

Hounslow Local Plan (2020-2041)

Examination

Stage 1 Hearings Note

Retail and Main Town Centre Uses Note

March 2026



**London Borough
of Hounslow**

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1.0 Introduction

1.1. This Retail and Main Town Centre uses Note responds to requests from the Inspectors during the Matter 4 (Employment, Retail and Other Main Town Centre Uses – including proposed releases of the Green Belt / Metropolitan Open Lane) 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?) hearing session of the Stage 1 Hounslow Local Plan 2020-2041 **(S1)**¹ hearings, held in Week 2 of Stage 1 on Tuesday 27th January 2026. The details of the tasks undertaken in this section of the Note are set out in Documents Requested by Inspectors in Hearings Week 2 Update February 2026 **(EX41)**² as follows:

- Clarification of the approach in the Plan to retail and main town centre uses, including:
 - o The justification for not setting out a specific requirement for town centre and main town centre uses in the Plan.
 - o Clarification of the extent to which site allocations in the Plan address the qualitative and accessibility gaps in retail and main town centre provision, and the extent to which those in edge of centre and out of centre, could not be otherwise addressed in Hounslow’s town centres.
 - o Clarification of and justification for the intended status of neighbourhood centres in the context of national policy - are they equivalent to district centres or local centres, or are they small parades of shops of purely neighbourhood significance?
 - o Revisit the consistency of the evidence with the minimum development quantum identified for retail and main town centre uses in proposed site allocations in the Plan (Site 107 - Sainsburys, Chiswick was identified specifically in discussions).
 - o Justification for the impact assessment threshold for retail in Policy TC3 Part C.

¹ [Hounslow Local Plan 2020-2041 Proposed Submission Version](#)

² [Documents Requested by Inspectors in Hearings Week 2](#)

- Clarification of how the intention in the Plan to retain/sustain a high proportion of existing levels of retail floorspace would be achieved given that most main town centre uses fall within Use Class E (i.e. the role and scope of any existing Article 4 directions, and any intended use of conditions as part of planning decisions in the context of national policy and guidance).
- Explanation of any relevant proposed modifications to Policies TC1 to TC5 and relevant supporting text, arising from hearing discussions and the tasks listed above (NB. proposed modifications requested during Weeks 1 and 2 of the Stage 1 Hearings to be compiled in an update to Document S11 (pending document 7 requested during Week 1) by 20/03/26).

1.2. The Council sets out in this Note a response to each of the above requests from the Inspectors. At the end of each section, the Council has included a Table showing proposed Modifications if it is considered that they are needed in answering the question. As well as those modifications relevant to this Note, there are further Modifications made in light of the discussions at the examination hearings shown in document **S11**.

2.0 The justification for not setting out a specific requirement for retail and main town centre uses in the Plan.

2.1. The Council's decision to not set a specific requirement for net additional retail or other main town centre floorspace in the Local Plan (**S1**) is both justified and consistent with national policy. The approach is sound and is evidenced by various documents, including:

- Hounslow Retail Study Update 2024 – Volume 1 – Main Report (**EBED2**)³;
- Hounslow Retail Study Update 2024 – Volume 2 – Appendices (**EBED2a**)⁴;
- LBH Evidence to support Consideration of Article 4 Directions: Town and Neighbourhood Centres and Employment Designations (2022) (**EBED4**)⁵;
- Hounslow Retail and Town Centre Needs Study Update (2018) (**EX32**)⁶;

³ [Hounslow Retail Study Update 2024 – Volume 1 – Main Report](#)

⁴ [Hounslow Retail Study Update 2024 - Volume 2 - Appendices](#)

⁵ [LBH Evidence to Support Consideration of Article 4 Directions: Town and Neighbourhood Centres and Employment Designations \(2022\)](#)

⁶ [Hounslow Retail and Town Centre Needs Study Update \(2018\)](#)

- Hounslow Retail and Town Centre Needs Study Update Appendices (2018) **(EX32a)**⁷

2.2. The Retail Study Update 2024 **(EBED2)** assessed retail capacity to 2034, which represents 10 years from the base year of the study, and the minimum timeframe identified by the NPPF **(ORD3)**⁸ when allocating sites; and then assessed retail capacity to 2043, which represents a year beyond the end of the Plan period. The assessment showed that there isn't any significant further need for either convenience or comparison floorspace within the borough for the duration of the Plan period, beyond what is allocated. Notwithstanding these evidenced conclusions, the Council recognises the need to support town centres, and as such, policies within the Plan are premised on steering new retail and main town centre uses to the borough's established existing town centres. It does this by using tools that collectively ensure that town centre uses are directed to appropriate locations so that centres remain vibrant and viable. This includes signposting applicants to the retail policy tests that need to be met for town centre use proposals outside of town centres, including the sequential test and retail impact assessment. The Local Plan also sets out a town centre network, which follows a hierarchical approach set out in the London Plan **(ADP1)**⁹. This gives clarity on what development is acceptable in the borough's centres, provides greater certainty to developers and protects town centres.

2.3. As well as placing emphasis on vitality, viability and design quality the policies also reflect the fact that town centres are undergoing change due to, iter alia, shifts in retail behaviour, online shopping and mixed use development patterns. As such, the town centre policies, in accordance with national guidance and particularly paragraph 90 (a) of the NPPF **(ORD3)**, encourage a flexible and diverse approach to town centre uses which, alongside other policies, allows for centres to evolve and be flexible if needed, rather than implement fixed land-use quotas.

2.4 There are other London boroughs that also have taken the option to not set quotas and specific requirements for retail and main town centre uses in their local plans, including the recently adopted local plans of the London Borough of Waltham Forest and London Borough of Barnet, which are also outer London boroughs.

3. Clarification of the extent to which site allocations in the Plan address the qualitative and accessibility gaps in retail and main town centre provision, and the extent to which

⁷ [Hounslow Retail and Town Centre Needs Study Update Appendices \(2018\)](#)

⁸ [National Planning Policy Framework 2023](#)

⁹ [London Plan \(2021\)](#)

those in edge of centre and out of centre, could not be otherwise addressed in Hounslow's town centres.

3.1 The Hounslow Retail and Town Centre Needs Study Update 2018 **(EX32)** and the Hounslow Retail and Town Centre Needs Study Update 2018 Appendices **(EX32a)** explored retail needs over the period to 2033 and reviewed the performance of the town centres in the borough. This included assessing the need for commercial, leisure and other town centre uses and conducting health checks on the function and vitality and viability of the four town centres.

3.2 This was done by setting out the existing retail and leisure provision and shopping patterns for the borough as well as providing an assessment of quantitative need for further convenience and comparison goods floorspace in the borough over the assessment period and a qualitative assessment/overview of the vitality and viability of each of the four town centres within the borough.

3.3 This study found that there was no qualitative need in Hounslow, Chiswick and Brentford Town Centre for comparison, convenience, leisure, financial or business or other main town centre users. In Feltham, it did however identify a qualitative need for greater provision of leisure floorspace.

3.4 Given this assessment was undertaken in 2018, it is accepted that it is somewhat dated and predates the Covid pandemic and other factors that have changed and impacted national retail/leisure trends. As such, the Council commissioned a Town Centre Health Check study in 2022 **(EBED4)** and a further Retail Needs Study Update in 2024 **(EBED2) (EBED2a)**.

3.5 The 2024 Update endorsed the findings from the 2018 Study which concluded that there was not a qualitative need for additional convenience goods floorspace in any of the boroughs four town centres, stating that the *"conclusion still remains applicable"* and that the identified capacity for convenience goods floor space is so small that it is not necessary to *"identify sites in the Local Plan for new small/medium sized convenience stores in the town centres."*

3.6 In terms of comparison goods floorspace, it is noted that the 2024 Study did state that, in qualitative terms, Chiswick *"could benefit from an increase in the comparison goods provision to offer a greater variety of retailers"* and that Feltham *"could benefit from improving its comparison offering"*. Whereas these conclusions only focus on the qualitative need, the 2024 Study also identified that there wasn't any quantitative need in Feltham or Chiswick for comparison goods floor space. Nevertheless, The Council have allocated sites in Feltham with Retail as a specified land use. These include

- Site Allocation 63: 80-86 High Street Feltham (1520sq m)

- Site Allocation 69: Land at 2 High Street Feltham - 630 sqm retail

- Site Allocation 72: St. Catherine's House and Car Park - 130sqm retail

3.7. For Chiswick, with the exception of the Sainsbury's site, which is allocated for 57,084sq ft retail, due to (1) the character of the town centre; (2) there being no identified comparison goods need for Chiswick; (3) the evidence that the town centre is generally performing well being both vital and viable; and (4) the general national comparison goods market trends and declining retailer requirements, no sites have been specifically allocated for comparison goods floorspace in Chiswick town centre

3.8 Furthermore, the policies in the Town Centre Chapter allow for the diversity of uses, especially at ground floor level, and if market forces were to change over the plan period and dictate that additional comparison or convenience goods offerings were needed in any of the town centres, then the Local Plan (**S1**), through these policies, provides Policy allowance for this to be supported.

3.9 In Feltham, Leisure West is being allocated as a site offering leisure space via Site Allocation 65 – Leisure West (**S1a**)¹⁰. The allocation is an existing leisure and retail park with uses that include a cinema, 10 pin bowling, gym and dining. It also has a large car park and provides ample scope for future intensification if market forces dictate. There are no other opportunities in Feltham Town Centre for a leisure allocation of this large size as the use on the site is already established and because town centre allocations are performing other functions. Whereas an edge of centre rather than a town centre site, the NPPF (**ORD3**) states, at Paragraph 90 (e) that *“where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.”* The requirements of the site allocation (**S1a**) are specific in that the site should be redeveloped *“for leisure use”* and *“should protect and enhance the attractiveness and viability of leisure uses on the site”* whilst it also states that the scheme should *“focus on increasing legibility and walkability to and from Feltham High Street and Station”* with *“New walking and cycling routes... to connect Feltham Town Centre”*. It is considered that the redevelopment of this site on the edge of Feltham Town Centre will enhance the town centre through improved walking and

¹⁰ [Hounslow Local Plan 2020-2041 Proposed Submission Version: Chapter 12 - Site Allocations](#)

cycling routes and will also meet the shortfall in leisure floorspace identified in Feltham over the Plan period.

3.10 In terms of accessibility gaps, some allocations outside of town centres - primarily within the Great West Corridor (GWC) - include an element of retail and main town centre use provision.

3.11 The number of residents, jobs, and employment floorspace within the GWC are expected to significantly increase over the plan period. Both the Local Plan (**S1**) and GWC Masterplan Revision (**EBCC4**)¹¹, prepared in the context of the area's designation as an Opportunity Area in the London Plan (**ADP1**), sets out a strategy for accommodating this growth through new employment and residential development. Alongside this growth, there is a corresponding need to plan for additional ancillary facilities for both new residents and the workforce for new employment development to ensure high quality placemaking, including around transport nodes such as the proposed new station at Lionel Road on the West London Orbital (WLO) line. The Local Plan (**S1**) enables certain main town centre uses outside existing town centre boundaries by setting policy criteria through the Spatial Strategy and TC1(e) alongside Site Allocations (**S1a**), that allow such development in specific circumstances.

3.12. These uses are not intended to create new centres or impact the viability and vitality of existing centres, rather, they are being allocated to ensure that areas that are to experience considerable growth are sustainable and well served. It is acknowledged that such allocations are not located within designated town centres, however they provide essential small scale supporting functions for localities that will support growth. The purpose of these allocations is to complement, rather than compete with, nearby established centres and to contribute to the creation of successful, attractive, and liveable neighbourhoods.

3.13. The Council would be amenable to a modification to the supporting text of TC1, to help clarify the Council's approach to retail and main town centre uses in broad terms along with an explanation as to why certain allocations not in town or edge of centres have an element of retail or main town centre uses within them. The Council suggests the following wording in the table below to be incorporated into the Supporting Text of TC1. This proposed modification will also be shown in document **S11**.

¹¹[LBH Great West Corridor Masterplan - Revision \(2020\)](#)

Modification code	Policy Map/ Figure	Paragraph/ Clause	Page No.	Modification	Reason for modification
EIP_C3_02	TC1	Supporting Text	72	<p><u>Retail and Main Town Centre Uses outside Centres</u></p> <p><u>There are a limited number of proposed allocations outside of town and neighbourhood centres which include an element of main town centre use provision, including retail. The main town centre use aspect of these allocations is designed to be ancillary and, in many instances, has been included on the premise that it will primarily support the needs of those residents and employees associated with those allocations. In this respect, the requirement of some retail and main town centre uses outside of any town or neighbourhood centre, predominantly in the Great West Corridor, is required for design and place making purposes to ensure that allocations are sustainable. Through the policies in this chapter and the wider Local Plan, the Council will seek to direct development involving main town centre and retail uses to the borough's established town and neighbourhood centres, except where specific allocations state otherwise or where other stipulations, such as those relevant to the sequential approach, are met.</u></p>	To give additional clarity and context on the Council's position to the location of main town centre uses in the Supporting Text
EIP_C3_01	TC1	E	69	Support sustainable growth through being appropriately located, <u>either in accordance with the Site Allocations</u> , or in areas with existing or planned high public transport accessibility levels, where residential and	As per discussions at the EIP hearing session, it was requested that the Council clarified the

Modification code	Policy Map/ Figure	Paragraph/ Clause	Page No.	Modification	Reason for modification
				residential-led mixed use schemes are proposed and ensuring uses respond to the opportunities and challenges in an area	meaning of 'appropriately' in this instance.

4. Clarification of and justification for the intended status of neighbourhood centres in the context of national policy - are they equivalent to district centres or local centres, or are they small parades of shops of purely neighbourhood significance?

4.1 Town Centres within the Glossary of the NPPF (**ORD3**) are defined as *“Town centre: Area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.”*

4.2 As per the Supporting Text of Policy TC1, *“Along with the aforementioned town centres, the borough also has a number of both large and small neighbourhood centres. These can vary substantially in size and character and provide services to meet key day-to-day needs. They are particularly important for residents who do not have access to a car, and enhance the sustainability of residential environments.*

Large neighbourhood centres contain a range of at least 5 retail units that serve day-to-day shopping needs and will also contain other uses such as banks, doctors’ or dental surgeries. These centres are sometimes around a focal point, such as a tube station in Hounslow West, the war memorial in Heston and Isleworth or the Public Hall in Old Isleworth. There are also 36 small neighbourhood centres in the borough, which are listed in the appendices. These more

generally form a row or parade of at least 4 or 5 units which serve the key day-to-day needs of local residents."

4.3 In accordance with national policy it is those centres listed as 'large neighbourhood centres' within the plan that are equivalised with the meaning of local centres in the NPPF (**ORD3**) whilst small Neighbourhood Centres are parades of shops. It is accepted that a modification is needed for clarification, and as such the supporting text of TC1 will be modified. This proposed Modification is shown in the table below.

Modification code	Policy Map/ Figure	Paragraph/ Clause	Page No.	Modification	Reason for modification
EIP_C3_03	TC1	Supporting Facts	72	Large neighbourhood centres contain a range of at least 5 retail units that serve day-to-day shopping needs and will also contain other uses such as banks, doctors' or dental surgeries and share the definition of local centres in the NPPF . These centres are sometimes around a focal point, such as a tube station in Hounslow West, the war memorial in Heston and Isleworth or the Public Hall in Old Isleworth.	To aid in clarifying the definition of small and large neighbourhoods.

5. Revisit the consistency of the evidence with the minimum development quantum identified for retail and main town centre uses in proposed site allocations in the Plan (Site 107 - Sainsburys, Chiswick was identified specifically in discussions).

5.1. The Sainsburys Chiswick site (Site Allocation 107) (**S1a**) is an allocation which is impacted by a number of sensitive constraints. While the Council considers redevelopment of the site achievable, to include both retail and residential elements, it will need careful consideration at application stage. Whereas the Council appreciate the findings of the Retail Needs Study Update 2024 (**EBED2**) in specific regards to the site, the minimum development quantum of retail floor space allocated in the Site Allocation (57,084sq ft) is reflective of that which was provided to the Council as part of the intended uses in the Call for Site form submitted for Sainsbury's Chiswick (50,000 sq ft).

5.2 The Council has, through the capacity calculation and assessment, optimised the capacity of residential use on the site, and this is reflected in the site allocation quantum. This calculation uses a design led approach to optimise the density of residential uses in this highly accessible town centre location, whilst maintaining a successful retail store. As such, the capacity calculation has taken into account all relevant planning constraints, including potential impacts on nearby heritage assets, impacts on wider townscape effects, and the appropriate building heights that could reasonably be utilised on the site. The resulting capacity minimises potential harm to heritage assets and addresses other site-specific constraints through appropriate building heights. Any increase in floor area to the retail element of this allocation would therefore have a knock on effect on the development quantum for the residential element of the allocation and vice versa. The Council therefore considers that despite the evidence suggesting that the store is performing well, the development quantum in the Site Allocation represent the optimal capacity for an allocation both housing and retail on the site. Given the importance of conserving nearby heritage assets, any increase in one land-use component would necessitate a corresponding reduction in the other.

5.3 As well as the optimisation of the site's capacity, which is informed by the site's physical characteristics and surrounding constraints, the allocation of retail on the site has also been informed by the need for such uses in the borough. The Council's evidence, specifically the Retail Needs Study 2024 (**EBED2**), which takes into account both the emerging allocations and the over trading of the store through Table 2 in Appendix B (**EBED2a**), suggests that the need for additional convenience goods floor space is so small that it is not necessary to allocate additional convenience floor space.

5.4. Notwithstanding the optimisation and constraint factors involved in determining the development quantum for the site, it is stressed that the quantum is minimum and the Council has a demonstrable record of applying them flexibly at application stage should it be appropriate given all other planning considerations.

5.5. The Council does not consider there are inconsistencies in any other proposed site allocations in regard to their minimum development quantum for retail and main town centre uses. There has been no further correspondence, either through the examination hearing sessions or hearing statements that would suggest as such. Retail provision within site allocations was also not raised as a key issue in either the Local Plan Regulation 18 or Regulation 19 consultations.

6. Justification for the impact assessment threshold for retail in Policy TC3 Part C.

6.1 The NPPF (**ORD3**) (paragraph 90) allows local planning authorities to set a local gross floorspace threshold for when an impact assessment will be required. In the absence of a local threshold the NPPF sets a default threshold of 2,500sqm of gross floorspace. Policy TC3 c) sets a threshold of more than 500sqm retail or 2,500sqm of other town centre uses. This figure reflects the current threshold that is applied in the existing Local Plan (also Policy TC3 (c)) and is applicable to any development outside the four town centres.

6.2 In preparing the Plan, the Council reviewed the effectiveness of the locally set threshold through the Hounslow Retail and Town Centre Needs Study Update (2018) (**EX32**) and subsequently, the Hounslow Retail Study Update 2024 – Volume 1 – Main Report (**EBED2**). The 2018 Study recommended, having regard to, inter alia:

- the health of the town centres;
- performance of the town centres;
- retail unit and floorspace composition of each of the town centres;
- increasing competition from the internet; and availability of units in the prime shopping area capable of meeting potential national multiple occupiers in each of the centres

that the threshold of 500sq m for retail floorspace proposed outside of designated centres was appropriate. The 2024 Study, agreed with those findings and stated that *“an amendment to the threshold within Policy TC3 is not necessary”* as *“The threshold will continue to provide the Council with sufficient flexibility to assess the merits and potential impact implications of edge and out-of-centre retail applications.”*

6.3. It is important to stress that whilst the locally set threshold would require the submission of an impact assessment for all edge-of-centre and out-of-centre developments exceeding the thresholds, national guidance states that the impact test should be undertaken in a proportionate and locally appropriate way, commensurate to the scale of development proposed. The level of detail would typically be agreed with planning officers during the pre-application process in order to avoid overly onerous requirements that may otherwise restrict and delay development opportunities from coming forward.

6.4. The Council considers that carrying this approach and threshold forward in the Local Plan (**S1**) is therefore justified. It is also consistent with other recently adopted Local Plans within

London, including those of LB Barnet and LB Brent and higher than that of the adopted Local Plan of LB Havering.

6.5. Notwithstanding the above, the Council believes that further clarity could be given in the Supporting Text of Policy TC3 which outlines why the Council has taken the approach of applying a 500sqm threshold. This is outlined in the Table on the overleaf.

Modification code	Policy Map/ Figure	Paragraph/ Clause	Page No.	Modification	Reason for modification
EIP_C3_06	TC3	Supporting Text 4.0	76	<p><u>We are taking this approach because</u></p> <p><u>4.0</u></p> <p><u>4.1 It is important to stress that whilst the locally set threshold requires the submission of an impact assessment for all edge-of-centre and out-of-centre developments exceeding the thresholds, national guidance states that the impact test should be undertaken in a proportionate and locally appropriate way, commensurate to the scale of development proposed. The level of detail would typically be agreed with planning officers during the pre-application process.</u></p>	To give commentary and clarity as to why the Council has adopted a locally set threshold and give developers some certainty that the scope of this could be applied somewhat flexibly and agreed with planning officers at pre app stage.

7. Clarification of how the intention in the Plan to retain/sustain a high proportion of existing levels of retail floorspace would be achieved given that most main town centre uses fall within Use Class E (i.e. the role and scope of any existing Article 4 directions, and any intended use of conditions as part of planning decisions in the context of national policy and guidance).

7.1, The Council acknowledges that Class E is a wide ranging use class that encompasses varied activities and uses. However, policies can still have a significant role to play in managing the mix of uses and promoting and encouraging retail uses in town centres. This is especially the case when supplemented by the use of planning conditions, S106 agreements and Article 4 Directions. Reflecting this, the Hounslow Local Plan proposes to

- Define Primary Shopping Areas (PSAs) with a target proportion of retail frontage (through the policy map).
- Require active ground floor frontages in town centres (through Policy TC4).
- Apply guidance that recommends design and shopfront standards that favour retail type uses.
- Use site allocations to secure retail-led redevelopment (through specific allocations).
- Encourage public realm improvements and regeneration of the town centres (through specific allocations).

7.2. These policy tools and site allocations, taken either alone or together, will all contribute to the regeneration and place making of the borough's town centres and primary shopping areas. They will assist in driving growth whilst increasing footfall in town centres and, in turn, helping to make retail proposals more attractive for developers.

7.3. As well as these proactive controls within the Local Plan, the Council also intends to use other measures and tools to assist in safeguarding retail use. This includes through the implementation of planning conditions at application stage to help shape the physical characteristics of units so that they remain attractive and viable for retail. Whereas each application will be assessed against its own merits on a case by case basis, planning conditions might include active frontage requirements, minimum unit sizes and/or hours of operation or delivery/servicing arrangements. Conditions can also manage the use of developments so that they are retained within a particular use class or a sub-use within Class E and can discourage

the change to a use other than retail. It may also be that conditions are paired with S106 agreements to further strengthen requirements in specific circumstances.

7.4. The Borough also has an Article 4 Direction (**EX34**)¹² in place which covers change of use or development that would result in a new dwelling. This was made in April 2024 and implemented from April 2025. It removes permitted development rights for change of Class E to residential use within defined town centres and neighbourhood centres. It allows the Council to manage the borough's stock of Class E uses in town and neighbourhood centres so that these centres continue to function according to their role in the town centre hierarchy and so that their vitality and viability is protected. This existing Article 4 Direction will continue to play an important role in helping the Council to effectively enforce any unauthorised change of use from Class E to residential in centres over the Plan period.

7.5. It is the intention of the Council to utilise the above tools to ensure that the stock of retail and main town centre uses are maintained in a manner that will appropriately retain the function of these centres to reflect their role in the Town Centre Hierarchy, in accordance with national policy and the London Plan (**ADP1**). The town centre policies, more broadly however, are also receptive to the fact that town centres are changing and must remain flexible to the possibility that retail habits could change further and the need for retail and Class E floorspace more generally, may also therefore alter. As such, TC4 is flexible in its wording through Clause E and G to uses other than retail being acceptable at ground floor level in town centres.

7.6 The Council would be amenable to a modification, as shown in the Table below to Clause G to help with clarity.

Modification code	Policy Map/ Figure	Paragraph/ Clause	Page No.	Modification	Reason for modification
EIP_C3_09	TC4	G	78	Retain retail or business-use main town centre uses at ground floor level	For greater clarity and consistency

¹² [LB Hounslow Article 4 Directions: A4D.3 Change of use or development that would result in new dwellings](#)

