



West Southall Masterplan

Retail Assessment October 2008

On behalf of:
National Grid Property Limited

**PROPOSED MIXED USE DEVELOPMENT AT THE FORMER SOUTHALL GAS
WORKS SITE, SOUTHALL
(TO BE KNOWN AS 'WEST SOUTHALL')**

RETAIL ASSESSMENT

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FOREWORD

Planning Submission

This Report is one of a series of documents that have been prepared on behalf of National Grid Property Limited (NGPL), to support an outline planning application with details of all proposed accesses submitted in full for the comprehensive redevelopment of 44.7 hectares of land known as the Southall Gas Works site ('the Application Site'). This Report should be read in conjunction with the drawings and other documents submitted as part of this application, as follows:

- Environmental Statement, including a Non-Technical Summary
- Design and Access Statement (including Landscape and Accessibility Strategy)
- Development Specification
- Planning Statement
- Transport Assessment
- Framework Travel Plan
- Sustainability Strategy
- Energy Strategy including Renewables
- Regeneration Strategy
- Housing Strategy
- Health Impact Assessment
- Remediation Strategy
- PADHI Report
- General Management Strategy
- Statement of Community Involvement

Local Planning Authority

The application is submitted to both the London Borough of Ealing (LBE) and the London Borough of Hillingdon (LBH) as the Application Site straddles the borough boundaries.

Application Proposals

The proposals are for a high quality residential-led mixed use development comprising the following:

An outline application for the demolition of the following properties: 16-32 (even) The Crescent; 1-11 (odd) Randolph Road; 137-143 (odd), 249 and 283 Beaconsfield Road; 30 The Grange; the remediation of the land and the redevelopment of the site to deliver a mixed use development for up to: 320,000sqm of residential, up to 14,200sqm for non-food retail, up to 5,850sqm of food retail, up to 1,750sqm of Class A3-A5 uses, up to 9,650sqm of hotel, up to 3,000 sqm of conference and banqueting, up to 4,700sqm of leisure forming a cinema, up to 2,550sqm of health care facilities, up to 3,450sqm of education facilities, up to 3,500sqm of office/studio units, up to 390sqm of sports pavilion, up to 600sqm of energy centre, up to 24,450sqm of multi-storey car park and associated car and cycle parking, landscaping, public realm, open space and children's playspace; and

Details are submitted for full approval (layout, scale, appearance and landscaping) of the following accesses:

- Pump Lane Link Road – New access road from the Hayes bypass to the Application Site for vehicle, cycle and pedestrian access, including drainage and a flood relief pond.
- Eastern Access – New access road from Southall centre to the site, including land currently occupied by properties on The Crescent.
- Minet Country Park Footbridge – Central pedestrian and cycle access to the Minet Country Park, bridging over the Canal and Yeading Brook.
- Springfield Road Footbridge – Northern pedestrian and cycle access to Minet County Park and Springfield Road.
- Widening of South Road across the railway line - Widening of south road over the railway line for the creation of a bus lane.
- Accesses (3no.) onto Beaconsfield Road.

The development shall be carried out in accordance with the Development Specification and the Parameter Plans appended to that document. An illustrative Masterplan (Drawing Ref. 0317_P1017Rev 00) has been devised to demonstrate how the application proposals could be delivered. Further details of the Application Site and proposed development are set out in the Design and Access Statement and Planning Statement accompanying the outline planning application.

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DOCUMENTS

Document 1:	Southall Primary Shopping Area
Document 2:	Plan showing major national retailers in Southall, Chiswick, Fulham and Hammersmith
Document 3:	Table 25: Expenditure draw of the proposed floorspace at 2016 across Zones 1 to 30 based on the WLRNS's trade draw pattern
Document 4:	Town Centre Health Checks
Document 5:	Design Iterations
Document 6:	Layout of Feltham Town Centre Scheme
Document 7:	Sequential Assessment
Document 8:	Cinema Gap Analysis

SECTION 1: INTRODUCTION

- 1.1 This Retail Assessment has been prepared by RPS, on behalf of National Grid Property Limited, in support of the new retail floorspace proposed as part of a comprehensive mixed-use redevelopment of the former Southall Gas Works site (to be known as 'West Southall').
- 1.2 The application proposals would deliver a high-density mixed use development comprising residential, commercial, leisure, retail and hotel facilities, together with community facilities, open space and landscaping. It is envisaged that this would provide a first class urban regeneration of this brownfield site. The new link roads, to be provided in phases, are essential for the delivery of development of this site, as is the extensive remediation works. Full details of the proposals are set out in the Planning Statement that accompanies the application, however the component parts of the application are as follows:-
- 3,400 – 3,750 residential dwellings;
 - 3,500m² of employment floorspace;
 - 20,050m² of retail floorspace;
 - 17,740m² of leisure uses, which include a cinema, hotel, conference and banqueting facilities; and
 - 6,000m² of community and health facilities, which includes a nursery and primary school.
- 1.3 The proposed retail floorspace of the scheme can be broken down as follows:
- Convenience (supermarket) - 5,850m² (gross)
 - Comparison (non-food) retail units - 14,200m² (gross)
- 1.4 The floorspace will be in a range of unit sizes from approximately 183m² to 5,277m² (GEA).
- 1.5 This Report assesses both the comparison and convenience elements of the retail floorspace. Specifically, it assesses whether the proposals meet the retail 'tests' embodied in PPS6, namely need (both quantitative and qualitative), scale, impact and the sequential test. The accessibility of the site by a choice of means of travel, the final test of PPS6, is dealt with in the Transportation Assessment prepared by SBA. The Report also considers whether the retail element of the proposal constitutes an 'appropriate element of retailing', consistent with site specific Policy 10.21 of the adopted Ealing UDP (October 2004) and how the proposals accord, or otherwise, with the emerging Local Development Framework documents. Finally, the Report also considers the proposals in the context of the recently published (July 2008) consultation draft amendment to PPS6.
- 1.6 This Report is structured as follows:
- Section 2 - A review of the current and emerging national, strategic and local planning policy context. This includes the Council's Regeneration Strategy for Southall Town Centre (October 2004), the recently published LDF document entitled New Issues and Options – Strategy and Sites (September 2007) and the

Council's draft Framework for Southall (November 2007).

- Section 3 - This provides an explanation of the way in which Southall functions as a town centre and identifies its strengths, weaknesses and opportunities.
- Section 4 - An assessment of the capacity for additional convenience and comparison goods floorspace in Southall in the period up to 2016 (quantitative need). The assessment is based on the West London Retail Needs Study (WLRNS), 2006, commissioned by the London Boroughs of Ealing, Hounslow and Hammersmith and Fulham. The contribution the proposals will make to meeting the qualitative retail needs of Southall are also considered.
- Section 5 - An assessment of the impact of the proposals on Southall town centre and other relevant centres.
- Section 6 - An assessment of the proposals against two of the other key policy tests of PPS6: scale and the sequential test. The final test of PPS6; namely accessibility is dealt with in the Transport Assessment.
- Section 7 - An assessment of the cinema element of the proposal, against the relevant tests of PPS6.
- Section 8 - Conclusions.

1.7 This assessment should be read in conjunction with the full suite of documents submitted in support of the application and the Environmental Statement.

1.8 The comprehensive redevelopment of this site will bring forward a welcome regeneration of this long neglected part of Southall. It will deliver significant new housing and other uses on a despoiled, brownfield site. The retail component of the proposals is fundamental to the overall success of the scheme. It will both deliver a much needed "seed change" to the retail offer of Southall Town Centre, to which it will be complementary, together with providing for the day-to-day shopping needs for the new residents of the 3,400 – 3,750 new homes to be provided at the site. By providing retail floorspace in conjunction with the housing it will deliver a sustainable pattern of living.

1.9 As this report will show, the quantum, form and scale of retail floorspace proposed is wholly supportable. In particular:

- It will enable Southall to recapture a significant component of its locally generated retail expenditure that is currently leaving the centre for other more distant but superior shopping centres. This will deliver a more sustainable pattern of shopping;
- It will result in a qualitative improvement in the retail offer of Southall as a shopping centre. In particular it will attract national multiple retailers who are currently poorly represented in the centre. This will deliver a seed change in the role of Southall as a shopping centre making it consistent

with its established policy position in the shopping hierarchy;

- There will be no unacceptable retail impact either on Southall town centre or any nearby competing centre. Rather the proposals will diminish the need for people to travel long distances for their existing shopping needs thereby encouraging them to undertake a greater proportion of shopping and related spending in Southall town centre; and
- It will deliver a truly mixed use development, consistent with all strands of planning policy. The retail component is consistent with that vision and will enable the residents and workers of Southall to undertake most of their day to day shopping in the place where they live or work.

1.10 Throughout this report, where monetary values are used, they are in constant 2005 prices. It is the same price base as used in the West London Retail Needs Study 2006 (WLRNS).

SECTION 2: PLANNING POLICY

a) PPS6: Planning for Town Centres (March 2005)

2.1 PPS6, adopted in March 2005, provides the Government's current advice on retail and other town centre developments. Its general thrust is now well established. In particular, it builds upon the Government's commitment to sustainable development by encouraging local authorities to actively plan for growth and manage change in town centres over the period of their development plan documents. It urges local authorities to actively plan for such growth, where relevant, by (paragraph 2.3):

“Selecting appropriate existing centres to accommodate the identified need for growth by:

- **making better use of existing land and buildings, including, where appropriate, redevelopment;**
- **where necessary, extending the centre.**

Managing the role and function of existing centres by, for example, promoting and developing a specialist or new role and encouraging specific types of retail in some centres; and

Planning for new centres of an appropriate scale in areas of significant growth or where there are deficiencies in the existing network of centres.”

2.2 The advice in PPS6 on planning for retail growth and managing change within existing centres is particularly relevant to these proposals. Southall is a town centre where significant retail growth is both appropriate and required. First, retail growth is required to off-set the current deficiency in retail provision within a centre of this rank and importance in the shopping hierarchy. Secondly, growth is required to meet both the increase in expenditure associated with the existing population and also that which will arise from the substantial planned housing growth. Consistent with Government guidance that growth should come forward on a planned basis, these proposal will do exactly that.

2.3 Paragraph 2.4 of PPS6 suggests that whenever possible new growth should be accommodated within existing centres. Where that is not possible, paragraphs 2.5 and 2.6 advise:

“2.5 Where growth cannot be accommodated in identified existing centres, local planning authorities should plan for the extension of the primary shopping area if there is a need for additional retail provision or, where appropriate, plan for the extension of the town centre to accommodate other main town centre uses.

2.6 Where extensions of primary shopping areas or town centres are proposed, these should be carefully integrated with the existing centre both in terms of design and to allow easy access on foot. Extension of the primary shopping area or town centre may also be appropriate where a need for large developments has been identified and this cannot be accommodated within the centre. Larger stores may deliver benefits for consumers and local planning authorities should seek to identify, designate and assemble larger sites adjoining the primary shopping area (ie. in edge-of-centre locations).”

- 2.4 As this Report will demonstrate the scale of growth contemplated for Southall and, indeed required if it is to fulfil its proper role in the region's retail hierarchy, is not capable of being provided within the defined centre itself. In that scenario an extension to the retail centre in the manner of these proposals is the next best option and is consistent with the PPS's advice.
- 2.5 At paragraph 2.20, PPS6 explains:
- “The Government is concerned to ensure that efficient use should be made of land within centres and elsewhere. Local planning authorities should formulate planning policies which encourage well designed, and, where appropriate, higher density, multi-storey development within and around existing centres, including the promotion of mixed-use development and mixed-use areas.”**
- 2.6 Again it need hardly be said that these proposals are wholly consistent with this advice.
- 2.7 The key points of PPS6 relevant to the consideration of the application proposals can be summarised as follows:
- In the introduction of the document the Government states that the following wider policy aims are relevant; to promote social inclusion, to regenerate deprived areas, create new and additional employment opportunities and an improved physical environment; to promote economic growth of regional, sub-regional and local economies; to deliver more sustainable patterns of development, ensuring that locations are fully exploited through high density, mixed-use developments and promoting sustainable transport choices including reducing the need to travel and providing alternatives to car use (paragraph 1.5);
 - The scale of new facilities should be directly related to the role and function of the centre and the catchment that they seek to serve; and
 - Need, scale, impact, the sequential test and accessibility are the key considerations. However, local planning authorities should also consider relevant local issues and other material considerations (paragraph 3.5). These material considerations may include physical regeneration, employment (high skill opportunities or opportunities that are particularly important given the local labour market), economic growth and social inclusion (paragraph 3.2a).
- 2.8 The Parameter Plans with which the development will accord incorporate many of these key elements of national policy. The retail element of the proposals is centrally located within a truly mixed-use scheme and would form the heart of the new community where residents and visitors would have excellent access to a range of facilities which would ensure that they will not need to travel long distances for most of their day to day needs.

- 2.9 The retail component will also serve the retail needs of Southall's existing catchment area. Currently the town centre fails to provide the range, quantum, choice and quality of retail offer sought by those existing residents. As a consequence they are choosing to shop elsewhere. This is not a sustainable shopping pattern. These proposals will redress that imbalance.
- 2.10 Within the terms of PPS6 the proposals can be defined as 'edge-of-centre'. That is, after a town centre location, they are in the next most preferred location for new retail development. Only if a town centre site exists which could accommodate the proposals should it be preferred over this site. In practical terms, given the scale of the scheme and the clear and unambiguous need to bring about a step change in the retail role of Southall it is inconceivable a town centre site exists that could deliver the benefits associated with this proposal. Nevertheless, this report includes a full sequential assessment which shows there are no sequentially preferable sites to which the proposal, or a reasonably flexible format of it, could otherwise locate.
- 2.11 Given the site's edge-of-centre designation it is necessary to ensure that the proposals meet the following key tests.
- i) Need
- 2.12 PPS6 states that greater weight should be given to quantitative need, albeit recognising that qualitative issues are an important component of need. The Guidance also states that quantitative need should be goods based rather than business based. Furthermore, quantitative need should be expressed in terms of the broad categories of 'convenience' and 'comparison' goods.
- 2.13 Paragraph 3.8 of PPS6 confirms that:
- “It is not necessary to demonstrate need for retail proposals within the primary shopping area or for other main town centre uses located within the town centre.”**
- 2.14 However:
- “Need must be demonstrated for any application for a main town centre use which would be located at edge-of-centre or out-of-centre locations and which is not in accordance with an up-to-date development plan document strategy.”** (paragraph 3.9).
- 2.15 The Guidance states that the quantitative need for additional floorspace should normally be assessed no more than five years ahead, as sites in the centre may become available within that period. However, it recognises that a longer time period may be appropriate where large town centre schemes are proposed and to allow for site assembly.
- 2.16 PPS6 states that qualitative issues can also be used to provide additional justification for a proposal. These relate to the need to provide for consumer choice through ensuring an appropriate distribution of shopping locations, to improve accessibility for the whole community and ensuring provision of a wide range of sites to meet the needs for the whole community, particularly those living in deprived areas. PPS6 states that regeneration and employment are not indicators of need, but may be material

considerations. The weight to be given to such factors will depend on local circumstances.

ii) Sequential Test

2.17 In encouraging new retail provision, PPS6 applies the sequential approach, which is set out in paragraph 2.44, as follows:

“The sequential approach requires that locations are considered in the following order:

- **First, locations in appropriate existing centres where suitable sites or buildings for conversion are, or are likely to become, available within the development plan document period, taking account of an appropriate scale of development in relation to the role and function of the centre; and then**
- **Edge of centre locations, with preference given to sites that are or will be well connected to the centre; and then**
- **Out of centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of former links with the centre.”**

2.18 Annex A to the PPS provides various definitions of terms used through the document including a definition of an edge-of-centre site. It is:

“For retail proposals, a location that is well connected to and within easy walking distance (ie. up to 300 metres) of the primary shopping area.”

2.19 The primary shopping area (defined in Table 2 of Annex A) comprises both primary and secondary shopping frontages and forms the area where retail development is concentrated. For Southall the extent of its primary shopping area is shown on Plan JLI0719/02 at Document 1.

Document 1

2.20 In considering whether a site does fall to be considered as edge-of-centre the PPS recognises there needs to be a degree of judgement. Hence it notes:

“In determining whether a site falls within the definition of edge-of-centre, account should be taken of local circumstances. For example, local topography will affect pedestrians’ perceptions of easy walking distance from a centre. Other considerations include barriers, such as crossing major roads and car parks, the attractiveness and perceived safety of the route and the strength of the attraction and size of the town centre. A site will not be well connected to a centre where it is physically separated from it by a barrier such as a major road, railway line or river and there is no existing or proposed pedestrian route which provides safe and convenient access to the centre.”

2.21 The nature of the walk from the proposed retail units to the main parts of Southall town centre is something we consider in Section 6 of this Report. We also describe how it is proposed to enhance the

connectivity between the site and town centre so that they function as one. In short, the location of the retail component of the scheme can quite properly be considered as an edge-of-centre location in PPS6 terms.

2.22 Next at paragraph 3.13 the PPS6 states that the sequential approach should be applied to all development proposals for sites that are not in an existing centre nor allocated in an up to date development plan document. It goes on to state that the relevant centres in which to search for sites will depend on the overall strategy set out in the development plan, the nature and scale of the development, and the catchment that the development seeks to serve.

2.23 In this case the proposed retail floorspace is to serve the needs of Southall's residents, both existing and proposed and its immediate hinterland. The primary catchment area corresponds to Zones 9 and 10 of the WLRNS (see later). In that context the relevant centre in which to search for a sequentially preferable site is Southall town centre itself. Other centres within these zones, for example, North Hyde and Dormers Wells, do not carry a rank within the retail hierarchy of sufficient scale such that they should be considered as sequentially alternative locations for the quantum of floorspace proposed. Put simply, if the proposals could be located in either of those centres it would be out of scale with the centre's established shopping role.

2.24 PPS6 states that in considering alternative sites, developers should be able to demonstrate that they have been flexible about their proposed business model in terms of:

- The scale of their development
- The format of their development
- Car parking provision
- The scope for disaggregation (paragraph 3.15)

2.25 However, paragraph 3.16 of PPS6 states that local planning authorities should be realistic in considering whether sites are suitable, viable and available, and that they should take into account any genuine difficulties in terms of scale, format, car parking and the scope for disaggregation, such as where the retailer would be required to provide a significantly reduced range of products. We consider the issue of flexibility in Section 6 of this Report.

iii) Scale and Impact

2.26 PPS6 requires the scale of new facilities to be directly related to the role and function of the centres and the catchment they seek to serve.

2.27 Paragraph 3.21 states that, in assessing sites, local planning authorities should consider the impact of the proposal on the vitality and viability of existing centres within the catchment area of the proposed development. It goes on to state that the identification of need does not necessarily indicate that there will be no negative impact. We address in detail the questions of scale and retail impact in the subsequent sections of this Report.

iv) Accessibility

2.28 PPS6 also requires developments to be accessible by a choice of means of transport. It requires local authorities to consider whether developments are or will become genuinely accessible. As already indicated this test of PPS6 is addressed in the Transport Assessment prepared by SBA.

b) Proposed Changes to PPS6: Planning for Town Centres (Consultation, July 2008)

2.29 In July 2008, draft amendments to PPS6 were published for consultation. The amendments do not revisit the fundamentals of the policy contained in PPS6, but intend to improve its effectiveness, in terms of promoting vibrant and viable town centres.

2.30 The key changes proposed to PPS6 relate to the way in which certain planning applications are assessed. Specifically:

- The proposed changes remove the requirement for an applicant to demonstrate 'need' for a proposal which is in an edge of centre or out of centre location and which is not in accordance with an up-to-date development plan strategy.
- It establishes a new impact assessment framework, which adopts a broader focus with emphasis on economic, social and environmental, as well as strategic planning impacts.

2.31 Importantly, paragraph 3.19a of the Consultation Document confirms that the assessment of the impact of a development will be a key consideration in determining the acceptability of proposals. Paragraph 3.19e goes on to set out the key town centre impact considerations, both positive and negative, as follows:

- “i) How the proposal relates to the development plan for the area;**
- ii) The impact on existing, committed and planned public and/or private investment in a centre or centres in the area;**
- iii) Whether a proposal which is in or on the edge of a town centre is of an appropriate scale (in terms of gross floorspace), in relation to the size and role of the centre and its catchment, taking account of the considerations in paragraph 2.41-2.43 of this Policy Statement;**
- iv) In the context of a retail or leisure proposal, whether there will be an impact on in-centre trade/turnover, taking account of current and future consumer expenditure capacity in the catchment area; and**
- v) The extent to which the proposal will promote or undermine town centre vitality and viability, including local consumer choice and retail diversity in terms of the range, type and quality of goods.”**

2.32 The above criteria are all addressed in some detail in Section 5 of this Statement, however, dealing with each briefly in turn:

- i) The Southall Gas Works site is identified for mixed use development, including an 'appropriate element' of retail in the adopted Ealing UDP. The maintenance, and where necessary improvement, of the function of Ealing's existing centres is central to the shopping policies of the UDP; the application proposals are entirely consistent with this approach. Further, the extension of Southall's town centre boundary to include the Gas Works site is one option being considered as part of the emerging LDF.
 - ii) The comprehensive redevelopment of the Gas Works site represents significant investment that will bring forward regeneration and remediation of a long neglected part of Southall, delivering significant new housing and a much needed 'step change' in the retail offer of Southall town centre.
 - iii) The quantum of floorspace proposed is wholly appropriate to the scale of Southall, in terms of both its size and particularly its role as a Major Centre within West London; it will bring the offer of Southall more in line with the other competing Major Centres of Chiswick, Hammersmith and Fulham. Further, the impact on trade/turnover currently drawn to Southall town centre, taking account of current and future consumer expenditure capacity in the catchment, would at the very worst be around 8% (please note: the basis for this figure is fully explained and justified in Section 5). Indeed, in that the proposed floorspace will function in conjunction with the existing town centre it has the potential to have a positive impact on the centre through retaining shoppers and their spend within the centre.
 - iv) The proposal will significantly enhance both local consumer choice and retail diversity in Southall; it will improve the shopping mix through the introduction of national multiple retailers, who are currently under-represented within Southall and for which there is a recognised requirement. Further, the presence of national multiples will greatly enhance the appeal of the centre to both consumers and investors. This would be to the benefit of the town centre as a whole.
- 2.33 Paragraph 3.19g of the proposed changes goes on to explain that in addition to the above key town centre impact considerations, other wider impacts resulting from a proposed development will also be relevant. In particular:
- i) The impact on allocated sites outside town centres being developed in accordance with the development plan;**
 - ii) The accessibility of the proposal by a choice of modes of transport including walking, cycling, public transport and the car, taking account of the extent to which it will reduce or increase the overall distance travelled by car, the effect on local traffic levels and congestion (especially to the trunk road network) after public transport and traffic management measures have been secured, and the extent to which the proposal will form links with existing centres to promote linked trips and town centre vitality and viability;**
 - iii) The extent to which the proposal benefits deprived areas and promotes social inclusion;**
 - iv) How the proposal will affect employment in the area, particularly whether it will create new jobs (in terms of full time equivalents) and lead to a net increase in employment;**

- v) **In the context of retail proposals, the extent to which a development will 'claw back' trade leaking outside the catchment area of the proposal;**
- vi) **The extent to which a proposal will help promote or undermine economic and physical regeneration in the area within five years of the implementation of the proposal; and**
- vii) **The extent to which the proposal makes efficient and effective use of land, including reuse of previously developed land."**

2.34 Again, Section 5 of this Statement includes a full and comprehensive assessment of the impact of the proposals. For ease, however, the way in which the proposals relate to each of the above is summarised below:

- i) As outlined above, Southall Gas Works itself is identified in the adopted Ealing UDP as both a 'Special Opportunity Site' and a 'Development Site', suitable for a mix of uses including an element of retail.
- ii) The accessibility of the site by a choice of modes of transport is addressed fully in the Transport Assessment that accompanies the application. The proposals will, however, significantly improve the retail offer of Southall, thereby retaining expenditure currently lost to other competing Major Centres in West London and reducing the distance travelled by Southall's residents to fulfil their shopping needs. The retail proposals for the Gas Works site (and indeed the other mixed uses proposed) are designed as an extension or adjunct to Southall town centre; they will work together, with strong links between the two, and function as one shopping destination.
- iii) The proposals would promote social inclusion by providing a retail offer that is currently lacking in Southall, better serving, in particular, second and third generation residents. It directly responds to an identified retail need in the area.
- iv) The retail element of the proposals, but also the wider mix of uses, which includes 3,500m² of employment floorspace and 17,740m² of leisure uses, will create significant new employment opportunities for local people.
- v) The WLRNS (see later) demonstrates, for example, that only 5.6% of those questioned in Southall (Zone 10) shop in the town centre for fashion items. In contrast, 38.2% and 25.8% travel to Hounslow and Ealing respectively for their fashion shopping, indicating a substantial outflow of shoppers and therein expenditure. This pattern of outflow is repeated across most other goods categories. The proposals would help to 'claw back' this lost expenditure and help Southall to fulfil its correct position in the retail hierarchy, something it is currently failing to do.
- vi) The application proposals represent major investment in Southall that would result in and promote both economic and physical regeneration in the area within five years (and beyond) of implementation of the scheme.
- vii) The proposal maximises efficient and effective use of land. It represents a genuine mixed use scheme, with residential floorspace successfully accommodated above the retail units.

c) **The London Plan Consolidated with Alterations since 2004 (February 2008)**

2.35 Policy 2A.18, Policies 3D.1-3 and Statements on Town Centres in Chapter 5 of the London Plan set out the strategic policies that will support development of London's town centres and guide the location of retail and leisure activity. Map 3D.1 and Annex 1 of the London Plan establish a network of town centres within London; Southall is identified as a 'Major Centre'. Major Centres are defined as:

"...Typically smaller in scale and closer together than those in the metropolitan category. Their attractiveness for retailing is derived from a mix of both comparison and convenience shopping. Some major centres, which have developed sizable catchment areas, also have some leisure and entertainment functions. Major centres normally have over 50,000m² of retail floorspace."

2.36 The closest other defined Major Centres to Southall are Hammersmith, Chiswick and Fulham to the east. Ealing and Hounslow are defined as Metropolitan Centres in the Plan.

2.37 Policy 3D.1 serves to support town centres. It specifically seeks to, *inter alia*:

- Encourage retail, leisure and other related uses in town centres and discourage it outside the town centres;
- Enhance the competitiveness and quality of retail and other consumer services in town centres;
- Support a wide role for town centres as locations for leisure and cultural activities, as well as business and housing and their key role in developing a sense of place and identity for sustainable local communities; and
- Encourage net additions to town centre capacity where appropriate to their role in the overall network.

2.38 Paragraph 3.266 of the London Plan acknowledges that increases in consumer expenditure will be one of the greatest drivers of change across London. It goes on to recognise that:

"Between 2001 and 2016 expenditure on convenience goods is expected to increase by 2.0% per annum and that on comparison goods by 4.8%. Taking into account variables like floorspace productivity and sales densities, this could mean that London will require 0.1-0.3 million sqm more convenience floorspace in gross terms, though this will be reduced if the existing development pipeline is built out. There could still be a net need for 0.8-1.2 million sqm of comparison floorspace even when the development pipeline is built out."

2.39 Against this context, the Mayor supports the Government's policy of strongly promoting consumer activities in town centres. It is recognised, at paragraph 3.268, that the vitality and viability of town centres will be enhanced by a wider range of uses and that leisure and high density housing can lever in resources for comprehensive town centre renewal, as part of mixed use development and expansion.

2.40 In terms of the location of retail development, Policy 3D.2 of the London Plan requires DPD policies to:

- **“Assess the need and capacity for additional, retail, leisure, commercial and other town centre development and reconcile these by making appropriate provision following the sequential approach outlined below.**
- **Relate the scale of retail, commercial and leisure development to the size and role of a centre and its catchment and encourage appropriate development on sites in town centres in the network. If no town centre sites are available in the network, provision should be made on the edge of centres in the network.**
- **Encourage additional comparison goods capacity in larger town centres and convenience goods capacity in smaller centres of appropriate scale, especially district centres, to secure a sustainable pattern of retail provision.**
- **Treat proposals for out of centre development or for intensification or expansion of existing out of centre retail facilities in line with Policy 2A.8.**
- **Manage existing out or edge of centre retail and other service provision in line with the sequential approach, seeking to reduce car dependency and traffic generation and to improve public transport access to promote more sustainable forms of development.”**

2.41 The application proposals are consistent with Policy 3D.2; as demonstrated in the following sections of this Report there is capacity for the additional retail floorspace proposed, it is of an appropriate scale to the size and role of Southall town centre and there are no town centre sites within Southall to which the proposals could otherwise locate.

2.42 Southall falls within the West London Sub Region, where paragraph 5.168 of the London Plan acknowledges that there is likely to be significant growth in consumer expenditure that could generate demand for 145,000 – 227,000m² additional comparison goods floorspace to 2016. Paragraph 5.168 goes on to explain that strategically designated town centres in the West London Sub Region (such as Southall) should be considered as opportunities for more intensive development and boroughs should consider how their roles could be consolidated or enhanced to meet retail and other consumer needs and to increase capacity for mixed use development including housing.

d) West London Sub-Regional Development Framework (May 2006)

2.43 The West London Sub-Regional Development Framework (SRDF), published in May 2006, identifies (at paragraph 49) that within the region *‘population and consumer expenditure growth is generating significant need for new retail space, in particular for comparison goods’*. It outlines that:

“Resident-based consumer expenditure in the sub-region on comparison goods is expected to almost double from £3.3 billion to £6.5 billion between 2001 and 2016 and convenience goods expenditure is expected to increase but at a more modest rate of about 30% from £2.1 billion to £2.7 billion.”

2.44 This translates into a need for an extra 120,000m² to 185,000m² of comparison goods floorspace in West London between 2001-2016 (paragraph 50 of SRDF) and between 12,000m² and 46,000m² of additional convenience floorspace over the same period (paragraph 52).

2.45 The SRDF recognises that:

“Whilst these estimates are the best available at the sub-regional level, they need to be treated with caution. Using their own local need assessments, boroughs are encouraged to undertake finer grained distributions of need for convenience floorspace taking into account qualitative need including the complexion of the existing retail offer, under/over-trading, accessibility and the scope for improvement of out-moded existing convenience floorspace. Potential capacity within town centres should be exploited as a first priority in accordance with the sequential test and especially (although not exclusively) district centres which are particularly accessible to residents by sustainable modes of transport” (paragraph 54).

2.46 With this context, Southall is identified in Table 2.2 of the SRDF as a Major Centre in the region (alongside Wembley, Kilburn, Hammersmith, Fulham, Uxbridge and Chiswick) with an ‘indicative’ comparison goods floorspace need to 2016 of 4,000-5,000m². Annex 1 of the SRDF comments that Southall has a:-

“Specialist role with strong multicultural dimension. Regeneration of centre should be supported through qualitative improvements to the environment and mix of town centre uses including housing to complement existing retail offer.”

2.47 The proposals for Southall Gas Works are consistent with this objective.

e) Ealing Unitary Development Plan (October 2004)

2.48 The Ealing UDP was adopted in October 2004. The Gas Works site is identified as a ‘special opportunity site’ and a ‘development site’ (Policies 10.1 and 10.21). These sites are considered suitable for mixed-uses. Designation 10.21 acknowledges the appropriateness of retail development as part of a mixed-use development:

“A masterplan is required. Sites suitable for mixed-uses including employment, housing, open space (local park), community, sports and an appropriate element of retail, subject to major improvement to this site’s accessibility...”

2.49 Shopping Policy 7.1 seeks to promote and enhance a network of centres and promote key sites, Southall Gas Works being identified as one of the latter. It states:

“1. The Council will seek to maintain, and where necessary improve the function, character, vitality and viability of the existing shopping hierarchy, by recognising the distinctive function of:

- metropolitan;
- major;
- district and neighbourhood centres; and
- local parades.

2. In order to achieve this, the Council will endeavour to achieve the highest quality environment and surroundings for all who use the Borough's shopping centres.
3. The Council will encourage appropriate development on key sites within the town centres of Ealing, Southall, Acton, Greenford and Hanwell, including about 16,500m² of new net retail floorspace in Ealing Metropolitan Centre (Ealing Broadway - about 13,000m² and West Ealing – about 3,500m²).

2.50 In relation to Southall's existing function, the supporting text on page 100 of the UDP states:

“Southall town centre is growing in significance. This major centre, with its diverse community and range of cultures, has a reputation as an excellent centre for Asian retailing, the Council aims to sustain the vitality of the existing shopping centre and broaden the range of facilities available.”

2.51 Policy 7.2 mirrors national guidance in relation to the tests for development outside designated centres including need, scale, impact and the sequential test considerations. It states that:

1. The Council expects all significant new development of shopping and other town centre uses to take place in existing centres, at a scale appropriate to their position in the shopping hierarchy. Where shopping and other key town centre uses are proposed outside an existing centre, account will be taken of retail need, the sequential approach, and the effect on the vitality and viability of existing centres.
2. Only where a need for additional retail floorspace has been established and a suitable site is not available in the centre or on the edge of the centre, it may be appropriate to combine the proposal with an existing out of centre retail area and negotiate public transport improvements.
3. In considering all retail development proposals, the Council will require that development is suitable in terms of its design, including scale, integration, mix and character. There should also be an acceptable traffic impact, including the minimisation of car borne traffic and very good public transport, cycle and pedestrian accessibility.”

2.52 These proposals are wholly consistent with this policy. First, as this Report demonstrates, there is a clear and unambiguous need for the proposed floorspace. That need is acknowledged across a range of policy documents. Secondly, consistent with the second part of the policy, this is an edge-of-centre site with strong functional links with Southall town centre itself. It is, as such, in the absence of a true town centre site, the next best location for this type of development. Thirdly, the proposal is of an appropriate scale. It will enable Southall to retain more of its locally generated expenditure consistent with its role as a designated Major Centre.

f) Southall Town Centre Strategy (October 2004)

2.53 The Southall Town Centre Strategy, prepared jointly by LB Ealing and the Southall Regeneration Partnership, in October 2004, sets a vision for the future of Southall over the next 10-15 years. The analysis of Southall's strengths and weaknesses is considered in the subsequent section. It is evident from the strategy that the redevelopment of the Gas Works site is seen as an integral component of the regeneration of the centre. The site is identified as a major opportunity on the town centre indicator

table and as a 'flagship opportunity' in the 'Strengths, Weaknesses, Opportunities and Threats' table in Section 5.

2.54 The vision in Section 6 states:

“Redevelopment of the British Gas site for mixed uses including housing, employment, leisure uses and conference facilities will enable the expansion of the town through complementary uses and buildings that consolidate but do not compete with the town.”

2.55 Again, the application proposals are consistent with this overall vision.

g) LDF: New Issues and Options – Strategy and Sites (September 2007)

2.56 The LDF Strategy and Sites document (September 2007) identifies three potential alternative futures for Southall:

- Future A: Following Established Policies
- Future B: Embracing Change
- Future C: Protecting the Past

2.57 The 'embracing change' option envisages a major review of the shape and nature of the town centre, as well as the role of Southall Gas Works. Importantly, this option proposes to include part of the Southall Gas Works site in the town centre boundary and identifies it for *'new retail, residential and commercial development, alongside new community facilities and open space (to address current under-provision)'* (paragraph 5.104) (our emphasis).

2.58 The document, at paragraph 5.301 establishes the three alternative future scenarios for Southall Gas Works (consistent with the general themes above):-

	Future A	Future B	Future C
Southall Gas Works	Mixed uses, including employment, housing, open space (local park), community, sports and an appropriate element of retail, subject to major improvement to the site's accessibility. Potential for links with adjacent country park. Potential for new road and tram routes through the site with land to be safeguarded for a tram depot fully meeting service and operational requirements (up to 4ha). Development to cater for Southall Gateway link road, providing an east-west route across the site to the A312 and Uxbridge Road. (Development Site 43).	Landmark urban development, creating a new retail focus and modern business and cultural facilities for Southall Town Centre, and an attractive new neighbourhood of up to 3,600 new homes, a five acre local park linked by bridges to Minet Park in the green belt. Development overlooking the canal and a new primary school and other local community facilities. Develop site and adjoining land so that it improves transport access within and through Southall, possibly using Southall gateway link road as main access.	Residential development including a range of medium to large family housing and some higher density small units to the east of the site. Development should include a local park and a small neighbourhood shopping centre for convenience goods, with community facilities to meet the needs of this part of Southall. Good transport links to the town centre.

2.59 Consultations on the New Issues and Options document were sought during the final part of 2007 and the Council is currently considering the responses received. The Council's Preferred Options document should be published for further consultation later this year. Notably each of the three options above suggest an element of retail use at the site would be appropriate. Moreover, only under Option C is the retail component described as small-scale.

2.60 The September 2007 document sets a series of issues with options broadly corresponding to the development strategies, A, B or C outlined above. Those issues look at how the borough might achieve its 10 borough-wide objectives as set out at paragraph 4.1.

2.61 Of these 10 objectives, the ninth is:

“Achieving and sustaining prosperity for communities and businesses across Ealing.”

2.62 In the context of Southall and this objective, Issue 9.2 asks:

“How should we promote Southall Town Centre”.

2.63 Three options in answer to this question are then provided 9.2a, 9.2b and 9.2c. The second, 9.2b is:

“Reconsider the boundary of the town centre and take the opportunity for high quality retail and allied development on Southall Gas Works as part of a reconfigured centre to compliment Southall’s ethnic retail strength.”

2.64 As explained above, the Council's Preferred Options will emerge later this year. All that can therefore be said at this juncture is that the current proposals are wholly consistent with one of the three identified options for Southall Town Centre; namely Option 9.2b.

g) A Framework for Southall – Final Draft 2007

2.65 In May of this year the Council published for public consultation the Framework for Southall. The Framework has arisen directly in response to the known development prospects for the Gas Works site. As the introduction to the document acknowledges its purpose is to provide:

“...policy content for decisions – responding to existing issues and problems, as well as a guide to inform future development opportunities.”

2.66 The Framework has been developed in collaboration with various stakeholders including the Council, local businesses, other public bodies and community and voluntary groups.

2.67 Section 3 of the Framework is concerned with retailing and Southall town centre. As the introduction to the chapter (paragraph 3.1) explains:

“This chapter looks at the situation today – the town centre as it is, and the policy context – and then reviews the key issues which must be planned for in the Framework. Two main themes recur: the issue

of quality in the existing centre, and the potential of the Southall Gas Works (SGW) site.”

2.68 The Framework recognises the unique nature of Southall town centre with its very strong emphasis and reliance on ethnic retailing. This said, it also acknowledges that this raises issues for the centre with, for example, paragraph 3.5.1 noting:

“With the exception of a few units in the northern half of the centre (such as Woolworths and Superdrug) there are no national multiples in Southall. The Retail Needs Study reports that 38% of those questioned expressed their desire for larger retailers. The introduction of more mainstream retailing would serve the needs of second and third generation ethnic-minority residents as well as reducing “leakage” of shoppers and spend to competing centres such as Ealing, Hounslow and Kingston.”

2.69 Against this background, the Framework identifies the potential for retail development on the Gas Works site as part of a mixed use proposal. Paragraphs 3.5.3 in commenting on the type of retailing notes:

- **“Food retailing at Southall Gasworks, serving the site itself and adjacent residential areas, would be unlikely to compete with, and could even strengthen the existing food retailing in Southall centre. Its competitors are outside the town itself, and not particularly well located for local residents.**
- **Comparison shopping can be justified by reference to the nature of Southall being very different – as per 3.5.1 above, the breadth of conventional retailing needs expanding. Whilst continuing to support the centre’s wider, arguably international catchment.”**

2.70 The Framework then goes on to put forward the following retail proposal for the Gas Works site as part of its comprehensive mixed use redevelopment:

- **“Retail expansion on the SGW site should be encouraged, but should be capped at a level which is judged to be capable of being handled by the transport system, is acceptable within a “special case” variant of existing policy, and adds no more than about 30% to the existing floorspace in Southall centre. The cap should be an additional 15,000m² (gross) maximum of which approximately 5,000m² would be a food store.**
- **The units would be predominately modern high street units in the range 90m² to 200m², to provide a good but not excessive range of shopping.”**

2.71 The proposals which form part of this application are self evidently consistent with the thrust of this guidance. They will tackle the issues identified earlier in the document; namely a lack of national multiples, the provision of larger modern units and a reduction in expenditure leakage. In doing so they go to the heart of what the Framework is trying to achieve.

SECTION 3: SOUTHALL TOWN CENTRE

- 3.1 Southall is defined as a Major Centre in the London Plan. The town centre stretches north from the railway station along South Road to the junction with The Broadway. The centre runs the length of The Broadway to the west, and part of the High Street to the east. To the south of the station, the centre extends along The Green and King Street.
- 3.2 The main retail core is located in the north section of the town centre along South Road, The Broadway, and High Street. This is where pedestrian flows are highest, with particular concentrations at the north end of South Street and the intersection with The Broadway. There is also a concentration of retailing at the south of the centre at The Green and good pedestrian flows between the two.
- 3.3 The WLRNS (in the accompanying 'Centres Assessment' document) identifies Southall as:
- “...well known as a vibrant multicultural centre with a strong Asian background and emerging Somali and Afghani communities.”** (paragraph 6.1)
- 3.4 The strengths of Southall town centre are also identified in Table 5 of the Southall Town Centre Strategy as:
- Unique, vibrant and multi-cultural town centre;
 - Specialist offer – good range of restaurants, jewellers/market food stalls;
 - Strong local convenience and discount facilities;
 - Family run businesses;
 - Low vacancy rates.
- 3.5 The retail offer in Southall is dominated by independent ethnic retailers selling a whole range of convenience and comparison goods. There is also a range of specialist professional services such as banks, travel agents and foreign currency exchanges. The specialist ethnic convenience offer of Southall is evident from the in-centre survey results that form part of the WLRNS. These are summarised in the table below (and compared to the other major centres in West London of Fulham, Chiswick and Hammersmith):

Table 1: What is the Main Purpose of your Visit Here Today?

Reason for Visit	Southall	Chiswick	Hammersmith	Fulham
Ethnic food shopping, halal/kosha foods	23.0%	0.0%	0.9%	0.0%

- 3.6 As evident from the above, 23% of respondents to the in-centre survey in Southall were undertaking ethnic food shopping as the main purpose for visiting the centre. 83% of respondents within Southall used Southall for specialist ethnic food products; whilst 24.7% and 4.3% of respondents from Hounslow and Hanwell respectively cited Southall as their main destination for specialist ethnic food products. In particular, Quality Foods and Sira are large draws for the centre.

3.7 The WLRNS identifies the range and quality of the ethnic retail offer:

“The ethnic retail offer varies in quality and size. Units vary in size from small corner shops to large purpose built units, there are several shopping centres and arcades/bazaars, as well as some large ethnic supermarkets such as Quality Foods. 21% of respondents to the in-centre survey liked the shops in Southall and 13% like the ethnic shops.” (paragraph 6.5 of the Centre Assessments)

3.8 There are very few national multiple retailers in Southall town centre. These are limited to Burton, Superdrug and Woolworths in the comparison sector, and Iceland and Somerfield in the convenience sector. In comparison Chiswick, Fulham and Hammersmith (comparable order centres) have a good range of national multiple retailers. The table below illustrates the contrasting position.

Table 2: National Multiple Representation in Southall and Comparable Order West London Centres

Centre	Southall	Chiswick	Fulham	Hammersmith	
Retailer	Comparison	Comparison	Comparison	Comparison	
	Burton	White Stuff	Superdrug	Boots x2	
	Superdrug	Waterstones	Virgin Megastore	WH Smith x2	
	Woolworths	The Body Shop	Boots x2	Benetton	
		Gap	Borders	Marks & Spencer	
		Superdrug	Ryman	HMV	
		Robert Dyas	WH Smith	TK Maxx	
		Boots	Specsavers	Mothercare	
		Woolworths	Currys	Specsavers	
		WH Smith		Habitat	
		Carpentryright		Currys	
		Lombok		River Island	
		East		Primark	
				Argos	
				New Look	
		Convenience	Convenience	Convenience	Convenience
		Iceland	Sainsburys Local	Tesco Express x3	Tesco Metro
		Somerfield	Marks & Spencer	Sainsburys Local x2	Marks & Spencer
			Tesco Express	Marks & Spencer	Sainsburys
			Sainsburys	Sainsburys	Iceland
				Waitrose	
				Somerfield	
				Iceland	

3.9 The shopping and service mix and lack of investment by national retailers is identified as a weakness of the town centre in the Southall Town Centre Strategy. So, for example, in commenting on the “Retail Offer” in the section of the strategy dealing with concerns and challenges it notes:

“The chart below illustrates that the dominate retail activities in the town centre are currently ethnic food shopping, professional services and travel agent use, with intermediate levels of use for restaurants, hardware and jewellery. Many respondents would like to see a Marks and Spencer, Tesco or similar multiple and western clothes shops in the town centre.”

- 3.10 The absence of national retailers and a range of convenience and comparison goods retailers (particularly fashion retailers), results in residents of Southall looking to other centres in West London to meet their shopping needs. A household telephone survey across 30 zones within Ealing, Hammersmith and Fulham and Hounslow was carried out in August/September 2006 by GVA Grimley as part of the WLRNS. The Southall Gas Works site and Southall town centre is identified as within Zone 10 albeit very close to the boundary with Zone 9. The purpose of the household survey was to establish current shopping patterns, town centre catchments and market shares. It is helpful in explaining the way in which Southall functions as a centre and indicates some of the weaknesses, identified above.
- 3.11 Considering first food shopping, the table below summarises where residents of Zone 10 currently undertake their main food shop. For completeness, we have also included the results for Zone 9 given the proximity of Southall town centre to zone.

Table 3: Convenience Goods Shopping Patterns (Zones 10 and 9)

Centre/Store	Main Food Shopping Zone 10	Main Food Shopping Zone 9
Tesco, Hayes	31.0%	6.5%
Tesco, Isleworth	9.2%	2.2%
Tesco, Western Avenue	9.2%	5.4%
Sainsburys, Hayes	8.0%	4.3%
Tesco, Yeading	5.7%	34.4%
Tesco, Greenford	5.7%	25.8%
Tesco Express, Hayes	3.4%	0%
Tesco, Southall	3.4%	1.1%
Sainsburys, West Ealing	2.3%	0%
Iceland, Southall	1.1%	1.1%
Somerfield, Southall	1.1%	5.4%
Sainsburys, Uxbridge	1.1%	2.2%
Other Southall Shops	1.1%	1.1%

NB: Figures derived from Q01 of Household Telephone Survey results (Appendix 5 of WLRNS). There is no Tesco store in Southall town centre – our understanding is that these responses actually relate to Tesco, Hayes.

- 3.12 The results in the above table are telling. In particular:
- For residents of Zone 10 the out of centre Tesco store at Hayes dominates food shopping. It attracts over 30% of all residents for their main shop.
 - Tesco’s other stores at Isleworth and Western Avenue together with Sainsburys store at Hayes (all of which are out of centre) attract a further 26.4% of Zone 10 residents

between them.

- In Zone 9 the two Tesco stores at Yeading and Greenford (out of centre) attract over 60% of that zone's residents for their main food shop.
- In contrast to this, all identified food retailers in Southall town centre attract just 3.3% of Zone 10's residents for their main food shop and 7.6% of Zone 9's residents. (Note: The store referred to as Tesco, Southall store is not in Southall town centre).

3.13 The weakness of Southall's position in attracting residents for their main food shop is illustrated by comparison with, for example, Chiswick; a similar order of centre. Again from Question 01 of the WLRNS survey the table below compares the attraction of Chiswick for main food shopping from its immediate catchment zone (Zone 17 in that case) against the attraction of Southall from Zones 10 and 9.

Table 4: Attraction of Chiswick for Main Food Shop Compared to Southall

% of Residents from Zone 17 Identifying Chiswick Stores for their Main Food Shop	% of Residents from Zone 10 Identifying Southall Stores for their Main Food Shop	% of Residents from Zone 9 Identifying Southall Stores for their Main Food Shop
78.2%	3.3%	7.6%

3.14 Whilst Chiswick may be particularly well provided for in terms of modern food stores, Southall's inability to attract more than 3.3% of Zone 10's main food shop and 7.6% of Zone 9's is highly indicative of its paucity of provision in food shopping.

3.15 Turning next to comparison shopping the table below summaries the results of the Household Survey in relation where residents of Zone 10 undertake a range of non-food shopping purchases:

Table 5: Comparison Goods Shopping Patterns (Southall – Zone 10)

Centre/Store	Clothes, Footwear & Other Fashion Goods	Furniture, Floor Coverings & Household Textiles	Personal/Luxury goods incl. CDs/DVDs, books, jewellery, china, glass, cosmetics.
Southall	5.6%	14.6%	6.5%
Ealing	25.8%	10.4%	24.2%
Hounslow	38.2%	10.4%	33.9%
Uxbridge	11.2%	4.2%	9.7%
Kingston	3.4%	6.3%	1.6%
Brent Cross (incl. IKEA)	2.2%	10.4%	0%
West End	4.5%	0%	6.5%
Harrow	0%	4.2%	0%
Greenford	2.2%	0%	1.6%
Hayes	2.2%	2.1%	3.2%
Ruislip	0%	8.3%	0%
Out-of-Centre Retail Warehouses	0%	16.8%	8.0%

Figures derived from Q08, Q14 and Q18 of Household Telephone Survey results (Appendix 5 of WLRNS).

3.16 The above table shows that there are similarities between the shopping patterns for the different categories of comparison goods. The following can be drawn from the table:

- Surprisingly, despite Southall town centre falling within Zone 10, it is not a popular location for non-food goods for local residents with only between 5.6% and 14.6% of respondents acknowledging they shop in Southall. The market share for clothes, footwear and other fashion goods is particularly low (5.6%).
- There is a considerable outflow of shoppers to both Ealing and outside of the Borough to Hounslow. Hounslow town centre is the dominant centre for residents of Zone 10, with 38.2% of respondents undertaking their fashion shopping within the centre.
- Out-of-centre retail warehousing (for example in Hayes, Hounslow and Yeading) attracts higher proportions of shoppers than Southall in the furniture, floor coverings and household textiles and personal/luxury goods categories.

3.17 Again it is instructive to compare Southall’s retention of shoppers for these key categories of goods against the retention levels achieved by comparable order centres. The table below compares Southall’s position against that for Chiswick, Fulham and Hammersmith.

Table 6: Retention Rates for Comparison Goods in Comparable Order Centres

Centre and (Zone)	Retention Rate for Clothes, Footwear & Other Fashion Goods	Retention Rate for Furniture, Floor Coverings & Household Textiles	Retention Rate for Personal/Luxury goods
Southall (Zone 10)	5.6%	14.6%	6.5%
Southall (Zone 9)	2.4%	15.7%	9.6%
Chiswick (Zone 17)	12.4%	5.9%	70.0%
Fulham (Zone 1)	13.9%	13.3%	30.6%
Hammersmith (Zone 2)	28.9%	15.2%	38.0%

3.18 It will be seen that whilst Southall (from both Zones 10 and 9) performs reasonably well in terms of shopping for furniture, floorcoverings and household textiles it performs woefully for fashion retailing and luxury goods. These survey results reinforce the established policy case for improving Southall’s retailer representation particularly in these higher order sectors. To do so will only be achieved by the provision of high quality, modern retail floorspace of a sufficient quantum to attract a critical mass of nationally recognised retailers in these sectors. Incremental additions to Southall’s retail provision will not achieve the “seed change” required to shift these established shopping patterns.

3.19 We now consider other indicators of the health of Southall as a retail destination. First yields in Southall have remained relatively stable, indicating little change in investor confidence. In 1994 they were 10% and improved to 8.5% in 1999, before falling back to 9.5% in 2001. In 2002 they improved marginally to 9.25% and in 2004 rose to 9%. Yields have been constant at 9.25% since 2004 (WLRNS, 2007). These are worse than the competing major centres of Hammersmith (9%), Fulham (9%) and Chiswick

(7%), again indicating one of the weaknesses of Southall identified in the Town Centre Strategy, namely investor confidence.

3.20 Southall's town centre environment is generally poor. The buildings predominantly date from the 1930s or earlier, and whilst there are individual buildings that are attractive and well maintained (such as the Town Hall and Himalaya Palace Cinema), the general quality of the shop fronts and floors above the shops is very poor and detracts from the centre's overall appearance and attraction.

3.21 The 'Centre Assessment' for Southall (that forms part of the WLRNS) identifies that:

"54% of respondents to the in-centre survey stated that they disliked the dirty and poorly maintained streets in Southall and 65% stated that it was too busy/crowded. 12% also stated that they felt unsafe. Popular improvements that respondents would like to see in Southall include larger retailers (38%), cleaner shopping streets (11%), improved policing and security measures (10%), more parking spaces (7%) and less overcrowding (5%)."

3.22 The poor quality of the environment is recognised as a threat in the Southall Town Centre Strategy (Table 5), particularly in terms of the perception for investors. The WRLNS (at paragraph 6.17) summarises the role and function of Southall town centre:

"Overall Southall is a healthy and viable centre, with a strong ethnic retail offer serving both its local catchment and attracting residents from across West London and beyond. Its vacancy levels are low and rents are relatively strong, having doubled in the last five years. It also has a good level of interest from convenience, comparison and service business. However, in our judgement it would benefit from a better supply of larger shop units to attract more mainstream multiple retailers into the centre. In the absence of this more mainstream offer we consider that there would be an increased leakage of shoppers and spend to other competing centres in West London."

3.23 The following sections of this report will demonstrate that the delivery of larger shop units and national retailers can be achieved on the Southall Gas Works site, without having a detrimental impact on the existing vitality and viability of Southall town centre, which is centred on its strong ethnic retail offer.

SECTION 4: QUANTITATIVE AND QUALITATIVE NEED

a) Introduction

4.1 Consistent with the current PPS6, this section of the Report assesses whether there is a 'need' for the proposed quantum of retail floorspace. Both quantitative and qualitative need are considered, albeit greater weight is given to the former as, in decisions of the various Secretaries of State, it is apparent that the former has tended to carry more weight. This should not however diminish the importance of the qualitative need in this instance given the acknowledged deficiencies in Southall's existing retail provision. There is in Southall's case a unique and particular qualitative need which we go on to consider and which carries significant weight in its own right. We deal first though with quantitative need.

b) Proposals

4.2 The retail component of the proposals is an integral element of the mixed-use scheme at Southall Gas Works. The shops would be close to proposed education, medical, leisure and employment uses and are intended to serve the immediate Southall catchment which will also include up to 3,750 new homes and up to 3,500m² of employment floorspace which will come forward as part of the comprehensive redevelopment of the site. In total up to 20,050m² (gross) of retail floorspace is proposed (both convenience or comparison floorspace).

4.3 The retail floorspace will comprise a 5,850m² (gross) supermarket, together with comparison goods floorspace arranged on either side of the East Street, which will be closely integrated with the employment and residential units. The 14,200m² (gross) comparison floorspace would be arranged in a number of unit sizes ranging from 188m² to 2,377m². The retail element of the scheme would be bought forward on a phased basis as each of the mixed-use blocks progress. The initial phase is expected to be completed (and trading commenced) by 2013. For the purposes of this assessment therefore a study year of 2016 for the whole retail component has been adopted. This would give time for a significant component of the retail floorspace to have been completed and for trading patterns to have become established. Although we have examined the case for all of the retail floorspace to be trading by this study year, in practice this is unlikely to be the case as some will come on stream beyond 2016. This builds robustness into our work.

4.4 The net to gross split for the comparison and convenience floorspace has been taken to be as follows. The percentages adopted reflect industry established levels :-

- Comparison (non-food) retail units: 14,200m² (gross); 11,360m² (net) **(80% net to gross)**
- Convenience (supermarket): 5,850m² (gross); 3,510m² (net) **(60% net to gross)**

c) Quantitative Need

- 4.5 In August 2006 GVA Grimley were instructed by the three West London authorities to undertake the West London Retail Needs Study (WLRNS). One of the primary objectives of the study was to identify the capacity for additional retail floorspace (both comparison and convenience) in West London for the period to 2021.
- 4.6 Their capacity assessment is informed by in-centre and household telephone surveys, as well as published population and expenditure data (derived from Experian). There are two stages to the assessment:
- Stage 1: Baseline capacity forecasts for convenience and comparison goods based on constant market shares (i.e. assuming no new development).
- Stage 2: Scenario and commitment testing, which considers the implications of commitments on the baseline capacity forecasts and tests of a series of growth rate and floorspace efficiency scenarios.
- 4.7 The household telephone survey covered 3,000 households across 30 survey zones, distributed proportionally to the population in each zone. Zones 4-10 are identified as representing a 'best fit' to the London Borough of Ealing boundaries. Southall town centre falls within Zone 10 albeit close to the boundary with Zone 9. The household telephone survey provides information on the market share for each of the 12 major West London Centres in the baseline position (i.e. at 2006 assuming no commitments).
- 4.8 Southall's market share (for both comparison and convenience goods) is illustrated below:

Table 7: Southall (Location Zone 10): Comparison and Convenience Goods Market Share (%)

	Market Share (%) within Best Fit Borough Zones	Market Share (%) within Location Zone
Comparison	1.5	5.5
Convenience	2.2	12.1

Note: Table 10.6 and 10.8 of WLRNS

- 4.9 As the table indicates, Southall's market share of available comparison and convenience goods expenditure within the 'best fit' borough zone and its own location zone is very limited. This limited market share is particularly evident when compared to competing major centres. For example Hammersmith and Chiswick, which are similar order retail centres, retain 27.1% and 25.2% of the available comparison goods expenditure in their location zone respectively (compared to Southall's 5.5%). Put simply both Hammersmith and Chiswick are currently retaining at least five times more of their available comparison spend than Southall is. This is highly indicative of a need to increase expenditure retention within Southall.
- 4.10 The market shares (set out above) are used to establish the baseline capacity forecasts for each centre. The WLRNS, however, recognises (at paragraph 10.57) that:

“It is perfectly reasonable for authorities to bring forward proposals to enhance market share and support more floorspace than identified in capacity forecast.”

4.11 Indeed the WLRNS goes further and expressly warns of the potential implications of not planning for growth beyond the baseline capacity projections. Hence at paragraph 40 of its summary it notes:

“It is important to point out that capacity projections set out in the report should not deter new development coming forward over and above the identified capacity figures. Indeed, new development and improvements to town centres and their overall retail and leisure offer, which would enhance market share, should be encouraged. In a ‘do nothing’ scenario, centres will decline and be unable to hold their position in the retail hierarchy. Other factors do, however, need to be taken into consideration, and follow-on work should support strategies for centres which start to focus on the commercial perspective for example discussions with developers and reviewing the viability of sites.”

4.12 This recognition of the limitation of the baseline analysis is significant and relevant to Southall. Where shopping centres within a catchment are performing well, maintenance of existing market shares (the baseline approach) may be reasonable. Where, however, a centre is performing poorly, as is the case with Southall, planning for growth on a constant market share approach merely perpetuates the under performance of that centre. In contrast planning for increased growth in such centres may deliver distinct planning advantages such as choice, competition and sustainable shopping patterns.

4.13 The WLRNS’s baseline capacity forecasts for Southall at 2016 are:-

- Comparison: 1,595m²
- Convenience: between –970m² & –2,909m² (depending on sales density applied)

4.14 Whilst this baseline forecast would suggest only limited capacity for further comparison floorspace and no capacity for additional convenience floorspace it is important to recognise that it is formulated on the basis of Southall’s existing very low retention rates. As already seen Southall is currently performing very poorly for the retention of both convenience and comparison spend when compared against comparable centres such as Chiswick, Fulham and Hammersmith. Only therefore if it is considered that those retention rates are correct and defensible in planning terms does this baseline forecast represent the true need for additional floorspace in Southall. As we go on to demonstrate, the current retention rates are not supportable in planning terms – they lead to positive planning harm – and hence the quantitative need case needs further consideration, as indeed GVA Grimley go on to do.

4.15 The second stage of the WLRNS capacity assessment tests alternative expenditure growth and sales efficiency scenarios and the impact of commitments on shopping patterns, market shares and capacity forecasts. As part of this, assumptions are made as to the trade draw of new schemes which are based on ‘a qualitative understanding of the scale and composition of schemes and the scale and health of the network of centres in the three West London authorities’.

4.16 The Study Brief for the WLRNS required specific consideration to be given to the (then) proposals for the Southall Gas Works site in addition to other known commitments such as the White City and Wembley proposals. The WLRNS assessed the proposals on the basis of the following quantum of retail floorspace for the Gas Works site:

- Comparison: 8,675m² (net)
- Convenience: 3,331m² (net)

4.17 The WLRNS reviewed the turnover of the proposed scheme and where such a scheme would draw its trade from. Paragraph 11.14 however recognises that:

“In reality, this floorspace figure is likely to change in any subsequent planning application but this figure provides an indication of the implications of a scheme on capacity in Southall and the centres in the three West London authorities.”

4.18 The composition of retail floorspace within these proposals does indeed differ from that contemplated by GVA Grimley in the WLRNS. Nonetheless, GVA’s consideration of the implications of a significant quantum of new floorspace on the site is helpful. In particular they analyse in their work how shopping patterns will change as a result of the provision of a significant amount of new retail floorspace (circa 12,000 sqm net) in Southall. Their work, because of its close comparisons to the current proposal provides a very good starting point for the consideration of the key retail tests of need and impact. For comparison the table below summarised the difference, in floorspace terms, between the current scheme and the proposals GVA considered.

Table 8: WLRNS Assessed Proposals for Southall Gas Works Compared to Current Proposals

Floorspace Type	WLRNS Assessed Proposal (m ² net)	Current Application Proposal (m ² net)	Difference (m ² net)
Convenience	3,331	3,510	+179
Comparison	8,675	11,360	+2,685
Total:	12,006	14,870	+2,864

4.19 As can be seen the current proposals are larger (by 2,864m²) than the scheme considered by GVA in the WLRNS. The principal increase in the scheme has been on the quantum of comparison floorspace. It has increased by 2,685m² over that contemplated by GVA in their work. Consequently, the total predicted turnover of the scheme will have increased from that predicted in the WLRNS. This is shown in the following two tables for the year 2016.

Table 9: Turnover of the Retail Floorspace at Southall Gas Works as Predicted by GVA in the WLRNS at 2016

Floorspace Type	Total Net Floorspace (m ²)	Turnover Rate (£/m ²)	Turnover £M
Convenience	3,331	12,000	39.97
Comparison	8,675	6,704	58.16
		Total:	98.13

Table 10: Turnover of the Retail Floorspace Comprised in the Current Proposals at 2016

Floorspace Type	Total Net Floorspace (m ²)	Turnover Rate (£/m ²)	Turnover £M
Convenience	3,510	12,000	42.12
Comparison	11,360	6,704	76.16
Total:			118.28

4.20 As can be seen, the total predicted turnover of the current scheme is about £20M or 20% greater than that contemplated by GVA Grimley in the WLRNS.

4.21 The WRLNS's capacity assessment allowing for the other key proposals and commitments together with the Gas Works proposal (for comparison goods) is set out in Table 23, Appendix 13 and summarised in the table below:

Table 11: Comparison Goods Floorspace Capacity: Southall Town Centre

	2006	2011	2016	2021
Total Town Centre Turnover Following all commitments (£000)	27,269	81,141	103,076	130,823
Existing shop floorspace (m ² net)	16,656	16,656	16,656	16,656
Sales per m ² net (£)	1,637	1,808	1,996	2,203
Sales from existing floorspace (£000)	27,266	30,114	33,245	36,693
Residual spending to support new shops (£000)	0	51,027	69,831	94,130
Sales per m ² in new shops (£)	5,500	6,072	6,704	7,402
Capacity for new floorspace (m ²)	0	8,404	10,416	12,717
Floorspace key proposals and commitments (m ² net)	0	8,675	8,675	8,675
Capacity for new floorspace (m² net) after proposals and commitments	-	-271	1,741	4,042

4.22 The above table demonstrates that, at 2016, even allowing for 8,675m² (net) of comparison goods floorspace at Southall Gas Works, there remains residual available expenditure to support a further 1,741m² net of floorspace. In short at 2016 the WLRNS supports some 10,416m² of comparison floorspace in Southall. This is equivalent to 92% of the current proposal's comparison floorspace. By 2021 the WLRNS shows capacity in Southall for about 12,717m² (net) of comparison floorspace. A level well in excess of the current proposals.

4.23 In many ways there is no need to go any further with this quantitative analysis. Put simply GVA, in the WLRNS, show capacity for 92% of the proposed floorspace by 2016 and more than ample capacity for all of the proposed retail floorspace by 2021. Given as we have indicated the totality of the floorspace will not come on stream until beyond 2016 the need case is made. Nevertheless, we consider GVA's work in more depth as we believe it shows in the strongest terms the absolute case for a scheme of this scale.

- 4.24 The figures in GVA’s analysis above assume that Southall’s market share for comparison goods increases by 9% in Zone 9 and 6% in Zone 10 (i.e. the zones that cover Southall town centre) between 2006 and 2011 (and thereafter remain at a constant 16% and 11% for Zones 9 and 10 respectively to 2021). This is we consider an extremely conservative estimate given the scale and nature of comparison retail floorspace proposed. In particular, the provision of national multiple retailers (particularly fashion), for which there is a recognised absence in Southall, is likely to result in higher retention rates than those assumed in the WLRNS (and therein a greater capacity for new floorspace). For example, the assumed increased retention rates for Southall compare against comparison goods retention rates of 27.1% and 25.2% for Hammersmith and Chiswick; similar order centres in the retail hierarchy. Even a slight increase over the improved retention rates assumed by WLRNS, but remaining well below those achieved by the likes of Hammersmith and Chiswick, would lead to more than enough expenditure to support the scheme.
- 4.25 Indeed, we consider that it is desirable in planning terms that Southall achieves higher retention rates than presumed in the WLRNS. If it does not it will continue to under perform against its notional position in the shopping hierarchy. This in turn leads to a lack of choice and competition in shopping and to unsustainable shopping patterns. Neither are desirable in retail planning policy terms.
- 4.26 To illustrate the consequences of improved retention rates, the table below is a reworking of Table 23 from the WLRNS, however, making the one assumption that the retention rates achieved in Zones 9 and 10 following provision of the new floorspace are each 1.5% higher than predicted by GVA. So, for Zone 9, it assumes a 17.5% retention rate from 2011 onwards and for Zone 10 a 12.5% retention rate. In other respects all of the other assumptions in GVA’s work remain identical.

Table 12: Revised Comparison Goods Floorspace Capacity (1.5% Higher Retention)

	2006	2011	2016	2021
Total Town Centre Turnover Following all commitments (£000)	27,269	84,234	107,007	135,796
Existing shop floorspace (m ² net)	16,656	16,656	16,656	16,656
Sales per m ² net (£)	1,637	1,808	1,996	2,203
Sales from existing floorspace (£000)	27,266	30,114	33,245	36,693
Residual spending to support new shops (£000)	0	54,120	73,762	99,103
Sales per m ² in new shops (£)	5,500	6,072	6,704	7,402
Capacity for new floorspace (m ²)	0	8,913	11,003	13,389
Floorspace key proposals and commitments (m ² net)	0	8,675	8,675	8,675
Capacity for new floorspace (m² net) after proposals and commitments	-	238	2,328	4,714

- 4.27 This very minor adjustment to the retention rates at 2011 and beyond for Zones 9 and 10 quickly illustrates the increased capacity that would be available to support the new floorspace. It is all but enough to support the scheme by 2016 and would be in excess of what would be required by 2017.
- 4.28 The increased retention rates we have suggested, which it should be emphasised relate solely to Zones 9 and 10 are, we believe, wholly supportable. Indeed, we consider they remain unduly pessimistic. This

is because:

- We consider GVA's base retention rates for Zones 9 and 10 to be unduly conservative at just 16% and 11% respectively. They are well below the retention rates achieved by comparable order centres from their immediate zones, for example, 25% in Chiswick.
- The proposed scheme provides a total of 11,360m² (net) of additional comparison floorspace which is 24% greater than that contemplated by GVA in their work. Realistically, therefore, the attraction of this floorspace particularly to local people will be greater than that contemplated by GVA. For the immediate zones therefore retention rates of approaching 20% are far more realistic and, indeed, desirable in planning terms.

4.29 In recognition of the second bullet point above, we have undertaken a further iteration of GVA's Table 23, again maintaining all of their assumptions save for the retention rates for comparison goods from Zones 9 and 10. The new table appears below. It assumes in line with our comments above, that within Zones 9 and 10, following provision of the proposed floorspace, retention rates of 20% for comparison goods will be achieved in both zones. This is not an unrealistic assumption. It is a retention rate which is consistent with Southall's position in the shopping hierarchy and which should be supported and encouraged if the current unsustainable shopping patterns are not to continue. In short, it is not unreasonable that Southall seeks to retain about 20% of its immediately generated (Zones 9 and 10) comparison spend.

Table 13: Revised Comparison Goods Floorspace Capacity (20% Retention)

	2006	2011	2016	2021
Total Town Centre Turnover Following all commitments (£000)	27,269	97,798	124,286	157,722
Existing shop floorspace (m ² net)	16,656	16,656	16,656	16,656
Sales per m ² net (£)	1,637	1,808	1,996	2,203
Sales from existing floorspace (£000)	27,266	30,114	33,245	36,693
Residual spending to support new shops (£000)	0	67,684	91,041	121,029
Sales per m ² in new shops (£)	5,500	6,072	6,704	7,402
Capacity for new floorspace (m ²)	0	11,147	13,580	16,351
Floorspace key proposals and commitments (m ² net)	0	8,675	8,675	8,675
Capacity for new floorspace (m² net) after proposals and commitments	-	2,472	4,905	7,676

4.30 Adopting these more realistic retention rates for Southall's core zones shows that there is ample expenditure at 2016 to support the scheme and indeed allow for further comparison growth elsewhere in Southall. At 2016 the table shows that Southall could support an additional 13,580m² (net) of new comparison floorspace. After allowing for the proposed floorspace (11,360m² net) this still leaves 2,220m² (net) of new floorspace to be provided or supportable within Southall. By 2021 this additional provision over the current proposals would rise to 4,991m² (net).

- 4.31 It is reasonable to assume that a proportion of the floorspace for the proposed foodstore would be used for the sale of comparison (rather than convenience goods). Based on information derived from Verdict (UK Grocery Retailers 2008), the average floorspace attributed to comparison goods in foodstores (for top nine food retailers) equates to 26%. Taking this average, the proposed foodstore would comprise a total of 3,510m² (net), of which, 913m² would be used for the sale of comparison goods. As outlined in Table 13 (above), there is sufficient available comparison goods expenditure to support this element of the foodstore.
- 4.32 We consider that the capacity assessment encompassed in Table 13 above represents both a realistic assessment of the proposals and a desirable outcome if Southall is to fulfil its true position in the shopping hierarchy. From Table 13 it is worth emphasising the following:
- It is derived directly from GVA's work on the WLRNS. Save for one change (explained below) it follows all of their assumptions and inputs.
 - The foundation for the WLRNS work is a household survey of 3,000 residents across 30 zones. Consistent with good practice therefore the capacity analysis is survey based.
 - The WLRNS also takes into account other known commitments such as the major proposals for new retail floorspace at White City.
 - In our Table 13 analysis the one change over and above GVA's work is that Southall achieves a higher retention rate (20%) across its two key zones (Zones 9 and 10). A retention rate of 20% across these two zones is wholly desirable and is consistent (indeed lower) than the retention rates achieved by comparable order centres across the study area.
- 4.33 Our capacity analysis shows:
- Available capacity at 2016 to support some 13,580m² (net) of new comparison floorspace. This compares against the comparison component of the proposals of 11,360m² (net).
 - By 2021 the capacity for new comparison floorspace will have increased to 16,351m² (net), some 4,991m² (net) greater than contemplated in the current proposals.
 - At 2016 even allowing for 913m² (net) of comparison floorspace in the proposed foodstore there would remain additional capacity over that required by the proposals to support some 1,307m² of new comparison floorspace elsewhere in Southall. By 2021 this additional need over and above the proposals would have increased to some 4,078m² (net) of new floorspace.
 - Even taking a worst case scenario where 40% of the foodstore's floorspace is given over to comparison goods (GLA suggested figure), there would be capacity at 2016 for an additional 816m² (net) of new floorspace over and above that contemplated in the current proposals. By 2021 that additional need would be some 3,587m² (net).
- 4.34 In short, there is a very strong and compelling quantitative need case by 2016 to support the amount of comparison floorspace proposed in the current scheme. Indeed, the quantitative need is far greater than that currently proposed amounting to over 13,500m² (net) by 2016. Failure to satisfy that need will result in direct planning harm through lack of consumer choice and continued unsustainable shopping

habits.

- 4.35 The capacity assessment for convenience goods, again allowing for proposals and commitments in Southall town centre (but excluding any convenience floorspace on the Gas Works site), is set out in Table 17, Appendix 11 of the WRLNS. This is summarised in the table below:

Table 14: Convenience Goods Floorspace Capacity: Southall Town Centre

	2006	2011	2016	2021
Residents Spending (£000)	10,058	10,669	11,374	12,084
Existing Shop Floorspace (m ² net)	7,037	7,037	7,037	7,037
Sales per m ² net (£)	1,429	3,270	3,270	3,270
Sales from Existing Floorspace (£000)	10,058	23,009	23,009	23,009
Sales from Committed Floorspace (£000)	0	0	0	0
Residual Spending to Support New Shops (£000)	0	-12,340	-11,635	10,925
Sales per m ² net in new shops (£) – based on large store format	12,000	12,000	12,000	12,000
Capacity for new floorspace (m ² net)	0	-1,028	-970	-910

- 4.36 The above demonstrates that at 2011 there is a deficit of available expenditure to support new convenience retail floorspace, i.e. there is currently an oversupply of convenience floorspace of 1,028m² (decreasing to 970m² in 2016). However, the above table is based on the assumption that Southall would retain its existing market share between 2006 and 2021 in Zones 9 and 10. Those market share rates for Zones 9 and 10 are just 10% and 12% respectively. In short, the above table presumes that in Zones 9 and 10 between 88% and 90% of the available food expenditure will go to centres and facilities beyond Southall town centre. If correct and un-remedied this would result in a highly unsustainable pattern of food shopping.
- 4.37 Should a foodstore, such as proposed, come forward on the former Gas Works site it is realistic to assume and indeed desirable that the amount of expenditure (currently lost predominantly to out-of-centre facilities; see Table 3) that is retained in Zone 9 and 10 would increase to 60% in Zone 9 and 72% in Zone 10. As recognised at paragraph 10.57 of the WLRNS, it is wholly reasonable for authorities to bring forward proposals that increase market share and, given Southall's position in the retail hierarchy, it is legitimate to look to achieve retention rates in excess of 60%.
- 4.38 On the basis of these retention rates, the capacity for additional convenience goods floorspace would be significantly greater; as set out in the Table below:-

Table 15: Revised Convenience Goods Floorspace Capacity: Southall Town Centre

	2006	2011	2016	2021
Residents Spending (£000)	10,058	60,173	64,149	68,126
Existing Shop Floorspace (m ² net)	7,037	7,037	7,037	7,037
Sales per m ² net (£)	1,429	3,270	3,270	3,270

	2006	2011	2016	2021
Sales from Existing Floorspace (£000)	10,058	23,009	23,009	23,009
Sales from Committed Floorspace (£000)	0	0	0	0
Residual Spending to Support New Shops (£000)	0	37,164	41,140	45,117
Sales per m ² net in new shops (£) – based on large store format	12,000	12,000	12,000	12,000
Capacity for new floorspace (m ² net)	0	3,097	3,428	3,759

4.39 As the above demonstrates, based on updated retention rates, there is broadly sufficient residual available expenditure at 2016 to support the proposed convenience floorspace (of 3,510m²). The above figures do not, however, make any allowance for the increase in population in Zone 10, which would be a direct result of the proposed new housing; this is dealt with below. Nor do they discount any floorspace in the proposed store that would be devoted to comparison goods.

d) Expenditure and Floorspace Requirements Generated by Proposals

4.40 To understand what demands for new floorspace the new housing alone will generate we have used data derived from the WLRNS (above). This provides estimates of per capita expenditure (derived from Experian) for convenience and comparison goods (with necessary deductions made for Special Forms of Trading). Per capita expenditure figures have been multiplied by the estimated increase in population to provide the total 'pot' of available expenditure for both comparison and convenience goods. Based on a maximum of 3,750 residential units it is estimated that the overall population of the scheme will be circa 6,500 people.

4.41 The findings of this exercise are set out in the table below:

Table 16: Requirements for New Retail Floorspace

	Comparison Goods	Convenience Goods
Expenditure per head ⁽¹⁾ at 2016 (£)	3,164	1,079
Population	6,706	6,706
Total Available Expenditure (£M)	218	7,236
Sales Density (£m ²)	7,402	12,000
Floorspace Requirement (m ²)	66	603

Notes: ⁽¹⁾Table 2 of Appendix 10 and Table 2 of Appendix 13 of WLRNS

4.42 The above further strengthens the quantitative case for the application proposals.

e) Qualitative Needs

4.43 In addition, to the clear quantitative need for the proposals, it is evident that the retail component of the proposals will meet an unambiguous qualitative need.

- 4.44 The former Gas Works proposals will deliver up to 3,750 new homes and significant employment floorspace and related community and education facilities. The population of the site once completed would be about 6,500.
- 4.45 A fundamental element of all levels of planning policy is to deliver mixed-use proposals to create variety and help reduce the need to travel. The proposals respond to this context by ensuring the various uses in the scheme are embedded with one another. The new shops are located on the lower floors of buildings which also provide housing and other uses.
- 4.46 The retail units are concentrated along the East Street to act as a focus and help define an identity for what will be a significant new community. The illustrative master plan has been developed to ensure that the new shops are convenient, attractive and successful.
- 4.47 There is already considerable evidence that residents of the Southall area are choosing to shop elsewhere. This is principally because of the very limited provision of main stream national multiples within Southall town centre itself. For example, the only high street national fashion retailer in the town is Burton. There is no Next, H&M, New Look or Primark. Similarly HMV, Boots and WH Smith are not represented. In the absence of these “names” it is not surprising people are choosing to shop elsewhere. In particular:
- The Southall Town Centre Strategy identified that existing younger residents spend more time and money in other centres on goods and services that are not available in Southall; the ‘shopping mix’ is identified as a specific weakness of the centre.
 - The household telephone survey used to inform the WLRNS demonstrates that only 5.6% of those questioned in Southall (Zone 10) shop in the town centre for fashion items (clothes, footwear, etc.), whilst 38.2% and 25.8% travel to Hounslow and Ealing respectively. This indicates that there is currently a significant outflow of shoppers and therefore expenditure.
 - Based on a review of national and London-wide trends in BME retailing, the WLRNS concluded that:

“There is potential to introduce more ‘mainstream’ multiple retailing into Southall to better serve its second and third generation residents, whilst also maintaining and improving its unique ethnic offer. For example, the survey indicated that only 1% of respondents to the in-centre survey specifically visited the centre for fashion shopping and some 3.8% identified the need for larger retailers.”
 - Over the next few years Southall will be the subject of increased competition from high quality large new shopping developments. New developments at Wembley, White City and Brent Cross are likely to exacerbate the existing outflow of shoppers from the area. Indeed, new residents could also be attracted by these new facilities.

4.48 It is perhaps unsurprising that Southall is losing expenditure to other centres given its retail offer in comparison to other Major Centres in West London. The plans at Document 2 illustrate the proportion of national multiple retailers in the Major Centres of Southall, Chiswick, Fulham (North End Road and Fulham Road) and Hammersmith. It is clear from this that Southall has significant under-representation in terms of national multiple retailers compared to other centres in the same position in the retail hierarchy.

Document 2

4.49 GOAD identify 27 national multiple retailers that are considered ‘key attractors’ i.e. those retailers most likely to improve the consumer appeal of a centre. These include, for example, Marks and Spencer, Boots, Topshop and Next. The table below again indicates the absence of these ‘key attractors’ in Southall compared to competing Major Centres in West London.

Table 17: GOAD Key Town Centre Attractors

	Southall	Chiswick	Hammersmith	Fulham ⁽¹⁾
No of identified ‘key attractors’ (as defined by GOAD)	3	13	18	20

Notes: ⁽¹⁾Includes North End Road and Fulham Road
⁽²⁾Key attractor could have multiple representation in one centre

4.50 There are a number of potential commercial reasons for the absence of national multiple retailers within Southall, as follows:

- Many of the major national retailers require a critical mass of other similar retailers before entering a market (particularly fashion retailers such as Next, Zara or New Look).
- There has been no recent significant investment in Southall and yields are higher (9.25%) compared to other competing centres in West London.
- There is absence of the modern retail floorspace within the centre that national retailers demand (for example, large unobstructed sales spaces). Comparison shopping needs are being met by fewer, larger units; as a consequence retailer requirements are generally for larger shop units than those available in Southall.

4.51 The application proposals address this qualitative deficiency, as follows:

- The illustrative master plan indicates nine larger floorplate units, with a floorspace between 756m² and 925m² (8,140ft² to 10,000ft²); these have been designed specifically to meet the requirements of modern retailers and allow for a critical mass of national retailers to become established. Without that critical mass the scheme would not be commercially attractive.
- East Street would be anchored by a large comparison unit (2,377m²) and a new modern supermarket .
- The proposals include a number of smaller unit shops that would add to the retail offer and meet the day to day needs of residents and workers (i.e. newsagents, sandwich shop, etc.).

4.52 Without the proposed investment, Southall will decline in relative terms. With major new retail development proposed or committed elsewhere in West London (for example, White City and Ealing Broadway) Southall needs to respond even to stand still. There is a danger that if new retail floorspace is not in place to complement the new homes and businesses at the former Gas Works site the new residents will regularly travel elsewhere as their shopping patterns become established.

4.53 The WLRNS (at paragraph 6.17) recognises the important role of providing larger retail units in Southall:-

“...in our judgement it would benefit from a better supply of larger shop units to attract more mainstream multiple retailers into the centre. In the absence of this more mainstream offer we consider that there will be an increased leakage of shoppers and spend to other competing centres in West London.”

4.54 The provision of modern retail floorspace that would attract national multiples would significantly improve the retail offer of Southall and assist in retaining expenditure within the town centre; this is a clear and convincing qualitative benefit of the scheme.

SECTION 5: RETAIL IMPACT

5.1 Paragraph 3.21 of PPS6 states that, in assessing sites, local planning authorities should consider the impact of the proposal on the vitality and viability of existing centres within the catchment area of the proposed development. It goes on to state that the identification of need (as demonstrated in the previous section) does not necessarily indicate that there will be no negative impact. In assessing the (then) proposals for the former Gas Works site, the WLRNS (at paragraph 28) concluded that:-

“Taking on board proposals for the Southall Gas Works site, we forecast that the scheme will have a positive impact on market share in Zone 10, although the impact of the scheme on the town centre should be reviewed in detail when proposals are finalised. This Study has reviewed the uplift of market share in Zone 10 (which comprises Southall town centre and the Gas Works site), but there could be a negative impact on the town centre depending on scheme composition and linkages. The next steps should review this carefully.”

5.2 At Table 26 of the WLRNS GVA provide a summary of their predicted impact levels assuming the various commitments they considered took place. Those commitments, as has been seen, presumed that circa 8675m² of comparison floorspace came forward in Southall, notably on the Gas Works site. For Southall town centre the WLRNS concludes the following;

Table 18: % Impact on Southall Town Centre (WLRNS)

Centre	Before 2011 No New Development £M	Total Turnover in 2011 Excluding Commitments and Including Inflow £M	Total Turnover in 2011 with Commitments Excluding £M	Inflow of Trade from Beyond Zones 1-30 (%) 2011 Following Commitments £M	Total Turnover 2011 Following Commitments and Including Inflow £M	Impact £000s	Impact %
Southall	32.5	34.6	73.3	9.0	81.1	47	+143.0

5.3 Perhaps not surprisingly the WLRNS concludes that overall the then proposals would have a positive impact, and a significant one at that, on Southall. It considered that the proposals would result in the retention of some extra £40.8M of comparison expenditure in Southall from the study area (Zones 1 to 30) and lead to the centre’s total comparison expenditure increasing at 2011 from the predicted £32.5M to a total of £81.1M; a positive impact of some 143%. In short a very real planning benefit of the proposals rather than a concern of harm.

5.4 It is against this starting point that we consider in more detail the impact of the application proposals on Southall town centre itself and any other centres of potential relevance.

5.5 At the outset it is worth emphasising that the proposed retail development, and indeed the other mixed uses proposed, are seen as and designed to be as extension or adjunct to Southall town centre. The aim is for the two to work together and to be perceived and indeed function as one shopping destination serving the needs of Southall’s residents and the immediate catchment.

5.6 The existing and proposed links between the application site and Southall town centre are explained in full in the Design and Access Statement that accompanies the application. It is worth, however, highlighting the following:

- The West Southall Masterplan incorporates strong pedestrian connections between East Street and Town Square (where the retail units are concentrated) and Beaconsfield Road. Beaconsfield Road has established and successful links to Southall town centre (particularly The Broadway) via those residential streets that run north to south.
- Southall town centre currently extends both north (South Road and The Broadway) and south (The Green and King Street) of Southall train station with high pedestrian flows between the two. The West Southall Masterplan provides strong links with South Road and in turn Southall Station. In particular, the proposals include a shared footpath/cycleway along the northern side of the bus link that passes to the north of the Water Tower and a pedestrian crossing a short distance to the east of the Water Tower. This enables pedestrians to use a more direct route to South Road along the southern side of the access road.
- The West Southall Masterplan concentrates the retail elements of the scheme to the east of the site (i.e. closest to South Road) in order to maximise connectivity to Southall's existing retail core and principal public transport node.

5.7 Despite the very strong links with Southall town centre, it is not to say that the proposed new shops will not draw some of their trade from existing retailers. They will conversely though, by attracting more people to shop in Southall, and particularly by retaining a far greater proportion of the town's actual catchment area spend (notably of Zones 9 and 10), lead to spin off spending within Southall's existing town centre shops.

5.8 Put simply, if residents of Southall's primary catchment are not leaving the area for their fashion, furniture, electrical or luxury goods spend (they currently are) then they are all the more likely to undertake other purchases and use existing services within Southall town centre, be it food shopping, comparison shopping or using local services such as cafes, banks, restaurants, etc.

5.9 Having set the context for any consideration of impact we next turn to the detailed advice of PPS6 on the matter. Paragraph 3.22 establishes a series of factors that should be taken into account by Local Planning Authorities when considering the impact of a development on a centre; these are dealt with in turn below.

- a) **The extent to which the development would put at risk the spatial planning strategy for the area and the strategy for a particular centre or network of centres, or alter its role in the hierarchy of centres.**

5.10 Southall is identified as a Major Centre in the London Plan; the table below compares the floorspace (both comparison and convenience), turnover, national rank and yields of the Major Centres of Hammersmith, Chiswick and Fulham in West London against Southall; it demonstrates that Southall,

although comparable in size, is the poorest performing centre in the Sub-Region by a significant margin.

Table 19: Comparison of Major Centres in West London

	Southall	Hammersmith	Chiswick	Fulham
Floorspace (sqm gross)	55,846	59,080	57,566	40,250
Turnover £M	27.3	227.1	114.5	98.3
National Rank	1,528 th	149 th	263 rd	764 th
% Yield (2006)	9.25%	9%	7%	9%

Source: WLRNS

- 5.11 Shopping Policy 7.1 of the Ealing UDP seeks to ‘*maintain, and where necessary improve the function, character, vitality and viability of the existing shopping hierarchy.*’ The application proposals would help Southall to improve its relative position compared to other Major Centres in the Sub-Region through improving its range of offer and thereby function; this is entirely consistent with the UDP objective. The proposed quantum of retail floorspace would not elevate the position of Southall town centre above those currently at the same level in the retail hierarchy.
- 5.12 The Ealing LDF ‘Strategy and Sites’ document, published in September of last year, identifies three different scenarios for the future of Southall; this includes the option to identify the former Gas Works for ‘new retail’ development, as part of a wider mixed use scheme and to extend the town centre boundary to include part of the site. The application proposals are, therefore, consistent with the emerging spatial planning strategy for the centre.
- b) The likely effect on future public or private sector investment needed to safeguard the vitality and viability of the centre or centres.**
- 5.13 One of the main weaknesses of Southall town centre (as identified in the Southall Town Centre Strategy) is the lack of investment by quality retailers and investor confidence; this is in part reflected by the yields in Southall, which are poorer than the other Major Centres in the Sub-Region.
- 5.14 The application proposals would very clearly have a significant effect in terms of improving investor confidence in the town. A critical mass of retail floorspace is required to attract the national retailers (particularly fashion) who will drive that investor confidence; without a step change in the retail offer in Southall investor confidence will remain weak (and as a consequence the town centre will slip further compared to competing centres).
- c) The likely impact of the proposed development on trade/turnover and on the vitality and viability of existing centres within the catchment area of the proposed development and, where applicable, on the rural economy (an example of a positive impact might be if development results in clawback of expenditure from the surrounding area).**
- 5.15 The WLRNS identifies, at paragraph 6.17, that overall Southall is a ‘*healthy and viable centre, with a strong ethnic retail offer serving both its local catchment and attracting residents from across West*

London and beyond. ‘ The WLRNS undertook a full health check of Southall town centre, based on the vitality and viability indicators set out in PPS6. In summary it concluded:-

- Southall’s vacancy rate is 5.5%; this is low compared to the national average of 10.93% (Source: GOAD).
- Independent retailers dominate the retail offer in Southall.
- Rents have been rising since 2001 and have almost doubled in the last five years; yields have remained constant since 2004.
- Southall has a strong demand from a range of convenience, comparison and service operators.
- Popular improvements in Southall would include larger retailers (38% of respondents), cleaner shopping streets (11%), improved policing and security measures (10%), more parking spaces (7%) and less overcrowding (5%).

5.16 As explained in Section 3 of this Statement, the Southall Town Centre Strategy identifies a number of weaknesses and threats that need to be addressed, namely:-

- Shopping and service mix.
- Lack of investment by quality retailers/offices.
- Limited sports/leisure and community facilities.
- Lack of media/arts facilities.
- Perception of investors is poor due to quality of environment.
- Other centres are expanding.
- Contamination issue at British Gas site.
- Further loss of business to neighbouring town centres.

5.17 The application proposals will specifically address a number of these weaknesses/threats; they will significantly improve the shopping mix through the introduction of national multiple retailers, who are currently under-represented within Southall and for which there is a recognised requirement (WLRNS, paragraph 6.17). Further, the presence of national multiples can greatly enhance the appeal of a centre to consumers and therein investors; this would be to the benefit of the town centre as a whole.

5.18 Further, the former Gas Works site will be developed as a genuinely mixed-use scheme incorporating leisure uses, community, education and health facilities as well as employment floorspace and housing. It will improve the service mix, the quality of the environment and the range of leisure/community facilities, all to the benefit of the wider town centre and community.

5.19 Finally, as set out above, the proposals would help to retain expenditure within the centre that is currently being lost to competing centres (such as Hounslow, Ealing and Kingston) and out-of-centre retail warehousing. This must be to the benefit of the vitality and viability of Southall town centre, particularly as proposed or committed retail schemes come forward elsewhere in West London. PPS6 explicitly recognises that clawback of expenditure from the surrounding area can be a positive impact of

a development.

5.20 As has already been explained Southall town centre does not currently retain high percentages of the available spend for either convenience goods or comparison goods from its immediate catchment area (WLRNS Zones 10 and 9). For example, as seen in earlier paragraphs, it has the following retention rates from those zones for the following categories of goods:

Table 20: Retention Rates for Zones 10 and 9

Goods Category	Retention Rate from Zone 10	Retention Rate from Zone 9
Convenience Goods	3.3%	7.6%
Fashion & Clothing	5.6%	2.4%
Furniture, Carpets & Household Textiles	14.6%	15.7%
Personal & Luxury Goods	6.5%	9.6%

5.21 Conversely, significant amounts of expenditure from these two zones are leaving the area either to competing centres or, in the case of food shopping in particular, to out of centre freestanding stores. For example, the following centres or stores attract expenditure from Zones 10 and 9 in the following amounts:

Table 21: Attraction to Competing Centres/Out of Centre Stores

Centre or Stores	Fashion Clothing		Furniture, Carpets Household/Textiles		Personal/Luxury Goods	
	Zone 10	Zone 9	Zone 10	Zone 9	Zone 10	Zone 9
Ealing	25.8	29.8	10.4	17.6	24.2	30.8
Uxbridge	11.2	17.9	4.2	7.8	9.7	11.5
Hounslow	38.2	7.1	10.4	0	33.9	5.8
West End	4.5	6.0	0	5.9	6.5	1.9
Harrow	0	8.3	4.2	3.9	0	0
Greenford	2.2	9.5	0	3.9	1.6	25.0
IKEA Brent Cross	0	0	10.4	17.6	0	0

5.22 On the basis of these results it is clear that the proposed floorspace will draw the bulk of its trade from these competing centres and stores. Based on existing shopping habits we predict that just 5% of the proposal's comparison turnover will be drawn from existing Southall town centre comparison retailers. For convenience retailing we predict that the proposal will draw just 2.5% from Southall's town centre retailers. This lower percentage draw reflects the specialist nature of Southall's town centre food shops and the strong dominance of out of centre food stores such as the Tesco stores at Hayes and Yeading (each attract over 30% of either Zone 9 or Zone 10's main food spend).

5.23 These percentage draw rates are judgements on our part however they are informed by the existing shopping habits of those residents who live closest to Southall town centre and who are therefore most likely to switch their shopping habits from Southall town centre to the proposal. The four zones of the WLRNS closest to Southall town centre are Zone 10 (Southall town centre falls within it) and Zone 9 together with Zone 6 to the east and Zone 25 to the west.

5.24 The WLRNS asked residents a series of questions about where they undertook various shopping purchases. The table below shows for each of those goods categories the percentage of residents of the four zones who identified Southall town centre as the main location where they purchased those items. In short it shows amongst those closest residents, what percentage are choosing Southall town centre for various shopping purchases. It is these people who are more likely to divert. Indeed, across most other zones Southall town centre does not feature as a most likely shopping destination.

Table 22: % Respondents Undertaking Main Shopping Trip in Southall Town Centre – Source Household Questionnaire

Question	Zone 10	Zone 9	Zone 6	Zone 25
Where do you do most shopping for clothes, footwear and fashion goods.	5.6	2.4	0	2.3
Where do you do most shopping for furniture floor coverings, household textiles.	14.6	15.7	0	1.6
Where do you do most shopping for DIY and decorating.	1.3	1.3	0	1.3
Where do you do most shopping for domestic appliances.	0	7.1	2.7	2.5
Where do you do most shopping for TV, hi-fi, radio, photographic and computers.	1.6	8.7	0	1.3
Where do you do most CDs, DVD's, books, jewellery, china and glass.	6.5	9.6	0	3.1
Where do you do most shopping recreational goods.	6.3	3.1	2.0	4.5
Where do you do, your households' main food shop.	3.3	7.6	0	0
Where do you do your households' top-up food shopping.	38.4	16.6	0	0
Average	5.1%	6.8%	0.67%	2.4%

5.25 It will be seen that even for Zone 10 the largest percentage of people identifying Southall town centre as their most visited location (in this instance for furniture, floor coverings and household textiles) is just 14.6%. For the other categories of goods the responses range from 0% to 6.5% for Zone 10. Overall the mean of these responses is 5.1%.

5.26 The table also includes the responses for Zones 9, 6 and 25. Again, it will be seen that the percentage visitation rates across those three zones range from 0% to 15.7% (again for furniture and floor coverings) with the mean for each zone being 6.8%, 0.67% and 2.4%. It is these established shopping patterns that have been used to establish the likely draw rate of the proposals from Southall town centre.

5.27 Based on the total turnover of the proposal of circa £118M, which comprises £76M comparison spend and £42M convenience spend (see paragraph 4.19) this equates to a total draw from Southall town centre of approximately £4.85M. The table below illustrates what this level of trade draw from the town centre would equate to in impact terms. The turnover levels for Southall town centre are the baseline levels predicted in Appendices 10 and 13 of the WLRNS.

Table 23: Impact on Southall Town Centre

Baseline Convenience Turnover of Southall Town Centre at 2016 £M Table 12	Baseline Comparison Turnover of Southall Town Centre at 2016 £M	Inflow from Beyond Survey Area at 2016 £M Table 12	Total Baseline Turnover of Southall Town Centre at 2016 £M	Turnover Drawn from Southall Town Centre to the Proposed Floorspace £M	Revised Turnover of Southall Town Centre at 2016 £M	% Impact
11.374	41.297	2.636	55.307	4.85	50.457	8.7%

5.28 In fact the actual impact level of the proposals on Southall town centre would be less than the 8.7% suggested in the table above. This is because first, the level of inflow to Southall town centre from beyond the catchment area (6% in the above table) is likely to increase over and above its current level. Indeed, the WLRNS itself predicts it will rise from 6% to 9%. We believe, given the increased draw of these proposals, it may be higher. Secondly, the above analysis does not allow for any increased spend in Southall town centre from residents of the study area. We have merely assumed that the proposal will draw some expenditure (£4.85M) from Southall town centre's existing turnover without there being any compensatory spin off from more local residents choosing to shop in Southall in conjunction with visits to the proposal. Given their close inter-relationship this is wholly unrealistic. Indeed it is a direct objective of the proposals to improve retention rates with the spin-off benefits this will deliver to existing town centre businesses be they shops, cafes or restaurants.

5.29 The WLRNS next goes on to consider from where the proposed floorspace for Southall would draw its trade. This work is encapsulated in Tables 4, 5, 15 and 16 of Appendix 13. Those tables show both the % draw and the actual money drawn to Southall both pre and post the then Gas Works commitment. They are instructive when considering impact on centres beyond Southall itself. Indeed, this was exactly part of GVA's brief as explained at paragraphs 11.14 and 11.15 of their report.

5.30 The table below draws together the information in the above tables to show from which zones and by how much the WLRNS predicted new trade would be drawn to Southall as a result of the proposed floorspace.

Table 24: Trade Draw to Southall Town Centre at 2016 from WLRNS

Zone	Main Shopping Centres in that Zone	% Draw to Southall Town Centre before Committed Floorspace %	Actual Spend to Southall Town Centre before Committed Floorspace £M	% Draw to Southall Town Centre Post Committed Floorspace %	Actual Spend to Southall Town Centre Post Committed Floorspace £M	Increase Spend in Southall from Zone Attributed to New Floorspace £M
6	Hanwell	0	0.823	1	1.538	0.715
8	Northolt	1	1.826	3	4.550	2.724
9	-	7	7.103	16	16.898	9.795
10	Southall Dormer's Wells	6	9.273	11	19.190	9.917
11	Cranford	1	1.507	3	3.877	2.307
12	East Bedfont	4	3.612	10	9.295	5.683

Zone	Main Shopping Centres in that Zone	% Draw to Southall Town Centre before Committed Floorspace %	Actual Spend to Southall Town Centre before Committed Floorspace £M	% Draw to Southall Town Centre Post Committed Floorspace %	Actual Spend to Southall Town Centre Post Committed Floorspace £M	Increase Spend in Southall from Zone Attributed to New Floorspace £M
14	Hounslow Heston Lampton	1	1.538	1	2.135	0.597
15	Isleworth Woodlands Spring Grove Osterley	1	1.235	1	1.569	0.334
24	Harlington	2	1.724	5	4.436	2.712
25	Hayes, Hayes End, Yeading	2	5.680	6	14.618	8.938

5.31 As would be expected the WLRNS predicted that the greatest draw to the proposed floorspace would be from Zones 9 and 10; that is the principal zones any floorspace on the site will look to serve. Beyond this immediate catchment area the zones from which expenditure would next be attracted were, in order, Zone 25, Zone 12, Zone 8 and Zone 24. It is important to recognise that the pattern of shopping predicted in the WLRNS post the Gas Works development takes on board the other commitment's GVA had been asked to look at. In short it looks at the cumulative impact of all commitments.

5.32 We have used GVA's work in the WLRNS to consider how and from where the current proposal will draw the bulk of its trade. This analysis is encapsulated in the table (Table 25) at Document 3. Within this table we have assumed that the current proposal and indeed the other commitments will continue to attract trade in exactly the same proportions as predicted in the WLRNS. This is a reasonable assumption as whilst the current proposal is larger than the proposal considered in the WLRNS, it is not so dissimilar that it is likely to result in fundamentally altered shopping patterns.

Document 3

5.33 The final column in Table 25 shows the total amount of money that will be drawn to Southall following the completion of the new floorspace and the other commitments considered in the WLRNS. For robustness, we have taken 2016 as the assessment year although in practice some of the retail floorspace will not come on stream until beyond this date. The penultimate column shows the actual increased amount of money that will be attracted to Southall (ie. over baseline) as a result of the scheme. It is, in short, the expenditure drawn to the scheme from each of the respective zones. It follows exactly the WLRNS's assumptions save, in order to reflect the total increased turnover of the proposal, the amount drawn has been increased by 25% over that predicted in the WLRNS (the WLRNS figure is in the preceding column).

5.34 From Table 25 it will be seen that the proposal will draw the greatest proportion of its trade from Zones 9 and 10. The amounts are £12.24M and £12.40M respectively. The next most popular zone from which it will draw trade is Zone 25, from which it attracts £11.17M. Thereafter and in order it draws the next most from Zones 12, 29 and 7.

5.35 Across all zones, as can be seen in the table, it is predicted that the scheme will draw about £65M (comparison spend) from the catchment area. This equates to around 85% of the proposal's comparison goods draw.

5.36 In terms of actual retail impact on the various centres across the catchment the penultimate column of Table 25 is the most significant. It shows the amount the proposal will draw from each of the respective zones. For those zones where more than £3M will be drawn (listed above) we set out in the table below the total amount drawn and our analysis of how this quantum of money translates into an impact level on the relevant centres in those zones. We have omitted the information for Zone 29 as it is simply not credible to suggest the current proposals should be resisted on the basis of any perceived impact on the Kings Road, Chelsea or South Kensington. This is not to say that they will not recapture expenditure going there, merely they are highly viable centres, of international repute, and well placed to withstand any impact. We have also included the data from Zones 5 and 14 which include Ealing and Hounslow, the closest Metropolitan Centres to Southall. Finally, we have looked at Zone 6, which includes Hanwell in direct response to comments from the London Borough of Ealing.

Table 26: Impact Levels on Nearby Centres

Zone	Expenditure Drawn to the Proposal from the Zone £M	Centres within the Zone	% of Zonal Total drawn from Centre	Amount of Zonal Total from Centre	Comparison Turnover of the Centre £M 2016	Impact Level %
25	11.172	Hayes	17	1.90	44.1	4.3
		Yeading	1	0.11	4.56	2.4
12	7.104	Bedfont	1	0.07	5.89	1.2
8	3.405	Northolt	2.5	0.08	2.91	2.7
24	3.390	Harlington	1	0.03	3.56	0.84
6	0.894	Hanwell	10	0.09	21.43	0.42
5	1.659	Ealing	100	1.66	677	0.25
14	0.746	Hounslow	100	0.75	323	0.23

5.37 Within the above table the comparison turnover levels for each of the respective centres have been derived by applying the WLRNS's average 2016 turnover rate to the net comparison floorspace of each centre. Those floorspace figures are again derived from either the WLRNS or where not available from Experian. The percentage draw rates (fourth column) for each centre are informed by the results of the WLRNS across a range of comparison goods main shopping purchases (clothing, furniture, DIY, china, etc). So, for example, the WLRNS household survey shows that about 15% of Zone 25 residents chose Hayes as their main destination for DIY shopping and about 11% for clothes shopping.

5.38 The resulting impact figures appear in the final column. They are just for comparison goods. As the table shows the greatest impact is likely to fall on Hayes town centre. Given its proximity to Southall this is not surprising. This said the predicted impact level is just 4.3%. This is not a level that would give cause for concern. Notwithstanding this, a town centre health check for Hayes (see Document 4) demonstrates that the district centre performs well as a local shopping destination offering a predominantly convenience or independent retail offer, it is viable and vital and would be able to withstand the small predicted impact.

Document 4

- 5.39 The London Boroughs of Ealing and Hillingdon have specifically asked us to consider the potential impact on Hanwell town centre. It is the closest centre within Ealing Borough to the application proposals. It falls in Zone 6.
- 5.40 From our Table 26 it will be seen that the predicted impact on Hanwell town centre is just 0.42%. This is not a level that should given any cause for concern whatsoever. Notwithstanding this, again, a town centre health check has been undertaken (Document 4).
- 5.41 The impact level on Hanwell may appear lower than initial thoughts might suggest. However, the simple fact is that Hanwell does not feature as a key destination for comparison shopping either for residents of its host zone (Zone 6) or for residents of the adjacent zones closest to Southall (Zones 9 and 10). Put simply these residents are not currently choosing Hanwell for their comparison spend (they are going to the likes of Ealing, Hounslow or further afield). Consequently, the extent to which people will divert from using Hanwell town centre is small and hence the corresponding low impact figures.
- 5.42 The table below illustrates the very limited extent to which residents of Zones 6, 9 and 10 are choosing Hanwell for their main comparison goods spend.

Table 27: % Respondents Undertaking Main Shopping Trip in Hanwell Town Centre – Source Household Questionnaire

Question	Zone 6	Zone 9	Zone 10
Where do you do most shopping for clothes, footwear and fashion goods.	0	0	0
Where do you do most shopping for furniture floor coverings, household textiles.	1.5	0	0
Where do you do most shopping for DIY and decorating.	11.7	0	0
Where do you do most shopping for domestic appliances.	4	0	0
Where do you do most shopping for TV, hi-fi, radio, photographic and computers.	3	0	0
Where do you do most CDs, DVD's, books, jewellery, china and glass.	0	0	0
Where do you do most shopping recreational goods.	0	0	0

- 5.43 The other predicted impacts range from 2.7% to 0.20%. In fact the figures for Ealing and Hounslow over emphasise the impact since we have assumed all of their respective zone's contribution (i.e. 100%) will be taken from the two centres. Whilst the actual percentage will be high it is unlikely to be 100%. Either way none of the predicted impacts are of concern.
- 5.44 Uxbridge falls outside of the WLRNS study zone, however, is an important shopping destination for Southall's residents. We have therefore been asked to consider potential impact on that centre. Table 26 below shows for the same seven categories of comparison goods used in Table 22 the relative attractiveness to residents of Zones 9, 10, 6 and 25 (ie. the very immediate catchment to Southall) of Ealing, Hounslow and Uxbridge.

Table 28: Comparative Attractiveness of Ealing, Hounslow and Uxbridge for Residents of Zones 9, 10, 6 and 25

Question	Zone 9			Zone 10			Zone 6			Zone 25		
	Ealing	Hounslow	Uxbridge	Ealing	Hounslow	Uxbridge	Ealing	Hounslow	Uxbridge	Ealing	Hounslow	Uxbridge
Where do you do most shopping for clothes, footwear and fashion goods.	29.8	7.1	17.9	25.8	38.2	11.2	61.6	1.2	2.3	1.2	1.2	69.8
Where do you do most shopping for furniture floor coverings, household textiles.	17.6	0	7.8	10.4	10.4	4.2	21.5	0	0	0	1.6	22.6
Where do you do most shopping for DIY and decorating.	1.3	0	2.6	5.3	5.3	0	11.7	0	0	0	0	3.9
Where do you do most shopping for domestic appliances.	7.1	0	3.6	6.0	3.0	1.5	32.0	1.3	0	0	0	3.7
Where do you do most shopping for TV, hi-fi, radio, photographic and computers.	10.1	1.4	2.9	9.4	10.9	1.6	40.9	1.5	0	0	0	3.9
Where do you do most CDs, DVD's, books, jewellery, china and glass.	30.8	5.8	11.5	24.2	33.9	9.7	69.8	0	0	4.7	0	46.9
Where do you do most shopping recreational goods.	12.5	3.1	15.6	18.8	20.8	2.1	51.0	0	0	2.4	0	19.5

Source: WLRNS Study

- 5.45 Broadly, what it shows is that for Zones 9 and 10 Uxbridge is a more popular shopping destination than Hounslow but less popular than Ealing. It falls roughly mid way in attractiveness between the two. The table also shows that for Zone 25 (the zone between Southall and Uxbridge) the attraction of Uxbridge is comparable to the attraction of Ealing to Zone 6 residents (the zone between Southall and Ealing). From this we have concluded that it is reasonable to assume the trade diversion from Uxbridge will be comparable to that from Ealing. This in fact is a robust assumption since Ealing is the stronger centre across Zones 9 and 10. Our impact figure is therefore likely to be an over estimate.
- 5.46 Uxbridge, from the Experian Goad Report of 2007 has a total comparison goods floorspace of circa 35,903m² (net). Again applying the WLRNS average turnover rate would suggest it has a total comparison turnover of about £240M. Assuming a similar diversion from Uxbridge to that predicted by WLRNS for Ealing would suggest the proposals would have an impact on Uxbridge town centre of about 0.7%. A level clearly not sufficient to cause concern. Again, a town centre health check for Uxbridge has been undertaken (see Document 4).

d) Changes to the range of services provided by centre that could be affected.

- 5.47 The application proposals would have a positive impact on the range of services provided by the centre, particularly in terms of improving Southall's retailer offer; they would be complementary to the existing

facilities.

e) Likely impact on the number of vacant properties in the primary shopping area

5.48 As outlined above, there are comparatively very few vacant retail units within Southall town centre; 5.5% vacancy compared to the national average of 10.93% (derived from the WLRNS). Research undertaken by GOAD in December 2006 reports a marginally lower vacancy rate of only 4.13%. This level of vacancy is to be expected in a town centre the size of Southall and is likely to represent a natural turnover of independent retailers. For the reasons set out elsewhere, the proposals are designed to attract national multiple retailers rather than independents well represented in Southall town centre; there would, therefore, be no significant impact on vacancies in the primary shopping area.

f) Potential changes to the quality, attractiveness, physical condition and character of the centre or centres and to its role in the economic and social life of the community.

5.49 The application proposals have been designed to promote the idea of a new local centre in which the new and existing community would benefit from a full range of local services, commercial, business, educational, civic and recreational uses, with facilities available for all ages. Through this approach, and by using high quality open space and urban design, a sustainable community and responsive environment can be established. It will have a positive impact on the visual appearance of the site (and wider image of Southall), as well as contributing to the economic and social life of the community.

5.50 Overall, therefore, we conclude that consistent with the work carried out for the WLRNS the levels of impact that would potentially fall on Southall and the other identified retail centres as a result of the proposed new retail floorspace would not give rise to any planning harm such that consent could reasonably be refused. On the contrary the proposals will deliver real and tangible planning benefits in terms of an enhanced retail offer consistent with Southall's position in the retail hierarchy, choice and competition in shopping and more sustainable shopping patterns.

SECTION 6: SCALE & THE SEQUENTIAL ASSESSMENT

a) Scale

6.1 Paragraph 2.41 of PPS6 establishes that the scale of a development should relate to the role and function of the centre within the wider hierarchy and the catchment served. It goes on to state that:

“The aim should be to locate the appropriate type and scale of development in the right type of centre, to ensure that it fits into that centre and that it complements its role and function.”

6.2 Southall is identified as a Major Centre in the London Plan, alongside the competing Major Centres of Hounslow, Chiswick and Fulham within West London. The table below illustrates the relative position of Southall (with and without the proposed floorspace), compared to these centres, in terms of total retail floorspace:

Table 29: Comparative Size of West London Major Centres

Centre	Retail Floorspace (m ² gross)
Southall	55,846 (75,846)
Hammersmith	59,080
Fulham	40,250
Chiswick	57,566

6.3 The London Plan defines Major Centres as:

“Typically smaller in scale and closer together than those in the metropolitan category. Their attractiveness for retailing is derived from a mix of both comparison and convenience shopping. Some major centres, which have developed sizeable catchment areas, also have some leisure and entertainment functions. Major centres normally have over 50,000m² of retail floorspace.”

6.4 Although the quantum of floorspace for Southall (with the proposals) would be greater than those competing West London Major Centres, it is worth reiterating that Southall currently under performs relative to its role in the West London retail hierarchy. In particular:

- The predicted 2011 turnover of retail floorspace in Southall (£35M) is extremely low, compared to Hammersmith (£295M); Chiswick (£114M); and Fulham (£128M) (Source: WLRNS Table 26). Even Fulham, which has 28% less retail floorspace than Southall, has a £93M high turnover.

- Southall lacks 'key attractors' such as M&S, Boots and Next, who are well represented in other West London Major Centres. For example, Fulham includes 20 national multiple retailers identified by GOAD as 'key attractors', compared to Southall which includes representation by only three. This is reflected in Southall's market share for clothes, footwear and other fashion items, which is particularly low (5.6%).
- Although remaining constant since 2004, yields in Southall are high (9.25%), compared to Hammersmith (9%), Fulham (9%) and Chiswick (7%).

6.5 As explained in the preceding sections of this Report, the application will result in a 'seed change' in Southall, providing a quantum and type of retail floorspace that will attract the national multiple retailers that are so obviously lacking.

6.6 In order to trade successfully against competing centres in West London, the retail element at West Southall needs to be of a certain scale to achieve the right critical mass. As part of the design process, there have been various iterations (and quantum) of retail floorspace (see Document 5); the retail provision has reduced as part of this process from 29,029m² to the 20,050m² that is currently proposed. This flexibility has, in part, been driven by layout requirements and, in part, by commercial retail advice.

Document 5

6.7 The advice from retail agents (DTZ), based on experience elsewhere and particularly the success of the recently completed town centre scheme in Feltham (see layout, enclosed as Document 6), which is a comparable scale, is that the quantum of floorspace proposed would achieve the required critical mass. It would be of a sufficient quantum to trade well against other centres, but would not elevate Southall above its position in the retail hierarchy. A significantly reduced quantum of floorspace at Southall would not achieve this critical mass and the scheme would not be commercially viable.

Document 6

6.8 The type and scale of development proposed is therefore consistent with Southall's position in the retail hierarchy. In fact, it would ensure Southall fulfils its role as a Major Centre and would stop it declining further in relative terms.

b) The Sequential Assessment

6.9 PPS6 is clear that the sequential approach to site selection should be applied to all development proposals for sites that are not in an existing centre nor allocated in an up-to-date development plan document. The Gas Works site is an edge of centre location and therefore this section deals with the sequential approach that was adopted in appraising potential sequentially preferable development sites.

6.10 Paragraph 3.15 of PPS6 explains that in applying the sequential approach, developers should be able to demonstrate that in seeking to find a site in (or on the edge of) existing centres they have been flexible about their proposed business model in terms of:

- The scale of their development;
 - The format of their development;
 - Car parking provision; and
 - The scope for disaggregation.
- 6.11 PPS6, at paragraph 3.16, goes on to confirm that the purpose of this exercise is to explore the possibility of enabling the development to fit onto more central sites by reducing the footprint of the proposal. It recognises, however, that local planning authorities should be realistic in considering whether sites are suitable, viable and available.
- 6.12 As part of the sequential approach, it is also necessary to explore whether specific parts of a development could be operated from separate, sequentially preferable, sites. For example, for retail proposals in an edge of centre location which comprise a group of retail units, the applicant should consider the degree to which the constituent units within the proposal could be accommodated on more centrally located sites (paragraph 3.17).
- 6.13 As outlined above, there is a requirement for a critical mass of retail floorspace to be achieved at Southall for the scheme to be a commercially viable proposition (in terms of its ability to trade successfully and compete with comparable centres). That critical mass (in terms of attracting tenants) can only be achieved with an anchor tenant, such as the foodstore proposed. This anchor needs to be of a certain size in order to draw trade from existing (predominantly out of centre) foodstores. It needs to be more than just a supermarket for local residents, in order to generate weekly or bi-weekly trips from a wider catchment which will provide the level of footfall required to support the other (comparison) units.
- 6.14 As outlined in the preceding section of this report, the number of vacant units in Southall is low (well below the national average). A recent survey undertaken by RPS (in August 2008) identified a total of 15 vacant units within Southall town centre, all of which (save for that site included in the main sequential appraisal) comprise small unit shops. Such units, which are appropriately likely to attract small independent retailers are not suitable for the type of retailers that would be attracted to the Southall Gas Works site. We say this for the following reasons:
- There is no sufficient existing 'anchor' in Southall, for example, a department store or foodstore, that would give the retailers sufficient confidence to the levels of footfall;
 - The majority of existing vacant units are only c.140-160m², which are too small for major fashion retailers. By way of example, Next, New Look and the Arcadia fascias have a requirement for a standard unit of 929-1,394m² (10,000-15,000ft²). Such, floorspace is not available in Southall town centre even if vacant units could be amalgamated (the total vacant floorspace as surveyed by GOAD in December 2006, was only c.2,323m²).
 - There is no critical mass of fashion retailers, which would act as a draw for shoppers. Again, this results in a lack of retailer confidence in a centre.

6.15 Notwithstanding the above, a total of 23 sites within, or on the edge of, Southall town centre have been assessed. These include those sites identified for development in the adopted UDP and emerging LDF, as well as vacant sites with more than limited redevelopment potential (see comments regarding vacancies below). In accordance with paragraph 3.19 of PPS6, the sites have been assessed on the basis of:

- **Availability** – whether the sites are available now or likely to become available for development within a reasonable period of time;
- **Suitability** – having regard to the requirements to demonstrate flexibility; and
- **Viability** – whether the development would be viable on the site.

6.16 For each of the potential sites identified, an appraisal sheet has been produced which appears as Document 7. From this detailed assessment it is considered that there are no sites that can genuinely be considered to be an available, suitable or viable alternative to the application site.

Document 7

SECTION 7: LEISURE ASSESSMENT

- 7.1 The West Southall Masterplan incorporates a 4,651m² (gross) multi-screen cinema which would be located at the eastern end of East Street. A cinema is a main town centre use for the purposes of PPS6 and it is therefore appropriate to assess this element of the scheme in the context of that policy guidance.
- 7.2 One of the objectives of the WLRNS was to identify the scale and nature of leisure provision that may be appropriate in West London to the period 2021. This included a qualitative and quantitative review of all existing commercial leisure provision within the three West London Authorities (of Ealing, Hammersmith and Fulham, and Hounslow). In particular, this work looked at the following:
- National trends in the leisure market;
 - Detailed qualitative health checks and site visits, to establish the distribution and quality of existing provision;
 - An assessment (and illustration) of the distribution of leisure provision, based on five minute drive times and walk-in radius plans, to provide an indication of gaps and travel distances between facilities;
 - An analysis of the household telephone survey, to understand where people undertake their leisure activities;
 - A summary of the overall growth in available leisure expenditure; and
 - A more detailed quantitative analysis, to establish how many new cinema screens could be supported.
- 7.3 The household telephone survey undertaken as part of the WLRNS identified 1,755 people (out of 3,000 asked) within the West London catchment area who visit cinemas. The table below (Table 12.1 of the WLRNS) identifies the relative market share of cinemas in the West London region.

Table 27: Most Dominant Cinema Destinations in West London

Cinema	Borough	No. of Screens	Market Share
Cineworld, Feltham	Hounslow	14	16.4%
Vue, Park Royal	Ealing	9	9.9%
Odeon, Richmond	Beyond Study Area	3	9.7%
Odeon, Uxbridge	Beyond Study Area	9	6.0%
Vue, Shepherds Bush	Hammersmith & Fulham	12	5.2%
Empire, Ealing	Ealing	3	4.9%
Vue, Fulham Broadway	Hammersmith & Fulham	6	4.8%
Vue, Staines	Beyond Study Area	10	4.6%
Vue, Harrow	Beyond Study Area	9	4.1%
UGC, Hammersmith	Hammersmith & Fulham	4	3.7%

- 7.4 As the above clearly demonstrates, the 14 screen Cineworld cinema in Feltham has the strongest influence in West London, attracting 16.4% of respondents.
- 7.5 Of those respondents questioned who lived in Zones 9 and 10 (Southall town centre and adjacent area), 49% and 57% respectively visited the cinema as a leisure activity. The following table, derived from the responses to Q21 of the WLRNS Household Survey, establishes which cinema those respondents most often visit.

Table 28: Cinema Use Patterns

Cinema	Zone 9	Zone 10
Feltham, Cineworld	18.54%	26.3%
Park Royal, Vue	22.4%	17.5%
Uxbridge, Odeon	22.4%	10.5%
Ealing, Cineworld/UCG	14.3%	17.5%
Fulham Broadway, Vue	0%	1.8%
Harrow, Vue	0%	1.8%
Other	-	8.8%
Southall, Himalaya Palace	6.1%	10.5%
Brentford	0%	1.8%
Don't Know	6.1%	3.5%

Source: Q21 of WLRNS

- 7.6 As evident from the above, (and consistent with the general trend for West London) the greatest proportion of residents of Zone 10 travel to Feltham to the cinema, whilst Zone 9 residents are more evenly split between those cinemas in Feltham, Park Royal and Uxbridge. Only 6.1% and 10.5% of Zone 9 and Zone 10 residents respectively use The Himalayan Palace cinema in Southall town centre; this may well be an indication of its specialist nature (showing only Bollywood films).
- 7.7 Paragraph 12.10 of the WLRNS recognises the 'gap' in cinema provision in Ealing Borough, commenting that:

“In Zone 7, 8, 9, and 10, however, residents are having to travel further afield to cinemas which are not local to them. In zones 7 and 8 a large proportion are travelling to the Vue cinema in Harrow, while those in zones 9 and 10 are having to travel unsustainable distances to alternative destinations. For example, residents in zone 9 are travelling to Cineworld in Feltham (18%), Vue at Park Royal (22%), Odeon, Uxbridge (22%), and the Empire cinema in Ealing (14%). Residents in zone 10 are travelling to the Cineworld in Feltham (26%), Vue at Park Royal (17%), the Odeon in Uxbridge (10%) and the Empire cinema in Ealing (17%).”

- 7.8 Paragraph 12.11 goes on to conclude that:

“We also consider there is a qualitative gap in provision in the west of the borough within zones 9-10, although given the major multiplex in Acton, the Bollywood cinema in Southall and a committed 16 screen in Ealing, we consider only a smaller mainstream cinema (circa 6 screens) could be supported.”

- 7.9 The proposals for a cinema on the Gas Works site would meet this identified requirement. Although it is recognised, that there is an existing three screen cinema within Southall town centre (The Himalaya Palace) this only shows Bollywood films and therefore residents of Southall are forced to travel to the likes of Ealing and Feltham should they wish to view a mainstream/Hollywood film. This gap in provision is self evident from the 'Cinema Gap Analysis' that forms an appendix to the WLRNS (and is included as Document 8).

Document 8

- 7.10 Given the existing cinema within Southall town centre is a specialist cinema, it is considered that the two would be complimentary and there would, therefore, be no detrimental impact on the existing town centre facility. In fact, it would have a positive impact on Southall by retaining leisure expenditure that is currently lost to competing centres in West London, would serve to improve Southall's overall offer and reduce existing unsustainable travel patterns.

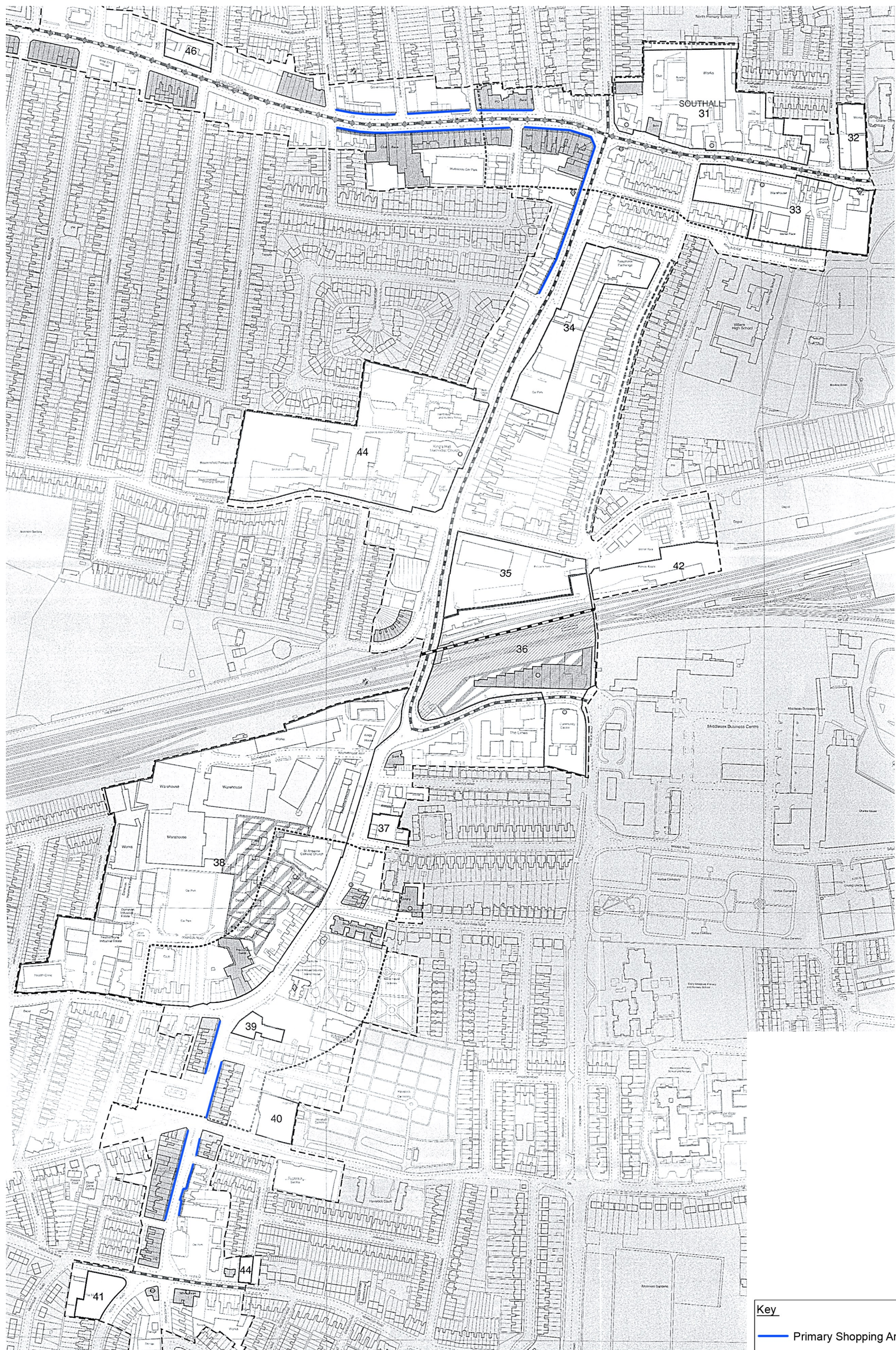
SECTION 8: CONCLUSIONS

- 8.1 The application proposals will deliver a genuine mixed-use development comprising residential, commercial, leisure and hotel facilities, together with community facilities and open space on a brownfield site. As part of this mix of uses, 20,050m² of retail floorspace is proposed. This is fundamental to the overall success of the scheme, delivering a much needed 'seed change' to the retail offer of Southall town centre and providing for the day-to-day shopping needs for the new residents of West Southall.
- 8.2 The application site is identified as a 'Special Opportunity Site' and a 'Development Site' in the adopted Ealing UDP (October 2004). Specifically, it is considered for a mix of uses, including an appropriate element of retail. The emerging Ealing LDF identifies one option for Southall, which includes extending the town centre boundary to *"take the opportunity for high quality retail and allied development on Southall Gas Works as part of a reconfigured centre to complement Southall's ethnic retail strengths"*.
- 8.3 Southall is defined as a Major Centre in the London Plan. The retail offer in Southall is dominated by independent ethnic retailers selling a wide range of convenience and comparison goods. There is also a range of specialist professional services, such as banks, travel agents and foreign currency exchanges. There are, however, very few national multiple retailers in Southall town centre, limited to Burton, Superdrug and Woolworths in the comparison sector, and Iceland and Somerfield in the convenience sector. The shopping and service mix and lack of investment by national retailers is identified as a weakness of the town centre by LB Ealing in their Southall Town Centre Strategy.
- 8.4 Southall performs woefully in terms of its retention levels for fashion retailing and luxury goods, particularly when compared with other comparable order centres in West London. In order to improve Southall's retailer representation in these higher order sectors, high quality modern retail floorspace is required of a sufficient quantum to attract a critical mass of nationally recognised retailers; incremental additions to Southall's retail provision will not achieve the step change required to shift established shopping patterns.
- 8.5 Based on an update of the work undertaken as part of the WLRNS (to include improved retention rates), it is clear that there is more than sufficient available expenditure in both the comparison and convenience goods sectors to support the scheme in its totality. Indeed, there is sufficient residual available expenditure to support further floorspace within Southall over and above the floorspace proposed.
- 8.6 The application proposals will address a number of qualitative deficiencies in Southall's retail offer. In particular, it would accommodate a number of larger floorplate retail units specifically designed to meet the requirements of modern fashion retailers, which would allow for a critical mass of national multiples to be established. This would significantly assist in retaining expenditure within the town centre, without which there is a danger that Southall will continue to decline in relative terms (compared to other Major Centres in West London, such as Hammersmith, Chiswick and Fulham).

- 8.7 The proposed retail development, and indeed the other mixed-uses proposed are designed as a genuine extension to Southall town centre; the aim is for the two to work together and to be perceived and function as one shopping destination serving the needs of Southall's residents and the immediate catchment. To this end, the West Southall Masterplan incorporates strong pedestrian connections between the retail elements (concentrated on East Street and Town Square) and Beconsfield Road to the north (which in turn connects to the retail core of Broadway) and South Road to the east. These would provide strong connections between the proposals and Southall's existing Primary Shopping Area.
- 8.8 Despite the strong links to Southall town centre, it is not to say that the proposed new shops will not draw some of their trade from existing retailers. They will conversely though, by attracting more people to shop in Southall, and particularly by retaining a far greater proportion of the town's actual catchment area spend, lead to spin-off spending within Southall's existing town centre shops. The impact of the proposals on Southall town centre would be approximately 8.7%; this is very much a worst case scenario as it does not allow for any increased clawback to Southall's town centre retailers arriving out of improved retention rates.
- 8.9 The other predicted impacts on identified town centres within the catchment range from 4.3% to 0.23%. For Hayes the predicted impact is 4.3% while for Hanwell it is 0.42%. None of these projected impacts are considered to be of a level to cause concern to the vitality or viability of those centres.
- 8.10 Overall, the levels of impact that would potentially arise as a result of the retail floorspace proposed would not give rise to any planning harm such that consent could reasonably be refused. On the contrary, the proposals would deliver real and tangible planning benefits in terms of an enhanced retail offer consistent with Southall's position in the retail hierarchy, choice and competition in shopping and delivering more sustainable shopping patterns.
- 8.11 The type and scale of retail development proposed is consistent with Southall's position in the retail hierarchy. In fact it would ensure Southall fulfils its role as a Major Centre. A critical mass of retail floorspace is required, including an anchor, such as the proposed foodstore, for the scheme to trade effectively against competing centres and to be a viable commercial proposition.
- 8.12 A detailed sequential assessment has been undertaken, which considers a total of 23 sites within, or on the edge of, Southall town centre that are either identified for development in the adopted UDP, emerging LDF or are vacant sites with redevelopment potential. From that assessment, it is considered that there are no sites that can genuinely be considered to be available, suitable or viable for the application proposals.
- 8.13 Although there are currently a proportion of vacant units within Southall town centre, the number falls well below the national average and is likely to be a reflection of a general 'turn around' of independent retailers. None of the vacant units are suitable for the type of retailers who will be attracted to West Southall; they are too small (even if units could be amalgamated) for major fashion retailers and there is no sufficient existing anchor (such as a department store) that would give retailers sufficient confidence to locate in the town centre. Again, the quantum and type of retail units proposed as part of this scheme

are fundamental in terms of achieving a 'step change' to Southall's retail offer.

- 8.14 The West Southall Masterplan incorporates a multi-screen cinema at the eastern entrance to the scheme off East Street. Although it is recognised that there is an existing cinema (The Himalayan Palace) in Southall town centre, this is specialist in nature (showing only Bollywood films) and the majority of residents in Southall currently travel to cinemas in Feltham, Park Royal or Uxbridge. The WLRNS recognises that there is a 'gap' in cinema provision in Ealing Borough and that a mainstream cinema (of circa 6 screens) could be supported. The proposals at West Southall would meet this identified requirement.
- 8.15 In summary, the application proposals will deliver a truly mixed-use development that is consistent with all strands of planning policy. The retail component is an integral element of the scheme and, which is fundamental to its overall success, as well as the future performance of Southall town centre.



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Project:
Southall Gas Works

Title:
Southall PSA

Figure No:
JLI0719/02

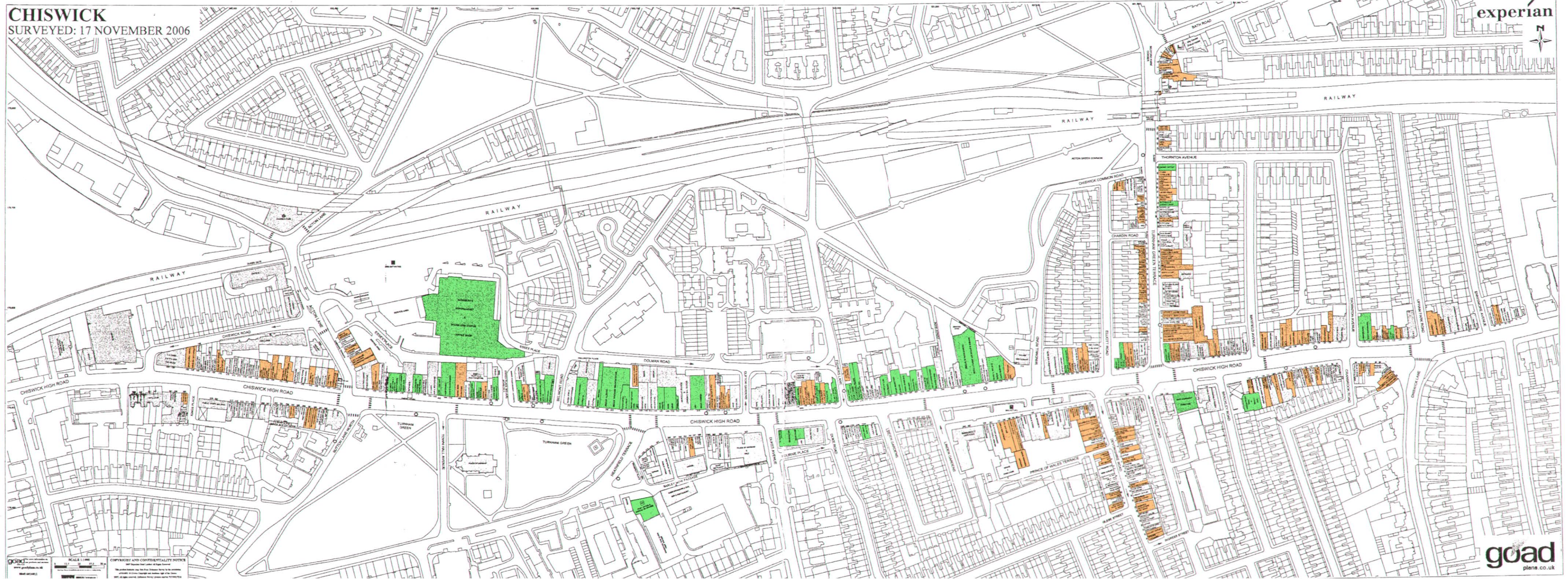
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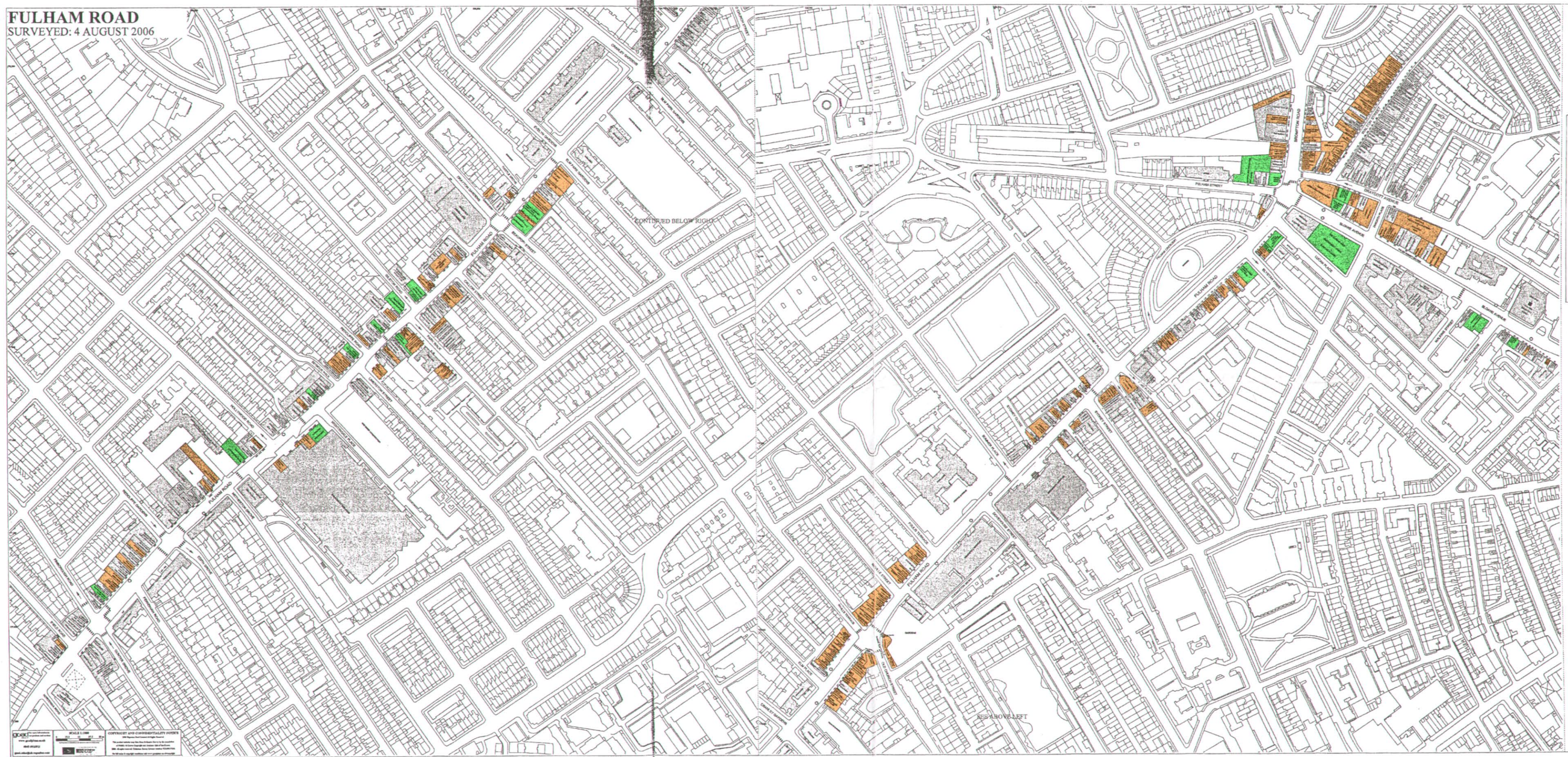
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Project:	Southall Gas Works
Title:	Comparison of National and Local Retailers in Chiswick
Figure No:	JLI0791-04

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FULHAM ROAD
SURVEYED: 4 AUGUST 2006




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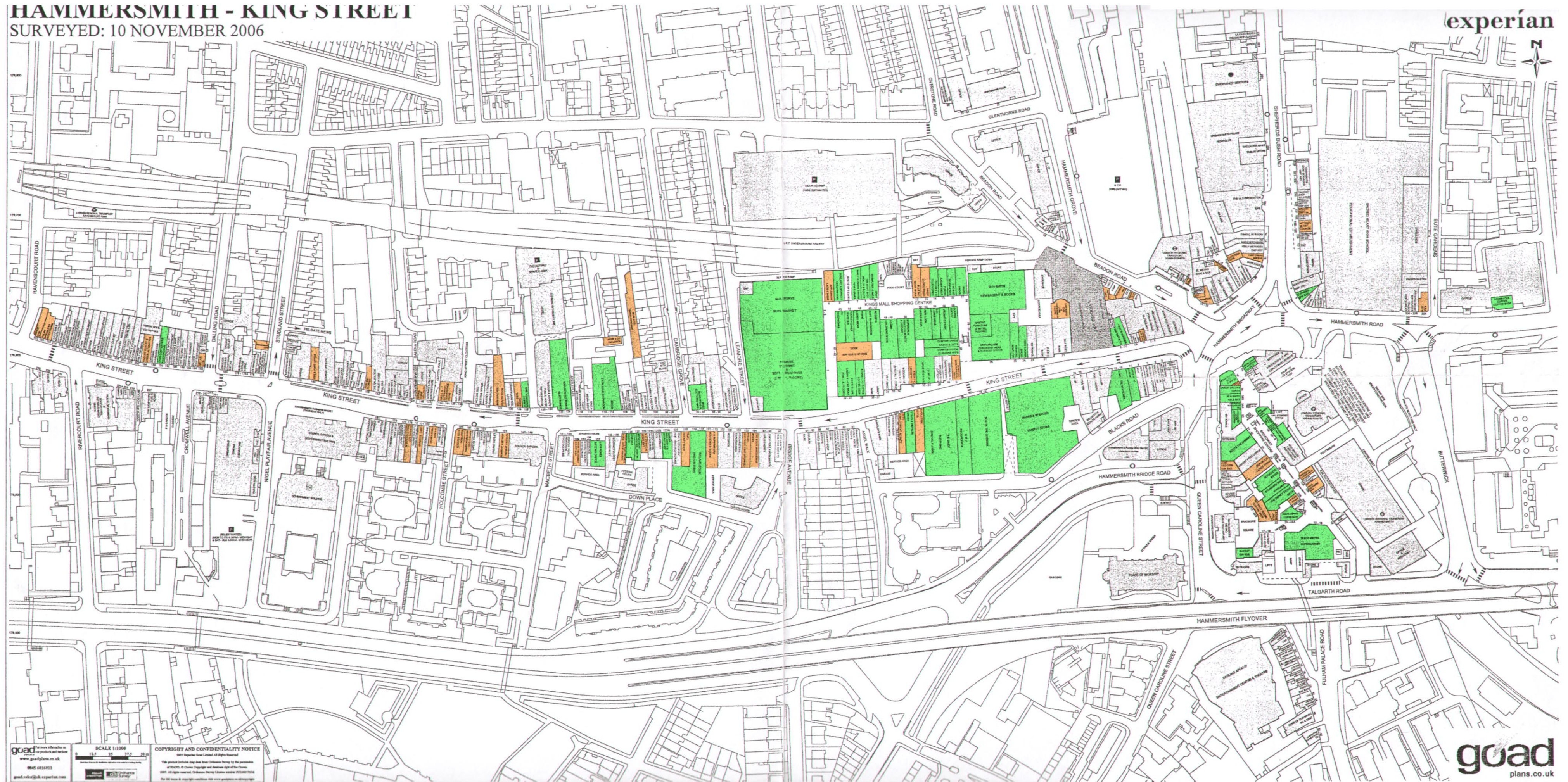
			
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Job No:	JLI0791	Drawn:	YZ
		Checked:	JM

Project:	Southall Gas Works
Title:	Comparison of National and Local Retailers in Fulham Road
Figure No:	JLI0791-04

Drawing Ref.

HAMMERSMITH - KING STREET
 SURVEYED: 10 NOVEMBER 2006

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- National multiple retailers
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Date:	11.09.07	Scale:	NTS
Job No:	JLI0791	Drawn:	MB
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		Checked:	JM



Project:	Southall Gas Work
Title:	National and Local Retailers in Hammersmith
Figure No:	JLI0791-04


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SOUTHALL
SURVEYED: 12 DECEMBER 2006

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-  National multiple retailers
-  Local/ independent retailers

			
Date:	11.09.07	Scale:	NTS
Job No:	JLI0791	Drawn:	MB
		Checked:	JM

Project:	Southall Gas Works
Title:	Comparison of National and Local Retailers in Southall
Figure No:	JLI0791-04

Drawing Ref:

Table 25: Expenditure Draw of the Proposed Floorspace at 2016 across Zones 1 to 30 based on the WLRNS's Trade Draw Pattern

Zone	% Draw to Southall TC (Baseline) 2016 No Commitments	% Draw to Southall TC 2016 With Commitments	% Increase	2016 Spend Baseline (£000) No Commitments	2016 Spend with Commitments	% Increase Spend	Additional Expenditure Attracted as a Result of WLRNS Considered Proposal (£000)	Increased Spend at 2016 Attributed to Current Proposals (25% Uplift) (£000)	Total 2016 Spend with Current Proposals (£000)
1	0	0	0	0	0	0	0	0	0
2	0	0	0	0	0	0	0	0	0
3	0	1	1	1,112	2,861	157	1,749	2,186	3,298
4	0	1	1	833	2,143	157	1,310	1,637	247
5	0	1	1	843	2,170	157	1,327	1,659	2,502
6	0	1	1	823	1,538	86	715	894	1,717
7	0	0	0	102	264	158	162	202	304
8	1	3	2	1,826	4,550	149	2,724	3,405	5,231
9	7	16	9	7,103	16,898	138	9,795	12,244	19,347
10	6	11	5	9,273	19,190	107	9,917	12,396	21,669
11	1	3	2	1,507	3,877	157	2,370	2,962	4,469
12	4	10	6	3,612	9,295	157	5,683	7,104	10,716
13	0	0	0	0	0	0	0	0	0
14	1	1	0	1,538	2,135	39	597	746	2,284
15	1	1	0	1,235	1,569	27	334	417	1,652
16	0	0	0	0	0	0	0	0	0
17	0	1	1	599	1,542	157	943	1,179	1,778
18	0	0	0	0	0	0	0	0	0
19	0	0	0	0	0	0	0	0	0
20	0	0	0	0	0	0	0	0	0
21	0	0	0	0	0	0	0	0	0
22	0	0	0	0	0	0	0	0	0
23	0	0	0	45	116	158	42	52	97
24	2	5	3	1,724	4,436	157	2,712	3,390	5,114
25	2	6	4	5,680	14,618	157	8,938	11,172	16,852
26	0	0	0	0	0	0	0	0	0
27	0	0	0	885	1,948	120	1,063	1,329	2,214
28	0	0	0	0	0	0	0	0	0
29	0	1	1	1,843	4,743	157	2,900	3,625	5,468
30	0	0	0	0	0	0	0	0	0
				40,583	93,893			66,599	104,959

GREENFORD TOWN CENTRE HEALTH CHECK

Greenford is defined as a District Centre within the London Plan. It is located to the south of the A40 in an established residential area composed of mainly 1930's and 1950's properties. It is c.2.8 miles from Southall Town Centre. The centre is located at the junction of Greenford Road and Ruislip Road/The Broadway. The prime retail area extends along Ruislip Road, sloping upwards towards the junction with Oldfield Lane South where there is an area of open space and Greenford Hall.

The highest area of pedestrian footfall in Greenford Centre is situated where the Broadway meets Greenford Road. There are also high flows at the top of the Broadway around the VB supermarket.

Diversity of Use

Figures from the latest GOAD Report for Greenford Town Centre (August 2007) indicate a gross retail floorspace for the town centre of 19,575 sq m and suggests it is predominantly comprises comparison retail floorspace (although it still falls below the UK average in this category). Convenience retail however is above the UK average in terms of outlet numbers and amount of floorspace. The centre is also supported by service related floorspace, which is also at a level above the national average.

Table 1: Retail Composition by Outlet Number

	Outlet Numbers	Greenford Percentage	GB Percentage
Convenience	29	21.17	9.09
Comparison	48	35.04	44.95
Service	49	35.77	33.37
Vacant	8	5.84	11.29

Source: GOAD

Table 2: Retail Composition by Floorspace

	Floorspace (Sq m)	Greenford Percentage	GB Percentage
Convenience	5695	27.88	16.68
Comparison	7767	38.02	50.93
Service	5407	26.47	21.77
Vacant	706	3.46	9.52

Source: GOAD

Retailer Representation

Greenford Town Centre has a total of 134 units and is anchored by a Tesco and Lidl store, as well as a range of financial services including Barclays, Lloyds TSB, HSBC, Abbey, Halifax and Nationwide Building Society.

Other Key retailers include, Boots, Woolworths, Greggs and Hallmark Cards. There are also a large number of independent retailers including convenience retailers such as VB Supermarket, Mezopotamia Food Centre, Greenford Halal Meat Butcher and Greenford foods Grocer.

Greenford Hall is situated to the north of the centre and is a community facility operated by London Borough of Ealing. It includes a nursery and also room to hire for other events. A library is also located along Oldfield Lane.

A range of ethnic retailers are also present within the town centre. VB Supermarket is, for instance, a large independent Asian supermarket and there are many other Irish, Polish, Turkish Afro Caribbean and Asian foodstores within the town centre. A number of charity shops area are also present in the town centre.

Westway Retail Park is situated in an out-of-centre location to the north of the town centre, adjacent to Greenford Station. This is approximately 7-8 mins by bus from the town centre and provides a range of comparison retailers such as Outfit, the Carphone Warehouse, Boots, Next, Sports Direct, Brantano Footwear and Hobbycraft as well as a McDonald's. The retail offer at Westway Retail Park is likely to act

as a draw from Greenford Town Centre, especially in the category of comparison retailers as it offers a broader range of high street retailers than those present within Greenford Town Centre itself.



Figure 1: Ruislip Road East

Rents and Yields

According to the WLRNS, no rental information is available for Greenford. However that study indicates that retail yields have fallen in Greenford since their peak at 10% in 2002, which may be a potential sign of growing investor confidence. In January 2006 retail yields stood at 9.5%.

Vacancies

The GOAD centre report (2007) indicates that vacancies are almost 50% below the national average. The vacancy percentage stands at 5.84% of outlets compared to the national average of 11.29%.

The vacancies that exist are generally located on the edge of the town centre (and secondary shopping frontages) with a small number located in the main shopping area on Greenford Road.

Pedestrian Flows

As a relatively compact town centre, observations of pedestrian flows illustrate the prime shopping circuit is along the northern side of Greenford Road and the western section of the Broadway on Ruislip Road. This circuit encompasses the majority of the retail offer and market.

Accessibility

Greenford Town Centre is not within walking distance of any train or underground stations. Greenford Station, on the London Underground's Central Line and providing National Rail Services into London Paddington is located to the north of the Town Centre. Greenford is well served by bus services to Ruislip, Wembley, Hayes, Southall, Heathrow Airport, Ealing and Acton.

Greenford also has several car parks. There is a small car park to the rear of the Tesco Metro supermarket and there is a 200 space surface car park behind VB Superstore.

Environmental Quality

Overall Greenford is a relatively attractive district centre that is well maintained. The majority of the buildings date from the 1930's and many have art deco features and are noted as having architectural quality in the UDP. Several of the buildings have been sympathetically converted including the Tesco Metro. The majority of the buildings are between 2-3 storeys with a newer 5-storey development incorporating Lidl at ground floor level and residential above and also the 6-storey Central West residential development, both on Ruislip Road East. The Red Lion Public House on the corner of Greenford Road and Ruislip Road is a key landmark building in the centre.



Fig 2: New Lidl and Residential development on Ruislip Road East

Ruislip road has wide pavements along the Broadway with some seating and street furniture present. The Broadway is also lined with mature trees with planting beds distributed across the town centre and large flower planters at the junction with Oldfield Lane South. These planters were in bloom at the time of the visit and overall contributed the centre's attractive environment.

Crime and Safety

An active presence of police was noticeable on the day of the visit, providing a perception of safety.

Conclusions

Greenford Town Centre performs well as a district centre, anchored by its convenience retail provision, serving the surrounding residential area. However, there is a noticeable lack of comparison floorspace in the town centre and the Westway Retail Park (which is out of centre) accommodates a number high street fashion and national retailers who are represented within the town centre itself.

There is sign of recent investment in the centre (for example, Lidl) and vacancies are low; the town centre is therefore considered viable.

HANWELL TOWN CENTRE HEALTH CHECK

Hanwell is defined as a District Centre within the London Plan. It is located on the Uxbridge Road in the west of the London Borough of Ealing. The centre is situated along Uxbridge Road from the Viaduct Public House eastwards as far as its junction with Church Road. A section also runs down Boston Road to the Studley Grange Service station. The prime retail area extends along The Uxbridge Road section of the centre with the strongest pedestrian flows in the town centre around the clock tower.

Diversity of Use

Figures from the latest GOAD Report for Hanwell Town Centre (August 2006) indicate a gross retail floorspace for the town centre of 18,757 sq m and suggests it is predominantly composed of comparison retail (with slightly above the UK average figures in this category). Convenience retail however is below the UK average in terms of outlet numbers and amount of floorspace. The centre is also supported by service related floorspace, which is also at a level above the national average.

Retail Composition by Outlet Number

	Outlet Numbers	Hanwell Percentage	GB Percentage
Convenience	17	11.89	9.44
Comparison	53	37.06	44.66
Service	51	35.66	33.65
Vacant	22	15.38	12.24

Source: GOAD

Retail Composition by Floorspace

	Floorspace (Sq m)	Hanwell Percentage	GB Percentage
Convenience	2517	13.42	17.18
Comparison	10135	54.04	50.59
Service	4385	23.38	21.88
Vacant	1718	9.16	10.34

Source: GOAD

Retailer Representation

Hanwell Town Centre has a total of 143 units and is anchored by a Lidl store located on an edge of centre site off the south side of Uxbridge Road and west of Boston Road, as well as a range of comparison retailers such as Wickes DIY at the junction of Boston Road and Lower Boston Road.

Other Key retailers include, Poundstretcher and Dominos Pizza. There are also a large number of independent retailers including convenience retailers such as Quality Cut Halal Meat Butcher and Hanwell Traders Convenience Store. There are also a large number of car sales and service floorspace including Grays Tyre's and Exhausts, Grays Motorsports Car Spares, Hanwell Car Sales, JR Car Sales and Warwick Wright Peugeot Car Sales. Gold's Gym Health Club is situated to the east of the centre and there is also a Self Access Storage Warehouse to the south along Boston Road.

The centre lacks some key services such as a high street bank. There is, however, a privately operated cash point outside Gold's Gym.

Rents and Yields

Data not available.

Vacancies

The GOAD centre report (2006) indicates that vacancies are slightly above the national average in terms of outlet numbers but similar in terms of floorspace. The vacancy percentage stands at 15.38% of outlets compared to the national average of 12.24% at the time of the survey.

The vacancies that exist are generally located along Boston Road and the edge of the town centre with a small number located in the main shopping area on Uxbridge Road.



Fig 1: Lidl and Poundstretcher stores to the south of the Uxbridge Road

Pedestrian Flows

Hanwell is compact town centre and it is seen that the predominant area of frequent pedestrian flows, which illustrates the prime shopping circuit, is along Uxbridge Road near its junction with Boston Road and Cherington Road at the clock tower. This circuit encompasses the majority of the retail offer and market with Lidl a short walk to the east.

Accessibility

Hanwell Town Centre is within 15 minutes walk of Hanwell Train Station, which provides National Rail Services into London Paddington. Hanwell is also well served by bus services to Uxbridge, Southall and Ealing. Several car parks are also found within the town centre. Lidl, Poundstretcher and Wickes all have their own parking facilities and Euro Car Parks operate a 100-space car park adjacent to Poundstretcher.

Environmental Quality

Overall Hanwell is not considered an attractive district centre. The majority of the buildings along Boston Road have a run down character and there seems to be a mix of three storey Victorian properties with modern unattractive infill development.

There is visible litter on the streets and graffiti in some parts, which does not contribute to achieving a public realm, which can be considered to be of any quality. The broad footpaths around the clock tower does provide some outdoor seating areas for cafes and there is an area of landscaping at this point. Overall, however, the area is underutilised and therefore is lacking in attractiveness.



Fig 2: Area around the Clock Tower on Uxbridge Road from Boston Road

Crime and Safety

The WLRNS makes reference to the London Borough of Ealing Council and their awareness of the need to reduce crime and deal with street drinking problems within the town centre.

Conclusions

Hanwell is performing reasonably well as a district centre. It is anchored by one major convenience retailer (Lidl), and performs a local convenience-shopping role, particularly given the noticeable lack of comparison floorspace in the form of high street retailers and fashion outlets. The centre is, however, deficient in some basic services, which is observed in the lack of any high street banks within the centre.

HAYES TOWN CENTRE HEALTH CHECK

Hayes is defined as a District Centre within the London Plan. It is located in the London Borough of Hillingdon to the northwest of London. The centre runs on a south west to north east axis from the Hayes and Harlington National Rail Station at Station Road to the Total Service Station on Coldharbour Lane. There are also parts of the town centre located off this main thoroughfare such as Clayton Road and Botwell Lane, which run westwards from Station Road. Chailey Industrial Estate is also situated on Pump Lane, east of Station Road.

The highest area of pedestrian footfall in Hayes town centre is seen on Station Road between the canal crossing and its junction with Botwell Lane.

Diversity of Use

Figures from the latest GOAD Report for Hayes Town Centre (November 2007) indicate a gross retail floorspace for the town centre of 33,000 sq m and suggests it is predominantly composed of comparison retail floorspace, although with marginally lower representation than the national average in terms of percentage of units (36.7% in Hayes compared to 45.14% nationally). In terms of percentage of comparison floorspace however, the Hayes figure is close to that of the national average at 52.14% and 51% respectively. Figures for convenience retail are above the UK average in terms of outlet numbers and amount of floorspace. At the time of the latest GOAD study 17.02% of outlets in Hayes were in convenience use, which accounted for 17.8% of the retail floorspace. The centre is also supported by service related floorspace, which is at a level similar to the national average in terms of outlet numbers.

Retail Composition by Outlet Number

	Outlet Numbers	Hayes Percentage	GB Percentage
Convenience	32	17.02	9.08
Comparison	69	36.7	45.14
Service	68	36.17	33.3
Vacant	14	7.45	11.17

Source: GOAD

Retail Composition by Floorspace

	Floorspace (Sq m)	Hayes Percentage	GB Percentage
Convenience	5983	17.8	16.69
Comparison	17522	52.14	51
Service	7581	22.56	21.78
Vacant	1914	5.7	9.41

Source: GOAD

Retailer Representation

In terms of convenience retailers, Iceland is located in Hayes Town Centre and anchors it as the only major national convenience food retailer within the centre. There are many other convenience outlets within the centre, including Costcutter and other smaller independent and ethnic retailers. Sainsbury's is located at an out-of-centre location in the Lombardy Retail Park.

A number of other national multiple retailers are represented, including Woolworths, Wilkinsons, Boots, Carphone Warehouse, WHSmith, Superdrug, Greggs, Blockbuster Video Rental, Kwik-Fit, Subway, KFC and McDonalds all located along Station Road and the southern section of Coldharbour Lane. Matalan clothing outlet is also located at an edge of centre location east of the Chailey Industrial Estate on Pump Lane. Many other independent retailers make up the retail offer in the form of banks and communication shops as well as several small independent comparison retailers. Overall, only 7 out of the 30 major retailers identified by GOAD as 'key attractors' report are represented within the town centre.



Fig 1: Iceland Food Store, Station Road

The centre also offers many key services such as a high street banks with Barclays, HSBC, Abbey, Nat West, Lloyds TSB, Halifax and Nationwide all located within the centre.

The Lombardy Retail Park is also located at an out of centre location on the north of Coldharbour Lane, a 10-15 minute walk from the town centre of Hayes. This provides a range of comparison retailers such as Next, Sports Direct, JJB Sports, Mothercare, Homebase as well as a Pizza Hut and McDonald's. The retail offer at Lombardy Retail Park is likely to act as a draw from Hayes Town Centre.

There is evidence of recent investment within Hayes Town Centre, with residential development currently under construction along the canal near the train station. At the time of the visit, Sainsbury's were also in the process of constructing an extension to their store at the Lombardy Retail Park.

Rents and Yields

Information not available.

Vacancies

The vacancy rate within Hayes is low. Overall, at the time the latest GOAD study was compiled at the end of 2006, 7.45% of units in the town centre were vacant compared to the national figure of 11.17%. In terms of floorspace these figures are 5.7% and 9.41% respectively.

Pedestrian Flows

Hayes is a relatively compact town centre and it is seen that the highest levels of pedestrian flow are at Station Road between the canal crossing and its junction with Botwell Lane. Traffic control measures operate on this stretch of the road and broad footpaths facilitate pedestrian movements. On-street parking is also available at this location.



Fig 2: Parade of shops along Coldharbour Lane

Accessibility

Hayes Town Centre is ideally located a short walk from Hayes and Harlington National Rail Station, which is situated at the railway bridge on Station Road. This station provides frequent services between Hayes and London Paddington and Heathrow Airport. Hayes is also very well served by bus services to Hanwell, Southall, Ealing and Uxbridge.

A number of car parks are found within the town centre. On street parking is available on Station Road while there is also a public car park on Pump lane, which provides spaces for 80 cars. The Matalan Store on Pump Lane provides parking for an additional 110 cars while Iceland and Wilkinson's can accommodate 50 and 110 cars respectively over their stores. Further parking provision is available south of the train station where approximately 140 spaces are provided.

Environmental Quality

Overall, Hayes is considered attractive in parts but not in others areas. There are several attractive and well-maintained buildings within the centre along Station Road such as the old Post Office building. The style of architecture is more uniform in this part while a mix of styles is observed along the Coldharbour Lane with some examples of 1980's retail and office buildings. Modern architecture was also seen throughout the centre.

The town centre lacks public open space. A green space is provided off East Avenue, which runs parallel to Coldharbour Lane. However, at the time of the centre visit, a large part of this space was under construction, which may signal a loss of already scarce green space. In the areas of most pedestrian footfall, traffic controls were in place and there were some examples of attractive street furniture such as the bandstand at the northern point of Station Road. This area was also tree lined and was also provided with flower boxes which overall provided for an attractive streetscene in this part of the centre. Outdoor seating was also provided.

There was however evidence of litter on the streets and many shop fronts were poorly maintained especially along Coldharbour Lane. This took from the overall quality and amenity of the public realm.

Crime and Safety

CCTV cameras operate in the area and police were also observed patrolling the centre which gave the impression that the centre is a relatively crime free and safe area.

Conclusions

Hayes is performing well as a District Centre; it is anchored by its convenience retail offer. There is, however, a good range of comparison retailers although these are predominantly independent retailers, with high street/national multiple retailers represented at the Lombardy Retail Park (which is out of centre). The centre is however, host to many service facilities especially in financial services with the presence of all the major high street banks within the centre.

There are also signs of recent investment in the centre and therefore the centre is considered to be both vital and viable.

UXBRIDGE TOWN CENTRE HEALTH CHECK

Uxbridge is defined as a Major Centre within the London Plan. It is located in the London Borough of Hillingdon to the northwest of London. The centre is situated along High Street, which runs from southeast to the northwest where it meets Harefield Road. Part of the town centre also runs from High Street westwards along Windsor Street while another section runs to the east along Belmont Road. The prime retail area is situated at High Street close to the entrance of Uxbridge Underground Station, which is fully pedestrianised and experiences the heaviest pedestrian footfalls.

Diversity of Use

Figures from the latest GOAD Report for Uxbridge Town Centre (November 2007) indicate a gross retail floorspace for the town centre of 87,060 sq m and suggest it is predominantly composed of comparison retail showing figures, which are higher than the national average in terms of number of units and percentage of floorspace. According to the 2007 survey, 52.87% of outlets are comparison retailers, which accounts for 67.4% of the available retail floorspace within Uxbridge Town Centre. GB average figures for these categories are 44.95% and 50.93% respectively. Figures for convenience retail, however, is below the GB average in terms of outlet numbers and amount of floorspace. At the time of the latest GOAD study 5.73% of outlets in Uxbridge Town Centre were related to convenience retail activity, which accounted for 11.96% of the retail floorspace. The centre is also supported by service related floorspace, which is at a level similar to the national average in terms of outlet numbers.

Retail Composition by Outlet Number

	Outlet Numbers	Uxbridge Percentage	GB Percentage
Convenience	18	5.73	9.09
Comparison	166	52.87	44.95
Service	98	31.21	33.37
Vacant	20	6.37	11.29

Source: GOAD

Retail Composition by Floorspace

	Floorspace (Sq m)	Uxbridge Percentage	GB Percentage
Convenience	10619	11.96	16.68
Comparison	59839	67.40	50.93
Service	14530	16.36	21.77
Vacant	2072	2.33	9.52

Source: GOAD

Retailer Representation

In terms of convenience retailers, Tesco, Sainsbury's and Iceland are all located in Uxbridge. Tesco and Marks and Spencer are located on High Street while Iceland is located within the Pavillion Shopping Centre. The Sainsbury's supermarket is located at an out of centre location.

Within the town centre, including the Pavillions and the Chimes Shopping Centres, there are a number of national comparison retailers such as River Island, Argos, BhS, Boots, Burton, Carphone Warehouse, Currys, Debenhams, H&M, HMV, Marks and Spencer, New Look, Next, GAP, Superdrug, Topshop, Vodafone, WHSmith, Wilkinsons and Woolworths.

Overall, 24 out of the 30 major retailers listed within the GOAD report as 'key attractors' are represented within the town centre. This is indicative of Uxbridge's role as a Major Centre.

Other Key retailers include, the Body Shop, JJB Sports and Clinton Cards. There are also a large number of independent retailers including convenience retailers within the centre, especially along Windsor Street and within the Pavillions Shopping Centre. Examples are the Party Shop and Lemmings Menswear on Windsor Street and also Randall's Department Store on Vine Street, which comprises a large retail space across two floors.

The centre is also well represented in key services such as a high street banks with Barclays, HSBC, Abbey, Nat West, Lloyds TSB and Bank of Scotland all located within the centre.

An Odeon 9 screen cinema forms part of the Chimes Shopping Centre. A number of other leisure facilities are also located in the Town Centre such as Fitness First Health Club and Uxbridge Snooker Club, as well as bars, restaurants and Liquid and Envy nightclubs.

There is also evidence of current investment within Uxbridge Town Centre, by way of the Travelodge located adjacent to the underground station and the bus terminus on Bakers Road. This development is nearing completion. Dominion Housing Group, working with the Housing Corporation, is also developing Nova Point above the Pavillions Shopping Centre. This development will provide 14 one bedroom and 12 two bedroom apartments available for sale through the part rent part buy scheme.



Fig 1: The Chimes Shopping Centre and view of Main Street

Rents and Yields

Data not available.

Vacancies

The vacancy rate within Uxbridge is low. Many of these vacant units are located within secondary shopping frontages with a limited number of units available within the Pavillions Shopping Centre. Overall, at the time the latest GOAD study was compiled in 2007, 6.37% of units in the town centre were vacant compared to the national figure of 11.29%. In terms of floorspace these figures are 2.33% and 9.52% respectively.

Pedestrian Flows

Uxbridge is a large town centre and it is seen that the highest level of pedestrian flow, is between the Chimes Shopping Centre and Tesco on the High Street. The vast majority of this area is pedestrianised or given pedestrian priority over cars and therefore is easily navigated. Heavy pedestrian flows were also noted within the Chimes Shopping Centre and the Pavillions Shopping Centres themselves.

Accessibility

Uxbridge Town Centre is ideally located adjacent to Uxbridge London Underground Station, which is accessed via the main entrance on High Street. This station provides frequent services between Uxbridge and central London via the Piccadilly Line and the Metropolitan Line. Uxbridge is also very well served by bus services to, Harefield, Southall, Hayes and Ealing.

Several car parks are also found within the centre. Above the Tesco supermarket the car park can accommodate up to 550 cars while the Chimes Shopping Centre car park, accessible from Chippendale Way is capable of accommodating 1600 cars. 600 parking spaces are estimated over Marks and Spencer.

Environmental Quality

Overall Uxbridge can be considered an attractive centre; the majority of the buildings along Windsor Street are 2-3 storey Victorian properties. A mix of styles is observed along High Street with 2-3 storey Victorian buildings, some examples of the Tudor Style and also many modern developments such as the Chimes Shopping Centre, which ties into the area quite well, helping to preserve the street scene.

The creation of a large pedestrianised area at the front of the Underground Station has provided the opportunity to create a public space of quality, complete with outdoor seating and good examples of attractive street furniture and statues. This area is also paved in natural stone and brick. High Street is also lined with trees on either side, which enhances the centre. Hanging flower baskets are also attached to lampposts throughout the centre. These flowers were in bloom at the time of the site visit.

There was little evidence of litter on the streets and bins were placed at frequent intervals along the streets and little evidence of graffiti was noted. This contributes to achieving a public realm, which can be considered to be of quality.



Fig 2: View of Pedestrian Area to the front of Uxbridge London Underground Station

Crime and Safety

CCTV cameras were highly visible within the town centre and there was an overall impression that the centre is relatively crime free and safe.

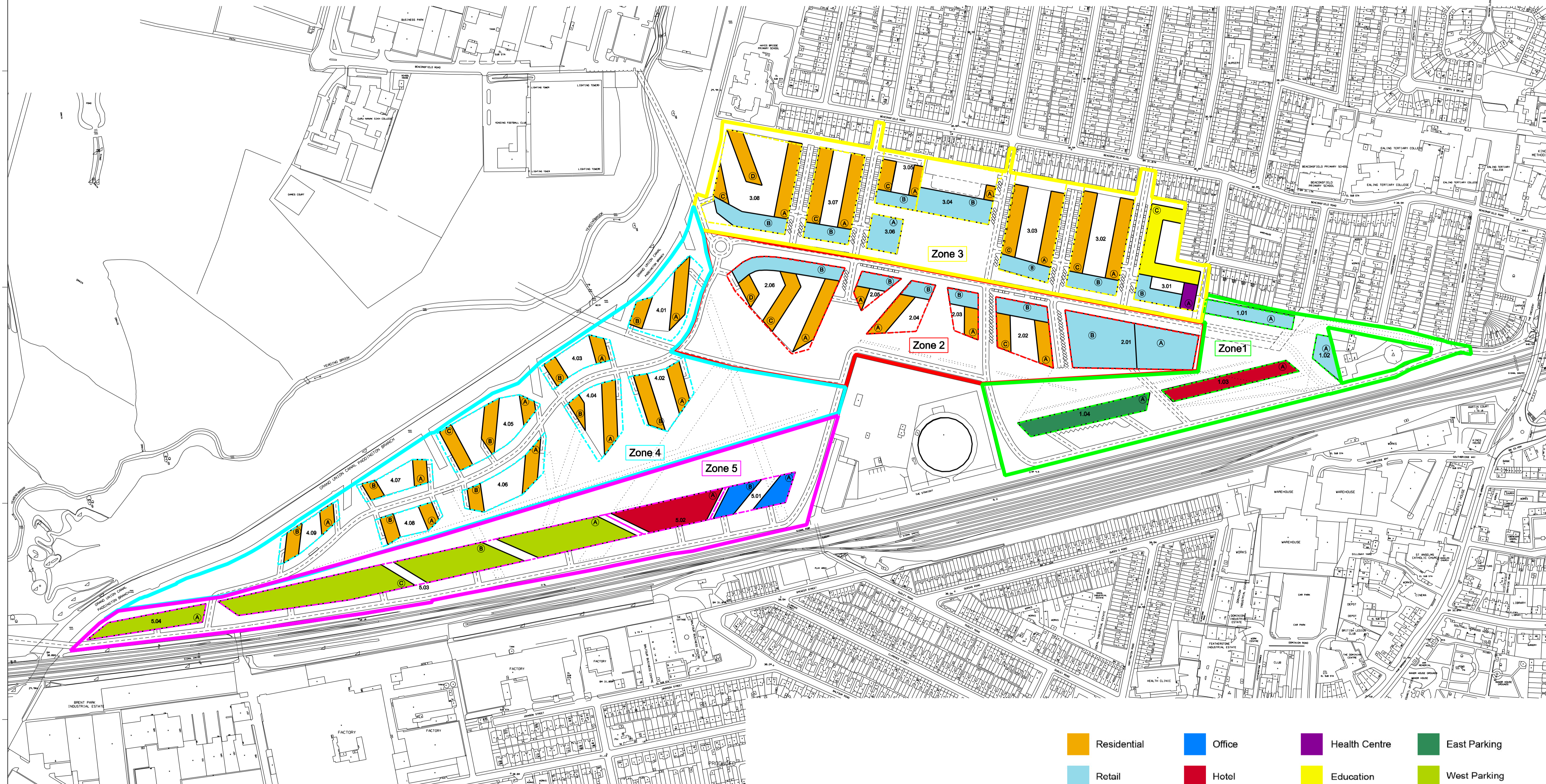
Conclusions

Uxbridge is performing well as a Major Centre. There is good representation from both comparison and convenience retailers including a number of national retailers and 'key attractors.' The range of services is good (including leisure) and there are signs of recent investment. The centre was busy at the time of the survey (mid-week) and scores highly in terms of its vitality and viability.



Fig 3: View of Pedestrianised Area along Main Street to from of the Pavillions Shopping Centre

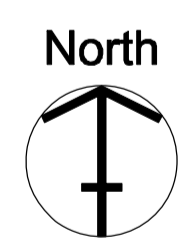
- General Notes**
1. Dimensions are in millimetres unless stated otherwise.
 2. Levels are in metres AOD (above ordnance datum) unless stated otherwise.
 3. Dimensions govern. Do not scale off drawing.
 4. All dimensions to be verified on site before proceeding.
 5. All discrepancies to be notified in writing to make architects.
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00	03.04.07	Concept Design Iteration 01	
Rev	Date	Reason For Issue	Chk

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Client
**National Grid Property /
 Castlemore Securities Limited**



Project
Southall Gasworks Masterplan

Drawing Title
Ground Floor Site Plan

- Residential
- Office
- Health Centre
- East Parking
- Retail
- Hotel
- Education
- West Parking

Scale	Paper Size	Date
1: 2500	A1	03.04.07
Project No.	Draw No.	Rev. No.
0317	A1001	00

317 Southall Gasworks Masterplan

Gross area overview

02-Apr-07

	Zone 1 GEA (m ²)	Zone 2 GEA (m ²)	Zone 3 GEA (m ²)	Zone 4 GEA (m ²)	Zone 5 GEA (m ²)	Total GEA (m ²)	Total GEA (ft ²)	Max. no. of storeys	Indicative no. parking spaces	Indicative no. hotel rooms
Residential	4,896	90,575	68,522	76,073	0	240,066	2,584,046	11		
Retail	2,537	12,268	10,349	0	0	25,154	270,755	Ground		
Office	0	0	0	0	9,500	9,500	102,257	4		
Hotel	9,304	0	0	0	10,559	19,863	213,803	5		380
Health centre	0	0	7,291	0	0	7,291	78,480	3		
Education	0	0	2,510	0	0	2,510	27,017	2		
East parking	16,560	0	0	0	0	16,560	178,250	6	591	
West Parking	0	0	0	0	97,239	97,239	1,046,665	7	3,473	
Total	33,297	102,843	88,672	76,073	117,298	418,183	4,501,275	n/a	4,064	380

- 1) All figures are approximate.
- 2) All areas are Gross External Area (GEA).
- 3) Parking figures does not include on-street or residential parking.
- 4) Parking spaces are based on conventional multi-storey parking and are calculated assuming 28m² gross per space.
- 5) The hotel rooms in Zone 1 are based on 60m² gross/room
- 6) The hotel rooms in Zone 5 are based on 47m² gross/room

	(m ²)	(ft ²)
Plot area	131,652.00	1,417,088.96
Site area	(34.15 Ha) 341,498.00	3,675,850.32

Plot/site ratio	39%
------------------------	------------

- General Notes**
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01	15.06.07	Concept Design Iteration 02	
00	03.04.07	Concept Design Iteration 01	
Rev	Date	Reason For Issue	Chk

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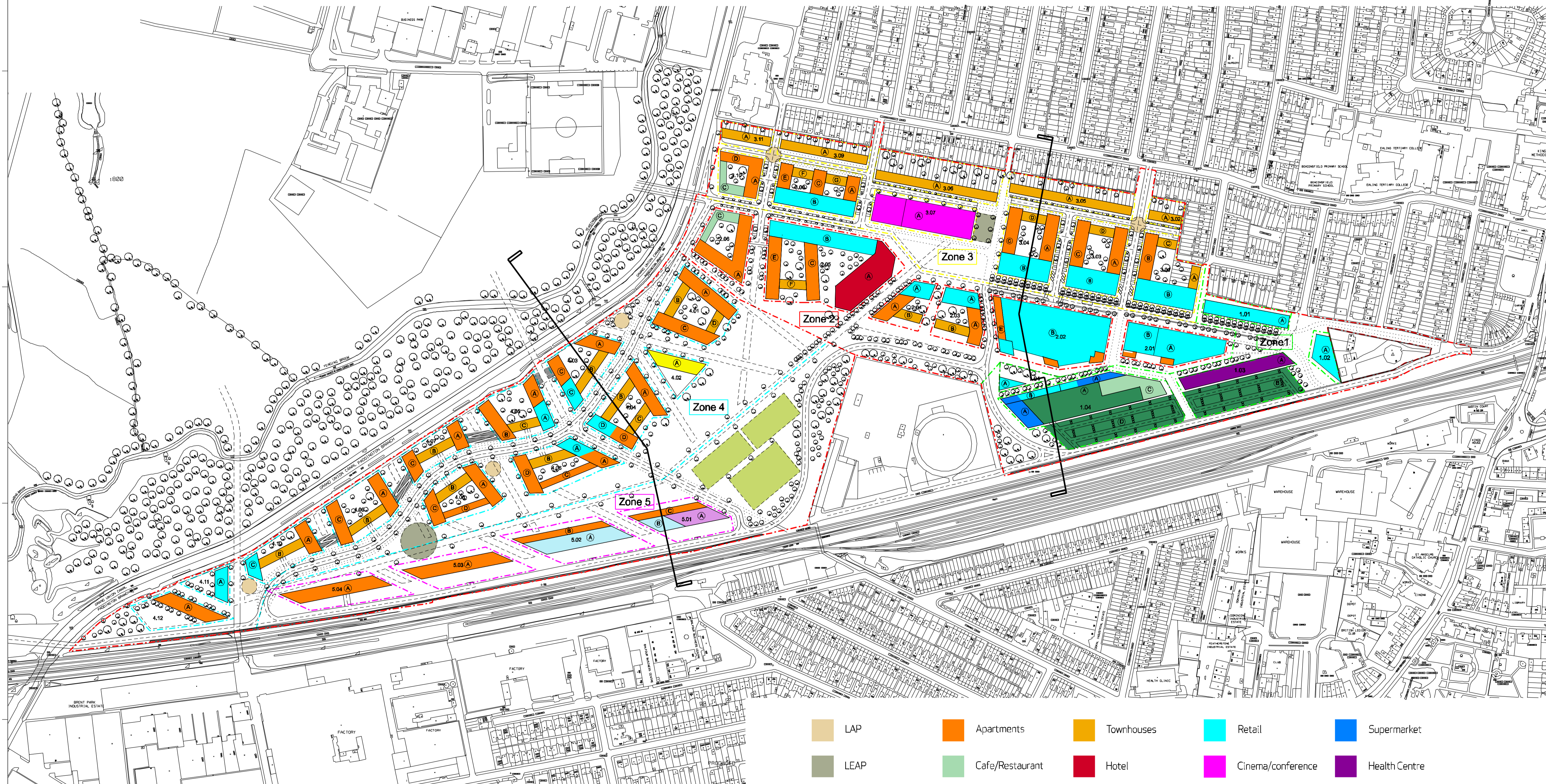
Client
**National Grid Property /
 Castlemore Securities Limited**



Project
Southall Gasworks Masterplan

Drawing Title
Ground Floor Site Plan

Scale	Paper Size	Date
1: 2500	A1	03.04.07
Project No.	Draw No.	Rev. No.
0317	A1001	01



LAP	Apartments	Townhouses	Retail	Supermarket
LEAP	Cafe/Restaurant	Hotel	Cinema/conference	Health Centre
NEAP	Education	Light Industry	East Parking	West Parking
			CHP	

317 Southall Gasworks Masterplan

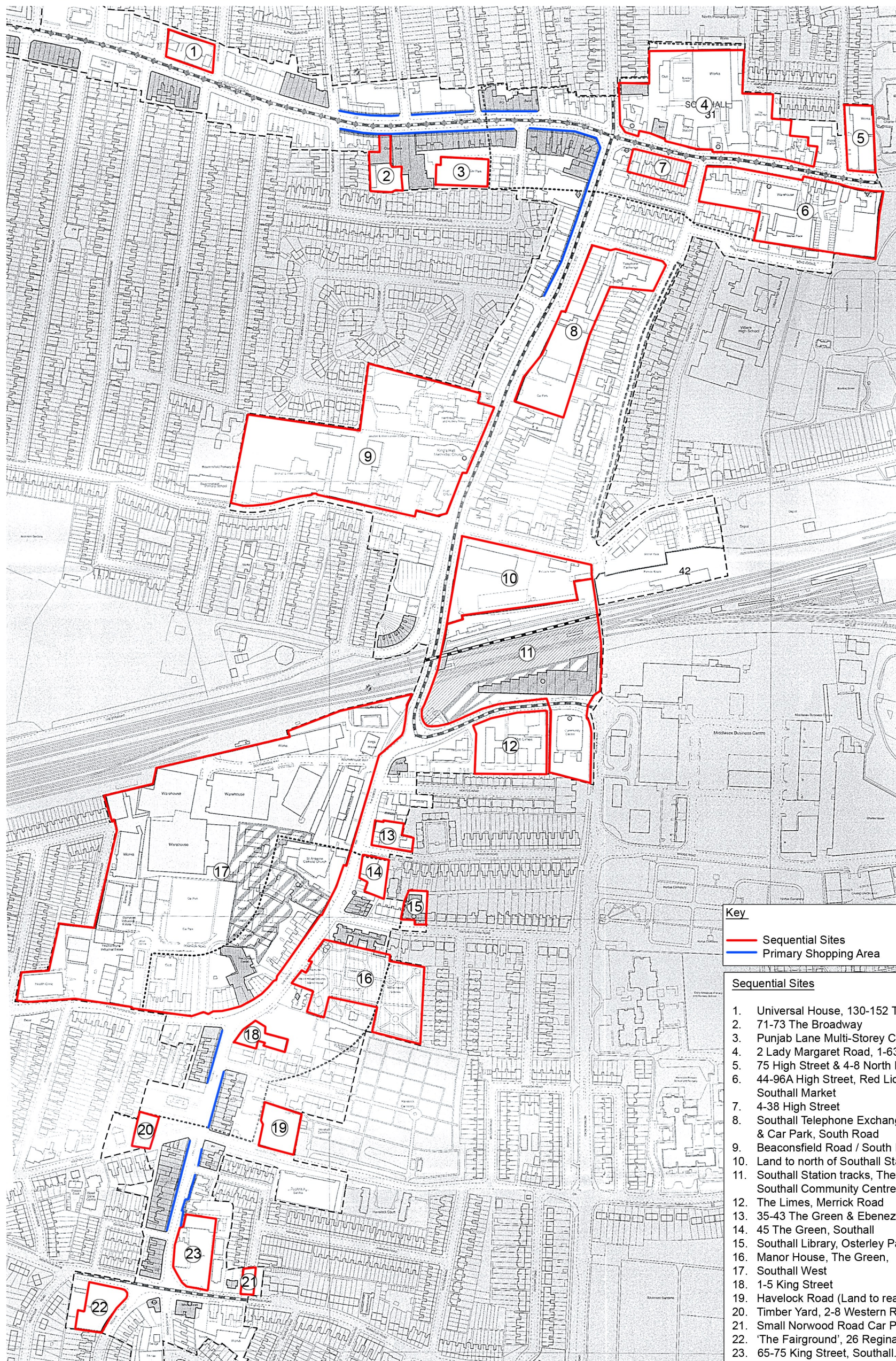
Gross area overview

15-Jun-07

page 1/3

	Zone 1 GEA (m ²)	Zone 2 GEA (m ²)	Zone 3 GEA (m ²)	Zone 4 GEA (m ²)	Zone 5 GEA (m ²)	Total GEA (m ²)	Total GEA (ft ²)	Max. no. of storeys	Indicative no. no. of units	Indicative no. parking spaces	Indicative no. hotel rooms
Apartments	13,318	80,907	41,684	120,650	17,165	273,724	2,946,338	Ground + 10	3,298		
Townhouses	0	3,802	20,295	16,249	0	40,346	434,280	Ground + 3	267		
Retail	3,127	10,613	6,364	2,621	0	22,725	244,610	Ground			
Supermarket	6,304	0	0	0	0	6,304	67,856	1			
Café/Restaurant	1,247	1,833	502	0	0	3,582	38,556	Ground			
Hotel	0	15,572	0	0	0	15,572	167,615	Ground + 8			260
Cinema/conference	0	0	3,790	0	0	3,790	40,795	Ground + 1			
Health centre	3,812	0	0	0	0	3,812	41,032	Ground + 1			
Education	0	0	0	2,631	0	2,631	28,320	Ground +2			
Light Industry	0	0	0	0	2,327	2,327	25,048	Ground			
East parking	12,322	0	0	0	0	12,322	132,633	Ground		501	
CHP	0	0	0	0	903	903	9,720	Ground			
Total	40,130	112,727	72,635	142,151	19,492	387,135	4,167,082	n/a	3,565	501	260

- 1) All figures are approximate.
- 2) All areas are Gross External Area (GEA).
- 3) Parking figures does not include on-street or residential parking.
- 4) The hotel rooms in Zone 2 are based on 60m² gross/room
- 5) Light industry figures within zone 5 are footprints of 5.01 and 5.02 only and do not include mezzanines
- 6) Education area based on 2 levels of 4.02 from zoning plan and includes playground fronting park.



Key

- Sequential Sites
- Primary Shopping Area

- Sequential Sites**
1. Universal House, 130-152 The Broadway
 2. 71-73 The Broadway
 3. Punjab Lane Multi-Storey Car Park
 4. 2 Lady Margaret Road, 1-63 & rear of 5-35 High Street
 5. 75 High Street & 4-8 North Road
 6. 44-96A High Street, Red Lion Public House & Hotel, Southall Market
 7. 4-38 High Street
 8. Southall Telephone Exchange, Cambridge Road & 31-57 & Car Park, South Road
 9. Beaconsfield Road / South Road
 10. Land to north of Southall Station
 11. Southall Station tracks, The Arches Business Centre and Southall Community Centre, Merrick Road
 12. The Limes, Merrick Road
 13. 35-43 The Green & Ebenezer Gospel Hall, Kingston Road
 14. 45 The Green, Southall
 15. Southall Library, Osterley Park Road
 16. Manor House, The Green,
 17. Southall West
 18. 1-5 King Street
 19. Havelock Road (Land to rear of St John's Church)
 20. Timber Yard, 2-8 Western Road
 21. Small Norwood Road Car Park, Norwood Road
 22. 'The Fairground', 26 Regina Road / Montague Way
 23. 65-75 King Street, Southall.



Project:
Southall Gas Works

Title:
Sequential Assessment

Date:	09.11.07	Scale:	NTS	Rev.:	
Job No	JLI0719	Drawn:	MB	Checked:	JM

Figure No:
JLI0719/01

WEST LONDON RETAIL NEEDS STUDY

Cinema Gap Analysis

KEY

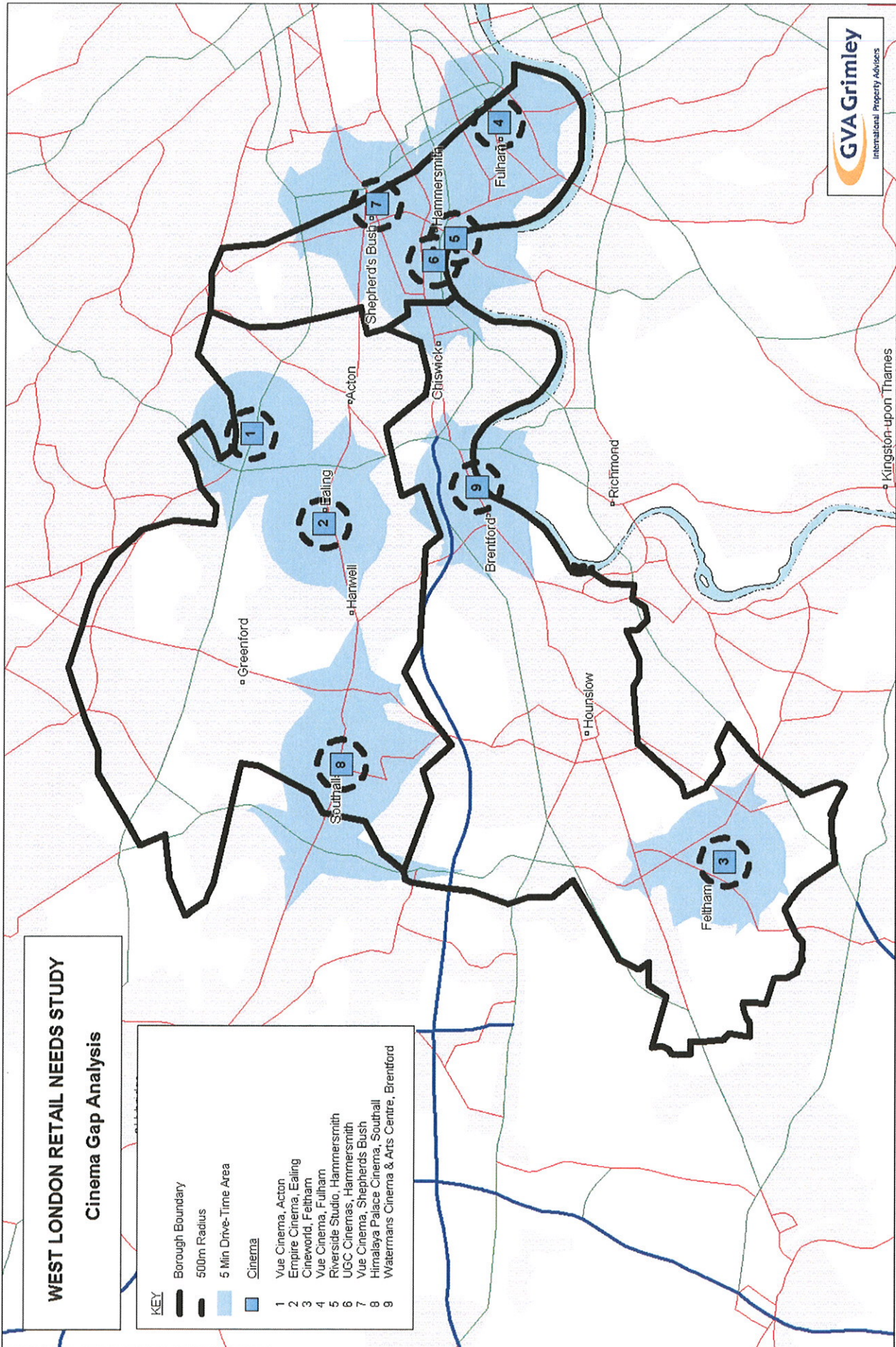
Borough Boundary

500m Radius

5 Min Drive-Time Area

Cinema

- 1 Vue Cinema, Acton
- 2 Empire Cinema, Ealing
- 3 CineWorld, Feltham
- 4 Vue Cinema, Fulham
- 5 Riverside Studio, Hammersmith
- 6 UGC Cinemas, Hammersmith
- 7 Vue Cinema, Shepherds Bush
- 8 Himalaya Palace Cinema, Southall
- 9 Watermans Cinema & Arts Centre, Brentford



National Grid Property Limited

Beyond Green

Capita Lovejoy

Cyril Sweett

Hakes Associates

Hunt Dobson Stringer

Make

Marks Barfield Architects

PPS Group

RPS

Savell Bird & Axon

Savills

White Young Green