



Quod

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## R22 Local Plan

**Matter 4:  
Employment,  
Retail and  
Other Main  
Town Centre  
Uses**

**Hounslow  
Local Plan**

St James Group Ltd

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DECEMBER 2025

# Matter 4: Employment, Retail and Other Main Town Centre Uses

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- 1.1 On behalf of St James Group Ltd ('St James'), Quod submits this hearing statement in respect of Matter 4: Employment, Retail and Other Main Town Centre Uses. This hearing statement responds to Matters Issues and Questions (MIQs) (IN03) issued by the Inspector on 24<sup>th</sup> November 2025. It is also cognisant of the Inspectors' initial questions (IN01 and IN02) and the Council's response to these under EX8 and EX9.
- 1.2 St James has entered into a partnership with Sainsbury's to bring forward the redevelopment of the Sainsbury's Chiswick store and car park, and are currently in pre-application discussions with the Council.
- 1.3 The Sainsbury's site represents the largest development site within Chiswick, the borough's second largest town centre, and is designated as emerging Site Allocation 107 to deliver a minimum of 300 homes and 5,300sqm of replacement retail floorspace. St James considers that the site has a greater housing capacity and has made submissions that the replacement floorspace is incorrectly reported.
- 1.4 Our client submitted representations at Regulation 18 ('R18') and 19 ('R19') stage and continues to be engaged at Regulation 22 stage (S1) (the 'Plan').
- 1.5 This hearing statement should be read in conjunction with the hearing statements submitted for Matters 1, 2, 3, 6, 7, and 8 the key points of which are summarised below:
- 1.6 The Plan is being prepared at an unprecedented time for London. The Government's<sup>1</sup> clear intention is to make rapid progress toward universal Local Plan coverage because they remain essential to facilitating the effective delivery of housing, jobs and infrastructure. However, to achieve this, the Government expects Inspectors to exercise a degree of flexibility to avoid seeing the adoption of poor-quality plans. We agree that flexibility is required here for the following reasons:
  - 1.6.1 The Plan is being heard against the previous Framework from 2023. It does not consider the Standard Method which proposes to increase housing from London Plan levels of 1,782dpa, to 2,052dpa to address affordability issues. Instead, the Council is proposing to reduce housing delivery over the plan period to an average 1,092dpa from 2030-2041. The Mayor has raised concern with this approach in the Statement of Common Ground between the Council and Mayor of London (EX5e), and we do not consider that this approach is positive.
  - 1.6.2 The Mayor of London and Government<sup>2</sup> are proposing emergency measures now to address '*the housing emergency, a national priority*'. The Government acknowledges

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<sup>1</sup> The Minister of State for Housing and Planning, Matthew Pennycook MP letter to the Planning Inspectorate, 9<sup>th</sup> October 2025

<sup>2</sup> London Plan Guidance Support for Housebuilding and Emergency Housing Package, November 2025

*'That need is particularly acute in London. Housebuilding in the capital has faced significant challenges over recent years – including the impact of the Covid-19 pandemic, high interest rates, spiralling construction costs, regulatory blockers and wider economic conditions. As a result, more than a third of London boroughs recorded zero housebuilding starts in the first quarter of this year. The Government and the Mayor of London are determined to do what it takes to tackle London's housing crisis'.* This emergency is not recognised in the Plan, and the Whole Plan Viability Assessment (EBV1) (2024) is dated in this respect and does not demonstrate viability of the cumulative policies of the Plan, the threshold and promotes individual viability assessments at application stage to overcome this.

- 1.6.3 The borough has seen a sharp decline in its Housing Delivery Test results, dropping close to the 75% threshold. Only 668 homes were started in the borough in 2024/25, and 112 recorded to date (25/26). Once adopted the new London Plan housing figures will apply to the borough *'London has a stretching but realistic housebuilding target of 87,992 homes per year'*. These will supersede the Plan, and the remaining policies of the Plan will need to adapt to these new housing levels otherwise they will be out of date.
- 1.6.4 The Council is promoting the release of greenfield land to meet future development requirements. It proposes to de-designate Green Belt (38ha) and use existing open space for housing, industry and traveller accommodation. We do not consider that the Council has sufficiently optimised its accessible, brownfield town centre sites as part of this strategic decision. For example, throughout the preparation of the Plan, the indicative capacity of Site Allocation 107 (S1A) has been reduced by 20% from 390 to 300 homes with no justification provided within the Site Allocations and Capacity Assessment (EBSC2).

- 1.7 Therefore, crucial to the success of this Plan, is that it is prepared positively in a way that is aspirational but deliverable, contains clearly written and unambiguous policies, and avoids unnecessary duplication of policies (that appear in the Framework and London Plan)<sup>3</sup>. We consider that this can be achieved by the following:-

- 1.7.1 Recognition that there is a housing emergency.
- 1.7.2 Applying flexibility within policies to secure deliverability as the priority of the Plan. Policies which constrain delivery and viability should be revisited or revised.
- 1.7.3 Awarding equal weight to the affordable housing threshold approach and the viability tested route and the level of affordable housing arising from either approach.
- 1.7.4 Recognition that the Whole Plan Viability Assessment (EBV1) upon which policies of the Plan are based (1) does not demonstrate deliverability of the affordable threshold proposed for the majority of sites; (2) excludes abnormal costs which are incurred with the majority of brownfield site development; (3) advocates use of the viability tested

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<sup>3</sup> Framework, paragraph 16

route because of viability concerns; and (4) weight should be applied to viability assessments.

- 1.7.5 Incorporate the wording accepted by the local plan inspectors for Tower Hamlets Local Plan Policy D.SG5 wording to ensure site allocation deliverability *“For site allocations, the policies set out in this plan may be applied flexibly to ensure that the sites are viable and deliverable”*.
- 1.7.6 At 276 pages, it is not clear that this Plan has not duplicated policies throughout. Policy CC2 ‘Urban Design and Architecture’ for example is four pages long, comprising 34 limbs and 11 sub-limbs and refers to four other plans and SPDs. Policy CC3 ‘Tall Buildings’ is three pages long, and has 15 limbs, and 17 sub-limbs. Policy CC4 heritage is four pages, with 31 limbs and 6 sub-limbs. Any major development assessed against these 3 policies alone will need to consider 80 limbs and 34 sub-limbs, 114 policy requirements in total, in addition to the design policies in the London Plan and Framework. This does not suggest compliance with the Framework.

## Executive Summary of Matter 4

- 1.8 The Plan’s incorrect figure of 5,300sqm Class E(a) floorspace at Site Allocation 107 understates the existing retail provision of c.7,100sqm, and risks undermining both development viability and the delivery of Chiswick’s future retail capacity needs.
- 1.9 Policy TC4 should refer to *“main town centre uses”* instead of *“business uses”* in accordance with the Framework definition to avoid narrowing the policy’s scope and creating ambiguity

## Issue 2: Whether the Plan has been positively prepared and whether it is justified, effective, consistent with national policy and in general conformity with the London Plan in ensuring the vitality of the Borough’s town and neighbourhood centres?

**Q2: Are there sufficient allocations/permissions to meet the identified needs set out in the Hounslow Retail Study Update 2024 (EBED2 and EBED2a)? If not, is the approach of the Plan justified and consistent with national policy insofar as it is required to look forward at least ten years ahead, or is there a net requirement still to be identified for each type of main town centre use?**

- 1.10 Hounslow’s Retail Study Update 2024 (EBED2) identifies capacity within Chiswick for an additional 1,000–1,300sqm of net convenience floorspace by 2034, rising to 1,200–1,600sqm by 2043. This equates to demand for one further small/medium convenience store.
- 1.11 The National Planning Policy Framework (‘the Framework’) requires planning policies to, *“allocate a range of suitable sites town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by*

*limited site availability, so town centre boundaries should be kept under review where necessary*.<sup>4</sup>

- 1.12 Chiswick's Major Town Centre comprises three site allocations (105–107) with only Site Allocation 107 (Sainsbury's) identified to accommodate 5,300sqm of Class E(a) floorspace. The identified floorspace relates to the retention and enhancement of the existing Sainsbury's superstore to facilitate its wider redevelopment in a town centre location.
- 1.13 While the 5,300sqm retail floorspace identified for Site Allocation 107 is presented as a '*minimum*' it is incorrect factually and contradicts the 'Site Requirement' to "*retain and enhance E(a) floorspace*" and the Council's evidence base.
- 1.14 This existing floorspace figure was confirmed in Sainsbury's Regulation 19 representation and aligns with the Council's own evidence base (EBED2a), which identifies the Essex Place superstore as having a gross floor area of 6,931sqm.
- 1.15 In discussions with the Council, we have identified that the proposed retail figure (including store, back of house, plant and concessions) is c.7,500sqm.
- 1.16 The current figure of 5,300sqm is therefore unjustified and currently undermines development viability of Chiswick Town Centre.
- 1.17 The Local Plan must therefore be updated to reflect the correct floorspace figure of c.7,500sqm for Site Allocation 107.
- 1.18 Delivery of Site Allocation 107 is contingent on any redevelopment of the existing Sainsbury's store and car park being capable of providing a modern supermarket that improves customer experience and trading performance. If this cannot be achieved, the site will not come forward for comprehensive redevelopment.

**Q7: Is Policy TC4 positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan, insofar as seeking to manage town centre uses? Responses should address:**

**f) Whether the terminology is justified and consistent with national policy when referring to 'business use' or should it alternatively refer to 'main town centre uses'?**

- 1.19 For clarity and consistency with both national and London Plan policy, all references to "*business use*" within Policy TC4 should be replaced with "*main town centre uses*" definition as set out in the Framework:

*"Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres,*

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<sup>4</sup> NPPF Paragraph 90

*indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).<sup>5</sup>*

- 1.20 Continued maintenance of “*business use*” risks creating ambiguity to which uses are supported in town centres and could unintentionally narrow the scope of the policy. This is particularly pertinent following the 2020 amendments to the Use Class Order with former town centre appropriate business-type use under Class A2 (Financial and Professional Services) now sitting under the umbrella of Class E.
- 1.21 This change is also necessary for general conformity with the London Plan (2021), which uses the term “*town centre uses*” throughout Policies SD6 and SD7 to guide the management and growth of London’s town centre network.
- 1.22 Reference to “*business uses*” within the LP2021 is framed in relation to Use Classes B1c, B2 and B8. These uses are generally not appropriate within town centre environments.

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<sup>5</sup> Annex 2 of NPPF