



HOUNSLOW LOCAL PLAN (2020-2041) EXAMINATION STAGE 1 HEARINGS NOTE: RETAIL AND MAIN TOWN CENTRE USES NOTE (MARCH 2026)

SAINSBURY'S COMMENTS ON THE COUNCIL'S RESPONSE TO REQUESTS FROM THE INSPECTORS DURING THE MATTER 4

1. We have reviewed LBH's Stage 1 Hearing Note dealing with retail and main town centre uses (MTCUs). LBH's note responds to matters raised at the hearing held in Week 2 of Stage 1 on Tuesday 27th January 2026.
2. We wish to comment on the following matters:
 - a) The quantitative and qualitative need for retail and MTCU floorspace in the Plan;
 - b) Clarification of the extent to which site allocations in the Plan address the qualitative and quantitative need for retail;
 - c) Accessibility gaps in retail and main town centre provision;
 - d) Clarification of, and justification for, the intended status of Neighbourhood Centres;
 - e) The quantum of retail floorspace in Allocated Site 107 - Sainsburys, Chiswick;
 - f) The impact test threshold in Policy TC3 C); and
 - g) How the Plan will address Class E.
3. We deal with the above matters under the same numbered subheadings as per the Council's response.

2. and 3. The quantitative and qualitative need for retail and MTCU floorspace

4. The Council deal with quantitative and qualitative need in their response in Sections 2 and 3 of their response.
5. The Retail Study Update 2024 (EBED2 and EBED2a) updates the 2018 Retail Study (EX32a). At paragraph 2.2, it is noted that the evidence base confirms that there is not any significant further need for either convenience or comparison floorspace within the Borough for the duration of the planned period. We comment on the overtrading at the Sainsbury's store at Chiswick below.
6. However, the Great West Corridor (GWC) Masterplan Revision (EBCC4) notes that there is the potential to deliver 24,600sqm of retail space within the GWC (see 7.1.1 of EBCC4). There must be a concern that the development of the quantity of retail floorspace envisaged to be delivered in the GWC could undermine the vitality and viability of existing centres.
7. It is not clear how this quantum of new floorspace is factored into the retail evidence base. Paragraph 7.2.21 of the 2018 Retail Study (EX32a) simply refers to some of the retail need from Brentford being met in a new local centre. The Inspector should be aware that there is a potential discrepancy on the amount of retail provision in the Borough.
8. The GWC Masterplan Revision (EBCC4) retail allocations should be assessed, and the Council should explain where this has been undertaken, and the modification (as suggested to be added by the Council) could deal with this.
9. Paragraph 3.11 states that the Local Plan enables certain main town centre uses outside existing town centre boundaries by setting policy criteria through the Spatial Strategy and TC1Part E alongside Site Allocations, that allow such development in specific circumstances. We agree that small scale retail facilities that meet the need of local people and workers should be supported.



10. However, development outside one of borough’s four town centres will conflict with Policy TC3 parts A, C, F, G and H, as well as Policy TC5 E.
11. If a retail use of 500sqm is promoted outside one of the four town centres, even if it is in a Large Neighbourhood Centre (see below) or it is a Local Centre allocated in the GWC Masterplan Revision (EBCC4), the applicant will have to address the sequential and impact tests set out in Policy TC3. As far as we can see, there are no exceptions to this.
12. For these reasons, we consider that the retail threshold for the impact test should be updated (see below).
13. The proposed modification EP_C3_02 is helpful, but does not address proposals of 500sqm in Large Neighbourhood Centres which will still have to address the sequential and impact tests set out in Policy TC3. Also, there will be examples of convenience retail proposals of 500sqm (gross) outside of existing centres, which are provided to primarily support the needs of local residents and employees. Such proposals will be sustainable, but will need to address the tests in Policy TC3. It does not seem fair that it is appropriate for new residents and employees in the GWC to have local facilities, but residents in established residential and employment locations cannot.
14. These concerns can be solved if the impact threshold is set at a level that allows small shops, of 280sqm (net) to be delivered without having to pass the sequential and impact tests, we address this further in respect of Response 6.

4. Clarification of the status of Neighbourhood Centres

15. Since ‘Large Neighbourhood Centres’ are what the NPPF describes as ‘Local Centres’, it might be simpler to call them ‘Local Centres’ to avoid any confusion.
16. The GWC Masterplan Revision (EBCC4) refers to ‘Local Centres’. It is not clear whether these are Large or Small Neighbourhood Centres.
17. As noted, retail proposals over 500sqm in Large Neighbourhood Centres and Local Centres identified in the GWC Masterplan Revision (EBCC4) will be subject to sequential and impact tests because of the wording of Policy TC3. This conflicts with the NPPF which supports retail development in Local Centres.

5. Evidence of the Retail Quantum at Site 107 - Sainsburys, Chiswick

18. The facts of the performance of the Sainsbury’s store at Chiswick are set out in Table 4 in Appendix B of the Retail Needs Study Update 2024, Volume 2 (EBED2a). They are as follows:

Table 1: The Performance of the Sainsbury’s Store in Chiswick

Gross floorspace	Net sales	Net convenience sales	Sales density	Benchmark convenience turnover	Survey turnover	Turnover from outside survey area	Total turnover	Overtrading
(Sqm)	(Sqm)	(Sqm)	(£/sqm)	(Sqm)	(£m)	(£m)	(£m)	(£m)
6,931	3,989	3,391	12,686	43.0	53.3	2.8	56.1	13.1 (30%)
(74,605 sqft)	(42,938 sqft)							

19. As set out above, Table 4 in Appendix B of EBED2a correctly identifies the gross floorspace of the existing Sainsbury’s Chiswick store at 6,391sqm whilst demonstrating the significant level of overtrading at the store. The existing floorspace stated in the Council’s own evidence base is substantially higher than is currently stated within Site Allocation 107 (5,300sqm) with no rationalisation within the evidence to justify



the proposed reduction in floorspace. Contrarily, the Council’s evidence suggests the need for an increase in retail floorspace at Sainsbury’s Chiswick store to accommodate overtrading.

- 20. The convenience turnover of the store is £56.1m, so it is the best trading town centre store in the Borough, and only the out of centre Tesco Extra at Syon Lane in Isleworth performs better. It is overtrading by £13.1m which is 30%. To address the overtrading of £13.1m, the store would need to be extended by over 1,000sqm (10,764 sqft). This overtrading of 30% is significant and is not acknowledged in the Retail Needs Study Update 2024 **(EBED2)**.
- 21. Table 14 in Appendix C of EBED2a confirms that the store’s comparison turnover is £1.2m, Therefore, the store’s total turnover is £57.3m. The convenience turnover of Chiswick town centre can be derived from Table 4 in Appendix B (£103.6m) and the comparison turnover from Table 14 in Appendix C (£62.8m+£1.2m = £64m). Therefore, the total turnover of Chiswick town centre is £167.6m.
- 22. This is set out in the table below.

Table 2: Sainsbury’s Role in Chiswick

Turnover of Chiswick town centre		Turnover of Sainsbury's Chiswick	
Convenience	103.6	56.1	54%
Comparison	64.0	1.2	2%
Total	167.6	57.3	34%

- 23. With the turnover of Chiswick town centre being £167.6m, it means that Sainsbury’s accounts for 34% of Chiswick town centre’s total turnover, and 54% of its convenience turnover.
- 24. Despite this, Site Allocation 107 refers to the retail element of the redeveloped site as being 5,300sqm and does not refer to the size of the car parking provision. A store of 5,300sqm is a reduction in the floor area of 1,631sqm or 24%.
- 25. To put this into perspective, the table below shows the level of overtrading at the store if the store’s convenience turnover remains as it is, which the Council surely want to safeguard the vitality and viability of Chiswick town centre, it will be overtrading by over 70%. Such a high level of overtrading will impact on the attractiveness and customer experience within the store, meaning that shoppers are less likely to shop there.

Table 3: Overtrading if the Store Size is Restricted as Allocated

	Gross floorspace	Net convenience sales	Sales density	Benchmark convenience turnover	Total turnover	Overtrading	
	(Sqm)	(Sqm)	(£/sqm)	(Sqm)	(£m)	(£m)	%
Sainsbury's now	6,931	3,391	12,686	43	56.1	13.1	30%
Sainsbury's at 5,300 sqm	5,300	2,593	12,686	32.9	56.1	23.2	71%

Notes: This assumes the same convenience net: gross as existing, and the same company average turnover.



26. In short, given how the Sainsbury's store is performing, and its importance to the health of Chiswick Town Centre, reducing the size of the Sainsbury's store is likely to have a significant adverse impact upon the performance of Sainsbury's, and the vitality and viability of Chiswick town centre.
27. There is no real reason given by the Council for the proposed reduction in the store's size, other than a figure of 50,000sqft (4,645sqm) was referenced ten years ago in the Call for Sites exercise. At paragraph 5.2 the Council stated that:

"The Council therefore considers that despite the evidence suggesting that the store is performing well, the development quantum in the Site Allocation represent the optimal capacity for an allocation both housing and retail on the site. Given the importance of conserving nearby heritage assets, any increase in one land-use component would necessitate a corresponding reduction in the other"
28. However, we have not seen any evidence that the Council has sought to maximise the residential capacity on the site, or maintain a successful retail store. There is no evidence that increasing the retail floorspace would have a knock on effect on the quantum of residential space. There is no evidence that the quantum in the Site Allocation represent the optimal capacity for both housing and retail on the site.
29. The Council acknowledged the need to support town centres (paragraph 2.2), but reducing the size of the most important store in Chiswick does not do this. In simple terms if we assume that the reduction of the store's size by 24% (and because the 5,300sqm figure is gross rather than net, the reduction in trading floorspace might be more). If we assume (conservatively) that this would also reduce the turnover by 24% (£13.5m) there is likely to be a significant adverse impact on Chiswick town centre. The Council's evidence confirms the level of trading overperformance by the Sainsbury's store, it is illogical to redevelop an anchoring store in the town centre with a smaller replacement store as currently drafted in Site Allocation 107.
30. In order to safeguard the vitality and viability of Chiswick town centre, it should be made clear that the replacement Sainsbury's store should be as a minimum the same size as the existing store (6,931sqm), rather than 5,300sqm.
31. The Council stress that the quantum in the allocation are minimums, and the Council has a record of applying them flexibly (paragraph 5.4). If this is the case, at the very least, the allocation should state that the quantum recorded are minimums and will be applied flexibly.
32. Furthermore, since 91.5% of the store's turnover (£52.4m) is generated through physical transactions in store, it is vital that the allocation allows for the re-provision of an appropriate level of car parking and adequate servicing. This should be confirmed in the allocation.

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

33. Policy TC3 C) sets an impact assessment threshold of 500sqm for retail development outside the four town centres. This applies not only edge of, and out of centre developments, but also developments in large Neighbourhood Centres and the allocations identified in the GWC Masterplan Revision (EBCC4).
34. This conflicts with TC3 E) which states that the Council will support small scale retail development in identified Neighbourhood Centres. It is unclear whether this is just large Neighbourhood Centres or all Neighbourhood Centres. If it is just large Neighbourhood Centres, it is another reason to use the term Local Centres to avoid confusion.
35. Policy TC3 C) also conflicts with paragraph 94 of the NPPF which only expects retail impact assessments for out of centre developments.
36. Sainsbury's are concerned that this threshold is too low and will impact on the delivery of convenience stores which serve the needs of local residents and employees. Sainsbury's Local format stores have a net sales area of 280sqm which allows them to trade on Sundays. Often a store of 280sqm (net) can have a gross floorspace of 500sqm. If this was the case, a retail impact assessment would be necessary.



37. A Local store's catchment is around 800m, and it will be visited on foot. The turnover will be around £3.3m. A turnover of this magnitude is simply so low that there is no prospect of there being a significant adverse impact on existing centres. We are aware that the 500sqm threshold is applied in other London Boroughs, but we can confirm that we have never had an application for a Local store refused in London because the impact was deemed to be significantly adverse.
38. The NPPF confirms that an impact assessment should include assessment of:
 - a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
 - b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).
39. For such a small scale store, this is very difficult to do. A Local store's catchment is around 800m, and it will be visited on foot. The turnover will be around £3.3m. There is no realistic prospect of such a minor development will have any adverse impact upon existing, committed and planned public and private investment. There is no prospect of a store of this scale having a significant impact on the vitality and viability, including local consumer choice and trade, of an existing centre. Undertaking an impact assessment is futile.
40. The 500sqm threshold is just 20% of the NPPF's suggested threshold of 2,500 sqm. There is simply no analysis as to why the threshold in Hounslow should be so much lower than the national threshold. There is no suggestion that centres in Hounslow are so fragile that they need additional protection.
41. The threshold creates a layer of complication that is simply not necessary and delays determination of applications. In our experience, it serves no purpose, but adds to cost and delays.
42. We suggest that if the 500sqm figure is to be retained, it should be specified as 500sqm of net floorspace. This would exclude small convenience stores that meet local needs, or if it is to be a gross threshold, it is raised to 750sqm or 1,000sqm to exclude small convenience stores.

7. Clarification of how the Plan will address Use Class E

43. In Sainsbury's experience, the introduction of Use Class E has been positive and has helped investment in town centres and elsewhere by allowing Sainsbury's taking units that would otherwise be vacant.
44. Class E was introduced to provide greater flexibility and adaptability within town centres, enabling developers to respond swiftly to changing market needs. The Government's stated objectives for Class E were clear: to better reflect the diversity of high street and town centre uses; to provide greater flexibility for adaptation to changing demands within units; and to support a broader range of uses throughout the day and week.
45. For these reasons, the Council should not seek to restrict and control Class E through the use of the use of planning conditions, S106 agreements and Article 4 Directions, as is alluded to in paragraphs 7.1 and 7.3. Reasonable conditions imposing active frontage requirements, minimum unit sizes and/or hours of operation or delivery/servicing arrangements can be appropriate provided they do not make units commercially unviable. However, conditions that are used to remove the flexibility afforded by Class E and to retain units within a particular use class or a sub-use within Class E are likely to be unacceptable. Although the intention might be to discourage the change to a use other than retail, it may also mean that restrictions are put to keep units within other sub-uses which means that they cannot be used for retailing. For example, preventing Uses within sub-use E(g) or E(f) being used for retailing (sub-use E(a)). In our view, imposing restrictive policies or conditions that differentiate between operations within the Class, such as distinguishing between retail, creches, medical uses, or office uses fundamentally undermines the spirit and original purpose of Class E
46. It is both unnecessary and contrary to paragraph 56 of the NPPF to suggest in paragraph 7.3 that conditions might be paired with S106 agreements to further strengthen requirements in specific circumstances.