

Policy 18

Development in Centres

- A. Development proposals for town centre, community, healthcare, educational and cultural uses will be supported in the borough's designated centres as delineated by town centre and local centre boundaries where they:
1. are in keeping with the centre's role and function within the hierarchy and are of a scale appropriate to the size of the centre, in line with Policy 2 'Spatial Strategy: Managing change in the borough (Strategic Policy)';
 2. retain a ground floor commercial or community use, to maintain and promote the continuity of active frontages at ground floor and / or to provide a direct service to visiting members of the public;
 3. incorporate a flexible design such that the site could respond to changing market demand and requirements to effectively accommodate appropriate alternative uses in the future, helping to enhance the long-term resilience of the centre;
 4. provide unit(s) of a size and format to accommodate town centre uses that will be fit for purpose and viable in the long term, including being adequate in terms of: width of unit, layout, access to facilities for users and servicing;
 5. optimise the potential of the site by contributing a suitable use or mix of uses that enhance the vitality and viability of the centre, particularly where this diversifies the centre's offer;
 6. do not adversely impact on the vitality and viability of the centre in which the development is proposed, or another centre;
 7. contribute towards employment floorspace, providing suitable provision for small businesses or flexible workspace, where required by policies in '**Increasing jobs and helping business to grow and bounceback following the pandemic**';
 8. support the Cultural Quarters in Richmond and Twickenham town centres and other existing clusters of cultural facilities and creative industries in our centres, as supported by Policy 26 'Visitor Economy ';
 9. would not result in an over-concentration of similar uses (such as betting shops, public houses, bars and take-aways) in any one area, where this would result in an adverse cumulative impact on the amenity of nearby users, including residents, in accordance with Policy 19 'Managing the Impacts of Development on Surroundings ';
 10. contribute to a safe, secure and inclusive environment.
- B. In addition to meeting the criteria set out in Part A of this policy, development proposals for retail ⁽³⁾uses will be supported where:
1. In Primary Shopping Areas (PSAs), which have been designated in Town Centres as shown on the Policies Map, the loss of retail floorspace will be resisted. New retail development is encouraged to locate within the PSA or within a Site Allocation which specifies retail, meeting any requirements of that Site Allocation including scale of retail and complying with other policies in this Plan:
 2. the proposal is in accordance with Policy 20 'Shops and Services Serving Essential Needs' in relation to resisting the loss of defined essential shops and services;
 3. the proposal retains or provides a shopfront, or where this is not possible, provides a 'shop-like' appearance, to avoid a detrimental visual impact and respect the heritage and character of

3 'Retail' is defined in the Definitions box at the beginning of the chapter.

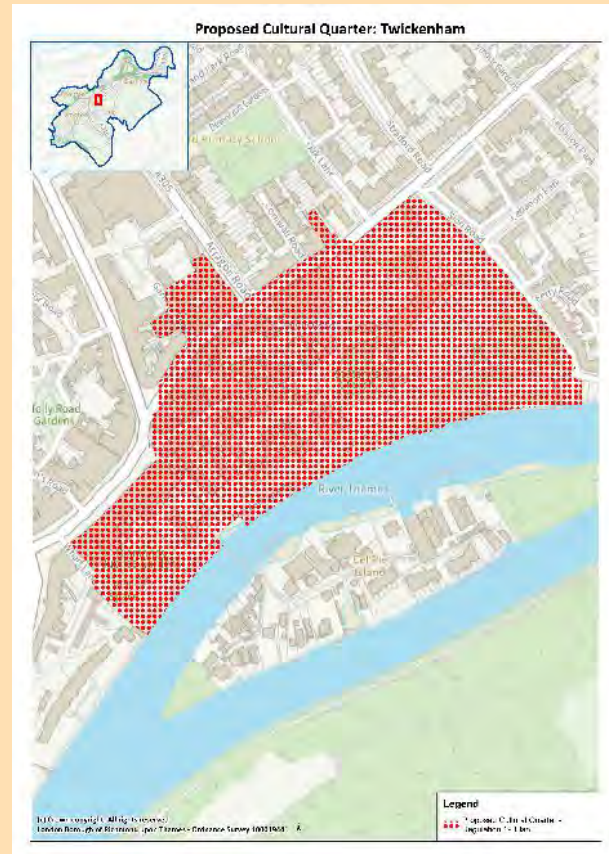
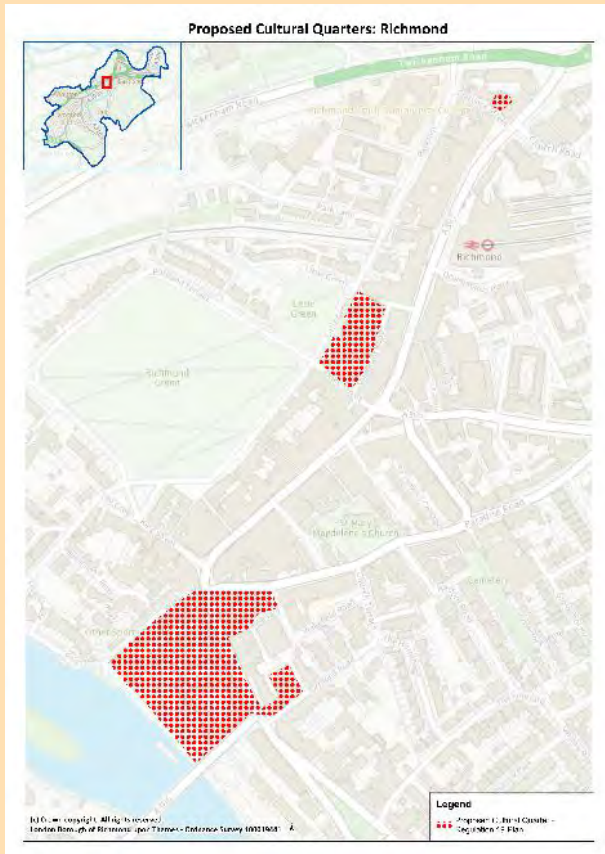
- the centre, in accordance with Policy 28 'Local Character and Design Quality (Strategic Policy)' and shopfronts guidance; and
 - 4. the proposal integrates with and adds to the physical attractiveness of the area within which it is located, avoiding blank walls and façades.
- C. Major development and/or developments which generate high levels of trips should be located within a town centre boundary *or Site Allocation meeting the requirements of Policy 17 A2*. Elsewhere development within the local centre boundary should serve as more localised provision, which may include opportunities for retail, recreation, and smaller-scale employment uses.
- D. Residential uses will be permitted in centres as follows:
- 1. High density mixed-use development, including residential, will be supported in appropriate locations, as identified within Site Allocations and Policy 45 'Tall and Mid-Rise Building Zones', subject to compliance with Policy 28 'Local Character and Design Quality (Strategic Policy)' and other policies in this Plan.
 - 2. Conversion to residential of upper floors, the rear of ground floor occupied by a commercial or community use will be permitted, where this can be designed to provide a high level of residential amenity without compromising the existing or potential operation of uses on the ground floor.
- E. Existing markets will be protected. New and extended markets will be supported where any negative impacts on the surrounding area (including the operational requirements of existing businesses in the vicinity) can be mitigated.
- F. Where a proposal involves a change of use not supported by policy, the Council will require satisfactory evidence of full and proper marketing of the site. The applicant will be expected to undertake marketing in line with the requirements set out in Appendix 2.
- G. Outside of designated centres proposals should satisfy the Sequential Test as set out in national policy and guidance (including extensions to existing retail and leisure developments of more than 200 sqm gross). When assessing proposals for development outside of existing centres, applicants will comply with the requirements of national policy and guidance in relation to impact assessments. For retail and leisure developments, including extensions, of over 500 sqm gross, the Council will require an Impact Assessment. The scope of such assessments will need to be agreed with the Council before submitting a planning application. Applications that fail the sequential test and/or where the impact assessment (where required) demonstrates significant adverse impact will not be permitted.
- H. Where necessary and justified, the Council will use conditions and/or planning obligations to limit uses consented within Classes E, F1 or F2 in order to achieve the objectives of this policy and to avoid the proliferation of main town centre uses outside of town centres.

Policies Map designations

Primary Shopping Areas as shown in Appendix 1 will be shown on the Policies Map.

Cultural Quarters are shown on the Policies Map as follows:

- Richmond: the area focused on the reference and lending libraries, Museum of Richmond, Richmond Theatre, Orange Tree Theatre, Duke Street Church, with potential to link with uses in the town centre and along the Riverside.
- Twickenham: the area focused on the Civic Centre, York House and Gardens, the Mary Wallace Theatre, Twickenham Museum and Library, with potential to extend into the town centre and along the Riverside.



18.16 This policy builds on the approach set out in the spatial strategy, and accords with London Plan Policies SD6 and SD7, taking a town centre first approach. The types of development appropriate in the five town centres comprise retail development (including warehouse clubs, factory outlet centres and markets); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

18.17 Focusing development in the town centres will result in sustainability benefits, including a reduction in the need to travel by car. Therefore, major commercial development should be located within the defined town centre boundaries (with the exception of retail uses which are encouraged to locate within Primary Shopping Areas).

18.18 Several centres are designated wholly or in part as Conservation Areas. The place-based strategies in section 5, and Policy 45 Tall and Mid-Rise Building Zones identify where there is potential for growth. The Site Allocations include the following sites within the town centres where there may be future opportunities to provide commercial, business

and service uses to serve the local community that enable the centres to grow and diversify:

- Richmond - Site Allocation 25: Richmond Station, Richmond, and Site Allocation 26: Former House of Fraser, 16 Paved Court 20 King Street 4 To 8 And 10 Paved Court And 75 - 81 George Street, Richmond.
- Twickenham - Site Allocation 15: Station Yard, Twickenham , Site Allocation 16: Twickenham Telephone Exchange, and Site Allocation 17: Twickenham Riverside and Water Lane/King Street.
- East Sheen - Site Allocation 37: Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen.
- Whitton - Site Allocation 20: Telephone Exchange, Ashdale Close, Whitton.
- Teddington - Site Allocation 6: Telephone Exchange, Teddington, Site Allocation 7: Teddington Delivery Office, Teddington, and Site Allocation 9: Teddington Police Station, Park Road, Teddington.

18.19 The local centre boundary delineates the smaller centres and parades in the hierarchy, which has been reviewed and is set out in full in Policy 17.

Adapting to change

18.20 To ensure their long-term stability, it is important that town centres and high streets can adapt to changing consumer demands and behaviours and the challenges posed by the growth in online retail.

18.21 There has been a long established policy approach of limiting the change of use away from retail. The Government introduced a significant change to the Use Classes Order in 2020, which combined several different town centre uses including shops, cafés and restaurants, offices, gyms and health centres into one use class- Class E (commercial, business and service) uses. There is a Class F for community and learning uses. Permission is not required to change between any of the uses within the new Class E. The introduction of Use Class E, in removing the distinction between retail and other non-retail

commercial, business and services uses, makes the implementation of this approach challenging in practice; this policy will apply where planning permission is required for a change of use. Notwithstanding this, the Local Plan recognises the benefit of maintaining a concentrated retail core, and therefore has designated Primary Shopping Areas in the larger centres which are the preferred locations for shops on the ground floor of units, and where new retail development is encouraged to locate.

18.22 The NPPF states that, when assessing applications for retail and leisure development outside of town centres which are not in accordance with an up-to-date local plan, local planning authorities should require an impact assessment if the development is over a proportionate locally set threshold. Class E includes a broad range of uses, some of which could have significant detrimental impacts on town centres' vitality, vibrancy and viability. It is therefore necessary to require impact assessments to assess and mitigate potential impacts where appropriate. All retail and leisure developments over 500 sq.m gross (combined) proposed outside or on the edge of designated town, local and neighbourhood centres are required to prepare an impact assessment, including retail and leisure uses which are part of mixed use proposals.

18.23 Applicants will be expected to comply with the sequential test as set out in national and regional guidance. The NPPF states that a sequential test should be applied to planning applications for main town centre uses which are not in an existing centre nor in accordance with an up-to-date plan. In line with the glossary in the NPPF, Important Local Parades in the centre hierarchy are not considered as a centre in relation to the application of this test. For clarity, extensions for retail and leisure developments (which includes mezzanine floors) of more than 200m2 gross should also comply with the test. The locally-set thresholds relating to the impact and sequential tests set out in the policy reflect the type of generally small scale retail applications that come forward in the borough. Sequential test and impact assessments will need to be proportionate to

the scale of the development proposed. Compliance with the sequential and impact tests does not guarantee that permission will be granted; all material considerations, and compliance with the other policies within the development plan, will need to be considered in reaching a decision.

18.24 Where necessary and justified, the Council will use conditions and/or planning obligations to limit uses consented within Class E in order to achieve the objectives of this policy, to meet the scale and type of development needed and maintain the function of the centres, in line with the NPPF and PPG, to ensure the vitality of our town centres.

18.25 The Council's policy approach builds on the Use Class changes to enable flexibility within the centres, recognising the need to re-purpose vacant retail space whilst continuing to maintain a measured amount of comparison and convenience shopping floorspace in the Primary Shopping Areas to ensure continued vitality and viability.

18.26 It is also considered vital, to continue to promote local opportunities for shops and services within 400 metres of most people's homes, in order to meet the principles of "living locally", which is a key theme of the Local Plan. To this end, the Plan seeks to protect a small number of specific shops which are needed for essential top-up shopping or are businesses providing services which generally need to be visited in person, unless there is genuine alternative provision as detailed in Policy 20.

Diversifying our centres

18.27 It is recognised that for our centres to continue to thrive, there is a need for diversification and adaptation, including new innovative forms of retailing, accommodating new space where there is identified demand and managing new development and the transition of any surplus retail floorspace to other uses, such as cultural and business. The Council supports the enhancement of quality leisure and cultural uses that contribute to activities during the day and night and appropriately manage the impacts of such uses, in accordance with Policy 19 Managing impacts.

18.28 The spaces within and around our centres can have an important public function, with high streets, public squares, parks, gardens and other open spaces providing opportunities for people to meet and socialise. When considering the quality of place, key factors to be considered are design of shopfronts, accessibility regardless of ability and safe places. The Council will work with partners to promote a quality urban realm by promoting a Healthy Streets approach in developments, as set out in Policy 1 Living Locally.

18.29 The borough has a rich cultural offer, linked with its heritage assets and opportunities for leisure and recreation, providing for residents and visitors, and attracting tourists. The Council's Culture Richmond 2021 to 2031 sets out the vision for an innovative and sustainable cultural offer, with our arts, library, parks, sport and fitness services more closely aligned to broader culture priorities. Many venues and facilities identified in the place-based strategies in section 5 of this Plan, and on the London Cultural Infrastructure Map. London's Arcadia including Kew Gardens, parks, historic buildings and landscapes between Hampton Court and Kew along the River Thames are referred to in paragraph 7.5.12 in the London Plan.

18.30 The London Plan Policy HC5 sets out that development plans should identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters; especially where they can provide an anchor for town centre renewal, and identify, protect, and enhance strategic clusters of cultural attractions. Although dispersed across the borough, there are clusters of existing facilities in the town centres. In particular, Richmond and Twickenham have been identified in this Plan as Cultural Quarters, and other centres have existing clusters of cultural facilities and creative industries. These create an attractive and vibrant area for residents, workers and visitors, as well as reflecting the local character and distinctiveness of our places. There is the potential to grow this cultural and community offer, to help with diversifying our

centres, and for our centres to act as gateways and hubs connecting places through active travel. Town centres may be the point where visitors arrive at a station and can then access other cultural attractions by walking or cycling or river transport.

- 18.31** Whilst residential uses can contribute to the overall vitality of a centre, housing on the ground floor contributes less to vitality than most commercial or community uses. Therefore, commercial or community uses will be expected to front the street. There is a growing trend to convert the rear of premises to residential use. Where conversion is acceptable, the access to any residential unit should be from the front rather than the rear where practicable. Any residential proposed will need to address the requirements of other policies in the Plan including Policy 13 Housing Mix and Standards, Policy 46 Amenity and living conditions.

- 18.32** Residential development contributes to the overall health of centres and to meeting the Borough's housing target. London Plan Policy

SD6 part D sets out the suitability of town centres to accommodate a diverse range of housing, including smaller households, Build to Rent, older people's housing, if in accordance with Policy 12 Housing Needs of Different Groups. There is scope to increase housing stock in the centres, such as through increased densities or introducing housing in upper floors, provided that this does not lead to an unacceptable loss of commercial or community space, and that the commercial or community uses on the ground floor remain of a viable size, with adequate facilities and servicing.

- 18.33** Existing markets will be protected and new and expanded markets supported in line with the NPPF and the London Plan (Policy E9). The latter must demonstrate how potential negative impacts are to be appropriately mitigated, including impact on the vitality of nearby centres.

Policy 19

Managing the Impacts of Development on Surroundings

- A. The Council will support proposals which contribute to cultural and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in our centres, and will manage the impacts by ensuring that:
1. new proposals and extensions to existing uses should be of a type and size appropriate to their location, the hours of use proposed, the nature and character of the area; and
 2. where there are proposals for new residential properties and they are located in close proximity to established or planned uses with late night licences or other existing noise or nuisance-generating businesses or community activities, the proposed residential use will need to demonstrate that it is capable of mitigating its impact, on established uses and future occupiers.
- B. Proposals for evening and food and drink uses should be accompanied by a management plan, including mitigation measures for any negative impacts of these uses. Impacts such as noise and light pollution on local wildlife and biodiversity should be considered through appropriate location, design and scheduling. Applications for food and drink uses where home delivery of food is proposed should include a Delivery and Servicing Plan to enable assessment of impacts.
- C. The use of outdoor areas including garden areas, rooftops, forecourts and pavements in association with food and drink uses will be supported only where: