Unit 1, Victoria Retail Park, Crown Road, Ruislip, HA4 0AJ

Planning and Retail Statement

Marks & Spencer plc

12 February 2026

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Contents

1.0 Introduction

1.1 This Planning and Retail Statement has been prepared by Lichfields to accompany planning applications for the proposed reconfiguration and works to Unit 1, Victoria Retail Park, Crown Road, Ruislip, HA4 0AJ ('the site'). The applications are submitted on behalf of Marks and Spencer Plc ('M&S'). The Local Planning Authority is the London Borough of Hillingdon ('LB Hillingdon' or 'the Council').

1.2 To facilitate the occupation of Unit 1 by M&S, two planning applications are submitted to LB Hillingdon under separate cover, as follows:

- A full planning application for continued use as a retail unit (Class E(a)), including food sales, with external alterations to the front, rear and side elevations of the unit, demolition and other works to the existing garden centre, provision of external plant area, installation of new trolley bays, cycle parking and other associated works.
- A full planning application for reconfiguration of existing mezzanine and installation of additional mezzanine floorspace.

1.3 In advance of submitting these planning applications, M&S has engaged in pre-application discussions with the Council. This included a meeting with the LB Hillingdon Chief Executive and LB Hillingdon Director of Planning and Sustainable Growth on 16 October 2025.

1.4 This Statement has been prepared to provide an assessment of the planning and retail matters raised by the proposals, including retail planning policy, and in particular the sequential and impact tests.

1.5 Please refer to the accompanying Covering Letter, prepared by Lichfields, for the submitted drawings and documentation respective to the two applications. Email correspondence issued by LB Hillingdon on 29 October 2025 agreed the scope of application deliverables.

Planning and Retail Statement Structure

1.6 The remainder of this Planning and Retail Statement includes the following sections:

- **Section 2.0** provides an overview of the Site, its surroundings and relevant planning history;
- **Section 3.0** describes the Proposed Development;
- **Section 4.0** sets out the relevant planning policy and guidance;
- **Section 5.0** sets out the results of the sequential assessment;
- **Section 6.0** sets out the retail impact assessment;
- **Section 7.0** comprises an assessment of the proposals in planning terms, against relevant planning policy;
- **Section 8.0** outlines anticipated Section 106 obligations; and
- **Section 9.0** summarises the benefits of the Proposed Development and draws key conclusions.

1.7 The following Appendices are included:

- **Appendix 1:** Sequential Site Assessments
- **Appendix 2:** Health Checks
- **Appendix 3:** Retail Impact Assessment

2.0 Background

The Site

2.1 The site comprises Unit 1 at Victoria Retail Park, Crown Road, Ruislip, HA4 0AJ. Victoria Retail Park is located along the south side of Victoria Road, approximately 400m east of the South Ruislip Local Centre. Unit 1 is a large format two storey retail unit (Class E(a)) with retail floorspace at ground floor and mezzanine level, currently occupied by The Range. An ancillary external fenced area is located east of the former garden centre, associated with the former occupation of Unit 1 by Homebase.

2.2 The front facing façade of Unit 1 comprises weatherboarding and entrance portal features with a dated mansard roof. The materiality predominantly comprises brickwork, mansard roof tiling and weatherboard cladding. The existing design and façade treatment is considered dated and of limited architectural merit, typical of late 20th century retail park development.

2.3 The site is accessed via Crown Road, off Victoria Road, to the east of Unit 1. A shared car park is located to the north of the retail units at Victoria Retail Park, comprising hardstanding that occupies the Victoria Road frontage between Civic Way and Stonefield Way. A service yard is located to the rear (south) of the Unit 1, accessed via Crown Road.

2.4 As set out in the Environment Agency Flood Map for Planning, the site is located in Flood Zone 2, although as set out in the FRA, the site actually falls within Flood Zone 3. LB Hillingdon represents the Local Lead Flood Authority (LLFA) and has prepared a Surface Water Management Plan (SWMP). The SWMP identifies Critical Drainage Areas in the Borough, designated under London Plan Policy SI13 (Sustainable Drainage). The site is located within SWMP Critical Drainage Area ref. CDA 027 - Victoria Retail Park.

2.5 The northern area of Victoria Retail Park car park includes existing deciduous trees, and soft landscaping adjacent to Victoria Road. The existing trees located along Victoria Road are subject to a blanket Tree Preservation Order (LPA TPO ref. 562). The TPO parameters are set out at Figure 2.1 below:

Figure 2.1 Victoria Retail Park TPO Ref. 562

Source: LB Hillingdon Protected Tree Map

2.6 The site is not subject to allocations or any further designations in the LB Hillingdon Local Plan.

Surrounding Area

2.7 The Retail Park comprises a mixture of national retailers, associated car parking, public realm and soft landscaping. It is an out of centre site in retail planning terms, as defined by Annex 2 of the National Planning Policy Framework. Adjacent uses within the Retail Park include Currys (east) and Tapi Carpets & Floors (west). Commercial properties are located to the south, with occupiers including CCF West London and B&K Environmental Services.

2.8 Land immediately south and east of Victoria Retail Park, adjacent to Stonefield Way and Crown Road, comprises a designated Strategic Industrial Location by London Plan Policy E5 (Strategic Industrial Locations).

2.9 To the north of the site and Victoria Road is Queensmead School, representing a non-designated heritage asset identified in the LB Hillingdon Local List (ref. 199). To the east of Queensmead School on the north side of Victoria Road are residential properties.

2.10 The site is located 300m north east of the LB Hillingdon Air Quality Management Area (AQMA) boundary, which follows the Chiltern-Marylebone railway line south-west of Victoria Retail Park.

2.11 As identified above, the site is located approximately 500m east of South Ruislip Local Centre, designated by Local Plan Policy DMTC3 (Maintaining the Viability of Local Centres and Local Parades).

Accessibility

2.12 The Victoria Retail Park car park in front of the store between Civic Way and Crown Road comprises 336 parking spaces, including 322 no. standard parking spaces, nine disabled parking spaces, two parent & child parking spaces and three reserve & collect parking spaces.

2.13 The Retail Park is accessible by sustainable modes of travel, within walking and cycling distance of residential and commercial development and in close proximity to public transport services. Civic Way bus stop is located on Victoria Road close to the site, operating the 114 service into Ruislip town centre. South Ruislip Railway and Underground Station is approximately 700m east of the site, operating London Underground and Chiltern Railway services.

2.14 The Transport Statement, prepared by Caneparo Associates, provides further details regarding the accessibility credentials of the site.

Relevant Planning History

2.15 The following planning history has been identified from a review of the LB Hillingdon public planning register, and is considered of relevance to this application:

Table 2.1 Relevant Planning History

LPA Ref. ***(Appeal Ref.)***	**Description of Development**	**Decision**
47046/C/93/0752	*Demolition of existing buildings and erection of 55,000 sq ft (5,109.5 sq m) of non-food retail warehousing (Class A1) and 71,810 sq ft (6,671.1 sq m) of light industry and warehousing (Class B1C /B8) (outline application).*	Approved 12/05/1994
47046/92/1800 *(APP/R5510/A/93/ 225620)*	*Erection of 110,300 square feet (10,246 square metres) of non-food retail warehousing Class A1 (involving demolition of existing buildings) (outline application).*	Refused 09/06/1993 Appeal dismissed 25/05/1994
47046/D/93/0753 *(APP/R5510/A/93/ 226535)*	*Demolition of existing buildings and erection of 75,000 sq.ft. of non-food retail warehousing (Class A1) and 59,000 sq.ft. of warehousing (Class B1(c)/B8) (outline application) (duplicate application).*	Refused (date not stated) Appeal allowed 25/05/1994
47046/H/95/0657	*Details of surface water drainage and storage in compliance with condition 6 of the Secretary of State's appeal decision ref. APP/R5510/A/93/226535 dated 25/05/94; Erection of 75,000 sq ft of non- food retail warehousing (Class A1) and 59,000 sq ft of warehousing (Class B1c/B8) (outline application).*	Approved 02/02/1996
47046/F/95/0550	*Reserved matters (details of scheme of landscaping) in compliance with condition 1a of the Secretary of State's appeal decision ref. APP/ R5510/A/93/226535 dated 25/05/94; Erection of 6,967 sq. metres of non-food retail warehousing and garden centre.*	Approved 22/05/1995
50209/B/95/1270	*Erection of an open sided canopy within existing garden centre enclosure.*	Approved 02/11/1995
50209/C/95/1662	*Variation of condition 7 (hours of opening) in compliance with the Secretary of State's appeal decision ref. APP/R5510/A/93/226535 dated 25/05/94; Erection of 75,000 square feet of non- food retail warehousing (Class A1) and 59,000 square feet of warehousing (Class B1 and B8).*	Approved 13/12/1995
50209/D/98/1315 *(T/APP/R5510/A/98/1014706/P7)*	*Variation of condition 1 (to allow store to trade 8.00am - 10.00pm Monday - Friday, 8.00am - 9.00pm - Saturdays and 8.00am - 10.00pm on ten Saturdays within any calendar year) of planning permission ref.50209C/95/1662 dated 13/12/95.*	Refused 13/11/1998 Appeal Allowed 09/04/1999

LPA Ref. ***(Appeal Ref.)***	**Description of Development**	**Decision**
50209/APP/2012/1857	*Installation of covered storage canopy within existing service yard.*	Approved 24/09/2012

Source: LB Hillingdon Public Planning Register

2.16 Of relevance to this application is Condition (v) attached to appeal decision ref. APP/R5510/A/93/226535, which restricts the unit to the sale of non-food comparison goods. The wording of Condition (v) is as follows:

"The development hereby approved shall be used solely for the sale of non-food comparison goods and for no other purpose including any other use within Class A1 of the Town and Country Planning (Use Classes) Order 1987 unless prior written consent is obtained from the Local Planning Authority."

3.0 Proposed Development

3.1 The Proposed Development comprises the reconfiguration and works to the former Homebase Unit (Unit 1) at Victoria Retail Park, Crown Road, Ruislip to deliver a new full line M&S store.

3.2 As set out in the accompanying Operator Statement, the new M&S store will provide an exemplar, state of the art retail experience to the customers of South Ruislip and the wider catchment within a well-designed and expertly retrofitted building which complements the surrounding area. The store will provide an outstanding new retail offer for the wider Victoria Retail Park and bring the look and feel of other exemplar best in class M&S full line stores to South Ruislip and the surrounding area.

3.3 The store will have the full M&S range across all categories of clothing and home, health and beauty, wellness and food. The product range aims to lead the way in modern mainstream style, sustainability, quality, and value.

3.4 To facilitate the new M&S store, planning permission is sought under the following two full planning applications, as summarised below.

Full Planning Application: Main Works

3.5 The proposed description of development is as follows:

"Continued use as a retail unit (Class E(a)), including food sales, with external alterations to the front, rear and side elevations of the unit, demolition of the existing garden centre, provision of plant area, installation of new trolley bays, cycle parking and other associated works."

3.6 This full planning application seeks continued retail use Class E(a) of Unit 1, including food sales. The reconfigured unit will include a food hall with a net sales area of 1,685 sq.m. With respect to retail impact, the proposed additional floorspace for food sales is assessed at Section 6.0 of this Planning Statement.

3.7 The proposed external alterations focus on recladding and removal of outdated features to the front, rear and side elevations of Unit 1, removal of the external garden centre area, provision of a new plant area and reconfiguration of the car park to increase trolley bay and cycle parking provision. No change is proposed to the height of the retail unit. A summary of the proposed works are set out below:

- Removal of existing entrance feature pods and mansard roof structures to simplify the façade and remove redundant elements.
- Installation of new cladding to elevations and replacement of existing weatherboard panels to create a clean and contemporary façade treatment.
- Installation of new glazed window openings and new means of escape doors.
- Recladding works to the service area to the rear of the store.
- Removal of the external former garden centre area to the side (east) of Unit 1 and creation of a new dedicated plant area to the rear (south) of this area, including the installation of new fencing.

- Installation of a refrigerated external storage container adjacent to the service yard loading bay.
- Installation of 17 no. new Sheffield stands (comprising 34 cycle parking spaces).
- Minor car park works, including the removal of four existing trolley bays and 13 no. standard car park spaces to allow for:
  - i installation of six new trolley bays;
  - ii creation of two disabled parking spaces; and
  - iii creation of seven additional parent and child parking spaces.

3.8 As noted above, it is proposed that the former garden centre and associated lean-to structure immediately adjacent (east) of Unit 1, associated with the former Homebase use, is to be demolished and cleared. An area for plant associated with the proposed use of the store by M&S is to be located at the rear of this area of the site.

3.9 The car park works noted above represent a net reduction of four car parking spaces. No cycle parking is currently available on site, and therefore the proposed provision will result in a net increase of 34 cycle parking spaces.

3.10 Access arrangements are proposed to remain as existing. Delivery and servicing access will continue to utilise the existing goods entrance at the rear (south) of the site, accessed via Crown Road. A Waste Management Plan also accompanies the full planning application, detailing on-site waste and recycling storage facilities and arrangements for collection.

3.11 No changes to the existing landscaping or trees at Victoria Retail Park are proposed.

3.12 The proposal will not increase the impermeable area at the site. The existing drainage network and connection will be retained.

3.13 As detailed on the accompanying application drawings, prepared by Brooker Flynn, associated signage for the M&S store will be subject to a separate application for advertisement consent in due course.

Full Planning Application: Mezzanine Floorspace

3.14 The proposed description of development is as follows:

"Reconfiguration of existing mezzanine and installation of additional mezzanine floorspace."

3.15 The full planning application seeks to reconfigure the existing mezzanine which will result in 826 sq.m GIA of additional mezzanine level floorspace. A summary of the existing and proposed mezzanine level floorspace is included at Table 3.1 below.

Table 3.1 Existing and Proposed Mezzanine Level Floorspace

Mezzanine Floorspace	Existing	Proposed	Change
GIA	1,249 sq.m	2,075 sq.m	+ 826 sq.m
Net Sales Area	852 sq.m	1,120 sq.m	+ 268 sq.m

3.16 Due to the apportionment of mezzanine floorspace for back of house and staff use, the mezzanine level retail floorspace increase of 826 sq.m GIA equates to a 268 sq.m increase in mezzanine level net sales area.

3.17 No food sales floorspace is proposed at mezzanine level. In retail impact terms, the additional non-food floorspace proposed at mezzanine level is simply a relocation of existing non-food sales floorspace from the ground floor. Therefore, a retail impact assessment is not required for the additional mezzanine level floorspace.

3.18 In summary, this planning application solely seeks permission for the reconfiguration of the existing mezzanine and additional mezzanine floorspace.

3.19 Table 3.2 below provides a summary of the total proposed floorspace breakdown within the unit.

Table 3.2 Floorspace breakdown within unit

Total	**Existing**	**Proposed**	**Change**
GIA	4,900 sq.m	5,731 sq.m	+ 831 sq.m
Net Sales Area	4,125 sq.m	4,130 sq.m	+ 5 sq.m
Convenience Goods Net Sales Area	0	1,685 sq.m	+ 1,685 sq.m
Comparison Goods Net Sales Area	4,125 sq.m	2,445 sq.m	- 1,680 sq.m
Ground Floor	**Existing**	**Proposed**	**Change**
GIA	3,651 sq.m	3,656 sq.m	+ 5 sq.m
Net Sales Area	3,273 sq.m	3,010 sq.m	- 263 sq.m
Convenience Goods Net Sales Area	0	1,685 sq.m	+ 1,685 sq.m
Comparison Goods Net Sales Area	3,273 sq.m	1,325 sq.m	- 1,948 sq.m
Mezzanine	**Existing**	**Proposed**	**Change**
GIA	1,249 sq.m	2,075 sq.m	+ 826 sq.m
Net Sales Area	852 sq.m	1,120 sq.m	+ 268 sq.m
Convenience Goods Net Sales Area	0	0	-
Comparison Goods Net Sales Area	852 sq.m	1,120 sq.m	+ 268 sq.m

4.0 Relevant Planning Policy

4.1 This section identifies key planning policy and guidance of relevance to the assessment of the proposals. An assessment of the proposed development against the policies set out below is provided in the subsequent Sections.

National Planning Policy

4.2 The National Planning Policy Framework (NPPF), originally published in March 2012 and last updated in December 2024, sets out the Government's overarching strategic planning policies for England and provides strategic direction on a range of planning matters.

4.3 It confirms that the purpose of the planning system is *"to contribute to the achievement of sustainable development"* (para. 7) to meet the requirements of both the existing population and future generations. Para. 8 sets out the three dimensions of sustainable development – economic, social and environmental. The NPPF identifies a presumption in favour of sustainable development (para. 10), and where development proposals accord with an up-to-date plan, they should be approved without delay (para. 11.c). One of the key elements for delivering sustainable development is to help build a strong, responsive and competitive economy (para. 8).

4.4 With regards to retail development, the NPPF refers to the sequential and impact tests. In terms of the sequential test, paras. 91 and 92 state:

"Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre 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.

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. Applicants and local planning authorities should 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."

4.5 In terms of impact, para 94 states:

"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 m2 of gross floorspace). This should include assessment of:

a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and

b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme)."

4.6 The NPPF confirms that where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in para. 94, it should be refused.

4.7 The Government is currently consulting on a revised NPPF and other changes to the planning system. The consultation requests comments on a draft NPPF document and seeks views on potential reforms to the sequential test. The consultation commenced on 16 December 2025 and closes on 10 March 2026. The draft NPPF currently holds no weight in the determination of planning applications considering its draft status.

Statutory Development Plan

4.8 Section 38(6) of the Planning and Compulsory Purchase Act 2004, states that where an adopted Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Plan, unless material considerations indicate otherwise.

4.9 The adopted Development Plan for LB Hillingdon comprises:

- The London Plan (March 2021);
- Hillingdon Local Plan Part 1 (adopted 2012) - Strategic Policies; and
- Hillingdon Local Plan Part 2 (adopted 2020) - Development Management Policies and Site Allocations and Designations.

The London Plan (2021)

4.10 Policy SD7 of the London Plan requires boroughs to take a town centres first approach when considering development proposals. In line with the NPPF, the policy states that Boroughs should:

"1) apply the sequential test to applications for main town centre uses, requiring them to be located in town centres. If no suitable town centre sites are available or expected to become available within a reasonable period, consideration should be given to sites on the edge-of-centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport. Out-of-centre sites should only be considered if it is demonstrated that no suitable sites are (or are expected to become) available within town centre or edge of centre locations. Applications that fail the sequential test should be refused

2) require 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"

4.11 Para. 2.7.4 advises that where edge-of-centre developments of retail, leisure and office uses are proposed, and are not in accordance with the Development Plan, these should be accompanied by a robust and detailed impact assessment. This applies to development greater than a locally set floorspace threshold, or 2,500 sq.m if a local floorspace threshold has not been set. The plan notes that an impact assessment may also be required where a proposal is likely to give rise to development at a scale not related to the role and function of a centre, such as a large retail store in or on the edge of a neighbourhood or local centre. Assessments should consider the impact on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal, and the impact on town centre vitality and viability.

4.12 Other London Plan policies of relevance to the Proposed Development are set out below, and assessed against at Section 7.0 of this Planning Statement.

- Policy GG2 (Making the best use of land)
- Policy D3 (Optimising Site Capacity Through the Design-Led Approach)
- Policy D4 (Delivering Good Design)
- Policy D5 (Inclusive Design)
- Policy D12 (Fire Safety)
- Policy D14 (Noise)
- Policy E11 (Skills and opportunities for all)
- Policy G5 (Urban Greening)
- Policy SI1 (Improving Air Quality)
- Policy SI2 (Minimising Greenhouse Gas Emissions)
- Policy SI5 (Water Infrastructure)
- Policy SI12 (Flood Risk Management)
- Policy T4 (Assessing and Mitigating Transport Impacts)
- Policy T5 (Cycling)
- Policy T6 (Car Parking)
- Policy T7 (Deliveries, Servicing and Construction)

Hillingdon Local Plan (Part 1 - 2012; Part 2 - 2020)

4.13 The Hillingdon Local Plan comprises two parts: the Hillingdon Local Plan Part 1 – Strategic Policies ('LPP1'; adopted 8 November 2012) and the Hillingdon Local Plan Part 2 – Development Management Policies and Site Allocations and Designations ('LPP2'; adopted 16 January 2020).

4.14 In terms of retail policy, LPP1 Policy E5 (Town and Local Centres) states that:

"planning decisions will be taken in accordance with the provisions of national guidance, particularly the sequential and impact tests. Further, more detailed policies will be outlined in the forthcoming Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document."

4.15 LPP2 Policy DMTC1 states:

"C) Proposals for 'main town centre uses' in out of centre locations will only be permitted where there is no harm to residential amenity.

D) The Council will:

i) expect proposals for 'main town centre uses' to demonstrate that there are no available or suitable sites in a town centre where an edge of centre or out of centre location is proposed, using a sequential approach; and

ii) consider the effect of the proposal, either individually or cumulatively on the vitality and viability of existing town centres. Development proposals in out of centre and edge of centre locations, which exceed 200 sqm of gross retail floorspace, or 1,000 sqm of combined main town centres uses, will require an impact assessment.”

4.16 Other Local Plan policies of relevance to the Proposed Development are set out below, and assessed against at Section 7.0 of this Planning Statement.

- Policy BE1 (Built Environment)
- Policy EM1 (Climate Change Adaptation and Mitigation)
- Policy EM6 (Flood Risk Management)
- Policy EM7 (Biodiversity and Geological Conservation)
- Policy EM8 (Land, Water, Air and Noise)
- Policy EM11 (Sustainable Waste Management)
- Policy T1 (Accessible Local Destinations)

4.17 Hillingdon Local Plan Part 2 - Development Management Policies and Site Allocations and Designations (2020):

- Policy DMHB 11 (Design of New Development)
- Policy DMEI 2 (Reducing Carbon Emissions)
- Policy DMEI 7 (Biodiversity Protection and Enhancement)
- Policy DMEI 9 (Management of Flood Risk)
- Policy DMEI 10 (Water Management, Efficiency and Quality)
- Policy DMEI 14 (Air Quality)
- Policy DMCI 7 (Planning Obligations and Community Infrastructure Levy)
- Policy DMT 1 (Managing Transport Impacts)
- Policy DMT 2 (Highways Impacts)
- Policy DMT 5 (Pedestrians and Cyclists)
- Policy DMT 6 (Vehicle Parking)

4.18 LB Hillingdon is currently preparing a new Local Plan. A Regulation 18 ‘call for views’ consultation was held 29 April - 24 June 2024. A second Regulation 18 consultation is anticipated late 2025, and the Regulation 19 consultation is anticipated to be held in Spring 2026. Given the preliminary stage in Local Plan preparation, the emerging Local Plan can only be afforded very limited weight at this stage and therefore the Proposed Development is not assessed against any draft Local Plan policies in this Planning Statement.

Summary of Retail Policy

4.19 The main policy considerations for the determination of planning applications for retail uses are compliance with a sequential test and retail impact, as set out in the NPPF (2024). The sequential test applies to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan, and an assessment of the proposals against this test is set out at Section 5.0.

4.20 Local Plan Policy DMTC1 establishes a threshold of 200 sq.m of gross retail floorspace for retail impact assessments. The proposed development will result in an increase of 826 sq.m GIA of additional retail floorspace at mezzanine level, and therefore a formal retail impact assessment has been undertaken at Section 6.0.

Planning Guidance

4.21 In addition to the Statutory Development Plan, the following documents are considered potentially relevant and material in determining the planning application:

National Guidance

1 National Planning Practice Guidance (PPG)

2 National Design Guide

Strategic Guidance (GLA)

1 GLA Shaping Neighbourhoods Accessible London: Achieving an inclusive environment SPD (2014)

2 GLA Fire Safety LPG (2022)

3 GLA Air Quality Positive LPG (2023)

4 GLA ‘Be Seen’ energy monitoring LPG (2021)

5 GLA Energy Assessment LPG (2022)

6 GLA Sustainable Transport, Walking and Cycling Guidance LPG (2022)

Local Guidance (LB Hillingdon)

1 Accessible Hillingdon SPD (2017)

2 Planning Obligations SPD (2014)

5.0 Retail Location and the Sequential Test

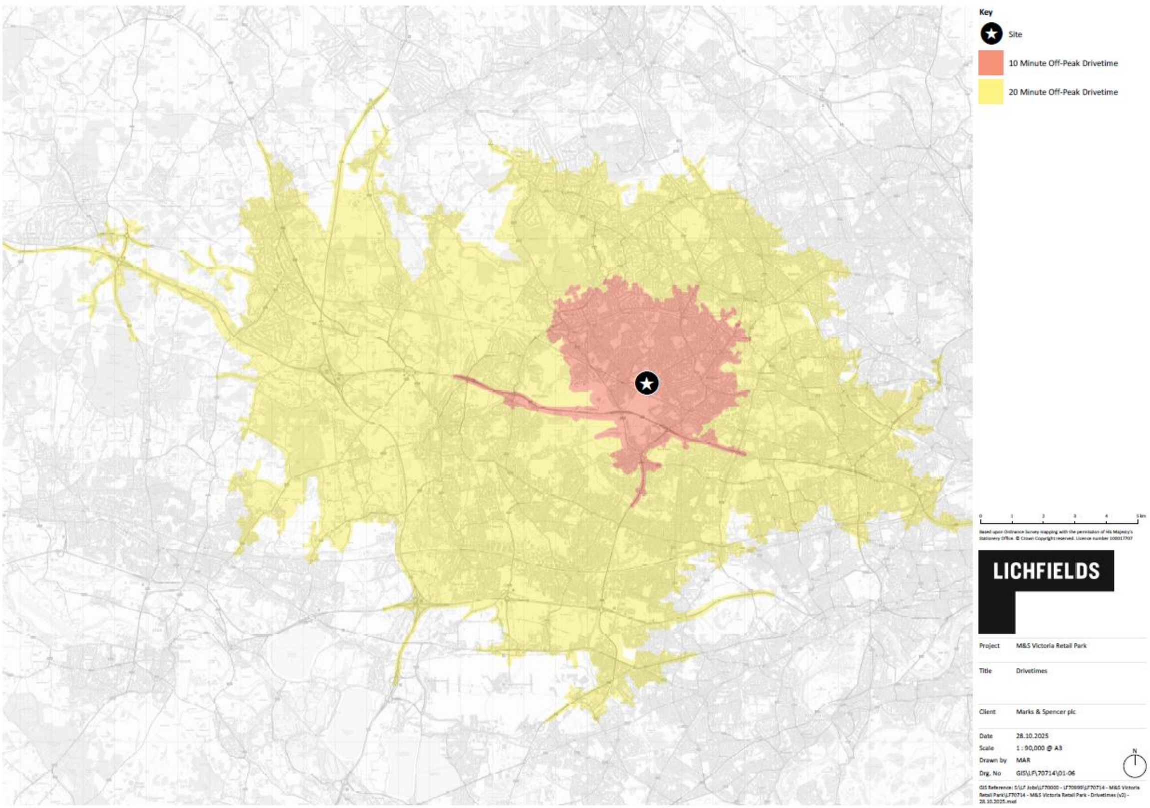
5.1 As identified above, the Site is in an out-of-centre location, and a sequential assessment has been undertaken in accordance with the requirements of the NPPF. This section considers the proposals in the context of the sequential test to site identification and assessment.

5.2 Para. 91 of the NPPF requires a sequential test for planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. In this respect, the NPPF states that applicants and LPAs should demonstrate flexibility on issues such as format and scale. The PPG notes that the application of the test will need to be proportionate and appropriate for the proposal.

Methodology

5.3 The sequential test should be limited to assessing locations that would serve a similar catchment as the proposed development site. The development will serve a primary catchment equating to approximately 10-minutes drivetime from the site. Figure 5.1 below demonstrates 10- and 20-minute drivetimes from the application site. Red shading indicated 10-minute off-peak drivetimes, yellow shading indicates 20-minute off-peak drivetimes.

Figure 5.1 10 and 20 Minute Off Peak Drivetimes



5.4 The designated centres within the 10-minute drive time are as follows:

- South Ruislip Local Centre (LB Hillingdon)
- Ruislip District Centre (LB Hillingdon)

- Ruislip Manor Minor Centre (LB Hillingdon)
- Eastcote District Centre (LB Hillingdon)
- North Hillingdon Local Centre (LB Hillingdon)
- North Harrow District Centre (LB Harrow)
- South Harrow District Centre (LB Harrow)
- Rayners Lane District Centre (LB Harrow)
- Northolt Neighbourhood Centre (LB Ealing)

5.5 For robustness, we have also assessed Uxbridge and Harrow which are large designated town centres outside of the 10-minute drive time. Harrow is in LB Harrow, and Uxbridge is in LB Hillingdon.

5.6 In order to perform the sequential test analysis for this application, we have therefore assessed the potential for sites within and on the edge of the above sites. Other out of centre sites have not been considered.

Interpretation of the Sequential Test

5.7 Disaggregation does not form part of retail planning policy, i.e. there is no requirement to split up the proposed development into smaller parts. The sequential test looks to see if there are suitable sites which can accommodate the broad type of development that is proposed in respect of the approximate (rather than precise) size, type and range of goods that are proposed. A development that is split into several disparate parts does not amount to approximately the same size or type of development. The requirement to assess sequentially preferable sites (plural) means in order to see whether any one (singular) of them can accommodate what is proposed, not to see whether a number of sites (plural) can accommodate parts or elements of what is proposed.

5.8 Previous policy and guidance made express reference to disaggregation, but those references have not been carried forward into current guidance. Neither the NPPF nor the PPG (which is where one would expect to see such clarification if it was considered necessary) make any reference whatsoever to disaggregation or sub-division. This was plainly a deliberate choice when formulating current policy.

5.9 A significant Judgement in respect of the sequential test is the Supreme Court Judgement in Tesco v Dundee City Council (21 March 2012)[1]. This Judgement is important as it is the first in a series of consistent interpretations of how disaggregation should be dealt with when considering retail development proposals. This Judgement is capable of application in England and Wales in addition to Scotland, albeit it interprets the sequential approach test in the context of Scottish planning guidance note NPPG 8 (1998) 'Town Centres and Retailing'.

5.10 Paragraph 29 of the Judgement conveys the interpretation that Lord Reed gives to the concept of flexibility, and provided the applicant has demonstrated flexibility with regards to format and scale, the question is:

[1] Supreme Court Judgement in Tesco v Dundee City Council (21 March 2012) Para 29/37

"whether an alternative site is suitable for the proposed development not whether the proposed development can be altered or reduced so it can be made to fit an alternative site".

5.11 The Judgement also conveys the interpretation that Lord Hope, who agrees with the conclusions of Lord Reed regarding the need for flexibility and realism, gives to the suitability of a potential alternative site (Paragraph 37):

"It is the proposal for which the developer seeks permission that has to be considered when the question is asked whether no suitable site is available within or on the edge of the town centre".

5.12 The Judgement is clear that an applicant must assess the scope for an alternative site to accommodate the proposed development, and in doing so there is a requirement to exercise a degree of flexibility. It is also clear that provided better located (in or edge of centre) sites are not suitable for the proposed development, that is the extent of the sequential test, as far as a legal reading of policy is concerned.

5.13 The sequential approach test is therefore interpreted as whether, given a reasonable degree of flexibility, a potential alternative site can accommodate the development proposed and not some alternative scheme that is materially different in purpose or is in a disaggregated form.

5.14 Rushden Lakes is an important Secretary of State decision (App/G2815/V/12/2190175) in 2014, in relation to an inquiry which took place shortly after the issue of (2012) NPPF, and therefore provided an early indication as to the proper approach to policy by the Secretary of State. The decision confirms that disaggregation is not a component of flexibility and that there is no requirement for an applicant/appellant to consider the disaggregation of a proposed development (para. 8.47 and 8.50). Para 8.49 of the Rushden Inspector's Report (IR) confirms that the NPPF provides no indication over the degree of flexibility required.

5.15 The conclusions of the Inspector were endorsed by the Secretary of State (para. 15) where he agrees that the sequential test relates entirely to the application proposal and whether it can be accommodated on an actual alternative site. The Secretary of State agrees (para. 16) that there is no requirement to disaggregate.

5.16 This issue was also dealt with in a Secretary of State decision (refs: APP/V2723/V/15/3132873 & APP/V2723/V/16/3143678) relating to out of centre retail and leisure development at Scotch Corner. The Inspector's recommendation (which was accepted by the SOS) concludes that disaggregation is not required in order to demonstrate flexibility. Paragraph 11.7 sets out that:

*"In carrying out the sequential test it is acknowledged that whilst Framework paragraph 24 indicates that applicants should demonstrate flexibility on issues such as format and scale, **it does not require the applicant to disaggregate the scheme**. The sequential test seeks to see if the application, i.e. what is proposed, can be accommodated on a town centre site or on sequentially preferable sites."* (emphasis added)

5.17 A further key decision relates to an Inspector's decision in relation to out of centre retail and leisure development at Tollgate in Colchester (Ref: APP/A1530/W/16/ 3147039). At Paragraph 12.3.4 of the Inspector's recommendation, it states:

"The sequential test within the NPPF should be interpreted without reference to old policy and guidance which mentioned disaggregation. Those references were not carried forward and neither the NPPF nor the PPG make any reference to disaggregation, or sub-division."

5.18 The Secretary of State's decision letter confirms this interpretation of the sequential test. At paragraph 13, it states that the alternative sequential site put forward by the Council and Rule 6 parties "would not be closely similar to the appeal scheme" and hence it was not suitable.

5.19 In the Aldergate Properties High Court case (2016), the Judge referred to suitability and availability and confirmed that "'suitable' and 'available' generally means 'suitable' and 'available' for the broad type of development which is proposed in the application by approximate size, type, and range of goods" (para. 35).

5.20 The above are important judgements/decisions when considering the interpretation of the sequential test.

5.21 There is no requirement for our sequential assessment to consider all other potential out of centre sites. While the NPPF (para. 88) states 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"*, this does not require an assessment of whether other sites may be *"better"* connected, only to demonstrate that the application site is *"well"* connected.

5.22 There are three levels in the hierarchy of sites in considering the sequential approach – 1. in town centres, 2. edge of centre sites; 3. out of centre sites. Sites that fall within the same category are afforded the same status in planning policy terms. This was clarified in the Secretary of State's decision at Tollgate (ref. APP/A1530/W/16/3147039) where it was concluded that in having equal status, an alternative edge of centre site was not sequentially preferable in policy terms:

IR para. 12.3.27: "St Botolph's is an edge of centre site and so in policy terms is not sequentially preferable and does not need to be considered."

SOS para. 14 "For the reasons given at IR12.3.27, the Secretary of State agrees with the Inspector that the St Botolph's is not sequentially preferable and does not need to be considered."

5.23 The Tollgate decision is clear that all edge of centre sites have equal status, and an assessment does not need to consider alternatives with the same status. This principle also applies to out of centre sites, as para. 88 of the NPPF referred to above relates to both edge and out of centre sites.

5.24 Applicants are therefore not required to consider all out of centre sites that may be better connected to the town centre than their proposal site. Applicants are only required to demonstrate their site is accessible and well connected to the town centre ie. not necessarily the most accessible and best-connected site.

Site Consideration

5.25 For sites to be suitable for retail use, they should:

- provide large, flexible floorplates with good ceiling heights;
- be located in prominent locations with good visibility; and
- provide good access to car parking to enable the store to serve customers.

5.26 While some limited flexibility is possible in terms of format and scale, the case law and appeal decisions referred to above have confirmed that a realistic approach should be taken, and that considerable weight should be afforded to the requirements of the applicant when considering the suitability of sequentially preferable sites.

5.27 For the purposes of the sequential assessment, and in order to demonstrate flexibility, we have looked at whether there are sites or vacant units that could accommodate the proposed floorspace (5,731 sq.m or up to around 10% less) that are available and suitable. For a site to accommodate a store of 5,731 sq.m GIA plus servicing and some car parking, it would need to be 1.4ha or more. However, even smaller sites (1.2ha and above) have been considered in this assessment, and vacant units/buildings up to 10% below the 5,731 sq.m the proposed net floorspace have been considered to ensure a robust analysis.

5.28 Car parks were reviewed during the site visit. However, these were all at least circa 50% full at the time of the visit and perform a valuable role. They are therefore not considered suitable for redevelopment.

5.29 An alternative site would need to be available within a reasonable period. The PPG advises that when considering what a reasonable period is for this purpose, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account. Assuming permission is granted by early 2026, allowing time for implementation of the planning permission, the units could be occupied later in 2026, therefore any alternative site would need to be available by the end of 2026 to be sequentially preferable.

5.30 The methodology adopted in identifying site availability is as follows:

- **Development plan**: to identify sites allocated for retail development within the town centre and any other centres;
- **Existing permissions and proposals**: to establish the existence of extant permissions and applications for retail development, through discussions with the local authority;
- **On the ground site survey**: to establish from a detailed site survey, sites or buildings with potential for development occupancy, such as cleared sites, undeveloped sites or redundant buildings.

5.31 Adopting the above approach enables the identification of all potential development sites. Should sites emerge, a thorough assessment is then made to establish their suitability and potential to accommodate a retail development.

5.32 The NPPF confirms that, in relation to retail development, the ‘centre’ constitutes the primary shopping area or centre boundary. Edge-of-centre sites are defined as being locations which are well connected and up to 300 metres from the Primary Shopping Area or centre boundary.

Assessment of Identified Sites

5.33 We have undertaken a thorough assessment of all sequentially preferable sites in or on the edge of the following centres which could potentially accommodate the Proposed Development:

1 South Ruislip
2 Ruislip
3 Ruislip Manor
4 Eastcote
5 North Hillingdon
6 North Harrow
7 South Harrow
8 Rayners Lane
9 Northolt
10 Uxbridge
11 Harrow

5.34 The sites that have been identified as potentially suitable or available are assessed in full in Appendix 1. Through this robust analysis, the conclusions of the sequential assessment are that there are no sites in any centres that are suitable or available to accommodate the proposed development.

5.35 Therefore, it is considered that the proposed development fully complies with the requirements of the NPPF in terms of the sequential test.

6.0 Retail Impact Assessment

6.1 As established in previous sections, the former Homebase unit is controlled by a condition that prevents the sale of food. The range of non-food goods that can be sold is not restricted in any way. Therefore, M&S could sell its range of non-food goods from the existing store without requiring planning permission. The amount of non-food sales floorspace will in fact decrease from the existing net sales area of 4,125 sq.m within the former Homebase unit to 2,445 sq.m within the proposed M&S store.

6.2 On this basis, the retail impact assessment is focused solely on the proposed 'food' sales from the unit. The proposed food hall within the M&S store will have a net sales area of 1,685 sq.m.

6.3 Para. 94 of the NPPF states that when assessing applications for retail and leisure development outside of town centres which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set threshold. Local Plan Policy DMTC1 establishes a threshold of 200 sq.m of gross retail floorspace for retail impact assessments.

6.4 As set out in para. 95 of the NPPF, where an application is likely to have a significant adverse impact on town centre vitality and viability or on existing, committed and planned public and private investment in a centre or in the catchment area of the proposal, it should be refused. All retail proposals have the potential to cause some impact on existing centres, but the relevant consideration is whether or not any impact caused can be considered as significantly adverse.

6.5 The PPG sets out the following steps that should be taken in applying the impact test:

1. establish the state of existing centres and the nature of current shopping patterns (base year);
2. determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur;
3. examine the 'no development' scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);
4. assess the proposal's turnover and trade draw (drawing on information from comparable schemes, the operator's benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw);
5. consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities (which may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact);
6. set out the likely impact of the proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues;
7. any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal's trade draw likely to be derived

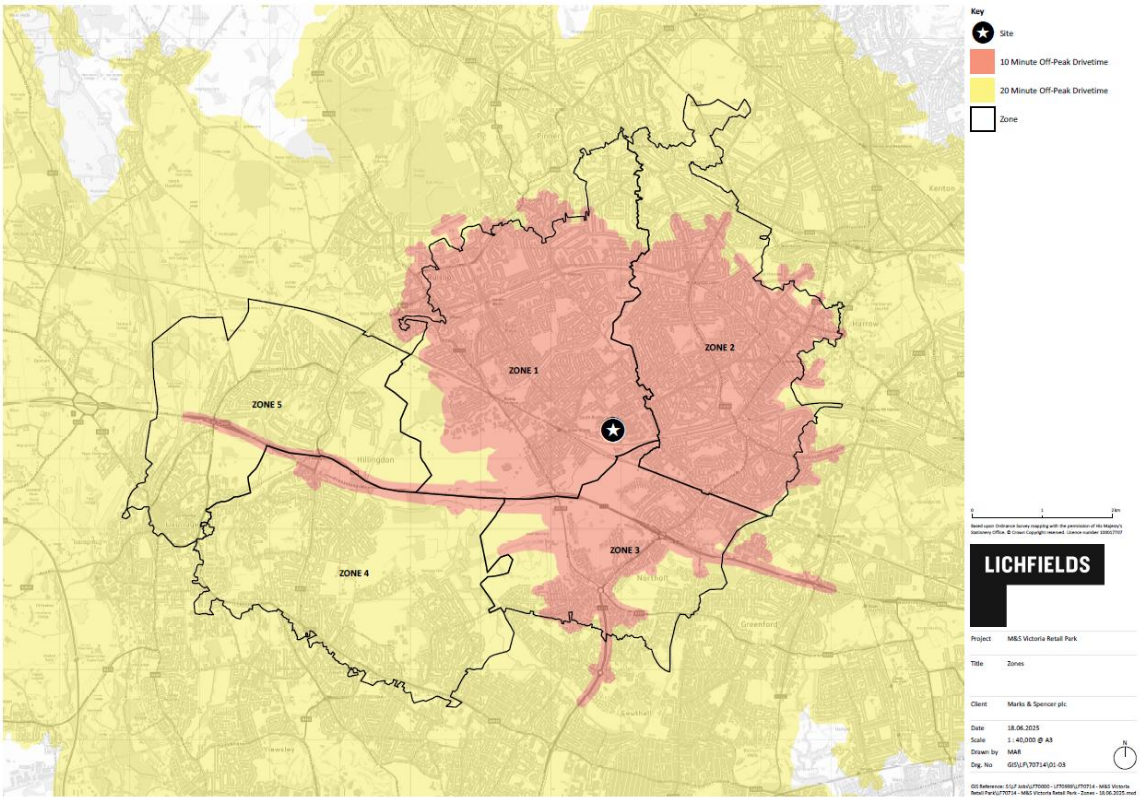
from different centres and facilities in the catchment area and the likely consequences for the vitality and viability of existing town centres.

Baseline Position

6.6 The Local Plan Part 2 Development Management Policies and Site Allocations and Designations, adopted in 2020, confirms that the Council's latest evidence is set out in the Convenience Goods Retail Study Update 2012.

6.7 Given the age of the Council's evidence base, and to ensure a robust assessment, we have commissioned a household survey from NEMS Market Research within the study area zones shown in Figure 6.1 below. The zones have been drawn based on population to enable representative results from each zone.

Figure 6.1 Study Area Zones



6.8 We have used up to date expenditure data from Experian and applied the latest forecast growth rates to model the results. This has ensured that the assessment of impact is robust and based on the most recent data.

6.9 For consistency, we have obtained updated population estimates for the study area from Experian (as shown in Table 1, Appendix 3).

6.10 Per capita convenience goods expenditure figures have also been obtained from Experian for 2023, which is the most recent data available. A reduction has been made for special forms of trading (SFT), i.e. spending not within stores such as internet shopping, and these figures are projected forwards using Experian's Retail Briefing Note 22 (March 2025), as shown in Table 2 in Appendix 3.

6.11 Total available convenience goods expenditure in the study area is shown in Table 3 in Appendix 3.

Retail Trends

6.12 Historic trends indicate that consumer expenditure has grown consistently in real terms, generally following a cyclical growth trend.

6.13 Experian's latest forecasts (published in March 2025) suggest slower expenditure growth and home shopping/internet spending is expected to grow at a much faster rate than traditional bricks and mortar shopping. Experian's immediate expenditure growth projections (2024, 2025 and 2026) for retail and leisure now reflect the expected effects of the cost-of-living crisis, which will suppress expenditure growth and the recovery from the effects of Covid-19 lockdowns in the short term.

6.14 This report has adopted Experian's latest published (March 2025) population and expenditure estimates for 2023, which reflect these recent trends. Experian's Retail Planner Briefing Note 22 (March 2025) suggests non-store retailing's market share increased from 17.8% in 2019 to 27.7% in 2021. Non-store sales (or special forms of trading, 'SFT') include all on-line sales and other forms of sales not generated from physical retail floorspace e.g. vending machines, party plan and deliveries. Experian's latest projections recommend relatively modest levels of growth in on-line shopping when compared with previous trends.

6.15 The cost-of-living crisis, including the high level of inflation, resulted in a reduction in retail expenditure per person during 2023, with many customers either trading down (buying cheaper products or using discount retailers) or cutting back (buying less products). Experian indicates a continued decline during 2024 and 2025. Low growth is predicted during 2026, but higher annual growth is expected in the longer-term.

6.16 For convenience goods, Experian's latest forecasts suggest a continued period of readjustment following high growth in expenditure experienced during the Covid-19 lockdowns in 2020. Convenience goods expenditure per capita is expected to continue to fall during 2025 and 2026. In the longer-term a small decline is forecast at -0.3% per annum between 2027 to 2031 and -0.2% per annum thereafter. Despite this forecast reduction in total expenditure per capita, Experian expects continued growth in non-store sales.

6.17 New forms of retailing (multi-channel and home shopping) have and will continue to grow. Home/electronic shopping and home delivery has increased with the growth in the use of personal computers, smart phones and the internet. Click and collect / click and return shopping has become more popular. Recent trends suggest continued steady growth in multi-channel activity.

6.18 In addition to new forms of retailing, retail operators have responded to changes in customers' requirements. Retailers have also changed their trading formats to include smaller convenience store formats capable of being accommodated within town and local centres (such as the Tesco Express/Metro, Sainsbury's Local, Little Waitrose and Marks & Spencer's Simply Food formats). Across the UK the number of Tesco Express, Sainsbury's Local and Little Waitrose stores increased significantly during the last decade.

6.19 There has been a move away from larger food superstores to smaller formats, reflecting changes in some customers' shopping habits i.e. more frequent but smaller food and grocery shopping trips rather than bulk food shopping. In line with these overall trends, the rapid expansion of European discount food operators Aldi and Lidl has continued. These discount operators are now competing more directly for market share with other main food store operators.

Spending Patterns

6.20 The market shares derived from the results of the household survey have been reproduced in Table 4 of Appendix 3 for convenience goods expenditure.

6.21 Based on these market shares, the estimated convenience goods turnover of stores and centres in 2023 and 2025 are shown in Tables 5 and 6 in Appendix 3.

6.22 As noted in the previous section, in view of the location, scale and nature of the proposed M&S store, the scheme will serve a primary catchment that equates to approximately a 10 minute off-peak drivetime from the site. This approximately equates to Zones 1, 2 and 3, which are considered to comprise the primary catchment, although there will be some inflow from beyond the primary catchment.

Health Checks

6.23 To inform the retail impact assessment, we have undertaken full health checks of the following defined centres within or just beyond a 10 minute off-peak drivetime of the application site:

1. South Ruislip
2. Ruislip
3. Ruislip Manor
4. Eastcote
5. North Hillingdon
6. North Harrow
7. South Harrow
8. Rayners Lane
9. Northolt
10. Uxbridge
11. Harrow

6.24 The centre health checks are set out in Appendix 2.

6.25 Within the 10 minute drivetime of the site, the centres are all relatively small but serve an important role providing for the local surrounding population. All of the centres offer a reasonable selection of convenience goods retailers, plus a limited comparison and service offer.

6.26 South Ruislip local centre is the closest centre to the application site, located approximately 500m to the north west. The centre includes South Ruislip station, which is served by both mainline railway and underground services, and the railway line dissects the centre. The centre has a very low vacancy rate, which indicates that it is healthy and viable. The centre is anchored by a Sainsbury's supermarket, which was noted to be busy during our site visit. To the north of the centre is the out of centre commercial area, which includes Asda, Lidl, B&M and Cineworld.

Design Year

6.27 Assuming that permission is granted for the proposed development in Spring 2026, we have adopted a design year of 2028, which allows time for the implementation of the planning permission and a settled trading pattern to be established. We have also assessed the future impact of the development in 2031.

'No Development' Scenario

6.28 The shopping patterns from the household survey results have been projected forward to 2028 and 2031, assuming no further development.

6.29 Convenience goods shopping patterns and turnover levels at 2028 are shown in Table 11 in Appendix 3. 2031 convenience goods turnover levels are shown in Table 12 of Appendix 3.

6.30 The effects of Covid-19 and the associated changes to forecast levels of growth show that there has been no growth between the baseline position, 2028 and 2031.

Turnover of the Proposed Development

6.31 As set out above, the retail impact assessment relates to the food hall element of the proposed new M&S store, which will have a net sales area of 1,685 sq.m. For the purposes of this assessment, we have assumed that 90% of the net sales area within the food hall will be for the sale of convenience goods, which will allow for a small amount of non-food goods to be sold, such as greeting cards and horticultural items. The Global Data 2025 estimates (February 2026) of the average turnover for M&S has been adopted and projected forwards to 2028, using the estimated increases in turnover efficiency from the Experian Briefing Note 22 (March 2025).

6.32 Table 8 in Appendix 3 and Table 6.1 below estimates that the convenience goods turnover of the proposed development will be £17.54 million in 2028.

Table 6.1: Convenience goods turnover of proposed development, 2028

	Convenience goods sales area (sq.m net)	Turnover (£ per sq.m)	Turnover (£m)
M&S Food Hall	1,517	£11,569	£17.54

Source: Global Data 2025 estimates (February 2026) (2023 prices)

Trade Draw

6.33 The trade draw of the proposed development (ie. the proportional amount of total turnover attracted from each study area zone) is primarily based on the existing trade draw of nearby facilities, particularly the Sainsbury's at South Ruislip, as estimated from the household survey results. Adopting a similar pattern of trade draw is considered to be a robust scenario in terms of trade diversion and impact on centres closest to the proposed development.

6.34 The convenience goods trade draw of the proposed development is shown in Table 9 of Appendix 3.

Commitments

6.35 Planning permission has been granted to allow the sale of food from the former Wickes and Halfords units at land off Harefield Road, Uxbridge (refs. 16299/APP/2023/3691 and 16299/APP/2024/32). One of the units is to be occupied by Aldi, with the other unit still to be let.

6.36 Table 10 in Appendix 3 estimates the turnover of this commitment in 2028, based on the information submitted with the planning applications. The average sales density for Aldi has been adopted for Unit A using the Global Data 2025 estimates (February 2026), for consistency. For Unit B, the average turnover for Aldi, Asda, Co-op, Iceland, Lidl, M&S Food, Morrisons, Sainsbury's, Tesco and Waitrose has been used.

6.37 We are not aware of any other commitments that need to be taken into account in undertaking our retail impact assessment.

Trade Diversion

6.38 The proposed development will have the effect of clawing back some of the expenditure that is currently going to centres and facilities outside of the Borough, which will be an overall benefit.

6.39 The location of the proposed development at Victoria Retail Park is not an isolated destination, as it is well connected to South Ruislip local centre, as well as to the surrounding residential areas. The proposed M&S store will provide a complementary offer to the existing centres, and will not offer the same range of goods. While there will be some overlap, there will still be a requirement for customers to visit other centres to meet their retail and service needs that cannot be met by the proposed development.

6.40 Given the nature of the location of the proposed M&S store and the number and dispersion of existing stores and facilities, some of the turnover of the new store will be diverted from a number of other destinations both within and outside the survey area. We have therefore focused on the main stores from which we estimate the majority of the trade will be diverted.

6.41 The majority of trade will be diverted from existing supermarkets, particularly the existing M&S stores in Pinner, Harrow and Uxbridge, and other supermarkets including Sainsbury's at South Ruislip and the nearby out of centre Asda, Aldi and Lidl stores.

6.42 For the existing M&S store in Uxbridge, we have made an adjustment to the store's turnover to take account of the estimated trade diversion to the commitment on the edge of the town centre, which comprises Aldi and a second store. The Planning Statement submitted with application refs. 16299/APP/2023/3691 and 16299/APP/2024/32 forecast that 2.1% of the turnover of the new development would be diverted from the M&S store, which equates to £0.47 million in 2028.

6.43 Table 13 in Appendix 3 and Table 6.2 below show the estimated trade diversion and forecast levels of impact of the proposed development on existing stores in 2028. The benchmark turnover of the existing stores is set out in Table 7 of Appendix 3.

Table 6.2: Convenience goods forecast trade diversion, 2028

Centre/Facility	Turnover 2028 (£m)	M&S South Ruislip Trade diversion 2028		Turnover 2028 with M&S South Ruislip (£m)	Impact 2028 (%)
		% scheme turnover	£m		
Sainsbury's, Long Drive, South Ruislip	45.39	22.5%	3.95	41.45	-8.7%
Aldi, Victoria Road, South Ruislip (OOC)	12.87	2.0%	0.35	12.51	-2.7%
Lidl, Victoria Road, South Ruislip (OOC)	9.48	4.0%	0.70	8.78	-7.4%
Asda, Old Dairy Lane, South Ruislip (OOC)	33.27	17.5%	3.07	30.20	-9.2%
Waitrose, Kingsend, Ruislip	28.78	7.5%	1.32	27.47	-4.6%
M&S Simply Food, Bishops Walk, Pinner	13.66	7.5%	1.32	12.34	-9.6%
Sainsbury's, Barters Walk, Pinner	38.43	5.0%	0.88	37.55	-2.3%
Waitrose, Northolt Road, South Harrow (OOC)	19.50	3.5%	0.61	18.89	-3.1%
M&S, High Street, Uxbridge [1]	14.61	5.0%	0.88	13.74	-6.0%
Other Uxbridge Town Centre [2]	32.25	0.0%	0.00	32.25	0.0%
Uxbridge Town Centre sub-total	**46.87**		**0.88**	**45.99**	**-1.9%**
M&S, St. Anns Road, Harrow	7.21	3.0%	0.53	6.69	-7.3%
Other Harrow Town Centre [3]	26.84	0.0%	0.00	26.84	0.0%
Harrow Town Centre sub-total	**34.06**		**0.53**	**33.53**	**-1.5%**
Other stores		22.5%			
TOTAL		**100.0%**	**17.54**		

Notes: [1] Adjustment made to turnover of M&S in Uxbridge Town Centre to take account of estimated trade diversion from commitment at Harefield Road

6.44 Table 6.2 shows that it is estimated around 22.5% of the turnover of the new M&S store will be diverted from the Sainsbury's store at South Ruislip, resulting an impact of -8.7% on this store. The results of the household survey show this this store is currently trading well, at around 25% above benchmark. As a result of the trade diversion to M&S, the store is expected to continue to trade well at around 14% above benchmark. This level of impact is not considered to be a significant adverse impact.

6.45 The health check of South Ruislip identifies that this is a small, but healthy and viable centre with a very low vacancy rate, providing an important retail role to local residents. The centre will continue to perform this role with the forecast limited trade diversion to the M&S store. The centre is also likely to benefit from linked trips from customers visiting the M&S store who will also choose to use the nearby stores and facilities within South Ruislip.

6.46 Trade is also forecast to be diverted from the existing Lidl, Aldi and Asda stores on Victoria Road/Old Dairy Lane, South Ruislip. These stores are in out of centre locations, and are not protected by planning policy. It should also be noted that the Aldi and Asda stores are estimated to be trading above benchmark levels, and will continue to trade above benchmark following the forecast trade diversion.

6.47 Some trade is expected to be diverted from the Waitrose in Ruislip district centre, resulting in an estimated impact of -4.6%. The results of the household survey show that this store is currently trading very well at around 63% higher than benchmark turnover. Following the forecast trade diversion, this store is expected to continue to trade around 55% above benchmark. This level of impact is therefore considered to be low, and it should also be noted that impact on Ruislip district centre as a whole will be even lower.

6.48 A limited amount of trade is also forecast to be diverted from the out of centre Waitrose at South Harrow. As noted above, as this store is in an out of centre location, it is not protected by planning policy.

6.49 While the existing M&S stores at Pinner, Uxbridge and Harrow are not the closest stores to the proposed development, and are all located beyond the 10 minute drivetime, it is likely that customers using existing M&S stores will utilise the new facility at South Ruislip.

6.50 The existing M&S Simply Food in Pinner town centre is trading very well, and following the diversion to the proposed new store, will continue to trade around 52% above benchmark. A small amount of trade is also estimated to be diverted from the Sainsbury's store in Pinner town centre, and this store is estimated to continue trading around 43% above benchmark following the trade diversion to the new M&S store. The impact on these stores is therefore considered to be low, and the impact on Pinner town centre as a whole will be even lower.

6.51 The existing M&S food hall in Uxbridge is also estimated to be trading very well and significantly above benchmark. As noted above, an adjustment has been made to its turnover to allow for trade diversion to the retail development at Harefield Road. The existing M&S store in Uxbridge is a full line store with a food hall, and it will continue to trade well with the forecast level of trade diversion on its convenience goods turnover. As shown in Table 6.2 above, the impact on the convenience goods turnover of Uxbridge town centre as a whole, will be just -1.9%. The estimated turnover of the centre includes the Lidl, Tesco and Iceland stores, but does not include other small or independent convenience retailers, and as such, the actual impact on Uxbridge town centre would be even lower.

6.52 In terms of impact on the existing M&S food hall in Harrow, following the forecast trade diversion to the new M&S store, the food hall is expected to trade just above benchmark level. The proposed impact on the store is therefore not considered to be significantly adverse. The existing M&S store in Harrow is a full line store with a small food hall, which will continue to trade well with the forecast level of trade diversion on its convenience goods turnover. As shown in Table 6.2 above, the impact on the turnover of Harrow town centre as a whole, which contains a number of other convenience goods stores including Morrisons and Lidl, will be just -1.5%. As with Uxbridge, the turnover of Harrow town centre does not include other small or independent convenience retailers, and the overall impact on Harrow town centre would be even lower.

6.53 Generally, facilities will compete on a like for like basis, and we expect trade to primarily be drawn from the existing supermarkets. Smaller units within the existing centres already compete effectively with the existing out of centre facilities. We consider that there is no reason why these units should not continue to trade well in the face of competition from the proposed scheme.

6.54 The convenience goods impact on all other stores and centres within the survey area is estimated to be very low.

6.55 Table 14 in Appendix 3 provides a summary of forecast trade diversion and impact in 2031. Given the limited growth in expenditure estimated by Experian, there is no real change in terms of the impacts estimated in 2028 and 2031.

Impact on Vitality and Viability and Planned Investment

6.56 In terms of the impact tests set out in the NPPF, this level of trade diversion needs to be considered in terms of the:

1 impact on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and

2 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).

6.57 The estimated levels of trade diversion would not have a significant adverse impact in the context of the above tests. The forecast convenience trade diversion needs to be considered in the context of the relative strength of South Ruislip and the other nearby centres within the 10 minute drivetime.

6.58 The first test relates to impact on planned/committed investment. There are no planned investments in any of the centres assessed which would be affected by the application proposals.

6.59 There are no extant commitments for additional retail floorspace in or around any of the centres within the 10 minute drivetime which need to be taken into consideration in terms of potential impact on planned investment. The assessment above takes into account the commitment for an edge of centre scheme in Uxbridge, where a new Aldi is expected to open shortly. As an edge of centre proposal, this investment would not be protected by planning policy.

6.60 In terms of the second test, the health checks demonstrate that all of the centres currently trade well and are not considered to be vulnerable to the type of retail unit proposed. There are a number of stores which sell a range of products within the centres and the level of impact on any individual trader is likely to be limited. Smaller units within the centres already compete effectively with other existing centres and out of centre facilities. We consider that there is no reason why these units should not continue to trade well in the face of competition from the proposed scheme.

6.61 In this respect the existing nearby centres would be mostly unaffected by the proposals. The application proposals would not significantly change the shopping patterns and our quantitative analysis raises no concerns regarding the future trading of stores within any centre.

6.62 As the closest centre to the application site, the convenience goods offer in South Ruislip primarily comprises the Sainsbury's supermarket, and there are no other units within the centre that are likely to compete with the proposed M&S. The health check of South Ruislip confirms that it is a vital and viable centre with a very low vacancy level. The Sainsbury's supermarket trades very well alongside competition from the out of centre stores located to the north of the centre, and will continue to do so following the opening of the M&S store. The additional M&S food offer would in no way prejudice the long term viability of South Ruislip.

6.63 It is clear that as well as the overall impact levels being limited, the trade diversion will be split between a number of retailers. While there will be some trade diversion from existing stores within centres, this is not significant in the context of their current trading levels. None of these retailers would be affected to the extent that their future trading level would be prejudiced.

6.64 As noted above, the proposed development will bring a new retailer into the local area, adding to the overall retail offer, and clawing back some of the expenditure that is currently going to centres and facilities outside of the Borough, which is an overall benefit. There are also likely to be linked trips from customers visiting the M&S store who will also choose to use the stores and facilities within South Ruislip, which will benefit the centre. As set out elsewhere within this Planning and Retail Statement, there will be other associated benefits of the proposed development, including local job creation.

6.65 In light of the above, we do not consider that the proposed scheme raises any concerns in terms of the cumulative impact upon any nearby centre.

Conclusion on Retail Impact

6.66 The former Homebase unit is controlled by a condition that prevents the sale of food. The retail impact assessment is focused solely on the proposed 'food' sales from the unit. The proposed food hall within the M&S store will have a net sales area of 1,685 sq.m.

6.67 The proposed development falls below the NPPF threshold for requiring a retail impact assessment of 2,500 sq.m gross, however Local Plan Policy DMTC1 establishes a threshold of 200 sq.m of gross retail floorspace for retail impact assessments.

6.68 The above assessment considers the extent to which the forecast retail turnover of the proposed development will impact upon the vitality and viability of the existing stores and centres in the vicinity of the site. The estimated levels of impact forecast on existing stores and centres is not considered to be significantly adverse.

6.69 The analysis concludes that the role and function of South Ruislip and other nearby centres would not be undermined as a result of the proposed development. There would therefore not be any harm to the vitality and viability of the centres in terms of the considerations of the NPPF.

6.70 In conclusion, the proposals fully accord with the NPPF and Local Plan policy.

7.0 Assessment of Other Planning Matters

7.1 This section sets out an assessment of the relevant planning issues associated with the Proposed Development. The following areas are considered specifically relevant to this application:

1 Principle of Development
2 Design
3 Employment
4 Highways, Access and Parking
5 Air Quality
6 Biodiversity
7 Energy and Sustainability
8 Fire Strategy
9 Flood Risk and Drainage
10 Noise
11 Refuse & Recycling

Principle of Development

7.2 The existing lawful use of Unit 1 is Class E(a) (formerly Class A1), established by appeal decision ref. APP/R5510/A/93/226535. No change of use is proposed. The full planning application seeks planning permission for the continued Class E(a) retail use of the store, including floorspace for food sales.

7.3 In retail policy terms, the principle of the proposed increase in floorspace and use for food sales is considered above through the sequential test and retail impact assessment (Section 5.0 and Section 6.0) and demonstrated as acceptable.

7.4 No part of the site is listed or represents any heritage value. The physical works proposed to the Unit include the demolition of the former Homebase garden centre area and lean-to structure attached to the east elevation the Unit. Whilst re-use, refurbishment and adaptations are relevant considerations at the inception of new development proposals, the existing garden centre area and lean-to structure are not suitable for retention to allow for the proposed occupation of Unit 1 by M&S.

7.5 The NPPF promotes the efficient use of land, stating that planning policies and decisions should give substantial weight to the value of using suitable brownfield land for identified needs (para. 124 and para. 125). NPPF para. 85 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity. London Plan Policy GG2 (Making the best use of land) states that those involved in planning and development must enable development of brownfield land, prioritising sites which are well-connected by existing or planned public transport.

7.6 Overall, the Proposed Development would safeguard Unit 1 for long-term continued retail use to meet the needs of both new and existing South Ruislip residents, whilst also delivering a suite of high-quality design and architectural improvements at Unit 1, Victoria Retail Park. The Proposed Development and delivery of a full-line M&S store at Victoria Retail Park has been subject to pre-application engagement with LB Hillingdon senior staff, and the application site is considered a prime candidate for sustainable refurbishment.

Design

7.7 Policy at all levels requires high quality design. The NPPF highlights that the creation of high-quality places is fundamental to the planning and development process, and states that *"good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities"* (para. 131). Furthermore, para. 135 encourages developments to be sympathetic to local character and establish a strong sense of place.

7.8 NPPF para. 129 states that decisions should support development that makes efficient use of land, taking into account (inter alia) the desirability of promoting regeneration and change, and the importance of securing well-designed, attractive and healthy places.

7.9 London Plan Policy D3 (Optimising site capacity through the design-led approach) states that development proposals should be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.

7.10 As part of the design-led approach, development proposals should facilitate efficient servicing and maintenance of buildings, have due regard to existing and emerging building hierarchy and achieve safe, secure and inclusive environments.

7.11 LPP1 Policy BE1 (Built Environment) states that all new development should achieve a high-quality design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place. Development should be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area.

7.12 LPP2 Policy DMHB11 (Design of New Development) states that all development should harmonise with the local context by taking into account the surrounding scale of development, considering the height, mass and bulk of adjacent structures. Development should also incorporate principles of good design using high quality building materials and finished and ensuring that the design maximises sustainability.

7.13 As set out in the accompanying Design and Access Statement, prepared by Brooker Flynn architects, the design rationale for the Proposed Development is to ensure the retail unit is fit for long-term occupation by M&S. The existing retail unit provides minimal contribution with respect to the character and appearance of the surrounding area, with no architectural qualities of significant merit. The external condition and aesthetic of the retail unit is in poor condition in parts, including weathered façade cladding and redundant architectural features. Overall, it is considered the unit requires significant enhancements to meet contemporary retailer expectations regarding appearance, legibility and design quality.

7.14 The proposed refurbishment of Unit 1 represents a high-quality design utilising a contemporary and refined material palette, consistent with M&S brand identity to create a premium and welcoming customer environment. High-performance white cladding panels will replace the existing weatherboarding to modernise the facades, with low level brickwork painted black. New emergency exits and service access doors are to be finished in black to complement the painted brickwork, whilst the plant area will be screened with fencing. Increased glazing will improve natural light into the retail unit and further activate the retail frontage. Removal of the mansard roof and entrance pods will simplify the architectural form.

7.15 The proposed improvements to the elevations and façade treatment of Unit 1 are considered a significant betterment in design terms and would represent a clear positive contribution to the townscape of the local area in accordance with LPP1 Policy BE1 and LPP2 Policy DMHB11. Further, the proposed refurbishment is considered to future-proof Unit 1 for long-term retail use in accordance with London Plan Policy D3, proposing high quality and robust materials that are commensurate to the wider setting of Victoria Retail Park and are appropriate for the building lifespan.

7.16 Overall, the Proposed Development is considered to be of high-quality design in line with national, strategic and local policy and guidance.

Employment

7.17 London Plan Policy E11 (Skills and opportunities for all) states that development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases.

7.18 The proposed store will generate a number of high-quality job opportunities for local people across a range of roles providing opportunities for training and career progression, as well as a number of other incentives and benefits including competitive salary levels, staff discount schemes, bonuses and other associated benefits. It is anticipated at this stage that the proposed M&S full line store will create up to 123 new jobs in a range of full and part time roles.

7.19 As detailed in the submitted Operator Statement, if planning permission is granted and implemented, M&S would recruit as many of the staff required to work in the store as possible from the local area. This is company policy with all new store openings; it meets both M&S' operational requirements and is consistent with 'Plan A' Climate Change targets. A local targeted advertising campaign prior to the store opening will ensure that all potential employees from the local area are reached.

7.20 M&S also has a defined career path available to new starters which will allow them to progress through the organisation should they wish. There are a range of internal development programmes and apprenticeship programmes available to support individuals develop their skills, knowledge and experience to develop in their current role or progress into a management position. Staff are given significant training and development opportunities, and M&S promotes a blend of on the job coaching and workshops to develop the individual's skills and experience.

7.21 M&S has devised 'Marks & Start' which is a work placement programme which helps people who face barriers getting into work. The three key groups the programme is aimed at are:

- single parents;
- people with disabilities or health conditions; and
- people who are homeless or at risk of homelessness.

7.22 M&S also supports veterans, service leavers and ex-offenders into work through the employability programmes run with partners.

7.23 Overall, the creation of approximately 123 new jobs and the associated M&S initiatives and programmes are considered to represent clear public benefits for the local economy and local community in accordance with London Plan Policy E11 and LPP1 Policy E7, and together comprise a material consideration in determination of this application.

Highways, Access and Parking

7.24 The application site is an established retail location, which is accessible by sustainable means of transport, including public transport, walking and cycling.

7.25 NPPF para. 115 advises that in making decisions, local planning authorities should take account of whether opportunities for sustainable transport modes are prioritised, safe and suitable access to the site can be achieved for all users, and any significant operational and highway safety impacts can be cost effectively mitigate to an acceptable degree.

7.26 NPPF para. 116 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

7.27 London Plan Policy D5 (Inclusive Design) expects development proposals to achieve the highest standards of accessible and inclusive design. LPP1 Policy T1 (Accessible Local Destinations) states that all development should encourage access by sustainable modes and include good cycling and walking provision. LPP2 Policy DMT1 (Managing Transport Impacts) requires development proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner. Development proposals are required to:

> *"i) be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development;*
>
> *ii) maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users;*
>
> *iii) provide equal access for all people, including inclusive access for disabled people;*
>
> *iv) adequately address delivery, servicing and drop-off requirements; and*

v) have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network."

7.28 LPP2 Policy DMT5 (Pedestrians and Cyclists) states that development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network. LPP2 Policy DMT6 (Vehicle Parking) requires all car parks provided for new development to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council's Accessible Hillingdon SPD.

Trip Generation

7.29 A Healthy Streets Transport Assessment has been prepared by Caneparo Associates to accompany the full planning application.

7.30 Section 6.0 of the Transport Assessment provides an assessment of the predicted traffic generation for the Proposed Development based on the introduction of food retail floorspace at the site. The net change in trip generation is calculated as 95 no. additional vehicle trips in the PM peak hour, and 126 no. additional vehicle trips during the Saturday peak hour. It is noted that this assumes that all trips are new to the network, whereas in reality they would have simply be diverted, linked or transferred trips. Therefore, the Transport Assessment considers the net number of 'new' trips to equate to 24 additional vehicle trips in the PM peak hour, and 32 no. additional vehicle trips during the Saturday peak hour. This equates to approximately one vehicle less than every three minutes in the PM peak hour and one every two minutes in the Saturday peak hour. This level of trip generation is considered to be non-material in highways impact terms.

Vehicle Parking

7.31 Parking surveys were undertaken on Friday 4 July 2025 and Saturday 5 July 2025 to understand the existing car park utilisation rates at Victoria Retail Park. The accompanying Transport Assessment demonstrates that the peak parking demand was recorded at 26% occupancy rate, demonstrating that there is more than sufficient capacity to accommodate any potential future demand associated with the introduction of food retail floorspace at the site. When assessed against anticipated parking demand associated with the Proposed Development, the Transport Assessment demonstrates that there will still be over 188 available spaces in the west Victoria Retail Park car park at peak occupancy.

7.32 Principally, the removal and replacement of 13 no. standard car park spaces will allow for a net increase of two trolley bays, two disabled parking spaces and seven parent and child ('P&C') parking spaces. In total, the Proposed Development will therefore only result in a net reduction of four parking spaces, comprising a re-allocation of on-site parking towards specialist provision (disabled and P&C) to enhance the accessibility of the retail unit for all users, in accordance with the inclusive design principles of LPP1 Policy D5, LPP2 Policy DM6 and the Accessible Hillingdon SPD. In this context, the net loss of four car parking spaces is considered wholly acceptable.

Cycle Parking

7.33 Currently no cycle parking is provided at the site. The Proposed Development provides 34 no. new cycle parking spaces along the frontage of Unit 1 in the form of 17 no. Sheffield stands, which is considered a significant benefit of the proposed development. The accompanying Transport Assessment demonstrates that the proposed cycle parking provision is in accordance with London Plan standards based, as the Proposed Development will generate demand for 33 additional spaces based on the inclusion of 2,189 sq.m GIA food sales retail floorspace at the site.

7.34 Overall, the introduction of cycle parking provision is considered to enhance the store's accessibility via sustainable modes of travel, aligning with the design principles of London Plan Policy D5, LPP1 Policy T1, LPP2 Policy DMT 1 and the Accessible Hillingdon SPD.

Draft Travel Plan

7.35 LPP1 Strategic Objective 12 seeks to reduce the reliance on use of the car by promoting safe and sustainable forms of transport, such as improved walking and cycling routes and encouraging travel plans. A Draft Travel Plan has been prepared by Caneparo Associates, setting out the preliminary strategy for staff, visitor and customer travel to the site to encourage sustainable modes of transport and minimise reliance on the private car.

7.36 Whilst the Site's PTAL rating is 2, the Draft Travel Plan demonstrates that the site is suitably located within walking distance to both national rail and underground services, as well as several bus stops. An Active Travel audit for the site is included within the Draft Travel Plan, identifying key routes in the locality based on Transport for London's adopted Healthy Streets Transport Assessment guidance. Through implementation of measures set out in the draft Travel Plan, it is considered that active travel opportunities at the site can be prioritised, minimising unnecessary vehicular trips associated with the Proposed Development in accordance with LPP1 SO12.

Air Quality

7.37 London Plan Policy SI 1 states that development proposals should not lead to further deterioration of existing poor air quality. Development proposals should, as a minimum, be Air Quality Neutral, and use design solutions to prevent or minimise increased exposure to existing air pollution.

7.38 Local Plan Policy DMT 2 (Highways Impacts) states that development proposals must ensure that they do not contribute to the deterioration of air quality.

7.39 LPP2 Policy DMEI 14 (Air Quality) reiterates the London Plan Policy SI 1 requirement, stating that development proposals should, as a minimum:

"i) be at least air quality neutral;

ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and

iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area."

7.40 Unit 1 is located approximately 300m north east of the LB Hillingdon AQMA boundary AQMA designated under LPP2 Policy DMEI 14 (Air Quality), which follows the Chiltern-Marylebone railway line south-west of Victoria Retail Park.

7.41 The accompanying Air Quality Assessment (AQA) has been prepared by RPS to assess any impacts arising from fugitive dust emissions during the construction phase and potential air quality impacts during the operational phase.

7.42 Impacts such as dust generation are predicted to be of short duration and only relevant to the construction phase of the development. In accordance with Mayor of London Control of Dust and Emissions during Construction and Demolition SPG, the construction dust impacts are indicated to be 'medium' prior to implementation of mitigation and controls. Following implementation of mitigation measures set out in the accompanying AQA, the associated impacts are considered to be 'minimised', in accordance with the Mayor of London's SPG.

7.43 With respect to the operational phase of the development, detailed atmospheric dispersion modelling has been undertaken in the accompanying AQA. The operational impact of the M&S South Ruislip development on existing receptors in the local area is predicted to be 'negligible' taking into account the changes in pollutant concentrations and absolute levels. On this basis, the accompanying AQA demonstrates that the resulting air quality effect of the Proposed Development is considered to be 'not significant'. In accordance with London Plan Policy SI 1 and LPP2 Policy DMEI 14, an accompanying Air Quality Neutral Calculation is included at Appendix B of the AQA.

7.44 Overall, the accompanying Air Quality Assessment demonstrates the proposal has been appropriately designed in accordance with the air quality neutral objectives of the London Plan SI 1 and LPP2 Policy DMEI 14 (Air Quality).

Biodiversity

7.45 Section 15 of the NPPF relates to Conserving and Enhancing the Natural Environment. NPPF para 187 states that when determination planning application, local planning authority decisions should (inter alia) minimise impacts on and provide net gains for biodiversity.

7.46 LPP1 Policy EM7 (Biodiversity and Geological Conservation) sets out the overarching aims to preserve and enhance Hillingdon's biodiversity and geological conservation. LPP2 Policy DMEI7 (Biodiversity Protection and Enhancement) states that if development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects.

7.47 The site comprises entirely developed land and sealed surfaces. The wider retail park car park includes small amounts of introduced shrubs and low-level planting, along with a series of individual trees.

7.48 With respect to urban greening and the requirements of London Plan Policy G5, the full planning application seeks continued retail use of an existing retail unit. There is no scope to provide landscaping on site, given that the application site comprises entirely the existing building and sealed surfaces immediately outside the store. In this respect, the provisions of London Plan Policy G5 are not considered applicable.

7.49 Under the Town and Country Planning Act 1990, the Government introduced a mandatory requirement for developers to deliver 10% biodiversity net gain on major sites from 12 February 2024. This was expanded to include small sites from 2 April 2024. Some exemptions apply including if the development is below the stated threshold (i.e. does not impact a priority habitat and impacts less than 25 sq.m of onsite habitat and 5 m of onsite linear habitats such as hedgerows).

7.50 The Proposed Development does not impact a priority habitat and impacts less than 25 sq.m of onsite habitat and 5 m of onsite linear habitats such as hedgerows. As a result, the development is exempt from the mandatory 10% biodiversity net gain requirement as it is below the stated threshold. A Biodiversity Assessment and associated metric is not submitted as part of the application. An accompanying Biodiversity De Minimis Exemption Statement has been prepared by Lichfields.

7.51 In summary, the Proposed Development comprises the reconfiguration of an existing retail unit and the site comprises entirely built development and sealed surfaces. The Proposed Development is not considered to result in ecological impacts and is exempt from the statutory biodiversity net gain requirement. On this basis, the Proposed Development is considered to be acceptable in biodiversity terms.

Energy and Sustainability

7.52 Chapter 9 of the London Plan requires the highest standards of sustainable design and construction to be used to improve the environmental performance of new developments and to ensure they can adapt to the effects of climate change over their lifetime. London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires a minimum on-site reduction of at least 35 per cent beyond Building Regulations for major development. Non-residential development should achieve 15 per cent through energy efficiency measures.

7.53 LPP1 Policy EM1 (Climate Change Adaptation and Mitigation) reiterates the requirements of new development to meet the carbon reduction target savings set out in the London Plan. LPP2 Policy DMEI 2 (Reducing Carbon Emissions) states that all major development proposals must be accompanied by an Energy Statement to demonstrate how these reductions will be achieved.

7.54 Hoare Lea has prepared an Energy and Sustainability Strategy to assess the predicted energy performance and carbon dioxide emissions for the Proposed Development using the London Plan's energy hierarchy (Policy SI 2):

- **Be Lean**: use less energy and manage demand during operation;
- **Be Clean:** exploit local energy resources and supply energy efficiently and cleanly;
- **Be Green:** maximise opportunities for renewable energy by producing, storing and using renewable energy on-site; and
- **Be Seen**: monitor, verify and report on energy performance.

7.55 The accompanying Energy and Sustainability Strategy demonstrates that the following emission reductions could be achieved by the Proposed Development:

- **Be Lean:** Up to 43.4% reduction over existing building through passive and energy efficiency measures alone;
- **Be Clean**: No heat network connection – no further reduction;
- **Be Green:** Up to an additional 4% reduction through potential high efficiency systems; and
- **Be Seen:** Inclusion of necessary metering, energy monitoring and data processes to facilitate annual reporting requirements.

7.56 The proposed energy strategy utilises a fabric first approach that maximises efficiency through retained fabric thermal performance and low U-value glazing solutions to minimise heat losses in winter and maximise cool retention in summer months. The site is not within the vicinity of any existing district heat networks, and the full planning application seeks continued retail use of an existing retail store. Therefore, potential for a future connection of the building to local district energy networks is not considered applicable. A high efficiency centralized air-based system is proposed to provide space heating and cooling to the foodhall, whilst a split system is proposed for the clothing and home areas. Effective energy metering will be enabled by the provision of suitable infrastructure within the building's services systems, including exhaustive metering of all energy usage in the facility.

7.57 Cumulatively, the Proposed Development is predicted to achieve 47.3% reduction in emissions over Building Regulations Part L (2021), in accordance with London Plan Policy SI 2, LPP1 Policy EM1 and LPP2 Policy DMEI 2. Further detail regarding Part L (2021) compliance is set out in the accompanying Sustainability Stage 2 Report – Part L 2021, prepared by Hoare Lea.

7.58 With respect to water usage, London Plan Policy SI 5 (Water Infrastructure) expects development proposals to incorporate measures such as smart metering and water saving and recycling measures to help achieve lower water consumption rates. The accompanying Water Cycle Strategy, prepared by Hoare Lea confirms that the Proposed Development will effectively manage water resources, reduce potable water demand, and mitigate flood risk, in accordance with regulatory requirements London Plan Policy SI 5.

Fire Strategy

7.59 The accompanying Fire Safety Strategy Statement, prepared by M&S, confirms that the Proposed Development comprises minor external alterations to the existing elevations of Unit 1, and demolition of the former garden centre area. On this basis, the Fire Safety Strategy Statement confirms that the fire documentation under London Plan Policy D12(b) is not relevant to the Proposed Development as there are no proposed works relevant to fire safety considerations, and therefore the application is considered reasonably exempt.

Flood Risk and Drainage

7.60 NPPF Para. 170 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

7.61 Only refurbishment works are proposed for the continued use of the existing retail store, and the works will not increase the vulnerability classification. NPPG Para 027[2] states the following:

"In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied."

7.62 On this basis, the sequential test is not required. Further, NPPG Para 33[3] confirms that 'less vulnerable' developments are considered appropriate within Flood Zone 1,2 and 3a without the requirement to apply the Exception Test. Therefore, application of the Exception Test is not required for the Proposed Development.

7.63 London Plan Policy SI12 (Flood Risk Management) expects development proposals to ensure that flood risk is minimised and mitigated, and that residual risk is addressed. LPP1 Policy EM6 (Flood Risk Management)

7.64 LPP2 Policy DMEI 9 (Management of Flood Risk) states:

"A) Development proposals in Flood Zones 2 and 3a will be required to demonstrate that there are no suitable sites available in areas of lower flood risk. Where no appropriate sites are available, development should be located on the areas of lowest flood risk within the site. Flood defences should provide protection for the lifetime of the development. Finished floor levels should reflect the Environment Agency's latest guidance on climate change.

B) Development proposals in these areas will be required to submit an appropriate level Flood Risk Assessment (FRA) to demonstrate that the development is resilient to all sources of flooding...

...E) Proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused."

7.65 With respect to Critical Drainage Areas, LPP2 Policy DMEI10 (Water Management, Efficiency, and Quality) states:

"B) All major new build developments, as well as minor developments in Critical Drainage Areas or an area identified at risk from surface water flooding must be designed to reduce surface water run-off rates to no higher than the pre-development greenfield run-off rate in a 1:100 year storm scenario, plus an appropriate allowance for climate change for the worst storm duration. The assessment is required regardless of the changes in impermeable areas and the fact that a site has an existing high run-off rate will not constitute justification...

... E) Proposals that would fail to make adequate provision for the control and reduction of surface water run-off rates will be refused...

[2] NPPG Reference ID: 7-027-20220825 (Revision Date 17.09.2025)
[3] NPPG Reference ID: 7-034-20220825 (Revision Date 25.08.2022)

...G) All new development proposals (including refurbishments and conversions) will be required to include water efficiency measures, including the collection and reuse of rain water and grey water.

... I) It is expected that major development proposals will provide an integrated approach to surface water run-off attenuation, water collection, recycling and reuse."

7.66 An accompanying Flood Risk Assessment and Drainage Statement ('FRA') has been prepared by RPS to outline potential for the site to be impacted by flooding, the impacts of the proposed development on flooding in the vicinity of the site, and the proposed measures which could be incorporated to mitigate the identified risks.

7.67 The FRA was prepared in consultation with the Environment Agency (EA) and the Lead Local Flood Authority (LLFA), LB Hillingdon. Modelled flood level data has been provided by the EA, as well as details of historic flooding and flood defences within the vicinity of the site. Information provided by the EA is included at Appendix A of the accompanying FRA. Consultation has been undertaken with the LB Hillingdon, and it was confirmed that there are no reports of historical flooding of the site. The full response is included at Appendix C of the accompanying FRA.

7.68 The Proposed Development comprises refurbishment works to the existing retail unit, which will not impact the existing hard standing surfaces. The existing site area comprises 0 sq.m of permeable area and no increase in impermeable area is proposed as part of the Proposed Development.

7.69 The site is within Flood Zone 2 in line with the EA online map for planning, however the FRA establishes that the site is actually located within Flood Zone 3.

7.70 The FRA assessment identifies 'moderate' surface water and fluvial flood risk at the site. Proposed mitigation for fluvial and surface water flood risk includes raising the plant area at least 300mm above flood levels, using voids so as to not obstruct flow of water. Following implementation of the proposed mitigation, the residual risk is considered to reduce to 'low to moderate'. Flood risk associated with all other known sources including tidal, sewerage, groundwater, reservoirs and artificial sources is considered to be low.

7.71 The application proposes the continued retail use of an existing retail store, and therefore the existing drainage infrastructure serving the retail unit is to be retained. On this basis, a detailed drainage strategy is not required.

7.72 Overall, the accompanying FRA demonstrates that the proposed works will not increase flood risk on site or elsewhere, in accordance with relevant national, strategic and local planning policy.

Noise

7.73 The NPPF requires new development to be appropriate to its location taking into account the likely effects (including cumulative effects) of pollution sources, including noise, on health, living conditions and the natural environment (para. 198). Consequently, planning applications should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and the quality of life.

7.74 London Plan Policy D14 states that development proposals should manage noise by mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development. LPP1 Policy EM8 (Land, Water, Air and Noise) states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

7.75 The application is accompanied by a Noise Impact Assessment, prepared by Sharps Acoustics. At this stage, details of any fixed mechanical plant have not been finalised, and specific mechanical plant equipment is not proposed. Therefore, the accompanying Noise Impact Assessment assesses plant noise limits of any future mechanical plant and external storage container noise emissions against local policy and British Standard ('BS') 4142 'Methods for rating and assessing industrial and commercial sound' requirements. With the proposed plant noise limits set in accordance with BS4142, the accompanying Noise Impact Assessment confirms that there would be no adverse effects associated with the Proposed Development at noise sensitive receptors.

7.76 Overall, the site and its surrounds comprise an established retail park and a Strategic Industrial Location respectively and therefore are subject to a high level of noise and activity. The proposed continued retail use of the site is unlikely to generate significant noise levels above those which already exist at the site. Activity associated with the site would not be out of keeping with its surrounds. The accompanying Noise Impact Assessment confirms there would be no adverse effects associated with future mechanical plant noise levels when limited in accordance with BS4142, or from use of the proposed external storage container. On this basis, the Proposed Development is considered to be in accordance with the NPPF, London Plan Policy D14, Local Plan Policy EM6 and other relevant policies concerning noise matters.

Refuse and Recycling

7.77 London Plan Policy T7 (Deliveries, servicing and construction) expects development proposals to facilitate safe, clean, and efficient deliveries and servicing. LPP1 Policy EM11 (Sustainable Waste Management) states that the Council will require all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site. LPP2 Policy DMHB 11 (Design of New Development) reiterates London Plan requirements, and states that development proposals should make sufficient provision for well-designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

7.78 No changes are proposed to the existing access and servicing arrangements. Vehicle swept path analysis is included at Appendix C of the accompanying Transport Assessment, demonstrating that a 16.5 articulated lorry can access/egress the servicing yard to the rear of Unit 1 in forward gear. A single loading dock is to be provided within the servicing yard, and deliveries will be managed carefully so that no more than one vehicle attends the site at any one time.

7.79 A Waste Management Plan has been prepared by M&S to accompany the application, which provides further details on the anticipated types of operational waste and the existing storage facilities on site for refuse and recycling. The majority of waste will be taken away by vehicles delivering goods, however an additional private waste management contractor collection will be arranged.

7.80 Overall, with no changes proposed to the existing servicing strategy at Unit 1, it is considered that the refuse and recycling strategy is acceptable and in accordance with London Plan Policy T7, LPP1 Policy EM11 and LPP2 Policy DMHB11.

8.0 Section 106 Heads of Terms

8.1 The Applicant is committed to delivering the Proposed Development in accordance with obligations considered necessary to make the development acceptable in planning terms, specifically with reference to the LB Hillingdon Planning Obligations Supplementary Planning Document (adopted 10 July 2014) and the legislative tests set out in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended).

8.2 Planning obligations will be discussed and agreed between the Applicant and LB Hillingdon during the planning determination period.

9.0 Conclusions

9.1 This Planning and Retail Statement has been prepared by Lichfields on behalf of M&S. It provides a planning and retail assessment of the proposals against national, strategic and local planning policy and guidance to assist the Council in consideration of full planning applications for:

- *"Continued use as a retail unit (Class E(a)), including food sales, with external alterations to the front, rear and side elevations of the unit, demolition of the existing garden centre, provision of plant area, installation of new trolley bays, cycle parking and other associated works.";* and
- *"Reconfiguration of existing mezzanine and installation of additional mezzanine floorspace."*

9.2 This report provides an assessment of the retail matters raised by the proposed increase in retail floorspace and sale of food from the retail unit, concentrating on retail planning policy, in particular the sequential and impact tests. No change of use is proposed, with the continued lawful use of Unit 1 to remain Class E(a).

9.3 M&S has undertaken pre-application engagement with LB Hillingdon's Chief Executive and Director of Planning and Sustainable Growth; it is considered the proposed works and delivery of a full-line M&S store at Unit 1 represent a prime opportunity for sustainable refurbishment of an outdated existing retail unit.

9.4 The proposals enable development and efficient use of an existing brownfield site in accordance with the objectives of the NPPF and Statutory Development Plan. In turn, the proposed scheme will yield a wide range of substantial public benefits, which can be summarised as follows:

- Delivery of new food sales floorspace to serve the needs of the growing population in the local area and adding to the overall retail offer of the area by enhancing customer choice.
- The proposals would deliver a high-quality, contextually appropriate refurbishment design that represents a significant improvement to the existing dated elevational treatment, positively contributing to the local townscape and future-proofing Unit 1 for long-term retail use. With respect to sustainability, a 47.3% reduction in emissions over Building Regulations Part L (2021) is predicted, comprising a 43.4% reduction achieved over existing building performance through passive and energy efficiency measures alone.
- Installation of 34 new cycle parking spaces on site, to encourage and promote sustainable travel behaviour amongst staff and customers. The proposed net increase of two disabled parking spaces and seven parent and child parking spaces will enhance the site's accessibility for all users.
- Contribution to the local economy and community through the generation of up to 123 new jobs for local people across a range of roles once the full-line store is operational, with additional local job generation anticipated during construction stage.

- Further local community benefits through implementation of M&S' wide ranging employment and colleague development programmes, including employability schemes, career support and training, industrial placements, graduate and internship programmes, and wide-ranging apprenticeship schemes. Full details regarding M&S employment initiatives are included in the accompanying Operator Statement.

9.5 Together, these material public benefits weigh strongly in support of the Proposed Development.

9.6 It is concluded that the Proposed Development will deliver a high-quality scheme in accordance with the NPPF, the London Plan and LB Hillingdon's Development Plan. For these reasons, we request that full planning permission is granted for both planning applications.

Appendix 1 Sequential Site Assessment

Sequential Site Assessment

A1.1 For the purposes of the sequential assessment, and in order to demonstrate flexibility, we have looked at whether there are sites or vacant units that could accommodate the proposed floorspace (5,731 sq.m or up to around 10% less) that are available and suitable. For a site to accommodate a store of 5,731 sq.m GIA plus servicing and some car parking, it would need to be 1.4ha or more. However, even smaller sites (1.2ha and above) have been considered in this assessment, and vacant units/buildings up to 10% below the 5,731 sq.m the proposed net floorspace have been considered to ensure a robust analysis.

A1.2 Car parks were reviewed during the site visit. However, these were all at least circa 50% full at the time of the visit and perform a valuable role. They are therefore not considered suitable for redevelopment.

A1.3 As established in the body of this assessment, for a site or vacant unit to be appropriate, it will need to:

- Provide large, flexible floorplates with good ceiling heights.
- Be located in prominent locations with good visibility; and
- Provide good access to car parking to enable the store to serve customers.

A1.4 The assessment of sites below is based on these requirements.

South Ruislip Local Centre

In Centre Sites

A1.5 There were no suitable in centre sites identified for consideration in this assessment.

Edge of Centre Sites

A1.6 There were no suitable edge of centre sites identified for consideration in this assessment.

Ruislip District Centre

In Centre Sites

A1.7 There were no suitable in centre sites identified for consideration in this assessment.

Edge of Centre Sites

A1.8 There were no suitable edge of centre sites identified for consideration in this assessment.

Ruislip Manor Minor Centre

In Centre Sites

A1.9 There were no suitable in centre sites identified for consideration in this assessment.

Edge of Centre Sites

A1.10 There were no suitable edge of centre sites identified for consideration in this assessment.

Eastcote District Centre

In Centre Sites

A1.11 There were no suitable in centre sites identified for consideration in this assessment.

Edge of Centre Sites

A1.12 There were no suitable edge of centre sites identified for consideration in this assessment.

North Hillingdon Local Centre

In Centre Sites

A1.13 There were no suitable in centre sites identified for consideration in this assessment.

Edge of Centre Sites

Land South East of Hillingdon Station (NH1)

A1.14 The site is within the local centre boundary but circa 75m north east of the primary shopping area boundary, and is an edge of centre site in retail terms. The site is approximately 3.3ha. It is located just south of Hillingdon Station and is not currently open to the public, nor is it visible from the public highway. The site is not in a conservation area and there are no nearby listed buildings.

Figure A1.1 Aerial view of site NH1 indicated by the white outline

Source: Google Earth

A1.15 The site is part B of the wider Former Master Brewer and Hillingdon Circus site allocation (SA 14), which also includes the currently vacant parcel of land immediately to the west (part A). The LB Hillingdon Local Plan Part 2 (Site Allocations and Designations) notes that part B of the allocation has capacity to deliver circa 250 residential units by 2026. The allocation identifies that whilst the nature of the scheme will be predominantly residential, the Council will accept a proportion of other uses that are appropriate to the site's location within the North Hillingdon Local Centre, including a hotel, restaurant and small scale retail.

A1.16 The site has an extensive planning history. The most relevant to this assessment is the March 2021 full planning permission which granted for the following (ref. no. 4266/APP/2019/3088):

"Full planning permission for the construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class B1/A1/A3/D1); associated car (164 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development."

A1.17 Condition 44 attached to this condition stated that no ground floor commercial/flexible unit shall exceed 300 sq.m in size.

A1.18 No discharge of condition applications pursuant to this permission have been submitted, and our research did not reveal that any works were occurring on site. It is therefore not clear if this permission has been implemented.

A1.19 The site is of a size and shape that could potentially accommodate the development. However, the site is subject to a 2021 planning permission for a residential-led, mixed-use development. Although it is not clear if this permission has been implemented, the site is allocated for mixed-use development with an indicative capacity of 250 residential units. LB Hillingdon's 5 Year Housing Land Supply Report 2022/2023 – 2026/2027 (March 2023) reveals that the site is anticipated to deliver 514 units over the 5 year period. By virtue of the site allocation it is clearly the Council's intention that the site will come forward as a residential-led, mixed-use development, and makes an important contribution to the Council's housing land supply trajectory. Departing from the site allocation would undermine this and would conflict with Local Plan policy.

A1.20 In conclusion, the site is not suitable or available for the proposed development; therefore, it is not sequentially preferable. In addition, North Hillingdon is on the periphery of the 10 minute drivetime and would not serve the same catchment area as the proposed M&S store.

North Harrow District Centre

In Centre Sites

A1.21 There were no suitable in centre sites identified for consideration in this assessment.

Edge of Centre Sites

A1.22 There were no suitable edge of centre sites identified for consideration in this assessment.

South Harrow District Centre

In Centre Sites

A1.23 There were no suitable in centre sites identified for consideration in this assessment.

Edge of Centre Sites

A1.24 There were no suitable edge of centre sites identified for consideration in this assessment.

Rayners Lane District Centre

In Centre Sites

A1.25 There were no suitable in centre sites identified for consideration in this assessment.

Edge of Centre Sites

A1.26 There were no suitable edge of centre sites identified for consideration in this assessment.

Northolt Neighbourhood Centre

In Centre Sites

A1.27 There were no suitable in centre sites identified for consideration in this assessment.

Edge of Centre Sites

Land to the North-East of Northolt Station (N1)

A1.28 The site is located directly east of the centre boundary, immediately north of the railway line serving Northolt Station. The site is not currently open to the public. It is not in a conservation area and there are no nearby listed buildings.

Figure A1.2 Aerial view of site N1 indicated by the white outline

Source: Google Earth

Figure A1.3 Land to the North East of Northolt Station

A1.29 In January 2023, planning permission was granted for development authorised by the High Speed Rail (London-West Midlands) Act 2017 in relation to HS2 works (ref. no. 23/0131/HS2). In May 2024 a Non-Material Amendment application to the 2023 permission was approved (ref. no, 24/1999/HS2NMC). In January 2025 planning permission was granted also for works pursuant to HS2 (re. no. 25/0100/HS2). The site's planning history indicates it is in active use as part of the ongoing HS2 works.

A1.30 The site measures around 1.4ha and is of a size that could accommodate the proposed floorspace with some car parking and servicing area. However, the site is not suitable for development as it is not in a prominent location with good visibility, which is required by retail operators. Additionally, the site is in active use as part of the ongoing HS2 works, evidence by its planning history and works at the site at the time of the visit. It is therefore not available.

A1.31 In conclusion, the site is not suitable for the development proposed; therefore, it is not sequentially preferable.

Harrow Town Centre

A1.32 Harrow Town Centre is located beyond the core catchment area of the proposed M&S store and is beyond the 10 minute drivetime from the site.

In Centre Sites

Former Debenhams, Station Road, Harrow (H1)

A1.33 The site is within the Primary Shopping Area and is a unit with approximately 6,600 sq.m of floorspace at ground floor level. It is in centre in sequential terms. The site is in a prominent location along Station Road which forms part of Harrow's main high street. There is a large car park to the rear of the unit. It is understood Debenhams occupied the unit until it vacated in May 2021.

A1.34 It is understood that following the closure of Debenhams the unit accommodated a new operator, Landmark, which closed in 2022. Furniture store Home Land opened in February 2023 on a temporary basis until the unit could be taken over by a permanent occupier.

Figure A1.4 Aerial view of site H1 indicated by the white outline

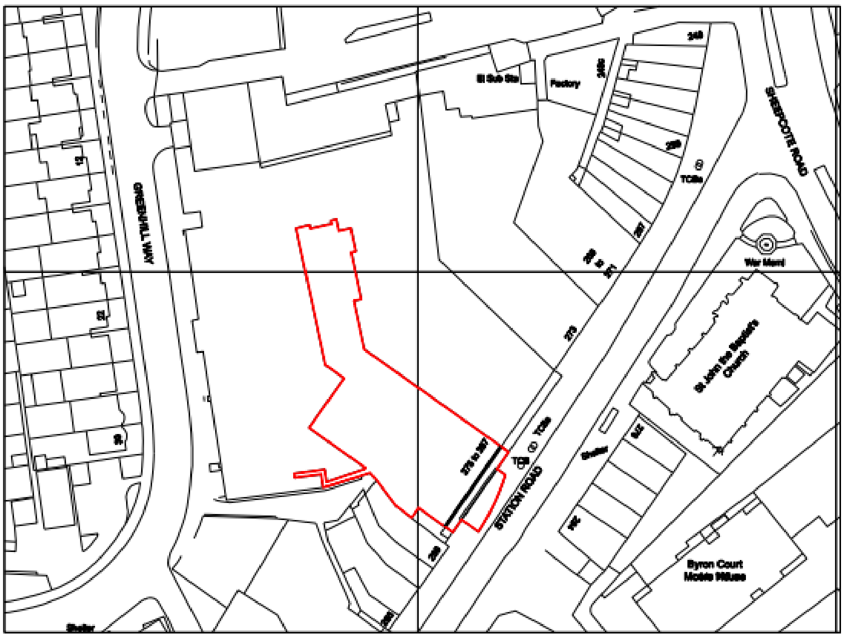
Source: Google Earth

A1.35 In August 2025 full planning permission was granted for the following (ref. no. PL/1529/25):

"Installation of new shopfront complete with new entrance doors, removal of existing canopy."

A1.36 From a review of this application, the unit is due to be occupied by Iceland Foods. From the submitted plans, it is evident that the proposed Iceland will occupy part of the ground floor (approximately 1,376 sq.m GIA), as shown on the figure below.

Figure A1.5 Extract from Site Location Plan (application ref. PL/1529/25)



A1.37 A further application has been approved for erection of a plant compound, installation of roof plant, and openings in the external wall for vent grills (ref. no. PL/1853/25). This application will support the use of the unit as a food store, and the applicant is listed at Iceland Foods Ltd. The officer's report for this application notes that the application site comprises a multistorey building that was originally occupied by one retailer; however, now the site has been split to be occupied by various retailers and businesses, and there is a current application pending for use part of the fourth floor as a banqueting hall (ref. no. PL/0977/25).

A1.38 The site is suitable to accommodate the proposed development by virtue of its size and prominent location. However, it is not currently available, as it is due to be occupied by Iceland Foods soon. The remaining part of the former Debenhams unit that will not be taken up by the Iceland store is an awkward configuration and would not be suitable for the proposed development.

A1.39 In conclusion, the site is not available for the development proposed; therefore, it is not sequentially preferable.

Edge of Centre Sites

A1.40 There were no suitable edge of centre sites identified for consideration in this assessment.

Uxbridge Town Centre

A1.41 Uxbridge Town Centre is located beyond the core catchment area of the proposed M&S store and is beyond the 10 minute drivetime from the site.

In Centre Sites

A1.42 There were no suitable in centre sites identified for consideration in this assessment.

Edge of Centre Sites

<u>Site South of Harefield Road, Uxbridge (U1)</u>

A1.43 The site is located circa 150m north of the centre boundary, south-east of Harefield Road. The site is not currently open to the public.

Figure A1.6 Aerial view of site U1 indicated by the white outline

Source: Google Earth

A1.44 The entire site (including the car park area and existing built form) is circa 7,300sqm, and the existing built form has a floorspace of circa 3,720sqm. The site is not in a conservation area and it is well screened from listed buildings in Uxbridge town centre.

Figure A1.7 Site South of Harefield Road

A1.45 In May 1993 full planning permission was granted for redevelopment of the site for non-food retail purposes including service and access from Warwick Place and public access via

Harefield Road (16299/R/93/0504). The site's recent planning history indicates this permission has been amended to allow food goods to be sold from the unit (ref. nos. 16299/APP/2023/3691 and 16299/APP/2024/32). It is clear from application ref. no. 16299/ADV/2025/38 that Aldi will occupy the site. The site was under construction at the time of the site visit and Aldi-branded hoarding was present at the site.

A1.46 It is understood that Aldi is only part occupying the site. The remainder of the building currently on site is on the market with 14,477 sq.ft available.

A1.47 The site in its entirety is too small (below 1.2ha) to accommodate the proposed development. The existing units on the site are also below the required floorspace of 5,731 sq.m. Therefore, the site and existing units are not suitable to accommodate the proposed development.

A1.48 A large proportion of the existing unit is due to be occupied by Aldi in the near future (forecast to open by the end of 2025). The site is therefore not available to accommodate the proposed development.

A1.49 In conclusion, the site is not suitable or available for the proposed development; therefore, it is not sequentially preferable.

Appendix 2 Health Checks

South Ruislip Local Centre

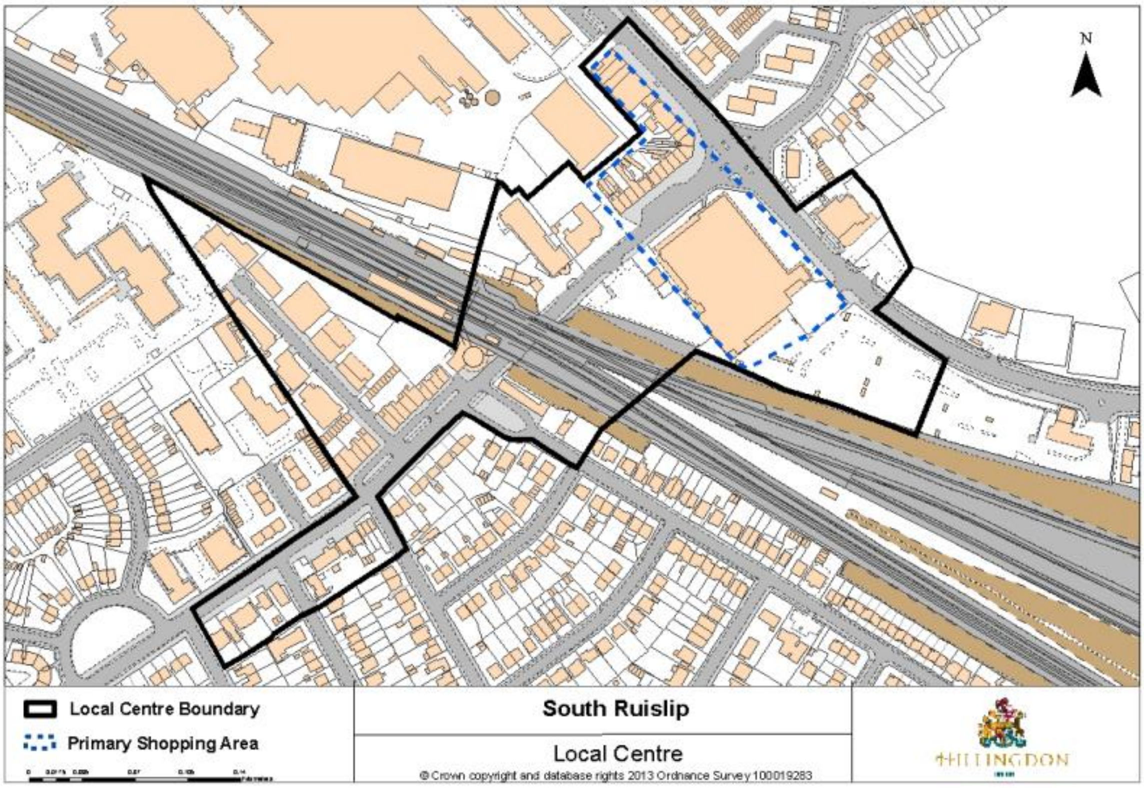
Type of centre

A2.1 South Ruislip is defined as a Local Centre in the LB Hillingdon Local Plan Part 2.

Physical Structure of the Centre

A2.2 The centre is small, and its retail offering is largely concentrated immediately north of South Ruislip Station in the Primary Shopping Area. The station sits at the mid point of the centre, and the boundary extends east of the centre incorporating an industrial area. South Ruislip Library is included within the boundary at the east. The boundary excludes the former Arla Dairy site and Asda Superstore, Lidl and B&M to the north.

Figure A2.1 South Ruislip Local Centre



Source: LB Hillingdon Local Plan Part 2

Retailer Representation

A2.3 The retail offering in the centre is fairly limited. In terms of convenience stores, there is a Sainsbury's which acts as an anchor store, and a few other independent retailers. The comparison store offering is limited and includes a carpet shop, technology store and florist, all independent.

Diversity of Uses

A2.4 The variety of services is reflective of the centre's small size. There is a nursery, barber, a few restaurants and coffee shop. There is a fairly sizeable industrial area to the east of the station, providing large scale industrial buildings accommodating various business types.

Vacancy Rates

A2.5 South Ruislip is not included in the LB Hillingdon Retail Revival Evaluation Report (2023). From our site visit (July 2025), there was only one vacancy in the centre, indicating a viable, healthy centre.

Figure A2.2 South Ruislip Local Centre

Accessibility and Pedestrian Flows

A2.6 The centre is served by South Ruislip Station, providing visitors access locally, as well as to central London. There are also bus stops in the centre, adding to its accessibility. The centre benefits from reasonable levels of car parking.

Environmental Quality

A2.7 South Ruislip's environmental quality is limited. Although the streets are lined with trees and were generally free from litter, the centre is dominated by busy, multi lane roads and junctions which undermine its quality.

Supermarkets

A2.8 Sainsbury's: the supermarket was busy with a car park occupancy rate of 80% and with 16 self-checkouts, all of which were in operation and 6 staff checkouts. The majority of the store consisted of convenience goods sales, with a small selection of non-food items with an 80:20 split.

Edge of Centre Provision

A2.9 There is an Asda immediately north of the centre boundary. The car park was circa 60% full at the time of the visit. 15 self service tills were in operation, alongside four staffed tills. The convenience comparison split was 80:20.

Summary

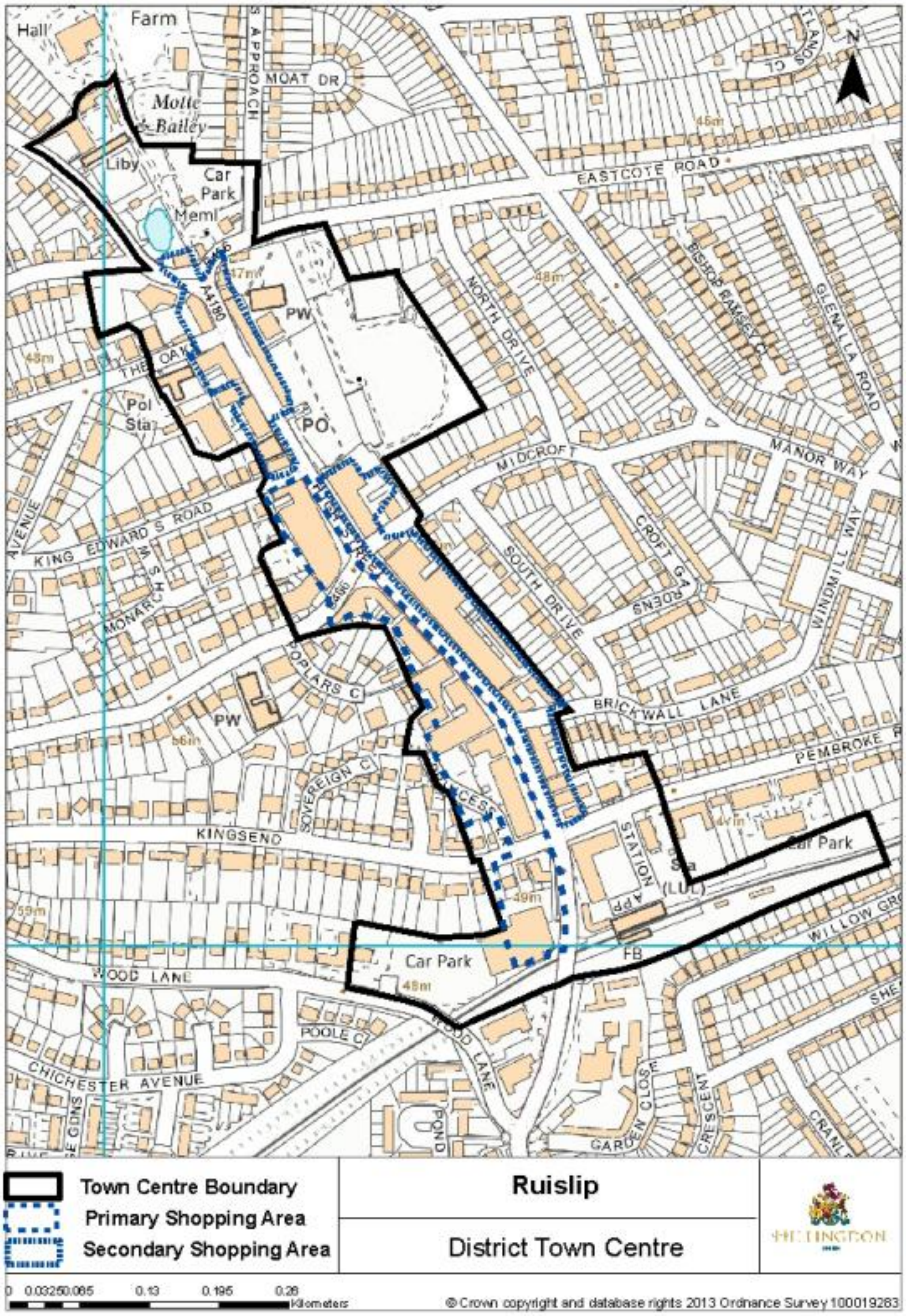
A2.10 South Ruislip centre has a good convenience offer, with a busy Sainsbury's supermarket that trades well, along with other independent shops. The centre has limited comparison retailing and services, reflective of its size. It is a vital and viable centre with a very low vacancy level. The centre serves the local population and provides an important transport hub for the surrounding area.

Ruislip District Centre

Type of Centre

A2.12 Ruislip is defined as a District centre in the LB Hillingdon Local Plan Part 2.

Figure A2.3 Ruislip District Centre



Source: LB Hillingdon Local Plan Part 2

Physical Structure of the Centre

A2.13 The majority of the centre's retail offer is focused along the A4180 in a high street style format. There is a Waitrose store at the south east of the centre which also includes a car park. The centre also includes sporting facilities, a library and a park to the north, but excludes the Winston Churchill Theatre which sits just outside the centre's northern boundary.

A2.14 The centre is a reasonable size extending from Ruislip Station to the south to Manor Farm at the northern end.

Retailer Representation

A2.15 In terms of convenience stores, the centre benefits from established chain retailers such as Tesco, Sainsbury's, Iceland and Waitrose.

A2.16 The comparison stores within the centre include Card Factory, CEX, Superdrug, Boots as well as independent comparison stores.

Diversity of Uses

A2.17 The centre has a good range of service provision, including banks, opticians, estate agents lawyers, hairdressers and nail shops. There are both independent and chain coffee stores along the high street such as Costa and Caffe Nero. There are also various restaurants, including chains such as The Lounges, and independents. There is some provision of hot food takeaways. The centre provides good day and night time services.

A2.18 There is residential use above the majority of the units along the High Street.

Figure A2.4 Ruislip District Centre

Vacancy Rates

A2.19 Ruislip is a fairly healthy centre. There were a few vacant units; units that were vacant were small and not clustered in one area.

A2.20 The LB Hillingdon Retail Revival Evaluation Report (2023) noted that there were 11 vacant units (8%) in 2022, which is below the UK average. Our site visit (July 2025) found that this figure has reduced by at least two. This below average vacancy rate is a positive indication of the attraction and performance of the centre.

Accessibility and Pedestrian Flows

A2.21 The centre is served by a number of buses and Ruislip Station which ensure it benefits from good connectivity to nearby areas and central London.

A2.22 The centre is served by Waitrose car park providing restricted free parking, and there are side roads from the high street which do not have parking restrictions.

A2.23 The centre as a whole was busy, and was very pedestrian friendly via wide pavements which were in good condition, and an abundance of pedestrian crossings.

Environmental Quality

A2.24 Ruislip District Centre has a pleasant environment. There are a number of public benches outside shops for visitors in the centre. The pavements are wide with plenty of trees and other soft landscaping. The area was generally free from litter and graffiti. Buildings in the centre are generally attractive, with the hipped roof style upper buildings being particularly noticeable.

Figure A2.5 Ruislip District Centre

Supermarkets in the Centre

A2.25 There is a Waitrose supermarket in the centre boundary, which was busy at the time of the visit. It had a car park occupancy rate of 80%, with 14 self-checkouts and eight staffed checkouts, all open. The majority of the store consisted of convenience goods, with a small selection of comparison items at an 80:20 split.

A2.26 The centre also contained an Iceland supermarket. The store had a total of 16 self service checkouts all of which were open, and seven staff checkouts of which three were open. The majority of the store consisted of convenience goods, with a small selection of non-food items at an 80:20 split.

A2.27 There is also a Sainsbury’s Local within the boundary which was moderately busy at the time of the visit. One of two checkouts was open and two self-checkouts were available. The store mainly sells food with a minimal non-food range.

A2.28 The Tesco Express in the centre was not observed to be busy at the time of the visit. One of three staffed checkouts was open and all three self-checkouts were open. In common with the Sainsburys, the store had a limited non food offer.

Summary

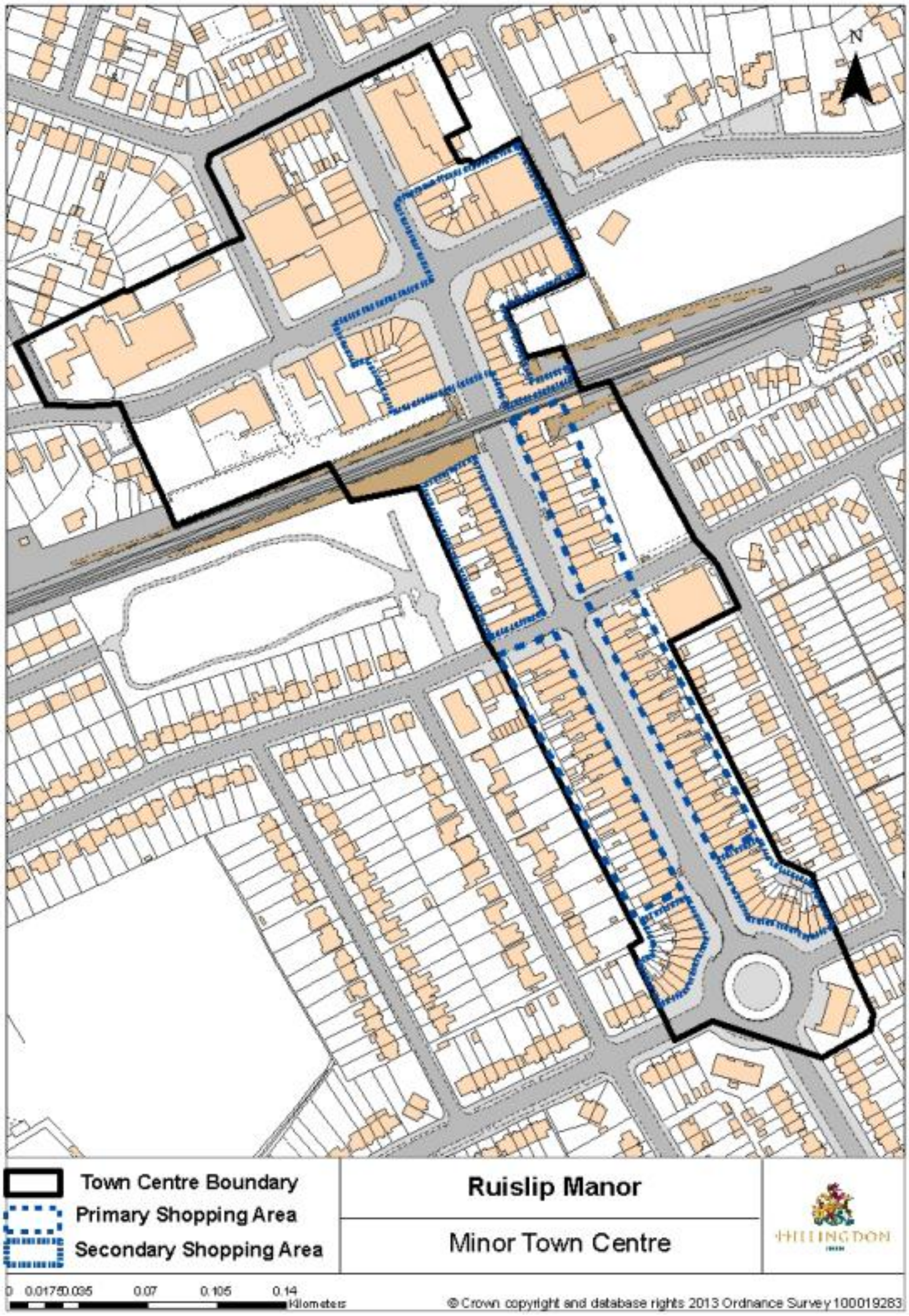
A2.29 Ruislip is a well-connected, attractive, pedestrian-friendly centre. The centre benefits from good public transport links and a mix of on-street and off-street parking. It offers a pleasant environment with wide pavements, landscaping, public seating and amenities, including bike racks. Ruislip plays an important role to local residents.

Ruislip Manor

Type of Centre

A2.31 Ruislip Manor is designated as a Minor Centre in the LB Hillingdon Local Plan Part 2.

Figure A2.6 Ruislip Manor Minor Centre



Source: LB Hillingdon Local Plan Part 2

Physical Structure of the Centre

A2.32 Ruislip Manor is a small centre in a linear high street style format. It is centred around Ruislip Manor station reaching Chelston Approach to the south and Manor Way to the north, also encompassing an area of Pembroke Road at the north east.

Retailer Representation

A2.33 In terms of convenience stores, the centre offers a Tesco Express and a Budgens store. There is a limited offering of independent convenience retailing, including newsagents.

A2.34 The majority of comparison retail are independent retailers, but there are a few larger retailers including Superdrug and Dreams. The independent comparison retail offer is commensurate with a centre this size and includes homeware stores, and a jeweller.

Figure A2.7 Ruislip Manor Minor Centre

Diversity of Uses

A2.35 The centre consists of a variety of other uses, including funeral directors, estate agents, motorcyclist retailer, and a tuition centre.

A2.36 The majority of the units have residential units above.

Vacancy Rates

A2.37 Generally, Ruislip Manor is a healthy centre. There were very few vacant units, and units that were vacant were small and not clustered in one area.

A2.38 The LB Hillingdon Retail Revival Evaluation Report (2023) noted that there were three vacant units (2%) in 2022, which is considerably below the UK average. Our site visit (July 2025) found that this figure has not changed. This very low vacancy rate is a positive indication of the attraction and performance of the centre.

Accessibility and Pedestrian Flows

A2.39 The centre is well-connected by public transport. Ruislip Manor Station provides access to central London. The centre is also served by a variety of buses, which further help connectivity within and out of the centre.

A2.40 There are a variety of parking spaces for visitors in front of shops, as well as in car parks associated with stores in the centre.

A2.41 The pavements were very wide and in good condition. There were also sufficient pedestrian crossings. The centre is accessible for all prospective users.

Figure A2.8 Ruislip Manor Minor Centre

Environmental Quality

A2.42 The centre's quality was relatively pleasant with benches and trees lining Victoria Road. There was no littering visible in the area, and no presence of graffiti. The pavements were in good condition, which strengthened the character of the centre.

Supermarkets

A2.43 The centre included a Tesco Express which had a car park occupancy rate of around 70% at the time of the visit. This store was fairly busy at the time of the visit and contained two staff checkouts and three self checkouts which were all open. The majority of the store consisted of convenience goods, with a small selection of non-food items with an 80:20 split.

Summary

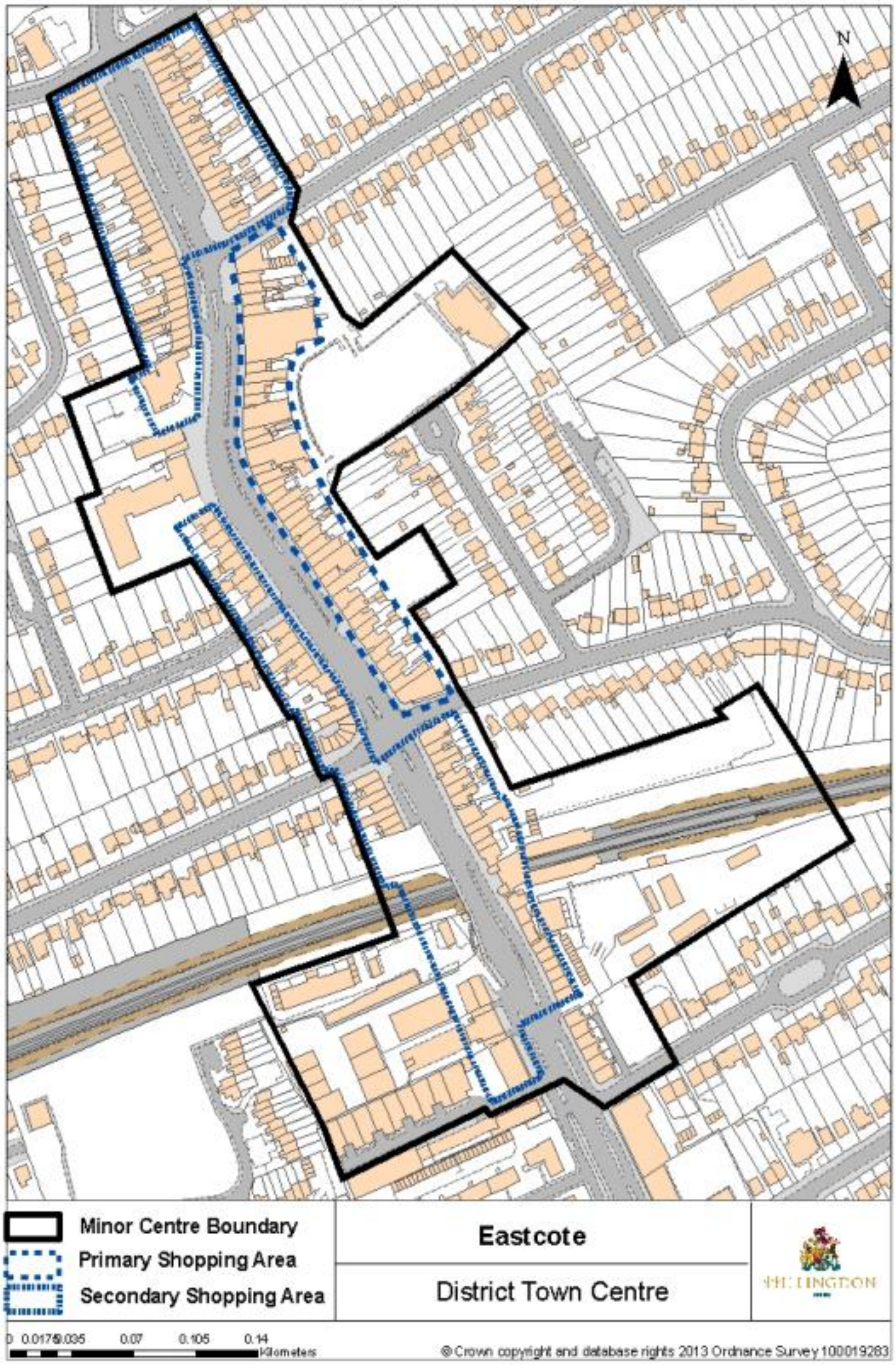
A2.44 Ruislip Manor is a pleasant and well-maintained centre. It has a good mix of retail units and food and beverage establishments, and provision of some other services. It is an attractive centre with few vacancies.

Eastcote

Type of Centre

A2.45 Eastcote is defined as a District Town Centre in the LB Hillingdon Local Plan Part 2.

Figure A2.9 Eastcote District Centre



Source: LB Hillingdon Local Plan Part 2

Physical Structure of Centre

A2.46 The centre's retail offer is focused along Field End Road in a high street style format. The centre is reasonably large, extending c. 150m south of the railway line and approximately 500m north of the railway line. The centre boundary includes Eastcote Station Car Park immediately south east of Eastcote Station, which also incorporates a number of industrial trade/storage yards.

A2.47 The railways line cuts horizontally through the centre, serving Eastcote Station.

Retailer Representation

A2.48 The centre contains a good provision of convenience stores, with some chain retailers such as Aldi, Sainsbury's and Tesco. There are also a number of other smaller independent newsagents, greengrocers, and cultural food stores.

A2.49 The comparison retail offering was reasonable for a centre of this size. There were a few big high street names, including Superdrug, Boots and Holland and Barrett. There was also a good range of independent comparison stores including a pharmacy and a DIY shop.

Diversity of Uses

A2.50 The centre offers good services. Such stores include multiple hairdressers, a betting shop, and a dentist. Eastcote also offers community services with a library towards the north of the centre boundary.

A2.51 There is residential above the majority of the units.

Figure A2.10 Eastcote District Centre

Vacancy Rates

A2.52 Generally, Eastcote is a healthy centre. There were very few vacant units, and units that were vacant were small and not clustered in one area.

A2.53 It is noted in the LB Hillingdon Retail Revival Evaluation Report (2023) that the number of vacancies in Eastcote had almost doubled since 2021. This Report noted that there were nine vacant units (6%) in 2022, which is below the UK average. Our site visit (July 2025) found that this figure has not changed. This low vacancy rate is a positive indication of the attraction and performance of the centre.

Accessibility and Pedestrian Movement

A2.54 Eastcote is well connected in terms of public transport, sitting on the Uxbridge branch of the Metropolitan and Piccadilly lines. There are bus stops across the centre, connecting Eastcote to surrounding towns.

A2.55 There are a number of surrounding roads outside the centre which provide unrestricted car parking. There are a few car parks within the centre providing plentiful public car parking; the car parks were on average approximately 40% full at the time of the visit.

A2.56 The town was relatively busy throughout, with pedestrian flows concentrated at Tesco Express, Aldi and Superdrug. Aldi was particularly busy, with people using it as an access point to the high street from the centre's main car park.

Environmental Quality

A2.57 Eastcote is an attractive centre, and the overall environmental quality is high. Building frontages are well kept and there is minimal rubbish on the streets. There are trees and other landscaping lining the high street which adds to the overall quality of the centre. The traffic was moderately busy.

Figure A2.11 Eastcote District Centre

Supermarkets in the Centre

A2.58 Aldi was fairly busy at the time of the visit. Six out of sixteen self-checkouts were open and one of three staffed checkouts was open. The store stocked majority convenience items, with minimal comparison items at a ratio of approximately 90:10.

A2.59 Tesco Express was not observed to be busy at the time of the visit. One of two staffed checkouts was open and all three self-checkouts were open. The store stocked convenience items with minimal comparison items at a ratio of approximately 90:10.

A2.60 Sainsbury's Local was reasonably busy at the time of the visit. There was one till open and all self checkouts were in use. The store stocked majority food, with some non-food items at a ratio of approximately 90:10.

Summary

A2.61 Eastcote is a healthy and attractive centre, providing a good range of comparison and convenience facilities. The centre benefits from a few larger high street names, alongside reasonable provision of independent comparison/convenience goods, and there were very few vacancies in the centre which adds to the overall attractiveness and viability of the centre.

North Hillingdon

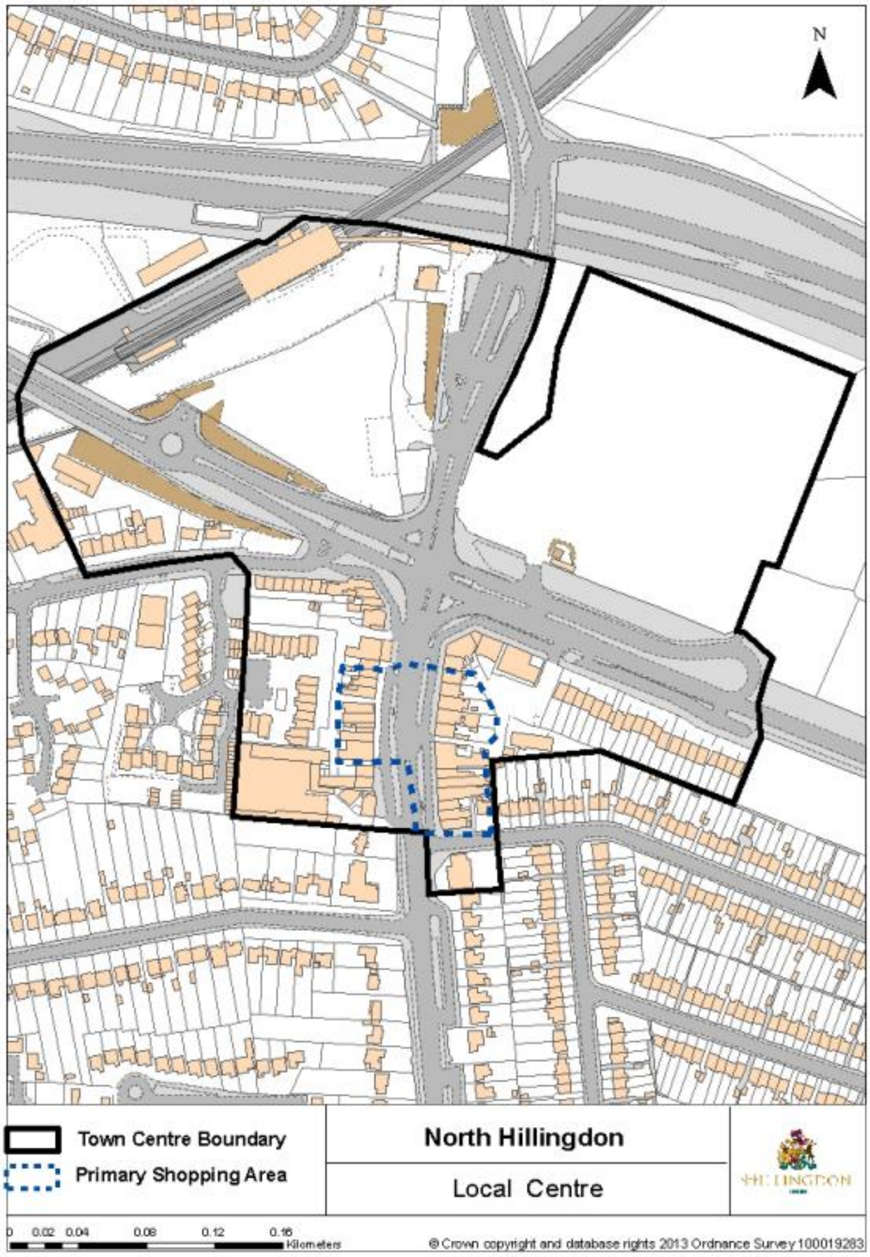
Type of centre

A2.63 North Hillingdon is defined as a Local Centre in the LB Hillingdon Local Plan Part 2.

Physical structure of centre

A2.64 North Hillingdon is a small centre with majority of the retail and convenience offer focused along Long Lane. The Primary Shopping Area is very small, containing only circa 23 units. The centre boundary includes Hillingdon Station at the north, and various parcels of currently brownfield, undeveloped land immediately to the south of the station.

Figure A2.12 North Hillingdon Local Centre



Source: LB Hillingdon Local Plan Part 2

Retailer representation

A2.65 The centre's convenience offer is minimal, comprising of a Co Op, an independent newsagent, a bakery and a butcher.

A2.66 In terms of comparison stores, the retail offer is also minimal, with the centre including a pharmacy, a DIY shop and a charity shop.

Diversity of uses

A2.67 The small size of the centre means there is fairly limited provision of services. These include a hair shop, a phone repair shop, and an opticians. There is minimal food and beverage provision in the centre.

A2.68 There is residential above the majority of the units in the centre.

Figure A2.13 North Hillingdon Local Centre

Vacancy rates

A2.69 North Hillingdon is a fairly healthy centre. There were a few vacant units; units that were vacant were small and not clustered in one area.

A2.70 The LB Hillingdon Retail Revival Evaluation Report (2023) noted that there were four vacant units (10%) in 2022, which is below the UK average. Our site visit (July 2025) found that this figure has reduced to three. This below average vacancy rate is a positive indication of the attraction and performance of the centre, the role it plays locally.

Accessibility and pedestrian movement

A2.71 North Hillingdon is easily accessible by public transport, with Hillingdon Station and bus services on Long Lane connecting the area with Central London and surrounding towns.

A2.72 Pedestrian flows at the time of the visit were most concentrated at Hillingdon Station and at the Co Op store, with other areas of the centre seeming noticeably quiet. Hillingdon Station car park was at approximately 40% capacity with most pedestrians departing the station on foot.

A2.73 The centre is served by the station car park, although from the site visit it was apparent this was largely in use by people accessing the station, not utilising the car park to go shopping. There is very limited on street parking in the centre. It is considered the centre largely serves those arriving on foot.

Environmental quality

A2.74 North Hillingdon is not a particularly attractive centre in terms of its environmental quality. Heavy traffic through the centre and a very busy, large junction detracts from the overall quality of the area.

Figure A2.14 North Hillingdon Local Centre

A2.75 In the Primary Shopping Area, the pavements are clear and there is minimal rubbish along Long Lane which adds to the quality of the centre.

Supermarkets in the centre

A2.76 The Co-op in the centre was relatively busy at the time of the visit. All three self-service checkouts were open, and one of two staff checkouts was open. The store stocked majority food items with minimal non-food items at a ratio of 95:5.

Summary

A2.77 North Hillingdon is a small but viable local centre providing some comparison and convenience facilities. The limited offer of the centre serves a local catchment.

North Harrow

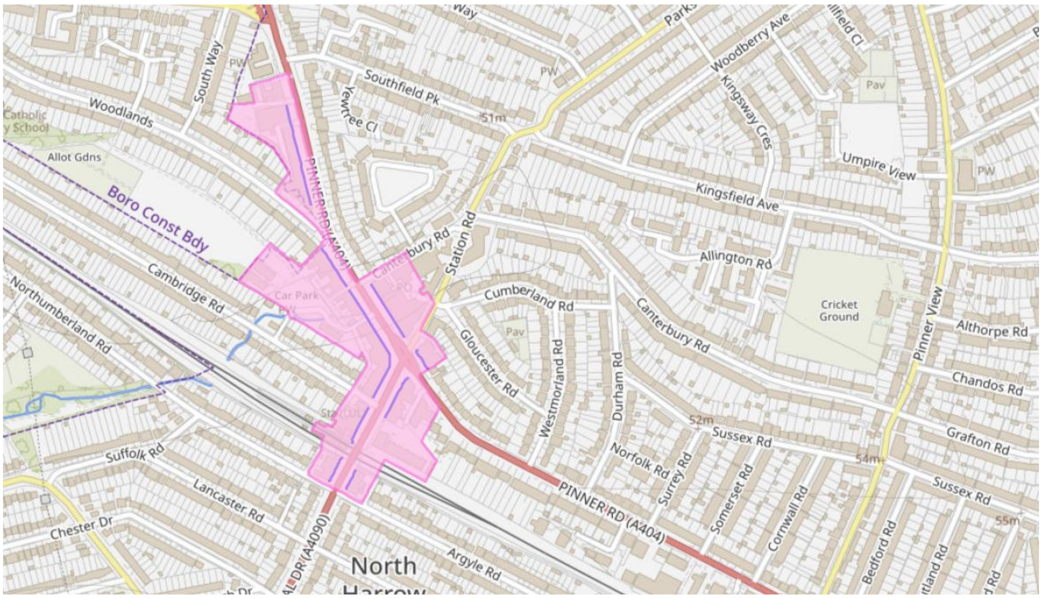
Type of Centre

A2.79 North Harrow is defined as a District Centre in the LB Harrow Local Plan Core Strategy.

Physical Structure of Centre

A2.80 North Harrow is a small centre with the majority of the retail offer focused along Pinner Road, in a high street style format. The centre boundary begins just south east of the railway line and extends just under 500m north east of North Harrow station.

Figure A2.15 North Harrow District Centre



Source: LB Harrow Local Plan Core Strategy

Retailer Representation

A2.81 In terms of convenience stores, the centre contains a Tesco Express and several small, independent newsagents. The comparison offer comprises independent retailers and was reasonable for a centre of this size. Comparison operators include a pharmacy, an independent kitchen shop and a florist.

Diversity of Uses

A2.82 There are a number of other services within the centre, including hairdressers, beauticians, estate agents, accountants, medical aesthetic clinic, dentists, library and a gym. The range of services in addition to retail was relatively broad given the small size of the centre and these services provide good day and night time services.

A2.83 There is residential above the majority of the units in the centre.

Vacancy Rates

A2.84 Generally, North Harrow is a healthy centre. There were few vacant units, and units that were vacant were small and not clustered in one area.

A2.85 This is noted in the Harrow Economic Needs Study Town Centres and Office Update (2024) which recognises that the centre has a low vacancy level compared to the UK average. This study noted there were six vacant units in 2023. Our site visit (July 2025) found there were four vacant units in the centre. This relatively low vacancy rate is appositive indication of the attraction and performance of the centre.

Figure A2.16 North Harrow District Centre

Accessibility and Pedestrian Movement

A2.86 North Harrow demonstrates excellent connectivity, via the centre's strong transport connections. There are bus stops along the High Street providing access to the surrounding area and North Harrow train station connects the centre to wider areas of London.

A2.87 The centre is served by a large car park just off from Pinner Road which was approximately 70% full at the time of the visit. There are a number of roads in the surrounding area which do not have parking restrictions.

A2.88 There was a generally consistent level of footfall across the centre, however it was busiest at the Tesco Express and North Harrow train station. There was heavy traffic along Pinner Road at the time of the visit.

Environmental Quality

A2.89 North Harrow is a relatively attractive centre. The surrounding residential areas were more attractive than the High Street area, where litter and cracked pavements detracted slightly from the quality of the centre. The frontages along the main high street are generally well maintained throughout the centre and trees line the northern half of the High Street. The centre would benefit from some additional landscaping, perhaps in the form of trees or flower planting.

Figure A2.17 North Harrow District Centre

Supermarkets in the Centre

A2.90 There is a Tesco Express in the site boundary. The Tesco Express was not busy at the time of the visit. There was one till open and there were a few self-checkouts in use. The store stocked majority food, with some non-food items at a ratio of approximately 90:10.

Summary

A2.91 North Harrow is a small but healthy centre, providing a good range of convenience and comparison retailers and other services. The centre has a low vacancy rate and independent retailers dominated the High Street. North Harrow has good provision of food and beverage establishments and there are additional supermarkets which border the centre. North Harrow performs an important retail role for residents in the local area.

South Harrow

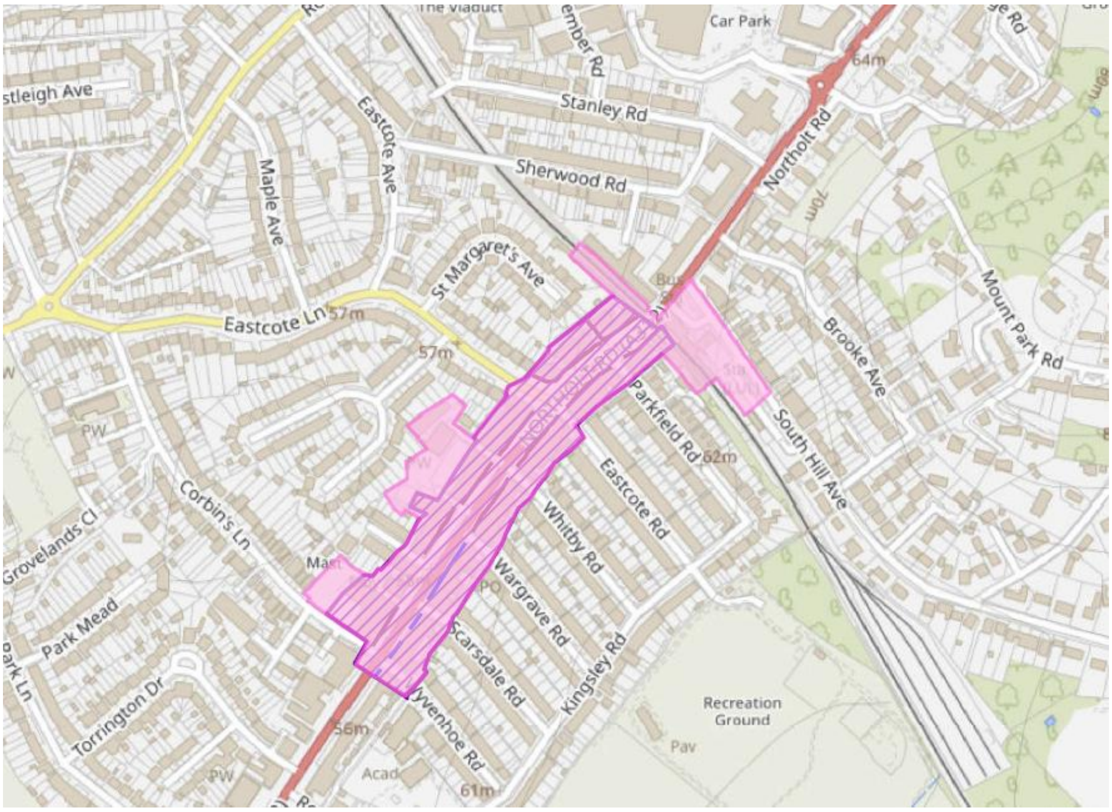
Type of Centre

A2.93 South Harrow is identified as a District Centre in the LB Harrow Local Plan Core Strategy, and is the smallest centre within the Borough.

Physical Structure of the Centre

A2.94 The centre is linear running along the A312 from South Harrow Underground Station south to the Wyvenhoe Road junction. The primary shopping frontage covers most of the northern/western side of Northolt Road and on the southern/eastern side of the road to the junction with Wargrave Road. The secondary shopping frontage covers the rest of the southern/eastern side of Northolt Road from the junction with Wargrave Road to just past Wyvenhoe Road.

Figure A2.18 South Harrow District Centre



Source: LB Harrow Local Plan Core Strategy

Retailer Representation

A2.95 In terms of convenience stores, the centre includes an Iceland and Aldi. There are also a number of independent convenience stores including several newsagents, and a large food centre.

A2.96 There was a fairly limited offering by way of comparison retailers. These included a few high street names including Poundland and Savers, and independent stores including a pharmacy, jewellers, and homeware store.

Diversity of Uses

A2.97 The centre has a wide range of food and beverage units. These includes independent hot food takeaways, cafes, and restaurants. There was also provision of some other services including a post office, accountants, solicitors and a dentist.

Figure A2.19 South Harrow District Centre

Vacancy Rates

A2.98 There were very few vacant units and there was no apparent clustering of such vacancies.

A2.99 The Harrow Economic Needs Study Town Centres and Office Update (2024) indicates that in 2023 the centre had just one vacant unit, which is substantially below the UK average. Our site visit (July 2025) found that this figure has not changed. This very low vacancy rate is a positive indication of the attraction and performance of the centre, and the key role it plays for local residents.

Accessibility and Pedestrian Flows

A2.100 Northolt Road is a key thoroughfare in the London Borough of Harrow, and is well-served by a variety of bus stops that provide access to Harrow town centre, Alperton and Northolt. South Harrow station is served by the Piccadilly Line towards Central London and Cockfosters.

A2.101 There is a good provision of cycle parking along Northolt Road and the pavements are very wide. The centre is accessible for all prospective users. There is substantial parking availability on the side of Northolt Road, and on side roads.

A2.102 The centre was busy at the time of the visit. There was a consistent flow of pedestrians throughout the centre and many shops were busy with customers.

Environmental Quality

A2.103 The centre is dominated by heavy traffic along Northolt Road, which is not softened by any landscaping. This slightly erodes the centre's quality. However, the centre is largely free of litter and graffiti. Shops generally have very active frontages with some greengrocers occupying pavement space to stock goods, which improves the centre's attractiveness.

Figure A2.20 South Harrow District Centre

Supermarkets in the Centre

A2.104 The centre has an Aldi store, which had a car park occupancy rate of 70% at the time of the visit (lunchtime). The store was relatively busy at the time of the visit with five of nine self-checkouts open and three staff checkouts open. The majority of the store consisted of convenience goods, with a small selection of non-food items at a 90:10 split.

A2.105 The centre also has an Iceland which is fairly small. This store consists of two staff checkouts and three self-tills; one staff checkout was open and all self service tills were open. The majority of the store consisted of convenience goods, with a small selection of non-food items at a 90:10 split.

Edge of Centre Supermarket Provision

A2.106 There is an Asda south of the centre boundary which consisted of a medium-sized car park had a car park occupancy rate of 40% at the time of the visit. Eight out of 10 self service checkouts were open. The store offered a mix of food and small selection of non-food items, at a circa 90:10 split.

A2.107 A Waitrose store is located 200m north of the centre boundary. At the time of the visit, the car park had an occupancy rate of 80%. The store was relatively busy with two out of four checkouts open, and nine of 12 self-service tills open. The majority of the store consisted of convenience goods, with a small selection of non-food items with a 90:10 split.

Summary

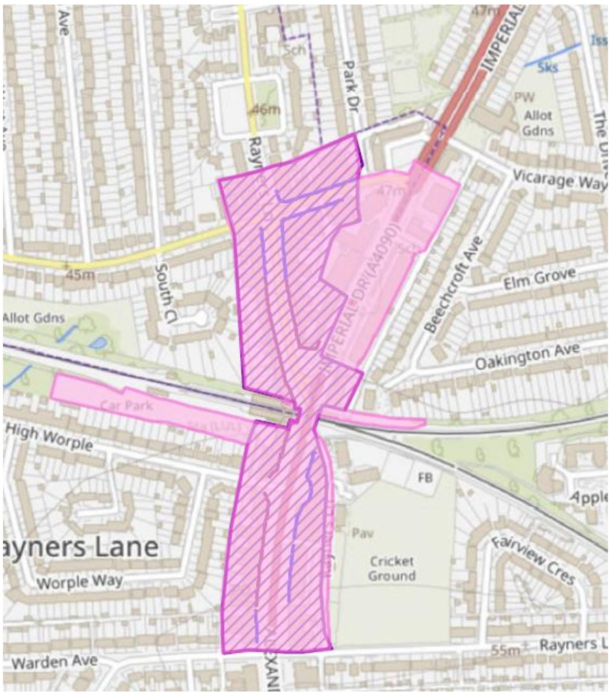
A2.108 South Harrow is a diverse and well-connected centre. The area remains active and functional, with a mix of retail, residential and community uses. The centre plays a key role for local residents, providing a good mix of retail and other services.

Rayners Lane

Type of Centre

A2.109 Rayners Lane is defined as a District Centre in the LB Harrow Local Plan Core Strategy.

Figure A2.21 Rayners Lane District Centre



Source: LB Harrow Local Plan Core Strategy

Physical Structure of Centre

A2.110 The Primary Shopping Area is predominantly located along Rayners Lane and Imperial Lane which runs through the middle of the centre in a high street style format.

A2.111 The centre is a reasonable size, extending circa 280m south and 290m north of Rayners Lane Station.

Retailer Representation

A2.112 In terms of convenience stores, the centre contains an Iceland, a Sainsbury's Local and several small, independent newsagents.

A2.113 Rayners Lane provides some independent comparison retailers. These include a number of pharmacies, a kitchen shop, a phone shop, a DIY shop, and other shops stocking household goods.

Diversity of Uses

A2.114 There are a number of additional services within the centre, including a betting shop, a barbers/hairdresser, pubs, and a nail shop. There is a high concentration of independent hot food takeaways at the north end of the centre and chain establishments such as KFC, Costa and Subway are present throughout the centre.

A2.115 There is residential above the majority of the units on Rayners Lane.

Figure A2.22 Rayners Lane District Centre

Vacancy Rates

A2.116 Generally, Rayners Lane is a healthy centre. There were very few vacant units, and units that were vacant were small and not clustered in one area.

A2.117 This is noted in the Harrow Economic Needs Study Town Centres and Office Update (2024) which recognises that the centre has a low vacancy level compared to the UK average. This study noted that there were four vacant units in 2023. Our study visit (July 2025) found there were three vacant units in the centre. This low vacancy rate is a positive indication of the attraction and performance of the centre.

Accessibility and Pedestrian Movement

A2.118 The centre is well connected, served by Rayners Lane Station alongside multiple bus stops connecting the centre with surrounding areas.

A2.119 Pedestrian flows were concentrated northeast of the centre towards the Sainsbury's and surrounding Rayners Lane Station. Imperial Lane was noticeably more quiet.

A2.120 There was heavy traffic at the time of the visit and minimal parking in the centre aside from Rayners Lane Station car park which was approximately 40% full at the time of the visit. There are a number of roads in the surrounding area which do not have parking restrictions.

Environmental Quality

A2.121 Rayners lane is a moderately attractive town centre, and the overall environmental quality of the centre is good. The centre is clean, largely free of litter and includes a cycle path which runs through the centre. There are trees lining the high street, and this soft landscaping benefits the overall environment. The traffic was busy at the time of the visit, and the centre is dominated by large, multi-lane roads which somewhat detracts from the overall quality.

Figure A2.23 Rayners Lane District Centre

Supermarkets in the Centre

A2.122 There is an Iceland in the centre boundary, which was relatively busy at the time of visit. Two out of two checkouts were open, and the store stocked majority food with some non-food items at a ratio of approximately 90:10.

A2.123 There is also a Sainsbury's Local within the boundary which was reasonably busy at the time of the visit. One of two checkouts was open and two self-checkouts were available. The store stocked majority food with minimal non-food items at a ratio of approximately 95:5.

Summary

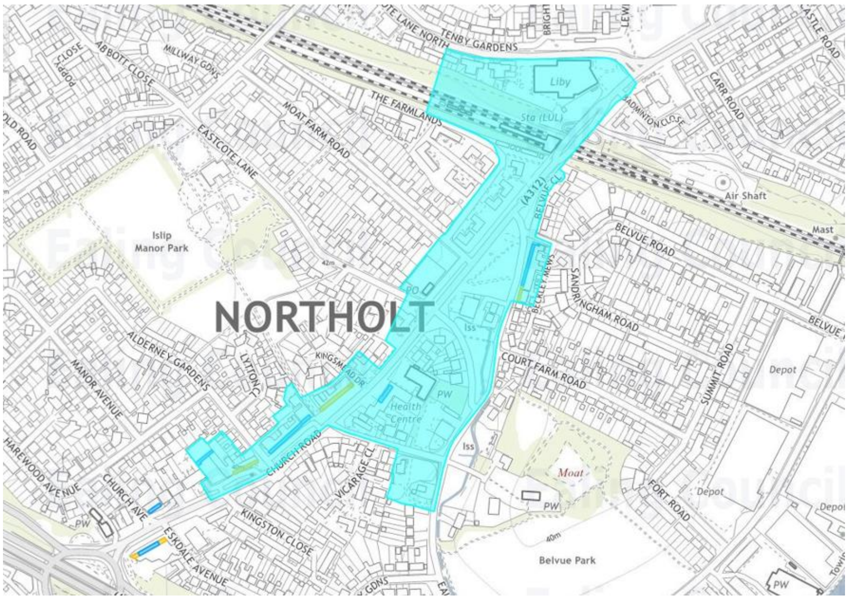
A2.124 Rayners lane is a healthy centre providing a good range of comparison and convenience facilities. It has a good offer of food and beverage establishments as well as other services, performing an important retail role, serving the centre and surrounding area beyond.

Northolt

Type of Centre

A2.125 Northolt is defined as a Neighbourhood Centre in the LB Ealing Local Plan and LB Ealing Town Centre Health Check (2022).

Figure A2.24 Northolt Neighbourhood Centre



Source: LB Ealing Local Plan

Physical Structure of the Centre

A2.126 Northolt is a small centre and is focused around two main shopping parades and leisure facilities. The shopping parades are connected by a Sainsbury's Local, and the adjacent green space to the north. The centre boundary includes a number of residential properties which line Mandeville Road and Ealing Road.

Retailer Representation

A2.127 In terms of convenience stores, the centre contains a Sainsbury's Local, Co Op Food and Londis. There are also a few independent convenience retailers including newsagents, butchers, and greengrocers. The range of services in addition to retail was wide considering the size of the centre and these provide good day and night time services.

A2.128 The comparison retail offering is limited to a discount store, furniture store, pharmacy and craft store.

Diversity of Uses

A2.129 There are a number of other services within the centre, including hairdressers/barbers, nail stores, betting shops, hot food takeaways, vet centre, cafes, and restaurants. There were also civic and leisure uses, including a library and leisure centre, as well as religious sites.

A2.130 There is residential above the majority of the units in the centre.

Figure A2.25 Northolt Neighbourhood Centre

Vacancy Rates

A2.131 Generally, Northolt is a healthy centre. There were very few vacant units, and units that were vacant were small and not clustered in one area.

A2.132 This is noted in the LB Ealing Town Centre Health Check (2022) which recognises that the centre has a low vacancy level compared to the UK average. This study noted that there were two vacant units in 2022. Our site visit (July 2025) found that this figure has not changed. This low vacancy rate is a positive indication of the attraction and performance of the centre.

Accessibility and Pedestrian Movement

A2.133 Northolt Neighbourhood Centre is served by Northolt station providing access to central London. There are also bus stops in the centre along the High Street providing connectivity to surrounding town centres within the borough and neighbouring boroughs. The centre has excellent public transport connectivity. There is also zebra crossings located in both major and minor roads of the centre providing easy access to shops and services for all groups. There are a number of surrounding roads providing unrestricted car parking. These were all very busy.

A2.134 The centre was fairly busy at the time of the visit, with footfall consistent across the centre. The pavements were fairly wide, and the centre appeared accessible for all prospective users.

Environmental Quality

A2.135 Northolt is an attractive centre with a number of green spaces and soft landscaping which alleviates the centre's urban feel. The centre was free of litter, and although there was some graffiti present, this did not detract from the centre's overall quality.

Figure A2.26 Northolt Neighbourhood Centre

Supermarkets in the Centre

A2.136 There is a Sainsbury's Local in the PSA. The store was moderately busy at the time of the visit with the two staff checkouts and three self service checkouts open. The small car park was 100% full. The store offers a mix of food and small selection of non-food items, about 90:10 split.

A2.137 There is a Co Op Food located in the PSA. The store was moderately busy at the time of the visit with one of two staff checkouts open, and three self service tills open.

Summary

A2.138 Northolt Neighbourhood Centre is a relatively healthy centre providing a range of comparison and convenience facilities. The centre is characterised by a mix of independent retailers, and good provision of food and beverage establishments, as well as a wide range of services.

Uxbridge

Type of Centre

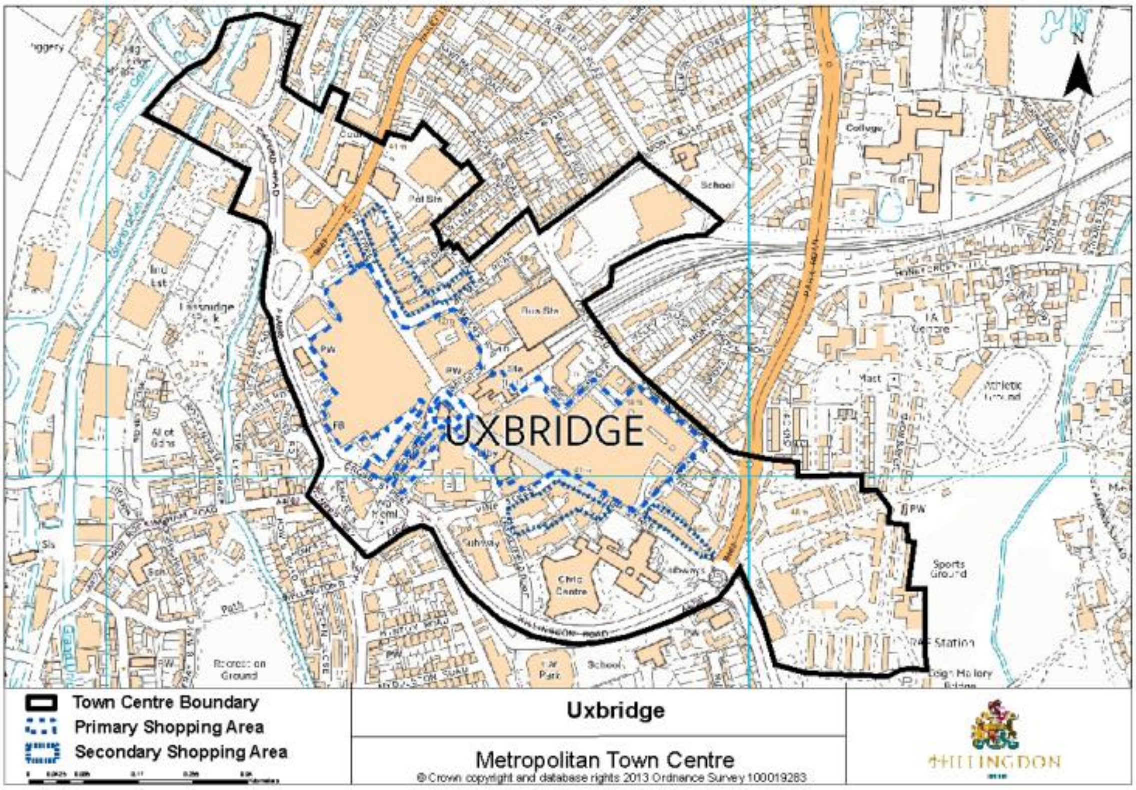
A2.139 Uxbridge is defined as a Town Centre in the LB Hillingdon Local Plan Part 2 and a Metropolitan Centre in the London Plan. Uxbridge is a large town centre with an abundance of retail and other services across the centre.

Physical Structure of the Centre

A2.140 The town centre contains Primary and Secondary Shopping Areas, which form the PSA in retail policy terms. The centre extends east and west of the High Street, which runs vertically through the centre, containing many units in a linear high street style. It also includes The Pavilions shopping centre to the west and The Chimes shopping centre to the east. The PSA is at the mid point of the town centre.

A2.141 The town centre boundary also includes the large Sainsbury's store to the north east, which is outside the PSA, and extends south to include a number of private and public offices.

Figure A2.27 Uxbridge Town Centre



Source: LB Hillingdon Local Plan Part 2

Retail Composition

A2.142 The composition of the centre's retail and service officer is shown in Table A2.1 below, based on Goad data from November 2024. It should be noted that the Goad plan (see Figure A2.28) covers a wider area than the defined Primary Shopping Area.

Table A2.1 Composition of Uxbridge Centre

Type	Number of units	% of units	UK average
Convenience goods retail	27	8.2%	9.9%
Comparison goods retail	121	36.6%	28.2%
Financial/professionals services	24	7.2%	8.1%
Restaurants/cafes	39	11.8%	11.2%
Pubs/bars	11	3.4%	5.2%
Fast/hot food takeaways	24	7.3%	6.4%
Other non retail services	51	15.5%	16.1%
Vacant	33	10.0%	14.8%
Total	**330**	**100%**	**100%**

Source: Goad for Uxbridge November 2024, UK average figure from GOAD March 2025

A2.143 Table A2.1 shows there are 330 outlets in Uxbridge.

Comparison Shopping

A2.144 Comparison retailers in the centre account for 36.6% of all the town centre's outlets, which is slightly higher than the UK national average in 2025 of 28.2%.

A2.145 The centre has a good representation and range of comparison retailers. There is a relatively high number of clothing stores, including ladies & men's wear and accessories, and toiletries/cosmetic/beauty product stores within the centre.

Convenience Shopping

A2.146 Uxbridge has 27 convenience stores, including M&S, Iceland, Lidl and Tesco Express. The other food and convenience stores in the town centre include six bakeries, three delicatessens, three health food stores and one butchers. Overall, Uxbridge has a good food convenience offer to cater for both the 'bulk' and 'top up' food shopping needs of its catchment population.

Multiple and Independent Retail Representation

A2.147 In terms of convenience stores, the centre contains reasonable provision of both chain stores such as an M&S, Iceland and Tesco, and independent convenience stores.

A2.148 The comparison retail offer was good, with large chain comparison retailers such as Next, Waterstones and H&M. Other independent retail stores in the centre include a phone repair shop, a nail shop and multiple independent clothing stores. High profile brands are set out in the table as follows.

Table A2.2 Multiple Representation in Uxbridge

Marks and Spencer	Iceland	Next	Waterstones
H&M	McDonald's	H Samuel	Deichmann
Primark	Boots	Rituals	Lidl
Vodafone	Card Factory	TK Maxx	T G Jones

Figure A2.28 Uxbridge GOAD, November 2024

Source: Experian GOAD

Service Provision

A2.149 The number of service businesses in the town centre is 87, which represents 26.3% of total units. The category with the highest proportion of units is restaurants & cafes, representing 11.9% of total units in the town centre which is consistent with the national average. The food and drink offer includes a number of well known cafes and restaurant chains including Costa, Nando's and Prezzo. The total number of pubs in the centre is below the national average. The number of hot food take aways is consistent with the national average. There are several well known takeaway brands in the centre including KFC, Burger King and McDonald's. The centre also contains good provision of independent food and beverage units, with a number of independent cafes and pubs.

A2.150 There is a good provision of non-retail services, including beauty salons, hairdressers and betting offices. The centre also includes private sector offices, places of worship, a cinema, bowling alley and other social facilities.

Figure A2.29 Uxbridge Town Centre

Vacancy Rates

A2.151 The GOAD data indicates there were 33 vacant units in Uxbridge town centre in November 2024, giving a vacancy rate of 10% which is well below the UK average. The site visit in July 2025 identified 32 vacant units in the centre. The former Debenhams, a large unit in The Chimes Shopping Centre, is now occupied by Hollywood Bowl.

Figure A2.30 Uxbridge Town Centre

Accessibility and Pedestrian Flows

A2.152 Uxbridge forms the end of both the Piccadilly and Metropolitan lines. The station is well placed within the town centre, and alongside the bus stops across the centre, connects Uxbridge with the wider area well.

A2.153 The centre is pedestrian friendly, with wide pavements and is highly accessible to all prospective users of the

A2.154 Pedestrian flows were most concentrated on the pedestrianised high street. The centre is accompanied by multiple car parking facilities, with the Chimes shopping centre car park being at approximately 30% capacity. The centre is served well by other car parking facilities include Grainges multi storey car park and Cedar’s car park, which are both central to the centre boundary.

Environmental Quality

A2.155 Uxbridge is an attractive centre with a unique sense of character due to the historic nature of the town. Building frontages are well kept and there are small pockets of historic buildings which accommodate both independent and chain retailers. There is soft landscaping across the town centre which further improves the overall quality. There was little sign of litter, graffiti and vandalism.

Supermarkets in the Centre

A2.156 The Lidl store in the town centre is a reasonable size, with four staff checkouts and ten self-services. The store was relatively busy at the time of our visit. The store stocked majority food items with some non-food items at the ratio of approximately 80:20.

A2.157 The Tesco Express is a similar size to the Lidl, also with four staffed checkouts and ten self-checkouts. The store was reasonably busy at the time of our visit. The store stocked majority food items with minimal non-food items at a ratio of approximately 90:10.

A2.158 The small Iceland store has four staff checkouts and no self-checkouts available in the store. The store was quite busy at the time of our visit. The store stocked majority food items with minimal non-food items at a ratio of 90:10.

A2.159 The M&S food hall is located within a full line M&S store in the centre. The food hall has four staffed checkouts and ten self-checkouts. The M&S was reasonably busy at the time of our visit.

Edge of Centre Provision

A2.160 There is a large Sainsbury's Supermarket along Belmont Road, just to the north of the PSA. This has a customer only car park which was only about 25% full at the time of the visit, however other car parks in the area were busy. At the time of the visit, the store was relatively busy. The store has 10 staff tills along with a number of self checkout tills. The store stocked a range of food and non-food items at a ratio of approximately 80:20.

Summary

A2.161 Uxbridge is a healthy, viable centre providing a good range of comparison, convenience and other facilities. Uxbridge is an attractive area, particularly due to the historical nature of the town, and importantly supports the communities within and surrounding Uxbridge.

Harrow

Type of Centre

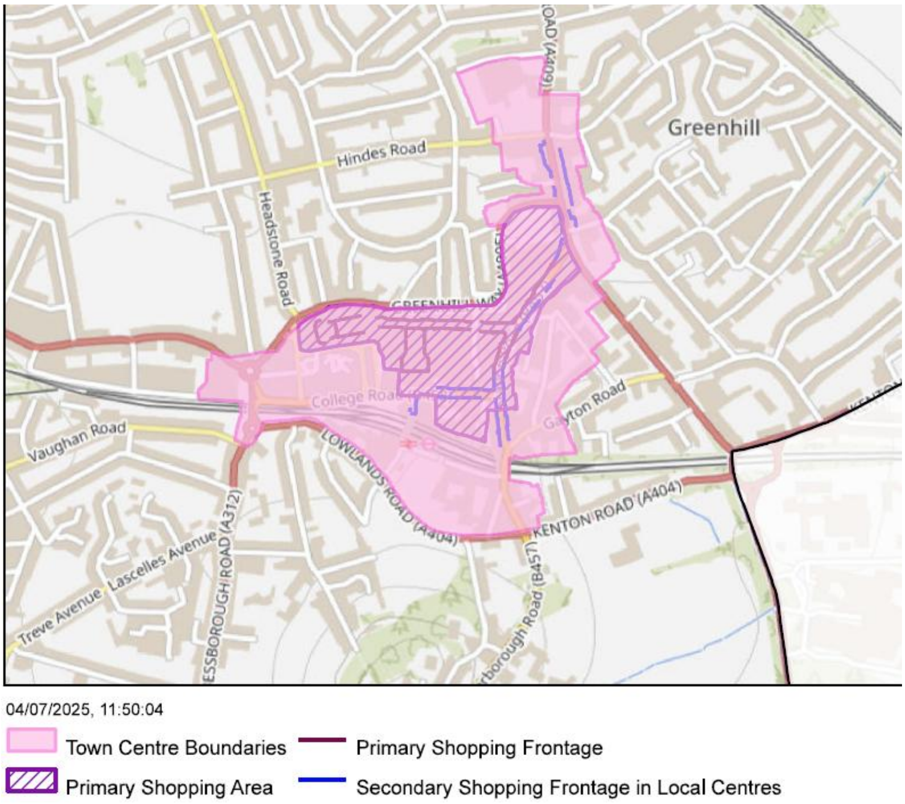
A2.162 Harrow is defined as a Town Centre in the LB Harrow Local Plan Core Strategy, and a Metropolitan Centre in the London Plan. It sits at the top of the Harrow Retail Hierarchy.

Physical Structure of the Centre

A2.163 The defined primary frontage comprises St Ann's Shopping Centre, St George's Shopping Centre, St Ann's Road and parts of Station Road closest to the junction of St Ann's Road. The primary frontage sits wholly to the north of Harrow-on-the-Hill station. The secondary frontage comprises parts of Station Road north towards the Tesco superstore and south towards the railway line, as well as parts of Central Parade, College Road and outside the Harrow-on-the-Hill train station.

A2.164 Harrow is a larger town centre with retail and other services throughout.

Figure A2.31 Harrow Town Centre



Source: LB Harrow Local Plan

Retail Composition

A2.165 The composition of the centre's retail and service officer is shown in Table A2.3 below, based on Goad data from July 2024. It should be noted that the Goad plan (see Figure A2.32) covers a wider area than the defined Primary Shopping Area. Table A2.3 shows there are 353 outlets in Harrow.

Table A2.3 Composition of Harrow Town Centre

Type	Number of units	% of units	UK average
Convenience goods retail	44	12.5%	9.9%
Comparison goods retail	77	21.9%	28.2%
Financial/professionals services	43	12.9%	8.1%
Restaurants/cafes	44	12.5%	11.2%
Pubs/bars	9	2.5%	5.2%
Fast/hot food takeaways	34	9.6%	6.4%
Other non retail services	58	16.4%	16.1%
Vacant	44	12.5%	14.8%
Total	**353**	**100%**	**100%**

Source: Goad for Harrow July 2024, UK average figure from GOAD March 2025

Comparison Shopping

A2.166 Comparison retailers in the centre account for 21.9% of all the town centre's outlets, which is slightly under the UK national average of 28.2%. The latest GOAD data shows there are a number of retailers in wide ranging comparison goods categories.

A2.167 There is a high proportion of clothing, health and beauty, and charity shops. The centre has reasonably good representation of comparison retailers, although some categories including crafts, florists and antique stores are not represented. The comparison goods offering is underpinned by a number of well known high street brands occupying large units, as well as smaller independent stores selling jewellery, gifts, and cards.

Convenience Shopping

A2.168 Harrow town centre has 44 convenience stores, with an M&S, Morrisons and Lidl acting as the anchor stores. Other food and convenience stores in the town centres include bakeries, butchers, off licences, and newsagents.

A2.169 Overall, Harrow has a good food convenience offer to cater for the 'bulk' and 'top up' food shopping needs of its catchment population.

Multiple and Independent Retail Representation

A2.170 In terms of convenience stores, the centre contains reasonable provision of both chain stores such as an M&S and Morrisons, and independent convenience stores.

A2.171 The comparison retail offer is good, with large chain comparison retailers such as Next, Waterstones and H&M. Other independent retail stores in the centre include a phone repair shop, a nail shop and multiple independent clothing stores. High profile brands are set out in the table as follows.

Table A2.4 Multiple Representation in Harrow

Marks and Spencer	Morrisons	Next	Waterstones
H&M	McDonald's	Superdrug	Deichmann
Primark	Boots	B&Q	Lidl
Shoezone	B&M	TK Maxx	T G Jones

Figure A2.32 Harrow GOAD, July 2024

Source: Experian GOAD

Service Provision

A2.172 The number of service businesses in the town is 107, which represents 30.3% of total units. The category with the highest proportion of units is fast food & takeaway, representing 9% of the total units in the town centre. The food and drink offering includes a number of well known café and restaurant chains like Costa, Nando's and Prezzo. There are several well known takeaway brands in the centre including KFC, McDonald's, Burger King, and a JD Wetherspoon pub. The centre also contains a good provision of independent food and beverage units, with a number of independent restaurants.

A2.173 The centre includes public and private sector offices, a library, places of worship, a cinema, civic facilities, and other social facilities. There is good provision of independent hairdressers and nail salons. The service provision in Harrow is good.

Vacancy Rate

A2.174 Experian GOAD data from July 2024 identified 44 vacant units in Harrow. This equates to a circa 12.5% vacancy rate which is below the UK average of 14.8%.

A2.175 The Harrow Economic Needs Study Town Centres and Office Update (2024) does not address new investment in Harrow town centre. From our site visit undertaken in July 2025, it is understood that the vacant former Debenhams unit presents an investment opportunity. This is currently being pursued by Iceland Foods Limited.

Figure A2.33 Harrow Town Centre

Accessibility and Pedestrian Flows

A2.176 Harrow Town Centre has good accessibility. Harrow on the Hill train station at the southern end of the centre provides services into and outside of London, with the bus stops throughout the town connecting the centre to surrounding towns.

A2.177 The centre is served well by car parking facilities including two multi storey parking facilities. St Georges Mall provides a large car park; other car parks include St Annes, the station car park and the car park attached to Morrisons. Most car parks were busy, averaging approximately 60% capacity on average. Morrisons car park offered electric charging ports and car washing services.

A2.178 The town was busy throughout; however pedestrian flows were most concentrated along the pedestrianised section of St Ann's Road. There are plentiful pedestrian crossings, and the centre is accessible for all pedestrians.

Figure A2.34 Harrow Town Centre

Environmental Quality

A2.179 Harrow is an attractive town, and the overall environmental quality of the centre is good. There is minimal evidence of graffiti or vandalism, and the centre is largely free of litter. There is good provision of street furniture and several cafes and food establishments providing outdoor seating for customers.

A2.180 There is limited green space across the centre, however Lowlands recreation ground which is found on the southern border of the centre, compensates for this.

Supermarkets in the Centre

A2.181 There is a Morrisons in the centre boundary, which was reasonably busy at the time of the visit. The car park was at approximately 40% capacity with two of ten checkouts open and three of twenty-four self-checkouts open. There was a bakery and a hot food takeaway counter.

A2.182 The M&S food hall is located within a full line M&S store in the centre. The M&S was moderately busy at the time of the visit. Three of five checkouts were open, and four of eight self service checkouts were open.

A2.183 The Lidl in the centre boundary was not observed to be busy at the time of the visit. All fourteen self-checkouts were open and neither of the two till checkouts was open. The store stocked majority food items with the convenience to comparison ratio approximately 70:30.

A2.184 The B&M was relatively busy at the time of the visit. Three of four self-checkouts were open and one of two till checkouts was open. The store stocked majority non food items with the convenience to comparison ratio sitting at 60:40.

A2.185 All store visits in Harrow were undertaken between 10.30am-11am.

Summary

A2.186 Harrow is a healthy, important and viable town centre providing a good range of comparison, convenience and service facilities. It comprises an attractive centre and performs an important retail role to residents and members of the wider community.

Pinner

A2.187 Pinner District Centre is located beyond the 10 minute drivetime. As part of the site visit, the following stores within the centre were visited.

M&S Simply Food, Bishops Walk, Pinner, HA5 5QQ

A2.188 At the time of the visit, the store was relatively busy. The store has four staffed checkouts and six self-checkouts. The store stocked majority food with some non-food items at a ratio of approximately 90:10. The store had a car park at the front which was approximately 40% full at the time of visit.

Sainsbury's, 12 Barters Walk, Pinner, HA5 5LU

A2.189 At the time of the visit the store was reasonably busy. All 10 self service tills were open, and two of six staffed tills were open. The store stocked majority food, with some non-food items at a ratio of approximately 80:20. The store had a car park at the front which was approximately 35% full at the time of visit.

Out of Centre Provision

<u>Lidl, Victoria Road, Ruislip, HA4 0QQ</u>

A2.190 There is a Lidl store 0.5 km north east of the site. The store was relatively busy at the time of the visit, with the car park at approximately 60% capacity. Two of five staff checkouts were open, and four of six self service tills were open. The store stocked primarily convenience items with a small provision of comparison items at a ratio of 75:25.

<u>Aldi, Victoria Retail Park, Ruislip, HA4 0EH</u>

A2.191 There is an Aldi store 1.1 km north west of the site. The store was busy at the time of the visit, with the car park (shared with B&M) at around 65% capacity. Three of three staff checkouts were in use and all eight checkouts in the self-serve area were in use. The store stocked predominantly convenience items, with the middle aisle providing a limited amount of comparison goods. The convenience comparison split was approximately 90:10.

<u>B&M, Victoria Retail Park, HA4 0EH</u>

A2.192 There is a B&M store 1.1 km north west of the site. B&M was busy at the time of the visit, with four of five staffed checkouts open. There was no self-serve area in this store. The car park (shared with the neighbouring Aldi) was also around 65% full. The store stocked mainly comparison goods, with the comparison convenience split at around 70:30.

<u>Lidl, Ruislip Road, Northolt, UB5 5PQ</u>

A2.193 There is a Lidl 4 km south of the site. At the time of the visit, the store was busy with the car park capacity was at approximately 60%. Sixteen self-checkouts open and seven of eight staffed checkouts were in use. The store stocked mostly convenience items with the convenience comparison split at approximately 85:15.

<u>Tesco Extra, Glencoe Road, UB4 9SQ</u>

A2.194 There is a Tesco Extra 5.6 km south of the site. The store was busy at the time of the visit with the car park at approximately 60% capacity. Half of the self-serve checkouts were open and two of six staffed checkouts were open and being used. The store stocked mainly convenience items with the convenience comparison split at approximately 70:30. The store also had a costa coffee attached.

<u>B&M Northolt, Glencoe Road, UB4 9SN</u>

A2.195 There is a B&M 5.6 km south of the site. At the time of the visit the car park was approximately 50% full. The store did not have self-serve checkouts, however three of five staffed checkouts were open and in use. The store was relatively busy and had a comparison convenience split of approximately 60:40, stocking predominantly convenience items.

<u>Tesco Superstore, Station Road, Harrow, HA1 2TU</u>

A2.196 A Tesco Superstore is 5.8 km north east of the site. The store was relatively quiet at the time of the visit, with ten self-checkouts available and four open. Two out of five staffed checkouts were open. The store provides a good range of convenience comparison goods at an approximate ratio of 80:20.

Sainsbury's Superstore, Kenton Road, Harrow, HA3 0JA

A2.197 There is a Sainsbury's located 6 km north of the site. At the time of visiting, the store was not particularly busy. Three out of three checkouts were closed, and four out of twelve self-checkouts were open. The store stocked majority food, with some non-food items at a ratio of approximately 80:20. The store had a car park at the front which was approximately 40% full at the time of visit.

Appendix 3 Retail Impact Assessment

Table 1: Study Area Population

Zone	2023	2025	2028	2031
Zone 1 - South Ruislip	52,082	52,335	52,631	52,764
Zone 2 - Harrow West	75,859	75,809	75,740	75,679
Zone 3 - Northolt	31,973	31,805	31,660	31,670
Zone 4 - Uxbridge East	39,459	39,738	40,105	40,397
Zone 5 - Uxbridge	20,011	20,096	20,149	20,207
Total	**219,384**	**219,783**	**220,285**	**220,717**

Sources: Experian Population Estimates and Projections (March 2025)

Table 2: Convenience Goods Expenditure per person (£)

Zone	2023	2025	2028	2031
Zone 1 - South Ruislip	2,608	2,535	2,492	2,459
Zone 2 - Harrow West	2,224	2,162	2,125	2,097
Zone 3 - Northolt	2,088	2,030	1,995	1,969
Zone 4 - Uxbridge East	2,353	2,288	2,248	2,219
Zone 5 - Uxbridge	2,837	2,758	2,711	2,675

Sources:
Experian Local Expenditure 2023 (2023 prices)
Growth Rates:-1.8% 2023-2024, -0.8% 2024-2025, -0.6% 2025-2026, -0.3% p.a. 2026-2031
Experian Briefing Note 22 March 2025
Excludes Special Forms of Trading

Table 3: Total Convenience Goods Expenditure (£m)

Zone	2023	2025	2028	2031
Zone 1 - South Ruislip	135.82	132.67	131.13	129.73
Zone 2 - Harrow West	168.72	163.90	160.94	158.69
Zone 3 - Northolt	66.76	64.55	63.16	62.34
Zone 4 - Uxbridge East	92.86	90.91	90.17	89.63
Zone 5 - Uxbridge	56.78	55.43	54.62	54.05
Total	**520.93**	**507.46**	**500.02**	**494.45**

Source: Tables 1 and 2

Table 4: Base Year Convenience Goods Market Shares (%)

Centre/Facility	Zone 1 South Ruislip	Zone 2 Harrow West	Zone 3 Northolt	Zone 4 Uxbridge East	Zone 5 Uxbridge	Inflow
ZONE 1						
South Ruislip Local Centre						
Sainsbury's, Long Drive	17.5%	8.1%	4.6%	0.3%	3.1%	10.0%
South Ruislip Out of Centre						
Aldi, Victoria Road	6.0%	0.6%	1.2%	1.1%	3.0%	5.0%
Lidl, Victoria Road	3.5%	1.4%	2.3%	0.0%	1.3%	5.0%
Asda, Old Dairy Lane	17.5%	2.3%	3.1%	1.0%	0.8%	10.0%
Ruislip Manor Minor Centre	3.8%	0.3%	0.0%	0.0%	0.0%	5.0%
Eastcote District Centre	5.1%	3.6%	1.2%	0.0%	0.7%	5.0%
Ruislip District Centre						
Waitrose, Kingsend	7.2%	0.2%	0.7%	4.0%	11.6%	30.0%
Other Ruislip District Centre	12.8%	4.9%	1.9%	0.2%	0.9%	30.0%
Other Zone 1	3.6%	0.1%	1.6%	0.0%	0.0%	5.0%
TOTAL ZONE 1	**77.0%**	**21.5%**	**16.6%**	**6.6%**	**21.4%**	
ZONE 2						
North Harrow District Centre	0.0%	1.1%	0.0%	0.0%	0.0%	10.0%
South Harrow District Centre	0.9%	7.9%	6.5%	0.7%	0.0%	10.0%
Waitrose, Northolt Road, South Harrow (out of centre)	0.1%	6.0%	1.6%	1.0%	0.0%	40.0%
Rayners Lane District Centre	0.9%	9.8%	0.0%	0.0%	0.0%	10.0%
Pinner District Centre						
M&S Simply Food, Bishops Walk, Pinner	2.1%	2.1%	1.1%	0.0%	0.0%	50.0%
Sainsbury's, Barters Walk, Pinner	3.9%	8.3%	0.0%	0.4%	0.7%	50.0%
Other Pinner District Centre	0.1%	0.1%	0.0%	0.0%	0.0%	50.0%
Pinner Out of Centre stores	4.8%	4.9%	0.5%	0.0%	0.3%	60.0%
Other Zone 2	0.3%	7.0%	1.6%	0.0%	0.0%	5.0%
TOTAL ZONE 2	**13.1%**	**47.2%**	**11.3%**	**2.1%**	**1.0%**	
ZONE 3						
Northolt District Centre	0.1%	2.1%	15.5%	0.0%	0.0%	5.0%
Lidl, Ruislip Road (out of centre)	0.0%	0.7%	2.9%	0.0%	0.0%	50.0%
Other Zone 3	0.0%	0.0%	7.4%	0.0%	0.0%	5.0%
TOTAL ZONE 3	**0.1%**	**2.8%**	**25.8%**	**0.0%**	**0.0%**	
ZONE 4						
North Hillingdon Local Centre	0.3%	0.6%	0.5%	8.2%	8.6%	5.0%
Other Zone 4	0.0%	0.0%	3.3%	8.8%	1.1%	5.0%
TOTAL ZONE 4	**0.3%**	**0.6%**	**3.8%**	**17.0%**	**9.7%**	
ZONE 5						
Uxbridge Town Centre						
M&S, High Street, Uxbridge	0.7%	0.0%	0.5%	5.7%	4.9%	40.0%
Other Uxbridge Town Centre	0.7%	0.4%	1.1%	10.6%	13.8%	40.0%
Uxbridge out of centre						
Sainsbury's, York Road, Uxbridge	0.0%	0.4%	0.1%	16.1%	20.0%	40.0%
Ickenham Local Centre	0.1%	0.0%	0.7%	2.1%	10.3%	5.0%
Other Zone 5	0.0%	0.0%	0.0%	0.0%	2.2%	5.0%
ZONE 5 TOTAL	**1.5%**	**0.8%**	**2.4%**	**34.5%**	**51.2%**	
OUTSIDE SURVEY AREA						
Harrow Town Centre						
M&S, St. Anns Road, Harrow	0.1%	1.0%	0.1%	0.0%	0.0%	75.0%
Other Harrow Town Centre	0.7%	3.0%	0.1%	1.0%	0.0%	75.0%
Other Outside Survey Area	7.2%	23.1%	39.9%	38.8%	16.7%	
OUTSIDE SURVEY AREA TOTAL	**8.0%**	**27.1%**	**40.1%**	**39.8%**	**16.7%**	
TOTAL	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	

Source: NEMS

Table 5: Convenience Goods Expenditure 2023 (£m)

Centre/Facility	Zone 1 South Ruislip	Zone 2 Harrow West	Zone 3 Northolt	Zone 4 Uxbridge East	Zone 5 Uxbridge	Inflow	Total
Expenditure 2023	**135.82**	**168.72**	**66.76**	**92.86**	**56.78**		
ZONE 1							
South Ruislip Local Centre							
Sainsbury's, Long Drive	23.77	13.67	3.07	0.28	1.76	4.73	**47.27**
South Ruislip Out of Centre							
Aldi, Victoria Road	8.15	1.01	0.80	1.02	1.70	0.67	**13.36**
Lidl, Victoria Road	4.75	2.36	1.54	0.00	0.74	0.49	**9.88**
Asda, Old Dairy Lane	23.77	3.88	2.07	0.93	0.45	3.46	**34.56**
Ruislip Manor Minor Centre	5.16	0.51	0.00	0.00	0.00	0.30	**5.97**
Eastcote District Centre	6.93	6.07	0.80	0.00	0.40	0.75	**14.95**
Ruislip District Centre							
Waitrose, Kingsend	9.78	0.34	0.47	3.71	6.59	8.95	**29.83**
Other Ruislip District Centre	17.39	8.27	1.27	0.19	0.51	11.84	**39.45**
Other Zone 1	4.89	0.17	1.07	0.00	0.00	0.32	**6.45**
TOTAL ZONE 1	**104.58**	**36.27**	**11.08**	**6.13**	**12.15**		
ZONE 2							
North Harrow District Centre	0.00	1.86	0.00	0.00	0.00	0.21	**2.06**
South Harrow District Centre	1.22	13.33	4.34	0.65	0.00	2.17	**21.71**
Waitrose, Northolt Road, South Harrow (out of centre)	0.14	10.12	1.07	0.93	0.00	8.17	**20.43**
Rayners Lane District Centre	1.22	16.53	0.00	0.00	0.00	1.97	**19.73**
Pinner District Centre							
M&S Simply Food, Bishops Walk, Pinner	2.85	3.54	0.73	0.00	0.00	7.13	**14.26**
Sainsbury's, Barters Walk, Pinner	5.30	14.00	0.00	0.37	0.40	20.07	**40.14**
Other Pinner District Centre	0.14	0.17	0.00	0.00	0.00	0.30	**0.61**
Pinner Out of Centre stores	6.52	8.27	0.33	0.00	0.17	22.94	**38.23**
Other Zone 2	0.41	11.81	1.07	0.00	0.00	0.70	**13.98**
TOTAL ZONE 2	**17.79**	**79.63**	**7.54**	**1.95**	**0.57**		
ZONE 3							
Northolt District Centre	0.14	3.54	10.35	0.00	0.00	0.74	**14.76**
Lidl, Ruislip Road (out of centre)	0.00	1.18	1.94	0.00	0.00	3.12	**6.23**
Other Zone 3	0.00	0.00	4.94	0.00	0.00	0.26	**5.20**
TOTAL ZONE 3	**0.14**	**4.72**	**17.22**	**0.00**	**0.00**		
ZONE 4							
North Hillingdon Local Centre	0.41	1.01	0.33	7.61	4.88	0.75	**15.00**
Other Zone 4	0.00	0.00	2.20	8.17	0.62	0.58	**11.58**
TOTAL ZONE 4	**0.41**	**1.01**	**2.54**	**15.79**	**5.51**		
ZONE 5							
Uxbridge Town Centre							
M&S, High Street, Uxbridge	0.95	0.00	0.33	5.29	2.78	6.24	**15.60**
Other Uxbridge Town Centre	0.95	0.67	0.73	9.84	7.84	13.36	**33.40**
Uxbridge out of centre							
Sainsbury's, York Road, Uxbridge	0.00	0.67	0.07	14.95	11.36	18.03	**45.08**
Ickenham Local Centre	0.14	0.00	0.47	1.95	5.85	0.44	**8.84**
Other Zone 5	0.00	0.00	0.00	0.00	1.25	0.07	**1.31**
ZONE 5 TOTAL	**2.04**	**1.35**	**1.60**	**32.04**	**29.07**		
OUTSIDE SURVEY AREA							
Harrow Town Centre							
M&S, St. Anns Road, Harrow	0.14	1.69	0.07	0.00	0.00	5.67	**7.56**
Other Harrow Town Centre	0.95	5.06	0.07	0.93	0.00	21.02	**28.03**
Other Outside Survey Area	9.78	38.97	26.64	36.03	9.48		
OUTSIDE SURVEY AREA TOTAL	**10.87**	**45.72**	**26.77**	**36.96**	**9.48**		
TOTAL	**135.82**	**168.72**	**66.76**	**92.86**	**56.78**		

Source: Tables 3 and 4 (Please note some figures may not total precisely due to rounding)

Table 6: Convenience Goods Expenditure 2025 (£m)

Centre/Facility	Zone 1 South Ruislip	Zone 2 Harrow West	Zone 3 Northolt	Zone 4 Uxbridge East	Zone 5 Uxbridge	Inflow	Total
Expenditure 2025	132.67	163.90	64.55	90.91	55.43		
ZONE 1							
South Ruislip Local Centre							
Sainsbury's, Long Drive	23.22	13.28	2.97	0.27	1.72	4.61	**46.06**
South Ruislip Out of Centre							
Aldi, Victoria Road	7.96	0.98	0.77	1.00	1.66	0.65	**13.03**
Lidl, Victoria Road	4.64	2.29	1.48	0.00	0.72	0.48	**9.62**
Asda, Old Dairy Lane	23.22	3.77	2.00	0.91	0.44	3.37	**33.71**
Ruislip Manor Minor Centre	5.04	0.49	0.00	0.00	0.00	0.29	**5.82**
Eastcote District Centre	6.77	5.90	0.77	0.00	0.39	0.73	**14.56**
Ruislip District Centre							
Waitrose, Kingsend	9.55	0.33	0.45	3.64	6.43	8.74	**29.14**
Other Ruislip District Centre	16.98	8.03	1.23	0.18	0.50	11.54	**38.46**
Other Zone 1	4.78	0.16	1.03	0.00	0.00	0.31	**6.29**
TOTAL ZONE 1	**102.16**	**35.24**	**10.72**	**6.00**	**11.86**		
ZONE 2							
North Harrow District Centre	0.00	1.80	0.00	0.00	0.00	0.20	**2.00**
South Harrow District Centre	1.19	12.95	4.20	0.64	0.00	2.11	**21.08**
Waitrose, Northolt Road, South Harrow (out of centre)	0.13	9.83	1.03	0.91	0.00	7.94	**19.85**
Rayners Lane District Centre	1.19	16.06	0.00	0.00	0.00	1.92	**19.17**
Pinner District Centre							
M&S Simply Food, Bishops Walk, Pinner	2.79	3.44	0.71	0.00	0.00	6.94	**13.88**
Sainsbury's, Barters Walk, Pinner	5.17	13.60	0.00	0.36	0.39	19.53	**39.06**
Other Pinner District Centre	0.13	0.16	0.00	0.00	0.00	0.30	**0.59**
Pinner Out of Centre stores	6.37	8.03	0.32	0.00	0.17	22.33	**37.22**
Other Zone 2	0.40	11.47	1.03	0.00	0.00	0.68	**13.58**
TOTAL ZONE 2	**17.38**	**77.36**	**7.29**	**1.91**	**0.55**		
ZONE 3							
Northolt District Centre	0.13	3.44	10.01	0.00	0.00	0.71	**14.30**
Lidl, Ruislip Road (out of centre)	0.00	1.15	1.87	0.00	0.00	3.02	**6.04**
Other Zone 3	0.00	0.00	4.78	0.00	0.00	0.25	**5.03**
TOTAL ZONE 3	**0.13**	**4.59**	**16.65**	**0.00**	**0.00**		
ZONE 4							
North Hillingdon Local Centre	0.40	0.98	0.32	7.45	4.77	0.73	**14.66**
Other Zone 4	0.00	0.00	2.13	8.00	0.61	0.57	**11.31**
TOTAL ZONE 4	**0.40**	**0.98**	**2.45**	**15.45**	**5.38**		
ZONE 5							
Uxbridge Town Centre							
M&S, High Street, Uxbridge	0.93	0.00	0.32	5.18	2.72	6.10	**15.25**
Other Uxbridge Town Centre	0.93	0.66	0.71	9.64	7.65	13.05	**32.63**
Uxbridge out of centre							
Sainsbury's, York Road, Uxbridge	0.00	0.66	0.06	14.64	11.09	17.63	**44.07**
Ickenham Local Centre	0.13	0.00	0.45	1.91	5.71	0.43	**8.63**
Other Zone 5	0.00	0.00	0.00	0.00	1.22	0.06	**1.28**
ZONE 5 TOTAL	**1.99**	**1.31**	**1.55**	**31.36**	**28.38**		
OUTSIDE SURVEY AREA							
Harrow Town Centre							
M&S, St. Anns Road, Harrow	0.13	1.64	0.06	0.00	0.00	5.51	**7.34**
Other Harrow Town Centre	0.93	4.92	0.06	0.91	0.00	20.46	**27.28**
Other Outside Survey Area	9.55	37.86	25.76	35.27	9.26		
OUTSIDE SURVEY AREA TOTAL	**10.61**	**44.42**	**25.89**	**36.18**	**9.26**		
TOTAL	**132.67**	**163.90**	**64.55**	**90.91**	**55.43**		

Source: Tables 3 and 4 (Please note some figures may not total precisely due to rounding)

Table 7: Convenience Goods Floorspace and Benchmark Turnover 2028

Store	Sales Floorspace (sq.m net)	Convenience Goods Floorspace (%)	Convenience Goods Floorspace (sq.m net)	Turnover (£ per sq.m)	Total Turnover (£m)
ZONE 1					
South Ruislip Local Centre					
Sainsbury's, Long Drive	3,397	92%	3,119	£11,613	£36.22
South Ruislip Out of Centre					
Aldi, Victoria Retail Park	987	91%	900	£11,051	£9.95
Lidl, Victoria Road	1,728	89%	1,545	£7,989	£12.35
Asda, Old Dairy Lane	3,749	71%	2,668	£10,174	£27.14
Eastcote					
Aldi, Field End Road	815	91%	745	£11,051	£8.23
Sainsbury's Local, Field End Road	236	95%	225	£11,613	£2.61
Tesco, Field End Road	355	93%	329	£13,590	£4.47
Ruislip Manor					
Tesco Express, Park Way	225	93%	208	£13,590	£2.83
Ruislip District Centre					
Iceland, High Street	549	100%	546	£7,328	£4.00
Sainsbury's Local, High Street	292	95%	277	£11,613	£3.22
Waitrose, Kingsend	1,900	81%	1,539	£11,477	£17.66
ZONE 2					
North Harrow					
Tesco Express, Pinner Road	344	93%	319	£13,590	£4.34
South Harrow					
Iceland, Northolt Road	373	100%	371	£7,328	£2.72
Aldi, Northolt Road	1,741	91%	1,589	£11,051	£17.56
Asda, Northolt Road (edge of centre)	768	88%	678	£10,174	£6.90
Other Zone 2					
Waitrose, Northolt Road, South Harrow	1,900	81%	1,539	£11,477	£17.66
Pinner District Centre					
M&S Simply Food, Bishops Walk	867	81%	703	£11,569	£8.13
Sainsbury's, Barters Walk	2,783	81%	2,258	£11,613	£26.23
Pinner out of centre					
Lidl, Bridge Street, Pinner	1,393	89%	1,245	£7,989	£9.95
Tesco Superstore, Ash Hill Drive, Pinner	2,342	81%	1,897	£13,590	£25.78
Rayners Lane					
Sainsbury's Local, Rayners Lane	411	95%	391	£11,613	£4.54
Iceland, Rayners Lane	438	100%	437	£7,328	£3.20
ZONE 3					
Northolt District Centre					
Co-op, Church Road	217	80%	174	£10,859	£1.89
Sainsbury's Local, Mandeville Road	218	95%	207	£11,613	£2.41
Other Zone 3					
Tesco Express, Church Road, Northolt	251	93%	233	£13,590	£3.16
Lidl, Ruislip Road, Northolt	1,343	89%	1,200	£7,989	£9.59
ZONE 4					
North Hillingdon Local Centre					
Co-op, Long Lane	184	95%	175	£10,859	£1.90
Other Zone 4					
Iceland, Uxbridge Road, Hayes End	283	100%	282	£7,328	£2.07
Co-op, Kingshill Avenue	229	81%	185	£10,859	£2.01
M&S Simply Food, Hillingdon BP, Uxbridge Road	84	90%	75	£11,569	£0.87
ZONE 5					
Uxbridge Town Centre					
Lidl, High Street, Uxbridge	1,388	89%	1,241	£7,989	£9.91
Tesco Express, High Street	1,331	87%	1,151	£13,590	£15.65
Iceland, Grainge's Yard	403	100%	401	£7,328	£2.94
M&S, High Street, Uxbridge	940	93%	877	£11,569	£10.14
Other Uxbridge Town Centre	1,512	100%	1,512	£5,500	£8.32
Uxbridge Town Centre sub-total					**£46.96**
Uxbridge out of centre					
Sainsbury's, York Road, Uxbridge	3,531	81%	2,860	£11,613	£33.21
Ickenham					
Co-op, Swakeley's Road	185	81%	150	£10,859	£1.63
Other Zone 5					
Tesco Express, High Road	231	93%	214	£13,590	£2.91
OUTSIDE SURVEY AREA					
Harrow Town Centre					
M&S, St. Anns Road	697	81%	564	£11,569	£6.53
Morrisons, Trident Point	3,282	83%	2,729	£10,209	£27.86
Lidl, St. Anns Road	1,032	89%	923	£7,989	£7.37
Other Harrow Town Centre	3,272	100%	3,272	£5,500	£18.00
Harrow Town Centre sub-total					**£59.76**

Source: ORC StorePoint, Goad, VOA, Global Data 2025 estimates (February 2026) (Please note some figures may not total precisely due to rounding)
2023 prices

Table 8: Turnover of Proposed Development, 2028

Store	Sales Floorspace (sq.m net)	Convenience Goods Floorspace (%)	Convenience Goods Floorspace (sq.m net)	Turnover (£ per sq.m)	Total Turnover (£m)
Marks & Spencer	1,685	90%	1,517	£11,569	£17.54

Source: Global Data 2025 estimates (February 2026)
2023 prices

Table 9: Convenience Goods Trade Draw of Proposed Development, 2028

	Trade Draw from each Zone						
	1	2	3	4	5	Inflow	Total
% Trade Draw	50%	28%	6%	2%	4%	10%	100%
£m Trade Draw	£8.77	£4.91	£1.05	£0.35	£0.70	£1.75	£17.54

Table 10: Commitments, 2028

Store	Sales Floorspace (sq.m net)	Convenience Goods Floorspace (%)	Convenience Goods Floorspace (sq.m net)	Turnover (£ per sq.m)	Total Turnover 2028 (£m)
Harefield Road Uxbridge - Unit A (Aldi)	1,462	80%	1,170	£11,051	£12.93
Harefield Road Uxbridge - Unit B	1,121	80%	897	£10,586	£9.50
Total	**2,583**		**2,067**		**£22.43**

Source: Application refs. 16299/APP/2023/3691 and 16299/APP/2024/32 and Global Data 2025 estimates (February 2026)
For Unit B sales density, the average turnover for Aldi, Asda, Co-op, Iceland, Lidl, M&S Food, Morrisons, Sainsbury's, Tesco and Waitrose has been used
2023 prices

Table 11: First Design Year Convenience Goods Expenditure 2028 (£m) - No Development

Centre/Facility	Zone 1 South Ruislip	Zone 2 Harrow West	Zone 3 Northolt	Zone 4 Uxbridge East	Zone 5 Uxbridge	Inflow	Total
Expenditure 2028	**131.13**	**160.94**	**63.16**	**90.17**	**54.62**		
ZONE 1							
South Ruislip Local Centre							
Sainsbury's, Long Drive	22.95	13.04	2.91	0.27	1.69	4.54	**45.39**
South Ruislip Out of Centre							
Aldi, Victoria Road	7.87	0.97	0.76	0.99	1.64	0.64	**12.87**
Lidl, Victoria Road	4.59	2.25	1.45	0.00	0.71	0.47	**9.48**
Asda, Old Dairy Lane	22.95	3.70	1.96	0.90	0.44	3.33	**33.27**
Ruislip Manor Minor Centre	4.98	0.48	0.00	0.00	0.00	0.29	**5.75**
Eastcote District Centre	6.69	5.79	0.76	0.00	0.38	0.72	**14.34**
Ruislip District Centre							
Waitrose, Kingsend	9.44	0.32	0.44	3.61	6.34	8.63	**28.78**
Other Ruislip District Centre	16.79	7.89	1.20	0.18	0.49	11.38	**37.92**
Other Zone 1	4.72	0.16	1.01	0.00	0.00	0.31	**6.20**
TOTAL ZONE 1	**100.97**	**34.60**	**10.48**	**5.95**	**11.69**		
ZONE 2							
North Harrow District Centre	0.00	1.77	0.00	0.00	0.00	0.20	**1.97**
South Harrow District Centre	1.18	12.71	4.11	0.63	0.00	2.07	**20.70**
Waitrose, Northolt Road, South Harrow (out of centre)	0.13	9.66	1.01	0.90	0.00	7.80	**19.50**
Rayners Lane District Centre	1.18	15.77	0.00	0.00	0.00	1.88	**18.84**
Pinner District Centre							
M&S Simply Food, Bishops Walk, Pinner	2.75	3.38	0.69	0.00	0.00	6.83	**13.66**
Sainsbury's, Barters Walk, Pinner	5.11	13.36	0.00	0.36	0.38	19.22	**38.43**
Other Pinner District Centre	0.13	0.16	0.00	0.00	0.00	0.29	**0.58**
Pinner Out of Centre stores	6.29	7.89	0.32	0.00	0.16	21.99	**36.65**
Other Zone 2	0.39	11.27	1.01	0.00	0.00	0.67	**13.34**
TOTAL ZONE 2	**17.18**	**75.96**	**7.14**	**1.89**	**0.55**		
ZONE 3							
Northolt District Centre	0.13	3.38	9.79	0.00	0.00	0.70	**14.00**
Lidl, Ruislip Road (out of centre)	0.00	1.13	1.83	0.00	0.00	2.96	**5.92**
Other Zone 3	0.00	0.00	4.67	0.00	0.00	0.25	**4.92**
TOTAL ZONE 3	**0.13**	**4.51**	**16.29**	**0.00**	**0.00**		
ZONE 4							
North Hillingdon Local Centre	0.39	0.97	0.32	7.39	4.70	0.72	**14.49**
Other Zone 4	0.00	0.00	2.08	7.94	0.60	0.56	**11.18**
TOTAL ZONE 4	**0.39**	**0.97**	**2.40**	**15.33**	**5.30**		
ZONE 5							
Uxbridge Town Centre							
M&S, High Street, Uxbridge	0.92	0.00	0.32	5.14	2.68	6.03	**15.08**
Other Uxbridge Town Centre	0.92	0.64	0.69	9.56	7.54	12.90	**32.25**
Uxbridge out of centre							
Sainsbury's, York Road, Uxbridge	0.00	0.64	0.06	14.52	10.92	17.43	**43.58**
Ickenham Local Centre	0.13	0.00	0.44	1.89	5.63	0.43	**8.52**
Other Zone 5	0.00	0.00	0.00	0.00	1.20	0.06	**1.26**
ZONE 5 TOTAL	**1.97**	**1.29**	**1.52**	**31.11**	**27.96**		
OUTSIDE SURVEY AREA							
Harrow Town Centre							
M&S, St. Anns Road, Harrow	0.13	1.61	0.06	0.00	0.00	5.41	**7.21**
Other Harrow Town Centre	0.92	4.83	0.06	0.90	0.00	20.13	**26.84**
Other Outside Survey Area	9.44	37.18	25.20	34.99	9.12		
OUTSIDE SURVEY AREA TOTAL	**10.49**	**43.61**	**25.33**	**35.89**	**9.12**		
TOTAL	**131.13**	**160.94**	**63.16**	**90.17**	**54.62**		

Source: Tables 3 and 4 (Please note some figures may not total precisely due to rounding)

Table 12: Second Design Year Convenience Goods Expenditure 2031 (£m) - No Development

Centre/Facility	Zone 1 South Ruislip	Zone 2 Harrow West	Zone 3 Northolt	Zone 4 Uxbridge East	Zone 5 Uxbridge	Inflow	Total
Expenditure 2031	**129.73**	**158.69**	**62.34**	**89.63**	**54.05**		
ZONE 1							
South Ruislip Local Centre							
Sainsbury's, Long Drive	22.70	12.85	2.87	0.27	1.68	4.49	**44.86**
South Ruislip Out of Centre							
Aldi, Victoria Road	7.78	0.95	0.75	0.99	1.62	0.64	**12.73**
Lidl, Victoria Road	4.54	2.22	1.43	0.00	0.70	0.47	**9.37**
Asda, Old Dairy Lane	22.70	3.65	1.93	0.90	0.43	3.29	**32.91**
Ruislip Manor Minor Centre	4.93	0.48	0.00	0.00	0.00	0.28	**5.69**
Eastcote District Centre	6.62	5.71	0.75	0.00	0.38	0.71	**14.16**
Ruislip District Centre							
Waitrose, Kingsend	9.34	0.32	0.44	3.59	6.27	8.55	**28.50**
Other Ruislip District Centre	16.61	7.78	1.18	0.18	0.49	11.24	**37.47**
Other Zone 1	4.67	0.16	1.00	0.00	0.00	0.31	**6.13**
TOTAL ZONE 1	**99.90**	**34.12**	**10.35**	**5.92**	**11.57**		
ZONE 2							
North Harrow District Centre	0.00	1.75	0.00	0.00	0.00	0.19	**1.94**
South Harrow District Centre	1.17	12.54	4.05	0.63	0.00	2.04	**20.43**
Waitrose, Northolt Road, South Harrow (out of centre)	0.13	9.52	1.00	0.90	0.00	7.70	**19.24**
Rayners Lane District Centre	1.17	15.55	0.00	0.00	0.00	1.86	**18.58**
Pinner District Centre							
M&S Simply Food, Bishops Walk, Pinner	2.72	3.33	0.69	0.00	0.00	6.74	**13.49**
Sainsbury's, Barters Walk, Pinner	5.06	13.17	0.00	0.36	0.38	18.97	**37.94**
Other Pinner District Centre	0.13	0.16	0.00	0.00	0.00	0.29	**0.58**
Pinner Out of Centre stores	6.23	7.78	0.31	0.00	0.16	21.72	**36.19**
Other Zone 2	0.39	11.11	1.00	0.00	0.00	0.66	**13.15**
TOTAL ZONE 2	**17.00**	**74.90**	**7.04**	**1.88**	**0.54**		
ZONE 3							
Northolt District Centre	0.13	3.33	9.66	0.00	0.00	0.69	**13.82**
Lidl, Ruislip Road (out of centre)	0.00	1.11	1.81	0.00	0.00	2.92	**5.84**
Other Zone 3	0.00	0.00	4.61	0.00	0.00	0.24	**4.86**
TOTAL ZONE 3	**0.13**	**4.44**	**16.08**	**0.00**	**0.00**		
ZONE 4							
North Hillingdon Local Centre	0.39	0.95	0.31	7.35	4.65	0.72	**14.37**
Other Zone 4	0.00	0.00	2.06	7.89	0.59	0.55	**11.09**
TOTAL ZONE 4	**0.39**	**0.95**	**2.37**	**15.24**	**5.24**		
ZONE 5							
Uxbridge Town Centre							
M&S, High Street, Uxbridge	0.91	0.00	0.31	5.11	2.65	5.98	**14.96**
Other Uxbridge Town Centre	0.91	0.63	0.69	9.50	7.46	12.79	**31.98**
Uxbridge out of centre							
Sainsbury's, York Road, Uxbridge	0.00	0.63	0.06	14.43	10.81	17.29	**43.23**
Ickenham Local Centre	0.13	0.00	0.44	1.88	5.57	0.42	**8.44**
Other Zone 5	0.00	0.00	0.00	0.00	1.19	0.06	**1.25**
ZONE 5 TOTAL	**1.95**	**1.27**	**1.50**	**30.92**	**27.68**		
OUTSIDE SURVEY AREA							
Harrow Town Centre							
M&S, St. Anns Road, Harrow	0.13	1.59	0.06	0.00	0.00	5.34	**7.12**
Other Harrow Town Centre	0.91	4.76	0.06	0.90	0.00	19.88	**26.51**
Other Outside Survey Area	9.34	36.66	24.88	34.78	9.03		
OUTSIDE SURVEY AREA TOTAL	**10.38**	**43.01**	**25.00**	**35.67**	**9.03**		
TOTAL	**129.73**	**158.69**	**62.34**	**89.63**	**54.05**		

Source: Tables 3 and 4 (Please note some figures may not total precisely due to rounding)

Table 13: Convenience Goods Trade Diversion and Impact 2028

Centre/Facility	Turnover 2028 (£m)	M&S South Ruislip Trade diversion 2028		Turnover 2028 with M&S South Ruislip (£m)	Impact 2028 (%)
		% scheme turnover	£m		
Sainsbury's, Long Drive, South Ruislip	45.39	22.5%	3.95	41.45	-8.7%
Aldi, Victoria Road, South Ruislip (OOC)	12.87	2.0%	0.35	12.51	-2.7%
Lidl, Victoria Road, South Ruislip (OOC)	9.48	4.0%	0.70	8.78	-7.4%
Asda, Old Dairy Lane, South Ruislip (OOC)	33.27	17.5%	3.07	30.20	-9.2%
Waitrose, Kingsend, Ruislip	28.78	7.5%	1.32	27.47	-4.6%
M&S Simply Food, Bishops Walk, Pinner	13.66	7.5%	1.32	12.34	-9.6%
Sainsbury's, Barters Walk, Pinner	38.43	5.0%	0.88	37.55	-2.3%
Waitrose, Northolt Road, South Harrow (OOC)	19.50	3.5%	0.61	18.89	-3.1%
M&S, High Street, Uxbridge [1]	14.61	5.0%	0.88	13.74	-6.0%
Other Uxbridge Town Centre [2]	32.25	0.0%	0.00	32.25	0.0%
Uxbridge Town Centre sub-total	**46.87**		**0.88**	**45.99**	**-1.9%**
M&S, St. Anns Road, Harrow	7.21	3.0%	0.53	6.69	-7.3%
Other Harrow Town Centre [3]	26.84	0.0%	0.00	26.84	0.0%
Harrow Town Centre sub-total	**34.06**		**0.53**	**33.53**	**-1.5%**
Other stores		22.5%			
TOTAL		**100.0%**	**17.54**		

Source: Tables 7, 8, 10 and 11

[1] *Adjustment made to turnover of M&S in Uxbridge to take account of estimated trade diversion from commitment at Harefield Road*
[2] *Includes Lidl, Tesco and Iceland*
[3] *Includes Morrisons and Lidl*

Table 14: Convenience Goods Trade Diversion and Impact 2031

Centre/Facility	Turnover 2031 (£m)	M&S South Ruislip Trade diversion 2031		Turnover 2031 with M&S South Ruislip (£m)	Impact 2031 (%)
		% scheme turnover	£m		
Sainsbury's, Long Drive, South Ruislip	44.86	22.5%	3.95	40.91	-8.8%
Aldi, Victoria Road, South Ruislip (OOC)	12.73	2.0%	0.35	12.38	-2.8%
Lidl, Victoria Road, South Ruislip (OOC)	9.37	4.0%	0.70	8.67	-7.5%
Asda, Old Dairy Lane, South Ruislip (OOC)	32.91	17.5%	3.07	29.83	-9.3%
Waitrose, Kingsend, Ruislip	28.50	7.5%	1.32	27.18	-4.6%
M&S Simply Food, Bishops Walk, Pinner	13.49	7.5%	1.32	12.17	-9.8%
Sainsbury's, Barters Walk, Pinner	37.94	5.0%	0.88	37.06	-2.3%
Waitrose, Northolt Road, South Harrow	19.24	3.5%	0.61	18.63	-3.2%
M&S, High Street, Uxbridge [1]	14.49	5.0%	0.88	13.62	-6.1%
Other Uxbridge Town Centre [2]	31.98	0.0%	0.00	31.98	0.0%
Uxbridge Town Centre sub-total	**46.47**		**0.88**	**45.60**	**-1.9%**
M&S, St. Anns Road, Harrow	7.12	3.0%	0.53	6.59	-7.4%
Other Harrow Town Centre [3]	26.51	0.0%	0.00	26.51	0.0%
Harrow Town Centre sub-total	**33.63**		**0.53**	**33.10**	**-1.6%**
Other stores		22.5%			
TOTAL		**100.0%**	**17.54**		

Source: Tables 8, 10 and 12

[1] *Adjustment made to turnover of M&S in Uxbridge to take account of estimated trade diversion from commitment at Harefield Road*
[2] *Includes Lidl, Tesco and Iceland*
[3] *Includes Morrisons and Lidl*

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