Evidence Report to Support Consideration of Article 4 Directions: Town and Neighbourhood Centres and Employment Designations

On behalf of **LB Hounslow**

London Borough of Hounslow

Project Ref: 332010722| Rev: 2 | Date: October 2022

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Document Control Sheet

Project Name: Hounslow Article 4 Direction

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Report Title: Evidence Report to Support Consideration of Article 4 Directions: Town and Neighbourhood Centres and Employment Designations

Date: October 2022

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Revision	Date	Description	Prepared	Reviewed	Approved
1	July	LBH Review	SS	TS	RP
2	October	Final	SS	RP	RP

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1 Introduction

1.1.1 Stantec UK Ltd. ("Stantec") is instructed by the London Borough of Hounslow ("Hounslow") to prepare a report providing an evidence base to support the consideration as to whether Article 4 Directions (A4Ds) in Hounslow's town centres, neighbourhood centres and employment areas are appropriate.

1.1.2 The advice on Article 4 Directions relates to removing permitted development rights (PDR) from Class E uses to residential (Class MA PD Rights) in certain selected parts of the borough where such a direction would be justified to avoid wholly adverse impacts on the centres.

1.1.3 Part 2 of this paper provides a detailed view of the various rights. But in summary, planning control has generally looked to control the loss of retail, offices and light industrial because each use provides an economic benefit. So, in the past, planning permission was needed before considering whether sites (or buildings) can be uses for an alternative purpose with residential the most likely alternative use.

1.1.4 But Government has been looking to relax this control – allow buildings to move between the uses simply in line with market demand. The first generation of 'permitted development' allowed the conversion of offices to homes – on the national ground/logic that offices were oversupplied and this was 'squandering' residential development. This was controversial because some Boroughs lost a significant share of their stock to permitted development, including occupied stock. But, in general, Councils were able to use A4Ds to limit these losses or at least bring them back into planning control.

1.1.5 Government has since revised this Right – on one hand limiting its scope by introducing a threshold to protect larger buildings but then widening its scope to include retail, office and light industrial uses. So the new rights not only allow for the loss of (smaller) office units but also retail and light industrial uses. This was partly the product of a change to the Use Class order which brought these uses into a new E class.

1.1.6 The report sets out the policy and legislative context and presents the finding of an audit of facilities undertaken in April 2022. The audit of facilities is undertaken through site visits to the following areas:

- The 'main town centres' within Table TC1.1 of the Local Plan (Hounslow, Chiswick, Brentford and Feltham)**;**
- The 'large neighbourhood centres' within Table TC1.1 of the Local Plan (West, Bedfont, Hanworth, Heston, Cranford, Isleworth and Old Isleworth); and
- The 36 'small neighbourhood centres' within Appendix 5 of the Local Plan**.**

1.1.7 The audit of facilities assesses each centre against the following indicators:

- Diversity of uses;
- Proportion of vacant street level property; and
- Pedestrian flows.

1.1.8 The diversity of uses are split into the following categories:

- **Convenience**: uses such as supermarkets, convenience food stores, bakers, butchers, greengrocers, fishmongers and off-licences.
- **Comparison**: uses such as clothing, furniture, books, electrical, DIY, gifts, cars, chemists, department stores, florists, sports, jewellers, pet stores and charity shops.

- **Services**: uses such as restaurants, cafes, fast food, hairdressers, health & beauty, dry cleaners, travel agents, banks & financial services and estate agents.
- **Miscellaneous**: main town centre uses not falling into the above categories.
- **Vacant**: units that are not currently occupied.

1.1.9 It should be noted that we compare the proportion of vacant units within each of the larger centres with the national average of 13.9%. The national average has increased over the last couple of years due to the pandemic. The COVID-19 pandemic has had a significant economic and social impact on London's town centres and high streets. The GLA and London Councils have recognised this, making high streets the focal point for recovery planning, supporting the use of Article 4 Directions to remove the new Class E to residential PDR to aid recovery efforts and help maintain London's vibrant town centres and high streets.

1.1.10 Nonetheless, vacancy rates in London's town centres and high streets are typically well below those experienced in other parts of the country. Despite changes in consumer behaviour, technology and competition from out-of-centre development, they have shown their resilience by adapting and re-inventing themselves. They have diversified over time towards leisure uses and experiential, service retail uses[1]. It is shown below that this is generally the case with Hounslow's centres.

1.1.11 While this report focuses on the retail areas, and the High Streets specifically, the Boroughs economic evidence (the Employment Land Review – updated in 2020) confirms that the borough's stock of employment property, including that now within the E use class, is also in short supply. This is particularly acute for light industrial property, loss of which should generally be resisted – in line with previous advice Stantec have provided the Council. In the context of this work and possible Article 4 Directions, the major risk to the Borough is that residential hinders the effective operation of the Borough's industrial estates. Much of the Borough's stock, especially in the west of the Borough, is located on large estates that operate 24 hours a day, being connected with Heathrow and the logistics market. Here the introduction of any (unplanned) residential could limit the operational flexibility of these sites and partially the large portfolio of SIL Land.

1.1.12 Related to this, the introduction of small scale (unplanned) residential into large SIL sites can limit the scope for industrial intensification. The London plan relies on intensification to meet the industrial needs of London. In this Borough the Council proposes releasing Green Belt land to meet industrial needs but, looking forwards, further releases can be minimised if more efficient use of the existing sites can be made. In line with the London Plan the Council should actively be facilitating and encouraging intensive redevelopment – an objective that could be hindered if the integrity of the SIL sites are disrupted. Intensification is likely to require land parcels to be reconfigured and plot densities (inc. heights) dramatically increased and so nearby residential is a clear hindrance to this policy aspiration.

[1] Strategic evidence to support London borough Article 4 Directions (commercial to residential) (July 2021)

2 Legislation and Employment Policy

2.1.1 In this section we summarise the policy and legislation background to A4Ds; starting with the Use Class Order before moving on to discuss permitted development.

Legislation

Use Class Order

2.1.2 The Use Class Order (UCO) is long standing and groups property into broad classes and then limits changes of use between them. There are also long standing 'waivers' (Permitted Development) which allows for development (including change of use) without seeking planning permission. In recent years Government has amended both the Use Class Order and also Permitted Development Rights (PDRs) to increase 'flexibility' in the market and to boost the supply of housing.

2.1.3 Property was previously attributed to a class broadly responding to its use, e.g. industrial, warehousing, offices, retail, housing, leisure etc., with planning permission generally needed to move between these uses. This allowed the Councils to control the 'balance' of their stock. As part of the planning process the Council could, for example, consider the 'need' for space being lost and prevent the loss when policy and evidence supported this.

2.1.4 On 1 September 2020, the Government revised the UCO including the merging of Use Classes A1, A2, A3, B1, B2, D1 and D2 into Use Class E 'commercial, business and service'.

2.1.5 This now means that effectively buildings can change uses within the same use class without requiring planning permission including office previously Use Class B1a, and light industrial previously Use Class B1c, to any of the uses classes detailed above, or the reverse.

2.1.6 Use Classes B2 (general industrial) and B8 (storage and distribution) remain unaffected by the amendments to the UCO; certain uses are still specifically excluded and become Sui Generis, which continues to include some employment uses such as scrap yards and car showrooms. The NPPF and PPG also remain unchanged and planning authorities are still required to understand and plan for their business needs regardless of the UCO amendments.

2.1.7 Nonetheless, the new amendments to the UCO are likely to have some impact on the supply of office and light industrial space given the flexibility now given to change between uses within Use Class E.

General Permitted Development Order (GPDO)

2.1.8 Property has always benefited from some form of permitted development including flexibility to change the use of smaller property without seeking planning approval. This principle was undermined with the introduction of office to residential rights in 2013 which resulted in an 'unplanned' loss of stock that was (partly) brought under control via a first generation of A4Ds. But since then major changes to the UCO have taken place.

2.1.9 In 2020, major changes were made to the General Permitted Development Order including the introduction of Class ZA which allows for limited demolition and rebuild of property including the demolition of individual buildings (freestanding) and rebuild. So for example an office building could be redeveloped for a similar building but this time for housing. This is limited to older property (pre 1990) and is subject to prior approval from the local planning authority in relation to certain matters including transport & highways and the impact on business and new residential of the development introduction or increase in residential use in the area. No consideration with regards the loss of employment space is required when considering prior approval.

2.1.10 An additional change made to the GPDO was the introduction of Class AA which allows for the construction of up to two new storeys of flats in the airspace above detached buildings in commercial or mixed use, including where there is an element of residential use. This is unlikely to have as much an impact on employment land as Class ZA.

2.1.11 In addition to the above, the Government announced in April 2021 that they would introduce a new permitted development right, known as Class MA, to allow the newly introduced Use Class E ('Commercial, business and service uses), which includes office and light industrial to convert to residential use. The permitted development right was introduced on 1 August 2021 and applies to buildings which have been vacant for at least three continuous months prior to submission of the prior approval. This builds on the flexibility created by the introduction of the new Use Class E in September 2020.

2.1.12 There are some limitations and a prior approval process but these generally provide only basic protection including addressing possible noise and transport / parking issues and minimum light requirements. Also where the site is in a conservation area the impact on the area can be considered.

2.1.13 An important change is a new cumulative maximum limit of 1,500 sqm of floorspace per building applied to Class MA changes of use to residential. 1,500 sqm is however still significant and, if in office use, could employ 150 people[2].

2.1.14 Although limited to 1,500 sqm per building this Class MA right is perhaps the most concerning because of clear parallels with previous office to residential PDR changes and the speed at which space can be lost. We discuss the 'risks' associated with this policy choice in the next section.

Article 4 Directions

2.1.15 Councils are able to withdraw permitted development rights by issuing Article 4 directions. These cannot influence the Use Class Order but can limit the Permitted Rights by, for example, removing the Use Class MA right to move Use Class E property into housing - in a similar way to the previous office to residential A4Ds. But, as noted in the introduction Government expects these directions to be limited.

2.1.16 The Secretary of State's Written Ministerial Statement on revitalising high streets and town centres (July 2021) places emphasis on local authorities making A4Ds only in very special circumstances when justified by robust evidence that shows "*that the permitted development right would have wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre)".*

2.1.17 On a localised level this could be "*limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area"*, and again be based on robust evidence, and apply to the smallest geographical area possible.

2.1.18 An A4D direction does not generally provide immediate protection and there is a risk property owners may act in advance of any direction coming into force. So there is an effective time lag before the A4D offers protection.

Policy

2.1.19 Above we have summarised changes to legislation. These have almost exclusively looked to introduce 'flexibility' into the planning system. But in summary this flexibility has the objective of boosting the supply of housing by removing Councils ability to control the stock of property

[2] In theory the building should be vacant but in practice owners can manage tenants out and this provides little or no protection.

in the area. If it is financially attractive to a property owner to change the use of their property national policy removes the planning barriers to stop this. This is a blunt tool by design.

2.1.20 But as we set out below there is a need for Councils to be concerned about the ‘balance’ of stock. These concerns are not ‘blunt’ but often designed to secure ‘good growth’ and manage the need to protect and preserve stock for some uses because they cannot compete with higher value uses.

2.1.21 As we set out below the recently published London Plan recognises the need to protect town centres, industrial areas and other parts of London from unplanned developed. This policy thrust does not always align with the increased flexibility at the national level.

Regional Planning Policy

2.1.22 A new London Plan was published in March 2021 to guide development throughout London up to 2041. The London Plan is guided by the Good Growth policies, with policy GG5 of the London Plan seeking to conserve and enhance London’s global economic competitiveness and ensure that economic success is shared amongst all Londoners. Those involved in planning and development are expected to plan for sufficient employment space in the right locations to support economic development and regeneration.

2.1.23 Policy E1 of the London Plan states that increases in the current stock of offices should be supported in locations such as town centre office locations, existing urban business parks, and locally-orientated town centre office provision to meet local needs. The policy goes on to state that existing viable office floorspace capacity in locations outside the areas above, should be retained, supported by Article 4 Directions to remove permitted development rights where appropriate, facilitating the redevelopment, renewal and re-provision of office space where viable and releasing surplus office capacity to other uses.

2.1.24 Policy E2 of the London Plan expects boroughs to include policies in local development plan documents that support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size. Development of B Use Class business uses should ensure that the space is fit for purpose having regard to the type and use of the space. This policy is intended to operate in those parts of London where there is evidence in a Local Development Plan Document of particular shortages of business space available for occupation, including lower-cost space. It supports the life-cycle of prime, secondary and tertiary business space over the longer term by securing the re-provision of capacity at open market rents and the provision of affordable workspace at rents maintained below the market rate where appropriate as set out in Policy E3 Affordable workspace. It will be most effective in those parts of London where boroughs have removed office or light industrial to residential permitted development rights through Article 4 Directions.

2.1.25 Policy E4 Land for industry, logistics and services to support London’s economic function supports Boroughs in introducing Article 4 Directions where appropriate to ensure that the need to retain sufficient industrial and logistics capacity is not undermined by permitted development rights

2.1.26 Policy E8 supports the evolution of London’s diverse employment sectors ensuring the availability of suitable workspaces including:

1) start-up, incubation and accelerator space for micro, small and mediums-sized enterprises

2) flexible workspace such as co-working space and serviced offices

3) conventional space for expanding businesses to grow or move on

4) laboratory space and theatre, television and film studio capacity

5) affordable workspace in defined circumstances

2.1.27 The policy supports the promotion of clusters such as Tech City and MedCity, and the development of new clusters where opportunities exist, such as CleanTech innovation clusters, Creative Enterprise Zones, film, fashion and design clusters, and green enterprise districts.

2.1.28 Boroughs across London contain a rich variety of employment areas, including industrial estates, high streets and areas within and on the edge of town centres, which provide locations and opportunities for locally significant sectors and clusters of businesses. These are important for local economies and provide diverse employment opportunities for local residents. Boroughs are encouraged to identify these sectors and clusters and set out policies in Local Plans that support their growth, having regard in particular to public transport provision and ensuring the vitality and viability of town centres.

2.1.29 Policy E9 supports Development Plans identifying areas for consolidation of retail space where this is surplus to requirements, while supporting convenience retail and preventing loss in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel. The London Plan acknowledges retailing is undergoing restructuring in response to recent trends and future forecasts for consumer expenditure, population growth, technological advances and changes in consumer behaviour, with increasing proportions of spending made via the internet.

2.1.30 In preparing or reviewing Development Plans, boroughs should plan proactively to manage the transition of surplus retail (including high street frontages, purpose-built shopping centres, malls and retail parks) to other uses in line with this policy and Policy SD6 Town centres and high streets, Policy SD8 Town centre network, Policy SD7 Town centres: development principles and Development Plan Documents, while ensuring sufficient capacity for convenience retail to meet the day-to-day needs of local residents. Some retail and related uses, when clustered, can support town centres to develop niche or specialist roles and may provide important visitor attractions. Over-concentrations of some uses however, such as betting shops, pawnbrokers, pay-day loan stores, amusement centres and hot food takeaways, can give rise to particular concerns regarding the impact on mental and physical health and wellbeing, amenity, vitality, viability and diversity. The proliferation and concentration of these uses should be carefully managed through Development Plans and planning decisions.

2.1.31 Policy SD9 secures a broader mix of store sizes and formats and a variety of town centre uses including retail, leisure, employment and social infrastructure, subject to demand, capacity and impact. Regular town centre health checks should be undertaken to inform strategic and local policy and implementation, whereby Boroughs should introduce targeted Article 4 Directions where appropriate and justified to remove permitted development rights for office, light industrial and retail to residential in order to sustain town centre vitality and viability and to maintain flexibility for more comprehensive approaches to town centre housing and mixed-use intensification. When considering office to residential Article 4 Directions in town centres, boroughs are encouraged to take into account guidelines in Annex 1 and Policy E1 Offices as well as local circumstances. Due to the restructuring of the retail sector and other changes in the wider economy. A strategy should be developed for town centres that are experiencing significant change.

2.1.32 Policy HC5 Supporting London’s culture and creative industries supports the continued growth of creative industries, where Development Plans should protect the existing cultural offer and creative industries. Boroughs are encouraged to work with the Mayor and relevant stakeholders to identify Creative Enterprise Zones in Local Plans in areas that have emerging or existing clusters of creative industries.

Summary

2.1.33 National policy and legislation has increasingly looked to boost the supply of housing, and at the national level has tipped the planning scales to favour housing over other economic uses (within the new E class). Councils have been stripped of their ability to determine planning applications where the development falls within one of the new classes of permitted development. But at the same time polices and plans emphasize the important role that the quantum and quality of commercial space provides.

2.1.34 Local policy also provides a context for town centres and employment land, which outlines the borough's objective to promote the town centre network and to boost local economic development. Relevant policies to the consideration of an A4D include the following policies in the Hounslow Local Plan 2015-30:

a. Policy TC1, which seeks to maintain a network of successful town and neighbourhood centres, each with their own role and function, to provide the shops, services and facilities needed to meet the needs of the borough's population;

b. Policy TC2, which seeks to support the vitality and viability of centre, and promote them as places that provide a diverse retail, service, business, cultural and leisure offer;

c. Policy TC4, which seeks to maintain and enhance the fundamental retail role of town centres, which ensuring that they are responsive to changing needs and provide scope for a diversity of uses, in appropriate places, that contribute to their vitality and viability;

d. Policy TC5, which seeks to maintain and improve neighbourhood centres to meet the key day-to-day shopping and service needs of local communities, and to protect the retail and community functions of neighbourhood centres to meet the key day-to-day needs of local residents;

e. Policy ED1, which seeks to promote economic growth and development including by ensuring that sufficient capacity is provided for anticipated sectors of employment growth; and

f. Policy ED2, which seeks to maintain the borough's employment land supply, including by protecting designated employment land and setting particular tests where loss of employment land is proposed.

2.1.35 As with previous rounds of policy change the Council is able to limit developers scope to act without planning permission by introducing A4Ds. This does not prevent development but triggers a planning application and allows the Council to consider the application – including how it contributes to the various polices we have outlined above.

3 Why may an A4D be justified?

3.1.1 There is no doubt that the UK has a shortage of housing, resulting in acute affordability issues, especially in London. So, any policy mechanism that can help address this housing supply issue carries considerable benefits that need to be offset against any risks. In London, the policy choice is especially stark; with a London Plan that struggles to meet housing need and little or no new land. If more homes can be accommodated on brownfield sites every effort needs to be made to explore this.

3.1.2 So in this section we look at some of the risks that recent changes could introduce. Identifying these risks here helps with our site/area analysis in the next section.

Lessons from previous rounds of PDR

3.1.3 This is not the first generation of permitted development rights and as noted above Offices have been submitted to residential permitted development rights before (since 2013).

3.1.4 What we understand from previous rounds of office losses include:

- In the right circumstances the loss of space can be rapid, and unexpected[3];
- The loss of space is indiscriminate – with high quality and modern office space, being lost regardless of its economic potential.
- Conversely; low cost or 'value' space can be lost making it harder for local businesses to grow
- The loss can harm the integrity, or critical mass, of estates – making the remaining office stock less attractive over time.
- Where offices are mixed with industrial the introduction of new residential undermines the integrity of the estate and limits the scope for industrial activity.

3.1.5 For most Councils, the speed that PDR could strip stock from an area and the indiscriminate lack of control encouraged 'old style' A4D directions. Councils saw good quality, lettable, property being lost via PDR irrespective of its economic value. This was often while local policy, and the London Plan, were encouraging new employment and retail space.

3.1.6 It is the case that Covid will have changed the previous status quo and demand for office space is weaker. But the 'lesson' for future A4Ds is that PDR is indiscriminate and losses can be rapid.

What other disbenefits could new PDR losses bring?

3.1.7 Previously only offices could be lost via PDR but the scope has now been widened via new the E use class. Most obviously to include retail. So the risks / threats now extend outside of offices.

3.1.8 Setting the speed of losses aside there are a number of other risks that may emerge – and particularly now PDR includes retail property and so includes the risk that the Boroughs high street economy could be lost / harmed.

3.1.9 Hounslow, along with other Boroughs are looking to the retail network to help make living in the borough more sustainable – maintaining a network of retail and also service sector

[3] LB Richmond lost around quarter of their office stock before they were able to limit their losses via office to residential A4Ds.

function within walking distance of residentials but also looking; post covid, to how space can be reconfirmed to meet modern needs. Including a network of 'walk to work' flexible office markets to act as a homeworking alternative. 15 Minute neighbourhoods and a post covid flexible office market are still 'work in progress' but clearly any policy led attempt to reinforce and strengthen this network could be unpicked if owners can simply use PDR to achieve higher values even if this removed economically advantageous to retain (or rescope) stock)

Critical mass of activity

3.1.10 Uncontrolled PDR losses run the risk of a loss of critical mass. The retail economy has traditionally benefited from clustering and the term 'comparison' shopping reflects the fact that shoppers have historically liked choice on their high streets. Internet retailing has dented this market but it has not dissipated. In some areas, for example Hounslow Town Centre, the mixed retail/leisure/food offer is what makes the centre attractive. Other centres also thrive on their mixed offer – although this offer flexes to reflect local needs. Chiswick High Street is very different to Hounslow West for example, with a different retailer profile, but both centres fulfil their basic function of meeting local needs.

The risk of 'gaps' in the high street frontage could undermine the retail experience

3.1.11 Related to critical mass but a specific geography point is the risk of 'gaps' emerging in the high street frontage. Councils have long sought to protect their 'frontages' and many retail policies still look to protect their frontages. This is because gaps in activity harm the health of the high street, undermining the focus of critical mass and resulting in a more disjointed shopping experience. The 'experience' is becoming ever more important because it clearly differentiates the traditional retail experience from internet retailing. Furthermore, there has been policy pressure to 'activate' high streets.

3.1.12 Dwellings, in the middle of a parade of town centre E class uses, cannot add to this experience and will result in 'dead' space and gaps in the offer. This is only likely to be relevant to ground floors but the harm – if it becomes widespread, could be significant. We know from the Richmond experience that whole clusters of economic activity, small offices in their case, can be quickly extinguished.

PDR risks the SME retail economy with would appear to be strong in Hounslow

3.1.13 The current round of A4Ds disproportionally risks harming the small SME retail sector which is strong in Hounslow. Hounslow is not a strong chain store destination and the major centres have very limited major chain store presences. The retail network here would appear to be more dependent on smaller retails. The small threshold in the current PDR rights protects larger buildings (although not from subdivision) but does not protect the majority of the Boroughs E class stock in the high streets because these are mostly smaller units.

3.1.14 The Borough's centres are infrequently anchored by major brands – in this area the major retailers are often found in out of centre retail parks (e.g. Kew Bridge) or in major metropolitan centres outside the borough (e.g. Ealing). This appears to have helped with Covid resilience but means the future of the centres is more heavily reliant on the smaller and more flexible units that could be at risk of PDR losses.

PDR could undermine the London Plans industrial intensification policy – further increasing the need for future releases of Greenbelt land

3.1.15 The introduction of residential use can be particularly harmful to traditional employment uses. The long established approach in the London Plan is to allocate land for 'Strategic Industrial Use' with criteria, that in summary seek to protect the site from operational limitations caused by conflicting uses. The capitals stock of industrial property is often compromised because, in London homes and jobs have long co-existed. So where this separation of uses is possible policy has strongly protected this, with Inspectors in London continuing to support this SIL policy.

3.1.16 The GLA, in their strategic evidence to support A4Ds, raise the risk that PDR homes, on Strategic Industrial Locations (SIL), undermines the very purpose of this designation. We note that there are now some limited controls to limit prior approval where there is a conflict with neighbouring industrial uses. But the purpose of SILs is wider than protecting the interests of firms today – but securing that flexibility looking forward. SIL sites are irreplaceable when lost and so need special policy protection.

3.1.17 Related to this is the risk that uncontrolled residential can undermine the London's Plans whole approach to (trying) to meet economic needs. The London Plan relies on 'intensification' of industrial uses, which all evidence suggests requires large and 'uncomplicated sites'. The bulk of intensive units (multi-floor) coupled with the intensive traffic generation (with air/noise) impacts makes them very hard units to locate. The GLA encourages master planning large areas so that the opportunities can be identified and any existing constraints worked around in a holistic way. This may include re-scoping the whole SIL – as is the case in the GWC area where the plan is taking a compressive, plan-led approach. Obviously, one or two 'nail' homes, instances where landowners are reluctant to progress masterplans in the area, could hinder intensification.

Higher value residential areas may be more at risk

3.1.18 There is evidence that losses of aspects of E use class from PDR can quickly erode the stock (as was the case in Richmond) when the market is right. While commercial rents tend to be higher in the main centres the uplift in residential value is still significant and provide a quick return on investment. We set out average rents and values in the next section.

3.2 In summary

3.2.1 The benefits of PDR are clear and directly related to the boost in housing. This a national priority.

3.2.2 There are however clear disbenefits. Some are clear from previous rounds of Permitted Development and the new 1,500sqm threshold is helpful in limiting large losses but does not protect the majority of units in the Borough nor the risk of partial conversion. New MA rights, with UCO E extend the 'risk' to a wider range of uses and most notably the retail stock.

4 Audit of Facilities

4.1 Introduction

4.1.1 The audit of facilities in the town centres is based on an Experian Goad plan for each centre, which represent the majority of main town centre uses within each town centre. For the large neighbourhood centres and small neighbourhood centres, the audit of facilities is based on the boundaries shown within the Hounslow Policies Map (2015).

4.1.2 Generally speaking, we have found that retail vacancy rates are low and the Borough high streets are well occupied with a mix of national brands appropriate to the scale of the relevant centre. What is noticeable is the large number of independent stores that fill the void or gap between major brands in the main Borough centres. Coupled with low vacancy rates this suggests that the retail stock remains in demand.

4.1.3 The same applies to employment space with almost no vacancy in space that can be used for light industrial space although surplus office space, especially post-covid emergency. The Borough has very limited formal office stock in the town centres, although has a large number of small high street units that provide services in E class property.

4.1.4 For the four main town centres, the outcome of the audit is broadly consistent with the results from the health checks in the Council's Retail and Town Centre Needs Study (Update, September 2018) (this previous study did not cover neighbourhood centres). The study overall found generally good (or 'adequate' in the case of Brentford) levels of vitality and viability, and overall a low or declining rate of vacant units.

4.2 Town Centres

4.2.1 Commercial rents vary from centre to centre; with centres having lower average commercial rents generally attracting cheaper variety stores, the proliferation of which may show signs of retail distress on high streets. Lower commercial rents in turn could prompt landlords to explore options to use PDR to convert to residential for higher residential yields, placing thriving local centres at risk and creating a disproportionate equalities impact on locals to access essential services in walkable distances from where they live. Too much erosion of commercial and community services via PDR in town centres and high streets could also create dormitory areas where residents must travel further afield to get to shops and places of work, undermining efforts to support walking and cycling and sustainability of local centres.

4.2.2 Table 4.1 shows the average commercial rents achieved in the core shopping areas within each of the defined 'main town centres' and 'large neighbourhood centres' in Hounslow Borough. Chiswick (£1,309 per sq.m), Hounslow (£748 per sq.m) and Feltham (£418 per sq.m) currently achieve the highest commercial rents, being the only three centres above the average commercial rent for Hounslow (£413 per sq.m). In contrast, Cranford (£160 per sq.m), Heston (£220 per sq.m) and Isleworth (£228 per sq.m) currently achieve the lowest commercial rents.

4.2.3 The data shows that, generally, commercial rents follow house prices. Some of the lowest commercial rents align with lower house values. Chiswick has the highest values for both commercial and residential.

4.2.4 Whether to convert a property or not will be highly specific to the property in question and care should be taken with any average prices. A flat on Chiswick High Road with limited (no parking) and possible noise/amenity issues may not be 'average'. But the data does suggest that on average house prices are high(ish) and commercial rents low in some of the smaller centres in the East of the Borough (Brentford and Isleworth). This may mean they are more vulnerable to losses. We know from experience that the value gap in Richmond (extreme high residential values but average commercial) drove their losses / conversions in the past.

Table 4.1 – Average Commercial Rents for Centres compared with residential property prices

Centre	Average Commercial Rent (£ per sq.m)	Average Property (flat, house) Price (July 2022)[4]
Hounslow	748	£451,095
Chiswick	1,309	£752,100
Brentford	252	£518,915
Feltham	418	£373,176
Hounslow West	300	£451,095
Bedfont	246	£332,492
Hanworth	294	£407,495
Heston	220	£377,525
Cranford	160	£338,846
Isleworth	228	£474,920
Old Isleworth	367	£551,250
Average	**413**	**£457,174**

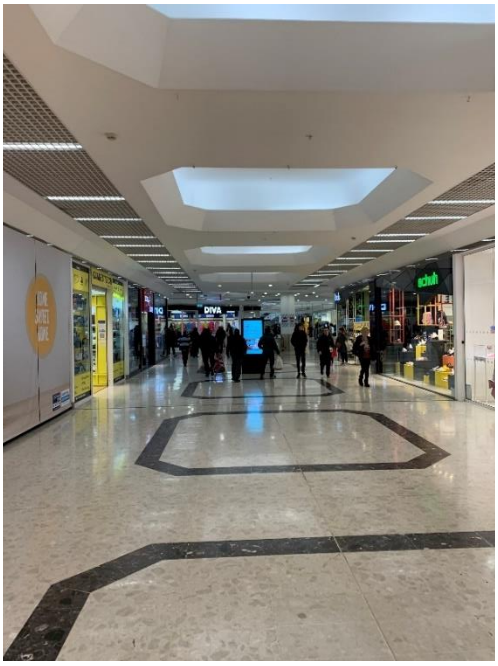
Source: *Government property information* and Foxtons average house prices (July 2022)

Hounslow Metropolitan Centre

Figure 4.1 – View along Hounslow High Street

[4] Used as a general comparator or areas across the borough.

Figure 4.2 – View inside the Treaty Centre



General Description

4.2.5 Hounslow is the Borough's largest town centre and is identified in the London Plan (2021) as a Metropolitan Centre.

4.2.6 The centre is comprised of a large High Street and a number of other shopping streets, as well as two shopping centres; the Treaty Centre; and the Blenheim Centre.

4.2.7 Hounslow as a town centre is performing well - most obviously evidenced by the low vacancy rate. However, this headline rate hides the fact that the mix of retail in Hounslow is very different to other nearby major centres. Hounslow centre contains several national multiple retailers although not in the number or variety as may be found in nearby Ealing, Richmond or (further away) Kingston. Marks & Spencer is absent from Hounslow but remain in other nearby centres (and the Kew Bridge Retail Park in LBRuT). The centre no longer accommodates any department store although this is no longer unusual.

4.2.8 What helps maintain the low vacancy rate is the large number of small independent retailers. Independent retailers are located throughout the centre – including on the main high street – as well as on the periphery of the town centre.

4.2.9 In more recent years, significant investment was made in the Blenheim Centre, which contains an Asda supermarket, as well as B&M, The Gym and others. The long awaited Cinema has now been completed dramatically improving the centres leisure offer and linking the Blenheim Centre into the high street. The centre, in common with others in the Borough has a very strong food and drink offer dominated by small restaurants and takeaways but, until recently, lacked a leisure anchor.

4.2.10 While there has been new investment in the town centre, the main retail anchor remains the Treaty Centre. The Treaty Centre contains retailers such as H&M, Next and River Island – a number of which have moved into space formally occupied by Woolworths. But, in common with many other similar shopping centres the Treaty Centre has a number of vacant units and particularly on upper floors which will be hard to re-use for retail. The space is also hard to reuse for any other purpose given the bespoke design and layout of the units.

4.2.11 We understand that the Treaty Centre is likely to be compressively redeveloped with the Council looking to partner with the freeholder of the shopping centre to secure this.

4.2.12 What is also noticeable in this centre is that independent firms do not appear limited to smaller units with a number of specialist food store/supermarkets taking large units to cater for the local market. Quality Foods (a former Safeway store at the western end of the high street) is the most obvious example.

4.2.13 In summary, the town centre is performing well. Hounslow town centre meets the needs of residents and provides space for a large number of independent retail firms. There are gaps in the offer and some major retailers not present. However, the centre, from a retail perspective, performs well.

Diversity of Uses

4.2.14 A total of 355 retail units were identified within Hounslow Metropolitan Centre during the site visit. The diversity of uses is set out in Table 4.2 below.

Table 4.2 – Hounslow Metropolitan Centre Diversity of Uses

Hounslow Metropolitan Centre – Diversity of Uses			
Category	No. of units	% of total units	% UK
Comparison	128	36.1	27.0
Convenience	49	13.8	9.2
Services	141	39.7	49.4
Miscellaneous	5	1.4	0.5
Vacant	32	9.0	13.9
TOTAL	355	100	100

4.2.15 The proportion of comparison units (36.1%) is above that of the national average (27.0%). There are a number of clothing fashion retailers located along the high street and within the shopping centre, such as New Look, River Island and H&M.

4.2.16 The proportion of convenience units (13.8%) is also above the national average (9.2%). There is an Asda, Lidl and Aldi located within the centre, as well as a number of smaller supermarkets and discount supermarkets.

4.2.17 In terms of services, the main services are health and beauty uses, as well as a number of restaurants and cafes. The proportion of service units (39.7%) is lower than that of the national average (49.4%).

4.2.18 This spread of activity would appear to reflect the large number of small and medium sized independent retail firms, many of which cater for local residents across the comparison and convenience sectors. So, the number of comparison and convenience units may be higher than may be the case in the less *entrepreneurial* areas of the borough.

Proportion of Vacant Property

4.2.19 There was a total of 32 vacant units observed during the site visit. This equates to 9.0% of the total units, which is below that of the national average (13.9%).

4.2.20 There were a number of notable vacant units, including a vacant restaurant on the corner of Bath Road and the High Street and a large vacant unit at the Blenheim Centre.

4.2.21 There is very little vacant space in the Town Centre and the network of smaller independent stores catering to a district local market helps keep the vacancy rates low. Outside the Treaty Centre (including former Debenhams), there are very few vacant units.

Pedestrian Flows

4.2.22 There was found to be a very high footfall of pedestrians all the way along Hounslow High Street flowing in both directions.

4.2.23 There was also found to be a very high footfall at the Treaty Shopping Centre and outside of the Asda food store. At the Blenheim Centre, there is a lower concentration of pedestrians but this partly reflects the lack of any through route from the centre to a major point of interest or transport interchange beyond the Asda supermarket and its car park.

4.2.24 There is limited pedestrian activity along Staines Road and the cluster of stores (Lidl, Home bargains and Aldi) being car dominated and disjointed from the main High Street.

Chiswick Major Centre

Figure 4.3 – View Down Chiswick High Road

General Description

4.2.25 Chiswick is defined as a Major Centre within the London Plan (2021). It is located to the east of the Borough and much of the town centre falls within a Conservation Area. The main street within the centre is Chiswick High Road, with a number of other shopping streets running off

Chiswick High Road. Chiswick High Street has high environmental quality. It contains several small units and the vacancy rate is low. The centre contains a Sainsbury's supermarket, M&S Simply Food and Waitrose. The Chiswick Cinema is located on Chiswick High Road. As well as national multiple retailers, Chiswick contains high-end independent retailers, which is in contrast to Hounslow. Tube stations are present close to the centre including Chiswick Park, Turnham Green and Stamford Brook.

4.2.26 The Centre is close to Hammersmith which is only a couple of stops away by Underground. The Centre is also the closest of the Hounslow centres to Westfield. However, the centre maintains a distinct identity as a linear shopping street.

4.2.27 As with Hounslow, Chiswick accommodates a large number of small stores but they would appear to be branches of high street multiple chains with less reliance on small independent retailers than Hounslow. Chiswick High Road remains popular with casual dining chains. Food, drink and cafes have a strong presence on the high street along with public houses (largely absent from Hounslow).

Diversity of Uses

4.2.28 A total of 375 retail units were observed within Chiswick Major Centre during the site visit. The diversity of uses is set out in Table 4.3 below.

Table 4.3 – Chiswick Major Centre Diversity of Uses

Chiswick Major Centre – Diversity of Uses			
Category	No. of units	% of total units	% UK
Comparison	127	33.9	27.0
Convenience	40	10.7	9.2
Services	187	49.9	49.4
Miscellaneous	2	0.5	0.5
Vacant	19	5.0	13.9
TOTAL	375	100	100

4.2.29 The large number of units reflects the length of the retail high street which almost runs seamlessly into Hammersmith.

4.2.30 The proportion of comparison units (33.9%) is above that of the UK national average (27.0%).

4.2.31 The proportion of convenience units (10.7%) is marginally higher than the national average (9.2%). The two major food stores within the centre are Sainsbury's and Waitrose. There is also a notable number of independent bakeries, butchers and greengrocers.

4.2.32 The largest use is service units (49.9%) which is almost identical to the national average (49.4%). The main services are hairdressers and restaurants. There is also a notable number of estate agencies.

4.2.33 Compared with Hounslow the small and independent stores would appear to be less homogonous with more district operators targeting niche, and sometimes high end, products.

4.2.34 Despite a high quality environment, good public transport and wide range of services, the high street accommodates very little offices. This is despite the centre being close to the creative cluster at Power Road and the major office site at Chiswick Park. In our opinion this is because the high street is elongated and both Power Road and Chiswick park are distinctly different to the high street offer. Chiswick Park provides for the day to day needs of office workers without always relying on the high street.

4.2.35 There is very little industrial property in or around Chiswick High Road.

Proportion of Vacant Property

4.2.36 There was a total of 19 vacant units observed during the site visit. This equates to 5.0% of the total units, which is significantly lower than the national average (13.9%).

4.2.37 The majority of vacant units were smaller units located within well used shopping parades. There was a vacant unit at 10-12 Turnham Green Terrace.

Pedestrian Flows

4.2.38 There is a high concentration of pedestrian footfall along Chiswick High Road outside Sainsbury's and beyond. There were very large clusters of pedestrians observed at the junction with Heathfield Terrace.

4.2.39 Further east along Chiswick High Road, there was found to be high pedestrian footfall. Turnham Green Terrace is busy with pedestrians flowing towards High Road.

4.2.40 Pedestrian footfall at the western part of Chiswick High Road, towards Chiswick roundabout, is more limited, although there is still a steady flow of footfall towards the main shopping parade along the High Road.

Brentford District Centre

Figure 4.4 – View along Brentford High Street

Figure 4.5 – View at Brentford Lock

General Description

4.2.41 Brentford is defined as a District Town Centre in the London Plan (2021) and is the County town of Middlesex. The centre is located at the meeting point of the River Thames, River Brent and the Grand Union Canal. Brentford High Street is formed by a number of shopping parades. Brentford is very close to Hounslow, Chiswick and Richmond, which is the likely explanation for the lack of comparison units in the centre. Kew Retail Park is located close by, which contains 'big-box' comparison retailers such as M&S, Next and TK Maxx.

4.2.42 The centre provides only a very limited range of comparison units with no major national comparison retailers taking space.

4.2.43 Instead, it mainly operates a convenience and limited services function, 'anchored' by the Morrisons.

4.2.44 In regard to services, the offer is limited with no major bank branches remaining in the centre, for example.

4.2.45 However, as is a common theme in Hounslow Borough, Brentford is the subject of significant redevelopment and regeneration. This will include the redevelopment (and replacement) of the Morrisons foodstore and residential development, with a higher town centre population likely to help boost the town centre's health.

Diversity of Uses

4.2.1 A total of 94 retail units were observed within Brentford District Centre during the site visit. The diversity of uses is set out in Table 4.4 below.

4.2.2 The proportion of convenience units (11.7%) is above the national average (9.2%). There was a large number of local convenience stores, grocers and butchers present at the time of the site visit, along with a Morrison's foodstore.

Table 4.4 – Brentford District Centre Diversity of Uses

Brentford District Centre – Diversity of Uses			
Category	No. of units	% of total units	% UK
Comparison	20	21.3	27.0
Convenience	11	11.7	9.2
Services	49	52.1	49.4
Miscellaneous	2	2.1	0.5
Vacant	12	12.8	13.9
TOTAL	94	100	100

4.2.3 The proportion of comparison units (21.3%) is below the UK average (27.0%). There is a very limited number of clothing retailers, with most comparison units comprising of car repairs, pharmacies and small specialist shops, such as hardware stores.

4.2.4 There is a marginally higher proportion of services (52.1%) in comparison with the national average (49.4%). The main services were fast food takeaways and cafes. There is also a large number of hair and beauty salons. However, as noted above the centre has lost it bank branches and the 'services' are generally day to day functions also commonly found in neighbourhood centres.

4.2.5 We have recorded around 100 units in the town centre but these extend along London Road, through the core of the town centre (market square) and towards Kew Bridge. But in terms of function, the town centre is a much smaller core and at either end (London Road / Albany Road Parade) the retail offer operates as a much more local neighbourhood centre.

Proportion of Vacant Property

4.2.6 There was found to be a total of 12 vacant units observed in Brentford District Centre during the site visit. This equates to 12.8% of the total units, which is lower, than, but broadly in line with the national average (13.9%).

4.2.7 The vacant units tend to be smaller units spread out across the town centre. There is a high concentration of vacant units along London Road although at this point the town centre is outside of its core area and these units cannot really be considered as town centre retail property.

Pedestrian Flows

4.2.8 The main concentration of pedestrians is along the High Street, flowing in both directions. Pedestrian activity was found to be high outside of the Morrison's foodstore.

4.2.9 There is high footfall along Albany Parade, although footfall is much lower towards Albany Road.

4.2.10 There were low pedestrian flows along London Road, which is unsurprising due to the concentration of vacant units. There were pedestrian clusters observed in the public space at Brentford Lock.

Feltham District Centre

Figure 4.6 – View along Feltham High Street

Figure 4.7 – View of the shopping parade at Cavendish Terrace

General Description

4.2.11 Feltham is the Borough’s westernmost centre and is identified as a District Centre in the London Plan (2021). Feltham Station is within the centre.

4.2.12 The town centre accommodates significantly fewer units than Hounslow or Chiswick but accommodates the Borough's second largest purpose built shopping centre. The Centre, opened in 2006, contains retailers such as Next, Matalan, Argos, Sports Direct and New Look. The Centre also contains a large Asda supermarket.

4.2.13 There are fewer local independent comparison retailers in Feltham than Hounslow, Chiswick or Brentford but this may reflect the nature of the stock, as outside of the shopping centre, the number of units available is limited.

4.2.14 Unlike Brentford, with a similar number of total units, Feltham has retained a number of banks and high street building society branches. Although only a district centre, in form and function, Feltham is more of a town centre than Brentford with a range of comparison retailers providing the rationale for residents to visit the town centre for its range and depth of retail offer.

4.2.15 Outside of the shopping centre, the town centre is well-provided for in the convenience goods sector, with both Tesco and Aldi supermarkets present. But unlike the other Borough centres, there appears to be fewer local independent stores. There would also appear to be fewer food takeaways. This may be a product of the retail stock – much of which is within the control of the shopping centre even if facing the high street. Also the fact many of the main retailers are still operating in the centre so local firms have not been given the same opportunity as may have been the case when some retailers vacated Hounslow high street for example.

4.2.16 The peripheral areas of the centre, such as on Bedfont Lane, are reasonably well occupied and predominantly contain small units. But these areas do not function as part of the town centre and are more of a local shopping parade – similar to the peripheral areas of Brentford Town Centre where the offer functions as a neighbourhood centre.

4.2.17 To the east of the centre is Leisure West, a leisure park which contains a cinema, bowling, bingo and a few restaurants. The leisure park is not within the town centre boundary, but the leisure offer has historically defined Feltham and until recently accommodated the Borough's only cinema and bowling alley. The Leisure Park is due to be redeveloped for other others with the new Hounslow cinema being a local substitute.

Diversity of Uses

4.2.18 A total of 115 retail units were observed during the site visit. The diversity of uses is set out in Table 4.5 below.

Table 4.5 – Feltham District Centre Diversity of Uses

Feltham District Centre – Diversity of Uses			
Category	No. of units	% of total units	% UK
Comparison	38	33.0	27.0
Convenience	18	15.7	9.2
Services	49	42.6	49.4
Miscellaneous	2	1.7	0.5
Vacant	8	7.0	13.9
TOTAL	115	100	100

4.2.19 The proportion of comparison units (33.0%) is higher than that of the UK national average (27.0%). A number of large units are present at Manor Retail Park, as well as major clothing retailers such as Matalan and Sports Direct within the centre itself.

4.2.20 The proportion of convenience units (15.7%) is higher than that of the national average (9.2%). The main food stores present in Feltham were found to be Tesco, Aldi, Iceland as well as a number of other discount supermarkets and international food stores and butchers.

4.2.21 The proportion of service units (42.6%) is lower than the national average (49.4%). The main services were health and beauty shops, and a large proportion of fast-food takeaways.

4.2.22 Overall; Feltham appears to retain its function as a town centre and has retained a spread of comparison retailers.

Proportion of Vacant Property

4.2.23 A total of 8 vacant units were observed during the site visit. This equates to 7.0% of the total number of units, which is lower than the national average (13.9%).

4.2.24 The majority of the vacant units were small and outside the retail core (including Bedfont Lane which we do not consider to be part of the town centre), although there is a noticeable vacant unit at The Centre shopping centre spread over two floors.

4.2.25 As a town centre the area is functioning very well; there is no evidence of long-term vacancy and where units have been vacated they have been re-occupied.

Pedestrian Flows

4.2.26 Pedestrian footfall is high along the high street in both directions. There was found to be a large cluster of footfall at the outdoor square outside of The Centre shopping centre.

4.2.27 Pedestrian flows were more limited to the western side of the town centre at the Manor Retail Park and Cavendish Terrace shopping parade.

4.3 Large Neighbourhood Centres

4.3.1 There are seven Large Neighbourhood Centres identified within the Hounslow Local Plan. These centres serve the day-to-day needs of local residents and workers, and act as focal points in the Borough’s residential areas. They are:

- Hounslow West
- Bedfont
- Hanworth
- Heston
- Cranford
- Isleworth
- Old Isleworth

Hounslow West

General Description

4.3.2 Hounslow West is located on Bath Road. Hounslow West is centred around Hounslow West station, which is located on the Piccadilly Line. A bus station is also located in the centre. Hounslow West is anchored by a Sainsbury's Local convenience store and Iceland, but lacks a major supermarket. The centre draws trade from local residents and commuters. The centre is characterised by international foodstores and health and beauty stores. The centre contains former retail units which have been converted into wedding venues.

4.3.3 The centre has similarities with Hounslow town centre in that it accommodates a large number of independent retailers and grocers. In terms of independent retail the centre is broadly similar to Hounslow, although lacks international food retailing and certain comparison products sold in Hounslow.

4.3.4 As would be expected for a centre of its size, Hounslow West lacks major comparison brand stores.

Diversity of Uses

4.3.5 A total of 65 retail units were identified within Hounslow West Large Neighbourhood Centre. The diversity of uses is shown in Table 4.6 below:

Table 4.6 – Hounslow West Neighbourhood Centre Diversity of Uses

Hounslow West Large Neighbourhood Centre – Diversity of Uses			
Category	No. of units	% of total units	% UK
Comparison	15	23.1	27.0
Convenience	14	21.5	9.2
Services	31	47.7	49.4
Miscellaneous	0	0.0	0.5
Vacant	5	7.7	13.9
TOTAL	65	100	100

4.3.6 The proportion of comparison units (23.1%) is lower than the UK national average (27.0%) although the proportion of convenience units (21.5%) is significantly higher than that of the national average (9.2%). There are independent foodstores and international food stores present.

4.3.7 The proportion of service units (47.7%) is broadly in line with the national average (49.4%). The major service use present are fast food takeaways, with a high concentration of health and beauty units also observed present.

Proportion of Vacant Property

4.3.8 A total of 5 vacant units were identified, which equates to 7.7% of the total number of units. This is lower than the UK national average (13.9%). Three vacant units were observed at the eastern part of Bath Road.

Pedestrian Flows

4.3.9 There was found to be high pedestrian footfall along Bath Road outside of Hounslow West Underground Station, with a steady footfall observed elsewhere.

Bedfont

General Description

4.3.10 Bedfont is located along Staines Road. The centre is anchored by a Tesco Express; it lacks a major supermarket; but contains a Boots Pharmacy. The proportion of vacant units in Bedfont is higher than most other centres in Hounslow, but is still below the national average. The centre contains a Post Office, hairdressers and several takeaways.

Diversity of Uses

4.3.11 A total of 54 units were identified at Bedfont Large Neighbourhood Centre. The diversity of uses is shown at Table 4.7 below.

Table 4.7 – Bedfont Large Neighbourhood Centre Diversity of Uses

Bedfont Large Neighbourhood Centre – Diversity of Uses			
Category	No. of units	% of total units	% UK
Comparison	12	22.2	27.0
Convenience	10	18.5	9.2
Services	25	46.3	49.4
Miscellaneous	1	1.9	0.5
Vacant	6	11.1	13.9
TOTAL	54	100	100

4.3.12 The proportion of comparison units (22.2%) is lower than the UK national average (27.0%). The proportion of convenience units (18.5%) is double the national average (9.2%). There is a Tesco Express located within the centre, as well as a number of international foodstores and off licences.

4.3.13 In terms of services, the proportion of units (46.3%) is slightly lower than the national average (49.4%). The main service uses present are fast food takeaways and health and beauty salons.

Proportion of Vacant Property

4.3.14 A total of 6 vacant units were identified during the site visit, which equates to 11.1% of the total number of units, marginally lower than the national average of 13.9%.

Pedestrian Flows

4.3.15 The main cluster of pedestrian footfall is identified at the area outside the Post Office, with a steady footfall along the parade.

Hanworth

General Description

4.3.16 Hanworth is a small centre, located on Hampton Road West and Market Parade. It contains a Boots Pharmacy. Hanworth Park is located to the west of the centre. The centre is fully occupied, bar one vacant unit.

Diversity of Uses

4.3.17 A total of 27 units were identified within Hanworth Large Neighbourhood Centre. The diversity of uses is shown at Table 4.8 below.

Table 4.8 – Hanworth Large Neighbourhood Centre Diversity of Uses

Hanworth Large Neighbourhood Centre – Diversity of Uses			
Category	No. of units	% of total units	% UK
Comparison	7	26.0	27.0
Convenience	6	22.2	9.2
Services	12	44.4	49.4
Miscellaneous	1	3.7	0.5
Vacant	1	3.7	13.9
TOTAL	27	100	100

4.3.18 The proportion of comparison units (26.0%) is broadly in line with the UK national average (27.0%). There was found to be a number of car garages located within the centre.

4.3.19 The proportion of convenience units (22.2%) is higher than the national average (9.2%), the majority of which were convenience foodstores and wine stores.

4.3.20 The proportion of service units (44.4%) is slightly lower than the national average (49.4%). The main services were fast food restaurants and cafes.

Proportion of Vacant Property

4.3.21 There was only one vacant unit observed in Hanworth during the site visit. This equates to 3.7% of the total units which is significantly lower than the national average (13.9%). The vacant unit is located at 14 Hampton Road West.

Pedestrian Flows

4.3.22 There was found to be a high level of pedestrian footfall at the pedestrianised area of Market Parade.

4.3.23 There were other more limited clusters of footfall identified at the pedestrianised area south of Hampton Road West outside Kerr House.

Heston

General Description

4.3.24 Heston neighbourhood centre is focused on New Heston Road. The centre does not contain a retail anchor; however, a Nisa Local convenience store is present. Heston has benefitted from the recent investment of Heston Leisure Village, which includes a swimming pool, gym, other sports facilities, library and village hall. This investment will help attract retailing to Heston. Due to the elongated nature of the centre, there is some evidence of some of the town centre being re-developed for residential uses, particularly at the Heston Road end of the centre. The centre lacks independent and specialist shops, such as those present in Hounslow West.

Diversity of Uses

4.3.25 A total of 34 units were observed at Heston Large Neighbourhood Centre during the site visit. The diversity of uses is shown at Table 4.9 below.

Table 4.9 – Heston Large Neighbourhood Centre Diversity of Uses

Heston Large Neighbourhood Centre – Diversity of Uses			
Category	No. of units	% of total units	% UK
Comparison	4	11.8	27.0
Convenience	5	14.7	9.2
Services	19	55.9	49.4
Miscellaneous	1	2.9	0.5
Vacant	5	14.7	13.9
TOTAL	34	100	100

4.3.26 The proportion of comparison units (11.8%) is less than half of the UK national average (27.0%), The proportion of convenience units (14.7%) is higher than the national average (9.2%). All of the convenience units were convenience food and wine stores.

4.3.27 The majority of units observed were service units (55.9%) which is higher than the national average (49.4%), with several fast-food takeaways, along with estate agencies and hair and beauty salons present.

Proportion of Vacant Property

4.3.28 A total of 5 vacant units were observed during the site visit, which equates to 14.7% of the total units. This is higher than the national average of 13.9%. A cluster of these vacant units were located along Heston Road.

Pedestrian Flows

4.3.29 The footfall was proportionate to the role of a neighbourhood centre and found to be centred on the shopping parade at 156-178 Heston Road, with a large concentration at the Post Office.

Cranford

General Description

4.3.30 Cranford is located to the east of, and close to, Heathrow Airport, along Bath Road. There are several hotels in the immediate area (Moxy, DoubleTree, Ibis and so on). This makes Cranford unique when compared with other centres in Hounslow, as it attracts trade from hotel visitors as well as local residents. The centre predominantly provides a top-up function, along with services such as takeaways, estate agents and bookmakers, but lacks comparison uses.

Diversity of Uses

4.3.31 A total of 33 units were observed in Cranford Large Neighbourhood Centre during the site visit. The diversity of uses is shown at Table 4.10 below:

Table 4.10 – Cranford Large Neighbourhood Centre Diversity of Uses

Cranford Large Neighbourhood Centre – Diversity of Uses			
Category	No. of units	% of total units	% UK
Comparison	5	15.1	27.0
Convenience	9	27.3	9.2
Services	16	48.5	49.4
Miscellaneous	0	0	0.5
Vacant	3	9.1	13.9
TOTAL	33	100	100

4.3.32 The proportion of comparison units (15.1%) is lower than the UK national average (27.0%), whereas the proportion of convenience units (27.3%) is higher than the national average (9.2%). A Tesco Express is located within the centre, along with a number of other convenience food and wine stores and independent foodstores.

4.3.33 The proportion of service units (48.5%) is broadly comparable with the national average (49.4%). The majority of services present are fast food takeaways.

Proportion of Vacant Property

4.3.34 Just 3 vacant units were observed during the site visit, which represents 9.1% of the total number of units. This is lower than the national average of 13.9%. The vacant units are all small units.

Pedestrian Flows

4.3.35 There was found to be high pedestrian footfall at the junction with Berkley Avenue.

Isleworth

General Description

4.3.36 Retailing in Isleworth is predominantly located along London Road. Isleworth is sandwiched in between Brentford (to the east) and Hounslow (to the west). Due to the competition, Isleworth performs as a lower order centre with fewer comparison goods retailers than larger centres. The centre contains a train station, meaning it attracts trade from commuters. Trade is also drawn from students of West Thames College, located close by. Isleworth is anchored by a Sainsbury's Local convenience store, but lacks a major supermarket. The centre is fully occupied with no vacant units present.

Diversity of Uses

4.3.37 A total of 46 units were observed in Isleworth Large Neighbourhood Centre during the site visit. The diversity of uses is shown in Table 4.11 below.

Table 4.11 – Isleworth Large Neighbourhood Centre Diversity of Uses

Isleworth Large Neighbourhood Centre – Diversity of Uses			
Category	No. of units	% of total units	% UK
Comparison	9	19.6	27.0
Convenience	9	19.6	9.2
Services	27	58.7	49.4
Miscellaneous	1	2.2	0.5
Vacant	0	0	13.9
TOTAL	46	100	100

4.3.38 The proportion of comparison units (19.6%) is lower than the UK national average (27.0%). The proportion of convenience units (19.6%) is higher than the national average (9.2%). There were a number of local food and wine stores located in the centre, as well as a Sainsbury's foodstore (as mentioned above).

4.3.39 The majority of units were found to be service units, with the proportion (58.7%) exceeding the national average (49.4%). The main services were local cafes, as well as a large number of barbers and beauty salons. Natwest bank is also located within the centre.

Proportion of Vacant Property

4.3.40 There were no vacant units observed during the site visit.

Pedestrian Flows

4.3.41 The highest footfall identified during the site visit centred around Isleworth station. While many pedestrians were visiting the station the cluster of retail, including the post office and several convenience stores, also attracted visits that were unconnected to the station.

4.3.42 There were clusters of pedestrians in the centre of London Road and outside the Natwest Bank.

4.3.43 While this area forms a distinct little retail cluster, centred around the station and post office, the western edge starts to blend into an extended run of retail uses that extends towards Hounslow town. This pattern is common along London Road and, to some extent the Great West Road.

Old Isleworth

General Description

4.3.44 Old Isleworth is a historic centre, clustered around an old village green. Its retailing is focused along South Street. The centre contains a Co-op convenience store, but lacks a major supermarket. The centre contains few comparison units and performs a mostly top-up and services function for its local residents. There is no major public transport hub in Old Isleworth, just buses running through the centre. The centre contains an attractive green space, adjacent to Londis.

Diversity of Uses

4.3.45 A total of 35 units were identified at Old Isleworth Large neighbourhood centre during the site visit. The diversity of uses is shown in Table 4.12 below.

Table 4.12 – Old Isleworth Large Neighbourhood Centre Diversity of Uses

Old Isleworth Large Neighbourhood Centre – Diversity of Uses			
Category	No. of units	% of total units	% UK
Comparison	5	14.3	27.0
Convenience	5	14.3	9.2
Services	22	62.8	49.4
Miscellaneous	0	0	0.5
Vacant	3	8.6	13.9

TOTAL	35	100	100

4.3.46 The proportion of comparison units (14.3%) is lower than the UK national average (27.0%). The proportion of convenience units (14.3%) is higher than the UK national average (9.2%).

4.3.47 The majority of units (62.8%) were service units, exceeding the UK national average (49.4%). There was a high number of beauty salons identified, as well as fast-food takeaways and professional services.

4.3.48 A unit in Old Isleworth (2 South Street Isleworth; Glass Merchant) recently received prior approval in January 2022 for change of use from retail to two flats subsequent to being vacant for at least 3 months. The retail use of glass merchant is not traditionally found in a neighbourhood centre, but rather more likely located within an industrial estate.

Proportion of Vacant Property

4.3.49 There were three vacant units identified during the site visit, comprising 8.6% of the total units within the centre. This is below the UK national average (13.9%). Two of these vacant units were located together and adjacent to the Swan Inn public house.

Pedestrian Flows

4.3.50 Unlike other neighbourhood centres, footfall was lower with main pedestrian flows in Upper Square moving in both directions around the centre and at Shrewsbury Walk parade. The centre lacks a major attractor such as a post office and is not a major public transport interchange such as Isleworth Station.

4.4 Small Neighbourhood Centres

4.4.1 There are 36 small neighbourhood centres listed within the Hounslow Local Plan (2015). The size of these centres ranges from just three shops (56-60 Kew Bridge Road and 2-8 Clifton Parade) to larger centres of 25 units (309-355 Vicarage Farm Road).

4.4.2 Table 4.13 below shows the number of units, diversity of uses and proportion of vacant property for all the 36 small neighbourhood centres. Each centre has been given a reference of 1-36 in the order in which they are listed within the Local Plan.

Table 4.13 – Small Neighbourhood Centres

Ref.	Centre	TOTAL	Comp.	Conv.	Serv.	Misc.	Vac.
Chiswick Area							
1	2-30 Fauconberg Road	**14**	2	4	6	0	2
2	1-15 Grove Park Road	**7**	2	2	3	0	0
3	54-68 Thames Road	**6**	1	1	3	1	0
4	1-10 Stile Hall Parade	**23**	3	2	16	0	2
Chiswick High Road							
5	391-407 Chiswick High Road	**10**	2	2	6	0	0
6	1-18 The Broadway, Acton	**15**	3	2	8	0	2
Isleworth and Brentford area							
7	1-9a Spur Road and 142-156 London Road	**12**	1	2	9	0	0
8	248-262 Twickenham Road	**8**	2	2	3	0	1
9	189-227 Twickenham Road	**17**	4	4	8	0	1
10	153-173 and 154-164 Thornbury Road, Osterley	**17**	4	0	12	0	1
11	56-60 Kew Bridge Road	**3**	0	1	2	0	0

Ref.	Centre	TOTAL	Comp.	Conv.	Serv.	Misc.	Vac.
12	1-19 Albany Parade	**17**	5	2	7	0	3
Central Hounslow Area							
13	59-63 Heath Road and 2-20 Central Parade	**18**	3	5	7	1	2
14	34-56 Lampton Road	**12**	1	3	3	0	5
15	Wellington Road South and Staines Road Junction	**15**	4	6	5	0	0
16	244-254 and 315 Wellington Road South	**6**	0	1	5	0	0
17	87-99 Whitton Road	**6**	3	0	3	0	0
18	1-7 Green Parade, 135 and 158 Whitton Road	**7**	0	3	2	0	2
19	43-65 and 80-90 Kingsley Road	**18**	3	7	8	0	0
Cranford and Heston Area							
20	1-8 Parklands Parade	**8**	4	2	2	0	0
21	53-75 Salisbury Road, off Green Lane	**9**	0	0	4	1	4
22	309-355 Vicarage Farm Road	**25**	9	2	12	1	1
23	204-228 Great West Road and 44-50, 64- 80 and 141A Vicarage Farm Road	**20**	3	4	13	0	0
24	474-514 Great West Road and 1 Heston Road	**20**	1	4	14	0	1
25	146-150, 160-164 and 174-178 Brabazon Road	**8**	1	2	4	1	0
26	182-190 North Hyde Lane	**5**	0	2	3	0	0
27	620-634 Bath Road and Public House	**8**	4	1	3	0	0
West Area							
28	182-194 and 220-232 Uxbridge Road	**13**	2	3	6	0	2
29	1-10 Hamilton Parade	**9**	3	2	3	0	1
30	2-8 Clifton Parade	**3**	0	2	1	0	0
31	1-10 Central Parade	**7**	0	1	0	0	6
32	36 Staines Road, 1-6 Baber Bridge Parade and PH	**8**	1	2	5	0	0
33	90-108, 111-129 Harlington Road West and 141-145 Staines Road	**21**	2	6	12	0	1
34	1-11 Rochester Parade, 97-109 High Street and 1-9 Parkfield Parade	**24**	3	3	15	1	2
35	101-111 Bear Road and 201 Swan Road	**5**	1	1	1	1	1
36	49-67 Hounslow Road, 1a Park Road and Petrol Station	**13**	3	2	6	0	2

Diversity of Uses

4.4.3 As would be expected for centres ranging from three units to 25 units, the small neighbourhood centres focus on convenience and services functions, rather than comparison or non-food shops.

Proportion of Vacant Property

4.4.4 16 of the 36 small neighbourhood centres had no vacant units at all. Centres with no vacancies include:

- 1-15 Grove Park Road
- 54-68 Thames Road
- 391-407 Chiswick High Road
- 1-9a Spur Road and 142-156 London Road
- 56-60 Kew Bridge Road
- Wellington Road South and Staines Road Junction
- 244-254 and 315 Wellington Road South
- 87-99 Whitton Road
- 43-65 and 80-90 Kingsley Road
- 1-8 Parklands Parade
- 204-228 Great West Road and 44-50, 64- 80 and 141A Vicarage Farm Road
- 146-150, 160-164 and 174-178 Brabazon Road
- 182-190 North Hyde Lane
- 620-634 Bath Road and Public House
- 2-8 Clifton Parade
- 36 Staines Road, 1-6 Baber Bridge Parade and PH

4.4.5 Those Small Neighbourhood Centres which have higher vacancy rates, are generally not reflective of demand for units in neighbourhood centres. 34-56 Lampton Road has five vacancies, although it is next to Hounslow Central station, it is located on the edge of town centre and so suffers slightly to maintain long term tenants. 53-75 Salisbury Road has four vacancies, and suffers from being an aging purpose built centre that is not in demand and is not easily converted for other uses. 1-10 Central Parade is currently undergoing regeneration.

Pedestrian Flows

4.4.6 Unsurprisingly, pedestrian footfall is higher at the small neighbourhood centres with higher number of unts, with highest footfall observed at centres numbered 6, 22, 23, 24 and 34.

5 Industry

5.1.1 Most of this report is focused on the Borough's retail centres – this is also where offices are often located or when not in town centres on larger out of town estates including Chiswick Park and Bedfont Lakes or the Great West Corridor KEOL. Where rights risk the vibrancy of the town centres this can be addressed via selective A4D directions.

5.1.2 However, there is also a potential risk of strategic harm to the remainder of the borough's employment portfolio. As we note below, the prior approval process helps mitigate conflict risks today. But does not address the lack of flexibility that is introduced when new uses arrive.

5.1.3 The London Plan approach is reliant on the regeneration of London's industrial portfolio for more intensive industrial uses to meet the need for land/property over the whole plan cycle and beyond. Constraining this flexibility risks increasing the future need for new land.

5.1.4 The GLA's 'Strategic evidence to support London borough Article 4 Directions (commercial to residential)' recognises the important role strategic office clusters located in urban business parks outside of town centres, such as Chiswick Park and Bedfont Lakes, play in contributing to the economy and employment in outer London. The report notes however that this contribution could be significantly reduced by Class E to residential permitted development rights.

5.1.5 The Mayor supports A4Ds to remove Class E to residential permitted development rights to safeguard the strategic office functions associated with these locations. These should be targeted accordingly drawing on more detailed local evidence. Where relevant, A4Ds for these areas should also have regard to the wider potential impacts of Class E to residential PDR on the vibrancy of town centres of which they are part of.

Industrial Protection

5.1.6 The GLA's 'case' to protect industrial sites is particularly relevant here. Hounslow accommodates one of the largest reservoirs of protected industrial land in London and, as set out in the emerging Local Plans, needs to identify more industrial land thrust forward by a growing logistics sector. An update of the Plan Period Employment Numbers (November 2021) requires provision for a minimum of 2,014 jobs (vs 1,638 up to 2034) and 284,147 sqm of industrial space (vs 252,784 up to 2034).

5.1.7 The strength of this sector has long been associated with Heathrow but also the need to service a growing London population. Accommodating Heathrow related logistics is a particular challenge due to the nature of the airport logistics operation – operating 24 hours a day with significant HGV traffic movements. Developers and operators have long made the case that they struggle to be accommodated on mixed sites and most remaining brownfield sites are already constrained. They cannot accommodate the bulk, scale, mass and intensity of industrial operations that can fit in a complex mixed urban environment. The Borough has made the difficult choice to propose release of Greenbelt land to accommodate this exceptional growth and provide sites with no (or limited) constraints.

5.1.8 As we note below previous policies actually supported 'ancillary' uses within protected sites because the risk that they could conflict with core industrial uses was limited but this is no longer the case. Any use previously supported as 'ancillary' and complementary could now, through the operation of UCO E, change use with unintended consequences.

What is the possible threat to the Boroughs industrial portfolio?

5.1.9 Units could benefit from the Class MA change of use right, or the new ZA demolish and rebuild right.

5.1.10 As regards ZA; the ZA right does, via part 2(i) require consideration of "the impact on business and new residents of the development's introduction of, or increase in, residential use in the area in which the development is to take place" which may provide some limited protection where a current conflict is identified.

5.1.11 Similarly, the Class MA prior approval process allows consideration of the established industrial users on the new (E class) use. Which should ensure that new residential occupiers are in some way protected from conflicting neighbouring uses. But these prior approval considerations - for both Class MA and ZA rights - are based on an assessment which represents a 'snapshot' in time whereas the Borough, and London plan, is looking to further intensify and change the character of the Boroughs industrial portfolio.

5.1.12 So for the Borough, whether or not prior approval can be rejected on the basis of conflicts observed today, is a juxtaposed position with the objective of the industrial portfolio to be flexible over time.

5.1.13 This flexibility is particularly vital if the market is to, as the GLA would encourage, intensify their sites and operation. With a depleted reservoir of older industrial estates across London those occupiers who genuinely need the flexibility of an industrial site are seeing their choices tightening over time and focused on the remaining large sites including those in Hounslow.

The threat to intensification

5.1.14 The intensification of London's industrial portfolio is a charged issue following the London Plan Inspectors finding that the GLAs intensification aspiration (to limit the need for new industrial land) was aspirational but not necessarily realistic. Since the London Plan was published the GLA has been working to develop a series of intensification pilot projects to build developer interest.

5.1.15 These pilots are, at the moment, progressing with mixed success - but as industrial and logistics values increase, developers are increasingly looking to more intensive formats – so the direction of travel would support intensification even if we cannot evidence it as source of supply to meet demand/need today. Even if this source struggles to meet demand today, and hence possible greenbelt releases, it should become an important source over time.

5.1.16 But what has become clear is that a true intensive industrial format, the next generation of the X2 unit at Heathrow for example, requires a very specific and unconstrained site.

5.1.17 Below we illustrate one of the emerging GLA pilot projects in Newham (G Park). This was being promoted as a next generation logistics warehouse tailored to meet the booming last mile delivery sector. Tesco, Amazon and other retailers were suggested as tenants. It is a format that could meet strategic needs but more obviously, as this unit is specified, the booming last mile market as goods increasingly flow through warehouses as opposed to retail property. As a format it is would be attractive in Hounslow, where logistics demand is very high.

G Park Newham

5.1.18 This Newham site has not yet secured planning permission and we understand that one challenge relates to the intensity of traffic movements on / off the site as the activity is intensified.

5.1.19 But for our purpose the illustration shows that the massing of this GLA/London plan encouraged property format is such that any residential in the near proximity to the unit could be unacceptable. At this site neighbouring uses are 'heavy' industrial, including an operational aggregate wharf the Tate and Lyle factory.

5.1.20 There are no active proposals for a similar property in the Borough at the moment. But were their market interest here, the Borough would direct this to the large SIL sites in the west of the borough. Or be proactively included in a masterplan approach elsewhere – for example as part of the GWC regeneration. This regeneration is led by the creative industry sector but policy does not rule out the prospect of intensive industrial formats and indeed these may be needed to re-accommodate existing tenants on the sites.

5.1.21 Obviously; it would be impossible to progress a scheme of this nature with a conflicting use established adjacent. Were housing located adjacent to this style of unit it is very likely this massing would be refused or the promoter be required to work with neighbours with obvious complication and ransom opportunity.

5.1.22 So, the availability of PDR as a route to introduce conflicting uses could undermine the London and Borough plans longer term approach to securing sustainable development in Hounslow and making the best use of the industrial portfolio.

Which sites/areas are most at risk?

5.1.23 Before we discuss the general typology of industrial sites in the Borough it is useful to highlight that previous rounds of Borough policy was permissive of smaller supporting or ancillary uses within the designated employment areas.

5.1.24 So, even where policy may provide a clear industrial direction, it was long seen that some uses complimented the core use while not constraining the operation of the site.

5.1.25 In this Borough policy ED2 of 2015 Local Plan made positive provision for ancillary uses including cafes and creches to co-locate within industrial areas. At the time that policy was developed, planning permission would have been required for a change of use and also possible redevelopment. Other parts of ED2 were drafted to ensure that the policy 'priority' was always to protect the core economic use.

5.1.26 As regards where exactly these units have emerged this has never been formally plotted. As supporting uses to employment sites they would never have been identified as a 'problem' or cause for concern and a mix of uses on sites is what would be expected to be observed as part of any site assessment. A vibrant and successful estate is very likely to offer cafes and other (now E) class uses. Never, at the time of previous assessment, would these uses have been considered a threat. The Borough is not alone in this and detailed, property by property, assessments of employment areas are very uncommon because they are not generally considered 'proportionate' plan making evidence.

5.1.27 As an example of where a future issue could emerge is the Bradley Business Centre which is located on the North Feltham Trading estate. The estate is almost exclusively industrial and is arguably a product of successful planning with recent new investment where older units have been redeveloped for new, purpose built, modern warehousing. These are not intensified formats (as per GLA) but modern and more efficient units of older property they replaced.

5.1.28 The Business centre accommodates small offices and cafe uses in part of the estate that has yet to be modernised. If these units are converted to residential this is likely to hinder ongoing regeneration of the area.

5.1.29 From our experience of assessing the Borough's profile, properties such as this are not common in Hounslow because the Borough's stock is reasonably modern and purpose built. So these smaller uses, in older property, have often already been redeveloped. But on close inspection retail uses have, over time, been introduced into many of the estates. For example, to the north of North Feltham is the Heathrow International Trading Estate, which is fronted by a small business unit scheme (Walbrooke). This we understand accommodates some retail activities and a small office scheme which could, depending on thresholds, be converted and in turn potentially limit longer term scope to intensify the industrial sites.

5.1.30 So Hounslow, along with most other boroughs, cannot identify exact properties by UCO across their estates. Evidence only suggests E class is integral to many estates. Policy has supported the development and retention of E class property because they were previously seen to be complimentary and not harm the flexibility of the estates. But that was before there was any prospect of residential.

5.1.31 Finally, it is fair to say that should use class E have been available when Stantec last assessed the Borough's sites in detail we may have recommended a different approach to policy E2 with a less cautious 'welcome' to these uses.

SIL and LSIS

5.1.32 The Borough's portfolio is generally split between strategic and non-strategic sites. There is almost no vacant or surplus stock in the Borough and a constant need to push for 'net additional' development proposals.

5.1.33 But as regards A4Ds, and risk of PDR, it is useful to consider local and strategic sites separately. This is mostly because any Strategic Site – a Strategic Industrial Location as set out in the London Plan – carries with it the policy weight of the London Plan and its E7 intensification objective. As discussed above E class uses could significantly hinder the ability of this portfolio to bring forward more intensive formats over time.

5.1.34 Local sites (LSIS) are particularly suitable for accommodating a range of industrial and related uses which, by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements, can raise tensions with other land uses, particularly residential development. But do not have the same protection as SIL and do not have the same intensification objectives as SIL. Many are already mixed or, because they are much smaller, already working around residential constraints.

5.1.35 Arguably, the prior approval route should help address immediate concerns regarding conflicting uses and without the intensification pressure reduce the risk of future conflicts. Our opinion is however that any and all land or property within LSIS sites should always be prioritised for economic uses given the chronic shortfall of employment land the Borough has evidenced to support the emerging local plans. The Local Plan Review Employment Numbers Update (November 2021) sets out a gross development demand of 284,147 sqm of industrial floorspace for 2019-2034. The loss of smaller E class units from the local estates is likely to disproportionately effect the Borough's smaller firms and further pressure the small industrial stock. We know from the Borough's evidence, the ELR, that there is shortage of smaller industrial property and very limited, if any new small industrial supply. So for these sites the 'conflict' issue remains relevant but as smaller, flexible sites, less of a strategic concern. But the lack of industrial supply in the Borough would help justify the rationale to protect smaller industrial sites where many units (light industrial) would now be Class E.

5.1.36 We can see a strong economic rationale to limit the scope of PDR in the Borough's SIL sites – and particularly the West of Borough sites that are in the strongest demand and require the greatest flexibility. These SIL sites are regionally, if not nationally significant, as major logistics hubs. If these struggle to flex and innovate over time this may only increase the future need to release more new land that, by its new delegation, is free of E class constraints. As noted these sites do not have much E class property but even a small number of units threatens the flexibility of the sites.

5.1.37 Finally, a number of SIL sites are scheduled for redevelopment in the emerging plans. Where SIL sites are being ‘regenerated’ by the emerging local plans, there remains a rationale because new conversions could hinder this regeneration.

The Creative Industries

5.1.38 The Mayor’s ‘Strategic evidence to support London borough Article 4 Directions’ acknowledges the important role in London’s economy and its cultural offer creative industries play. Article 4 Directions to remove Class E to residential PDR may be particularly appropriate in creative industry clusters to ensure that suitable business space and affordable workspace is available for existing creative businesses and for new start-ups.

5.1.39 This issue is particularly pertinent for Hounslow borough, as the continued growth of the creatives sectors is identified in the emerging GWC Plan. The strong role of the sector is further justified by the Mayor of London’s designation of a Creative Enterprise Zone in the Great West Road, a sector that requires ‘hybrid’, ‘flexible’ or ‘multifunctional’ spaces that may be used as offices, light industrial units or a mixture of the two. The Council’s strategy is to meet it through provision of ‘flexible industrial uses’ in the Creative Enterprise Zone through the GWC Plan to focus on delivering space for this sector. Class E PDRS however could undermine these objectives and the growth of this sector.

6 Overall Conclusion

6.1.1 The London Plan promotes town centres through Policies SD6-SD9 as strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses, night-time economy, civic, community and social infrastructure and appropriately planned residential uses. It seeks to strengthen their role as an important focus for Londoners' sense of place and local identity in the capital and it promotes their adaptation and diversification supported by ambitious and innovative strategies at the local level.

6.1.2 It is recognised that the new Class E to residential PDR, in the absence of targeted Article 4 Directions, could potentially impact London's vibrant town centres and high streets and risk undermining the recovery efforts.

6.1.3 To this end, The London Plan supports regular town centre health checks to inform strategic and local policy and implementation, whereby Boroughs should introduce targeted Article 4 Directions where appropriate and justified to remove permitted development rights for office, light industrial and retail to residential in order to sustain town centre vitality and viability and to maintain flexibility for more comprehensive approaches to town centre housing and mixed-use intensification.

6.1.4 Despite changes in consumer behaviour, technology and competition from out-of-centre development, Hounslow Borough's defined centres have been found to be in better health than many other centres nationally. Even smaller units on the periphery of the centres are well-occupied by independent businesses. Vacancy rates are low, with centres generally having a proportion of vacant units that is below the national average.

6.1.5 Where property is vacated, recent experience suggests, there is still motivation to relet it as commercial space. We note that part of the reason for this may be that the stock of property has, overtime, been adjusted to fit the retail need which means units cannot easily be converted with physical development needed to change the building form itself. But also our assessment has highlighted the large number of independent and entrepreneurial independent firms, that help make the Borough's centres so vibrant, showing there is clearly demand for space to remain within the E class.

6.1.6 If the economics of the market shift to make residential significantly more attractive this status quo however may change and, unfortunately, this can be rapid – as Richmond saw when the office to residential rights were announced.

6.1.7 As regards future A4Ds this report demonstrates that the Boroughs retail high street economy is generally performing well. Space is in demand. So, in general terms, the loss of retail space should continue to be resisted. Article 4 directions could have a role to play in this by encouraging those considering alternative use to explore other end uses as opposed to a possible residential default.

6.1.8 For the boroughs employment sites maintaining the 'integrity' of the industrial policy areas is critical to their long term success. For these sites, the lack of residential uses is core to their attractiveness. Hounslow has some of the largest extents of Strategic Industrial Land in London and, close to Heathrow some of the most expensive and in demand industrial stock. The need for this stock to operate 24/7 to service the airport (and residents) means that any erosion in this flexibility risks the efficient operation of the nationally significant airport. Hounslow SIL sites, in common with others, often include elements of offices or small commercial units that, in the past, were seen as complementary to the industrial use. Or if not complimentary did not conflict. With the new Use Class Order and increased flexibility without additional control the Borough can no longer ensure that these uses do not emerge over time. We note that the SIL sites are long term assets that can and have changed over time. So a snapshot which only looks at the uses established on site today, and their possible alignment with flexible E use property today, is not the right lens with which to assess the areas and the PDR risk. Instead a long term view is needed that protects the scope for an industrial use to intensify and change.