

LONDON BOROUGH OF RICHMOND UPON THAMES
LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC
WRITTEN STATEMENT

MAIN MATTER 14: Shaping and Supporting Our Town & Local Centres
(Policies 17 - 20)

Wednesday 3 July 2024

COUNCIL RESPONSES TO MAIN MATTER 14

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Abbreviations

GLA – Greater London Authority

LP – The London Plan

NCMP - National Child Measurement Programme

NHS - National Health Service

NPPF – National Planning Policy Framework

OHID - Office for Health Improvement and Disparities

PPG – Planning Practice Guidance

PTAL – Public Transport Accessibility Level

RLP – Richmond Local Plan

RLNS – Retail & Leisure Needs Study

14.1 Are the requirements set out in Policies 17 - 20 justified by appropriate available evidence, having regard to national guidance, and local context, and meeting the requirements of the London Plan?

The requirements of the policies in Chapter 18 ‘Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic’ are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

The primary sources of evidence that have shaped these policies and thoroughly examined the local context are as follows:

- **Richmond Retail and Leisure Needs Study**
 - Retail & Leisure Needs Study Phase 1 Update (July 2021) (RLNS Phase 1) (SD-059)
 - Retail & Leisure Needs Study Phase 2 Final Report (January 2023) (RLNS Phase 2) (SD-060)
 - Retail & Leisure Needs Study – Update Addendum (April 2024) (PSED-02)

In preparing this evidence a staged approach has been adopted to respond to rapid structural changes in the economy including the implications of the Covid-19 pandemic. These reports include a quantitative assessment of need for retail and food and beverage uses and translate that forecast need into a floorspace requirement/surplus. The RLNS Phase 2 Report includes a qualitative assessment including audits of the five town centres and analysis of local centres. It also includes an assessment of need for other main town centre uses including commercial leisure, entertainment and cultural uses. The RLNS – Update Addendum provides the latest position in relation to the need for retail and food and beverage uses adopting forecast that now reflect, for example, the cost of living crisis.

- **Assessment of Borough Centres 2023** (SD-065), published in four volumes plus a summary:
 - Volume 1: Assessment of Town Centres (May 2023)
 - Volume 2: Assessment of Local Centres (May 2023)
 - Volume 3: Assessment of Neighbourhood Centres (May 2023)
 - Volume 4: Assessment of Local Parades (May 2023)
 - Assessment of Borough Centres 2023: Summary (May 2023)

This research robustly assessed the centres in the borough hierarchy using a wide range of indicators (with reference to PPG, Planning for town centre vitality and viability, paragraph 006) and data sources. Its purpose was to:

- review the centre hierarchy – ensuring that centres were categorised in the correct tier;
- review centre boundaries where they existed and define them for centres where they did not; and to
- consider the need for Primary Shopping Areas and define these boundaries for the five town centres.

As part of this assessment a clear picture of the land use composition, available provision of shops and services (categorising those defined as essential and useful) and capacity for development was produced for each centre. Careful consideration was given to the following:

- place-based strategies in the Plan;
- the findings of other research forming part of the Local Plan evidence base, particularly the Urban Design Study 2023 (SD-052) and Employment Land And Premises Needs Assessments (SD-057 & SD-058);
- the recommendations and findings of the RLNS (SD-059 & SD-060) in relation to the hierarchy and to the advice on accommodating growth and the relationship with Site Allocations and Article 4 Directions made by the Council¹;
- the location of expected growth in housing (housing completions/ commitments of 50 or more units);
- the role the centre has in meeting need for:
 - convenience provision (including beyond the borough boundary), identifying centres which are particularly important in meeting this need and where gaps in provision were identified;
 - those communities who live in areas classified as more disadvantaged²;
 - those communities living in areas least accessible by public transport³

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² According to the English Indices of Multiple Deprivation 2019 [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/812222/English-indices-of-deprivation-2019.pdf)

³ A PTAL rating of between 0 and 2 is considered to equate to low public transport accessibility for this exercise.

and consideration of the correlation between these factors;

- the aspirations of the community, derived from various consultations and engagement, of partners and stakeholders taking into account existing plans and strategies and progress with projects funded by the Public Realm Improvement Fund
- where data were available to compare centres to others, with reference to the Mayor’s Network of Town Centres (see London Plan, Annex 1).

The methodology is fully explained in Section 3 and Appendix 1 (Technical Appendix) of Volume 1.

- [Vacancy Rates in the Borough’s Centres 2023 \(Town Centre Land Use Survey\) \(January 2024\)](#) (SD-088) which allows for on-going monitoring of centres, informed by up-to-date land use data from the Council’s annual survey of ground floor occupiers of borough centres.

It is noted that part of the Council’s role is to promote centres and work with its partners to improve them, including via public realm improvements. The Council has been actively involved in taking forward a vision for Richmond town centre to ensure it remains competitive and vibrant. A town centre study has been produced by the Council’s delivery partner following engagement in August to October 2023 and an action plan is to follow⁴.

Borough centre hierarchy and pattern of provision

Chapter 18 sets out policies for the adaptation, growth and management of the borough’s centres and important local parades to ensure that the vitality, vibrancy and uniqueness of each is promoted, enhanced and strengthened. This approach is in line with Paragraph 86 (a) of the September 2023 NPPF / 90 (a) of the December 2023 NPPF and in particular Policy SD 6 of the London Plan.

Policies are positive and provide enough flexibility to allow centres to respond to changes in how we shop and spend our leisure time and how we use our centres post-pandemic, so that they will meet the needs of the community and visitors now and in the future.

Collectively they form an effective and much-valued network which is fundamental in implementing the strategic vision of the Plan – by facilitating the ability to “live locally” (Policy

⁴ https://www.richmond.gov.uk/vision_richmond_town_centre

1 - Living Locally and the 20-minute neighbourhood) as referenced in the Council’s response to Main Matter 2 and explained in more detail below.

Paragraph 86 (a) of the September 2023 NPPF / 90 (a) of the December 2023 NPPF requires Local Plans to define a network and hierarchy of town centres and to promote their long-term vitality and viability. It is important to plan the borough hierarchy of centres and parades, each one with a recently reviewed or defined boundary as shown on the Policies Map (SD-010), so that it is clear where commercial and community uses should be retained and encouraged and where development /investment will be concentrated in line with the sequential approach. Review of town centre boundaries is required by paragraph 86 (d) of the September 2023 NPPF / NPPF / 90 (d) of the December 2023 NPPF and by Section B (3) of Policy SD 7 of the London Plan where necessary. Up-to-date boundaries are also important in terms of identifying which centres are to be considered in relation to the application of this test.

In the Plan, the hierarchy is set out in Table 18.1 and in paragraphs 18.2-18.7 it is described in some detail. The first tier in the hierarchy is comprised of the five town centres of Richmond, Twickenham, East Sheen, Teddington and Whitton. Richmond is the borough’s largest centre with a borough wide catchment and is classed as a major centre in the Mayor’s Town Centre Network (see London Plan, Policy SD8 & Annex 1).

Table 1: Classification of centres according to the Mayor’s Town Centre Network

centre	Classification	Night-time economy classification	Commercial growth potential	Residential growth potential	Office guidelines
Richmond	major	NT2	High	Incremental	A/B
Twickenham	district	NT3	Medium	Incremental	B
East Sheen	district	-	Medium	Incremental	C
Teddington	district	NT3	Low	Incremental	C
Whitton	district	-	Low	Incremental	-

The four remaining town centres are of a size and function which warrants their continued classification as district centres in the Mayor’s network. A summary analysis of the network of centres was presented in Section 3 of the RLNS Phase 2 Report with detailed centre health checks set out in Appendix 5. A further analysis of town centres was set out in detailed assessment in Volume 1 of SD-065. Below this level in the borough hierarchy are 7 local centres, providing a good range of shopping, facilities and services and in most cases a cultural & leisure offer. There are 9 neighbourhood centres also providing shops and

facilities to meet local needs on a smaller scale and 14 parades of local importance, serving very local but vitally important local needs. These lower order centres/parades were assessed in Appendix 6 of the RLNS Phase 2 report and then in Volumes 2 and 3 of SD-065.

Policy 17 develops the Plan's spatial strategy (set out in detail in Chapter 4 of the Local Plan) ensuring that development coming forward will be directed into centres and parades which is of an appropriate scale for that centre. This is very much in line with the long-standing national 'town centre first' approach. Policies 17 & 18 seek to steer major new development/ development which generates a high number of trips into the five main town centres or be located in an appropriate Site Allocation, provided that the retail proposal is in line with that allocation and in accordance with other plan policies ([see Policy 17 A 2, and proposed cross-reference to it in Modification P18.1 in Table below](#) and LBR-002 (Schedule of Modifications), and Policy 18 B 1). In line with national policy, Policies 17 and 18 also recognise the need for centres to diversify in order to respond to rapid changes in the retail and leisure industries.

Accommodating town centre uses in locations where customers are able to undertake linked trips contributes to sustainability objectives by reducing the need to travel. This is a long-standing aim of national policy. The RLP has been subject to, and informed by, the process of Sustainability Appraisal (SA), as set out in the Council's response to Main Matter 1 and question 1.3.3, and the updated Sustainability Appraisal (June 2023) (SD-002) notes how the policies encourage centres to thrive, and how alternative policy options are limited in the borough context. In this way, the benefits of new development will serve to reinforce the vitality and viability of existing centres. Positively prepared policies recognise that the pandemic has accelerated structural change to the retail and leisure sectors which was already occurring. This change has provided an opportunity which can be capitalised on, to maintain and support our centres, as we learn anew to appreciate and use our local areas.

The Council has carried out robust and detailed research into the health and role of each centre in the hierarchy (SD-065) referred to above. This report clearly sets out the criteria used to review the hierarchy to ensure that each centre is classified correctly (Section 3 of Volume 1 of SD-065). In this document each centre has been carefully assessed using a data-driven methodology which as mentioned above takes account of health check indicators included in the PPG (Planning for town centre vitality and viability, paragraph 006). It also draws on town centre audits and a health assessment of local centres included in the RLNS Phase 2 (SD-060). The Council considers comments raised in the Regulation 19

responses regarding the hierarchy and evidence base (Rep No. 388) have been addressed by the above.

The spatial distribution of centres means that most residential areas in the borough are within 400 metres of essential convenience provision, which is a long-standing aim of local planning policy. This is confirmed by the detailed Assessment of Borough Centres reports (SD-065) which mapped convenience provision and analysed the role of centres in providing for essential needs. There are other factors taken into consideration in building up a picture of the composition, role and health of centres which are detailed in this report and outlined at the beginning of this document. The report provides sound evidence to review the hierarchy.

The Summary document (SD-065) provides an overview for each of the centres. Only one change to the existing hierarchy is proposed. Twickenham Green is considered to have developed sufficiently to be “promoted” to a neighbourhood centre.

For completeness, it is noted that further retail provision is provided in a number of out centre locations across the borough including Sainsbury superstores at Uxbridge Road Hampton and Manor Road/ Lower Mortlake Road Richmond, a range of retailers including Marks and Spencer at Kew Retail Park, as well as provision beyond the borough boundary, notably the Tesco Extra in Isleworth.

It is considered that there is appropriate evidence to justify the centre hierarchy which reflects the Mayor’s network, and the broad policy guidelines identified (London Plan Policy SD8 & Annex 1).

Identifying and meeting need

The above explains the centre hierarchy, the pattern and types of centres in the borough and outlines the spatial strategy. The evidence suggests that less convenience and comparison goods retail floorspace will be needed in the future due to the continued growth in home shopping and sales densities. As a result a more flexible approach which focuses on repurposing and adaption is needed which is in line with the NPPF in particular, paragraph 86 (a) of the September 2023 NPPF / 90 (a) of the December 2023 NPPF which states that policies should allow centres “to grow and diversify in a way that can respond to rapid changes.” The London Plan also embraces the need for more flexibility in particular at policy SD 6 B & D.

The Council has commissioned and undertaken extensive research to establish the need for retail and leisure uses and more widely for employment and housing and other needs as required by Paragraph 86 (d) of the September 2023 NPPF / Paragraph 90 (d) of the

December 2023 NPPF, and the plan policies and Site Allocations ensure that these anticipated needs are met. The Council considers that there is up-to-date, robust and co-ordinated evidence to support the Local Plan. More detail on this is provided in the Council's responses to Main Matter 1 and Main Matters 4-12 (Overarching Statement relating to Place-Based Strategies) which also updates the current position of the Site Allocations where relevant. The Council considers that these documents address comment raised in the Regulation 19 responses (Rep No. 395) from Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green).

Lichfields were commissioned by the Council in May 2021 to produce a retail and leisure needs study, including a qualitative and quantitative assessment of forecast need for floorspace. Recognising that there has been a period of unprecedented change in the retail sector, with changes to shopping habits accelerated by the COVID pandemic and associated lockdowns and more recently the effect of the cost of living crisis, the Council considered it prudent for the evidence to be produced in two phases. Thus, the latest data could be used in the forecasting model such as, expenditure estimates and allowances for increased floorspace efficiency. To this end the RLNS Phase 1 Report (SD-059) was published in July 2021 and the more detailed Phase 2 Report (SD-060) in January 2023⁵. The need assessment in the Phase 2 Report adopted the results of a comprehensive household survey conducted in May 2022, which was used to model shopping and leisure patterns. In the interests of having the very latest capacity projections available in advance of the Examination hearings, an Update Addendum was also produced and published in April 2024 (PSED-02), which takes account of the latest Experian economic forecasts, published in February 2024. The results of the May 2022 household survey remain robust because there have been no significant changes in retail provision within or near the study area since that date.

Forecasts from the Update Addendum are included in the Table 2 below.

⁵ Please note that an error in apportioning the figures in the Phase 2 Report is acknowledged in the Update Addendum in paragraph 3.1. The revised capacity forecasts in the Update Addendum supersede those presented in the Phase 2 Report.

Table 3.1 Summary of retail and food/beverage floorspace capacity up to 2029 (sq.m gross)

Zone	Convenience retail	Comparison retail	Food/ beverage	Total
1 – Richmond	-284	-233	803	286
2 – Twickenham	-483	-343	449	-377
3 – Whitton	-53	-27	57	-23
4 – Teddington	-155	-166	493	172
5 – Hampton/ Hampton Hill	-274	-52	59	-267
6 - Kew/ North Richmond	-111	-12	177	54
7 – Barnes/ East Sheen	-76	31	590	545
Total	-1,435	-803	2,628	390

Table 3.2 Summary of retail and food/beverage floorspace capacity up to 2034 (sq.m gross)

Zone	Convenience retail	Comparison retail	Food/ beverage	Total
1 – Richmond	-237	-73	2,031	1,721
2 – Twickenham	-850	-718	777	-791
3 – Whitton	-93	-57	99	-51
4 – Teddington	-288	-371	860	201
5 – Hampton/ Hampton Hill	-475	-103	131	-447
6 - Kew/ North Richmond	67	139	481	687
7 – Barnes/ East Sheen	-65	61	1,112	1,108
Total	-1,940	-1,122	5,491	2,429

Table 3.3 Summary of retail and food/beverage floorspace capacity up to 2039 (sq.m gross)

Zone	Convenience retail	Comparison retail	Food/ beverage	Total
1 – Richmond	-94	10	3,324	3,240
2 – Twickenham	-975	-817	1,315	-477
3 – Whitton	-100	-63	178	15
4 – Teddington	-141	-166	2,034	1,727
5 – Hampton/ Hampton Hill	-456	-114	207	-363
6 - Kew/ North Richmond	93	152	649	894
7 – Barnes/ East Sheen	-158	-44	1,386	1,184
Total	-1,831	-1,042	9,094	6,221

Table 2: Floorspace forecasts

Source: RLNS Update Addendum (PSED-02).

Please note Modification P17.1 in [Table 4](#) at the end of this document which updates the text of the Plan to reflect the revised forecasts.

Please note correction to the Update Addendum Report – Paragraphs 2.32 and 3.1 (last bullet point) which states that in relation to the food and beverage forecast there is a predicted **over-supply** of 7,722 sqm, rather than correctly stating an **under-supply**. [The updated projected food and beverage floorspace under-supply at 2039 has increased from 7,722 sq.m gross to 9,094 sq.m gross.]

The Council is confident that its robust approach provides a clear picture of need. However, it is noted that longer-term forecasts (2039) are less reliable as noted in the RLNS itself (see paragraph 3.6 of the Update Addendum PSED-02) and they will be kept under review.

The RLNS Phase 2 Report (SD-060) also included an assessment of the need for other town centre uses including commercial leisure (see Section 5). The report's conclusions can be found in paragraphs 5.47 to 5.50. It is suggested that "*future expenditure growth could support new commercial leisure and cultural floorspace in LBRuT of:*

- *about 5,000 sq.m by 2034; or*
- *about 7,500 sq.m by 2039.*" (para 5.48 of SD-060)

Overall conclusions of the RLNS and Update Addendum recommend a flexible approach which can respond to opportunities and consider reoccupation of vacant space. The revised capacity projections suggest that there is no pressing requirement to allocate sites for major retail development in order to accommodate projected growth over the plan period (noting the Council's response to Main Matter 2 and question 2.2 which addresses generally the plan period and the circumstances including changes to long-term trends which would lead to a plan review). The priority is to facilitate the reoccupation of vacant shop units (vacant units were estimated to be at least 22,000 sq.m gross in the RLNS Phase 2), potentially for non-retail uses including food/beverage outlets, leisure, entertainment and cultural uses. Based on a reasonable reduction in vacancy rates, vacant floorspace could theoretically accommodate most of the need for new town centre uses up to 2039. A reduction in the vacancy rate from 8.9% to 7% was estimated to accommodate new uses of about 5,000 sq.m gross.

Paragraph 3.8 of the Update Addendum (PSED-02) notes that the borough vacancy rate has reduced from 8.4% in 2022 to 8.1% in 2023 which "*suggests a continued reduction in the shop vacancy rate to 7% in the future can be achieved*. It goes on to say, "*On this basis, the continued reoccupation of vacant units, could meet most of the projected combined retail and food/beverage floorspace under-supply up to 2039 (6,221 sq.m gross)*. In paragraph 3.9 the Update Addendum states that "*The updated capacity assessment confirms the proposed*

policy approach in the emerging Local Plan remains robust and sound.” As such, the priority is to direct main town centre uses into the borough’s centres.

Paragraph 86(d) of the September 2023 NPPF / 90 (d) of the December 2023 NPPF looks to planning policies to set out a range of suitable sites in town centres to meet the scale and type of development anticipated to be required over the following decade, and to review town centre boundaries if sufficient sites are not available where site availability is identified as an issue. As set out above, the evidence suggests that the fulfilment of any required growth should be directed towards centres, vacant units and existing opportunities that exist.

The Plan recognises the need for flexibility and encourages local development opportunities for both retail and other main town centre uses in individual centres where they are able to maintain and enhance the overall health of a centre, including through the redevelopment, refurbishment or the appropriate expansion of sites. Policy 17 refers to the Place-based strategies in the Plan and lists the Site Allocations in town centres (paragraph 18.18). Guided by the place-based strategies the Plan seeks to unlock the potential of and embrace the individuality of centres.

Paragraph 18.10 explicitly recognises that not all development can be accommodated in re-purposed space and that the Primary Shopping Areas are tightly drawn (18.12). The Plan includes a number of Site Allocations which contain town centres uses, including retail, as part of their development/ redevelopment.

Please note that this recognition and the updated need assessment in the RLNS – Addendum are considered to address comments (388 in SD-014) on this matter made by Mark Knibbs (Avison Young with input from Montagu Evans & Energist) OBO St George plc and Marks and Spencer.

Comments (277 under Site Allocation 31 – Kew Retail Park in SD-014) by the same respondent which are relevant and addressed here. They refer to the qualitative need to improve convenience provision in Kew to provide for a main food shop in order to achieve “living locally” (Policy 1). The Council considers that the “Living Locally” concept would not encompass the provision of main food shopping opportunities for all residents within a short walk or cycle of their homes, rather it is aimed at “*giving people the ability to meet most of their daily needs*” (Policy 1). See Written Statement for Matter 2 for more detail on the concept. The May 2022 household survey results suggested 20.3% of households did their main food and grocery shop via the internet/delivery. Of those who travelled for main food and grocery shopping, 62% travelled by car and a further 8% travelled by bus. These results

indicate very few households across the borough undertake their main/bulk food and grocery shopping on foot. The household survey results also indicate comparable or higher levels of convenience goods expenditure retention in the Zone 6 – Kew / North Richmond when compared with other zones. Within study area Zone 6, 54.6% of convenience goods expenditure was retained and spent within the zone. The average across all 6 study area zones was only 50.4%. The household survey results indicate there is a high degree of convenience goods expenditure flows to and from each zone and this is not unusual for London boroughs. The evidence suggests there is no quantitative or qualitative need for additional convenience goods provision in the Kew local area.

Furthermore, forecasts referred to in detail above, indicate there will be a surplus in convenience goods retail floorspace over the Plan period, albeit it that an overall contraction of centre boundaries is not expected. There is a projected global over-supply of 1,831 sq.m gross of convenience goods retail floorspace in 2039 in the borough as a whole. Within Zone 6 – Kew North Richmond there is a very small projected under-supply of only 93 sq.m gross in 2039. Local shopping opportunities already exist at Kew Retail Park (and at Kew Gardens local centre, Kew Green and Sandycombe Road local parades).

Indeed, the evidence provided by the Retail and Leisure Study Phase 2 (SD-060) and the Assessment of Borough Centres (SD-065) in terms of assessing and mapping available provision indicate that there is reasonable provision of local shopping opportunities across the borough. It is the view of the Council that the impact of an increased convenience offer at Kew Retail Park is best assessed through a Retail Impact Assessment at the planning application stage.

See Main Matters relating to Place-Based Strategies for further detail on specific Site Allocations, in particular Site Allocation 31: Kew Retail Park.

It is considered that the need for new retail and leisure developments can be met and effectively delivered over the plan period.

Policy approach

Policies in this Chapter are summarised as follows:

- Policy 17 - Supporting our centres and Promoting Culture is the strategic policy which set out the borough's centre hierarchy and aims to support centres and the growth and adaption, creating places which are well designed and beautiful. It includes:
 - that development should be appropriate for the centre in terms of role and scale
 - that development should comply with the sequential test

- Primary Shopping Areas for the five town centres (displayed on the policies map)
 - protection for essential shops where required by Policy 20
 - support for diversification and re-purposing
 - policy to maintain existing commercial uses on the ground floor but recognising the contribution housing makes to the vitality of centres
 - policy which seeks provision of high quality environments and the connections between them
 - definition of Cultural Quarters in Richmond and Twickenham (as displayed on the Policies Map)
- Policy 18 – Development in Centres - provides more detail on determining applications coming forward including in relation to the national policy tests and locally-set thresholds for their application. It sets out the approach towards retaining markets, marketing requirements for this policy and the use of conditions.
 - Policy 19 – Managing the Impacts of Development on Surroundings. Whilst the Council supports cultural and creative activities, some proposals can have negative impacts. This policy deals with mitigation of such impacts, including where there is an over-concentration of similar uses. It refers to the London Plan's agent of change principle and the relationship to the Council's Licensing Policy. It cross refers to Policy 51 in relation to new takeaways within 400 metres of a school.
 - Policy 20 – Shops and Service Serving Essential Needs. Protection for defined essential shops and services where appropriate including pubs, bars and drinking establishments.

Primary Shopping Areas (PSAs)

Paragraph 86 (b) of the September 2023 NPPF / 90 (b) of the December 2023 NPPF states that planning policies should include town centre and PSA boundaries and relate policies to them. Section C (1) of London Plan Policy SD 7 also states that boroughs should include policy-related designations in their development plans, which can include PSAs.

Both town centre boundaries and PSA boundaries are displayed on the Policies Map (SD-10). Each centre below town centre level in the borough hierarchy has a local centre boundary to which Policies 17 & 18 relate and are also displayed on the Policies Map, and shown on the Key Diagram in the Plan.

PSAs have been defined in the five town centres only, after careful consideration (See Assessment of Borough Centres SD-065) taking into account the distribution of land uses in particular by categorising and mapping of retail uses, the location of vacancies and the Plan's place-based strategies for centres. PSAs have been tightly drawn.

Paragraph 18.12 of the Plan explains in detail why PSAs are needed, despite the forecast oversupply of retail floorspace. In short, the borough's town centres have a comparison shopping role which is an important component of their overall offer, function and attractiveness, assisting in meeting the needs of the community and important to retaining a centre's market share and overall vitality. Comparison shopping benefits from a compact retail core which fosters browsing.

Residential use in centres

The NPPF, at paragraph 86(f) (September 2023) / paragraph 90 (f) (December 2023), encourages boroughs to recognise the role that residential uses can play in contributing to the overall health and vitality of a centre. London Plan policies SD6 and SD7 also support housing in town centres.

Policies 17 and 18 seek to retain ground floor commercial and community uses, but recognise the contribution that housing makes to the overall vitality of centres, in assisting in optimising sites and meeting need and so promotes housing where appropriate.

The Council recognises the growing trend to convert the rear and upper floors of premises from commercial and community uses to residential use. Such development is supported, provided that a high level of residential amenity can be achieved without compromising the existing or potential ground floor use.

Culture and leisure

The NPPF sees town centre uses as including leisure, arts, cultural and tourism development and supports the provision of cultural infrastructure and cultural well-being for all sections of the community (see in particular paragraph 96-97 in the NPPF (December 2023)). The NPPF also indicates planning policies should allowing allow centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries.

The London Plan policies HC6 and SD 6 support cultural uses and "vibrant activities" including in the evening and at night and the Mayor's network includes classification of centres in terms of the night-time economy:

- NT1 – Areas of international or national significance (none in the borough)
- NT2 – Areas of regional or sub-regional significance (Richmond)
- NT3 – Areas with more than local significance (Twickenham and Teddington)

The Council is developing a Night-Time Strategy for the borough⁶, with initial consultation having taken place in Summer 2023, which will reflect aspects of Policy HC6 of the London Plan. Further consultation on a Draft Strategy is expected to take place over summer 2024, with adoption anticipated for late 2024/early 2025. Comments have been made to the consultation of the Regulation 19 Local Plan (Reps 397 and 239, Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green) and Julie Scarr respectively) expressing concern in policies to encourage the night-time economy and seeking differentiation between evening and night-time uses. It is considered that the Council's planning and licensing policies are sufficiently robust to ensure residential amenity is taken into account when development is proposed. The Night-time Strategy is expected to support the Council's aspirations to support the night-time economy whilst being respectful of the environment. It aims to create a more inclusive night-time for all, one that is affordable and accessible for groups that currently feel excluded from the borough's night-time offer. The Strategy will enable a comprehensive approach that balances residents' needs whilst dealing with a range of issues, including overall safety at night and providing amenities for night workers.

Policy HC 5 supports cultural and creative industries and Part A 2) specifically relates to the definition of Cultural Quarters.

The RLNS Phase 2 Report (SD-059) predicts an increase in the floorspace needed for Food & Beverage uses ([Table 2 above](#)) and recognises the potential to increase commercial leisure in the borough. Policies 17 and 18 support the enhancement of this offer. Indeed it is recognised that the borough has an existing strong and unique cultural offer which the Council and its partners promote and foster (see paragraph 18.20 of the Plan).

Policies 17 & 18 define Cultural Zones in Richmond and Twickenham which are displayed on the Policies Map (SD-10). They, and smaller cultural clusters in other centres, are to be enhanced providing that adverse impacts arising from the proposals can be suitably managed - that proposals comply with Policy 19 and other plan policies. There is potential to

⁶ https://www.richmond.gov.uk/news/august_2023/improve_the_night_time_economy

grow this sector, which will help diversify our centres, support their vitality and potentially enhance their individuality.

Markets

Policy 18 E seeks to protect markets and to extend or create new ones subject to negative impacts being mitigated and responds to the requirement set out within the NPPF, at paragraph 86(c) (September 2023)/ paragraph 90 (c) (December 2023), to retain and enhance existing markets and, where appropriate, re-introduce or create new ones, and is in general conformity with London Plan Policy E9 which looks to support London’s markets.

Essential shops and services

Paragraph 92 and 93 of the September 2023 NPPF / 96 and 97 of the December 2023 NPPF state that planning policies should support the provision of local shopping and services. In particular, paragraph 93 c) of the September 2023 NPPF 97 c) of the December 2023 NPPF that “*planning policies and decisions should:...*

c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;

There are no representations to the consultation on the Regulation 19 Plan in relation to Policy 20. Please note Modification FPM 1 in [Table 5](#) proposed to provide further clarity regarding implementation.

Conclusion

Policies 17-20 are considered to be in accordance with the NPPF and in conformity with the London Plan. It is noted that the GLA have not raised any concerns or representations regarding these policies and it is therefore considered that these policies are in general conformity. There is a robust and detail evidence base which examines the local context and informs the policy approach taken.

14.2 Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

The Council’s response to Main Matter 1 sets out the general context for the Plan as a whole providing clear direction for a decision-maker. It is considered that policies 17 to 20 are clear and implementable. Elements of these policies build on a long-standing policy approach of supporting centres and providing for local needs.

In light of all the evidence gathered as outlined under question 14.1, significant changes were introduced in the Publication (Regulation 19) Plan to update the policy approach. This reflects the Government's amendments to use classes which have enabled greater flexibility to change between certain types of commercial, business and service uses. Some issues raised in the responses to the Publication Local Plan (Regulation 19) consultation generally noted the changes to the retail sector. The approach of moving away from designated shopping frontages and towards retention of commercial and community uses (and specifically retail within the PSAs) within a defined boundary is a clear one and can be easily understood by decision makers and applicants alike, with no comments raised in the responses to the Publication Local Plan (Regulation 19) consultation on the proposed town and local centre boundaries or the primary shopping areas.

National tests

Policies in the Plan are in accordance with the NPPF and in conformity with the London Plan in terms of the sequential and impact tests. Paragraph 90 of the September 2023 NPPF / Paragraph 94 of the December 2023 allows local authorities to set local floorspace thresholds for the impact test. Lichfields have advised that a local threshold of 500 sq.m gross (see paragraphs 6.50-6.62 of the RRLS Phase 2 Report SD-060) is appropriate for the borough, taking into account the ⁷[OBU], and is a continuation of the adopted Local Plan approach. This threshold is consistent with the 280 sq.m net Sunday trading threshold and reflects the relatively small scale of development expected to come forward in the borough.

The sequential test applies to main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan (Paragraph 91 of the NPPF (December 2023) unless paragraph 93 applies. Policy 18 introduces a threshold for its application in the borough which allows for some very modest increase in floorspace of existing businesses providing some flexibility for those businesses and may assist in supporting the living locally aim (Policy 1).

It is noted that Mark Knibbs (Avison Young with input from Montagu Evans & Energist) OBO St George plc and Marks and Spencer have made comments (Rep No.s 388 and 391) on the Plan in relation to Policies 17 and 18 requesting Site Allocations be expressly mentioned as appropriate locations for major retail and leisure. The Council has responded in the

⁷ <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres> Paragraph: 015 Reference ID: 2b-015-20190722

Schedule of Responses to the Publication Local Plan (Regulation 19) Consultation (SD-014). The Regulation 19 Plan was amended to refer to Site Allocations subject to the need for the proposal to meet the requirements of that Site Allocation including in terms of scale of retail and to comply with other Local Plan policies at Policy 17 A 2 and Policy 18 B 1.

In response to Rep No. 392, in the Schedule of responses to the Publication Local Plan (Regulation 19) consultation (in plan order) with the Council's response (January 2024) (SD-014) the Council suggested a further modification. P18.1 is included in the Schedule of Proposed Modifications (LBR-002) and in Table 4 below, adding a cross-reference to Policy 17 A 2 for consistency, to clarify that major trip generating development should be located within town centres or Site Allocations meeting the requirements of Policy 17.

14.3 Policy 19 (D) Is the term “over-concentration of similar uses” sufficiently defined?

London Plan Policy E9 C7 states that Development Plans should “*manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives*”.

This element of policy is a long-standing part of local policy which was included in the adopted Local Plan (Policy 26 Part C) and found acceptable by the previous EIP Inspector.

It is acknowledged that this is a subjective assessment and could apply to part of or all of a centre, if that centre is of a sufficient size. It allows the cumulative impact of several uses, such as take aways or betting shops, to be considered. The list of uses included in Policy 17 to which this assessment could apply is not exhaustive which allows for flexibility of application, including taking account new types of uses which may come forward in the future.

There is a good deal of overlap between certain food & beverage orientated uses, for example a public house with a significant food offer, or a restaurant offering a significant take-away service.

The Council supports the enhancement of leisure and cultural uses and the forecasts in the Retail and Leisure Needs Study - Update Addendum (PSED-02) suggests that the amount of floorspace in the Food and Beverage sector in particular is likely to increase over the plan period. It is also likely that more people will live in the borough's centres in the future. Therefore, it is pertinent to consider the impacts of new uses, including their cumulative impact, on centres and residents.

Policy 18 (9) provides a cross reference to Policy 19 which is more detailed in terms of the policy position and the assessment of the impacts of proposals.

The supporting text to Policy 19 also includes reference to the Council's Licensing Policy and related defined Cumulative Impact Zones.

Note Modification P19.1 as set out in LBR-002 and set out in [Table 4](#) below which brings the policy more closely in line London Plan policy D13 in response to Rep No. 396 by the Theatres Trust in the Schedule of responses to the Publication Local Plan (Regulation 19) consultation (in plan order) with the Council's response (January 2024) (SD-014). Overall the policy is felt to provide an appropriate framework to manage impacts which addresses Rep No. 397.

14.4 Is the proposed 400m school exclusion zone for fast food takeaways (Policy 19 (D)) justified by appropriate available evidence?

Paragraph 8 of the September 2023 NPPF / and December 2023 NPPF seeks to use the planning system to promote strong, vibrant and healthy communities that reflect the community's needs and supports its health and well-being.

The NPPF September/December 2023 also set out explicit policy requirements pertinent to promoting healthy spaces. Paragraph 92 of the September 2023 NPPF/ Paragraph 96 December 2023 NPPF states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which: 'enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, **access to healthier food**, allotments and layouts that encourage walking and cycling' (Part c).

One of the NPPF's core planning principles (paragraph 93 (b) September 2023 / 97 (b) December 2023) is that plan-making should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.

The PPG on Achieving Healthy and Inclusive Communities states that planning and health need to be considered together. The built and natural environments are major determinants of health and wellbeing. One of the roles of local planning authorities is "to support

opportunities for communities to access a wide range of healthier food production and consumption choices.⁸

In the same paragraph the PPG also sets out that planning policies can have particular regard to “proximity to locations where children and young people congregate such as schools, community centres and playgrounds”.

In the borough, the Joint Local Health and Wellbeing Strategy (as referenced in paragraph 2.41 and 25.2 in the Plan) includes actions to reduce childhood obesity.⁹ Key objectives are further detailed in the borough Public Health Prevention Framework related to the delivery of a whole systems approach of preventing ill health and promoting positive health and wellbeing including in terms of having a healthy food environment.¹⁰

Rising obesity levels are a key issue for the health and wellbeing of children. Excess weight often starts children on the path to health problems that were once considered adult problems including type 2 diabetes, high blood pressure and high cholesterol. Childhood obesity can also lead to poor self-esteem and depression. Obesity is a complex health issue that stems from a variety of causes.¹¹ One key determinant of obesity is our environment. The food available to us in our environment is likely to influence what we and our children eat and subsequently is a contributory factor to our weight. This includes establishments selling energy dense and nutritionally poor foods (commonly referred to as ‘fast food’).¹²

The PPG (Healthy & Safe Communities) states that planning and health needs to be considered together.

The PPG states that planning policies and supplementary planning documents can, where justified, seek to limit the proliferation of particular uses where evidence demonstrates this is appropriate (and where such uses require planning permission). (para 004)

The London Plan topic paper on hot food takeaways¹³ produced in 2018 highlights the prevalence, impact and causes of obesity; and outlines the role of the Mayor of London and local authorities in improving the health of the local population. It therefore forms a key part

⁸ Paragraph: 004 Reference ID:53-004-20190722

⁹ https://www.richmond.gov.uk/media/2brg1wxv/joint_local_health_and_wellbeing_strategy_2024_29.pdf

¹⁰ https://www.richmond.gov.uk/framework_for_prevention

¹¹ The Office for Health Improvement and Disparities (OHID) have produced an ‘[All our Health](#)’ guide to help promote wellbeing and prevent ill health. It details why childhood obesity and excess weight are significant health issues for children.

¹² The [UK Health Security Agency](#) addresses the wider determinants of health to improve health equity and overall health

¹³ [london plan topic paper on hot food takeaways.pdf](#)

of the evidence base to support Policies 19 and 51. London Plan Policy E9 (Section D) Retail, markets and hot food takeaways, sets out that development proposals containing A5 hot food takeaways uses should not be permitted where these are within 400 metres walking distance from entrances and exits of an existing or proposed primary or secondary school. The Panel Report from the examination of the London Plan¹⁴ sets out at paragraph 405 that a “consistent, comprehensive and unambiguous approach proposed in the [London] Plan is more likely to be effective, when applied in conjunction with other initiatives, in helping to tackle obesity and poor health across London” and was overall found sound. The published London Plan already forms part of the development plan for the borough, and parts D and E of Policy E9 do not require a Local Plan to set out policies, they are set out in a form that directly apply to development proposals.

Policy 19 D 2 and Policy 51 is in general conformity with the London Plan in order to help tackle children’s level of obesity in specific areas and schools.

The latest results from the National Child Measurement Programme (NCMP) 2022-23¹⁵ show that 15% of children in Reception (aged 4-5 years) are overweight (including obesity). The equivalent figure for those in Year 6, the last year of primary school, is 23.3%. Whilst it is accepted that the borough’s rates are lower than the national average (21.3% and 36.6% respectively) the significant increase in the percentage of children who are overweight at Year 6, compared with the figure of those starting school (in Reception) is of huge concern.

This trend is echoed in the 3-year combined data series for 2020/21-2022/23. For Richmond borough, 15.8% of children in Reception are over overweight (including obesity) compared to 23.4% in Year 6 (48.1% percentage change). Using the same dataset, whereas 5.3% of children were classed as obese (including severe obesity), this figure is much higher at 12% in Year 6. Essentially, a much larger proportion of children will be considered as overweight or obese when they leave primary school, compared to those starting school.

¹⁴ Report of the Examination in Public of the London Plan 2019 www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/inspectors-report

¹⁵ [National Child Measurement Programme, England, 2022/23 School Year - NHS England Digital](https://www.nhs.uk/health-improvement-and-disparities/national-child-measurement-programme/) The National Child Measurement Programme (NCMP) – overseen by the Office for Health Improvement and Disparities and analysed and reported by NHS Digital – measures the height and weight of children in England annually and provides data on the number of children in reception and year 6 who are underweight, healthy weight, overweight, obese or severely obese.

Table 3: Office for Health and Improvement Disparities: [Public Health Profiles](#)

Indicator	Period	Richmond		Region England			England			
		Recent Trend	Count	Value	Value	Value	Worst/ Lowest	Range		Best/ Highest
Reception prevalence of overweight (including obesity) (4-5 yrs)	2022/23	→	265	15.0%	20.0%	21.3%	29.6%			14.4%
Year 6 prevalence of overweight (including obesity) (10-11 yrs)	2022/23	→	445	23.3%	38.8%	36.6%	47.1%			23.3%
Reception prevalence of obesity (including severe obesity) (4-5 yrs)	2022/23	→	100	5.7%	9.3%	9.2%	14.1%			4.9%
Year 6 prevalence of obesity (including severe obesity) (10-11 yrs)	2022/23	→	230	12.0%	24.8%	22.7%	31.7%			12.0%
Obesity: QOF prevalence (18+ yrs)	2022/23	→	10,767	5.6%	8.8%*	11.4%	3.3%			18.0%
Percentage of adults (aged 18 plus) classified as overweight or obese	2021/22	-	-	56.4%	55.9%	63.8%	76.4%			44.2%
Reception prevalence of obesity (including severe obesity), 3 years data combined	2020/21 - 22/23	-	-	5.3%	10.0%	9.7%	13.6%			5.3%
Reception prevalence of overweight (including obesity), 3 years data combined	2020/21 - 22/23	-	-	15.8%	21.1%	22.1%	28.7%			15.8%
Year 6 prevalence of obesity (including severe obesity), 3 years data combined	2020/21 - 22/23	-	-	12.0%	24.8%	22.5%	31.4%			12.0%
Year 6 prevalence of overweight (including obesity), 3 years data combined	2020/21 - 22/23	-	-	23.4%	39.2%	36.6%	46.3%			23.4%
Obesity in early pregnancy (All ages)	2018/19	-	-	10.9%	17.8%	22.1%	30.5%			6.8%
Percentage of adults (aged 18+) classified as obese	2021/22	-	-	15.0%	19.7%	25.9%	39.4%			11.6%

Source: OHID, using National Child Measurement Programme, NHS England

National NCMP data for 2022/23 highlights that obesity prevalence among children living in the most deprived areas was twice as high compared with those living in the least deprived areas.¹⁶ Those children living in pockets of disadvantage in the borough may be disproportionately affected.

Restricting permission for additional new hot food takeaways around schools will make an important contribution to promoting healthy eating by helping to reduce convenient access to unhealthy foods near schools, support the Healthy Schools London Programme as well as contributing to reducing childhood obesity levels and the creation of healthier environments through the planning policy process.

The mapping of schools and 400 metre buffers was updated in April 2023 and is included as Map 25.1 in the Local Plan. The reference in Policy 19 is to the details set out in Policy 51 of the Plan which is the overarching health and wellbeing policy. No comments were received on the approach to takeaways in the Regulation 19 Consultation responses.

¹⁶ [National Child Measurement Programme, England, 2022/23 School Year - NHS England Digital](#)

Table 4: Proposed Modifications

Details taken from the Schedule of Proposed Modifications suggested by the Council (May 2024) (LBR-002).

Table x

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
SA31.2	n/a	151	Site Allocation 31 Kew Retail Park, Bessant Drive, Kew, Last sentence of 2 nd bullet point under Vision	For clarity, amend: ... Any new convenience retail provision should not exceed the floorspace of the existing units, to protect the existing local centre in Kew There should be no increase in convenience floorspace, to protect the existing local centre in Kew.
P17.1	n/a	241	Paragraph 18.8	Update the supporting text to reference the Retail & Leisure Needs Study – Update Addendum (April 2024) (PSED-02): 18.8 ... The Richmond upon Thames Retail & Leisure Study (Phase 2) 2023 forecasts that up to 2034, there an over-supply of 2,900 sqm gross of retail floorspace, and an undersupply of food/beverage floorspace of approximately 5,400 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,500 sqm gross. <u>An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study, to test whether the forecasts were sound using the latest inputs where appropriate, following in particular the publication of updated national expenditure information. This reveals that the revised forecasts are similar to the Phase 2 Study: up to 2034, an over-supply of approximately 3,000 sqm gross of retail floorspace is forecast, and an under-supply of food/beverage floorspace of approximately 5,500 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,400 sqm gross.</u> Put simply, the need for shopping space is forecast to decrease but the need to provide space for the food & beverage sector and potentially the wider leisure sector is increasing.
P17.2	n/a	241	Paragraph 18.9	Update the figure on borough-wide centre vacancy rate, to reflect publication vacancy rates in the borough’s centres 2023 (Town Centre Land Use Survey) (January 2024) (SD-088): Together with a borough-wide centre vacancy rate of 7.8 <u>8.1</u> % in all frontages (Town Centre Land Use Retail Survey 202 <u>23</u>), the priority...
P17.3	n/a	242	Policy 17 Supporting	To reflect updated National Policy Planning Framework (December 2023):

			our Centres and Promoting Culture (Strategic Policy), Paragraph 18.12	Primary Shopping Areas (PSAs) have been defined, as required by paragraph 86 90 of the NPPF, for the five town centres only.
P18.1	Avison Young with input from Montagu Evans and Energist, St George plc and Marks and Spencer (comment 392)	244	Policy 18 Development in Centres, Part C	Add at C cross-reference at end of first sentence to ensure consistency with Policy 17: 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 A 2. ...
P19.1	Theatres Trust (comment 396)	248	Policy 19 Managing the Impacts of Development on Surroundings, Part A	To widen the application of the policy to uses beyond those with late licenses, bringing the policy more closely in line with London Plan policy D13 and paragraph 187 of the NPPF (September 2023)/ paragraph 193 (December 2023), amend part A2: 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 business 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.

Table 5 Further Proposed Modifications

Change reference	page	Section of the Plan	Proposed Modification
FP.1	252	18.51	For clarity of application. After second sentence insert new sentence: This policy will apply to businesses with a significant proportion of floorspace selling goods which can be found in defined essential shops or provides an essential service. It applies where the existing or last use of the premises was selling essential goods or providing an essential service.
FP.2	13	Local Plan Strategic Vision	To update terminology in Plan. In second paragraph amend first sentence as follows: All of the borough's main town centres have capitalised on how much they are enjoyed by those living in the local area, as well as providing a wider offer attracting visitors.

FP.3	13	Local Plan Strategic Vision	To update terminology in the Plan. In third paragraph amend third sentence as follows: Office space in our main town centres has adapted and local hubs provide space to work,
FP.4	60	Site Allocation 9 Teddington Police Station	To update terminology in the Plan. In section entitled Vision – Amend second bullet point as follows: The site is within Teddington Town Centre but does not form part of the key Primary Shopping Area .
FP.5	58	Site Allocation 9 Teddington Police Station	To update terminology in Plan. In context box, fourth column, amend as follows: Teddington main town centre boundary
FP.6	85	Site Allocation 16 Twickenham Telephone Exchange	To update terminology in Plan. In context box, fourth column, amend as follows: Twickenham main town centre boundary
FP.7	86	Site Allocation 16 Twickenham Telephone Exchange	To update terminology in Plan. In context box, second column, amend as follows: <ul style="list-style-type: none"> • Main Town Centre Boundary Buffer Zone
FP.8	88	Site Allocation 17 Twickenham Riverside and Water Lane/King Street	To update terminology in Plan. In context box, fourth column, amend as follows: Twickenham main town centre boundary
FP.9	89	Site Allocation 17 Twickenham Riverside and Water Lane/King Street	To update terminology in Plan. In context box, second column, make following change: Main Town Centre Boundary Buffer Zone
FP.10	90	Site Allocation 17 Twickenham Riverside and Water Lane/King Street	To update terminology in Plan. Second sentence of second bullet point of Vision: Retail should be maintained at ground-floor in the existing Primary Shopping Area retail frontage of King Street.
FP.11	94	Site Allocation 18 Homebase, Twickenham Road, Hanworth	To update terminology in the Plan. In section entitled Vision - Amend first sentence of third bullet point as follows: As the site is located outside of a town centre and defined Primary Shopping Area and defined retail frontage , the existing retail use is not protected.
FP.12	97	Site Allocation 19 Fulwell Bus Garage	To update terminology in the Plan. In section entitled Vision - Amend first sentence of third bullet point as follows: As The site is located outside of a town centre and defined Primary Shopping Area and defined retail frontage , the existing retail use is not protected.

FP.13	101	Site Allocation 20 Telephone Exchange Ashdale Close, Whitton	To update terminology in Plan. In context box, fourth column, make following change: Whitton main town centre boundary
FP.14	101	Site Allocation 20 Telephone Exchange Ashdale Close, Whitton	To update terminology in Plan. In Vision amend as follows: Second sentence: Appropriate land uses include employment and social infrastructure or other appropriate main town centre uses. Third bullet: <ul style="list-style-type: none"> Any redevelopment proposal should provide for employment and social infrastructure or other appropriate main town centre uses. Fourth bullet: <ul style="list-style-type: none"> Only if other main town centre uses as well as social infrastructure or community uses have been explored
FP.15	126	Site Allocation 25 Richmond Station	To update terminology in Plan. In context box, fourth column, amend as follows: Richmond main town centre boundary
FP.16	174	Site Allocation 37 Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen	To update terminology in Plan. In context box, fourth column, amend as follows: East Sheen main town centre boundary
FP.17	215	Paragraph 17.8	To update terminology in Plan. Amend second sentence as follows: The Council will encourage higher density development in more sustainable locations, such as main town centres and areas better served by public transport, subject to compatibility with established character.
FP.18	240	Paragraph 18.2	To update terminology in Plan. Amend first sentence as follows: The borough's five main town centres comprising steering major development into the five town the principal centre of Richmond and the four centres. Richmond town centre in particular district centres of Twickenham, Teddington, is where the majority of commercial East Sheen and Whitton make up the first tier development is expected to be focused. of the borough's centre hierarchy.
FP.19	410	Appendix 2 Marketing Requirements Paragraph 28.6	Where a proposal involves a change of use away from retail that is not supported by policy within designated and non-designated shopping frontages , marketing must also include the following:

