



**GL Hearn**

Part of Capita Real Estate

# LBRuT Local Plan Examination

**Representations on behalf of  
Evergreen Retail Investment Company**

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**Prepared by**

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DATE  
8<sup>th</sup> September 2017

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### Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

## 1 INTRODUCTION

- 1.1 This statement has been prepared by GL Hearn on behalf of Evergreen Retail Investment Company (hereinafter 'ERIC') in response to the Inspector's questions pursuant to the emerging London Borough of Richmond upon Thames Local Plan (hereinafter 'the Local Plan').
- 1.2 The statement relates to Matter 6 – Economy and Employment; Borough Centres, which is to be discussed at the third Hearing session on 11<sup>th</sup> October 2017.
- 1.3 This statement is in addition to the original representations submitted by GL Hearn, on behalf of ERIC, to the Council's consultation on the Richmond upon Thames Local Plan (Publication Version) dated February 2017.

## 2 MATTER 6 – ECONOMY AND EMPLOYMENT; BOROUGH CENTRES

Does the local plan provide the most appropriate and robust strategy towards the economy and the Borough centres with due regard to cross boarder issues? Is the approach evidenced adequately and consistent with national policy and in general conformity with the London Plan? Will the approach be effective?

Policy LP25 - Borough Centres

**What evidence supports Policy LP25 and how will it be implemented effectively?**

- 2.1 GL Hearn, on behalf of ERIC, support the provisions of Policy LP25 of the Local Plan, in particular we support the identification of Twickenham Town Centre as one of the five ‘main centres’ within the borough. This approach is consistent with the hierarchy of centres within the London Plan, which classifies Twickenham Town Centre as a ‘district centre’. Indeed, the centre hierarchy reflects the role that the centres perform in meeting the retail, cultural, leisure and commercial needs of the borough.
- 2.2 We also support the continued recognition of the role that the five ‘main centres’ will perform in meeting the development needs of the borough, as set out within the Spatial Strategy, with new development to be focused within the five ‘main centres’.
- 2.3 However, it is noted that Policy LP25 does not explicitly identify residential uses as an appropriate town centre use. This is contrary to the provisions of the NPPF which, at paragraph 22 states, *‘In drawing up Local Plans, local planning authorities should:... allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres’*.
- 2.4 In failing to promote residential uses within the borough centres, including Twickenham Town Centre, it is contended that Policy LP25 is contrary to the objectives of the Spatial Strategy and Policy LP34 which seek to focus residential development within the borough centres. It is therefore contended that, in failing to actively promote the delivery of residential uses within the ‘main centres’, Policy LP25 may jeopardise the effective delivery of the policies of the Local Plan.
- 2.5 Furthermore, it is contended that Policy LP25 is not consistent with the objectives of the Twickenham Area Action Plan which supports the delivery of residential development within Twickenham Town Centre (Policy TWP3).

## Policy LP26 – Retail Frontages

### **Does the Plan take an evidence based approach to the identification of key and secondary retail frontages (LP26) which is suitably robust? Are these recognised in the Policies Map?**

- 2.6 GL Hearn, on behalf of ERIC, support the Council's identification of key and secondary retail frontages.

### **Does the Plan take a positive and justified approach towards retail activity in the Borough centres and towards local shops and services? Will LP26(A) prove inflexible in practice?**

- 2.7 GL Hearn, on behalf of ERIC, generally support the Council's approach to retail activity in the Borough centres, in particular the focus on new retail provision within the Borough centres.
- 2.8 However, in its current form part 'A' of Policy LP26 would restrict opportunities for the redevelopment or existing 'key shopping frontages' that would respond to changing retail needs or provide broader regenerative benefits.
- 2.9 Therefore, whilst we support the broad principles of part 'A' of Policy LP26, it is suggested that the policy be amended to allow for greater flexibility in appropriate scenarios (i.e. redevelopment) where the proposals will not have an adverse impact on the health of the Borough centre.