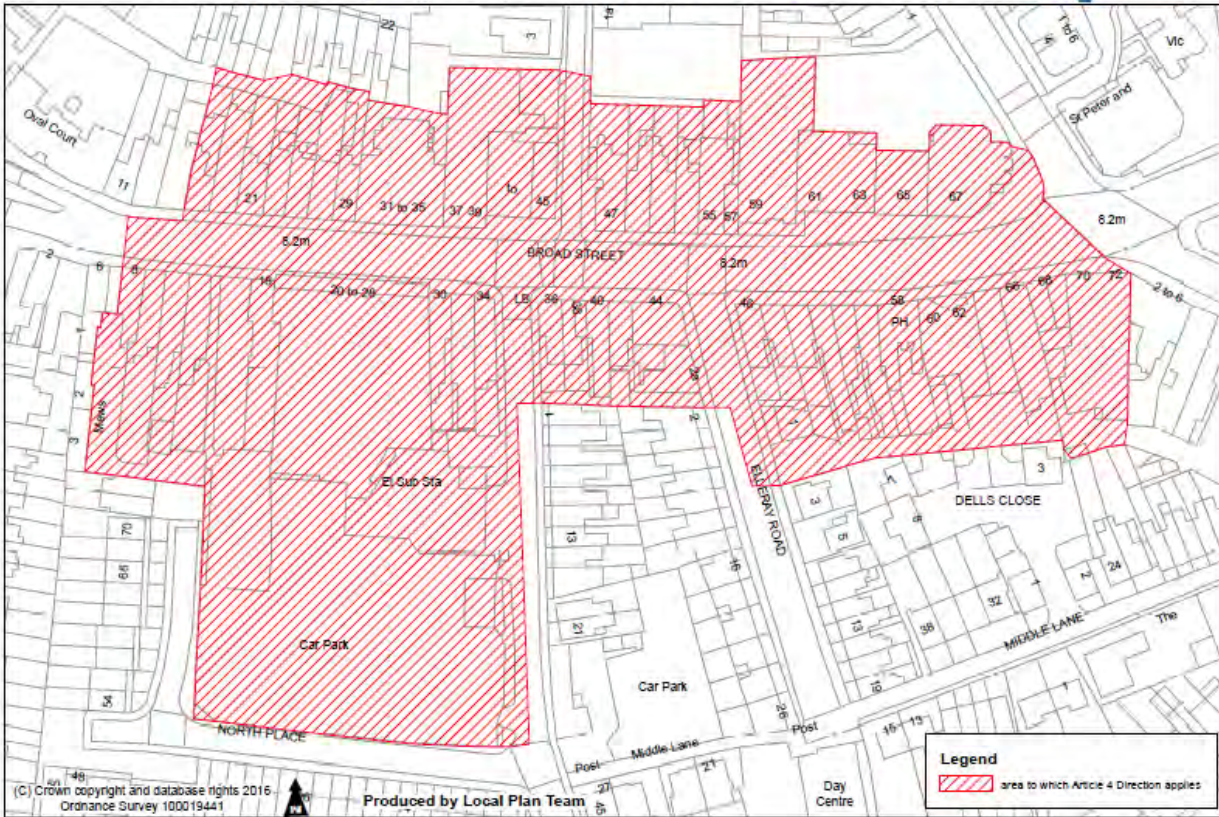


125-145 & 54-102 Church Road, Barnes - Article 4 (A1 Use Class to A2 Use Class)



6.2 (b) Teddington town centre

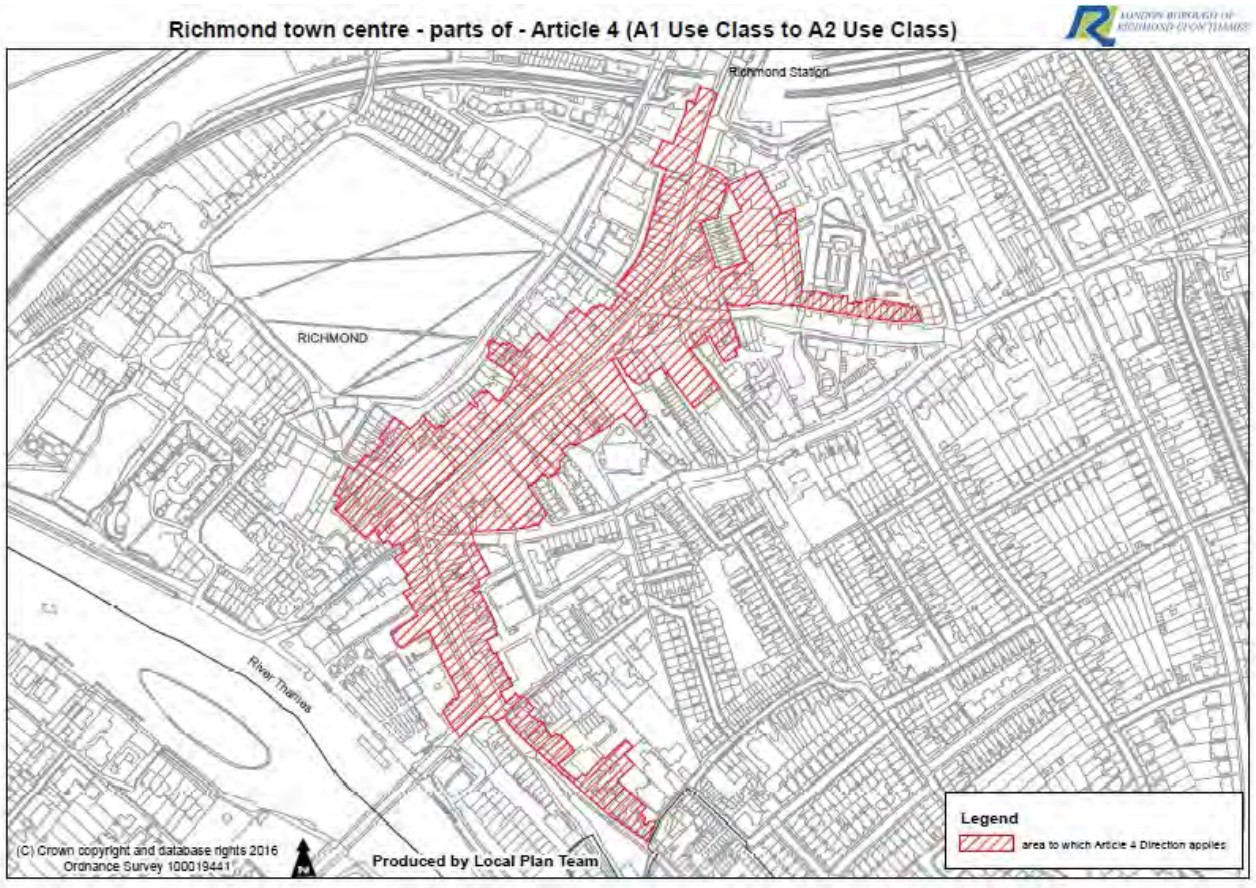
Broad Street, Teddington (parts of) - Article 4 (A1 Use Class to A2 Use Class)



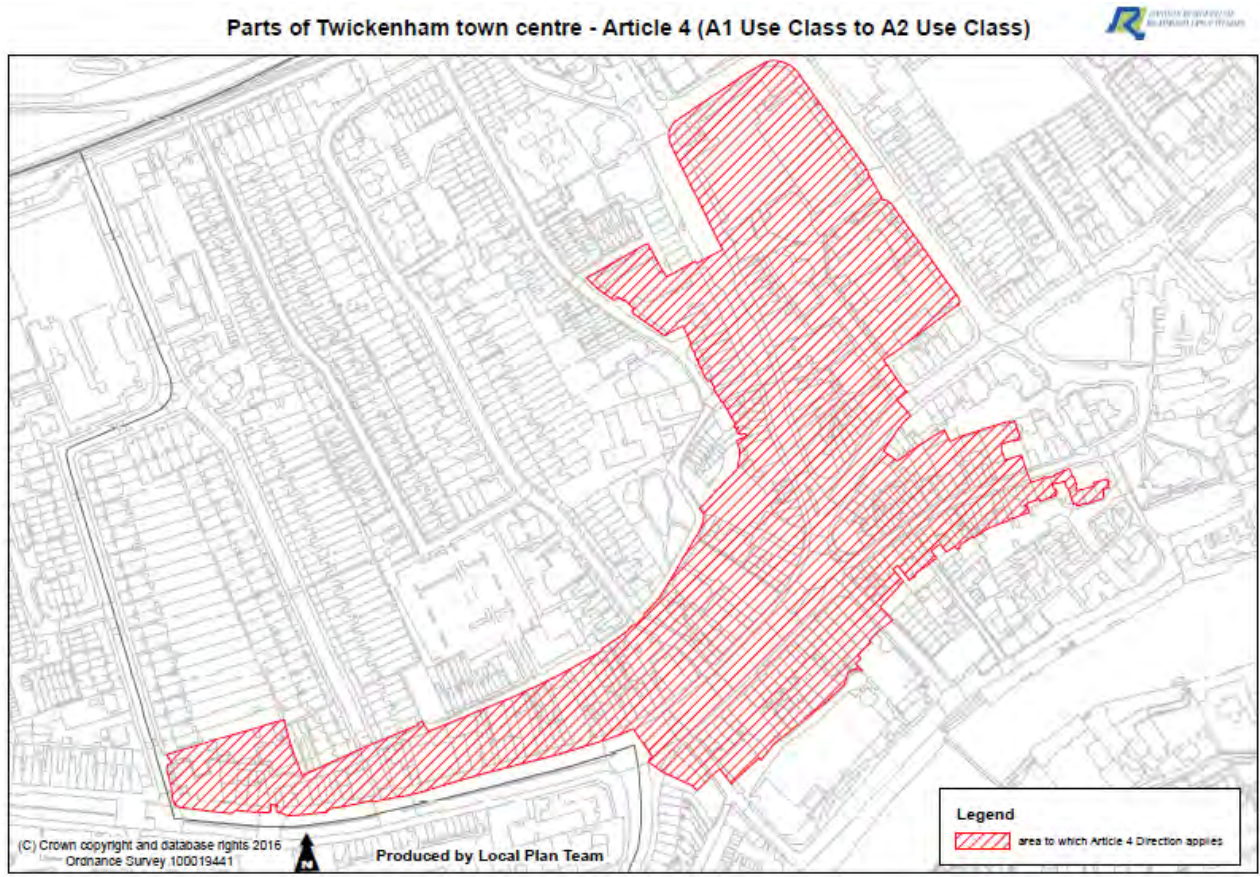
High Street, Teddington (parts of) - Article 4 (A1 Use Class to A2 Use Class)



6.2 (c) Richmond town centre

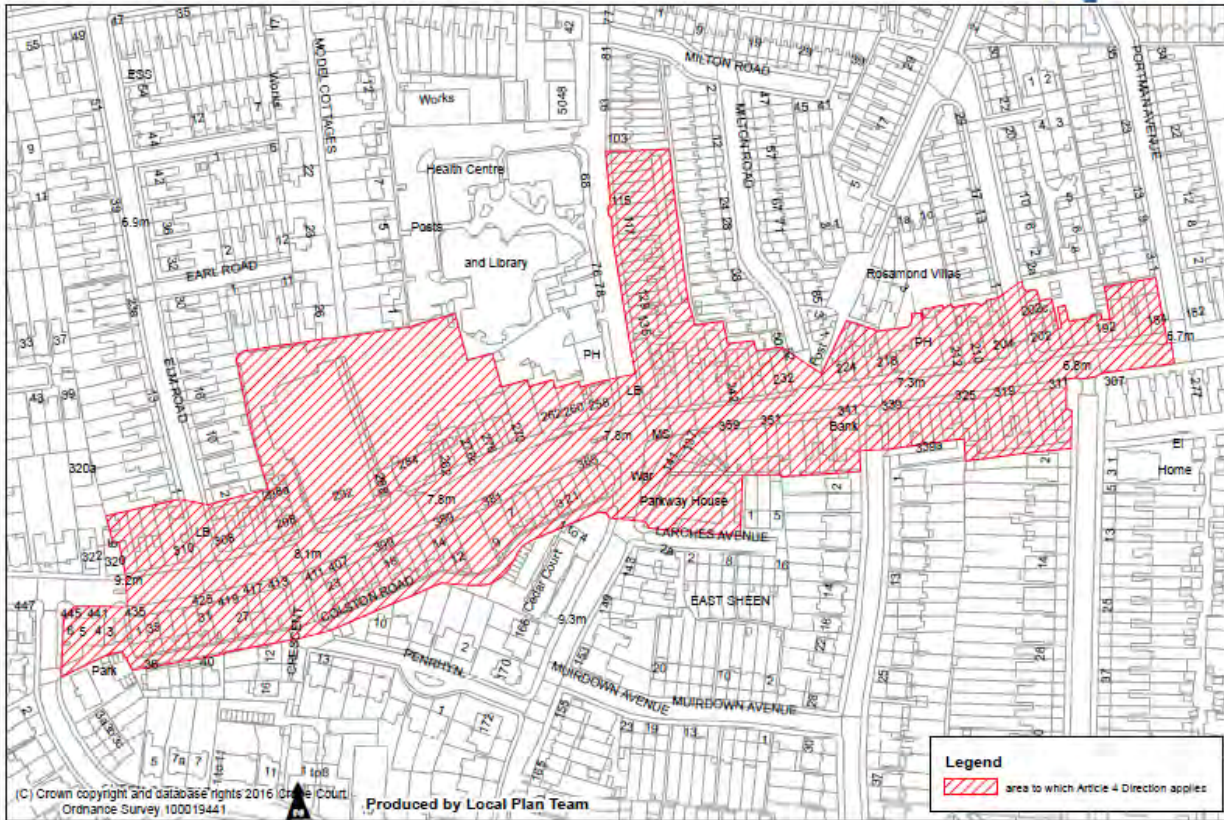


6.2 (d) Twickenham town centre



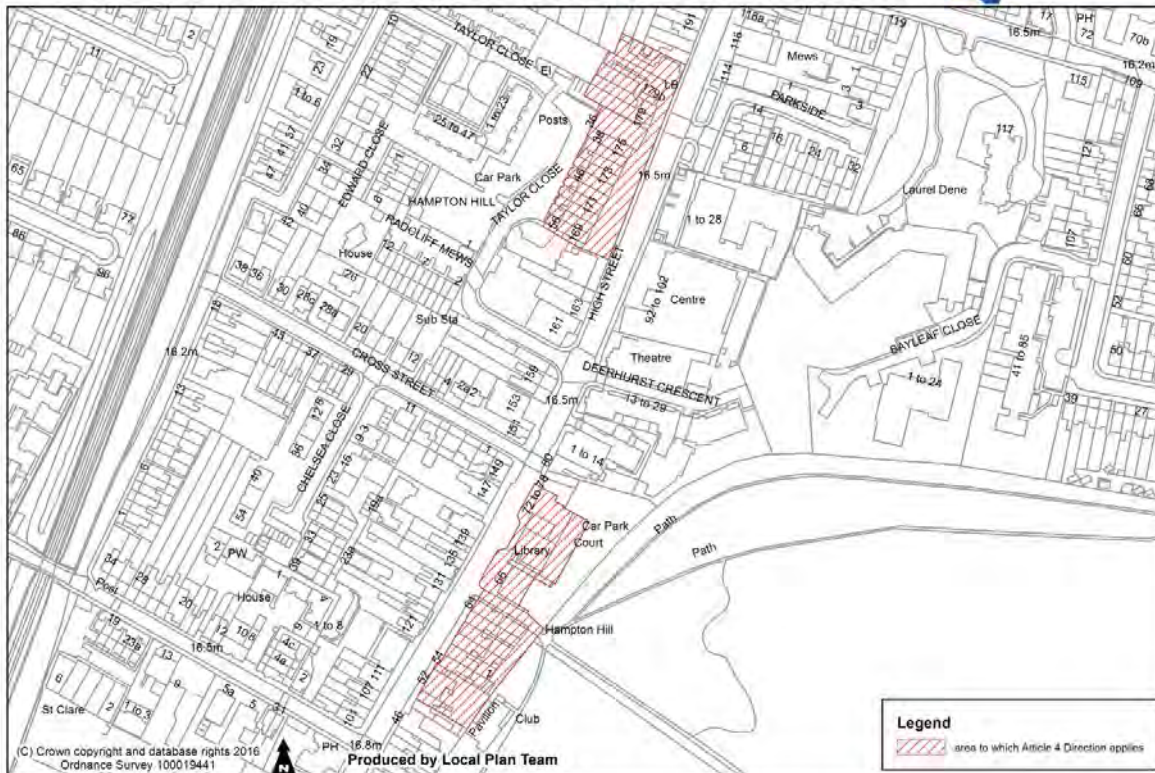
6.2 (e) East Sheen town centre

East Sheen - parts of Upper Richmond Road West & Sheen Lane- Article 4 (A1 Use Class to A2 Use Class)



6.2 (f) Hampton Hill local centre

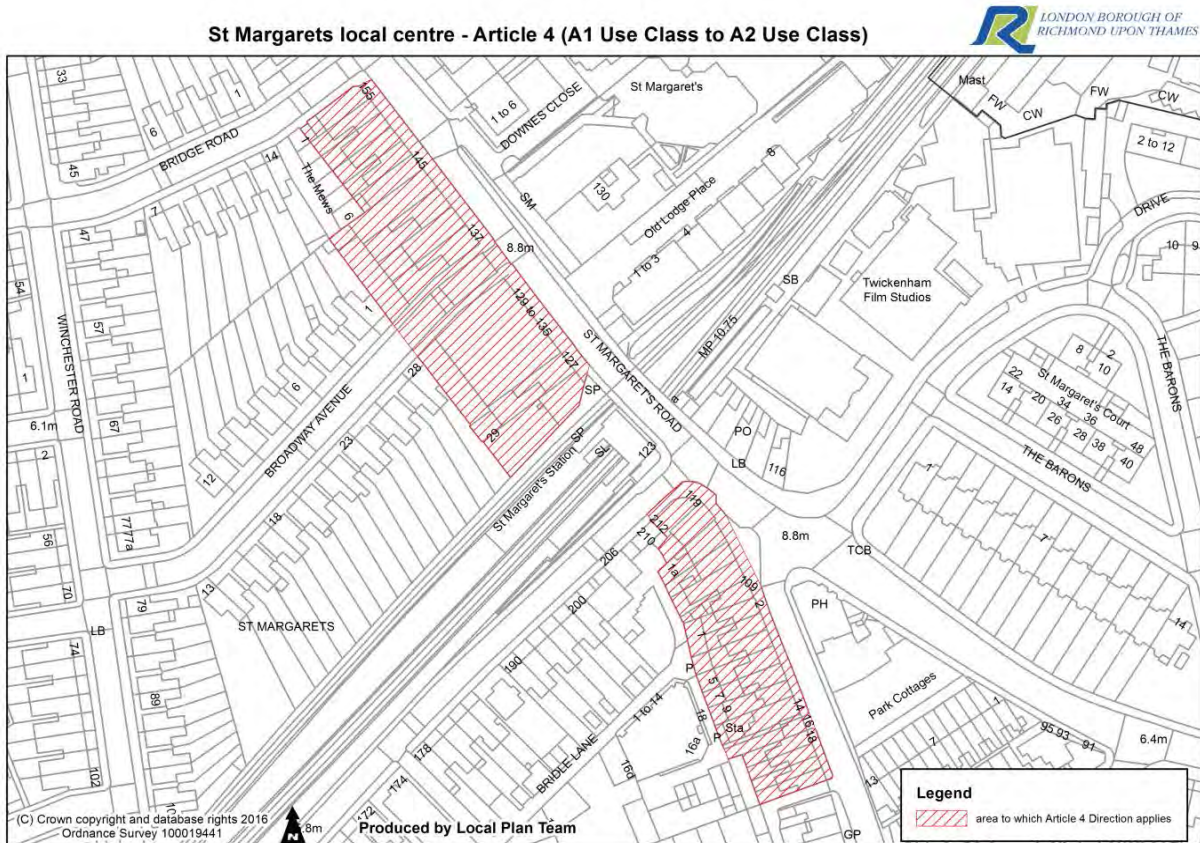
Hampton Hill local centre - parts of High Street - Article 4 (A1 Use Class to A2 Use Class)



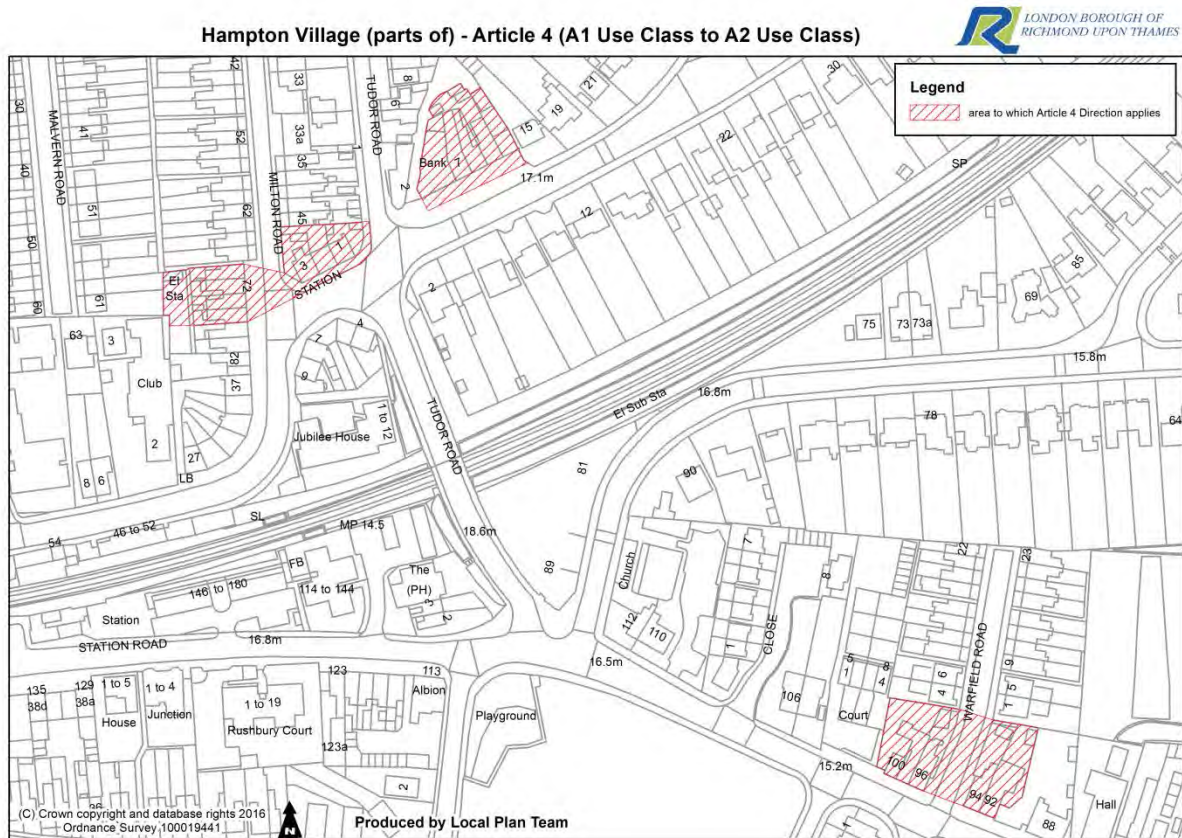
6.2 (g) Whitton district centre



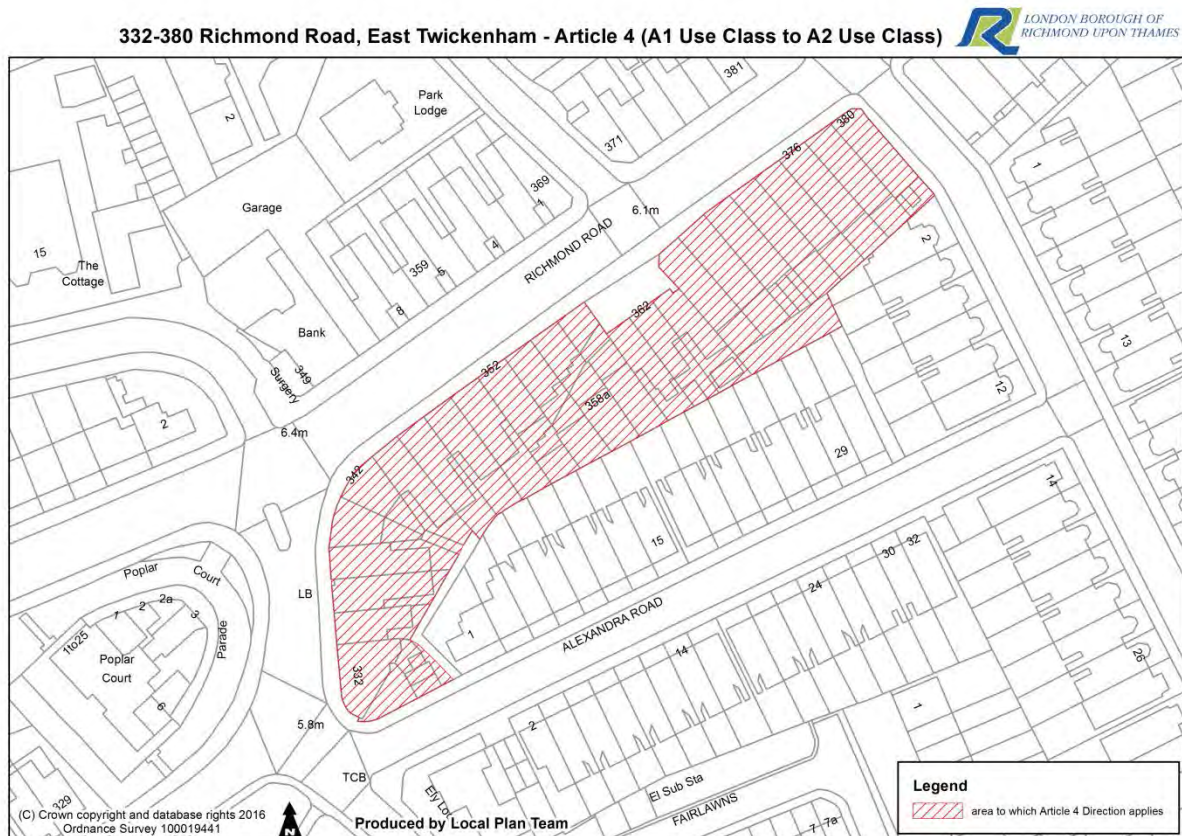
6.2 (h) St Margarets local centre



6.2 (i) Hampton Village local centre

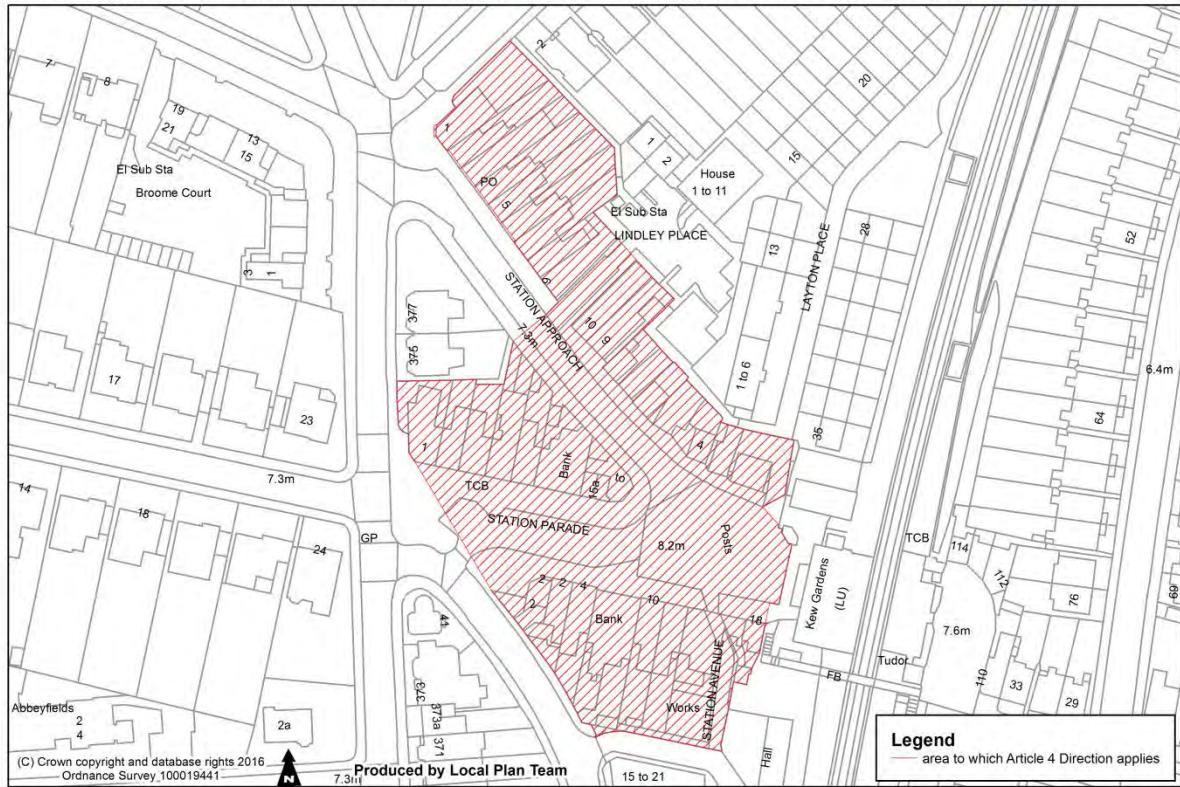


6.2 (j) East Twickenham local centre



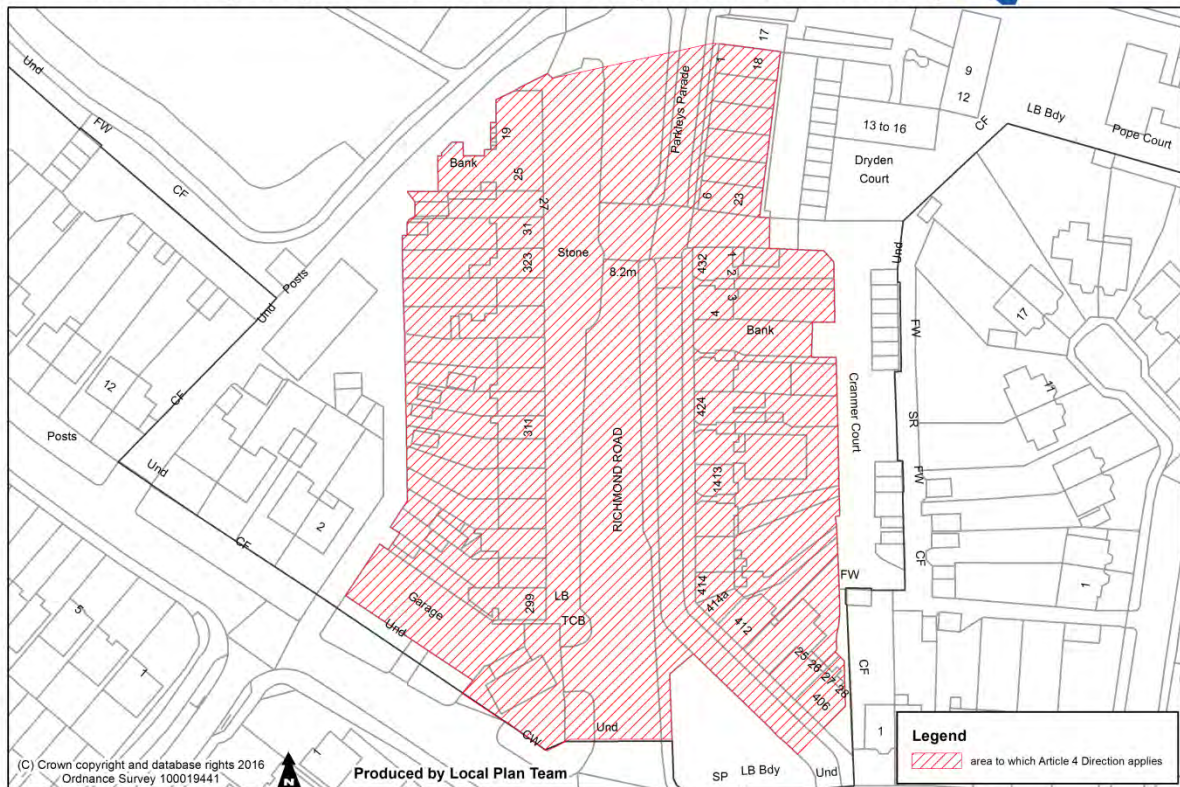
6.2 (k) Kew Gardens local centre

Station Approach and Station Parade, Kew Gardens local centre - Article 4 (A1 Use Class to A2 Use Class)



6.2 (l) Ham Common local centre

Ham Common (Parade), Richmond Road, Ham - Article 4 (A1 Use Class to A2 Use Class)



6.2 (m) Friars Stile Road neighbourhood centre

Friars Stile Road, Richmond - parts of - Article 4 (A1 Use Class to A2 Use Class)

