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Dear Sally

Unit 1, Victoria Retail Park, Crown Road, Ruislip (50209/APP/2026/371 and 50209/APP/2026/372) – response to Independent Retail Audit

We write in response to the Independent Retail Audit (IRA) prepared by MA Planning (MAP) which provides a review of the Planning and Retail Statement (PRS) submitted to accompany two planning applications at Unit 1, Victoria Retail Park. The applications will facilitate the occupation of the store by Marks & Spencer (M&S).

We deal with the issues raised by MAP under the same headings as they have used.

Sequential Test – methodology

MAP confirm that the use of a 10 and 20 minute drivetime to define the catchment of the proposed development is considered appropriate in the urban context of the site and having regard to the scale and retail floorspace proposed (para. 20). However, in their conclusions, state that a clearer justification for the proposed catchment area, by reference to the type of retail offer and operational requirements, should be provided.

As set out in the PRS, 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 is consistent with primary catchment areas that have been used in respect of other new M&S food halls in Greater London. The definition of the catchment is also based on a review of the existing convenience goods facilities and other stores in the local area, together with the proposed offer of the development and the anticipated extent of its attraction. In addition, there is a gap in the provision of existing M&S stores, with the nearest stores located at Pinner, Uxbridge and Harrow, which will be met by the proposed development. All three of these existing M&S stores are within a 20 minute drive time of the application site and will have primary catchment areas that overlap with the proposed development to some extent.

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Sequential Test – flexibility, format and scale

As set out in the PRS, the sequential test seeks to see if the application i.e. what is proposed, can be accommodated on a sequentially preferable site.

The case law summarised in the PRS confirms that while a sequentially preferable site need not be capable of accommodating exactly the same as what is proposed it must still be capable of accommodating development which is recognisably closely similar to what is proposed. In this respect, the 'Dundee' judgement states that in terms of demonstrating flexibility, the consideration is *"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".* Reducing the size of the proposed store by 20% would not be considered to be closely similar to the application scheme, and would require more than a 'reasonable' level of flexibility.

For sites to be suitable for retail use, and specifically to meet the operational requirements for the proposed M&S store, they would need to:

- Provide large, flexible floorplates with good ceiling heights;
- Be accessible at ground floor level allowing for the use of trolleys for bulk buying, and servicing needs;
- Be located in prominent locations with good visibility; and
- Provide good access to car parking to enable the store to serve customers.

In our view, assessing sites/units that could accommodate a store of around 10% less than the proposed development demonstrates flexibility in undertaking the sequential assessment, and this is generally accepted as a standard approach to take. In any event, the lower site size (1.2 ha) considered is 15% smaller than the site requirement of 1.4ha, which demonstrates further flexibility.

Despite the set parameters, the sequential site assessment set out in Appendix 1 did consider smaller sites and units – see site U1 for example – and no additional sequential sites were identified and discounted specifically on the basis that they fell below the assessment thresholds.

Sequential Test – car parks and marketed sites

MAP did not identify any specific car parks or sites that they consider could be consolidated or assembled to free up development sites, and no such opportunities were identified in undertaking our assessment. In addition to the noted high occupancy of the car parks, these were all considered to be important facilities for the centres, and perform a valuable in terms of catering for both local residents, businesses and visitors. The Council generally seeks to retain such facilities in the interests of preserving their use for residents and visitors to an area, and we note that none of the car parks is allocated for redevelopment within the Council's Local Plan Site Allocations and Designations. All of these car parks have therefore been assessed as unavailable for development.

MAP has not suggested any alternative sites or units that they are aware of that we should review. We have undertaken a review of a number of property agents' websites, including Rightmove, Zoopla, Completely Retail, Savills and local agents, and have not identified marketing details for any units or sites for retail use within the 20 minute drive time either for sale or to rent that are even half of the size of the proposed M&S store. Therefore, no car parks within the proposed catchment area (and beyond) are deemed to meet the sequential test requirements.

Sequential Test – assessment

MAP has asked for additional information to be provided in respect of site NH1, Land South East of Hillingdon Station.

As set out in the PRS, this site is allocated for residential development in the Hillingdon Local Plan, and 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**.

Full planning permission was granted in March 2021 (ref. 4266/APP/2019/3088) for a residential-led, mixed-use development including 514 units (Use Class C3) and flexible commercial units (Use Class B1/A1/A3/D1). The commercial accommodation would include approximately 1,200 sq.m of B1/A1/A3/D1 uses in total, which equates to only around 20% of the proposed M&S store. Condition 44 attached to this condition stated that no ground floor commercial/flexible unit shall exceed 300 sq.m in size. The reason given for this condition is to ensure that the proposal meets the needs of the community and to minimise parking stress in the local area.

There have been a number of previous applications on the site that included a greater quantum of retail floorspace, most of which were refused planning permission. In 2014, the Council resolved to grant a full application (ref. 4266/APP/2014/518) for retail-led, mixed-use redevelopment of the site, comprising a 3,543 sq.m (GIA) food store, three additional retails units totalling 1,037 sq.m. (Use Classes A1 to A5) plus a hotel, alongside an outline application for residential units. However, the S.106 agreement was never completed in connection with these applications and so planning permission was never granted. The officer's report for the full application proposed the following condition restricting the floorspace of the food store:

"… no more than 27% of the retail floorspace contained within the main retail flood store unit hereby approved shall be used for the display or sale of comparison goods. Furthermore, the total gross internal floorspace of the retail food store shall not exceed 3,543 sq.m …"

The officer's report noted that there is no land use policy objection to the principle of a retail led mixed use development of the site, *"provided the retail element is of a scale that is appropriate to the continued viability of the local centre; offers convenience or specialist goods and services that are accessible people who would otherwise need to travel further afield and gives due regard to the cumulative impact of planned or emerging development within Hillingdon Circus, especially a potential food store development on land adjoining Hillingdon Station"*.

The fact that the S.106 was not completed and a subsequent application for this quantum of retail floorspace on the site suggests that the site is potentially not a viable option for retail floorspace of this scale. In addition, and most importantly, the Local Plan allocation for the site post dates this permission, and did not seek to allocate the site for a significant amount of retail floorspace. The allocation sites:

"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****."*

It is clear that the proposed M&S store does not comprise the type of small scale retail that is envisaged by this policy, nor would it be in keeping with the small scale retail offer of the local centre. Therefore, the proposed development would be contrary to the Local Plan allocation for the site. The site 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.

In addition, we are aware that a Screening Opinion has recently been submitted for this site, with development proposals comprising approximately 800 residential units and 700 sq.m of commercial (Class E) floorspace. An application for this scheme is expected to be submitted in the Autumn.

We retain our view that this site is not suitable or available for the proposed development; therefore, it is not sequentially preferable. In addition, as set out in the PRS, 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.

Sequential Test – conclusion

MAP agrees with our approach to the sequential test, but asked for the additional information set out above, in order to demonstrate compliance with the NPPF and Policy DTMC1. We trust that the additional information provides sufficient comfort for MAP that there are no sequentially preferable sites in any centres that are suitable or available to accommodate the proposed development.

Impact Assessment - methodology

MAP is happy that the impact assessment considers the impact of the introduction of food sales only.

As requested, please see attached to this letter the full NEMS survey report. This provides the full results, including NEMS' methodology and the questionnaire used. In summary, the details of the survey are as follows:

- Survey date – July – August 2025;
- Sample size – 853 across five zones;
- Interviews conducted over the phone, including mobile numbers;
- Questionnaire follows the same approach that Lichfields has used for numerous studies across the Country.

MAP confirmed that they are happy with the catchment area adopted for the retail impact assessment, and population and expenditure data applied, and with the design year and turnover adopted for the proposed development.

Impact Assessment – town centre health checks

MAP confirms that the conclusions of the health check assessments are appropriate and a sound basis for understanding the role and function of the centres, however asked for additional information in relation to the methodology for undertaking the assessments.

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In line with the NPPG, Lichfields has adopted a proforma to complete on site and survey the centres, which sets out the key indicators. A copy of the proforma is attached to this letter, for information.

Impact Assessment – trade draw and diversion

MAP queried the trade draw of the proposed development, as set out in Table 9 of Appendix 3, and suggested that this does not reflect the trade draw of the existing Sainsbury's store at South Ruislip. However, we are unclear where the figures that MAP set out in their table at para. 46 have been derived from.

The table below provides a comparison of the trade draw for the Sainsbury's, using the NEMS survey derived spending patterns for 2023 (Table 5, Appendix 3), and the estimated trade draw of the proposed development (Table 9, Appendix 3).

	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Inflow	Total
Sainsbury's turnover, 2023 £m (Table 5, Appendix 3)	23.77	13.67	3.07	0.28	1.76	4.73	47.27
Trade draw of Sainsbury's	50%	29%	6%	1%	4%	10%	100%
Trade draw of proposed development (Table 9)	50%	28%	6%	2%	4%	10%	100%

The trade draw patterns for the proposed development are therefore comparable to the trade draw for the existing Sainsbury's, which is taken directly from the NEMS results/market shares. A very slight adjustment has been made to slightly increase the trade draw from Zone 4, and reduce slightly the trade draw from Zone 2.

MAP query why there is a relatively low trade draw from Zone 3. As can be seen in the table above, this is exactly the same figure for trade draw as the Sainsbury's store currently draws from Zone 3. In simple terms, trade draw is where people are coming from to use the new development – ie. what zone do they live in. Although Zone 3 is close to the application site, the population of Zone 3 is much lower than for Zones 1 and 2. As can be seen from the market shares (Table 4), 25.8% of spending is retained in Zone 3 and 40.1% of spending from Zone 3 is spent in competing centres beyond the study area, including Greenford and Southall.

It is assumed that 10% of the store's turnover will be 'inflow', ie. derived from people living beyond the study area. This includes for example people living beyond the study area but within the 20 minute drivetime, pass by trips and people who work in the area but live outside. This is considered to be a reasonable assumption. It is also important to note that the impact assessment is undertaken on the basis of the entire turnover of the store, not just the turnover derived from the study area, which is a robust approach.

As set out in the PRS, in terms of estimating trade diversion, ie. how much trade being diverted from each store/centre to the new development, it is necessary to use some judgement to estimate where the turnover of the store will be diverted from. This cannot be assessed purely on the basis of the household survey results/trade draw. There are a number of factors that are taken into account in making the assumptions. Generally, facilities will compete on a like for like basis, and we expect trade to primarily be drawn from the existing supermarkets. The NPPG confirms that "retail uses tend to compete with their most comparable competitive facilities."

The forecast patterns of trade diversion have been undertaken on this basis, with the majority of the trade diversion estimated to 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.

We trust the above provides MAP with sufficient clarity on the approach taken to trade draw and trade diversion. The PRS provides a very robust approach to assessing retail impact arising from the proposed development.

Impact Assessment – impact on vitality and viability

MAP make the point that the proposed development involves the loss of 1,680 sq.m of comparison goods net sales area, which is likely to have a notable positive effect in terms of comparison expenditure being available to existing stores in the catchment area. While it is difficult to quantify the positive benefits that this would have on specific alternative facilities, it will release additional spending to the local area. The unit is currently occupied by The Range on a short term lease arrangement. The Range has an average sales density of £1,664 per sq.m in 2028 (source: Global Data, 2026; adjusted to 2023 prices and forecast to 2028). This gives a potential turnover of around £2.8 million of comparison goods expenditure, and a proportion of this will be released and spent in the local area, including within nearby local centres, which can be seen as a positive impact.

Conclusions

We are pleased that MAP concludes that overall the PRS provides an appropriate assessment of the proposed development, and the approach taken is generally robust.

MAP state that the broad interpretation of the sequential test is agreed. We trust that the additional information provided above in this respect demonstrates that the proposed development fully complies with the sequential test.

MAP also confirm that the retail impact assessment methodology is also broadly appropriate. Additional clarification is provided above, that demonstrate that the trade draw and trade diversion assumptions are justified and robust.

We would be grateful for this response to be sent to MAP, and if it would be useful, we would be happy to engage directly with MAP if any further points of clarification are required.

Yours sincerely

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