

September 2020

SYON GARDENS

HOMEBASE BRENTFORD SITE, TW7 5QE

Retail/Town Centre Use Planning Statement

Consultant: WYG Planning





Redevelopment of Tesco Osterley store & Homebase store sites, Syon Lane, Brentford

Retail/Town Centre Use Planning Statement

Prepared on behalf of St Edward Homes Limited

September 2020



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Contents

1.0 Introduction.....	1
1.1 Introduction	1
1.2 Context for this Statement	1
1.3 Evidence Base and Methodology	2
1.4 Structure of Statement.....	3
2.0 The Sites and the Proposed Developments	4
2.1 Introduction	4
2.2 The Application Sites.....	4
2.3 The Proposals.....	7
2.4 Existing and Proposed Retail & Commercial Floorspace	9
3.0 Planning Policy Context.....	12
3.1 Introduction	12
3.2 The Development Plan	12
3.3 Material Considerations	13
3.4 Summary	16
4.0 The Sequential Approach to Site Selection.....	17
4.1 Introduction	17
4.2 Methodology	17
4.3 Sequential Site Analysis - Proposed Relocated Tesco Store, Homebase Site.....	18
4.4 Sequential Site Analysis – Local Retail, Commercial & Community Provision, Tesco Site	28
4.5 Conclusions Regarding the Sequential Approach	32
5.0 Retail Impact	33
5.1 Introduction	33
5.2 Methodology	35
5.3 Impact on Existing, Committed and Planned Investment.....	36
5.5 Conclusions on Impact.....	48
5.0 Conclusions	50
5.1 Introduction	50
5.2 The Proposals.....	50
5.3 The Sequential Approach to Site Selection.....	51
5.4 Retail Impact.....	51
5.5 Overall Conclusions.....	52

Appendices

Appendix A - Retail/Town Centre Use Planning Statement Scoping Note

Appendix B - Experian Goad Plans showing vacancies in Brentford Town Centre, Hounslow Town Centre and Hanwell District Centre.

1.0 Introduction

1.1 Introduction

- 1.1.1 This Retail/Town Centre Use Planning Statement has been prepared by WYG Planning on behalf of St Edwards Home Limited in respect of two planning applications on the Tesco Osterley and Homebase store sites, Syon Lane, Brentford, for:

Tesco Osterley store site:

"Outline planning application with all matters reserved except access for the demolition of existing building and car park and erection of buildings to provide residential homes, plus flexible non-residential space comprising commercial, business and service space, and/or learning and non-residential institution space, and/or local community space, and/or public house/drinking establishment, and/or a mobility hub, along with associated access, bus turning, car and cycle parking, and landscaping arrangements."

Homebase store site:

"Full planning application for the demolition of existing building and car park and erection of buildings to provide residential units, a replacement retail foodstore, with additional commercial, business and service space, and a flexible community space, and ancillary plant, access, servicing and car parking, landscaping and associated works"

- 1.1.2 St Edward Homes Limited is bringing forward the redevelopment of both the Tesco Osterley and Homebase Brentford sites. The existing Tesco store would be re-provided on the Homebase site as part of a mixed-use development with residential above, which releases the opportunity to deliver a comprehensive residential-led mixed-use development on the Tesco site.
- 1.1.3 Due to the relationship between the proposed developments on the Tesco and Homebase sites, this statement provides an analysis of the retail/town centre use planning issues associated with the two proposals.

1.2 Context for this Statement

- 1.2.1 This statement addresses the relevant retail/town centre use policy tests set out in the statutory development plan and the National Planning Policy Framework (NPPF). For town centre use proposals not in a centre and not in accordance with an up to date development plan, the NPPF advises that the following issues should be taken into consideration in assessing their acceptability:

-
- The sequential approach (paragraphs 86 & 87); and
 - An impact assessment (paragraph 89).

1.2.2 The latter includes an assessment of:

- 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
- 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).

1.2.3 The NPPF advises that where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused. However, notwithstanding this, it should be noted that in the case of *Zurich Assurance Limited v North Lincolnshire Council* judgment [2012] EWHC 3708 (Admin), the Court confirmed that the failure of the sequential approach or retail impact tests and the consequent presumption of refusal, is just one consideration which the Local Planning Authority (LPA) must balance against other considerations to see whether or not it is outweighed by other such considerations. The retail/town centre use policy tests addressed here are just one consideration.

1.2.4 Whilst this assessment has been undertaken on the basis of the old use classes which preceded the new class classifications, the effects of the new classifications which came into force on 1 September 2020 have been considered. It is not considered the changes will affect the results of the assessment and the effects have been accurately reported.

1.3 Evidence Base and Methodology

1.3.1 The National Planning Practice Guidance (NPPG) 'Town Centres and Retail' section confirms how the Government intends policies within the NPPF should be applied in practice. It provides recommendations and advice for applicants when preparing retail/town centre use statements in support of planning applications. The guidance is intended to help developers, retailers, and operators of other key town centre uses when preparing planning applications involving town centre uses and to assist LPAs when considering these types of applications.

1.3.2 The NPPG sets out advice on the key evidence which is required to support applications and confirms how the sequential approach and impact tests should be applied. The evidence base and methodology adopted in this Retail/Town Centre Use Planning Statement has full regard to the advice and recommendations set out in the NPPG.

1.3.3 In line with the NPPG (paragraph 17) we have agreed the scope and level of detail of this statement with the London Borough of Hounslow. The agreed Scoping Note is attached at **Appendix A**. Further details are set out in the relevant sections of this statement.

1.4 Structure of Statement

1.4.1 The remainder of the statement is structured as follows:

Section 2: sets out the context for the proposed developments by providing background information on the site and relevant planning history.

Section 3: sets out the relevant planning policy context.

Section 4: considers the sequential test.

Section 5: provides an impact assessment.

Section 6: sets out the conclusions of the assessment.

2.0 The Sites and the Proposed Developments

2.1 Introduction

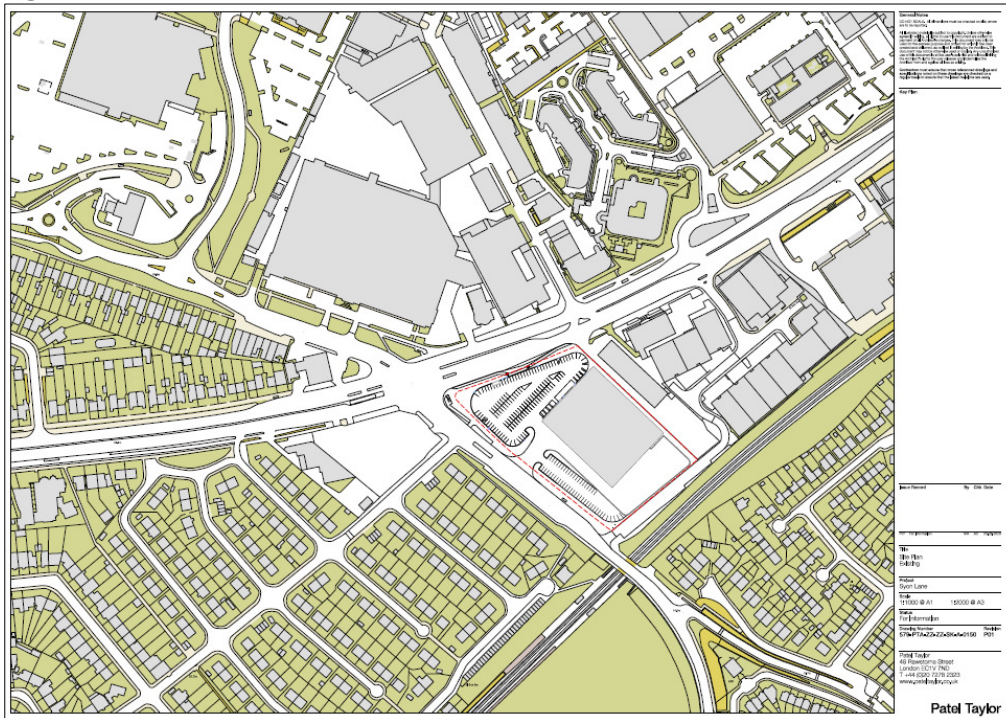
2.1.1 This section of the statement provides a brief description of the application sites, surroundings and a summary of the proposals.

2.2 The Application Sites

Homebase Store Site

- 2.2.1 The Homebase Site is a rectangular plot of land located on the corner of Syon Lane and the Great West Road at Gillette Corner. It has an area of approximately 1.4 ha.
- 2.2.2 The site is developed with a large Homebase store (4,180sq m gross) and associated surface car parking and under-croft car parking (295 spaces). The Homebase store comprises of a large industrial style shed with metal cladding. The building is effectively two storeys high with a central pylon to the front.
- 2.2.3 The site is bound by the A4 Great West Road to the north, and Syon Lane to the south-west. There is a car showroom to the east, and a service road, Syon Gate Way which extends along the south-eastern boundary, and further along is the railway line.
- 2.2.4 Syon Lane station is in Zone 4. National Rail services direct to London Waterloo, Richmond and Weybridge. Furthermore, Osterley Station provides access to the Piccadilly line service and is within 2km of the site.
- 2.2.5 The site is well served by bus routes with seven regular bus services within walking distance of the site. The H28 bus route runs along Syon Lane and stops and turns around at Tesco Osterley. The H91 can be accessed from the A4 at bus stops K/C respectively and serves destinations which include Chiswick, Hammersmith and Hounslow Town Centre.
- 2.2.6 The immediate surrounding area comprises a mix of uses including commercial and residential development. There are semi-detached houses on the western side of Syon Lane, opposite the site. Along the Great West Road there is a variety of commercial and industrial uses as well as some residential uses, and further along Syon Lane the uses are predominantly residential.

Figure 2.1: Homebase Store Site, Site Location Plan



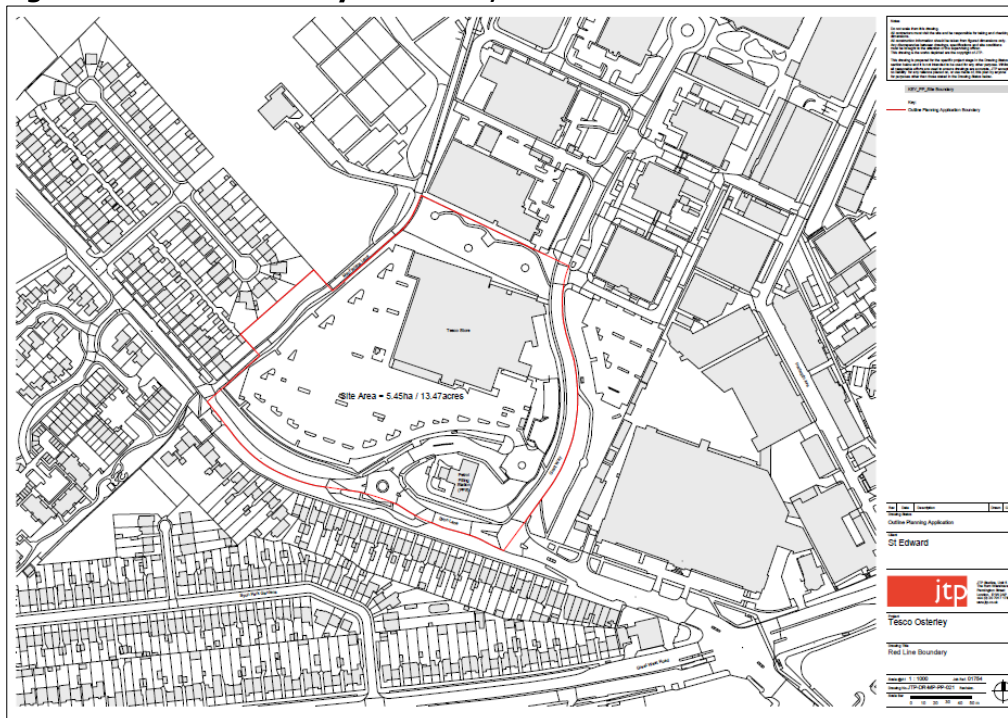
Tesco Osterley Store Site

- 2.2.7 The 5.45ha site encompasses the existing two storey Tesco Extra store at Osterley Park, Syon Lane, TW7 5NZ. It comprises a total of circa 11,582 sqm GIA of retail floorspace, associated car parking (625 spaces), a petrol filling station and a rectangular shaped open space, located in the north of the site, known as the “Water Gardens”.
- 2.2.8 The site lies to the north of Syon Lane, with MacFarlane Way and Grant Way providing the western and eastern boundaries respectively. The Sky Campus is adjacent to the site to the north and Osterley Park partially borders the site to the west.
- 2.2.9 The site is in close proximity to Syon Lane Station which is less than 600 metres to the south. Syon Lane station is in Zone 4. Platform 1 trains go towards Brentford and London Waterloo, whilst Platform 2 trains are directed towards Feltham and Twickenham.
- 2.2.10 There are a number of bus routes located around the site, including Route H28 which provides a local service towards Hounslow East and Bulls Bridge roundabout in Hayes, and Route H91, which provides an east-west connection along the A4 Great West Road between West Hounslow and Hammersmith. A bus stop providing Route H28 is available within the site.
- 2.2.11 The site is located within the Great West Corridor (GWC) Opportunity Area, which is a major commercial area that follows the A4 and M4 corridors between Brentford and Chiswick, known as the ‘Golden Mile’. This strategic policy area has been identified in the Hounslow Local Plan 2015-2030 and forms an important, strategic corridor from Heathrow Airport into central London. The Intend to Publish London

Plan seeks the delivery of 7,500 new homes and 14,000 new jobs in the Great West Corridor Opportunity Area. LB Hounslow's emerging Great West Corridor Local Plan Review identifies this site for residential-led mixed-use, to include a focal area containing retail frontage and public space.

2.2.12 To the south and east of the site, there is the Great West Road. The site is adjacent to the Sky Campus which is part of the Great West Road Industrial Business Park and designated as a Strategic Industrial Location (SIL). To the northwest of the site, Goals Gillette Corner is designated as Metropolitan Open Land.

Figure 2.2: Tesco Osterley Store Site, Site Location Plan



2.2.13 The sites, just 260 metres distance apart, are located circa 1km walking distance from Brentford Town Centre, approximately 2.5km walking distance from Hounslow Town Centre and circa 3.5km walking distance from Hanwell District Centre (within Ealing Council administrative area). The closest defined neighbourhood centres are:

- Spur Road/London Road Small Neighbourhood Centre located approximately 400 metres walking distance to the south from the Homebase site (660 metres walking distance from the Tesco site);
- Thornbury Road, Osterley Small Neighbourhood Centre located circa 1.5km walking distance to the west of the Homebase site (1.2km walking distance from the Tesco site); and
- St John's Road (Isleworth) Large Neighbourhood Centre located 1.6km to the south west of the Homebase site (1.9km walking distance from Tesco site).

2.3 The Proposals

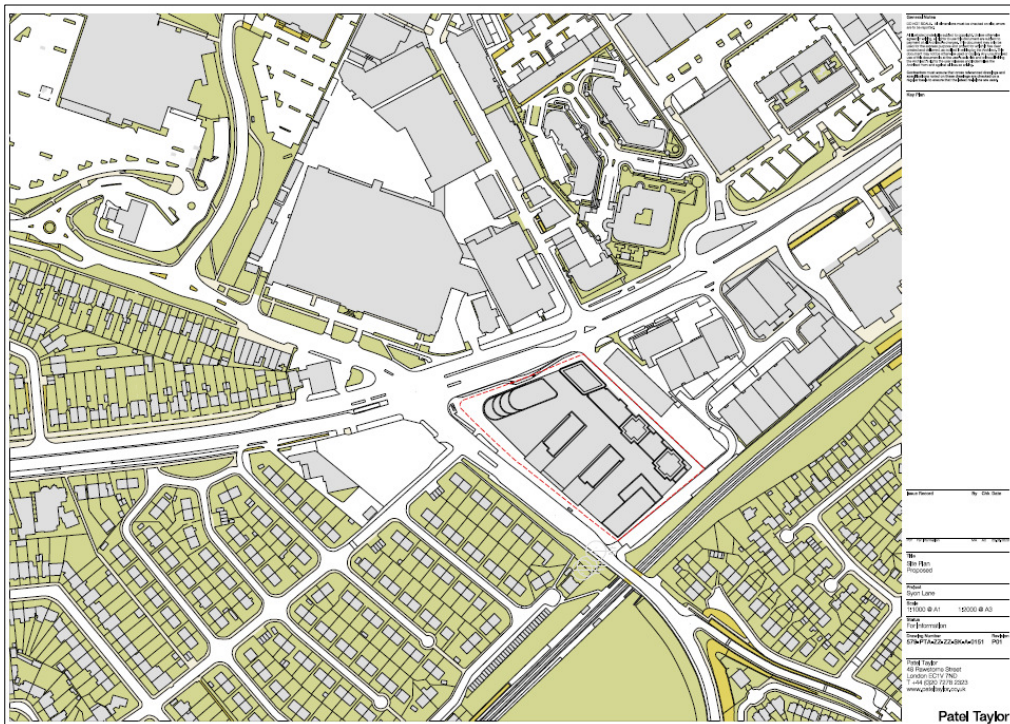
- 2.3.1 The proposals involve the redevelopment of the Homebase Site in parallel with redevelopment proposals for the Tesco Site, to facilitate re-location of the operational Tesco, Osterley store.
- 2.3.2 The proposals provide an unprecedented opportunity to deliver the Council's objectives for residential led redevelopment of both sites, alongside the creation a mixed and inclusive community, a high proportion of quality homes, a new replacement retail use and community facility within a sustainable and liveable location on the Great West Corridor. The proposals represent one of the largest regenerative opportunities in the London Borough of Hounslow with the delivery of over 2,000 new homes.
- 2.3.3 Together the proposals will deliver a very significant contribution of new homes including affordable housing to work towards achieving the Draft London Plan strategic target of 7,500 new homes in the Opportunity Area.

Homebase Store Site

- 2.3.4 The Homebase site proposal involves the redevelopment of the site for a mixed use residential and foodstore development (relocated Tesco store). The existing Homebase store on the site would close and be demolished as a result of the proposed redevelopment. The proposal includes:
- Delivery of 473 high quality homes;
 - 38% affordable housing (on a habitable room basis);
 - A new and modern Tesco retail store of circa 10,550 sqm (GIA);
 - Community space of 200 sqm (GIA);
 - 137 sqm (GIA) of flexible commercial, business and service space;
 - 400 retail car parking spaces;
 - 100 residential car parking spaces;
 - 3 residential visitor car parking spaces and 2 car club spaces;
 - 204 retail cycle parking spaces;
 - 896 residential cycle parking spaces;
 - Building heights include a four-storey podium with blocks ranging up to seventeen storeys;
 - Communal residential amenity space with biodiverse podium gardens including open space and children's play space;
 - New active frontages and improved, safer public realm along Syon Lane and the Great West Road;

- Dedicated new pedestrian and cycle friendly 'clean air' route provided between Syon Lane Station and the Great West Road via Syon Gate Way and new eastern street, Syon Gate Lane.

Figure 2.3: Proposed Site Plan, Homebase Store Site



Tesco Osterley Store Site

2.3.5 The Tesco site proposal involves the redevelopment of the site for a residential led development together with supporting small-scale commercial and community uses at ground floor. The proposal involves the demolition of existing buildings on the site and the provision of:

- Up to 1,677 new homes;
- Between 3,000 sqm and 5,000 sqm of flexible non-residential floorspace comprising commercial, business and service space, and/ or learning and non-residential institution space, and/or local community space, and/or a public house/ drinking establishment, and/or mobility hub;
- Buildings heights ranging from two to 17 storeys;
- A minimum of 20,000 sqm of publicly accessible open space, which includes three new public open spaces;
- A minimum of 8,000 sqm of communal amenity space at podium and roof level;
- A minimum of 5,000 sqm play space split between public ground floor area and communal podium/roof levels;
- Planting of a minimum of 300 new trees;
- Up to 400 car parking spaces, including a minimum of 10 car club bays;

- 20% of car parking spaces to be electric vehicle charging points, with remaining spaces to be passive;
- London Plan compliant cycle parking;
- A new public route through the retained and enhanced Water Gardens;
- A mobility hub and bus welfare facilities; and
- A new bus turning facility for Route E1 and H28 buses.

Figure 2.4: Proposed Site Plan, Tesco Osterley Store Site



2.3.6 The redevelopment of the Tesco store site will follow after Tesco have relocated into their new store on the Homebase store site and the existing Tesco Extra store is closed.

2.4 Existing and Proposed Retail & Commercial Floorspace

2.4.1 The existing and proposed retail, commercial, community floorspace figures are set out in Figure 2.5 below.

Figure 2.5: Existing and Proposed Retail, Commercial & Community Floorspace

	Retail Uses Subject to Impact Test (previously Use Class A1)		Other Main Town Centre Uses subject to Impact Test	Commercial/Community Uses not subject to Impact Test	Total
	Comparison Goods	Convenience Goods	Other Shops (eg Hairdressers & Sandwich Bars) / Restaurants & Cafes / Drinking Establishment/ Takeaway / Gym	Doctors Surgery Community Centre / Hall / Office	
Existing					
Homebase Site, Syon Lane					
Gross	4,180	-	-	-	4,180
Net	3,762	-	-	-	3,762
Tesco site, Syon Lane					
Gross	11,582		-	-	11,582
Net	2,621	3,931	-	-	6,552
Total					
Gross	15,762		-	-	15,762
Net	6,383	3,931	-	-	10,314
Proposed					
Homebase Site, Syon Lane					
Relocated Tesco Store					
Gross	10,550		-	-	10,550
Net	2,303	3,454	-	-	5,757
Other Floorspace					
Gross	54	-	144	200	398
Net	43	-	135	200	378
Tesco site, Syon Lane					
Gross	400	550	1,850	2,200	5,000
Net	320	385	1,480	2,200	4,385
Total					
Gross	11,554		1,994	2,400	15,948
Net	2,666	3,839	1,615	2,400	10,520
Difference					
Gross	-4,208		1,994	2,400	+186
Net	-3,717	-92	1,615	2,400	+206

Notes:

Floorspace figures provided by applicant

Gross floorspace is GIA

Net floorspace of existing Homebase assumed to be 90% of gross

Gross and net floorspace of existing and proposed Tesco store provided by applicant/Tesco

Net floorspace of existing and proposed Tesco store assessed at 60% convenience / 40% comparison

Net floorspace of other comparison goods floorspace assumed to be 80% of gross

Net floorspace of other convenience goods floorspace assumed to be 70% of gross

Net floorspace of proposed 'Other Main Town Centre Uses subject to Impact Test' on Homebase site provided by applicant

Net floorspace of proposed 'Other Main Town Centre Uses subject to Impact Test' on Tesco site assumed to be 80% of gross

Gross/net floorspace of proposed 'Commercial/Community Uses not subject to Impact Test' is the same

Proposed floorspace figures for Tesco site are maximum floorspace figures.

Figures may not add due to rounding

2.4.2 Overall, the proposed development involves a reduction in convenience/comparison retail floorspace of 4,208sq m gross/3,809sq m net.

2.4.3 In terms of other commercial/community uses, whilst the end users have not yet been secured, for the Tesco site, these are likely to include a number of small scale supporting/ancillary uses including a GP, pharmacy, café, florist, hairdresser, a small community hall, pub, offices, and a gym. For the Homebase site this is likely to include a small community centre and a small complementary commercial unit.

Overall, the applications seek planning permission for a maximum of 4,394sq m gross of other town centre uses and commercial/community floorspace which will primarily be located at ground floor level.

2.4.4 When considering the application against the retail/town centre use policy tests, the following are important material considerations which should be taken into account by the Council in the determination of the planning applications:

1. the proposals involve the relocation of a Tesco store to a site just 260 metres from its existing site;
2. the proposed retail/commercial/community provision on the Tesco and Homebase sites is to primarily serve/support the proposed residential units; and
3. overall, the proposals involve no increase in retail floorspace (previously Use Class A1).

3.0 Planning Policy Context

3.1 Introduction

- 3.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise.
- 3.1.2 This section considers the retail/town centre use planning policy context relevant to the proposed developments as set out in the development plan and other policy documents material to the application's determination.
- 3.1.3 The statutory development plan comprises the London Plan (2016) and the Hounslow Local Plan (2015). The National Planning Policy Framework (NPPF), the National Planning Practice Guidance (NPPG), the emerging New London Plan, and the Hounslow Local Plan Reviews are material considerations.
- 3.1.4 The key planning policies of relevance to this statement are summarised below.

3.2 The Development Plan

The London Plan (2016)

- 3.2.1 Policy 4.7 of the London Plan relates to retail and town centre development. Part B of the policy notes that retail, commercial, culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that area, or can be, well integrated with the existing centre and public transport. It also identifies that proposals for new edge or out of centre development should be subject to an assessment of impact.
- 3.2.2 Policy 4.8 identifies that the Mayor will, and boroughs and other stakeholders should, support a successful, competitive and diverse retail sector which promotes sustainable access to goods and services.

Hounslow Local Plan (2015)

- 3.2.3 Policy TC3 of the Hounslow Local Plan seeks to support the Council's regeneration objective by directing growth of retail and other town centre uses to town centres. It sets out that proposals outside the borough's four town centres will be assessed against both the sequential approach and retail impact policy tests.
- 3.2.4 Policy TC3 identifies that impact assessments are required where development of over 500sqm of retail (previously Use Class A1) or 2,500sqm of other main town centre use floorspace is proposed outside of the borough's four town centres.

3.3 Material Considerations

National Planning Policy Framework (NPPF)

Sequential Test

- 3.3.1 The NPPF (paragraphs 86 and 87) sets out that a sequential assessment needs to accompany planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date development plan. Paragraph 86 identifies that main town centres uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- 3.3.2 Paragraph 87 identifies that when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. The NPPF requires applicants and local planning authorities to demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.

Retail Impact

- 3.3.3 The NPPF (paragraph 89) sets out that when assessing application for retail and leisure development outside town centre, which are not in accordance with an up-to-date development plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set threshold (if there is no locally set threshold, the default threshold is 2,500 sqm of gross floorspace).
- 3.3.4 The assessment should include:
- 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
 - 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).
- 3.3.5 The NPPF states at paragraph 90 that where an application is likely to have significant adverse impact on one or more of the considerations as set out above, it should be refused.

National Planning Policy Guidance (NPPG)

Sequential Test

- 3.3.6 The NPPG 'Town Centres and Retail' section was last updated in July 2019. Confirmation of how the sequential test should be used in decision taking is set out in paragraph 11 which notes that wherever possible the LPA should support the applicant in undertaking the sequential test, including sharing any relevant information. The application of the test should be proportionate and appropriate for the given

proposal. A checklist is provided which sets out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:

- With due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered?
- Is there scope for flexibility in the format and/or scale of the proposal?
- If there are no suitable sequentially preferable locations, the sequential test is passed.

3.3.7 Paragraph 12 notes that the use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. It adds that robust justification must be provided where this is the case.

3.3.8 Finally, paragraph 13 provides guidance on how viability should be promoted. It identifies that LPA's need to be realistic and flexible in terms of their expectation as promoting new development on town centre locations can be more expensive and complicated than building elsewhere.

3.3.9 Whilst there is no longer a separate criteria test on viability it is a key consideration when assessing whether a potential sequentially preferable unit/site is suitable.

Impact Test

3.3.10 The NPPG 'Town Centres and Retail' section (paragraph 14), confirms that the impact test relates to retail and leisure developments only (not all main town centre uses).

3.3.11 Paragraph 15 adds that the impact test only applies to proposals exceeding 2,500sq m unless a different locally appropriate threshold is set by the LPA. It also notes that as a guiding principle impact should be assessed on a like-for-like basis in respect of that particular sector. Retail uses tend to compete with their most comparable competitive facilities. It also notes that where wider town centre developments or investments are in progress, it will be appropriate to assess the impact of relevant applications on that investment.

3.3.12 Confirmation of how the impact test should be used in decision taking is set out in paragraphs 17. The guidance states that the impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. It adds that applicants and local planning authorities should seek to agree the scope, key impacts for assessment, and level of detail required in advance of applications being submitted.

3.3.13 Paragraph 18 sets out a checklist for applying the impact test. It also confirms that a judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances. For example, in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.

The Emerging New London Plan (Intend to Publish London Plan, 2019)

- 3.3.14 Policy SD7 reiterates the requirement for the application of the sequential test for proposals outside town centres, focussing on sites within the town centre or where no sites are available, suitable or viable, sites on edge of centres that are well integrated with the existing centre and local walking, cycling and public transport networks. Out of centre sites should only be considered if it is demonstrated that no suitable site are (or are expected to become) available with town centre or edge of centre location.
- 3.3.15 Policy SD7 also requires an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for retail, leisure and office uses that are not in accordance with the Development Plan. Applications that are likely to have a significant adverse impact should be refused.

Hounslow Local Plan Review (Pre-Submission Regulation 19, 2019)

- 3.3.16 The Council have prepared Local Plan reviews for Site Allocations, West of Borough, and Great West Corridor. Regulation 19 consultation was undertaken by the Council between July and September 2019. The Council intend to submit the plan reviews to the Secretary of State in September this year with examination potentially to take place in Winter this year.
- 3.3.17 The West of Borough Local Plan Review does not cover the two application sites so is not considered relevant in this instance.

The Draft Great West Corridor Local Plan Review

- 3.3.18 Policy GWC1 of Great West Corridor Local Plan Review identifies (criterion (g)) that across the Great West Corridor provision of at least 19,800sq m of active ground floor retail (previously use class A1-A4) uses should be provided. Great West Corridor West Policy P1 indicates that of this minimum retail floorspace requirement the great western corridor west area (which the two application sites are located in) should be seeking to deliver a minimum of 9,000sq m of retail ground floor uses.

Hounslow Site Allocations Local Plan Review

- 3.3.19 The existing Tesco site is identified under Site Allocation 2. The allocation acknowledges that the Tesco foodstore could be re-provided elsewhere in the corridor at an equivalent size. In the circumstance where the existing Tesco foodstore is relocated, the allocation supports local retail and commercial provision. It identifies a minimum retail (previously use class A1-A4) floorspace requirement of 780sq m.
- 3.3.20 The Homebase Syon Lane site is covered by Site Allocation 11. In so far as retail and commercial uses are concerned the identified site requirements for the site include a single large format retail unit delivering a minimum quantum of retail floorspace. The minimum retail (previously use class A1-A4) floorspace requirement is identified as 2,750sq m.

3.4 Summary

3.4.1 Both development plan policy, the NPPF and relevant material considerations identify that for town centre use proposals not in a centre and not in accordance with an up to date development plan the following issues should be taken into consideration in assessing their acceptability:

- The sequential approach; and
- An impact assessment.

3.4.2 Since the two application sites are in an out-of-centre location and not allocated for town centre use development, the remaining sections of this statement address the above two policy test requirements.

3.4.3 It should however be noted from the outset that, in so far as retail/town centre use planning matters are concerned, the principle of the relocation of the Tesco store from its existing site is accepted/supported by emerging local plan policy. In the circumstance where the existing Tesco foodstore is relocated, emerging local plan policy also supports "*local retail provision*" on the Tesco site. These are a key important material consideration.

4.0 The Sequential Approach to Site Selection

4.1 Introduction

4.1.1 As noted in Section 3, the NPPF (paragraph 86) identifies that main town centre uses should be located in town centre, then in edge of centre locations, and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. The NPPF requires applicants and local planning authorities to demonstrate flexibility on issues such as format and scale so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.

4.1.2 Confirmation of how the sequential test should be used in decision taking is set out in paragraph 11 of the NPPG 'Town Centres and Retail' section. It notes that the application of the test should be proportionate and appropriate for the given proposal. A checklist is provided which sets out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:

- With due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposed would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre.
- Is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.
- If there are no suitable sequentially preferable locations, the sequential test is passed.

4.2 Methodology

4.2.1 The approach adopted in this sequential site assessment is consistent with the recommendations and guidance set out in the NPPG regarding the sequential approach to site selection.

4.2.2 Given that the nature and role of the retail/town centre floorspace proposed on each site is different (with the proposed relocated Tesco store servicing a reasonably wide catchment and the proposed local retail provision on the Tesco site primarily serving the proposed homes on the Tesco site), two separate sequential approach assessments, based on different site search parameters, has been undertaken.

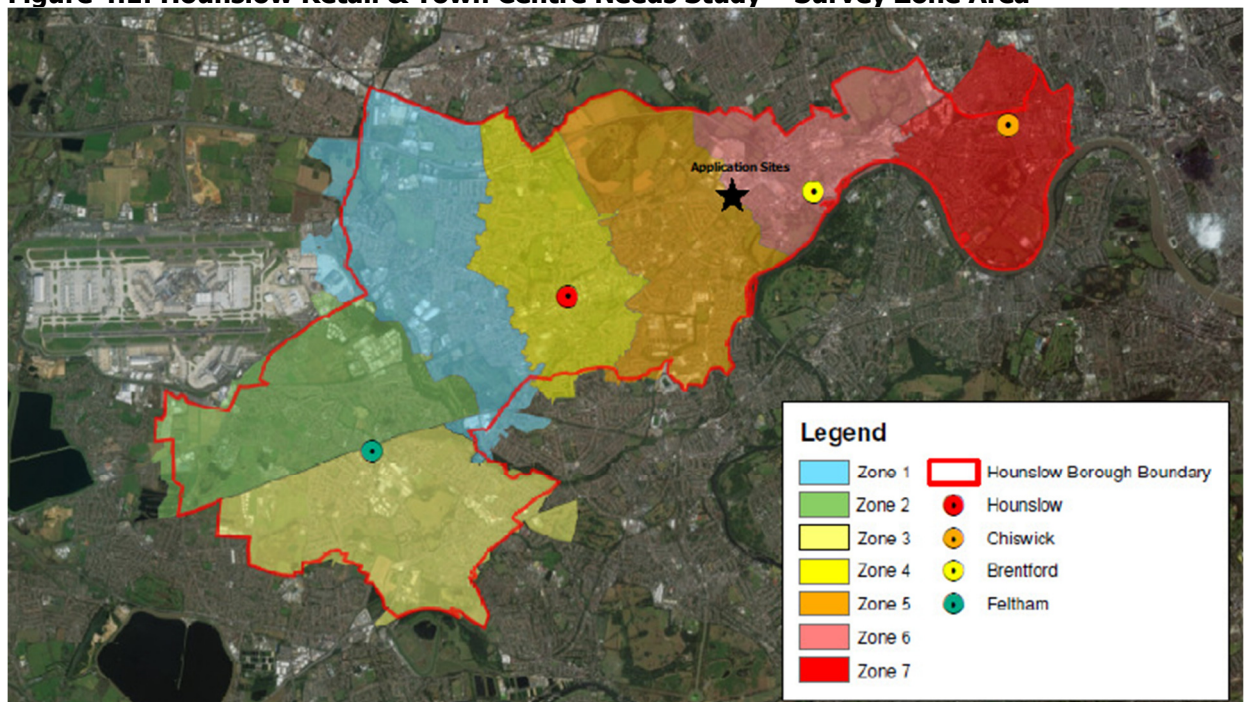
4.3 Sequential Site Analysis - Proposed Relocated Tesco Store, Homebase Site

- 4.3.1 As part of the pre-application retail/town centre use planning statement scoping exercise, in accordance with the NPPG the sequential site search parameters; the level of flexibility required to be demonstrated; site availability timescales; and the sites/units that require assessing as part of this assessment have all been discussed and agreed with planning officers in the Council.
- 4.3.2 Whilst it is also proposed to provide a very limited amount of local retail, commercial and community floorspace on the Homebase site (344sq m gross) this would serve an ancillary and complimentary role to the relocated Tesco store and assist in providing active ground floor uses for the development. Given this, we therefore consider it appropriate and robust to base the site search parameters and assessment primarily on large circa 10,550sq m gross proposed relocated Tesco store.

Site Search Parameters

- 4.3.3 The Hounslow Retail and Town Centre Needs Study (2018) (HRTCNS) broadly identifies the primary catchment area (PCA) of existing main-food convenience facilities in Brentford (namely the existing Tesco foodstore). The study identifies that Survey Zones 4, 5 and 6 broadly represent the PCA of the existing main-food convenience facilities.
- 4.3.4 Figure 4.1 below provides an extract from the HRTCNS and shows the three zones which are considered to represent the PCA and in turn the area of search requirement with regard to potential sequentially preferable sites.

Figure 4.1: Hounslow Retail & Town Centre Needs Study – Survey Zone Area



-
- 4.3.5 Having reviewed the PCA, we assess whether there are any sequentially preferable sites/units in the following centres in the PCA (Zones 4, 5 and 6):
- Brentford Town Centre (1km to east);
 - Hounslow Town Centre (2.5km to the west); and
 - St Johns Road (Isleworth) Large Neighbourhood Centre (1.9km to the south)
- 4.3.6 Whilst Old Isleworth Large Neighbourhood Centre and Heston Large Neighbourhood Centre are located within the PCA both centres are located towards the periphery of the PCA. A relocated Tesco store within one of these centres would not serve the same catchment as the existing or proposed relocated Tesco site. We therefore do not consider it necessary to assess these neighbourhood centres.
- 4.3.7 Given the level of retail and commercial floorspace proposed on the Homebase site and the role of the smaller neighbourhood centres in the Borough we also do not consider it appropriate to assess smaller neighbourhood centres. This approach is in accordance with Adopted Local Plan Policy TC3(g) which identifies that small neighbourhood centres should be considered for *"smaller proposals that are suitable to the proportions of the centre"*.
- 4.3.8 At the request of, and in agreement with, the Council, whilst located circa 3.5km to the north of the application site, outside the PCA and within Ealing Borough, this assessment also reviews whether there are potential sequentially preferable sites/units in or on the edge of Hanwell District Centre. It is however important to note from the outset that a relocated Tesco store in Hanwell Town Centre would not serve the same catchment as the existing or proposed relocated Tesco store. Residents in Hounslow Borough, most notably in Brentford, would be disadvantaged if the Tesco store was relocated to Hanwell.

Flexibility of Format and/or Scale

- 4.3.9 The NPPF and NPPG indicate that when looking at the suitability of potential sequential sites, flexibility should be demonstrated on issues such as format and scale.
- 4.3.10 The definition of suitability is pertinent to the consideration of flexibility of format and scale. The definition has been clarified in February 2012 by the Supreme Court in Tesco Stores v Dundee City Council. Since this time the Judgment has been recognised and applied by the High Court, Secretary of State and Inspectors as being applicable to the NPPF. The Dundee Judgment identifies that provided the applicant has demonstrated flexibility with regard to format and scale, the question is whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit the alternative site. (Paragraph 29).
- 4.3.11 The requirement to disaggregate a planning application proposal has been clarified by Court of Appeal judgements and a number of SoS call-in decisions:

- Warners Retail Court of Appeal judgement¹
- SoS call-in decision at Rushden Lakes, Northamptonshire²;
- SoS call-in decision at Scotch Corner, North Yorkshire³; and
- SoS Call in decision at Cribbs Causeway⁴, Bristol.

4.3.12 On this specific matter and of relevance in the current case, the Inspector commented in the Cribbs Causeway in his conclusions:

"In the Tollgate Village case the Inspector did consider that there was scope for disaggregating the proposals and spreading them onto different sites, even though ultimately such sites were found not to be available. However, the findings here were case specific and it is noted that they were not specifically endorsed by the Secretary of State in his decision. As a general principle an approach that involves disaggregation does not seem to me to fit well with the Aldergate Properties or Warners Retail judgements referred to above. The town centre uses in the application proposal would comprise the retail and leisure uses and to divide them up would change the broad nature of the development in this case."

APP/P0119/V/17/3170627, Paragraph 568, IR

- 4.3.13 The Rushden Lakes Secretary of State decision and the Mall decision confirms that the sequential test relates entirely to the application proposal as a whole; it is not a question of whether a materially reduced or otherwise different scheme can in theory be pursued on other sites. Provided that an element of flexibility is exercised on issues such as format and scale, any potential sequential sites should be considered only in terms of whether they could accommodate a broadly similar development proposal.
- 4.3.14 The Rushden Lakes Secretary of State decision and the Mall decision confirms that the sequential test relates entirely to the application proposal as a whole; it is not a question of whether a materially reduced or otherwise different scheme can in theory be pursued on other sites. Provided that an element of flexibility is exercised on issues such as format and scale, any potential sequential sites should be considered only in terms of whether they could accommodate a broadly similar development proposal. In this case a relocated foodstore of broadly 10,550sq m gross floorspace with sufficient car parking (approx. 400 spaces) and adequate servicing arrangements.
- 4.3.15 Accordingly, WYG will review the sequential approach to establish whether other site opportunities are available or suitable to support the applicant's development which would require a site of at least 1.5ha. Any site smaller than 1.5ha would not be able to meet car parking requirements/standards, adequate servicing arrangements, and sufficient/adequate foodstore floorspace on a single footprint.

¹ Warners Retail (Moreton) Ltd v Cotswold District Council & Or, Court of Appeal – Civil Division [2016] EWCA Civ 606

² Appeal reference: APP/G2815/V/12/2190174

³ Appeal reference: APP/V2723/V/3132873 & APP/V2723/V/16/3143678

⁴ Appeal reference: APP/P0119/V/17/3170627

4.3.16 In this instance, when considering what is a reasonable in terms of demonstrating flexibility in format and scale of the proposed development, it is important to take into account the fact the proposal involves a relocated foodstore. The relocated Tesco store would be smaller than their existing store (-1,082sq m gross) and it is proposed on a reduced sized site (-2.8ha (from 4.3ha to 1.5ha). It also involves a store on multiple levels (with undercroft/basement parking). This itself demonstrates significant flexibility in format and scale and is an important material consideration when considering the sequential approach test.

4.3.17 Notwithstanding, and without prejudice to the position set out above, in order to demonstrate flexibility, we have reduced the minimum site area requirements by a further 20% (1.2ha) to establish whether other site opportunities are available or suitable to support the applicant's development.

Availability

4.3.18 In accordance with the NPPF (paragraph 86), any sequentially preferable site/unit needs to be available or expected to become available within a reasonable period. Any alternative potential sequentially preferable site/unit should be available on approximately the same timescale as the subject planning application. If there is any uncertainty with regard to the availability of a site it cannot be considered to be available.

4.3.19 Subject to grant of planning permission, the redevelopment works at the Homebase site are anticipated to start later in Summer 2021 with Tesco anticipated to relocate and be trading by Autumn 2025. Accordingly, for a potential alternative site to be considered available in the context of the subject proposals it should be available in a time frame that could allow a scheme to be open for trading by 2024.

Proposed Sites/Units to be Assessed

4.3.20 In accordance with guidance set out in the NPPF and NPPG, the applicant has undertaken a comprehensive sequential site analysis of potential in-centre and edge-of-centre locations in Brentford and Hounslow town centres, Hanwell District Centre, and Isleworth Large Neighbourhood Centre. This process has included:

- a review of the Council's latest retail, leisure, and town centre study;
- an analysis of adopted and emerging development plan policy documents;
- a review of potential town centre and edge-of-centre sites/units in the centres; and
- discussions with planning officers in the Council.

4.3.21 The above exercise has resulted in the identification of the following sites/units:

- Brentford Waterside Redevelopment site;
- Hounslow High Street Quarter Redevelopment site; and
- Vacant units in Brentford Town Centre, Hounslow Town Centre, Hanwell District Centre, and St Johns Road (Isleworth) Large Neighbourhood Centre.

4.3.22 We are not aware of any other sites or units that need to be considered as part of this sequential approach assessment. Planning officers have also confirmed in their response to the pre-application scoping exercise that they are also not aware of any other sites over and above those identified above that would need to be considered.

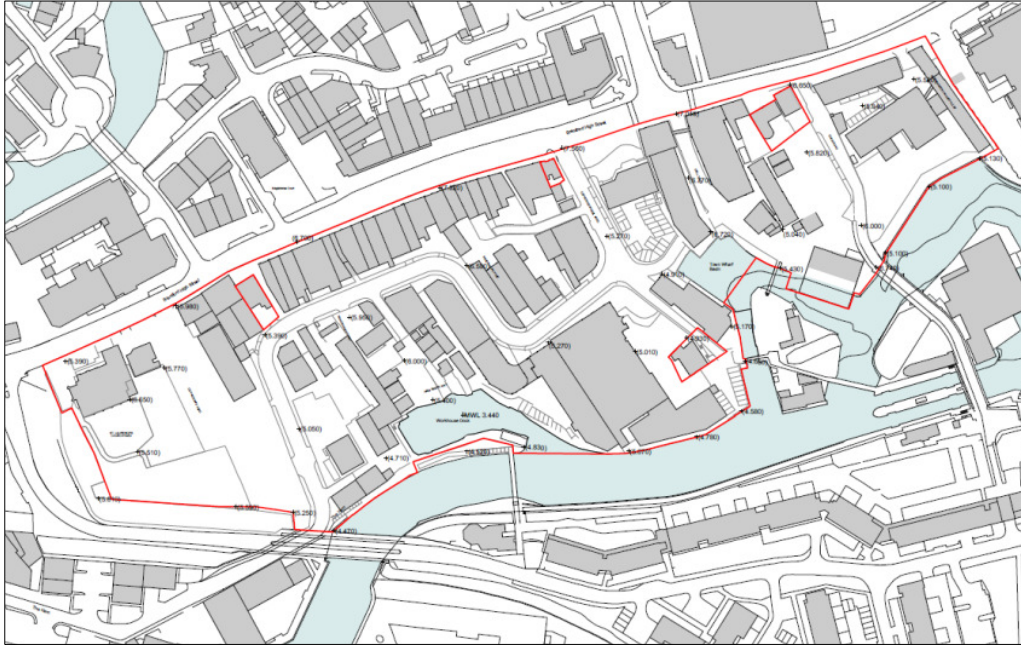
4.3.23 We are also not aware of any further sites/units that would need to be considered following the changes to the Use Class Order (which came into force on 1 September 2020) and the greater flexibility in planning terms.

Sequential Site Analysis

Brentford Waterside Redevelopment Site

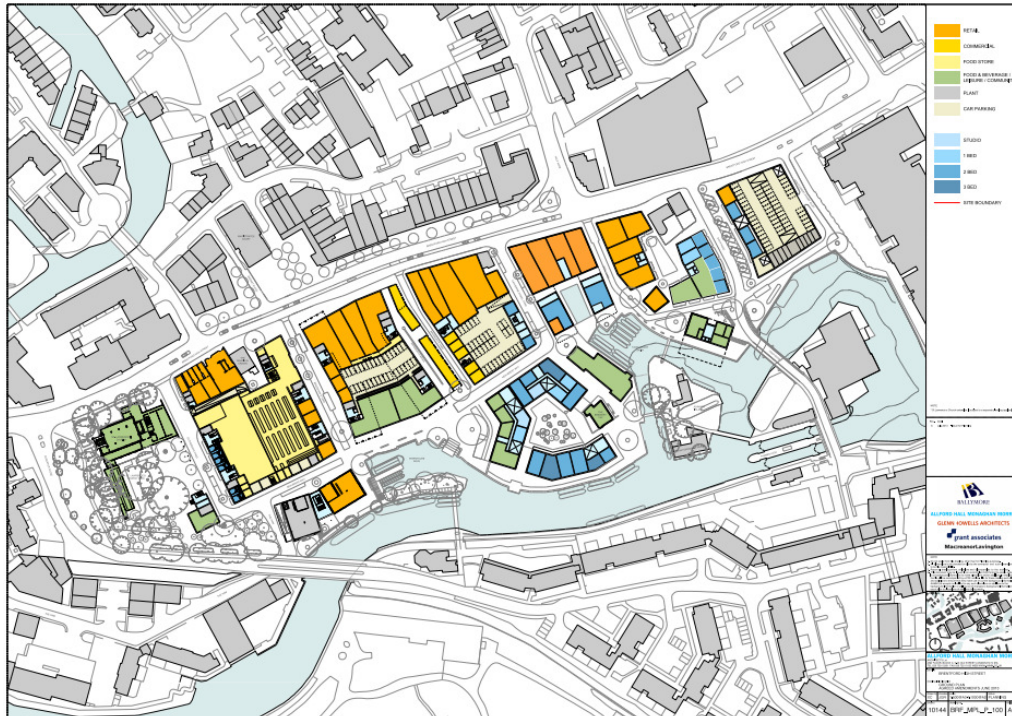
4.3.24 The site, comprising an area of 4.79ha, is located between the High Street and the Grand Union Canal. It is allocated in the Local Plan (Allocation 17) for mixed use development comprising of residential, retail, leisure, cultural, community and water space related uses together with provision for town centre car parking. It is also located partly within the Local Plan defined Primary Shopping Area (comprising some Primary Shopping Frontage) and is wholly within the defined 'Town Centre' boundary. The site is therefore defined as a town centre location in town centre planning policy terms.

Figure 4.2: Brentford Waterside Redevelopment Site -Site Location Plan



- 4.3.25 Planning permission was granted in April 2015 for its comprehensive redevelopment involving a mixed-use residential and commercial led redevelopment of the site (LPA ref. 00607/BA/P2). The hybrid planning permission (part detail part outline) involves the demolition of existing buildings and the retention of a number of buildings as part of a comprehensive mixed use development comprising a maximum of 111,821sq m gross floorspace including a maximum of 876 residential units along with associated works. The proposed development includes retail (14,133sq m gross (previously use class A1), residential (C3 use), business (previously use class B1) and leisure (previously use class D1/D2) and associated uses as part of the development including car parking, cycle storage, and an energy centre.
- 4.3.26 Full planning permission was granted for Phase 1 of the development (Blocks B, C and K (western part of site)), which comprises of 323 residential units, a foodstore and small retail units (7,051sq m gross) and B1 floorspace (362sq m gross), as well as a basement car park, additional parking, an energy centre and associated landscaping and works. Outline planning permission has been granted for the remainder of the development. Figure 4.3 below sets out the proposed ground floor plan of the redevelopment scheme.

Figure 4.3: Brentford Waterside Redevelopment Scheme - Proposed Ground Floor Plan



- 4.3.27 Since the original grant of planning permission in 2015, a number of planning conditions have been discharged by the applicant, the planning permission has been subject to a number of non-material amendments, and a CPO inquiry has taken place. The planning permission is now being implemented by Ballymore Group with demolition/ building work having commenced.
- 4.3.28 Phase 1 is intended to include the new foodstore (identified in yellow in Figure 4.3) with a proposed floorspace of circa 2,800sq m gross, together with a number of small retail units primarily facing onto the High Street.
- 4.3.29 The size of the proposed foodstore on this site (2,800sq m gross) is around a quarter of the size of the proposed relocated Tesco store (10,550sq m gross). Requiring the applicant/Tesco to reduce the relocated store size by this amount goes far beyond what is considered to be reasonable in terms of demonstrating flexibility in format and scale. Accordingly, it is considered that the Brentford Waterside redevelopment scheme is not suitable for the proposed development.

Hounslow High Street Quarter Redevelopment Site

- 4.3.30 This site comprises an area of 2.5ha and is bound by Prince Regent Road to the north, the Royal Mail Sorting Office to the east, residential and commercial properties to the west side of Alexandra Road and the rear of properties fronting High Street to the south.
- 4.3.31 The site was formally known as Key Site 1 as part of the original Hounslow Town Centre Masterplans dating from the 1990s. Key Site 1 also included the land to the north, where the Blenheim Centre (Phase 1) is now located. Phase 2, the subject site, was never built out/implemented.

4.3.32 The site is allocated within the Local Plan (Allocation 37) for mixed use development comprising 'Mixed Use Leisure, retail and residential with public car parking'. It is also located within the defined Primary Shopping Area and Town Centre Boundary and is therefore defined as a town centre location in retail and 'other main town centre uses' planning policy terms.

Figure 4.4: Hounslow High Street Quarter Redevelopment Site -Site Location Plan



4.3.33 Planning Permission was granted in February 2016 (00616/F/P19) for the comprehensive redevelopment of the site for a mixed-use development 527 residential units, a multiscreen cinema of 5,267 sqm (GEA), 9,830 sqm (GEA) of retail, restaurant and café uses (previously Use Classes A1- A5), car parking, and public realm.

4.3.34 A number of amendments (both non-material and material) to the original planning permission have since been approved by the Council. The latest one was approved in September 2019. Planning permission was granted for minor material amendment to allow, *inter alia*, for 60 additional residential units (to provide a new total of 588), a decrease in retail, restaurant and café floorspace by 2,302sq m (to 8,897sq m gross), and the introduction of 1,214sq m gross office floorspace. Figure 4.5 below shows the proposed ground floor layout of the application proposals.

Figure 4.5: Hounslow High Street Quarter Redevelopment - Proposed Ground Floor



- 4.3.35 Barratt London & Wilson Bowden Developments began construction work on site in December 2017. Significant progress has been made and we understand (from press releases) that the first home completions are due to take place in late 2020/early 2021 and that the cinema (to be operated by Cineworld) and retail units are due to open in 2021.
- 4.3.36 The 8,897sq m gross retail (previously Use Classes A1- A5) floorspace of the approved development is spread across 20 units within 4 separate development blocks (Blocks A-D). A number of the units will provide supporting food and drink uses which will complement and trade alongside the multiplex cinema.
- 4.3.37 Notwithstanding whether the units are available, or available within a reasonable period, the unit and block configuration of the currently being built retail floorspace result in the floorspace not being suitable for the proposed development which involves a relocated Tesco foodstore of circa 10,550sq m gross within a single unit. Furthermore, the delivery of a large relocated Tesco foodstore would not only conflict with the policy aspirations of the site, which is for a mixed retail and leisure scheme, it would also duplicate what was delivered in Phase 1 (a large Asda foodstore), and would fail to deliver a diverse range of uses which Hounslow Town Centre requires.
- 4.3.38 Accordingly, the site is therefore considered to be unsuitable for the proposed development.

Re-Use of Existing Vacant Premises in Centres within the PCA

- 4.3.39 In addition to an assessment of the above sites, this assessment also considers vacant premises/units within the defined centres in the PCA. This process involved land use surveys of the centres to identify and assess existing vacant units on an individual basis.
- 4.3.40 Only vacant units which could accommodate the proposed development (a large circa 10,550sq m gross relocated foodstore) after adopting a degree of flexibility, could meet the identified need for the development.
- 4.3.41 Figure 4.6 below illustrates the size of range of vacant units within the centres in the PCA. The location of the vacant units in Brentford Town Centre, Hounslow Town Centre and Hanwell District Centre are shown on the Experian Goad land use plans included at **Appendix B**.

Figure 4.6: Size of Existing Vacant Premises in Centres within the PCA

Size (sq m gross)	No. of Units			
	Brentford Town Centre	Hounslow Town Centre	Hanwell District Centre	St Johns Rd Large Neighbourhood Centre
<100	1	2	11	2
101-200	3	9	1	-
201-300	-	3	2	-
301-600	-	3	-	-
601-1,000	-	1	-	-
1,001-1,900	-	-	-	-
Total - Units	4	19	14	2
Total - Floorspace	680sq m	4,190sq m	1,210sq m	<200sq m

Source: Experian Goad surveys updated by WYG Planning, June 2020
St Johns Road Large Neighbourhood Centre based on WYG Planning survey, June 2020

- 4.3.42 Our June 2020 survey of Brentford Town Centre shows, excluding those units that are currently lying vacant within the Waterside Redevelopment area, there are only 4 vacant retail/commercial units within the town centre providing a total of just 680sq m gross floorspace. All 4 units measure less than 200sq m gross which are clearly too small to accommodate the proposed development.
- 4.3.43 In Hounslow Town Centre there are currently 19 vacant units. All the units measure less than 700sq m gross. The largest vacant unit is at 1-3 Bath Road (650sq m gross) which was previously occupied by Yates. There are proposals to demolish the public house and develop the site for "sharing living accommodation". A planning application (ref: P/2019/3140) is currently awaiting determination by the Council. The total combined floorspace of the 19 vacant units is 4,190sq m gross which is significantly smaller than the proposed relocated Tesco store, even after adopting flexibility.
- 4.3.44 In addition to the vacant units in Hounslow it is also noted that there is a vacant site on Bell Road (formerly 9-21 Bell Road). This site is vacant pending its redevelopment for residential use (127 units) together with 1,127sq m gross ground floorspace commercial floorspace (ref: P/2015/2397). We

understand that construction works are due to commence later this year. Accordingly, notwithstanding that the permitted commercial floorspace is too small to accommodate the proposed relocated Tesco development, even after adopting flexibility, the site is no longer available for development.

- 4.3.45 There are currently 14 units vacant un Hanwell District Centre. All the vacant units are small in size, measuring less then 300sq m gross, which again are too small to accommodate the proposed development.
- 4.3.46 Finally, turning to St Johns Road Large Neighbourhood Centre, the centre provides just 2 vacant units, both of which are very small in size (<100sq m gross).
- 4.3.47 Accordingly, having regard to our analysis of each centre in the PCA, it is clear, owing to the limited size of the units in the centres there are no units that could physically accommodate the proposed relocated foodstore development.

4.4 Sequential Site Analysis – Local Retail, Commercial & Community Provision, Tesco Site

Site Search Parameters

- 4.4.1 As noted in Section 3, the NPPG 'Town Centres and Retail' section (paragraph 12) identifies that the use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. It is therefore important to note from the outset that the purpose of the proposed ground floor retail and community use floorspace is primarily to support the proposed (up to) 1,677 residential homes. An indicative breakdown of the potential retail, commercial and community uses is provided in Figure 4.7 below.

Figure 4.7: Potential Indicative Breakdown of Proposed Retail/Commercial/Community Use on the Tesco Site

	Gross Floorspace (sq m)	Net Floorspace (sq m)
Convenience/Comparison Retail Uses (previously Use Class A1) subject to Impact Test		
<i>Comparison</i>		
Florist	54	41
Pharmacy	126	101
<i>Sub-total A1 Comparison</i>	<i>177</i>	<i>142</i>
<i>Convenience</i>		
Local Convenience Store	485	240
Sub-total	662	481
Other Main Town Centre Uses subject to Local Plan Policy TC3 Impact Test		
Hairdressers*	80	64
Gastro Pub	408	326
Cafe	101	81
Gym	745	596
Sub-total	1,334	1,067
Commercial/Community Uses not subject to Local Plan Policy TC3 Impact Test		
GP	163	163
Office	1,717	1,717
Hall	281	281
Sub-total	2,161	2,161
Total	4,157	3,709

Notes:

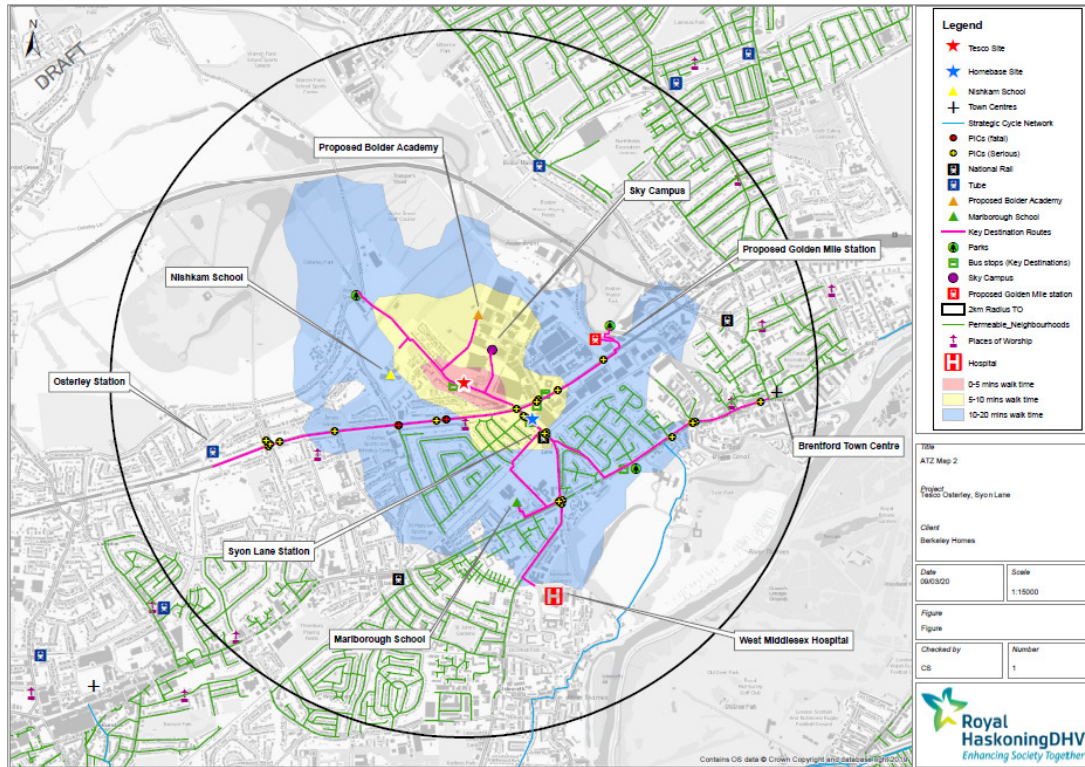
Breakdown of uses is indicative only.

*Technically hairdressers should be included under retail (previously use class A1) uses but for ease of comparison with Figure 2.5 have been included in 'Other Main Town Centre Uses subject to Local Plan Policy TC3 Impact Test'.

The floorspace figures set out in Figure 2.5 are higher because they are maximum (up to) floorspace figures to allow flexibility (given that no end users are secured yet).

- 4.4.2 The retail, commercial and community use floorspace would not come forward without the proposed homes. Accordingly, given the nature/role of the proposed floorspace, in this instance the floorspace is site specific to the application site. This has already been recognised by the Council in allocating the site in the emerging local plan (Local Plan Review) for residential use supported by 'local retail provision and community uses'.
- 4.4.3 Notwithstanding the above, for robustness we have reviewed whether there are any sequentially preferable sites/units in the surrounding defined centres within a 10-minute walking distance radius from the application site. The 10-minute walking distance radius reflects what is defined as the preferred maximum walking distance to 'town centres' from the Institute of Highway Engineers (IHT's) 'Providing for Journeys on Foot' document. The 10-minute walking distance (and 5 and 20-minute walking distance) radius from the Tesco site is shown in Figure 4.8 below.

Figure 4.8: Plan showing 10-minute walking catchment from the Tesco Site



4.4.4 Having reviewed the location of defined centres identified in the Hounslow Local Plan, it is evident that there are no defined centres that fall within the 10-minute walking catchment area from the Tesco site. Accordingly, there are no centres that are capable of providing 'local retail and community services' for the proposed (up to) 1,677 homes.

4.4.5 Notwithstanding and without prejudice to our position set out above, in order to provide a robust assessment, we consider centres within the 20-minute walking catchment from the Tesco site.

4.4.6 The only centre that falls within the 20-minute walking catchment is Spur Road/London Road Small Neighbourhood Centre, which is located to the south-east of the Tesco site. We therefore consider potential sequentially preferable units/sites within and on the edge of Spur Road/London Road Small Neighbourhood Centre.

Flexibility of Format and/or Scale

4.4.7 In accordance with the previously mentioned Rushden Lakes Secretary of State decision and the Mall decision, WYG will review the sequential approach to establish whether other site/unit opportunities are available or suitable to support the applicant's development, up to 5,000sq m gross of mixed retail/commercial/community floorspace at ground floor level.

4.4.8 In order to demonstrate flexibility, we have reviewed whether sites/units are able to accommodate retail/commercial and community floorspace of between 4,500 to 5,500sq m gross.

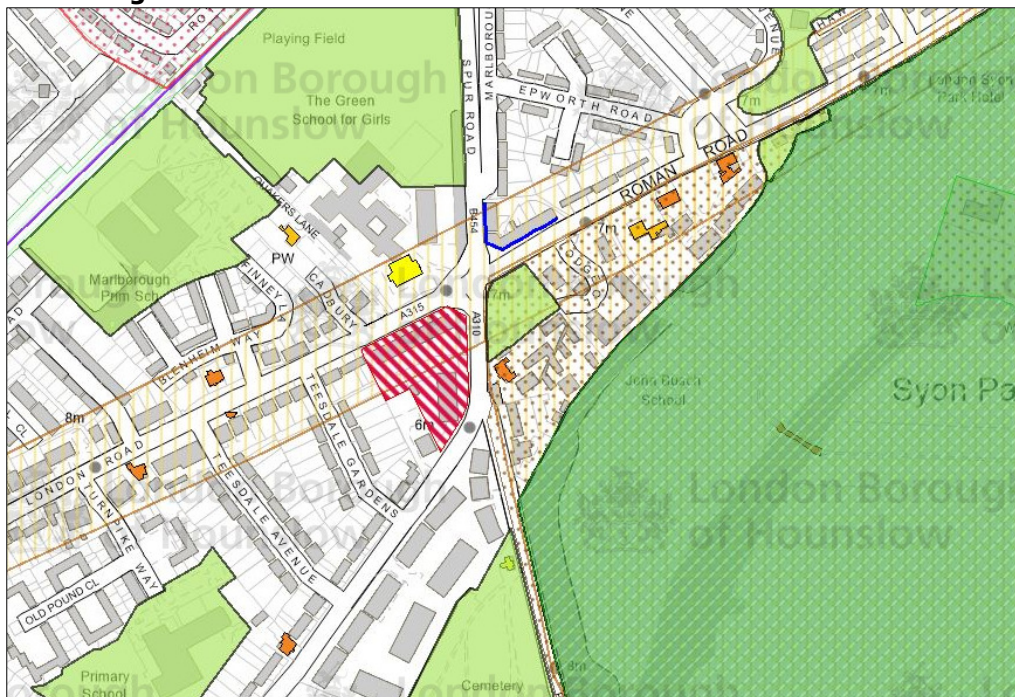
Availability

- 4.4.9 As noted earlier in this section, in accordance with the NPPF (paragraph 86), any alternative potentially sequentially preferable site/unit should be available in approximately the same timescale as the subject planning application. If there is any uncertainty about the availability of a site/unit it cannot be considered to be available.
- 4.4.10 The redevelopment of the Tesco site will only start once Tesco have relocated to their potential new store on the Homebase site and the existing store is closed. Subject to the grant of planning permission, the redevelopment of the Tesco site is anticipated to start on site once the Tesco on the Homebase site has opened, i.e. 2025. The retail/commercial/community units would be delivered within the first phase of development.
- 4.4.11 Accordingly, for a potential alternative site to be considered available in the context of the subject proposals it should be available in a time frame that could allow a retailer/commercial/community occupier to be open by 2025.

Sequential Site Analysis

- 4.4.12 Spur Road/London Road Small Neighbourhood Centre provides a total of 12 retail and service units. The centre is located on the north eastern corner of the Spur Road/London Road/Roman Road junction. The centre is a compact. Residential properties located at each end of the centre restrict opportunities for the extension/expansion of the centre.

Figure 4.8: Hounslow Local Plan Proposals Map Extract showing Spur Road/London Road Small Neighbourhood Centre



Notes:

Extent of neighbourhood centre shown as blue line

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- 4.4.13 At the time of our survey (June 2020) there appeared to be only one vacant unit in the centre (7-9 Spur Road). However, on further review of the unit/address on both Royal Mail and Google websites we understand that the unit is occupied by Drop & Wash dry cleaners. It appears that the shop frontage shutter was just down at the time of our survey.
- 4.4.14 Accordingly, there are no vacant units in the centre that are required to be considered as part of the sequential approach to site selection.

4.5 Conclusions Regarding the Sequential Approach

- 4.5.1 The foregoing analysis demonstrates that there are no suitable or available sequentially preferable sites or units in Brentford Town Centre, Hounslow Town Centre, Hanwell District Centre, and St Johns Road Large Neighbourhood Centre for the proposed relocated Tesco store.
- 4.5.2 The sequential approach analysis also demonstrates that there are no suitable or available sequentially preferable sites or units in relevant centres in the PCA for the local retail, commercial and community provision proposed on the Tesco site.
- 4.5.3 Overall, it is therefore concluded that the proposed development passes the sequential test requirements set out in the development plan (Local Plan Policy TC3 and Policies 4.7 & 4.8 of the London Plan) and paragraph 86 of the NPPF. Given that the proposal fulfils the requirements of the sequent test, the development is appropriate out of centre development which does not cause any harm to the objectives of the London Plan (Policy 4.7).

5.0 Retail Impact

5.1 Introduction

- 5.1.1 The Tesco and Homebase schemes are the subject of separate planning applications, and both applications are accompanied by separate environmental statements. It is, however, a factual reality that the schemes are interdependent. The new Tesco store opening on the existing Homebase site, and the demolition of the existing Tesco store to make way for new residential development are dependent on the other respective development proceeding. Accordingly, and in accordance with Policy TC3 the cumulative impact of both developments has been considered.
- 5.1.2 As noted in Section 3, paragraph 89 of the NPPF identifies that planning applications not located in a centre and not in accordance with an up to date development plan should be assessed in terms of the following impacts on centres:
- 1) The impact of the proposal on existing, committed and planned public and private investment in a centre of centres in the catchment area of the proposal; and
 - 2) The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area.
- 5.1.3 The NPPF advises that planning permission should only be refused where it is likely to have a significant adverse impact on one or more of the above factors. As noted in Section 1, even in the event this presumption of refusal is triggered, this presumption is just one consideration which must be weighed against all other factors to establish whether or not the presumption is outweighed.
- 5.1.4 The NPPF sets out that when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. If there is no locally set threshold, the default threshold is 2,500 sqm of gross floorspace. (paragraph 89). The NPPG, 'Town Centres and Retail' section (paragraph 15), adds that the impact test only applies to proposals exceeding 2,500 square metres gross of floorspace unless a different locally appropriate threshold is set by the local planning authority.
- 5.1.5 Hounslow's 'local set floorspace threshold' is set out in Policy TC3 of the adopted Hounslow Local Plan. The policy requires an individual or a cumulative impact assessment where development proposals outside of the borough's four main town centres involve:
- over 500sqm gross floorspace of retail (previously Use Class A1); or
 - 2,500sqm gross floorspace of other main town centre use floorspace.

5.1.6 Figure 5.1 below summarises the existing and proposed gross floorspace details for retail uses subject to Policy TC3 impact test and other main town centre uses subject to Policy TC3 impact test. For ease of reference, existing and proposed commercial and community floorspace that are not subject to Policy TC3 impact test are also set out in Figure 5.1.

5.1.7 It is important to note that there would not be two Tesco stores open for trading at the same time on the Homebase and Tesco sites. Planning obligations are proposed to control this scenario and prevent this from taking place. An obligation binding the existing Tesco site is proposed to restrict demolition of the existing Tesco store until trading commences at the replacement Tesco store. Further, an obligation binding the existing Homebase site is proposed to restrict the new store from commencing trading until trading has ceased at the existing Tesco store.

Figure 5.1: Existing and Proposed Retail, Commercial & Community Floorspace (sq m gross)

	Retail Uses (previously Use Class A1) Subject to Policy TC3 Impact Test	Other Main Town Centre Uses subject to Policy TC3 Impact Test	Commercial / Community Uses not subject to Policy TC3 Impact Test
	Convenience & Comparison Goods	Other Shops / Restaurants & Cafes / Drinking Establishment/ Takeaway / Gym	Doctors Surgery / Hall / Office
Existing			
Homebase site	4,180	-	-
Tesco site	11,582	-	-
Total	15,762		
Proposed			
Homebase site	10,604	144	200
Tesco site	950	1,850	2,200
Total	11,554	1,994	2,400
Difference (+/-)			
Gross	-4,208	1,994	2,400

5.1.8 Figure 5.1 shows that the proposals actually involve a significant reduction in retail (previously Use Class A1) floorspace (-4,208sq m gross). This is primarily due to the proposal involving the downsizing of the Tesco store by circa 1,000sq m gross and also the demolition of the Homebase store (4,180sq m gross).

5.1.9 Accordingly, in so far as retail floorspace is concerned, the locally set Policy TC1 threshold (500sq m gross) whereby an impact assessment is required is not exceeded and therefore there is no requirements to undertake a cumulative impact assessment of the retail (previously use class A1) floorspace.

5.1.10 Turning to 'other main town centre uses' subject to the impact test, as set out in Figure 5.1, collectively the two planning applications involve a maximum of 1,994sq m gross floorspace. This level of 'other main town centre use' floorspace, which also includes a limited amount of other previously use class A1 floorspace (eg, hairdresser and sandwich bar), also falls below the locally set Policy TC3 threshold (2,500sq m gross).

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- 5.1.11 Accordingly, there is also no requirement to undertake a cumulative impact assessment for 'other main town centre uses'.
- 5.1.12 Notwithstanding, and without prejudice to the clear position that a cumulative impact assessment is not required, and therefore no significant adverse impacts should arise, in order to provide a robust assessment, in the remainder of this section we undertake a qualitative cumulative impact assessment of the proposed retail and other town centre uses (subject to the impact test) on the two sites together with a 'high level' quantitative impact assessment of the proposed small scale local retail (previously use class A1) floorspace.
- 5.1.13 As part of the Scoping stage, it has been agreed with planning officers that a detailed quantitative impact assessment would not be proportionate, necessary or appropriate in this instance because the impact thresholds are not exceeded, and the proposals involve:
- a relocation of an existing foodstore to a site just 260 metres from its existing site (with the relocated store being smaller in size);
 - limited local retail and community floorspace which is intended to primarily support the proposed new homes; and
 - no gross or net increase in retail floorspace.

5.2 Methodology

- 5.2.1 The approach adopted in this impact assessment is consistent with the recommendations and guidance set out in the NPPG regarding the sequential approach to site selection.
- 5.2.2 As advised by the NPPG, 'Town Centres and Retail' section (paragraph 17), we have agreed the scope, key impacts for assessment, and level of detail required with the Council as part of the Scoping Exercise. As noted previously, a copy of the agreed Scoping Note is provided at **Appendix A**.
- 5.2.3 In accordance with the NPPG, 'Town Centres and Retail' section (paragraph 17) the impact assessment has been undertaken in a proportionate and locally appropriate way, drawing on existing information within the Council's Retail & Town Centre Needs Study Update, 2018 (RTCNS) supplemented by our own fieldwork undertaken in June 2020.
- 5.2.4 In agreement with planning officers in the Council this assessment considers the potential impact arising from the proposals on the following centres:
- Brentford Town Centre (circa 1km to east);
 - Hounslow Town Centre (circa 2.5km to the west);
 - St Johns Road (Isleworth) Large Neighbourhood Centre (circa 1.9km to the south);

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- Spur Road/London Road Small Neighbourhood Centre (circa 600 metres to the south-east); and
 - Thornbury Road Small Neighbourhood Centre (circa 1.5km to the west).

5.2.5 Given the distance, limited trading overlap, and role of other neighbourhood centres located further away from the application site, in accordance with the NPPG's guidance to undertake a proportionate assessment, we do not consider it necessary to assess these neighbourhood centres as part of this impact assessment.

5.2.6 However, whilst located circa 3.5km to the north, and outside the relocated Tesco stores PCA, it has been requested by, and agreed with, the Council, that our assessment also considers the potential impact of the proposed development on Hanwell District Centre (within Ealing Borough).

5.2.7 It is important to note from the outset that alongside the fact that an impact assessment is not required, the existing situation on both application sites represents an important material consideration when considering the impact of the proposals. The Tesco store is already trading alongside existing retailers in defined centres and whilst Homebase will close, the relevant planning permission for the store allows unrestricted non-food/comparison retail goods to be sold from the store and therefore could potentially be accommodated by a clothing and footwear retailer.

5.3 Impact on Existing, Committed and Planned Investment

5.3.1 Paragraph 17 of the NPPG 'Town Centres and Retail' section notes that where wider town centre developments or investments are in progress it will be appropriate to assess the impact of relevant applications on that investment. Key considerations will include:

- The policy status of the investment (i.e. whether it is outlined in the Development Plan).
- The progress made towards securing the investment (for example if contracts are established).
- The extent to which an application is likely to undermine planned development or investments based on the effect on current/forecast turnovers, operator demand and investor confidence.

5.3.2 In reviewing whether there is any public or private investment planned in the 6 centres identified above we have had regard to planning policy and site allocations in the adopted and emerging development plan and discussions with planning officers.

Brentford Town Centre

5.3.3 As part of the Scoping Exercise one in-centre investment scheme has been identified within Brentford Town Centre: Brentford Waterside. Planning officers have confirmed that they are not aware of any other in-centre investment in Brentford Town Centre that would need to be taken into account in this assessment.

Brentford Waterside

The Policy Status of the Site

- 5.3.4 As noted in Section 4, the Brentford Waterside redevelopment site allocated in the Local Plan (Allocation 17) for mixed use development comprising of residential, retail, leisure, cultural, community and water space related uses together with provision for town centre car parking. It is also located partly within the Local Plan defined Primary Shopping Area (comprising some Primary Shopping Frontage) and is wholly within the defined 'Town Centre' boundary.

The Progress Made Towards Securing Investment

- 5.3.5 The relevant planning history background for the site has previously been summarised at paragraph 4.3.24 of this statement. In summary, planning permission was granted in April 2015 for the sites' comprehensive redevelopment involving a mixed-use residential and commercial led redevelopment of the site. The hybrid planning permission involves up to 876 residential units, retail (14,133sq m gross previously use class A1), residential (C3 use), business (previously use class B1) and leisure (previously use class D1/D2) uses. Full planning permission was granted for Phase 1 of the development (western part of site), which comprises of a foodstore and small retail units (7,051sq m gross) and office floorspace (362sq m gross). Outline planning permission has been granted for the remainder of the development.
- 5.3.6 The planning permission is now being implemented by Ballymore Group with demolition/ building work having commenced.

The extent to which the Proposals are likely to undermine the Waterside Redevelopment

- 5.3.7 Phase 1 is intended to include a new foodstore with a proposed floorspace of circa 2,800sq m gross, together with a number of small retail units primarily facing onto the High Street. The foodstore and commercial retail and leisure units have, and are being, bought forward with Tesco already trading alongside them at their existing site. The relocation of a foodstore which is already operating in the area approximately 1km from the Brentford Waterside redevelopment is very unlikely to impact on a foodstore operators' decision to open a new store from a smaller 2,800sq m gross foodstore in Brentford Town Centre.
- 5.3.8 In terms of the local retail, commercial and community provision proposed at the Tesco and Homebase sites, this would serve a different role than the provision proposed at Brentford Waterside and will therefore have limited overlap with the floorspace. The commercial floorspace in the Waterside scheme is intended to provide an extension to Brentford Town Centre which serves a larger catchment and complement existing retail and service facilities in the town centre.

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- 5.3.9 Accordingly, having regard to the above, the proposed developments are not considered to result in a significant adverse impact on in-centre investment at Brentford Waterside.

Hounslow Town Centre

- 5.3.10 As part of the scoping exercise, in consultation and agreement with planning officers in the Council, one in-centre investment scheme within Hounslow Town Centre Town Centre has been identified that would need to be taken into account in this assessment: Hounslow High Street Quarter Site.

Hounslow High Street Quarter Site

The Policy Status of the Site

- 5.3.11 As noted in Section 4, the site is allocated within the Local Plan (Allocation 37) for mixed use development comprising 'Mixed Use Leisure, retail and residential with public car parking'. It is also located within the defined Primary Shopping Area and Town Centre Boundary and is therefore defined as a town centre location in retail and 'other main town centre uses' planning policy terms.

The Progress Made Towards Securing Investment

- 5.3.12 Planning Permission has been granted for the comprehensive redevelopment of the site for a mixed-use development involving 588 residential units, a multiscreen cinema of 5,267 sqm, 8,897sq m gross of retail, restaurant and café uses (previously use classes A1-A5), 1,214sq m gross of office floorspace, car parking, and public realm.
- 5.3.13 As noted previously, construction work began on site in December 2017. Significant progress has been made and the first home completions are due to take place in late 2020/early 2021 and the cinema (to be operated by Cineworld) and retail units are due to open in 2021.

The extent to which the Proposals are likely to undermine the High Street Quarter Redevelopment

- 5.3.14 The High Street Quarter development will deliver 8,897sq m gross retail, restaurant and cafe floorspace across 20 small/medium size units within 4 separate development blocks (Blocks A-D). A number of the units will provide supporting food and drink uses which will complement, and trade alongside, the multiplex cinema.
- 5.3.15 There will be limited trading overlap between the proposed relocated Tesco store and local retail, commercial, community uses with the retail floorspace to be delivered as part of the High Street Quarter redevelopment. The format, use, scale and role of the redevelopment scheme is very different. Hounslow is a large town centre serving a large catchment area. The proposed High Street Quarter scheme is intended to reinforce its sub-regional role, so it continues to compete successfully alongside other larger centres. It is not the intention for the scheme to provide a large convenience goods foodstore facility – one was provided in the earlier phase of a wider site (the Asda store). Being located

some 2.5km from the application sites it is also not its intention to provide walkable local retail, commercial or community facilities for the residential units proposed on the application sites.

- 5.3.16 Accordingly, the proposed developments are not considered to result in a significant adverse impact on this in-centre investment scheme.

Hanwell District Centre

- 5.3.17 3 'Development Sites' are identified in the Adopted Ealing Borough Local Plan for potential redevelopment (HAN 1: 64-88 Uxbridge Road (0.15ha), HAN 2: 144-164 Uxbridge Road (0.48ha), and HAN3: Wickes Store, Boston Road (0.84ha)). All three sites have planning permissions for residential led redevelopment with the re-provision of retail/commercial provision in small units at ground floor. We understand that all three planning permissions are being brought forward. Given the distance between Hanwell District Centre from the application sites (3.5km), the different nature of the proposals, and in turn the limited trading overlap, it is considered that the application proposals will not prejudice, delay or prevent these investment schemes coming forward and therefore no significant adverse impact would arise.

Neighbourhood Centres

- 5.3.18 There are currently no allocations for retail, commercial or community development in St Johns Road, Spur Road/London Road, and Thornbury Road neighbourhood centres. There is also no evidence from our visits of any relevant investment being delivered that would need to be considered as part of this impact assessment. Planning officers have also confirmed that they are not aware of any investment that would need to be considered.

Conclusions

- 5.3.19 Accordingly, based on the available evidence, it can be concluded that the proposal will not adversely impact any existing, committed or planned public and private investment within Brentford Town Centre, Hounslow Town Centre, St Johns Road (Isleworth) Large Neighbourhood Centre, Spur Road/London Road Small Neighbourhood Centre or Thornbury Road Small Neighbourhood Centre.

5.4 Impact on Centre Vitality and Viability

Vitality and Viability Health Checks of Existing Centres

- 5.4.1 In assessing whether the proposals result in a 'significant adverse impact' on the vitality and viability on the surrounding centres vitality and viability health check assessments of relevant centres were undertaken by WYG Planning in June 2020.

5.4.2 It is important to note, in accordance with the NPPG, our health checks and impact assessment is based on the current position of a centre and evidence available at the time of writing. Whilst COVID19 may impact a number of operators in the centres there is currently no evidence in terms of the effects it will have on the assessed centres.

5.4.3 We provide a summary of our health checks for each centre in turn below.

Brentford Town Centre

5.4.4 In the 2018 Retail & Town Centre Needs Study (RTCNS) it was concluded that overall Brentford Town Centre was considered to display adequate levels of vitality and viability. The centre was considered to have a strong independent service offer, with higher than national average numbers of retail, leisure and financial and business services. However, the comparison goods offer within the centre was considered to be weak and the environmental quality relatively poor. The vacancy rate within the centre had however declined with a number of units undergoing alterations.

5.4.5 Our updated vitality and viability assessment of the centre finds that:

- The centre continues to provide a good convenience goods offering including a Morrisons foodstore. The convenience sector will be further enhanced following the opening of Brentford Waterside foodstore.
- The leisure service provision in the centre is considered to be reasonable and is a sector which will be significantly improved due to the introduction of new bars and restaurants within the Waterside redevelopment.
- Whilst the overall retail and service provision in the centre has reduced since 2018, this is only for a temporary period whilst the Waterside redevelopment scheme is built.
- Vacancy levels have declined further (from 11 to 4), with the current proportion of units present being well below the UK average (5% compared to 11%).
- Primarily due to the construction boarding around the Brentford Waterside site the environmental quality of the centre is reasonably poor. The centre's environmental quality will be significantly improved following the completion of Brentford Waterside.

5.4.6 Overall, the vitality and viability of Brentford Town Centre is considered to be reasonable. The town centre is currently undergoing significant redevelopment which will introduce an extended and improved range of uses (both retail and non-retail) which will significantly enhance its vitality and viability.

Hounslow Town Centre

- 5.4.7 The 2018 RTCNS found that Hounslow Town Centre displayed reasonably good levels of vitality and viability. In particular, it was found that the centre had a low and improving vacancy rate. It also had a higher than average comparison offer including a number of national retailers. The food and drink offer within the centre had improved and the centre had a good provision of financial and business services. The quality of the environment was considered to be adequate although it was considered that some shopfronts could benefit from improvement.
- 5.4.8 Our assessment of the centre has found that it continues to display reasonably good levels of vitality and viability. Of particular note:
- The centre continues to provide a strong convenience goods offering including a large Asda foodstore, Aldi store, Quality Foods Supermarket and an Iceland store. Current convenience provision remains above the UK average.
 - The comparison goods offer continues to be good and still provides a good mix of national multiple and independent retailers.
 - Current leisure provision in the centre is considered to be reasonable and will be further enhanced as a result of the leisure floorspace (cinema and food and drink uses) being delivered in the High Street Quarter redevelopment scheme.
 - The number of vacant units remains broadly the same since 2018 (19 units compared to 18 units in 2018). The current vacancy level is just 5%, which is below the national average of 12%.
 - Accessibility to the centre by various modes of transport continues to be good.
- 5.4.9 Overall, we consider that the vitality and viability of Hounslow Town Centre is considered to be reasonably good. It's vitality and viability will be further enhanced following the completion of the High Street Quarter redevelopment scheme.

Hanwell District Centre

- 5.4.10 Hanwell District Centre is also considered to be a reasonable healthy centre. Our survey found that
- The centre provides a good mix of shops and services within its 164 units.
 - The Lidl store acts as an important anchor store which compliments the independent traders present in the centre. The proportion of convenience goods units in the centre (13%) is above the UK average (9%).
 - The centre has a strong retail service offer (23% of total units in the centre compared to UK average of 15%) including an unusually large number of hairdressers/beauty salons (20).

- The comparison goods offer in the centre is not particularly strong and is below the UK average. This is not uncommon for a centre the size of Hanwell which is intended to provide a more local shopping and service role.
- The residential uses at first floor level of a number of units contributes to the vibrancy of the centre.
- The vacancy level in the centre (9% (14 units)) is below the UK average (12%).
- Generally, the environmental quality of the centre is considered to be good. Landscaping/public realm in the vicinity of the Boston Road/Uxbridge Road junction helps soften the impact of traffic in this area.

St Johns Road (Isleworth) Large Neighbourhood Centre

5.4.11 Our health check of St Johns Road Large Neighbourhood Centre finds it to be both vital and viable. In particular:

- It provides a good range of day to day shopping and service facilities (47 units) for its local catchment;
- The convenience goods sector is considered to good, with 8 convenience goods operators present including Sainsbury's Local, and 3 other small convenience stores;
- A reasonably number of food and drink outlets are provided including several cafés and sandwich shops and takeaway outlets;
- The centre has a very low vacancy level, containing only 2 vacant units.

Spur Road/London Road Small Neighbourhood Centre

5.4.12 Spur Road/London Road Small Neighbourhood Centre is a small local centre providing just 12 retail/service units. It serves a compact localised catchment providing day to day needs for residents. Alongside 2 off-licences/convenience stores it provides 2 hairdressers/beauty clinics and 4 takeaway outlets/cafes. The environmental quality of the centre is considered to be reasonable albeit somewhat impacted by the road intersection. At the time of our visit there were no vacant units present. Overall, based on our visit to the centre, it is considered to be in reasonable health.

Thornbury Road Small Neighbourhood Centre.

5.4.13 Thornbury Road Neighbourhood Centre also demonstrates reasonable levels of vitality and viability. The centre provides 14 units which include 1 convenience unit, 2 occupied by comparison goods retailers, 4 in retail service use, 4 leisure service operators, and 3 financial and business services. For a small neighbourhood centre providing shops/services to meet the day to day needs of its local catchment the mix of uses is considered to be good. The centre's environmental quality is considered to be reasonable although some shop fronts would benefit from improvements. At the time of our visit there no vacant units were monitored.

Summary

5.4.14 Overall, all of the assessed relevant centres are considered to display reasonable to good levels of vitality and viability. Of particular note, the currently being implemented redevelopment schemes in Brentford and Hounslow town centres which, once completed, will further enhance their vitality and viability.

High Level Quantitative Impact of Proposed Local Retail (previously use class A1) Floorspace on In-Centre Turnover

5.4.15 As set out earlier in this section, whilst an impact assessment is not technically required, in agreement with planning officers in the Council, in order to provide a robust assessment, we provide a 'high level' quantitative impact assessment of the proposed local retail floorspace.

5.4.16 As noted previously, it is important to note from the outset that the proposed local retail, commercial and community floorspace is to serve the proposed (up to) 2,150 residential properties. By far the majority of residents will be new residents to the area and therefore not currently shopping/visiting nearby centres. In reality, as a result, it is considered that there will be very limited trade/turnover drawn from nearby centres. Notwithstanding this, for robustness this assessment assumes that all the new turnover from the proposed local retail floorspace is drawn from existing retail facilities in the area.

5.4.17 The NPPF requires applicants to assess the likely turnover of proposed retail floorspace, the level of expenditure to support that floorspace, and where the new floorspace would be likely to derive its trade from. We have applied a step-by-step methodology to demonstrate anticipated trade diversions and trade impacts on existing retail provision. The methodology is a standard approach adopted by retail planning professionals and follows the advice set out in the NPPG.

5.4.18 In this instance, we have utilised the 2018 RTCNS to assess the turnover of relevant retail facilities/centres. The Study is informed by household telephone survey evidence and provides detailed information of shopping patterns and the turnovers of existing retail facilities within the area.

Turnover of Proposed 'Local' (previously use class A1) Retail Floorspace

5.4.19 In considering impact on in-centre trade we firstly provide details of the estimated retail turnover resulting from the proposals before providing a trading assessment of the potential impact on the patterns of retail expenditure in the surrounding area.

5.4.20 The NPPG (paragraph 18) advises that the design year for testing impact is conventionally taken as the second full calendar year of trading after the opening of the new retail development. As noted in Section 5, the local retail floorspace and relocated Tesco store on the Homebase site should open and trading in 2025. The local retail floorspace on the Tesco store should be open by 2026. For robustness we have adopted a design year of 2026 for both developments.

5.4.21 Figure 5.2 below sets out the potential estimated turnover of the proposed local retail floorspace at the design year (2026).

Figure 5.2: Proposed Local Retail (previously use class A1) Floorspace/Turnover Details, 2026

	Floorspace (sq m)		Sales Density (£/sq m)	Turnover (£m)
	Gross	Net		
Tesco Site				
Convenience	550	385	8,000	3.1
Comparison	400	320	4,500	1.4
Homebase Site				
Convenience	-	-	-	-
Comparison	54	43	4,500	0.2
Total	1,004	748	-	4.7

2016 Prices

5.4.22 In accordance with the NPPG, published company average sales density figures (source: GlobalData.com and Mintel) have been obtained to gauge the turnover of the floorspace. It is estimated that at the design year the proposed developments would generate a sales density of circa £8,000/sq m for the convenience goods floorspace and £4,500/sq m for the comparison goods floorspace.

5.4.23 Applying the respective sales densities to the retail floorspace it is estimated that the proposed developments would generate a convenience goods turnover of £3.1m and a comparison goods turnover of £1.6m. The overall retail turnover is estimated to be £4.7m.

Trade Draw & Impact

5.4.24 In accordance with the NPPG, the amount of trade to be drawn from each centre/facility has been assessed having due regard the character of the proposal and the general assumption that 'like affects like' and the existing shopping patterns and the location of existing retail facilities.

5.4.25 Figure 5.3 sets out our estimated trade draw assessment together with the resultant level of impact. Whilst the impact figures on all centres are considered to be low (below 2.5%), and could not be considered to be at a level which could be interpreted to be significant adverse, it is important to remember that the purpose of the proposed retail, commercial and community floorspace is to primarily serve the residents of the proposed new properties. Accordingly, the proposal would not materially change existing retail shopping patterns and in turn draw any material trade/retail turnover away from existing centres.

Figure 5.3: Estimated Impact of Proposal, 2026

	2026 Retail Turnover (£m)	Trade Diversion (£m)	Impact %
Brentford Town Centre	52.4	1.2	-2.4
Other Brentford	125.7	1.4	-1.1
Hounslow Town Centre	327.4	0.8	-0.2
Other Hounslow	26.6	0.3	-1.2
St John's Road Large Neighbourhood Centre	10.1	0.2	-2.5
Spur Road/London Road Small Neighbourhood Centre	0.5	<0.0	-0.6
Thornbury Road Small Neighbourhood Centre	0.2	0.0	-0.0
Hanwell District Centre	23.0	0.2	-1.0
Other in Hounslow Borough	-	0.5	-
	Total	4.7	

Notes:

Retail Turnovers of centres/facilities are combined convenience and comparison goods turnover derived from the Council's 2018 RTCNS

Retail turnovers for neighbourhood centres not provided in RTCNS therefore WYG has been a judgment based on existing retail provision in each centre.

In the absence of an up to date retail study for Ealing Borough, the retail turnover for Hanwell District Centre is a WYG judgment based on existing retail provision in the centre 2016 Prices

- 5.4.26 The above trading assessment shows that the impact experienced on Brentford Town Centre, Hounslow Town Centre or the smaller neighbourhood centres of St John's Road, Spur Road/London Road and Thornbury Road will be low as a result of the proposal. Furthermore, primarily due to the distance of Hanwell District Centre located in Ealing Borough is also very low. The impact will not materially affect the trading operation of any defined centre with the assessed impact well below any level which could be claimed to be 'significant adverse' in NPPF terms.

Impact of Potential Gym on Tesco Site

- 5.4.27 The applicant is seeking flexibility within the proposed 'other town centre use' floorspace to potentially accommodate a small gym facility on the Tesco site. The gym is likely to be open to members of the public. Members/users of the gym are likely to be a combination of:
1. new gym users who currently do not use a gym who live in close proximity to the application sites; and
 2. existing gym users currently using other gym facilities in the vicinity of the site.

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- 5.4.28 Given the limited gym facilities within the vicinity of the application sites it is considered that the majority of members are likely to be new gym users rather than existing users of gyms in Hounslow and Brentford. Therefore, the impact on existing gyms is likely to be minimal and very unlikely to directly result in any gym closures.
- 5.4.29 Notwithstanding the above, having regard to our survey of Brentford Town Centre (utilising updated Goad land use data) it is noted that there are currently no gym facilities in the town centre for the potential gym to impact upon. At this stage it is unclear whether the Brentford Waterside scheme is to include a new gym facility. Given that a potential gym in the Waterside scheme is likely to also serve the residential units proposed as part of this scheme and having regard to the fact that the application sites are located some 1km distance away it is considered that, if one did come forward, it would not be serving the same catchment as a gym on the Tesco site. Accordingly, it is considered very unlikely that any adverse impacts would arise.
- 5.4.30 In terms Hounslow Town Centre, our survey of the centre identifies that there are currently 5 gyms: Xercise4less on Staines Road, Gold's Gym in the Continental Hotel on Lampton Road, Anytime Fitness on High Street, Kingsley Sports centre on Prince Regent Road, and The Gym health Club in The Blenheim Centre. Albeit because of COVID19 restrictions they were not operating at the time of our visit, the 5 gyms are already operating in close proximity to one another. The potential opening of a further gym on the Tesco site some 2.5km is very unlikely to have any material impact on the operation of these gyms.
- 5.4.31 In terms of neighbourhood centres, there are no gym or health and fitness facilities present in the centres that could be impacted upon by the potential inclusion of a small gym on the Tesco site.
- 5.4.32 Finally, in terms of Hanwell District Centre, gym facilities are limited to the Gold's Gym Health Club on Uxbridge Road. Given the distance of Gold's Gym to the applications sites (3.5km), and therefore the different catchment the potential gym would serve, it is considered that it is very unlikely that members of the Gold's Gym would change their membership and use the potential gym on the Tesco site.
- 5.4.33 Accordingly, it is considered that there would be no significant adverse impacts arising as a result of the inclusion of a potential gym on the Tesco site.

Overall Impact on Centre Vitality and Viability

Brentford Town Centre

- 5.4.34 It is considered that the proposal will not have any adverse impact on the vitality and viability of Brentford Town Centre:
- The evidence shows that the town centre is reasonably vital and viable and currently undergoing significant investment and improvements which will further improve its vitality and viability.

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- There is limited trading overlap between the proposed local retail, commercial and community and the retail shops and services provided within Brentford Town Centre, a higher order centre. The impact assessment demonstrates that the proposals will not materially harm the trading position of existing facilities in the centre. The level of retail trade/turnover assessed to be diverted to the proposal is low (2.4% at 2026).
 - The proposal will not impact upon any current or planned investment in the centre. The Brentford Waterside scheme is currently being implemented. The foodstore in the scheme is being bought forward with Tesco already trading at their existing site. The relocation of a foodstore, just 260 metres from its existing site, which is already operating in the area is very unlikely to impact on another foodstore operators' decision to open a new store from a smaller 2,800sq m gross foodstore in Brentford Town Centre. The local retail, commercial and community provision proposed at the Tesco and Homebase sites would also serve a different role than the provision proposed at Brentford Waterside and will therefore have limited overlap with the floorspace.

5.4.35 Overall, and on the basis of the evidence presented, it is assessed that the impact of the proposed development on the vitality and viability of Brentford Town Centre is acceptable.

Hounslow Town Centre

5.4.36 Having regard to the assessment undertaken, it is considered that the proposals will not have any significant adverse impact on Hounslow Town Centre:

- The evidence shows that Hounslow Town Centre is vital and viable and continues to provide important shopping and services for the Borough.
- Given the limited trading overlap and different catchments of the proposed local retail, commercial and community provision and the retailers and services provided in Hounslow Town Centre the proposals will not materially harm the trading position of the centre. The level of retail trade/turnover assessed to be diverted to the proposal is very low (0.2% at 2026).
- The proposal will not impact on in-centre investment in the town centre: The High Street Quarter scheme. The scheme is currently being implemented and is not intended to provide a large foodstore facility. Furthermore, there will be little trading overlap between the proposed relocated Tesco store and the local retail, commercial, community uses with the retail floorspace to be delivered as part of the High Street Quarter redevelopment.

5.4.37 Accordingly, the proposal will not have any adverse impact on the vitality and viability of Hounslow Town Centre.

Neighbourhood Centres

5.4.38 It is assessed that the proposals will not have any adverse impact on the vitality and viability of St John's Road, Spur Road/London Road, and Thornbury Road neighbourhood centres:

- The evidence shows that all three local centres are vital and viable.
- The proposals will not materially harm the trading position of existing facilities in each of the centres. The level of retail trade/turnover to be diverted to the proposal is low (below 2.5% at 2026). The centres will continue to serve their existing local catchments with no adverse impacts arising as a result of the proposals.
- The proposals will not impact on any investment as there are currently no relevant planned or committed development proposals in the centres.

Hanwell District Centre

5.4.39 In terms of Hanwell Town Centre, again the assessment and evidence available demonstrates that no significant adverse impacts will arise on the town centre as a result of the proposals:

- The town centre is considered to be both vital and viable.
- The trading overlap with the centre is again limited with the retail and services in the town centre serving both a different role and catchment to the proposed local retail, commercial and community uses. The quantitative impact assessment demonstrates that the level of retail trade to be diverted is very low (-1.0% at 2026).
- The proposals will not adversely impact on planned residential led investment on the 3 'Development Sites' in the town centre. This is primarily due to the distance from the application sites (3.5km) and Hanwell, the different nature of the proposals, and the limited trading overlap.

5.5 Conclusions on Impact

5.5.1 Having regard to the level of retail and town centre floorspace proposed, in line with the NPPF and Local Plan Policy TC3 and as agreed with the Council, an assessment of cumulative impact is not required, and the impact test does not apply. Indeed, the proposal actually involves a significant reduction in retail (previously use class A1) floorspace (-4,208sq m gross/-3,809sq m net).

5.5.2 Notwithstanding, and without prejudice to this, for robustness this section of the statement has undertaken a qualitative impact assessment of the retail and other 'town centre uses' proposed on the two sites together with a 'high level' cumulative quantitative impact assessment of the proposed local retail (previously use class A1) floorspace.

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- 5.5.3 The proposal involves the relocation of an existing Tesco foodstore to a site just 260 metres from its existing site with the relocated store being smaller in size. The store is already trading alongside both large and small convenience operators and the proposal is considered to not materially change shopping patterns in the area and in turn result in any adverse impact on existing convenience goods provision in centres.
- 5.5.4 The proposed limited local retail and community floorspace is intended to primarily support the new residents in the (up to) 1,677 proposed new homes. As a result, its trading overlap and impact with surrounding defined centres will be very limited.
- 5.5.5 This impact assessment demonstrates that the proposals will not adversely impact:
- any existing, committed or planned public and private investment within Brentford Town Centre, Hounslow Town Centre, Hanwell District Centre and neighbourhood centres.
 - the vitality and viability of Brentford Town Centre, Hounslow Town Centre, Hanwell District Centre and neighbourhood centres.
- 5.5.6 Accordingly, the assessed impacts on the vitality and viability of the examined centres are not considered to be 'adverse' and are far from being considered as 'significant adverse'. It is therefore concluded that the proposals are acceptable in terms of the tests set by prevailing planning policy insofar as retail/town centre use impact is concerned.
- 5.5.7 Given that the proposal fulfils the requirements of the impact test, the development is appropriate out of centre development which does not cause any harm to the objectives of the London Plan (Policy 4.7). The proposal also meets the London Plan objective (Policy 4.8) by supporting a successful, competitive and diverse retail sector and promoting sustainable access to goods and services.

6.0 Conclusions

6.1 Introduction

6.1.1 This Retail/Town Centre Use Planning Statement has been prepared by WYG Planning on behalf of St Edwards Home Limited in respect of two planning applications on the Tesco Osterley and Homebase store sites, Syon Lane, Brentford, for:

Tesco Osterley store site:

"Outline planning application with all matters reserved except access for the demolition of existing building and car park and erection of buildings to provide residential homes, plus flexible non-residential space comprising commercial, business and service space, and/or learning and non-residential institution space, and/or local community space, and/or public house/drinking establishment, and/or a mobility hub, along with associated access, bus turning, car and cycle parking, and landscaping arrangements."

Homebase store site:

"Full planning application for the demolition of existing building and car park and erection of buildings to provide residential units, a replacement retail foodstore, with additional commercial, business and service space, and a flexible community space, and ancillary plant, access, servicing and car parking, landscaping and associated works"

6.1.2 St Edward Homes Limited is bringing forward the redevelopment of both the Tesco Osterley and Homebase Brentford sites. The existing Tesco store would be re-provided on the Homebase site as part of a mixed-use development with residential above, which releases the opportunity to deliver a comprehensive residential-led mixed-use development on the Tesco site.

6.1.3 The statement addresses the relevant retail/town centre use policy tests outlined in the development plan and the NPPF:

- The sequential approach; and
- A retail impact assessment.

6.1.4 Whilst this assessment has been undertaken on the basis of the old use classes which preceded the new class classifications, the effects of the new classifications which came into force on 1 September 2020 have been considered. It is not considered the changes will affect the results of the assessment and the effects have been accurately reported.

6.2 The Proposals

-
- 6.2.1 The proposals involve the redevelopment of the Homebase Site in parallel with redevelopment proposals for the Tesco Site, to facilitate re-location of the operational Tesco, Osterley store. They provide an unprecedented opportunity to deliver the Council's objectives for residential led redevelopment of both sites, alongside the creation a mixed and inclusive community, a high proportion of quality homes, a new replacement retail use and community facility within a sustainable and liveable location on the Great West Corridor.
- 6.2.2 The Homebase site proposal involves the redevelopment of the site for a mixed use residential (473 residential homes) and foodstore development (relocated Tesco store). The existing Homebase store on the site would close and be demolished as a result of the proposed redevelopment.
- 6.2.3 The Tesco site proposal involves the redevelopment of the site for a residential led development (up to 1,677 residential homes) together with supporting small-scale commercial and community uses at ground floor (maximum of 5,000sq m).
- 6.2.4 The proposals involve the relocation of a Tesco store to a site just 260 metres from its existing site. The relocated Tesco store would be smaller than the existing store. The proposed retail/ commercial/ community provision on the Tesco and Homebase sites is to primarily serve/support the proposed residential units. Overall, the proposals involve a reduction in convenience/comparison retail (previously use class A1) floorspace of 4,208sq m gross/3,809sq m net.
- 6.2.5 In so far as retail/town centre use planning matters are concerned, the principle of the relocation of the Tesco store from its existing site is accepted/supported by emerging local plan policy. In the circumstance where the existing Tesco foodstore is relocated, emerging local plan policy also supports "*local retail provision*" on the Tesco site. These are a key important material consideration.

6.3 The Sequential Approach to Site Selection

- 6.3.1 The detailed analysis in this statement demonstrates that there are no suitable or available sequentially preferable sites or units in Brentford Town Centre, Hounslow Town Centre, Hanwell District Centre, and St Johns Road Large Neighbourhood Centre for the proposed relocated Tesco store. The sequential approach analysis also demonstrates that there are no suitable or available sequentially preferable sites or units in relevant centres in the PCA for the local retail, commercial and community provision proposed on the Tesco site.
- 6.3.2 Overall, it is therefore concluded that the proposed development passes the sequential test requirements set out in the development plan (Local Plan Policy TC3 and Policy 4.7 of the London Plan) and paragraph 86 of the NPPF.

6.4 Retail Impact

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- 6.4.1 Having regard to the level of retail and town centre floorspace proposed, in line with the NPPF and Local Plan Policy TC3, a cumulative assessment of impact is not required, and the impact test does not apply.
- 6.4.2 Notwithstanding, and without prejudice to this, for robustness this statement has undertaken a qualitative impact assessment of the retail and other 'town centre uses' proposed on the two sites together with a 'high level' quantitative impact assessment of the proposed local retail (previously use class A1) floorspace.
- 6.4.3 The impact assessment demonstrates that the proposals will not adversely impact:
- any existing, committed or planned public and private investment within Brentford Town Centre, Hounslow Town Centre,
 - the vitality and viability of Woking Town Centre and Knapp Hill Local Centre
- 6.4.4 Accordingly, the proposals are acceptable in terms of the test set by prevailing planning policy insofar as retail/town centre impact is concerned.

6.5 Overall Conclusions

- 6.5.1 Overall therefore in the light of our detailed analysis, it is concluded that the proposals are consistent with the requirements of current planning policy relating to the sequential approach to site selection and retail impact. Accordingly, the proposals are acceptable from a retail/town centre use planning perspective.

Appendix A

Retail/Town Centre Use Planning Statement Scoping Note

Berkeley Homes (Urban Renaissance) Limited Redevelopment of Tesco Extra Store and Homebase Store Sites, Syon Lane, Brentford Updated Retail/Town Centre Use Planning Statement Scoping Note May 2020

Introduction

The Retail Planning Statement Scoping Note will be prepared in respect of two separate, but interrelated, forthcoming planning applications on the Tesco Extra and Homebase store sites on Syon Lane, Brentford, for:

Tesco Extra store site:

"Residential led development comprising up to 1,650 units (Use Class C3), non-residential floorspace of 5,000 sq m (GIA) (Use Class A1-A5, B1, D1, D2), parking, access arrangements and associated landscaping"

Homebase store site:

"Demolition and erection of buildings to provide up to 470 residential units (Use Class C3), a replacement Tesco foodstore (Use Class A1) of 10,500 sq m (GIA) and 179sqm of flexible retail/office floorspace (Use Class A1-A5/B1), ancillary plant, access, servicing and car parking, landscaping and associated works"

This note sets out the scope, methodology and principal assumptions that are proposed to be adopted in the supporting Retail Planning Statement regarding the sequential approach and retail impact policy tests.

Proposed Developments

The Homebase site proposal involves the redevelopment of the site for 470 residential units, a relocated Tesco store, and small-scale retail/commercial uses at ground floor. The existing Homebase store on the application site would close as a result of the proposed redevelopment.

The Tesco site proposal involves the redevelopment of the site for a residential led development comprising up to 1,650 residential units, together with supporting small-scale retail and community uses at ground floor.

The redevelopment of the Tesco store site will follow after Tesco have relocated into their new store on the Homebase store site.

The existing and proposed retail and commercial floorspace figures are set out in Figure 1.1 below.



Berkeley Homes (Urban Renaissance) Limited
Redevelopment of Tesco Extra Store and Homebase Store
Sites, Syon Lane, Brentford
Updated Retail/Town Centre Use Planning Statement Scoping Note
May 2020

Figure 1.1: Existing and Proposed Retail & Commercial Floorspace

	Retail Uses Subject to Impact Test		Other Main Town Centre Uses subject to Impact Test	Commercial/Community Uses not subject to Impact Test	Total
	A1 Comparison Goods	A1 Convenience Goods	Other A1 Shops (eg Hairdressers & Sandwich Bars) / A3 Restaurants & Cafes / A4 Drinking Establishment/ A5 Takeaway / D1 Gym	D1 Doctors Surgery / D2 Hall / B1 Office	
Existing					
Homebase Site, Syon Lane					
Gross	4,180	-	-	-	4,180
Net	3,762	-	-	-	3,762
Tesco site, Syon Lane					
Gross	11,582		-	-	11,582
Net	2,621	3,931	-	-	6,552
Total					
Gross	15,762		-	-	15,762
Net	6,383	3,931	-	-	10,314
Proposed					
Homebase Site, Syon Lane					
Relocated Tesco Store					
Gross	10,500		-	-	10,500
Net	2,303	3,454	-	-	5,757
Other Floorspace					
Gross	54	-	125	-	179
Net	43	-	100	-	143
Tesco site, Syon Lane					
Gross	400	550	1,850	2,200	5,000
Net	280	385	1,480	2,200	4,345
Total					
Gross	11,504		1,975	2,200	15,679
Net	2,626	3,839	1,580	2,200	10,245
Difference					
Gross	-4,258		1,975	2,200	-83
Net	-3,757	-92	1,580	2,200	-69

Notes:

Floorspace figures provided by applicant

Gross floorspace is GIA

Net floorspace of Homebase assumed to be 90% of gross

Net floorspace of existing and proposed Tesco store assessed at 60% convenience / 40% comparison

Net floorspace of proposed 'Other Main Town Centre Uses subject to Impact Test' assumed to be 80% of gross

Gross/net floorspace of proposed 'Commercial/Community Uses not subject to Impact Test' is the same

Proposed floorspace figures for Tesco site are maximum floorspace figures.

Figures may not add due to rounding

Overall, the proposed development would actually involve a reduction in A1 convenience/comparison retail floorspace of 4,258sq m gross/3,849sq m net.

In terms of other commercial/community uses, whilst the end users have not yet been secured (hence why flexible uses are being sought), for the Tesco site, these are likely to include a number of small scale supporting/ancillary uses including a GP, pharmacy, café, florist, hairdresser, a small community hall, pub, offices, and a gym. Overall, the applications seek planning permission for a



Berkeley Homes (Urban Renaissance) Limited Redevelopment of Tesco Extra Store and Homebase Store Sites, Syon Lane, Brentford Updated Retail/Town Centre Use Planning Statement Scoping Note May 2020

maximum of 4,175sq m gross of other town centre uses and commercial/community floorspace which will primarily be located at ground floor level.

Retail Policy Tests

When considering the application against the retail policy test, the following are important material considerations which should be taken into account by the Council in the determination of the planning application:

- (1) the proposals involve the relocation of an existing Tesco store to a site just 400 metres away;
- (2) the proposed retail provision on the Tesco site is to specifically serve/support the proposed residential units; and
- (3) overall, the proposals involve no increase in retail floorspace.

The principle of the relocation of the Tesco store from its existing site is accepted/supported by emerging local plan policy. In the circumstance where the existing Tesco foodstore is relocated, emerging local plan policy also supports "*local retail provision*" on the Tesco site. These are a key important material consideration.

Sequential Approach

In accordance with the NPPG – Town Centres and Retail section (hereon in referred to as NPPG) (#11), our application of the sequential approach test will be "*proportionate and appropriate for the proposals*".

Given that the nature and role of the retail/town centre floorspace proposed on each site is different (with the proposed relocated Tesco store servicing a reasonably wide catchment and the proposed local retail provision on the Tesco site primarily serving the proposed homes on the Tesco site), two separate sequential approach assessments, based on different site search parameters, will be undertaken.

Proposed Relocated Tesco Store, Homebase Site

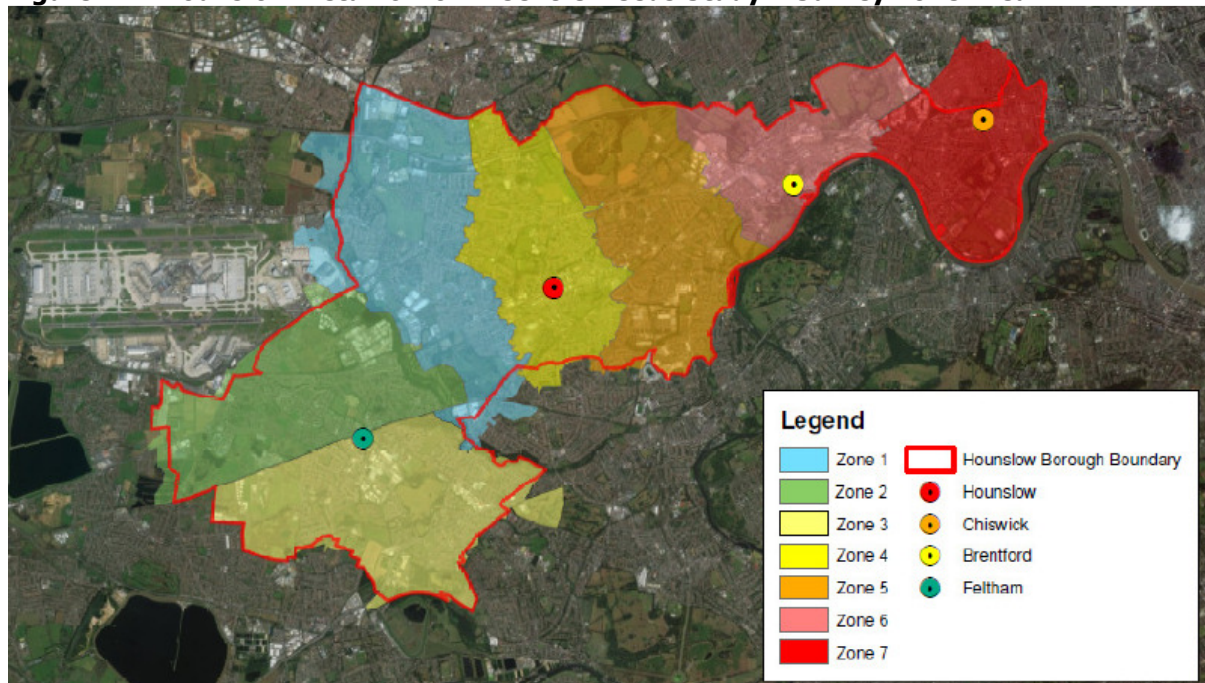
Site Search Parameters

The Hounslow Retail and Town Centre Needs Study (September 2018) broadly identifies the primary catchment area (PCA) of existing main-food convenience facilities in Brentford (primarily the existing Tesco store). The study identifies that Survey Zones 4, 5 and 6 broadly represent the PCA of the existing main-food convenience facilities.

Figure 1.2 below provides an extract from the Study and shows the three zones which are considered to represent the PCA and in turn the area of search requirement with regard to potential sequentially preferable sites.



Figure 1.2: Hounslow Retail & Town Centre Needs Study – Survey Zone Area



We propose to review the following centres within the PCA (Zones 4, 5 and 6):

- Brentford Town Centre;
- Hounslow Town Centre; and
- Isleworth Large Neighbourhood Centre.

In order to provide a robust assessment, we also propose to review Hanwell District Centre which is located to the north of the application site within Ealing Borough. It is important to note from the outset that a relocated Tesco store in Hanwell Town Centre would not serve the same catchment as the existing or proposed relocated Tesco store. Residents in Hounslow Borough, most notably in Brentford, would be disadvantaged if the Tesco store was relocated to Hanwell.

Whilst Old Isleworth Large Neighbourhood Centre and Heston Large Neighbourhood Centre are located within the PCA both these centres are located towards the periphery of the PCA. A relocated Tesco store within one of these centres would not serve the same catchment as the existing or proposed relocated Tesco site. We therefore do not consider it necessary to assess these neighbourhood centres.

Given the size of the proposed relocated Tesco store and the role of the smaller neighbourhood centres in the Borough we do not consider it appropriate to assess smaller neighbourhood centres. This approach is in accordance with Adopted Local Plan Policy TC3(g) which identifies that small neighbourhood centres should be considered for "*smaller proposals that are suitable to the proportions of the centre*".



Berkeley Homes (Urban Renaissance) Limited Redevelopment of Tesco Extra Store and Homebase Store Sites, Syon Lane, Brentford Updated Retail/Town Centre Use Planning Statement Scoping Note May 2020

Flexibility of Format and/or Scale

As confirmed by the Secretary of State call-in decision in Rushden Lakes (APP/G2815/V/12/2190175), there is no requirement to consider the potential for disaggregation when applying the sequential approach. The recent Mall, Cribbs Causeway planning appeal decision (APP/P0119/V/17/3170627) further supports that there is no requirement to disaggregate a proposed development.

The Rushden Lakes Secretary of State decision and the Mall decision confirms that the sequential test relates entirely to the application proposal as a whole; it is not a question of whether a materially reduced or otherwise different scheme can in theory be pursued on other sites. Provided that an element of flexibility is exercised on issues such as format and scale, any potential sequential sites should be considered only in terms of whether they could accommodate a broadly similar development proposal. In this case a relocated foodstore of broadly 10,500sq m gross floorspace with sufficient car parking (approx. 400 spaces) and adequate servicing arrangements.

Accordingly, WYG will review the sequential approach to establish whether other site opportunities are available or suitable to support the applicant's development which would require a site of at least 1.5ha. Any site smaller than 1.5ha would not be able to meet car parking requirements/standards, adequate servicing arrangements, and sufficient/adequate floorspace at ground floor level.

Notwithstanding the above, in order to demonstrate flexibility, we propose to reduce the minimum site area requirements by a further 20% (1.2ha) to establish whether other site opportunities are available or suitable to support the applicant's development.

Availability

In accordance with the NPPF (#86), any sequentially preferable site/unit needs to be available or expected to become available within a reasonable period. Any alternative potentially sequentially preferable site/unit should be available on approximately the same timescale as the subject planning application. If there is any uncertainty with regard to the availability of a site it cannot be considered to be available.

Subject to grant of planning permission, the redevelopment works at the Homebase site are anticipated to start later in 2020 with Tesco anticipated to relocate and be trading by 2024. Accordingly, for a potential alternative site to be considered available in the context of the subject proposals it should be available in a time frame that could allow a scheme to be open for trading by 2024.

Proposed Sites/Units to be Assessed

In accordance with the NPPG (#11) we wish to discuss and agree the potential alternative sites with the Council. We have undertaken an initial review of both Brentford and Hounslow town centres, Hanwell District Centre, and Isleworth Large Neighbourhood Centre and propose to assess the following sites/units.

- Brentford Waterside Redevelopment Site;
- Hounslow High Street Quarter Redevelopment Site; and



Berkeley Homes (Urban Renaissance) Limited
Redevelopment of Tesco Extra Store and Homebase Store
Sites, Syon Lane, Brentford
Updated Retail/Town Centre Use Planning Statement Scoping Note
May 2020

- Vacant units in Hounslow and Brentford town centres, Hanwell District Centre, and Isleworth Large Neighbourhood Centre.

We are not aware of any other sites/units that would need to be assessed.

Local Retail, Commercial & Community Provision, Tesco Site

Site Search Parameters

The NPPG (#12) identifies that the use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations.

The purpose of the proposed ground floor retail and community use floorspace is to support the proposed circa 1,650 residential homes. An indicative breakdown of the potential retail, commercial and community uses is provided in Figure 1.3 below.

Figure 1.3: Potential Indicative Breakdown of Retail/Commercial Use on Tesco Site

	Use Class	Gross Floorspace (sq m)	Net Floorspace (sq m)
Convenience/Comparison Retail Uses subject to Impact Test			
A1 Comparison			
Florist	A1 non-food	88	70
Pharmacy	A1 non-food	205	164
<i>Sub-total A1 Comparison</i>		<i>293</i>	<i>234</i>
A1 Convenience			
Local Convenience Store	A1 food	511	409
Sub-total		804	643
Other Main Town Centre Uses subject to Local Plan Policy TC3 Impact Test			
Hairdressers*	A1 hairdresser	82	66
Gastro Pub	A4	541	433
Cafe	A3	106	85
Gym	D1	860	688
Sub-total		1,589	1,271
Commercial/Community Uses not subject to Local Plan Policy TC3 Impact Test			
GP	D1	281	281
Office	B1	1,438	1,438
Hall	D2 (community centre)	281	281
Sub-total		2,000	2,000
Total		4,393	3,914

Notes:

Breakdown of uses is indicative only.

*Technically hairdressers should be included under A1 retail uses but for ease of comparison with Figure 1.1 have been included in 'Other Main Town Centre Uses subject to Local Plan Policy TC3 Impact Test'.

The floorspace figures set out in Figure 1.1 are higher because they are maximum (up to) floorspace figures to allow flexibility (given that no end users are secured yet).

The retail, commercial and community use floorspace would not come forward without the proposed homes. Accordingly, given the nature/role of the proposed floorspace, in this instance the floorspace is site specific to the application site. This has already been recognised by the Council in allocating the

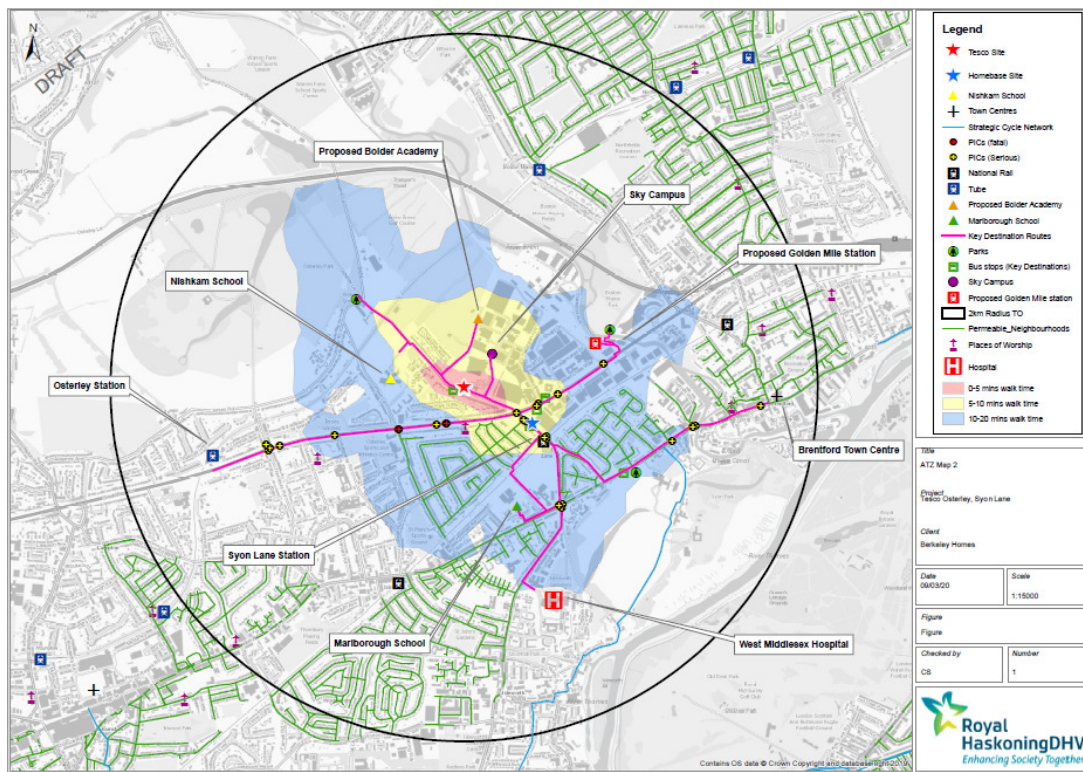


Berkeley Homes (Urban Renaissance) Limited Redevelopment of Tesco Extra Store and Homebase Store Sites, Syon Lane, Brentford Updated Retail/Town Centre Use Planning Statement Scoping Note May 2020

site in the emerging local plan (Local Plan Review) for residential use supported by 'local retail provision and community uses'.

Notwithstanding the above, for robustness the Retail Planning Statement will review whether there are any sequentially preferable sites/units in surrounding defined centres within a 10 minute walking distance radius from the application site. The 10 minute walking distance radius reflects what is defined as the preferred maximum walking distance to 'town centres' from the Institute of Highway Engineers (IHT's) 'Providing for Journeys on Foot' document.

Figure 1.4: Plan showing 10 minute walking catchment from the Tesco Site



There are no defined centres that fall within the 10 minute walking catchment area from the Tesco site. Accordingly, there are no centres that are capable of providing 'local retail and community services' for the proposed 1,650 homes.

Notwithstanding this, in order to provide a robust assessment we propose to consider centres within the 20 minute walking catchment. The only centre that falls within the 20 minute walking catchment is Spur Road/London Road Small Neighbourhood Centre.

The sequential approach assessment for the Tesco site proposals will therefore consider potential sequentially preferable units/sites within or on the edge of Spur Road/London Road Small Neighbourhood Centre.

Flexibility of Format and/or Scale



Berkeley Homes (Urban Renaissance) Limited
Redevelopment of Tesco Extra Store and Homebase Store
Sites, Syon Lane, Brentford
Updated Retail/Town Centre Use Planning Statement Scoping Note
May 2020

In accordance with the previously mentioned Rushden Lakes Secretary of State decision and the Mall decision, WYG will review the sequential approach to establish whether other site/unit opportunities are available or suitable to support the applicant's development, up to 5,000sq m gross of commercial/community floorspace at ground floor level.

In order to demonstrate flexibility, we propose to review whether sites/units are able to accommodate retail and community floorspace of between 4,500 to 5,500sq m gross.

Availability

As previously noted, in accordance with the NPPF (#86), any alternative potentially sequentially preferable site/unit should be available in approximately the same timescale as the subject planning application. If there is any uncertainty with regard to the availability of a site/unit it cannot be considered to be available.

The redevelopment of the Tesco site will only start once Tesco have relocated to their potential new store on the Homebase site. Subject to the grant of planning permission, the redevelopment of the Tesco site is anticipated to start on site once the Tesco on the Homebase site has opened, i.e. 2024. The retail units would be delivered within the first phase of development. Accordingly, for a potential alternative site to be considered available in the context of the subject proposals it should be available in a time frame that could allow a retailer/community occupier to be open by 2025.

Retail Impact

In accordance with the NPPG (#17) our impact test will be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible.

As advised by NPPG (#17), we seek to agree the scope, key impacts for assessment, and level of detail required with the Council.

Impact on Centre Vitality and Viability

Adopted Local Plan Policy TC3 requires an impact assessment where development proposals outside of the borough's four main town centres involve over 500sqm of A1 retail or 2,500sqm of other main town centre use floorspace.

In terms of A1 retail floorspace, the two interlinked planning applications involve a reduction in A1 retail floorspace (-4,258sq m gross). Turning to other main town centre uses subject to the impact test, as set out in Figure 1.1, collectively the two planning applications involve a maximum of 1,975sq m gross floorspace. This level of 'other main town centre use' floorspace also falls below the locally set Policy TC3 threshold. Accordingly, there should not be requirement to undertake an impact assessment.

Notwithstanding the above, in order to provide a robust assessment, the Retail Planning Statement will undertake a qualitative impact assessment of the proposed retail and other town centre uses (subject to the impact test) on the two sites together with a 'high level' quantitative impact assessment of the proposed 'local retail and main town centre use floorspace' on the Tesco site.

We do not consider that a detailed quantitative impact assessment is necessary or appropriate in this instance. The reasoning for this is because the proposals involve:



Berkeley Homes (Urban Renaissance) Limited
Redevelopment of Tesco Extra Store and Homebase Store
Sites, Syon Lane, Brentford
Updated Retail/Town Centre Use Planning Statement Scoping Note
May 2020

- (1) a relocation of an existing foodstore to a site just 400 metres from its existing site (with the relocated store being smaller in size);
- (2) limited local retail and community floorspace to specifically support 1,650 proposed new homes; and
- (3) no gross or net increase in retail floorspace.

In order to inform our impact assessment and understand the current health of the nearby centres up vitality and viability assessment of the following centres will be undertaken:

- Brentford Town Centre;
- Hounslow Town Centre;
- Hanwell District Centre (within Ealing Borough);
- Isleworth Large Neighbourhood Centre;
- Thornbury Road Small Neighbourhood Centre; and
- Spur Road/London Road Small Neighbourhood Centre.

The assessments will, where relevant, have regard to the health checks undertaken as part of the Council's Retail & Town Centres Needs Study and update them where necessary.

The existing situation also represents an important material consideration. The Tesco store is already trading and whilst Homebase will close, the relevant planning permission for the store allows unrestricted non-food/comparison goods to be sold from the store (including clothing and footwear).

Impact on Existing, Planned and Committed In-Centre Investment

In reviewing whether there is any public or private investment planned in above referenced six town/district/neighbourhood centres regard will be had to site allocations in the development plan and discussions with planning officers. We are only aware of the following two in-centre investment schemes that would need to be assessed as part of the impact assessment:

- Brentford Waterside Redevelopment; and
- Hounslow High Street Quarter Redevelopment.

Officers have confirmed the position on both sites as follows:

- Brentford Waterside (Land South of Brentford High Street) - the site has planning permission for a mixed-use development (LPA ref. 00607/BA/P2). This permission has been implemented with demolition work having commenced. The approved scheme includes a block with retail uses that has a large retail unit (foodstore) with this block providing c. 2,800 sqm GEA of retail which would also not appear to meet the site criteria/ format for the relocated Tesco store.
- Hounslow High Street Quarter - the site has planning permission for a mixed use development (LPA ref. 00616/F/P21 as amended by 00616/F/P23). This permission has been implemented with construction well under way. The A1-A5 retail floor area of the approved development is now 6,437 sqm (GIA) and spread over multiple units which would not meet



Berkeley Homes (Urban Renaissance) Limited
Redevelopment of Tesco Extra Store and Homebase Store
Sites, Syon Lane, Brentford
Updated Retail/Town Centre Use Planning Statement Scoping Note
May 2020

the site criteria/ format for the relocated Tesco store. Additionally, a variety of A1-A5 uses is envisaged including food and beverage outlets.

We are not aware of any in-centre investment planned or committed in Hanwell District Centre, St Johns Road Neighbourhood Centre, Thornbury Road Neighbourhood Centre, and Spur Road/London Road Neighbourhood Centre. Officers are also not aware of any other sites that would require consideration as part of the impact assessment.



Appendix B

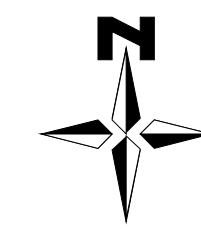
Experian Goad Plans showing Vacancies in
Brentford Town Centre, Hounslow Town Centre
and Hanwell District Centre



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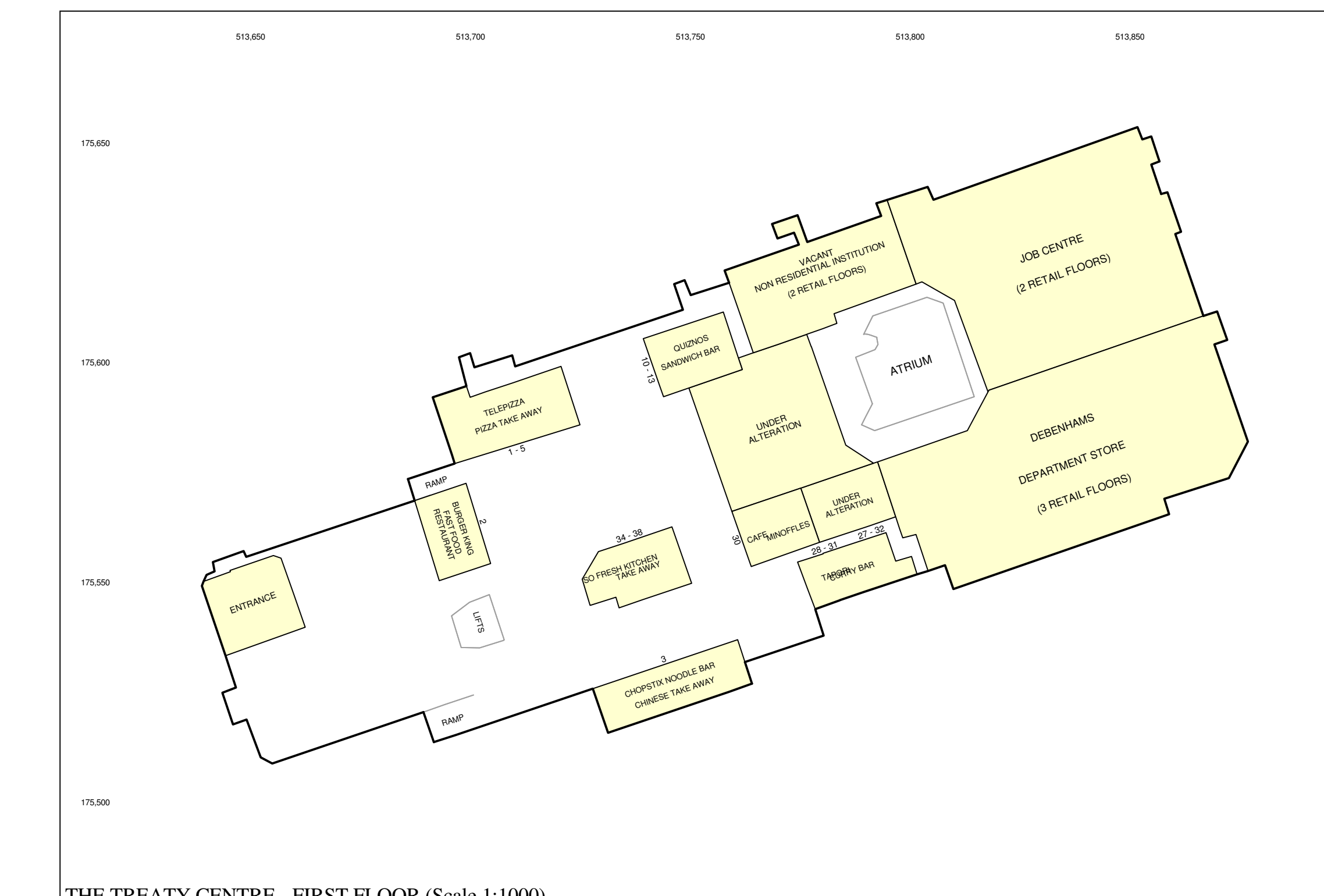
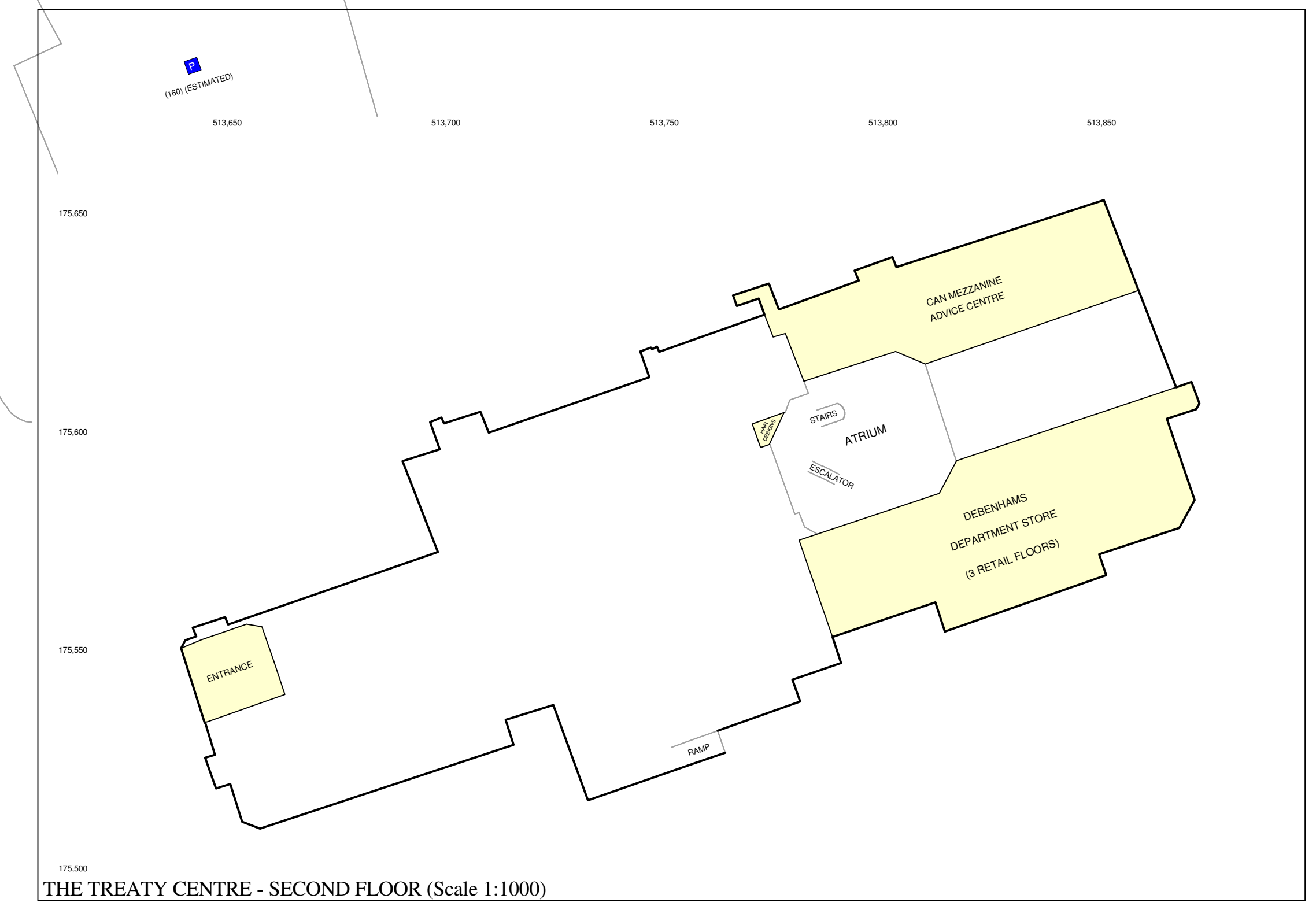
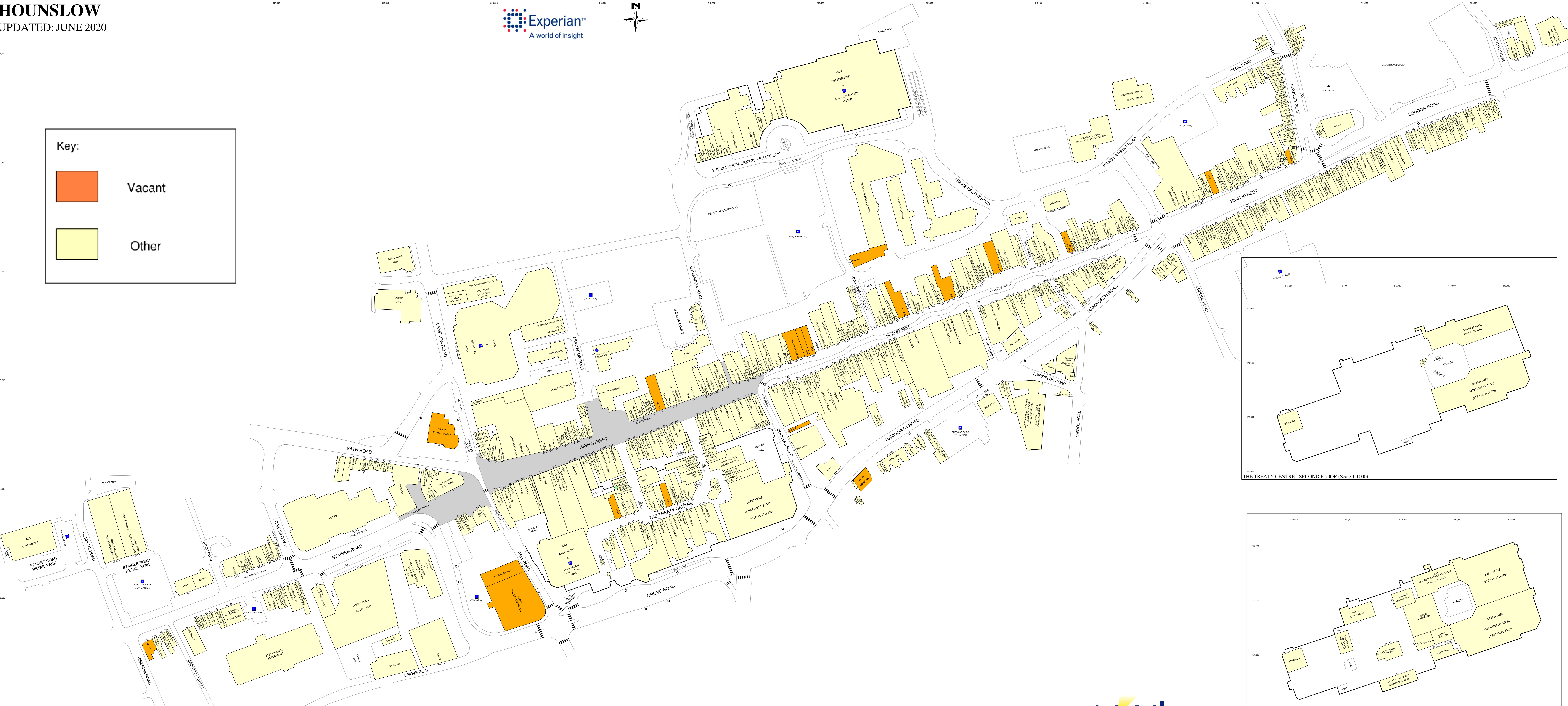
- Vacant
- Other





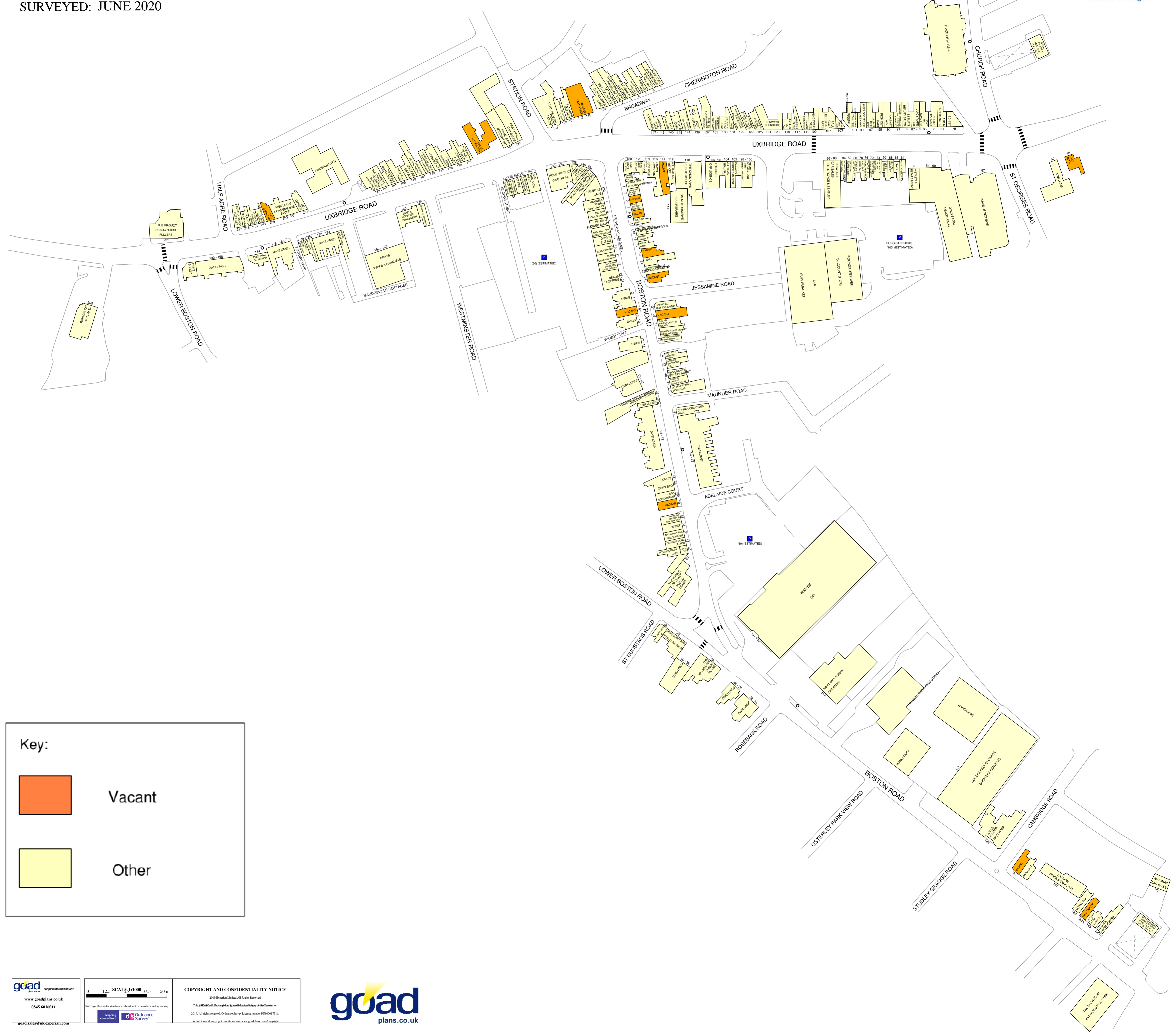
Key:

- Vacant
- Other





HANWELL

SURVEYED: JUNE 2020



Key:

	Vacant
	Other