



Hounslow Local Plan Examination

Response to Matter 4 - Employment, Retail and Other Main Town Centre Uses

Representations on behalf of Sainsbury's Supermarkets Ltd (SSL)

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

Independent Examination of the Hounslow Local Plan - Inspectors Matters, Issues and Questions (MIQs) for Examination

Introduction

1. On behalf of our client, Sainsbury's Supermarkets Ltd (SSL), we welcome the opportunity to respond to Matter 4 of the Inspectors MIQs relating to the current independent examination of the Hounslow Local Plan.
2. SSL has been involved in the London Borough of Hounslow (LBH) Local Plan Review process since 2016. In December 2023, SSL submitted representations to the Regulation 18 consultation on the emerging Hounslow Local Plan following the Council's decision to combine several draft Volumes into a single consolidated document, within which their store in Chiswick town centre (the site) has been allocated for redevelopment to provide a mixed-use residential development including a reprovided foodstore. Most recently SSL submitted representations to the Regulation 19 consultation on the consolidated Hounslow Local Plan in October 2024.
3. SSL's store in Chiswick is located within the designated town centre and provides an important opportunity to deliver a town centre mixed-use redevelopment, providing new homes, new retail space and contributing to the revitalisation of Chiswick High Road.
4. We do not propose repeating the points made within previous representations, but recommend that the Inspector reviews our representations which specifically deal with the proposed allocation of SSL's Chiswick store. The following response to the Inspectors MIQs is made within the context of the preceding representations and does not supersede these, but rather emphasises and adds to the important factors that the Council and Inspector should consider to find the new Local Plan sound.

Matter 4 - 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?

5. Broadly, SSL consider that the Plan has been positively prepared and consistent with national policy and the London Plan with regards to the strategic objectives outlined by Policy TC2, aimed at ensuring vitality of town centres through promotion of regeneration. However, to ensure the objectives of Policy TC2 are achieved, the Plan needs to ensure flexibility is provided to appropriate levels of car parking to serve town centres. Policy TC2 Part G refers to 'ensuring' that adequate levels of car and cycle parking is maintained in each town centre, but this commitment is not carried through to allocations for the mixed-used redevelopment in town centres. Despite narrative around moves to online shopping, physical in-store sales still account for over 90% of revenue for SSL and the car is an important mode of transport for customers, particularly those with accessibility requirements, to be able to do their shopping. This is discussed further in the response to Question 2 below.
6. A lack of car parking provision will only prevent people visiting the high street and town centres, and push people to out-of-centre stores or to shop online.
7. To be sound, the Plan must reflect the commitment set out in Policy TC2 Part G and ensure that

adequate car parking is provided in town centres and town centre allocations.

8. In addition, Policy CC2 requires shopfronts and signage to make a positive contribution to the existing and future townscape, having regard to the Character, Sustainability and Design Code SPD. Policy CC5, which addresses advertisements is too complex and detailed and does not recognise the needs of businesses. The draft Plan needs to allow for flexibility in signage types and design that fits the needs of the business and that is proportionate to the scale of store and its context. In SSL's experience, LPAs are unnecessarily stringent on considering Sainsbury's advertisements. Sainsbury's orange signage, which is synonymous to their brand and name, can be unpopular for no good planning reason.
9. Policy CC5 is overly long, complex and overly restrictive. It is not succinct or positively prepared, and conflicts with paragraph 141 of the Framework, which states that controls of advertisements should be operated in a way which is simple, efficient and effective.
10. Policy CC5 should be shortened and simplified to reflect the paragraph 141 Framework that confirms that advertisements should be subject to control: "Only in the interests of amenity and public safety, taking account of cumulative impacts."

Q1) Has the Plan approach been informed by adequate and proportionate evidence in relation to Hounslow's town and neighbourhood centres?

c) Whether the evidence is relevant, up-to-date and takes appropriate account of market signals, including having regard to the range of main town centre uses included in Class E of the Use Classes Order?

11. The Hounslow Retail Study Update 2024 states that there is a general trend towards online shopping and growing non-store shopping. Whilst we do not disagree, in SSLs case over 90% of transactions still take place in-store and the online shopping is either collated or collected within stores anyway. Therefore, the importance of ensuring sufficient allocation of bricks and mortar space within the Plan should remain.
12. The Retail Study does highlight increasing vacancy levels and store closures on high streets and in town centres, and whilst the growth in online shopping is referenced as a cause, competition from online is not the only cause. The costs and bureaucracy of operating bricks and mortar retail businesses make having physical premises unattractive and needs to be addressed.
13. More generally, the growth in online opportunities to shop and dine, the introduction of Class E and the evolution of retailing and dining habits since the Covid pandemic means it is necessary to move away from the 'traditional' approach and methodology for assessing the role and function of town centres and the impact of out of centre retail and food and beverage development.
14. Shopping and eating habits have changed rapidly in recent years and are continuing to develop. The increase in online ordering and the use of apps to purchase goods and food means that an online retailer or a dark kitchen operating from a warehouse (a Class B8 Use) could have a significantly greater impact on a town centre than a bricks and mortar retailer outside a town centre, but the online retailer or a dark kitchen will not have to address the tests for main town centre uses that are set out in policy.
15. What historically was seen as competition between town centre and out-of-centre retailing has now been largely replaced by a choice as to whether goods are purchased online or physically by visiting a bricks and mortar retailer ('bricks' vs 'clicks'). Indeed, the picture is further complicated by the fact that some shoppers treat stores as showrooms. They will visit stores to physically see and touch an item, but then purchase it online and have it delivered. Other shoppers will purchase an item online but pick it up in a store.
16. In short, the way people undertake shopping (and dining) is much more complex than was historically the case. Now, the concern should be differentiating between online and bricks and mortar retailers. If someone orders groceries, goods or food online, and it is delivered to their home, it makes very little difference whether the outlet it is delivered from is inside or outside a town

centre. As is often the case, the planning system has not kept up with socio-economic and technical changes. Retail planning policy at every level reflects historic views and concerns that are becoming more outdated as technology and shopping and eating habits evolve. Policy needs to reflect today's circumstances and challenges.

17. A consequence of these changes is that the flexibility of Class E uses should be promoted as well as space for 'traditional' town centre uses in town centre to ensure ongoing occupation and activation of town centre sites.
18. The Plan as drafted is overly prescriptive and dismissive of non-traditional town centre uses in designated town centres, but should be as flexible as possible so that decision-making is responsive to market trends and avoids extended periods of vacancy. The NPPF (2024) provides a helpful definition of 'main town centre' uses:

"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, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)."

19. The Plan should be cognisant of this definition alongside Class E uses to ensure flexibility in the approach to decision-making for town centre spaces. Precluding a suite of appropriate uses will only lead to increased vacancy of town centre properties and undermine the ongoing viability and vitality.

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?

20. In broad terms, the draft Plan includes sufficient allocations to meet retail needs, and SSL support the dual approach of housing delivery and improving the economy via regeneration of town centres. There must be an equal focus on providing job opportunities as well as new housing. The new Hounslow Local Plan must support all forms of economic development which creates jobs, such as retailing. SSL would support changes to remove overly prescriptive policies which in practice can act as a deterrent to investment and job creation.
21. Sainsbury's Chiswick store has been allocated for the retail space of 5,300sqm (Site allocation 107). While SSL support the inclusion of retail floorspace within the allocation, the existing store is a significant provider of jobs within the Borough and is a vital contributor to local economic growth which SSL are keen to protect. As such, the allocation should confirm that no less retail floorspace than existing should be provided. The Regulation 19 representations highlighted that the existing store comprises 6,931sqm gross floorspace. Early feasibility discussions of the allocation development has indicated a retail floorspace of approximately 7,500 sqm (including store, back of house, plant and concessions). This should be reflected in the allocation wording. The draft allocation wording undermines the viability of the Chiswick Town Centre by proposing a reduction in retail floorspace.
22. Part of the need to protect jobs is also ensuring the continuity of trade for the store whilst redevelopment of the allocated site is ongoing. Stores such as Sainsbury's provide a considerable number of jobs, which should be given the same level of protection as any other employment type uses such as office or industrial.
23. The current London Plan seeks to ensure that if business, commercial or industrial floorspace is lost as a result of redevelopment, an equivalent amount of business, commercial or industrial floorspace is re-provided in the proposal which is appropriate in terms of type, use and size, incorporating existing businesses where possible. This is because it is recognised that the provision of business, commercial or industrial floorspace is essential to protecting employment opportunities for Londoners.

24. Local Plan Policy ED2 seeks to protect jobs in Class Eg i-iii, B2, B8 and similar employment uses outside SILs and LSIS. Hounslow Plan Policy ED2 Part D) states that the Council will retain the amount of land available for employment uses on existing employment sites.
25. In contrast, the GLA and LBH and other LPAs are not concerned about the loss of jobs in retailing through redevelopment. There is no policy protection for jobs in retailing, despite nearly 400k people in London working in the retail sector. Sainsbury's employs 34,605 colleagues in London.
26. Therefore, to be found sound:
 - any allocation for redevelopment of retail sites should seek to protect jobs by requiring existing retail floorspace to be re-provided with equivalent trading space and with a plan for continuity of trade to ensure operations are unaffected and employment of colleagues at stores are protected.
 - Also, jobs in retail and hospitality should be valued as much as jobs in 'traditional' employment in Classes Eg i-iii, B2 and B8.
27. Furthermore, allocations for redevelopment of retail stores must ensure that appropriate levels of parking are provided, as set out in Policy TC2. For the Sainsbury's Chiswick site (Site allocation 107), the quantum of allocated parking has been removed altogether and the minimum parking quantum of 7,600sqm referenced in previous iterations of the emerging Local Plan is no longer included. Retail allocations must make it clear that an appropriate provision of parking to serve the retail function will be permitted, otherwise the vitality of the store will suffer threatening viability of the whole development proposed as part of any allocation.
28. The importance providing adequate parking at Sainsbury's stores for customers should be recognised and flexibility allowed on the application of standards incorporated to allow for parking to be considered on a case-by-case basis.
29. The Chiswick store contributes to the Chiswick town centre economy, with over 45,000 physical transactions occurring each week in store (excluding online transactions). Physical transactions equate to 91.5% of the store's trade. If shoppers are not provided with adequate parking, they will simply drive to stores elsewhere that do provide parking. Invariably, these will be out-of-centre. This will result in significant trade diversion from Sainsbury's in-centre store to out-of-centre stores. The Chiswick store also provides parking to support linked trips and is the key anchor for the town centre. The potential diversion of trade from Sainsbury's to stores elsewhere and the removal of car parking to support linked trips will undermine Chiswick's vitality and viability. This is contrary to Objective 1 of the Plan, which is to support town centres.
30. For these reasons, for SSL to agree to the redevelopment of one of their large stores to deliver housing, adequate parking (and servicing) must be provided with a new foodstore.

Q3) Is the Plan sufficiently clear, including when taking Policies P1, P1(a), P1(b), P1(c), P2, P2(a), P2(b), P2(c) and Policies TC1, TC2, TC3, TC4 and TC5 together, as to the overall amount of each type of main town centre use and the locations being planned for during the Plan period? Would the approach of the relevant policies be effective for the purposes of decision making on future development proposals?

31. The draft Plan Policies TC1-TC5 are not clear on the overall amount of town centre use and locations being planned for. As referenced above, the policies need to ensure that existing retail floorspace is re-provided with equivalent trading space and with a plan for continuity of trade to ensure operations are unaffected and jobs provided by retail stores are protected.
32. Reference to floorspaces are made within specific allocations, however as demonstrated above, the Sainsbury's Chiswick allocation (Site allocation 107) does not include commensurate retail floorspace to the existing store and therefore jeopardises the viability of the allocated development. The quantum of retail provision should be reviewed and set out clearly in the Plan policies to ensure they do not undermine existing uses.

33. More generally, for the reasons set out above, the Policies must address the technological and lifestyle changes that are happening which undermine the function and role of traditional town centres.

Q4) Would Policy TC1 be effective, justified, consistent with national policy and in general conformity with the London Plan in all other respects, including with regard to where sustainable growth will be supported?

34. Policy TC1 establishes the network and hierarchy of centres in the Borough. This is generally in conformity with London Plan objectives and broadly effective in clarifying where major centres are. Policy TC1 states that it will seek to support development and initiatives that promote the Borough's town centres and enable them to grow and evolve in line with LBH's regeneration objectives. We would reiterate that to ensure the policy is as effective as possible and consistent with national policy, as stated previously within this Statement, as much flexibility as possible must be embedded into the draft Plan's policy framework. The nature and needs of town centres are changing and, as such, to achieve the objectives of Policy TC1, the flexibility afforded by Class E should be fully utilised without precluding specific uses that do not traditionally fall within a 'town centre' use, provided it is generally appropriate to its surrounding context and character.
35. As well as supporting Class E uses within town centres, the main town centre uses identified in the NPPF (2024) should also be acceptable.

Q5) Would Policy TC2 be effective, justified, consistent with national policy and in general conformity with the London Plan in all other respects, including the objective of retaining existing levels of retail floorspace in Feltham Town Centre (noting the range of main town centre uses that fall within Use Class E) and in terms of how an assessment would be made in terms of a development proposals contribution to the vitality and viability of the Borough's town centres?

36. Policy TC2 Part D references sustaining the quality of shopping provision in Chiswick Town Centre, highlighting that LBH will seek to maintain the centre's diverse roles in terms of shopping, the evening economy and business activity. The Policy's effectiveness in consolidating the town centre vitality of Chiswick (and indeed town centres throughout the borough) would be improved by ensuring a flexible an approach to Class E uses and main town centre uses as set out in the NPPF to ensure ongoing viability and vitality.
37. Furthermore, undermining the role and function of the Sainsbury's store by reducing its size and car parking provision through its redevelopment, and/or preventing continuity of trade during the construction period, will have a negative impact on the vitality and viability of Chiswick town centre.

Q6) Is the approach of Policy TC3 in seeking to manage the growth of retail and other main town centre uses; positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan? Responses should address the following:

b) Whether there is sufficient evidence to support the proposed locally set floorspace threshold of 500 sq.m of retail, above which an impact assessment would be required for development proposals?

38. Policy TC3 requires impact assessments for development of over 500sqm retail floorspace. Sainsbury's 'Local' format stores are no greater than 280sqm (net) so they can trade all-day on Sundays. A 280sqm net store is usually over 500sgm gross so we have extensive experience of providing retail impact assessments for stores of this scale. The reality is that these small format stores serve a local catchment area and provide an important facility for local communities. They allow local people to undertake their food shopping on foot. Their limited turnover and their function mean that they cannot have a significant adverse impact on the vitality or viability of town centres, which is the policy test. Preparing a retail impact assessment for stores of this scale is disproportionate and causes delays and increases cost.

39. There is little evidence to support the threshold being set at 500sqm. The retail evidence base (Retail & Town Centre Needs Study - 2024 Update, Doc ref: EBED2) simply states that 500sqm was thought to be acceptable in the 2018 Retail Study so it is appropriate now. The evidence base should explore how many impact assessments have been prepared for stores of 500sqm, and whether an impact objection has ever been sustained to see if the threshold is justified.
40. We recommend that the threshold should be increased to 1,000sqm (gross), or changed to start with stores of 500sqm (net) so that it does not catch small convenience stores of 280sqm (net) that serve a local catchment area and allow local people to walk to undertake top-up food shopping.