

Independent Retail Audit – Response and Overall Conclusion

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

Date of review: July 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.”*

1. Further to the Independent Retail Audit prepared in June 2026, I have reviewed the applicant's response dated 6 July 2026, together with the additional NEMS household survey information and town centre health-check methodology.
2. The additional information responds directly to the matters raised in the Independent Retail Audit. Taken together with the original Planning and Retail Statement ("PRS"), I am satisfied that it provides a sufficiently robust and proportionate basis upon which the Council can determine the retail planning matters arising from the applications.

Sequential Test

3. The applicant has provided further justification for the geographical scope of the sequential assessment, having regard to the nature, scale and anticipated attraction of the proposed M&S store, the distribution of existing M&S stores and the extent of their respective catchments. This satisfactorily explains the use of the 10-minute primary catchment and the wider 20-minute search area.
4. The applicant's response also provides additional justification for the flexibility applied to format and scale. Although the 10% floorspace allowance remains towards the lower end of the range commonly applied, this should be considered alongside the assessment of sites as small as 1.2 hectares, representing a reduction of approximately 15% against the stated 1.4-ha site requirement. Smaller sites and units were also considered where identified, and the applicant confirms that no potential site was discounted solely because it fell marginally below the identified thresholds. On balance, I consider that a reasonable degree of flexibility has been demonstrated in line with paragraph 92 of the NPPF.
5. The applicant has confirmed that searches of national and local commercial property sources were undertaken and that no marketed site or unit within the 20-minute drivetime was identified that was even half the size of the proposed store. The further explanation concerning the function, utilisation and development-plan status of existing public car parks also provides sufficient justification for discounting these as unavailable, with no specific realistic land-assembly opportunity having been identified.
6. In relation to Land South East of Hillingdon Station (site NH1), the additional information confirms that the site is intended to deliver predominantly residential development, with only small-scale commercial uses envisaged by its allocation. The existing permission provides approximately 1,200 sqm of commercial floorspace, with individual units restricted to no more than 300 sqm, while the emerging redevelopment proposals comprise approximately 800 homes and 700 sqm of Class E floorspace. This evidence provides a satisfactory basis for concluding that the site is neither suitable nor available to accommodate the broad type and scale of development proposed.
7. I therefore agree with the applicant's conclusion that no suitable and available sequentially preferable site has been identified. The sequential test is satisfied.

Impact Assessment

8. The full NEMS survey material provides the requested information concerning the survey period, sample size, geographical coverage, interview method and questionnaire. The additional health-check pro forma also demonstrates that the assessments were undertaken consistently and with regard to the relevant indicators identified in the Planning Practice Guidance. These documents satisfactorily address the methodological matters raised in the Independent Retail Audit.
9. The applicant has also provided a clearer reconciliation of the proposed store's trade draw with that of the existing Sainsbury's at South Ruislip. The NEMS-derived trade draw for Sainsbury's is 50%, 29%, 6%, 1%, 4% and 10% inflow, compared with 50%, 28%, 6%, 2%, 4% and 10% for the proposed development. These profiles are closely aligned and satisfactorily address the concern that the proposed trade draw had departed materially from the available household survey evidence.
10. The further explanation of the trade-diversion assumptions is also accepted. The approach appropriately recognises that trade diversion cannot be derived mechanistically from household survey results and requires professional judgement having regard to proximity, store format, brand and the principle that retail facilities generally compete most directly with comparable facilities.
11. The applicant has also quantified the potential positive effect associated with the reduction of 1,680 sqm of comparison goods net sales floorspace. The existing comparison goods floorspace is estimated to generate approximately £2.8 million of turnover, a proportion of which would be available to other facilities, including stores within nearby designated centres.
12. Having considered the original PRS and the additional clarification, I agree that the proposed development would not result in a significant adverse impact upon existing, committed or planned investment, or upon the vitality and viability of South Ruislip or any other relevant centre within the catchment area.

Overall Conclusion

13. The additional information satisfactorily addresses the matters identified in the Independent Retail Audit. I concur with the conclusions of the PRS in relation to both the sequential test and retail impact assessment. As recommended previously, the Council should consider appropriately worded conditions securing the floorspace parameters assessed within the retail evidence.
14. The Council can therefore rely upon the PRS, as supplemented by the applicant's response and supporting information, in determining the applications. I raise no objection in relation to retail and town centre planning matters and consider that the proposals comply with paragraphs 91-95 of the NPPF, London Plan Policy SD7 and Policy DMTC1 of the Hillingdon Local Plan. The applications should therefore be considered favourably insofar as retail planning matters are concerned.