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Independent Retail Audit

Ref Nos: 50209/APP/2026/371 & 50209/APP/2026/372

Date of review: June 2026

Application Site: Unit 1, Victoria Retail Park, Crown Road, Ruislip

Proposal: “*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.*”

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This report is provided as independent professional advice. It remains a matter for the Council, as local planning authority and decision-maker, to determine the weight to be given to the relevant retail considerations and the overall planning balance. The report was undertaken MA Retail Planning, an organisation bound by the RTPI Code of Professional Conduct.

Introduction

1. This statement has been prepared by MA Retail Planning on behalf of Hillingdon Borough Council to provide an independent retail audit of the Planning and Retail Statement ('PRS') submitted in support of 2no. full planning applications at Unit 1, Victoria Retail Park, Crown Road, Ruislip. The applications seek the continued use of an existing retail unit (Class E(a)), including food sales and associated works and the reconfiguration of existing mezzanine and installation of additional mezzanine floorspace.

2. The purpose of this review is to advise the Council on whether the submitted retail evidence is sufficiently robust in relation to the principal retail and town centre policy tests arising from the National Planning Policy Framework, the Planning Practice Guidance and the adopted London Plan and Hillingdon Local Plan. The review focuses on the sequential test and retail impact test.

3. This report does not purport to assess transport, design, drainage, biodiversity net gain, ecology, landscape, archaeology, employment land or any other non-retail planning matters, except where they overlap with retail and town centre policy considerations.

4. The documents reviewed include the applicant's PRS dated February 2026, the submitted retail impact spreadsheet, and the supporting planning information made available to the Council at the time of this review.

The Site and Context

Application Site

5. The application site comprises Unit 1 at Victoria Retail Park, Crown Road, Ruislip. The unit is a large format two-storey Class E(a) retail unit, currently occupied by The Range, with retail floorspace at ground floor and mezzanine level. The site is located approximately 400m east of South Ruislip Local Centre and is correctly identified within the PRS as an out-of-centre location for the purposes of retail planning policy.

6. The retail park is accessed via Crown Road from Victoria Road and benefits from a shared surface car park to the north of the retail units. The PRS identifies that the Victoria Retail Park car park comprises 336 spaces. Adjacent occupiers include Currys and Tapi Carpets & Floors, with commercial and industrial uses located to the south and east.

7. The site is located within an established retail park environment on Victoria Road. The wider area includes a number of existing out-of-centre retail facilities, including foodstore operators in and around South Ruislip. South Ruislip Local Centre is the nearest designated centre and contains South Ruislip Station and a Sainsbury's supermarket which forms an important anchor for the centre.

Proposed Development

8. The proposal comprises two linked full planning applications. The first seeks permission for the continued use of Unit 1 as a retail unit within Class E(a), including food sales, with external alterations to the unit, demolition of the existing garden centre, provision of plant area, installation of trolley bays, cycle parking and other associated works.

9. The second application seeks permission for the reconfiguration of the existing mezzanine and installation of additional mezzanine floorspace. Together, the applications are intended to facilitate the occupation of Unit 1 by M&S as a full line store including clothing, home, health and beauty, wellness and food.

10. The existing lawful use of the unit is retail. However, condition (v) attached to the relevant appeal decision restricts the unit to the sale of non-food comparison goods. The key retail planning issue therefore relates to the proposed introduction of food sales, together with the overall configuration of the store for sequential test purposes.

11. The floorspace breakdown set out in the PRS is summarised below.

Floorspace	Existing (sqm)	Proposed (sqm)	Change (sqm)
Total GIA	4,900	5,731	+831
Total net sales area	4,125	4,130	+5
Convenience goods net sales area	0	1,685	+1,685
Comparison goods net sales area	4,125	2,445	-1,680

12. The proposed increase in total net sales area is therefore very limited. However, the proposal would introduce 1,685 sqm net of convenience goods floorspace, whilst reducing the comparison goods net sales area by 1,680 sqm. This point is important when considering the scope of the retail impact assessment and the overall baseline position.

Policy Context

13. The NPPF identifies retail uses as main town centre uses. Given that the application site is outside a defined centre and is not in accordance with an up-to-date plan allocation for the proposed town centre use, the proposal is subject to the sequential test set out at paragraphs 91 and 92 of the NPPF.

14. Paragraph 91 of the NPPF states that 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. Paragraph 92 requires applicants and local planning authorities to demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge-of-centre sites are fully explored.

15. In respect of impact, paragraph 94 of the NPPF requires an impact assessment for retail and leisure development outside town centres which is not in accordance with an up-to-date plan and exceeds a proportionate locally set threshold. The assessment should include the impact on existing, committed and planned public and private investment in centres within

the catchment area, and the impact on town centre vitality and viability, including local consumer choice and trade in the town centre and wider retail catchment.

16. Paragraph 95 of the NPPF confirms that where an application fails to satisfy the sequential test or is likely to have a significant adverse impact on one or more of the matters set out in paragraph 94, it should be refused.

17. At the local level, London Plan Policy SD7 requires boroughs to take a town-centres-first approach and applies the sequential and impact tests to main town centre uses. Hillingdon Local Plan Policy DMTC1 similarly requires main town centre uses in out-of-centre locations to demonstrate that there are no available or suitable sites in a town centre or edge-of-centre location. It also sets a local retail impact threshold of 200 sqm gross retail floorspace.

18. The PRS correctly identifies that the proposal is subject to both the sequential test and retail impact assessment. The policy context presented by the applicant is broadly robust and aligns with the relevant national and local retail planning provisions.

Sequential Test

Methodology

19. The PRS identifies that the proposed development will serve a primary catchment equating to approximately a 10-minute drive time from the site, with 10- and 20-minute off-peak drivetimes. The centres within the 10-minute drivetime comprise South Ruislip, Ruislip, Ruislip Manor, Eastcote, North Hillingdon, North Harrow, South Harrow, Rayners Lane and Northolt. The PRS also assessed Harrow and Uxbridge town centres, notwithstanding that they sit outside the 10-minute drivetime, which is considered a robust approach.

20. Still, the catchment area could have been better justified by reference to the type of retail offer proposed, including, but not limited to, the operational needs of this type of retail offer, the intended role of the food hall, the likely frequency of visits and how the store would sit within the wider retail hierarchy. Notwithstanding this, a 10- to 20-minute drivetime is considered appropriate in the urban context of the site and having regard to the scale and retail floorspace proposed.

21. The applicant's interpretation of the sequential test is agreed in broad terms. It is appropriate to consider the availability and suitability of sequentially preferable sites by reference to the broad type of development proposed, rather than requiring disaggregation of the scheme. The applicant's reliance on the principles established through relevant case law and appeal decisions is therefore considered appropriate.

Flexibility, format and scale

22. The PRS applies a flexibility margin of 10% from the proposed floorspace of 5,731 sqm GIA. It also identifies that, to accommodate a store of this scale plus servicing and some car parking, a site would need to be 1.4ha or more, although smaller sites of 1.2ha and above have also been considered.

23. A 10% flexibility margin is at the low end of flexibility ranges that are normally applied in sequential assessments of this type. In our experience, a flexibility margin closer to 15% to 20% is more appropriate. The applicant should therefore consider providing further justification for why 10% represents a proportionate and reasonable flexibility allowance or, alternatively, increase the flexibility margin.

24. The 1.4ha site area requirement, and the lower 1.2ha assessment threshold, are helpful indicators. However, the relationship between floorspace, servicing, car parking, access and operational requirements could be explained in greater detail. This is particularly important where a site is discounted because it falls slightly below the applicant's stated site area requirement.

Car parks and marketed sites

25. The PRS explains that car parks were reviewed during the site visit, but that they were all at least circa 50% full and perform a valuable role. On this basis, they were not considered suitable for redevelopment. Further assessment should be provided in respect of car parks. In particular, there may be scope in some centres for car parks located adjacent to each other, or adjacent to other land, to be rationalised, consolidated or partially redeveloped in a way which could free up a larger site while retaining an appropriate level of parking. In addition, the current assessment appears to rely heavily on observed utilisation at the time of visit and also does not recognise that parking capacity levels differ from day to day and are influenced by the time of the day.

26. More importantly though, the methodology refers to development plan allocations, existing permissions and proposals, and an on-the-ground site survey. However, marketed sites should have been considered. The applicant should confirm whether commercial property searches, agents' particulars and marketed development opportunities were reviewed. If not, the applicant should seriously consider including marketed properties in the sequential test assessment.

Sequential test assessment

27. PRS's Appendix 1 assesses a number of centres and identified sites. The majority of centres within the search area are small centres where no obvious in-centre or edge-of-centre sites were identified. This is unsurprising given the scale and format of the proposed M&S store.

28. In respect of Land South East of Hillingdon Station (NH1), the site is identified as approximately 3.3ha and is subject to a mixed-use allocation and a 2021 planning permission for residential-led mixed-use development. The applicant concludes that the site is not suitable or available because it is intended to come forward for residential-led mixed-use development and makes an important contribution to housing land supply. Whilst this is a relevant consideration, it has not been considered in sufficient detail why a mixed-use residential-led development could not include the proposed development as part of a comprehensive mixed-use scheme, for example through a housing density exercise, an understanding of site constraints affecting the developable area. Further analysis may therefore be required before the site can be discounted with confidence.

Sequential test conclusion

29. Overall, the broad approach to the sequential test is agreed and the applicant has assessed a proportionate range of centres, including Harrow and Uxbridge for robustness. The interpretation of the test is also considered appropriate.

30. However, before the Council can rely on the sequential assessment with full confidence, it should consider requesting further information from the applicant in relation to the justification for the 10% flexibility margin, the treatment of car parks and potential land assembly opportunities, the review of marketed sites, and the assessment of site ref. NH1. Subject to these matters being addressed, the sequential assessment may be capable of demonstrating compliance with the NPPF and Policy DMTC1.

Impact Assessment

Methodology

31. The PRS focuses the retail impact assessment on the proposed introduction of food sales floorspace only. Given the existing use comprising comparison retail floorspace, this approach is considered appropriate. The existing unit is restricted to non-food comparison goods, and the proposal would introduce a 1,685 sqm net food hall. The non-food floorspace is not restricted in the same way and, in any event, the proposed comparison goods net sales area would reduce by 1,680 sqm compared with the existing position.

32. The applicant has commissioned a household survey from NEMS Market Research and has used Experian population and expenditure data, including Experian's Retail Planner Briefing Note 22.

33. Given the age of the Council's evidence base, the commissioning of a new household survey is considered a very robust element of the assessment. However, the methodology underpinning the NEMS survey is not set out in any meaningful detail within the PRS or Appendix 3. It would be helpful for the applicant to provide the full NEMS survey report, or a short methodological note, confirming the survey dates, sample size, interview method, questionnaire structure, weighting approach and treatment of non-responses.

34. The 'Retail Trends' section demonstrates a very good understanding of current retail trends and is useful in understanding the retail context of the proposed development, including the limited expenditure growth environment, the role of special forms of trading and changing customer behaviour.

35. The expected catchment area adopted for impact purposes is considered appropriate in this context, including an allowance for inflow expenditure. Zones 1, 2 and 3 are stated to comprise the primary catchment, with some trade expected to be drawn from beyond that area which broadly reflects the 10-minute drive time core catchment area.

Town centre health checks

36. It is robust that the applicant has undertaken new health check assessments rather than relying on potentially outdated health checks which reviewed the centres within or just beyond the 10-minute drivetime.

37. However, there is no clear description of the methodology used to undertake the health check assessments. The applicant should confirm whether the assessments have been undertaken having regard to the indicators identified in the PPG, including diversity of uses, proportion of vacant street-level property, retailer representation, pedestrian flows, accessibility, perception of safety and occurrence of crime, state of town centre environmental quality and customer views and behaviour where available.

38. The inclusion of centre-specific observations on retailer representation, diversity of uses, vacancy rates, accessibility, pedestrian movement, environmental quality and supermarkets is helpful. However, a short methodology section should be added to Appendix 2 or Section 6 of the PRS so that the Council can understand how the health check conclusions have been reached and how consistent the analysis is across centres having regard to the PPG guidance.

39. Notwithstanding the absence of a clearly defined health check methodology, it is considered that the conclusions reached within the health check assessments are generally robust and provide a useful indication of the current local retail context, vitality and viability of the centres within the catchment area. The assessments include a broad range of relevant indicators, including retailer representation, vacancy levels, environmental quality, accessibility and pedestrian activity, which collectively provide a reasonable understanding of the performance of each centre.

40. As such, whilst additional methodological clarity would improve transparency and allow the consistency of the assessments to be more readily verified, the overall findings are considered credible and represent a sound basis for understanding the role and function of the identified centres.

Design year and turnover

41. The applicant adopts a design year of 2028, assuming permission is granted in Spring 2026, with an additional assessment at 2031. This is considered appropriate and reflects the point by which the proposal would be expected to be trading and its effects would be evident and in line with PPG guidance which states that the design year is conventionally taken as the second full calendar year of trading after the opening of the proposed retail development.

42. The calculation of the proposed development's convenience goods turnover is generally sound. The assessment assumes a food hall net sales area of 1,685 sqm, of which 90% is convenience goods floorspace, equating to 1,517 sqm net. Applying a sales density of £11,569 per sqm results in an estimated convenience goods turnover of £17.54m in 2028.

Trade draw and diversion

43. The key area of concern relates to the trade draw and trade diversion assumptions. The PRS explains that the trade draw of the proposed development is primarily based on the existing trade draw of nearby facilities, particularly Sainsbury’s at South Ruislip, as estimated from the household survey results. However, Appendix 3 then applies assumed zonal trade draw figures of 50%, 28%, 6%, 2%, 4% and 10% inflow.

44. We do not agree with this approach as presently justified. The applicant has very up-to-date NEMS market share figures across the study area and has itself indicated that the Sainsbury’s market shares can be used as a like-for-like proxy, in line with PPG guidance. These market shares should therefore be used, or at least used as the starting point, rather than relying on assumed trade draw figures which, unless individually and robustly justified, can appear artificially adjusted.

45. In particular, if the core catchment area comprises Zones 1, 2 and 3, it is unclear why Zone 3 contributes only 6% of the proposed store’s turnover while inflow from outside the wider area is assumed to be 10%. Unless robustly justified, it would be expected that the 50% trade draw from Zone 1 would be more evenly spread across the three zones in the 10-minute core catchment area.

46. Informed by the market shares of Sainsbury’s across the five zones and allowing for 10% inflow, the trade draw would look more like the following.

Source	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Inflow
Applicant Table 9	50.0%	28.0%	6.0%	2.0%	4.0%	10.0%
Sainsbury’s-derived indication	46.9%	21.7%	12.3%	0.8%	8.3%	10.0%

47. It is not to say that the Sainsbury’s-derived profile must be applied mechanistically without judgement. However, if the applicant wishes to depart from the NEMS-derived market share pattern, clear reasons should be provided. Such reasons may include differences in store format, brand, customer mission, car-borne accessibility and the expected role of the proposed M&S food hall. These reasons are not currently set out in sufficient detail.

48. The same concern applies to the impact assessment sheets within Appendix 3. The assessment assumes store-specific trade diversion rates, including 22.5% from Sainsbury's South Ruislip, 17.5% from Asda Old Dairy Lane, 7.5% from Waitrose Ruislip, 7.5% from M&S Simply Food Pinner, 5% from Sainsbury's Pinner, 5% from M&S Uxbridge and 3% from M&S Harrow.

49. Unless these assumptions are supported by robust, evidence-based justification, the use of hand-picked trade draw or trade diversion percentages can artificially influence the impact assessment and has the potential to underestimate impacts, particularly on smaller stores and centres. Smaller stores often perform an important anchor function within defined centres, generating linked trips and supporting the wider vitality and viability. Consequently, any assessment of retail impact should be undertaken on a robust and proportionate basis and, where there is uncertainty, should reflect a reasonable worst-case scenario.

50. In this regard, it is considered that the latest available NEMS household survey market shares provide a more robust and up-to-date evidence base than individually selected trade draw assumptions. The PPG guidance (Paragraph: 017, Reference ID: 2b-017-20190722) advises that, where possible, impact assessments should be informed by like-for-like assessments, using existing retailers that operate in a similar manner to the proposed development. The applicant has already acknowledged elsewhere within the PRS that Sainsbury's provides an appropriate like-for-like comparator for the proposed M&S Foodhall.

51. Given this position, it would be more appropriate to utilise the latest observed NEMS market shares for Sainsbury's, rather than replacing them with assumed trade draw percentages. These market shares are derived from recent household survey evidence and therefore remove unnecessary subjectivity from the assessment, provide greater confidence in the predicted trade diversion effects, and ensure that the retail impact assessment represents a more robust and transparent assessment of the proposal's effects on existing centres.

Impact on vitality and viability

52. Based on the applicant’s current assumptions, the highest convenience goods impact identified is on Sainsbury’s South Ruislip at -8.7%, with impacts also identified on out-of-centre stores and selected in-centre foodstores. The applicant concludes that the relevant stores are trading well and that the resulting impacts would not be significantly adverse.

53. That conclusion may ultimately be capable of being supported, particularly given that South Ruislip appears to be a healthy and viable centre with a low vacancy rate and a strong anchor supermarket. However, the conclusion cannot be fully relied upon until the trade draw and trade diversion assumptions have been revisited and justified by reference to the NEMS survey evidence.

54. The assessment of planned investment is acceptable in broad terms. The applicant identifies the Harefield Road Uxbridge commitment and adjusts the Uxbridge M&S turnover to take account of estimated trade diversion from that commitment. No other planned or committed in-centre retail investment is identified that would appear to be prejudiced by the proposal.

55. The assessment could also recognise more explicitly that the proposal involves the loss of 1,680 sqm of comparison goods net sales area when compared against the existing lawful/baseline position. This is likely to have a notable positive effect in terms of comparison expenditure being available to existing stores in the catchment area. The retail impact conclusion should therefore consider, at least qualitatively, the overall proposal’s change in turnover compared with the baseline/existing position, rather than only presenting the food/convenience impact in isolation.

Positive impact and clawback

56. The overall structure of the retail impact assessment is good. The baseline data, use of NEMS survey evidence, Experian data, health checks, design year and calculation of the proposed convenience turnover are all generally robust and proportionate to the scale of the proposal.

57. However, without the trade draw and trade diversion matters identified above being addressed, it cannot be fully assessed with confidence whether the proposal would have an acceptable impact on town centres. The Council should consider requesting that the applicant revises the trade draw and impact modelling in Appendix 3, or provides a clear and evidenced justification for each departure from the NEMS-derived market share data.

Conclusion and Recommendations

58. The submitted Planning and Retail Statement is generally well-structured and recognises the need to apply both the sequential test and retail impact assessment. In a number of respects the approach is robust, including the inclusion of Harrow and Uxbridge in the sequential assessment, the commissioning of a new NEMS household survey, the undertaking of new health checks and the use of up-to-date expenditure data.

59. The broad interpretation of the sequential test is agreed. However, further information should be sought in respect of the catchment justification, flexibility margin, car park and land assembly opportunities, marketed sites, and the assessment of Land South East of Hillingdon Station (NH1).

60. The retail impact assessment methodology is also broadly appropriate, particularly insofar as it focuses on the proposed food sales and uses 2028 and 2031 as design and maturity years. The calculation of the proposed convenience turnover is considered reasonable. Nevertheless, the trade draw and trade diversion assumptions are not sufficiently justified and should be revisited using the NEMS market shares as the starting point.

61. The Council should therefore consider seeking the following additional information before reaching a final conclusion on retail policy compliance:

- a clearer justification for the proposed catchment area, by reference to the type of retail offer and operational requirements;
- a revised sequential assessment applying a more generous flexibility margin, or a clear justification for retaining the 10% margin;
- additional analysis of car parks, potential land assembly opportunities and, most importantly, an analysis of marketed sites;
- further analysis of site no. NH1;
- a short methodology statement for the NEMS market research and the town centre health checks;
- a revised Appendix 3 impact assessment using NEMS-derived market shares and a justified worst-case trade diversion scenario; and
- consideration of comparison goods floorspace reduction and the positive impact this may have on existing stores in the catchment area.

62. Subject to the above matters being addressed, it may be possible for the Council to reach a positive conclusion on the retail planning matters. At this stage, however, the sequential test and retail impact conclusions should not be accepted without the additional clarification and revised analysis identified in this review.

63. Nevertheless, if the Council is minded to grant permission, any approval should be subject to suitably worded retail conditions to ensure that the unit trades in accordance with the assumptions tested in the PRS and this review.

64. In particular, conditions should restrict the maximum convenience goods net sales floorspace to that assessed, prevent food sales from the mezzanine level, and secure the overall floorspace parameters upon which the retail impact assessment is based. Without such controls, the proposal could trade in a materially different manner to that assessed, which would reduce the reliability of the sequential and impact conclusions.