



Hounslow Local Plan Examination

Response to Matter 9 – Site Allocations

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



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

Introduction

1. On behalf of our client, Sainsbury's Supermarkets Ltd (SSL), we welcome the opportunity to respond to the Inspectors MIQs relating to the Stage 2 of the independent examination of the Hounslow Local Plan.
2. SSL has been involved in the London Borough of Hounslow (LBH) Local Plan Review process since 2016. In December 2023, SSL submitted representations to the Regulation 18 consultation on the emerging Hounslow Local Plan following the Council's decision to combine several draft Volumes into a single consolidated document, within which its store in Chiswick Town Centre (the site) has been allocated for redevelopment to provide a mixed-use residential development including a reprovided foodstore. SSL submitted representations to the Regulation 19 consultation on the consolidated Hounslow Local Plan in October 2024.
3. Most recently, WSP appeared on behalf of SSL at the Stage 1 Examination Hearing on 27th January 2026. We also responded to the Council's Stage 1 Follow Up Retail Note (EX50) in April 2026.
4. SSL's store in Chiswick is located within the designated town centre and provides an important opportunity to deliver a town centre mixed-use redevelopment, providing new homes, new retail space – contributing to the revitalisation of Chiswick High Road. SSL's store is proposed for allocation on this basis under Site Allocation 107 'Sainsbury's Chiswick' in the draft Hounslow Local Plan for 300 new homes and 5,300sqm of replacement retail floorspace. SSL's response to the MIQs is made with regard to Site Allocation 107
5. The following response to the Inspectors' MIQs is made within the context of the preceding representations and does not supersede these, but rather emphasises and adds to the important factors that the Council and Inspector should consider, to find the new Local Plan sound.

ISSUE – Whether the proposed allocation of sites in the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?

Q1) Are the proposed site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?

6. SSL supports the allocation of its Chiswick store (Site 107) for mixed-use development, but the allocation needs to reflect its requirement to have an appropriately sized replacement store with adequate car parking and servicing.

Q2) Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect viability and delivery of any of the site allocations?

7. Site Allocation 107 notes a number of heritage constraints and states that development is required to conserve, preserve or enhance the assets' significance where heritage impacts have been identified. The implication is that building heights will be limited and required to demonstrate that the appropriate heights in Policy CC3 can be delivered without causing substantial harm to heritage assets.
8. The use of prescribed maximum heights is inflexible and conflicts with London Plan Policies D3 and D9, and Local Plan Policy SC4 Part C). It will prevent the optimisation of sites.
9. Policy CC3 allows proposals to be assessed on a case-by-case basis in accordance with London Plan Policies D3 and D9. The overly prescriptive and restrictive approach in the allocation will prevent acceptable development coming forward through a design led approach that can demonstrate that greater heights are appropriate. Sainsbury's appeared at the Lewisham Examination and made similar points. The Lewisham Plan includes a recognition that building over the height parameters identified by the Borough-wide assessment can be supported if it can be demonstrated through the design-led approach that it is acceptable in townscape terms, and will deliver wider planning benefits.
10. In the case of Site Allocation 107, the evidence base, the Hounslow Tall Buildings Study confirms that the modelled building heights are directly informed by the site-specific Design Code in the Hounslow Characterisation and Growth Study.
11. It goes on to state that the proposals for the site have been modelled and incorporated into the VuCity model following the principles set within the Design Code for the site, set out in the Hounslow Characterisation and Growth Study. This is despite the fact that the Design Code scheme did not include a replacement foodstore for SSL, and did not make the best use of the site. In short, the starting point for the evidence base is flawed.
12. Notwithstanding this, using the VuCity model, it assesses the building heights on whether the tall buildings are visible from Chiswick Town Centre and wider area.
13. It is clear that being able to see a tall building does not necessarily mean that it is harmful. If the height has an impact on the setting of heritage assets, the degree of harm must be weighed against the benefits of the proposal.
14. The assessment of Impacts on Townscape and Views at paragraph 7.9.35 and Table 7.18 addresses visibility, limiting visibility and concealment. This simply not a robust or balanced assessment, and clearly does not optimise the use of the site.
15. The visibility of a tall building from a townscape perspective and in the setting of a heritage asset does not necessarily equate to harm. Where harm does occur to the setting of a heritage assets, the Framework provides a clear process for decision makers to follow when considering the degree of harm against the benefits of the proposal.
16. In summary, the Hounslow Tall Buildings Study started with, and assessed, a flawed scheme, and then produced a superficial analysis that unduly restricts the development potential of the site.
17. These failings reinforce the need to incorporate flexibility within Policy CC3 to ensure that a design-led approach can be applied to ensure that housing delivery and development capacity is optimised at the allocation and constraints do not prevent development or impact viability of the allocation.

Q3) Are the proposed site allocation boundaries justified and effective?

18. The site allocation boundary encompasses the land in SSL's single ownership. SSL is working with an experienced development partner with a track record of delivery to promote the site for redevelopment., Therefore, Site Allocation 107 is a suitable, available and deliverable site with the

ability to bring forward a higher quantum of housing and retail floorspace than is currently proposed in allocation, early in the Plan Period.

19. The site is in Sainsbury's freehold ownership and SSL welcomes the opportunity to provide new homes on the site. It is imperative, however, that any proposal at the site meets SSL's retail needs and is viable to ensure deliverability. Therefore, higher density development should be promoted as part of the allocation than is presently proposed.
20. The site is a successfully performing foodstore, overtrading at £13.1m (EBED2a). As such, for the site to be available and deliverable, a commensurate sized (or larger) (30%) foodstore with adequate car parking and servicing must be provided to ensure the viability of the proposed allocation, the continued vitality of the town centre and to ensure shoppers have the same access to shopping opportunities in a town centre location.

Q4) Are the assumptions regarding the capacity of the sites in terms of density of development and net developable areas justified and what are these based on?

Retail Capacity

21. During the Stage 1 Examination Hearing, at matters raised in Week 2 (27th January 2026), WSP noted that the Council's own evidence base established an understanding that the existing Sainsbury's store has a floorspace of 6,931 sqm (7,000sqm previously noted by WSP in representations to Regulation 19 consultation), and that the store is significantly overtrading. WSP questioned whether the Council had justification to contradict its own evidence base by reducing the floorspace to 5,300sqm in Site Allocation 107.
22. The Council's Stage 1 Follow Up Retail Note (EX50) does not provide sufficient clarification or justification to the level of retail floorspace allocated at the site, and WSP have provided a separate response to the EX50, submitted 20 April 2026.
23. 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%)
(74,605sqft)	(42,938sqft)							

24. As set out above, 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 explanation within the evidence to justify the proposed reduction in floorspace. Indeed, the Council's evidence suggests the need for an increase in retail floorspace at Sainsbury's Chiswick store to accommodate overtrading and to support the vitality and viability of Chiswick Town Centre.
25. 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).

26. 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.

27. 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%

28. 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.

29. 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%.

30. To put this into perspective, the table below shows the level of overtrading if the store's convenience turnover remains as it is, but the store size is reduced. The table shows that the store will be overtrading by more than 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. This in turn will detrimentally impact the vitality and viability of the town centre.

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.

31. 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.

32. 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 of EX50, 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”

33. 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 amount of residential space. There is no evidence that the amounts set out in the Site Allocation represent the optimal capacity for both housing and retail on the site.
34. 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.
35. 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.
36. The Council stress that the amounts in the allocation are minimums, and the Council has a record of applying them flexibly (paragraph 5.4 of EX50). If this is the case, at the very least, the allocation should state that the amounts recorded are minimums and will be applied flexibly.

Residential Capacity

37. The site provides a significant opportunity to contribute towards Hounslow’s housing targets, delivering sustainable, high-density mixed-use development on a brownfield, town centre site. Therefore, the proposed allocation should seek to maximise development potential at the site to ensure viability and deliverability of a key housing site. Emerging Local Plan Policy SC1: Increasing Housing Supply states: “Hounslow aims to deliver a minimum of 28,840 homes by 2041”.
38. Section Q of Policy SC1 states that the Council will expect development proposals to: “Make effective and efficient use of land by seeking to optimise housing densities, so long as this is achieved without detriment to the character of the site and/or surrounding context”.
39. As drafted, the site is proposed to be allocated for 300 residential units. The previous iterations of the plan allocated the site for 390 homes, representing a 23% reduction in proposed homes.
40. There is no justification for reducing the number of units to be delivered on the site. Previous feasibility work has strongly indicated that 400 units can be comfortably accommodated on the site while ensuring that an appropriate foodstore with adequate parking and servicing can be accommodated.
41. Given that national, regional and local planning policies support the redevelopment of Sainsbury’s Chiswick store on the basis that it is a town centre, brownfield site with excellent transport links, the allocation should be updated to reflect that the site should be optimised to deliver a minimum of 390 homes and a new appropriately sized food store with adequate car parking & servicing for the food store.
42. Furthermore, turning to building heights set out within the draft allocation, as stated above, we understand that these heights have been informed solely by the extent to which built form could impact key heritage sensitive views. This approach does not allow for any detailed design considerations to be applied i.e. how the buildings would appear in the views, nor does it allow for the wider planning balance to be considered which could provide sufficient justification for buildings being visible in these views.

43. The overly prescriptive and restrictive approach will prevent acceptable development coming forward through a design led approach that can demonstrate that greater heights are appropriate.
44. It is recommended therefore that the prescriptive heights are removed to ensure that a design led approach is brought forward on the Site, which is developed during pre-application engagement with the Council and other key stakeholders. Without such flexibility within the policy wording, setting restrictive development parameters would hinder the delivery of the site

Q5) Are the expected timescales for development in terms of lead in times and annual delivery rates for each site allocation, realistic and supported by evidence?

45. As mentioned above, the site is highly deliverable, within SSL's single ownership and it is being promoted with an experienced development partner. The site is suitable and available, and the timescales for development are achievable. Therefore, the site provides a significant opportunity to deliver much-needed homes early in the Plan Period and contribute to Hounslow's 5-year supply. It is critical however that the parameters for development are set flexibly within the Site Allocation to allow a design-led approach to deliver a viable redevelopment of the site.

Q6) Does the Plan sufficiently make clear the infrastructure requirements for each of the allocated sites, together with the timing of and dependencies upon such infrastructure for their delivery?

46. The Site Allocation fails to make clear the requirement for adequate levels of parking to re-provided on site as part of the replacement foodstore. Without adequate parking, as mentioned above, a replacement foodstore will not be deliverable.
47. The Access and Movement requirements of Site Allocation 107 reference that redevelopment should provide an appropriate level of car parking to support the retail use, which is helpful. However, the plan no longer refers to the quantum of parking supporting the replacement store and LBH have removed reference from previous iterations of the Plan to the minimum parking quantum of 7,600sqm. The site allocation must make it clear that appropriate provision of parking to serve the retail function will be permitted as a critical piece of infrastructure to support redevelopment.
48. The Site Allocation states that development should conform to the maximum parking standards in the London Plan. The importance of providing adequate parking for SSL's store customers must be recognised and flexibility on the application of standards incorporated to allow for parking should be considered on a case-by-case basis.
49. The London Plan facilitates flexibility to provide increased parking numbers where necessary in Policy T6.3 and Table 10.5.
50. Table 10.5 of the London Plan stipulates that new retail development should not provide car parking in areas of PTAL 5 and 6. The Chiswick store is identified as having a PTAL of 4/5. However, SSL objected to this aspect of the London Plan prior to its adoption, on the grounds that it would jeopardise the redevelopment opportunities of SSL's London stores. As a direct result of the objection, the Secretary of State directed that Policy T6.3 be amended to include flexibility on parking provision.
51. We note that in the Statement of Common Ground between LBH and TfL (Examination document ref: EX5a), TfL state that:

"We strongly reiterate that wording should make clear this development would be expected to be car free. Where car parking is mentioned wording should be changed to 'provide an appropriate level of disabled person's parking'".
52. However, we also note that in the same document, TfL are willing to take a more realistic approach to the Treaty Centre in Hounslow Town Centre (Site 117), which has a higher PTAL of 6a/6b, but where TfL accept that re-provided car parking is acceptable if it is clearly justified.

53. TfL's approach to the redevelopment of the Sainsbury's store is not realistic, viable or helpful. Over 45,000 physical transactions occur each week in store (excluding online transactions) so physical transactions equate to 91.5% of the store's trade. Inadequate parking will force shoppers to drive to stores that do provide parking. Invariably, these will be out-of-centre. This will result in significant trade diversion from SSL's in-centre store to out-of-centre stores. The Chiswick store supports linked trips and is the key anchor for the town centre. Having inadequate car parking for the replacement Sainsbury's store will not only undermine the viability of the allocation, but also the vitality and viability of Chiswick Town Centre.
54. We are aware of the recent appeal decision for the redevelopment of the existing Waitrose store at Alexandria Road, Ealing W13 0NL (appeal ref: APP/A5270/W/24/3347877). The Inspector disagreed with TfL on the issue of replacement car parking for a replacement foodstore. TfL suggested that because the site was within a town centre, the new supermarket should have no car parking. The Inspector noted that this approach fails to account for the fact that what is proposed is a replacement supermarket. At paragraph 61, the Inspector concluded that:
- "Issues have been raised around parking. The amount of car parking serving the supermarket would reduce significantly as part of the scheme, though not to the extent suggested by the GLA [footnote 9, which states: The GLA suggests that being part of a town centre, the new supermarket should have no car parking but that in my view fails to account for the fact that what is proposed is a replacement supermarket]. I am content that with proper management, something that can be secured by condition, this reduction need not cause issues for those who live around the site. Indeed, it would not be in the commercial interests of the retailer to allow parking issues to undermine the experience of their customers"*
55. In short, the Inspector recognised that it is unrealistic to insist that a replacement foodstore should not have replacement car parking to serve the store.
56. For these reasons, the confirmation that car parking should be appropriate to support the retail use is the only text that is required. The reference to the London Plan is only likely to cause confusion and it should be deleted.

Q8) Are any modifications required to ensure that the individual site allocations and/or their development requirements identified in Chapter 12 of the Plan are accurate and sound?

57. In summary, SSL supports the Council's ambition to deliver a mixed-use redevelopment at the Sainsbury's Chiswick Site (Site 107). However, we are concerned that the Council is restricting the landowners and future developers from achieving the desired outcome of delivering a comprehensive redevelopment that makes the best use of the site by including unhelpful and unviable restrictions.
58. We seek modification to the site capacities stated in the allocation.
59. The retail floorspace is incorrect at 5,300sqm currently set out in the allocation. The figure should be revised to **a minimum of 7,000sqm**, to accurately reflect the existing store and protect the vitality and viability of Chiswick Town Centre. An appropriate amount of car parking and servicing should also be clearly stated to ensure that the operation of the replacement foodstore is viable. The Council's Stage 1 Hearing Retail Follow Up Note (EX50) is unhelpful in providing reasoned justification for the discrepancies between the Plan and its own evidence base, and to avoid undermining soundness of the Plan should be withdrawn.
60. In addition, the residential capacity should be amended to state **a minimum of 390 homes** required, in line with previous iterations of the Plan, reduced to 300 homes without justification.
61. We also consider that it should be recognised that adequate car parking should be provided to support the retail use, and the reference London Plan should be deleted.