

Ickenham Road, Ruislip, HA4 7DR

Planning and Retail Statement for
Lidl Great Britain Limited
February 2025
Our Ref: 22-00213



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Quality Assurance

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2015.

We confirm that the undersigned is an appropriately qualified and experienced Chartered Planner experienced in the commercial property sector.

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1 INTRODUCTION

- 1.1 This Planning and Retail Statement ('PRS') has been prepared by Rapleys LLP ('Rapleys'), on behalf of Lidl Great Britain Limited ('Lidl') and is submitted in support of a full planning application submission for the erection of a discount foodstore (Use Class E) with access, parking, landscaping and other associated works at Ickenham Road, Ruislip. A Site Location plan is attached at **Appendix 1**.
- 1.2 This Statement addresses relevant planning and retail issues affecting the site through the consideration and assessment of the proposal against key national and local planning policies and other material considerations. It also provides evidence of the unique nature of the Lidl discount operation and its complementary role to mainstream convenience retailers, by identifying relevant appeal decisions where this has been demonstrated.
- 1.3 The Statement should be read in conjunction with the following accompanying documents submitted as part of this pre- application in support of the development proposals, namely:

Document	Prepared By
Application Drawings	KLH Architects
Design and Access Statement	Rapleys LLP
Statement of Community Involvement	Terrapin Group
Delivery and Service Management Plan	Cora IHT
Transport Assessment	Cora IHT
Travel Plan	Cora IHT
Flood Risk Assessment and Water Cycle Study	Cora IHT
Detailed Landscape Proposals	BEA Landscape
Townscape & Visual Appraisal	BEA Landscape
Biodiversity Net Gain Statement & Assessment	Biodiverse Consulting
Biodiversity Metric	Biodiverse Consulting
Preliminary Ecological Appraisal	Biodiverse Consulting
Lighting Plan	Signify
Noise Impact Assessment	Acoustic Consultants
Arboricultural Report & Impact Assessment	AWA Tree Consultants
Air Quality Assessment	Syntegra
Heritage Assessment	Border Archaeology
Energy Usage & Sustainability Statement	DDA
Planning Fire Safety Strategy	BB7

- 1.4 The submission documents conclude that the proposed development is acceptable and should be supported in planning and retail terms. Therefore, planning permission should be forthcoming.
- 1.5 Against this background, the content of this Statement has been set out as follows:

1. Introduction;
2. Site and Surroundings;
3. Consultation
4. Proposed Development;
5. The Lidl Operation;
6. Planning Policy Context;
7. Sequential Site Assessment;
8. Retail Impact Assessment;
9. Planning Assessment; and
10. Summary and Conclusions.

2 SITE AND SURROUNDINGS

The Site and Surroundings

- 2.1 The site of the proposed development, which measures approximately 0.646 ha, comprises a public house (closed in December 2023) with a hotel function and car park, located on the north-western side of Ickenham Road, on the corner with Sharps Lane in Ruislip.
- 2.2 The site incorporates the Local Listed War Memorial (Spitfire replica) and is located within the Ruislip Village Conservation Area. The surrounding area is predominately residential in all directions, with a roundabout junction located to the south of the site.

Access

- 2.3 Access is from a modified access point of Ickenham Road (B466), located to the south-west of the site. Pavements are found along both sides of Ickenham Road and Sharps Lane.
- 2.4 A bus stop bounds the site to the south-east, with three bus stops within 100m of the site. West Ruislip Railway Station is located approximately 0.4 miles to the west of the site.

Site Constraints

- 2.5 The site falls within Flood Zone 1 and within an area with low risk for surface water flooding.
- 2.6 The site is within the Ruislip Village Conservation Area and hosts a Locally Listed War Memorial (Spitfire Memorial). Additionally, there are two listed buildings within 100m south of the site, the White Bear Public House (Grade II) and the Orchard Cottage (Grade II).

Planning History

- 2.7 A search of Hillingdon Council's online planning portal has revealed the following planning applications, which are deemed to be of relevance to the proposed development: -

REFERENCE	DESCRIPTION	DECISION
23164/A/77/0875	Alterations to elevation.	Approved 08/09/1977
23164/F/86/2198	Erection of a single-storey front extension.	Approved 02/02/1987
23164/J/88/2592	Erect of a 2-storey rear extension to form 24 room hotels with associated car parking.	Refused 17/07/1989
23164/M/92/0336	Erection of a single-storey rear extension and internal alterations (involving demolition of outbuildings)	Approved 29/04/1992
23164/APP/2000/1680	Installation of a full-size replica spitfire aircraft in front garden.	Approved 25/08/2000
62963/APP/2007/3884	Erection of two storey rear extension to provide 14 bedrooms and conversion on first floor to provide 10 bedrooms to create a 24-bedroom hotel with restaurant at ground level (including alteration to existing façade).	Approved 17/10/2008
62963/ADV/2015/65	Installation of 3 x externally illuminated fascia signs, 4 x externally illuminated standalone signs and 1 x internally illuminated menu light box.	Approved 18/02/2016

3 CONSULTATION

- 3.1 The NPPF outlines the need of effective consultation as part of the development process in association with the preparation of planning applications. A summary of the pre-application consultation undertaken by Lidl is provided below.

Hillingdon Council Pre-Application Consultation

- 3.2 A pre-application advice request was submitted to Hillingdon Council on 24th July 2024. The pre-application meeting with Officers took place on 11th September 2024, and the written pre-application advice was received on 21st October 2024.

Transport for London Highways Pre-Application Consultation

- 3.1 Cora IHT has submitted a pre-application enquiry with Transport for London. At the time of writing, a meeting has not yet taken place. A full analysis of the consultation response will be submitted within an updated Planning and Retail Statement and Statement of Community Involvement, as part of the planning application submission.

Hillingdon LLFA Pre-Application Consultation

- 3.2 Cora IHT has submitted a pre-application to Hillingdon LLFA. At the time of writing, the meeting has not yet taken place. A supplementary assessment of the consultation response will be reported within an updated Planning and Retail Statement and Statement of Community Involvement, as part of the planning application submission.

Public Consultation

- 3.3 A public consultation with the nearest residents and local residents organisation was undertaken via a leaflet drop which included a dedicated email address, online feedback form, freepost response and a telephone hot line. In addition, a drop-in event with the residents took place on 25th November 2024. Further details are provided in the Statement of Community Involvement.

4 PROPOSED DEVELOPMENT

- 4.1 This application seeks planning permission for the erection of a discount foodstore (Use Class E), with access, parking, landscaping and other associated works at Ickenham Road, on the corner with Sharps Lane in Ruislip.
- 4.2 The proposed foodstore, located within the western part of the site, will have a Gross Internal Area (GIA) of 1,825 sqm, of which 1,212 sqm will be sales area (or 'net sales area'). The sales area will incorporate an 80:20 split between convenience and comparison floorspace, meaning that around 970 sqm will be dedicated to convenience retail and 242 sqm will be used for comparison retail. The remaining floorspace will comprise 353 sqm of warehouse floorspace; and 260 sqm of ancillary space, which will comprise customer toilets, an in-store bakery, staff welfare facilities, ancillary office space and storage / utility space.
- 4.3 As part of the development proposals, the Locally Listed Spitfire Memorial will be relocated slightly to the south of the site, located within a designated memorial garden including benches and heritage information boards.
- 4.4 The proposed development will comprise a total of 72 car parking spaces, comprising:
- 46 'standard' parking spaces;
 - 4 accessible parking bays;
 - 3 enlarged bays
 - 3 parent & child spaces;
 - 2 'rapid' electric vehicle ('EV') bays; and
 - 14 'passive' spaces (for future EV charging spaces).
- 4.5 The accessible parking bays and the parent & child spaces will be located close to the store entrance and trolley bay. The location of these spaces promotes safe and convenient access for those with additional access requirements.
- 4.6 Parking facilities will also be provided for cyclists, in the form of 12 Sheffield style bike stands beneath the canopy along the south-eastern elevation, offering secure parking for 24 short-stay cycles. Additionally, provision for 12 long-stay cycles are provided next to the short-stay cycle bays.
- 4.7 A shopping trolley bay for the Lidl store will be provided under the canopy close to the store entrance on the eastern elevation of the store, to allow easy access to shopping trolleys for all customers.
- 4.8 A dedicated delivery bay will be delivered along the northern elevation of the foodstore. This will enable deliveries on the site to be made safely and efficiently, with minimal disruption to customers. The delivery vehicles will drive onto the site in forward gear and line up with the delivery bay, before reversing into the bay, dropping off goods directly into the warehouse area and driving off the site, again in forward gear. The loading bays for the storage unit are adjacent to the delivery bay for the Lidl foodstore to minimise conflict with customer vehicular and pedestrian traffic.
- 4.9 Vehicular access to the site, for customers and servicing, will be provided through a modified access point off Ickenham Road which has been moved southwards in response to pre-application consultation feedback. Pedestrian access to the site is proposed via the southern boundary of the site, adjacent to Ickenham Road.
- 4.10 The proposed development will also be supported by landscaping, which will comprise trees, shrub planting and other landscaping across the site. This will ensure that the site is visually appealing and soften the visual impact of the store. The proposal also includes a 'memorial' garden centred around the Spitfire memorial with benches and information boards to enhance the appreciation of the memorial, its significant wartime association with the Battle of Britain and its local connection to the Orchard hotel.
- 4.11 The submitted Design and Access Statement details the aesthetic appearance of the proposed development. In addition, full details of the proposed development are presented on the drawings accompanying the submission, including the Proposed Site Layout Plan, which can be found at **Appendix 2**.

5 THE LIDL OPERATION

5.1 Full details of the proposed development are presented in the plans accompanying the submission and addressed in detail below.

5.2 This section provides an overview of the Lidl retail operation, including the position of the company within the UK retail market and its key trading characteristics.

Position Within the Market

5.3 Lidl commenced trading in the UK in November 1994 and since that date has grown to become a substantial presence in the convenience retail market, with over 960 stores currently trading nationwide. [The Kantar Worldpanel Grocery Market Share](#) data found that as of December 2024, Lidl was the sixth largest convenience retailer in Great Britain, with 7.3% of the market share.

Discount Format

5.4 The Lidl retail philosophy is centred on simplicity and maximum efficiency at every stage of the business, from supplier to customer, enabling the company to sell high-quality own brand products at the lowest prices. It is this format that has resulted in Lidl being classified by retail research company Verdict as a 'deep' or 'hard' discounter.

5.5 The "deep discount" sector includes both Lidl and Aldi. This sector also included Netto, which returned to the UK market in 2014. However, in July 2016, the company announced that they would withdraw from the UK market by August 2016. 'Deep discounters' concentrate on selling a limited range of primarily own brand goods at extremely competitive prices. These retailers are therefore distinct from the 'mainstream' convenience retailers such as Tesco, Asda, Sainsbury's and Morrisons in the offer that they provide to shoppers.

5.6 Lidl is able to offer high-quality products at low prices through specific trading characteristics. This enables the company to achieve significant economies of scale that can then be passed on to the customer in the form of highly competitive prices. Other factors that enable Lidl to offer consistently low prices include the format of its stores and the approach taken to the display and sale of products.

5.7 The fact that Lidl provides a distinct offer to the main convenience retailers was recognised by the Competition Commission in its 2008 'Grocery Market Investigation'. The Glossary to the investigation report refers to Lidl as 'Limited Assortment Discounter' or 'LAD', which is defined as:

"Limited Assortment Discounters (i.e. grocery retailers offering noticeably lower prices than a conventional supermarket but which stock a limited range of products)."

5.8 Further reference is made to LAD stores at paragraph 3.3, page 30 of the investigation:

"Limited Assortment Discounters (LADs) carry a limited range of grocery products and base their retail offer on selling these products at very competitive prices. The three major LADs in the UK are Aldi, Lidl and Netto. Each of Aldi, Lidl and Netto carries in the region of 1,000 to 1,500 product lines in stores ranging from 500 to 1,500 sqm (Stores of a similar size operated by a large grocery retailer generally carry around 10,000 - 15,000 products.)"

5.9 Paragraph 4.80, page 70 of the investigation goes on to state that due to the limited number of products carried by LADs they are not close substitutes for other foodstores of a comparable size (i.e. they are different):

"The limited number of products carried by LADs stores means that these stores are not close substitutes for similarly-sized stores operated by CGL (Co-op), M&S, Sainsbury's, Somerfield and Tesco. In particular, we note that Aldi, Lidl and Netto stores typically sell fewer than 1,000 products. In comparison, large grocery retailers generally sell around 5,000 to 10,000 products in stores in the same size range as those operated by LADs (i.e. 500 to 1,400 sqm). The results of our entry analysis also show that Aldi, Lidl and Netto stores are not close substitutes for the stores of large grocery retailers."

5.10 The findings of the Competition Commission's 2008 investigation therefore confirmed that Lidl does provide a different offer to the main food retailers.

5.11 This difference has also been acknowledged by the Secretary of State and Planning Inspectors in a number of appeal decisions relating to Lidl stores. In relation to a Secretary of State decision in the London Borough of Merton (APP/T5720/V/04/1171394), the Planning Inspector in his report concluded that:

"283. The Lidl offer is materially different to that provided by the mainstream food retailers".

5.12 Further to this, it was recognised by an inspector when approving a new store in New Addington, Croydon (APP/L5240/A/07/2052053) that:

"17. The Lidl offer is materially different to that provided by the main food retailers and as a result ... would meet a qualitative need by extending consumer choice. Furthermore, it would add a new dimension to competition within the area".

5.13 As can be evidenced by the above decisions, the different offer provided by discount foodstores to the likes of Tesco and Sainsbury's is now widely recognised and accepted.

Limited Product Range

5.14 Aside from the difference in pricing from the main convenience retailers, another characteristic of the Lidl business model, as already highlighted in the Competition Commission's findings above, is that Lidl carry a comparatively narrow range of primarily own brand products (around 90% of all products in store).

5.15 The majority of Lidl product lines consist of basic convenience goods, with a few recognised brands sold, in addition to a limited range of fresh fruit and vegetables and also pre-packed meats and frozen food stuffs. Lidl aims to keep the shopping experience simple for its customers and operates a 'no frills' policy by avoiding unnecessary packaging and presentation, including a basic store fit-out, all of which contributes to keeping the cost of products low.

5.16 Non-food items are limited to around 15-20% of floorspace in store. The non-food offer is mainly focused on household cleaning and health and beauty products. Lidl stores do receive a twice weekly delivery of non-food 'specials', which can range from garden equipment and small items of furniture to flat screen TVs. These are sourced to ensure competitive prices with the constant rotation of products. These items are provided on a 'when it's gone, it's gone' basis and owing to the limited and constantly changing offer, the potential for impact upon other retailers is negligible.

Not the Full Retail Offer

5.17 Lidl stores also differ from other convenience retailers by not offering any of the following products or services:

- Fresh meat and fish counter;
- Café/restaurant;
- Delicatessen/cheese counter;
- Hot food counter;
- Home Delivery/click and collect;
- Pharmacy;
- Dry-cleaning service;
- Post Office services;
- Photographic shop; and
- Mobile phone shop.

5.18 Lidl does not offer any of the above products/services because these do not fit with the company's retail concept and business model. Lidl has a successful, proven format that works, and there is no intention to change it. The introduction of any of the above could have an adverse impact on the prices offered to customers.

- 5.19 As a consequence of the Lidl business model, its customers tend to purchase part of their main grocery shop (i.e., basic staples) in store, taking advantage of the low prices, but then visit other retailers to purchase luxury food or more specialist items. This, combined with the fact that Lidl does not offer the products and services listed above that are found in many of the main convenience retailers as well as smaller local independents, means that its stores complement existing retail provision, while providing additional opportunity and choice for shoppers.

Shorter Trading Hours

- 5.20 The standard opening hours for Lidl stores are also more limited than the main convenience retailers, as well as smaller independent convenience retailers. Generally, Lidl stores open in England for a core period of between 08.00–22.00 Monday to Saturday (inclusive of Bank Holidays) and 10.00–16.00 on Sundays.
- 5.21 The standard opening hours of Lidl stores are therefore more limited than other retailers, which is another factor underlining that Lidl do not compete to a significant degree with other retailers, in particular, smaller convenience retailers, many of whom offer additional services and stay open for much longer periods.

Store Format

- 5.22 Lidl has an established store format that is integral to the success of its business model. The minimum store size (outside of London) that is required by Lidl for its operational requirements is circa 2,300 sqm gross external area (GEA). This equates to a net sales area of approximately 1,300 to 1,600 sqm Gross Internal Area. Typically, Lidl require all elements of their foodstores to be set out over a single level (unless there are unusual or exceptional circumstances). There are a number of reasons why this size of store is required.
- 5.23 A single level store of c.2,300 sqm Gross External Area allows for pallets to be easily moved directly from the delivery bay and placed in the sales area. This cannot be achieved in the same way in smaller stores, resulting in the need to break pallets down and stack more products on shelves, which consequently increases staff costs. This therefore makes it more difficult for Lidl to pass cost savings on to its customers, thereby impacting on its ability to deliver the benefits of discount retailing.
- 5.24 In addition, the standard store format has been purposefully designed in order to provide mobility impaired customers, the elderly and those with small children, space to move through the store easily. Lidl also place bulky goods on the sales floor to ensure that easy access to these items is maintained for all customers.
- 5.25 It has been recognised by the Secretary of State and Planning Inspectors that a single level retail operation is an essential part of the Lidl business model and that consequently 'disaggregation' (breaking stores down into convenience and comparison elements) cannot be achieved without the benefits of the discount format being lost. In this respect, in relation to a Lidl scheme in Oxford (APP/G3110/A/04/1171310L05/1195688) the Inspector noted (paragraph 82) that:

"The fact that Lidl only sell a limited range of goods means there is no realistic scope for disaggregation. Lidl stores cannot be broken down into constituent parts..."

- 5.26 Major deviations from the set store format will incur significant additional costs, both in terms of initial build cost and operation maintenance. This can severely impact on the feasibility of a Lidl scheme; and prevent a store from being financially viable whilst providing customers with the discounted offer they expect. As such, significant deviation from the store model is only considered acceptable in very special circumstances.

Local Catchment

- 5.27 Lidl stores serve a relatively compact catchment area and are intended to provide a local shopping facility. The locational strategy of Lidl is for stores in urban areas, to serve an area that broadly equates to a 0-5-minute drive-time of the site. Owing to its limited offer, people do not tend to travel long distances to shop at Lidl. The catchment has regard to the nature of the settlement and surrounding area, the location of existing food retail provision within the catchment and consumer travel patterns.

- 5.28 As stated above, many customers use Lidl stores to purchase part of their main grocery shop (i.e. basic staples), often on foot, taking advantage of the low prices, but then visit other retailers to purchase luxury food or more specialist items that are not offered at Lidl (e.g. fresh fish). In addition, many Lidl customers also continue to visit smaller independent convenience stores close to their homes for top-up/basket shopping (i.e., buying a pint of milk or a loaf of bread) as well as to use services that are not provided by Lidl (e.g. dry cleaning, Post Office etc).

Employment Opportunities

- 5.29 The proposed Lidl store will employ up to 40 staff in store. Lidl has a policy of employing local people from all backgrounds to work in their stores. This allows for a short commute to work and for staff to potentially work at short notice. The company is an equal opportunities employer with a strong social inclusion policy. The following extract is taken from Lidl's employee handbook, which sets out the company's equal opportunities stance:

"Lidl is an equal opportunities employer. We wish to ensure that employees are treated, trained and promoted, and job applicants are selected on the basis of their respective skills, talents, performance and experience, without reference to their sex, marital status, race, colour, nationality, ethnic origin or disability. Whilst the company strives to realise these principles, it is your responsibility to ensure that they are applied in practice. We will not tolerate any form of harassment and we will seek to ensure that your working environment is free from prejudice. Harassment at work is unlawful."

- 5.30 Lidl is committed to investing in their staff and consistently offer one of the highest levels of pay in the UK supermarket sector. As of 1 June 2024, pay rises for store and warehouse staff saw entry-level hourly rates rise to £12.40 (£13.65 within the M25), which is substantially higher than the National Living Wage and National Minimum Wage. Lidl staff also receive other benefits, such as a policy of no zero-hour contracts; a generous holiday package; and an in-store discount.
- 5.31 Lidl also offer opportunities for career progression, through many different career paths and opportunities within the retail sector. These include managerial and administrative positions in addition to positions such as store assistants and cashiers. The company also runs comprehensive management development and training programmes, enhancing skills of staff and maximising staff retention.
- 5.32 When setting up a new store, Lidl would bring in a manager from another store that ideally has links with the area. This is vital to provide the necessary experience and leadership during the training period of the new store staff. It is then the responsibility of the store manager and district manager to recruit and train the necessary numbers of staff prior to store opening. New staff are recruited from the local community using a variety of methods, including local newspaper advertisements, Job Centre advertisements and open days.

Deliveries

- 5.33 Lidl products are purchased throughout Europe and then packaged and distributed directly to the relevant Regional Distribution Centre (RDC), of which there are currently 13 in the UK, for onward distribution to its stores across the UK.
- 5.34 Lidl is mindful of the need to minimise any disturbance to neighbouring residents and landowners. To assist in achieving this, each store has only one or two dedicated deliveries per day. Each delivery is undertaken by one delivery vehicle, which carries all of the necessary products for the store, including freezer and chilled products. Furthermore, during these deliveries the same delivery vehicle picks up any store waste, which is stored internally in the store warehouse. These delivery and waste pickup practices minimise disruption on the site and in the surrounding area.
- 5.35 Minimal noise is produced during deliveries, as delivery drivers are required to turn their engines off during the delivery; and the freezer and chilled products are carried using individual temperature-controlled units, which can be loaded onto the vehicle, meaning that there are no noisy air conditioning units fitted to the delivery vehicles. New stores (such as that proposed) also feature graded ramps in the delivery bay and manual dock levellers, negating the need for noisy scissor or tail lifts. The total unloading time for deliveries is approximately 45 minutes.

Sustainability Measures

- 5.36 Lidl implement a variety of measures to minimise the environmental impact of its stores and to contribute toward sustainability objectives, including:
- Limiting deliveries to a maximum of two per day. Delivery vehicles are also used to remove waste from the store on their return journey to the RDC where the waste/recyclable material is sorted and managed centrally. This also helps to reduce vehicle trips and emissions;
 - Lidl lead the sector in terms of recycling and waste to landfill reduction by recycling all paper/cardboard and plastic waste produced by the store. This means that over 80% of all waste produced in store is recycled;
 - Lidl stores include highly efficient mechanical and electrical systems, which recover waste heat from the combustion process. All heating is regulated by sensors;
 - New Lidl store typically have roof mounted photo-voltaic arrays ensuring that a large proportion of the anticipated electricity demand for the store comes from a renewable source;
 - Lidl stores use a manual dock leveller for deliveries, reducing noise emissions and energy use;
 - Lidl car parks provide 2 rapid charging vehicle spaces with further passive provision for future EV roll out;
 - All Lidl stores are fitted with a 'Building Management System' incorporating movement sensors, Lux meters and thermostatic controls. This ensures that the back of house areas of the store are only lit when people are using them, that external lighting is only used when required and that the temperatures of the various areas within store are maintained at the correct levels. Energy efficient LED lighting is used and lighting within the sales area is cutback to one third before and after trading hours;
 - Water consumption is carefully monitored, and flow control devices and water meters are fitted in all stores; and
 - Car park lighting is designed in accordance with Lidl's 'Dark Sky' policy with light fittings carefully specified in order to keep light spill beyond the site boundary to a minimum, with Lux and timer controls fitted.
- 5.37 Lidl also produce and implement Travel Plans to promote sustainable transport choices. A Travel Plan has been submitted as part of the application.
- 5.38 Lidl communicate to staff and customers on a continual basis and encourage all stakeholders to implement environmentally friendly practices where possible.

Secured by Design and Equalities Act

- 5.39 Lidl design their stores and sites to minimise anti-social behaviour and crime. Lidl provide open and well-lit schemes to deter criminal activity. Lidl will, if required, fit CCTV internally and/or externally to ensure the safety of staff, customers and property.
- 5.40 Lidl provides its customers with disabled car parking spaces that comply with the latest Equalities Act Regulations, ensuring all users of the store can manoeuvre as simply as possible. Lidl car parks are designed with the customer in mind to ensure that cars can pass easily into and around the car park. Disabled and parent and child spaces are positioned near the store entrance, in order to provide shorter walking distances from cars to the store.

SUMMARY

- 5.41 The key trading characteristics that distinguish Lidl from the mainstream convenience retailers and smaller independent retailers are therefore as follows: -

1. **Restricted number of product lines** – Lidl is sells a limited range of predominantly own brand goods, with customers visiting other stores for branded or luxury goods.
2. **Not the full retail offer** – Lidl does not provide the full retail offer. Only a limited range of comparison goods are sold and the constantly changing nature of ‘non-food specials’ ensures that any impact of other retailers is not constant and is limited. Lidl stores do not offer the range of services provided by the mainstream food retailers or smaller independent stores.
3. **Small store size and localised catchment** – Lidl stores do not draw customers from a wide area.
4. **Shorter trading hours** – Lidl stores are not open ‘all hours’ and so do not attempt to compete with 24 hour mainstream food retailer operations and the extended opening times of local convenience stores.

5.42 The above factors ensure that the trading impacts of new Lidl stores on existing retailers and centres are limited.

5.43 Lidl stores also bring substantial benefits to an area, including; new discount convenience retail options; new highly competitive retail employment opportunities; and a store which is designed and operated in a manner which seeks to minimise disruption and promote sustainability.

6 PLANNING POLICY CONTEXT

6.1 This section sets out the relative planning policy context of the proposed development at both a national and local level.

NATIONAL POLICY

6.2 National planning policy is set out within the National Planning Policy Framework (2024) (NPPF), which is supplemented by the National Planning Practice Guidance (NPPG).

6.3 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision taking this means:

- approving development proposals that accord with an up-to-date development plan without delay, or
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - the application of policies in this Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed, or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

6.4 Under decision-making, the NPPF sets out that *“early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties”*, with the *“the more issues that can be resolved at the pre-application stage”*, the greater the benefits.

6.5 Section 4 of the Framework (Decision-making) confirms that local planning authorities should approach decisions on proposed development in a positive and creative way by working proactively with applicants *“to secure developments that will improve the economic, social and environmental conditions of the area”*.

6.6 Section 6 of the Framework (Building a strong, competitive economy) states that *“significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”*.

6.7 Section 7 of the NPPF (Ensuring the vitality of town centres) sets out that policies and decisions should *“support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”*.

6.8 Section 9 of the NPPF (Promoting sustainable transport) expects development to promote sustainable access. Paragraph 116 further states that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”*.

6.9 In achieving well-designed places, section 12 of the NPPF confirms that good design is a key aspect of sustainable development and creates better places in which to live and work. Good design also helps to make development acceptable to communities.

6.10 Section 16 of the NPPF (Conserving and enhancing the historic environment) notes when considering the impact of a proposed development on the significance of a designate heritage asset, great weight should be given to the asset’s conservation.

LOCAL PLANNING POLICY

6.11 The adopted development plan for Hillingdon Council consists of the following: -

- London Plan (2021);
- Local Plan: Part 1 – Strategic Policies (2012); and
- Local Plan: Part 2 – Development Management Policies (2020).

- 6.12 The policy context of the site and the relevant planning policies are outlined below.
- 6.13 The site is understood to fall within the development boundary of Hillingdon and also falls within the Hillingdon Local Centre boundary.

London Plan (2021)

- **Policy GG1 (Building strong and inclusive communities)** indicates that planning and development must seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city.
- **Policy GG2 (Making the best use of land)** states that planning and development should create sustainable mixed-use spaces which make the best use of land through (*inter alia*); the reuse of brownfield land; the prioritisation of well-connected sites, which enable sustainable travel; intensification of land uses; and following a design-led approach.
- **Policy GG3 (Creating a Healthy City)** asserts that developments should aid in promoting active and healthy lifestyles; minimising adverse impacts on mental or physical health; and creating a healthy environment.
- **Policy GG5 (Growing a Good Economy)** seeks to conserve and enhance London's economy through numerous measures, including: maximising the potential of the city; diversifying the economy; increasing connectivity and accessibility; and reducing carbon emissions.
- **Policy GG6 (Increasing Efficiency and Resiliency)** sets out that development should; contribute to London's target to be a carbon neutral city by 2050; demonstrate resilience to climate change; create safe and secure spaces; and be integrated into the strategic and local infrastructure networks.
- **Policy SD6 (Town Centres and High Streets)** encourages the promotion and enhancement to the viability and viability of London's varied town centres.
- **Policy SD7 (Town Centres: Development Principles and Development Plan Documents)** states (*inter alia*) that a town centre first approach should be taken for development proposals involving 'main town centre' uses. In line with this, the policy sets out that proposals for main town centre uses in edge or out-of-centre locations should demonstrate that they are sequentially preferable; and be supported by an impact assessment, which demonstrates that there will not be significant adverse impact on neighbouring centres, where appropriate.
- **Policy SD8 (Town Centre Network)** confirms local and neighbourhood centres should focus on providing convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis.
- **Policy D3 (Optimising site capacity through the design-led approach)** sets out that All development must make the best use of land by following a design-led approach that optimises the capacity of sites. The policy also states that development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness; and facilitate active travel.
- **Policy D4 (Delivering Good Design)** requires design and access statements to be supported with development proposals.
- **Policy D5 (Inclusive Design)** asserts (*inter alia*) that development proposals should achieve the highest standards of accessible and inclusive design.
- **Policy D11 (Safety, Security and Resilience to Emergency)** requires that development proposals maximise the resilience of buildings and minimise physical risks, such as fire, terrorism and flood.
- **Policy D12 (Fire Safety)** affirms that all developments should achieve the highest level of fire safety; and all major developments should be supported by Fire Statements.
- **Policy D13 (Agents of Change)** states that development should follow the Agent of Change principle and minimise noise and potential other nuisances through good design, mitigation measures and sensible layout (distance, screening, sound proofing, etc...).
- **Policy D14 (Noise)** states that development proposals should manage noise through numerous means, including; avoiding significant adverse noise impacts; applying the Agent of Change principle; the separation of noise generating and noise sensitive uses; and the application of new technology which reduces noise.

- **Policy E9 (Retail, markets and hot food takeaways)** states that a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres.
- **Policy E11 (Skills and opportunities for all)** states that development proposals should support employment, skills development, apprenticeships, and other education and training opportunities.
- **Policy HC1 (Heritage, Conservation and Growth)** seeks for development proposals affecting heritage assets and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- **Policy HC7 (Protecting Public Houses)** sets out that applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.
- **Policy G1 (Green Infrastructure)** asserts (*inter alia*) that development proposals should include green infrastructure, which is linked to existing infrastructure.
- **Policy G5 (Urban Greening)** requires that major developments contribute to the greening of London by incorporating landscaping, green roofs, green walls and nature-based sustainable drainage. As guidance the policy suggests that local authorities seek a 0.3 Urban Greening Factor on commercial developments.
- **Policy G6 (Biodiversity and Access to Nature)** states (*inter alia*) that Sites of Importance for Nature Conservation (SINCs) should be protected; and development should seek to provide a biodiversity net gain.
- **Policy G7 (Trees and Woodlands)** requires that trees and woodland in London are protected, retained and maintained, particularly valuable and veteran trees.
- **Policy SI1 (Improving Air Quality)** aims to ensure that development proposals avoid; the further deterioration of existing poor air quality; the creation or extension of areas which exceed legal air quality limits; and an increase in risk to exposure to poor air quality. In avoiding unacceptable impacts on air quality, policy SI1 sets the requirement for development to be at least "Air Quality Neutral"; and for major developments to be supported by an Air Quality Assessment.
- **Policy SI2 (Minimising Greenhouse Gas Emissions)** asserts that major developments should be net carbon-zero and follow the be lean – be clean – be green – be seen hierarchy. The policy requires a minimum on-site reduction of at least 35% beyond Building Regulations, of which 15% should be achieved through energy efficiency measures for non-residential development. Policy SI2 further states that where net carbon-zero cannot be achieved developers must either provide a cash in lieu contribution; or identify an off-site alternative proposal where delivery is certain.
- **Policy SI3 (Energy Infrastructure)** sets out (*inter alia*) that major developments within the Heat Network Priority Areas should have a communal low-temperature heating system in line with the hierarchy outlined in the policy.
- **Policy SI4 (Managing Heat Risk)** outlines that development proposals should minimise the adverse impacts of the urban heat island effect and demonstrate how overheating will be reduced through the use of air conditioning in accordance with a set hierarchy.
- **Policy SI5 (Water Infrastructure)** requires that commercial developments achieve at least BREEAM 'excellent' in the 'Wat 01' category and incorporate measures such as smart metering, water saving and recycling measures. Moreover, the policy states that from a wastewater perspective sufficient infrastructure should be available and the mixing of surface and foul waste should be minimised.
- **Policy SI7 (Reducing Waste and Supporting the Circular Economy)** seeks to reduce waste and increase the level of re-use and recycling, in order to achieve this the policy sets a number of targets, including; the promotion of the circular economy; the reduction of waste production; and the reuse/recycling/recovery of 95% of building materials.
- **Policy SI12 (Flood Risk Management)** requires (*inter alia*) that development proposals minimise and mitigate against flood risk.
- **Policy SI13 (Sustainable Drainage)** aims for development to achieve greenfield run-off rates; prioritise green features over grey; and follow a set drainage hierarchy, which prioritises the use of collected rainwater.

- **Policy T1 (Strategic Approach to Transport)** requires all development to make the most effective use of land, reflecting its connectivity and accessibility, particularly through more sustainable means of transport.
- **Policy T2 (Healthy Streets)** aims to reduce the reliance on vehicular transport and increase the number of journeys taken by cycle and by foot, by creating safe and convenient active travel networks.
- **Policy T4 (Assessing and Mitigating Transport Impacts)** asserts that development proposals should demonstrate that the development can be served whilst ensuring that the transport network operates within capacity. Further, the policy requires that public transport, walking and cycling facilities are improved where necessary and unacceptable adverse impacts on the transport network are avoided.
- **Policy T5 (Cycling)** seeks to remove barriers to cycling and create a healthy environment for cyclists. As part of this vision, the policy sets that level of cycle parking required for each type of development.
- **Policy T6 (Car Parking)** declares that car-free development should be the starting point for all development; and confirms that all development should follow the maximum parking standards set out in Policies T6.1 – T6.5.
- **Policy T6.3 (Retail Parking)** sets out that to make the most efficient use of land, the starting point for assessing the need for parking provision at all new retail development should be the use of existing public provision, such as town centre parking.
- **Policy T6.5 (Non-Residential Disabled Persons Parking)** aims to ensure that all non-residential developments are served by an appropriate number of disabled parking bays, which meets the outlined design standards. For retail development, 6% of the total parking spaces should be dedicated disabled spaces, whilst 4% should be enlarged bays.
- **Policy T7 (Deliveries, Servicing and Construction)** requires (*inter alia*) that development facilitates safe, clean and efficient deliveries and servicing. The policy also requires development to be supported by Construction Logistic Plans; and Delivery and Servicing Plans in line with TfL guidance. The policy also requires that safe access for pedestrians and cyclists is prioritised and maintained at all times.

Hillingdon Local Plan: Part 1 – Strategic Policies (2012)

- **Policy E2 (Location of Employment Growth)** states the Council will promote development in highly accessible locations that delivers sustainable travel patterns and contributes to the improvement of existing networks to reduce emissions and impacts on air quality.
- **Policy HE1 (Heritage)** aims to conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape.
- **Policy E5 (Town and Local Centres)** asserts the Council will accommodate additional retail growth in established centres, in accordance with the conclusions of the latest evidence base.
- **Policy BE1 (Built Environment)** seeks to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods.
- **Policy EM1 (Climate Change Adaptation and Mitigation)** sets out climate change mitigation measures at every stage of the development process.
- **Policy EM6 (Flood Risk Management)** requires new development to be directed away from flood zones 2 and 3 in accordance with the principles of the NPPF.
- **Policy EM7 (Biodiversity and Geological Conservation)** encourages the provision of biodiversity improvements from all development, where feasible.
- **Policy EM8 (Land, Water, Air and Noise)** confirms all development should not cause a deterioration in the local air quality levels, ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated, and provide mitigation strategies regarding contaminated land.
- **Policy T1 (Accessible Local Destinations)** highlights the Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision.

Hillingdon Local Plan: Part 2 – Development Management Policies (2020)

- **Policy DMTC1 (Town Centre Developments)** states that the Council will support ‘main town centre uses’ where the development proposal is consistent with the scale and function of the centre.

Policy DMTC1 further states that the LPA expect proposals for ‘main town centre uses’ to demonstrate that there are no available or suitable sites in town centre where an edge of centre or out of centre location is proposed, using a sequential approach.

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

- **Policy DMTC2 (Primary and Secondary Shopping Areas)** asserts the Council will support the ground floor use of the premises for retail, financial and professional activities and restaurants, cafes, pubs and bars.
- **Policy DMHB1 (Heritage Assets)** confirms the Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation.
- **Policy DMHB3 (Locally Listed Buildings)** states the Council will take into account the effect of a proposal on the building’s significance and the scale of any harm of loss when considering planning applications.
- **Policy DHMB4 (Conservation Areas)** requires new development to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness.
- **Policy DHMB9 (War Memorials)** asserts the protection of war memorials and their wider settings, and there is a general permeation in favour of their retention in situ.
- **Policy DMHB11 (Design of New Development)** seeks for new buildings to be designed to the highest standards and incorporate principles of good design.
- **Policy DMHB12 (Streets and Public Realm)** sets out that development should be well integrated with the surrounding area and accessible.
- **Policy DMHB14 (Trees and Landscaping)** states all development will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
- **Policy DMHB15 (Planning for Safer Places)** confirms the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council’s latest guidance on Secured by Design principles.
- **Policy DMEI2 (Reducing Carbon Emissions)** sets out that all developments are required to make the fullest contribution to minimising carbon emissions in accordance with London Plan targets.
- **Policy DMEI7 (Biodiversity Protection and Enhancement)** asserts that the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement.
- **Policy DMEI10 (Water Management, Efficiency and Quality)** requires all new build developments to include a drainage assessment demonstrating that appropriate sustainable drainage systems have been incorporated in accordance with the London Plan Hierarchy.
- **Policy DMEI14 (Air Quality)** affirms that development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.
- **Policy DMCI14 (Retention of Existing Community Facilities)** asserts proposals involving the loss of an existing community facility will only be permitted if the redevelopment of the site would secure an over-riding public benefit.

- **Policy DMC17 (Planning Obligations and Community Infrastructure Levy)** states planning permission will only be granted for development that clearly demonstrates that there will be sufficient infrastructure of all types to support it.
- **Policy DMT1 (Managing Transport Impacts)** indicates development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.
- **Policy DMT2 (Highways Impacts)** states development proposals must ensure that safe and efficient vehicular access to the highway network is provided to the Council's standards and do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents.
- **Policy DMT5 (Pedestrians and Cyclists)** asserts that development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provide on the site connecting it to the wider network.
- **Policy DMT6 (Vehicle Parking)** requires development proposals to comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development address issues relating to congestion and amenity.

Supplementary Planning Documents

- 6.14 The Supplementary Planning Documents (SPD) relevant to the planning application include:
- Accessible Hillingdon (September 2017); and
 - Planning Obligations (July 2014).

SUMMARY

- 6.15 The proposal has been prepared considering these policies, as set out in the following sections of the Design and Access Statement. Additionally, the merits of the proposal are assessed regarding the relevant national and local policy considerations within the accompanying Planning and Retail Statement.

7 SEQUENTIAL SITE ASSESSMENT

- 7.1 This section sets out the applicant's approach to the sequential site assessment taking into consideration the 'edge-of-centre' location of the site in retail planning terms, and the requirements of national and local retail policy.
- 7.2 The NPPF at paragraphs 91 and 92 requires that the sequential approach to site selection be applied to all development proposals for main Town Centre uses that are not located in an identified centre and not in accordance with an up-to-date Development Plan.
- 7.3 Applications for main Town Centre uses should be located within a Town Centre, then in edge-of-centre locations, and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- 7.4 When considering edge-of-centre and out-of-centre proposals, preference should be given to accessible sites which are well-connected to the town centre. The NPPF further requires that applicants and Local Planning Authorities should demonstrate flexibility on issues such as format and scale so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.
- 7.5 Accordingly, given the site's out-of-centre location, a sequential site assessment has been undertaken. The proposal is assessed against local and national policy requirements below.

Methodology

- 7.6 The NPPG 'Town Centres' and retail' provides guidance on the application and interpretation of the sequential test.
- 7.7 The NPPG sets out how the sequential test should be used in decision making (Paragraph: 011 Reference ID: 2b-011-20190722).

"It is for the applicant to demonstrate compliance with the sequential test (and failure to undertake a sequential assessment could in itself constitute a reason for refusing permission). Wherever possible, the local planning authority is expected to support the applicant in undertaking the sequential test, including sharing any relevant information. The application of the test will need to be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites will need to be discussed between the developer and local planning authority at the earliest opportunity. The checklist below sets out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:

- with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. It is important to set out any associated reasoning clearly.
- is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.
- if there are no suitable sequentially preferable locations, the sequential test is passed.

In line with paragraph 90 of the National Planning Policy Framework, only if suitable sites in town centre or edge of centre locations are not available (or expected to become available within a reasonable period) should out of centre sites be considered. When considering what a reasonable period is for this purpose, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account.

Compliance with the sequential and impact tests does not guarantee that permission will be granted – all material considerations will need to be considered in reaching a decision.”

7.8 Paragraph 12 (Reference ID: 2b-012-20190722) of the NPPG sets out how locational requirements should be considered in the sequential test. It states:

“Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.”

7.9 The requirements of the NPPF and NPPG have been fully considered and have informed the sequential test undertaking with respect to this planning application.

Catchment Area

7.10 As set out in Section 5 of this statement, Lidl foodstores serve a relatively compact catchment area as they provide a neighbourhood shopping facility. Consequently, Lidl’s locational strategy is based on stores in urban areas serving a catchment typically equating to a 0–5-minute drive-time from the chosen site. A catchment plan is included at **Appendix 2** for reference.

7.11 Drawing on this approach, the applicant has undertaken a sequential site assessment for sites and vacant units, within or on the edge of the following defined retail centres:

- Ruislip District Centre;
- Ruislip Manor Minor Centre;
- Ickenham Local Centre;
- 55-97 High Road, Ickenham Local Parade;
- Howletts Lane, Ruislip Local Parade;
- West End Road/New Pond Parade, Ruislip Gardens Local Parade;
- West Ruislip (Station) Ickenham Road Local Parade; and
- West Ruislip Station Parade, Ickenham Road Local Parade.

Scope of the Assessment

7.12 When addressing the sequential approach, both the applicant and Local Planning Authority must adopt realism and only consider sites which are ‘suitable’ for the development proposed by the applicant. The Supreme Court case, involving Tesco and Dundee Council (March 2012), considered the issue and definition of ‘suitability’, and the degree to which an application should demonstrate flexibility. The judgement concluded that that:

- The natural reading of each policy is that the word suitable, in the first criteria, refers to the suitability of site for the proposed development (Rapleys’ Emphasis) – it is the proposed development which will only be acceptable if no suitable site is available more centrally (paragraph 25), and
- The application of the sequential approach requires flexibility and realism from developers and retailers, as well as planning authorities (paragraph 28).

7.13 When determining what constitutes a suitable site, regard has to be given to the need that the proposal is intending to serve. The High Court Decision involving Warners Retail and Cotswold District Council (July 2014), confirmed that the Dundee decision applies in England.

7.14 The judgment of Justice Ouseley in Aldergate Properties v Mansfield District Council (EWHC 1670 (Admin) 8 July 2016), further clarifies the context in which the ‘suitability’ and ‘availability’ of sites should be considered:

“Suitable’ and ‘available’ generally mean suitable and available for the broad type of development which is proposed in the application by approximate size, type and range of goods” (Paragraph 35);

“This incorporates the requirement for flexibility in the NPPF, and excludes, generally, the identity and personal or corporate attitudes of an individual retailer” (Paragraph 35); and “‘Available’ must generally mean available for the type of retail use for which permission is being sought” (Paragraph 42).

Sequential Parameters

- 7.15 Rapleys accordingly have taken the above judgments into account in defining the parameters for assessing the suitability and availability of potentially sequentially preferable sites.
- 7.16 In this case, Lidl is the stated applicant to the proposed development. The broad type of development is therefore discount retail provision based on a limited assortment discount (LAD or ‘deep discount’) foodstore.
- 7.17 On this basis, the following parameters (set out in Section 5 of this statement) have been identified, which reflect the broad range of development proposed having regard to the scale, nature and range of goods typically sold by a ‘LAD’ retailer:
- i. Available sites with an area between 0.32ha (0.8 acres) and 1.62ha (4 acres) with the potential to house a unit measuring between 1,672 sqm to 2,461 sqm (18,000 – 26,500 sqft);
 - ii. Existing vacant units with a floorspace measuring at least 90% of the size of that proposed;
 - iii. A site that can allow for the safe manoeuvring of customer vehicles;
 - iv. A prominent site with the ability to attract passing trade;
 - v. A site that is able to offer adjacent surface level car parking, so that customers can easily transfer goods to their vehicles;
 - vi. A site that can accommodate a dedicated service area to the rear of the store and associated HGV’s deliveries and manoeuvres; and
 - vii. A single storey, open and unrestricted sales floor area which benefits from a generally level/flat topography, or which has the ability to be developed as such.
- 7.18 The above parameters reflect the minimum requirements necessary to accommodate a LAD foodstore and discount mixed-goods retailer and, as such, demonstrate reasonable flexibility in the consideration of potentially sequentially preferable sites within the identified catchment area.

Site Assessment

- 7.19 In assessing and identifying any other potential sequentially preferable sites, for each of the centres within and directly adjacent to the catchment area, a review of the Council’s local development plan documents was undertaken, along with a review of the online property database EGI Radius.
- 7.20 From a comprehensive review of the above, there are no suitable or available sequentially preferable sites within or on the edge of the identified retail centres. No vacant retail units in-, edge- or more sustainability located out-of-centre are meet the sequential parameters of size or availability, with all car parks within the vicinity of centres being either too small or not available for development for a Lidl foodstore.

SUMMARY

- 7.21 As set out above, a sequential site assessment has been undertaken, giving consideration to potentially sequentially preferable sites and premises.
- 7.22 The assessment has found that there are no suitable or available sequentially preferable sites to accommodate the proposed development, even with the application of appropriate flexibility to the site search parameters.
- 7.23 The proposal therefore fully complies with the NPPF requirement for a sequential site assessment to be undertaken for new retail development which is not satisfied within a defined centre.

8 TOWN CENTRE HEALTH OVERVIEW

8.1 The NPPG advises that a judgement as to whether the likely adverse impacts are significant can only be reached in the context of understanding the current vitality and viability of any affected defined centres within the catchment.

8.2 Accordingly, in June 2024 Rapleys undertook a health check assessment of the identified centres which has had regard to the national key indicators of 'health' contained in the NPPG. In-person visits to all centres were carried out to inform the assessments.

8.3 The centres assessed are as follows:

- Ruislip District Centre;
- Ruislip Manor Minor Centre; and
- Ickenham Local Centre.

8.4 The full health check assessment is provided in **Appendix 4**. Summaries are provided below.

Ruislip District Centre

8.5 Ruislip District Centre is located approximately 500m east of the site. The centre stretches from Bury Street (A4180) to the north towards Ruislip Station (Underground) to the south, on West End Road.

8.6 Table 8.1 below highlights the composition of the Town Centre, as assessed by Rapleys, following an in-person to the centre on 9th June 2024.

Table 8.1. Diversity of Uses within Ruislip District Centre

Category	Number of Units	%
Convenience	16	9%
Comparison	51	30%
Retail Services	33	19%
Leisure Services	35	20%
Financial and Business Services	14	8%
Vacant	7	4%
Other	15	9%
Total	171	100%

8.7 Table 8.1 above indicates that the centre has a vacancy rate of 4%, which is below the national average of 13.9% (Source: British Retail Consortium, July 2023).

8.8 It is considered that this centre has a good level of accessibility through a variety of transport modes. The centre benefits from pedestrianised areas and footpaths which offers safe and convenient access.

8.9 It was observed that the centre generally incorporates well-maintained pavements, roads and shopfronts, with little evidence of damage, litter or graffiti. Overall, and on balance, it is considered that the centre demonstrates a good level of environmental health.

8.10 It is considered that this centre performs well with regard to indicators of vitality and viability, with a good mix of uses, good accessibility by all means of transportation, a high-quality environment and a low perception of crime. Vacancy rates have below the national average.

8.11 Based on our analysis, it is considered that the Lidl store proposed through this planning application will not have a significant adverse impact on this centre.

Ruislip Manor Minor Centre

8.12 Ruislip Manor Town Centre is located approximately 1.3km to the east of the site and is centred along Victoria Road.

8.13 Table 8.2 below highlights the composition of Ruislip Manor Centre, as assessed by Rapleys.

Table 8.2. Diversity of Uses with Ruislip Manor District Centre		
Category	Number of Units	%
Convenience	12	8%
Comparison	36	24%
Retail Services	26	17%
Leisure Services	36	24%
Financial and Business Services	10	7%
Vacant	10	7%
Other	21	14%
Total	151	100%

8.14 Table 8.2 above indicates that the centre has a vacancy rate of 7%, which is below the national average of 13.9% (Source: British Retail Consortium, July 2023).

8.15 The vitality and viability of centres depend to a large extent on the quality and variety of retailers represented, with national retailers considered particularly important to attract shoppers. At the same time, independent shops play an important role in distinguishing a centre from its competitors.

8.16 Ruislip Manor Centre currently accommodates a variety of town centre uses such as a vets, hairdressers and takeaways. With regards to the convenience offering, the centre includes a total of twelve convenience users including a Tesco Express.

8.17 Belle Vue/Marton Road Local Centre has a good level of accessibility, with wide pavements and crossings in a good condition. The centre also benefits from good accessibility via public transport, with frequent bus; and a Underground Station.

8.18 Overall, Ruislip Manor Centre presents a below average retail vacancy rate and there is a good mix of retail uses for a centre of its size. Given this it is considered that the vitality and viability of the centre is good. Notwithstanding this the centre benefits from good levels of accessibility and environmental quality.

8.19 Based on our assessment, it is considered that the Lidl store proposed through this planning application, given its specific role and function, will not have a significant adverse impact on this centre.

Ickenham Local Centre

8.20 Ickenham Local Centre is located approximately 1.3km to the southwest of the site and is 1.8Km to the south of Ruislip District Centre. The centre is centred along Swakeleys Road and Long Lane.

8.21 Ickenham Local Centre is considered to have a good level of accessibility, through numerous transport means. The centre is accessible by foot and cycle, with an expansive pedestrianised area in addition to Sheffield cycle stands within the centre. The centre also benefits from a surface level car park.

8.22 In terms of current uses within the centre, Table 8.3 below summarises uses, as assessed by Rapleys.

Table 2. Diversity of Uses within Ickenham Local Centre		
Category	Number of Units	%
Convenience	8	10%
Comparison	13	17%
Retail Services	18	23%
Leisure Services	16	21%
Financial and Business Services	6	8%
Vacant	1	1%
Other	15	19%
Total	77	100%

- 8.23 Table 8.3 above indicates that at the time of the visit the centre had a vacancy rate of 1%, which is significantly below the national average of 13.9% (Source: British Retail Consortium, July 2023).
- 8.24 The centre's comparison offer includes a Boots pharmacy, whilst the centre also benefits from several independent retailers.
- 8.25 In terms of the assessment criteria Ickenham Local Centre presents a good mix of retail uses. However, given the vacancy rate is significantly above the national level, it is considered that the vitality and viability of the centre could be improved. The centre benefits from good levels of Given the above assessment, it is considered that Ickenham Local Centre is in good health.
- 8.26 Based on our assessment, it is considered that the Lidl store proposed through this planning application, given its specific role and function, will not have a significant adverse impact on this centre.

9 RETAIL ASSESSMENT

9.1 This section sets out the applicant's approach to the retail assessment taking into consideration the site's location and the requirements of national and local retail policy.

PROPOSED FOODSTORE

9.2 The proposed single storey foodstore will have a Gross Internal Area (GIA) of 1,825 sqm, of which 1,212 sqm will be sales area (or 'net sales area'). The sales area will incorporate an 80:20 split between convenience and comparison floorspace, meaning that around 970 sqm will be dedicated to convenience retail and 242 sqm will be used for comparison retail.

POLICY REQUIREMENT

9.3 The starting point for determining a planning application is Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004, which confirm that planning applications "*must be determined in accordance with the development plan, unless material considerations indicate otherwise*".

9.4 The NPPF advises that retail proposals not located within an existing centre should be assessed according to their impact (if any) on existing centres. Impact assessments should be provided for all proposals over 2,500 sqm when the proposal is not located within an existing centre and not in accordance with an up-to-date Development Plan.

9.5 The Development Plan (Policy DMTC1) requires 'main town centre uses' proposals over 200sqm in edge or out of centre locations to be supported by an impact assessment. Accordingly, given the scale of development proposed an impact assessment is required.

9.6 Paragraph 94 of the NPPF states that when assessing proposals for edge or out of centre retail development the following two tests should be satisfactorily addressed:

- The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area.

9.7 In determining the development proposed, it is also important to recognise that NPPF paragraph 90 outlines **that policies should where appropriate, seek to retain and enhance existing markets, and/or re-introduce or create new ones** [Our emphasis]. As such, it is considered that it is also incumbent on the decision maker to materially consider the benefits which will arise from a Lidl foodstore in the Ruislip area.

9.8 On the basis above, it is considered that a full retail impact assessment is required by the adopted planning policy for Middlesbrough, which addresses each of the above tests, has been undertaken. The findings of the retail impact assessment are set out below.

PROPOSED CATCHMENT AREA

9.9 A typical discount retail store serves a compact 5-minute drive-time core catchment. This reflects the fact that Lidl stores provide a neighbourhood shopping facility reflecting their comparatively limited retail offer. On this basis, it is therefore considered that majority (80-90%) of customers of the new Lidl store will come from within this 5-minute catchment area. In addition, this catchment area was previously accepted by the LPA. For reference, a copy of the proposal's catchment can be found at **Appendix 3**.

QUANTITATIVE IMPACT ASSESSMENT

9.10 Further to the state of existing centres and the nature of the current shopping patterns being established, an assessment of the impacts on existing centres and facilities has been undertaken in accordance with the planning practice guidance. The steps that should be taken are as follows:

- Calculate available convenience and comparison goods turnover within the proposal's catchment area;
- Calculate benchmarked turnovers for existing stores within the proposal's catchment area;

- Calculate benchmarked turnover of any other stores which may be affected by the development proposed;
- Calculated the benchmarked turnover of the proposed foodstore;
- Examine the ‘no development’ scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);
- Set out the likely impact and potential clawback trade position of the proposal and commitments clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues; and
- Any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal’s trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences for the vitality and viability of existing retail facilities and town centres.

9.11 With the above considerations in mind, this Statement’s quantitative assessment is set out within a series of Tables in **Appendix 5** and the text below.

9.12 As outlined in the retail tables, a price base of 2022 has been used for monetary figures. The base year for the economic assessment is 2024, with a forecast date of 2029. Where appropriate, population and expenditure growth data has been sourced from Experian Micromarketer and Experian Retail Planner Briefing Note (February 2024). Where appropriate and required, proposed store turnovers are based on benchmarked sales density from GlobalData (December 2023).

9.13 Forecasts for each step of the assessment process are outlined below.

POPULATION FORECASTS

9.14 Table 1 at Appendix 5 sets out the population and population growth within the 5-minute drivetime catchment area for the proposed development. This information as sourced directly from Experian. Table 9.1 below summarises population forecasts between 2024 and 2029.

Table 9.1. Population Forecasts

Year	2024	2025	2026	2027	2028	2029
Catchment Area	19,088	19,097	19,119	19,142	19,137	19,132

Source: **Appendix 5** – Table 1.

EXPENDITURE PER CAPITA & GROWTH ASSUMPTIONS

9.15 The annual expenditure per capita for convenience and comparison goods is sourced from Experian (June 2024). As per Experian’s reporting, this information has a base year of 2022. Per person growth assumptions for both convenience and comparison goods have been applied to the 2022 base year figures. Growth assumptions have been sourced from the latest Experian Retail Planner Briefing Note (February 2024).

9.16 Growth assumptions take into account predicted annual growth in consumer convenience and comparison goods spending from the 2022 base year to 2029. An allowance (a percentage subtraction) for internet-based shopping expenditure (Special Forms of Trading [SFT]) has also been taken into account.

9.17 Internet (SFT) based per person expenditure is subtracted from the total per person on the basis that internet-based shopping transactions typically occur at locations outside the defined study area (warehouse/distribution centre-based sales that are posted to the consumer). The approach for subtracting SFT from per person spending is a tested and accepted methodology.

9.18 The assessment of available per person spend is fully outlined at Tables 2 of Appendix 5. However, for the readers' assistance, Table 9.2 below summarise per person expenditure.

Year	2024	2025	2026	2027	2028	2029
Convenience	£2,340	£2,325	£2,320	£2,315	£2,310	£2,308
Comparison	£2,696	£2,725	£2,791	£2,858	£2,926	£3,001

Source: **Appendix 5 – Tables 2. Excludes SFT.**

TOTAL AVAILABLE CONVENIENCE AND COMPARISON GOODS EXPENDITURE

9.19 The total available expenditure is the sum of per person spending multiplied by the population of each catchment area. Table 9.3 below summarise the available convenience and comparison goods expenditure within the catchment area.

Year	2024	2025	2026	2027	2028	2029
Convenience	£44.66	£44.40	£44.36	£44.32	£44.21	£44.15
Comparison	£51.47	£52.04	£53.36	£54.70	£56.00	£57.41
Total	£96.12	£96.44	£97.71	£99.02	£100.21	£101.56

Source: **Appendix 5 – Tables 3. Excludes SFT.**

PROPOSED STORE – BENCHMARK TURNOVER

9.20 For the purposes of this impact assessment, the turnover of the proposed Lidl store turnover is based on published benchmarked (company average) convenience and comparison goods sales densities (£ per sq.m). Published benchmarks are in a 2023e price base, and have been readjusted to 2022 prices, in order to keep the price base consistent with Experian data; which are formulated in 2022 prices.

9.21 Published sales densities are sourced from GlobalData (December 2023); which is the most up-to-date dataset at the time of writing. The use of the GlobalData figures for retail assessments is now a standard practice for all Lidl planning applications across the country.

9.22 The proposal's benchmarked turnover is summarised within Table 9.4 below.

	Total Net Sales Floorspace (sq.m)	Benchmark Turnover (£/sq.m)	Total Store Turnover 2021 (£m)	Total Store Turnover 2024 (£m)	Total Store Turnover 2029 (£m)
Convenience	974	£10,680	£10.40	£10.13	£10.21
Comparison	243	£2,324	£0.56	£0.54	£0.61
Total	1,217	-	£10.97	£10.68	£10.82

Source: **Appendix 5 – Table 4**

PLANNING COMMITMENTS

9.23 At the time of writing, Rapleys are not aware of any retail planning commitments within the proposal's 5-minute drive time catchment area. The proposal itself, by virtue of being within a defined town centre, will be inward planned investment supported within the Development Plan.

AVAILABLE EXPENDITURE

9.24 Rapleys has undertaken a comparison of available expenditure with the agreed 5-minute drive time catchment area, against the benchmark turnover of the proposed development. This assessment is fully outlined in Appendix 5 but for ease of reference, is summarised within Tables 9.5 to 9.7, below.

Table 9.5. Available Convenience Expenditure (£m)

Year	2024	2029
Catchment Area Available Expenditure (£m)	£44.66	£44.15
Convenience Turnover of the Proposed Store (£m)	£10.13	£10.21
Percentage of Total Available Convenience Expenditure (%)	23%	23%
Expenditure Remaining (£m)	£34.53	£33.94

Source: *Appendix 5 – Table 5A*

Table 9.6. Available Comparison Expenditure (£m)

Year	2024	2029
Catchment Area Available Expenditure (£m)	£51.47	£57.41
Comparison Turnover of the Proposed Store (£m)	£0.54	£0.61
Percentage of Total Available Convenience Expenditure (%)	1%	1%
Expenditure Remaining (£m)	£50.92	£56.80

Source: *Appendix 5 – Table 5B*

Table 9.7. Available Comparison Expenditure (£m)

Year	2024	2029
Catchment Area Available Expenditure (£m)	£96.12	£101.56
Comparison Turnover of the Proposed Store (£m)	£10.68	£10.82
Percentage of Total Available Convenience Expenditure (%)	11%	11%
Expenditure Remaining (£m)	£85.45	£90.73

Source: *Appendix 5 – Table 5C*

9.25 Tables above demonstrate that the proposed development only represents circa. 23% and 1% of available convenience and comparison expenditure within the proposal's core 5-minute drivetime catchment; and only represents circa. 11% of total turnover.

9.26 The review demonstrated that there will be over £50m (2024) of available convenience goods expenditure for other retailers within Ruislip. Overall, there will be over £85m (2024) available to all retailers post development. It is considered that this review demonstrates ample capacity to accommodate the development proposed.

BASE POSITION - EXISTING STORE / TOWN CENTRE TURNOVERS

9.27 As part of the assessment, benchmarked turnovers of existing stores within the proposal's 5-minute drivetime catchment have been calculated, based on GlobaData and estimated sales densities for national multiple retailers and local retailers.

9.28 Benchmarked derived turnovers for existing centres and stores are summarised within Table 9.8, below.

Table 9.8. Benchmarked Turnover of Existing Facilities.

Locations in 5-minute drivetime	Assessment Years			
	Pre-Development Conv. Turnover 2024 (£m)	Pre-Development Comp. Turnover 2024 (£m)	Pre-Development Conv. Turnover 2029 (£m)	Pre-Development Comp. Turnover 2029 (£m)
Ruislip District Centre				
Iceland	£4.84	£0.04	£4.88	£0.05
Sainsbury's Local	£2.87	£0.48	£2.90	£0.54
Tesco Express	£3.77	£0.61	£3.80	£0.69
Waitrose	£16.21	£2.84	£16.34	£3.19
Other Convenience & Comparison Stores	£5.19	£27.89	£5.24	£31.37
Ruislip District Centre Sub-Total	£32.89	£31.86	£33.16	£35.83
Ickenham Local Centre				
Local Stores	£1.05	£0.16	£1.06	£0.18
Other Convenience & Comparison Stores	£2.40	£4.32	£2.42	£4.86
Ickenham Local Centre Sub-Total	£3.45	£4.48	£3.48	£5.04
Ruislip Manor Town Centre				
Budgens	£0.69	£0.10	£0.69	£0.11
Tesco Express	£4.05	£0.66	£4.09	£0.74
Other Convenience & Comparison Stores	£3.05	£16.12	£3.08	£18.13
Ruislip Manor Town Centre Sub-Total	£7.79	£16.88	£7.86	£18.98
Other Locations				
Aldi, Victoria Retail Park, Ruislip	£11.70	£1.14	£11.80	£1.28
Aldi, Field End Road, Pinner	£9.66	£0.94	£9.74	£1.06
Asda, Old Dairy Lane, Ruislip	£39.11	£7.98	£39.42	£8.98
Other Convenience & Comparison Stores	£1.17	£1.15	£1.18	£1.30
Other Locations Sub-Total	£61.64	£11.21	£62.13	£12.61
OVERALL TOTAL	£105.78	£64.42	£106.62	£72.46

Source: *Appendix 5 – Table 6*

9.29 Table 9.8 above demonstrates that centres and existing stores in and around the proposals 5-minute drivetime catchment generate £105.78m in convenience goods turnover in 2024; raising to £106.62m by 2029. For comparison goods turnover, locations generate £64.42m and £72.46m in 2024 and 2029 respectively.

9.30 Further to the above, it is important to recognise that the existing highway network available to the proposal site and wider Ruislip area is extensive, and that some existing stores outside the proposals core 5-minute drivetime will have overlapping catchments owing their size and relative ease of access. As such there will be some trade drawn from these other locations towards the proposed development. Accordingly, it is envisaged that there will be an element of trade drawn from stores outside the

proposal's core 5-minute catchment; particularly from comparable retailers on the just outside the proposal's core catchment.

- 9.31 Benchmarked turnovers for these locations generate £61.64m and £62.13m in convenience goods turnover in 2024 and 2029 respectively. For comparison goods turnover they generate £11.21m and £12.61m in 2024 and 2029 respectively.
- 9.32 Based on the above, it is considered that a good proportion of trips to the proposed Lidl store will be from claw back trade from residents within the proposals 5-minute drivetime catchment who are already travelling to locations outside this catchment area.

TRADE DIVERSION & IMPACT

- 9.33 The full quantitative trade diversion patterns for Ruislip District Centre and other locations both within and outside the proposal's catchment area, can be found at Table 7 of Appendix 5.
- 9.34 Predicted trade draw and subsequent impact based on benchmarked turnovers can be found at Table 7 of Appendix 5. Total diversion and impact patterns are summarised in Table 9.8 below.

Locations in 5-minute drivetime	Total Diversion		Convenience & Comparison Impact (%)	
	2024	2029	2024	2029
Ruislip District Centre	Conv. & Comparison Goods (£m)	Conv. & Comparison Goods (£m)		
Iceland	£0.35	£0.36	7.26%	7.25%
Sainsbury's Local	£0.33	£0.34	9.88%	9.81%
Tesco Express	£0.38	£0.39	8.72%	8.65%
Waitrose	£1.85	£1.87	9.73%	9.59%
Other Convenience	£0.41	£0.41	7.00%	6.92%
Other Comparison	£0.14	£0.15	0.50%	0.50%
Ruislip District Centre Sub-Total	£3.46	£3.52	5.35%	5.10%
Ickenham Local Centre				
Local Stores	£0.10	£0.10	8.39%	8.27%
Other Convenience	£0.10	£0.10	4.01%	3.99%
Other Comparison	£0.03	£0.03	0.65%	0.65%
Ickenham Local Centre Sub-Total	£0.23	£0.23	2.90%	2.76%
Ruislip Manor Town Centre				
Budgens	£0.08	£0.08	9.65%	9.51%
Tesco Express	£0.42	£0.42	8.84%	8.72%
Other Convenience	£0.10	£0.10	2.89%	2.85%
Other Comparison	£0.05	£0.06	0.35%	0.35%

Table 9.9. Convenience & Comparison Trade Diversion and Impact (£m/%)

Ruislip Manor Town Centre Sub-Total	£0.65	£0.66	2.63%	2.46%
Other Locations				
Aldi, Victoria Retail Park, Ruislip	£1.67	£1.69	13.01%	12.92%
Aldi, Field End Road, Pinner	£1.67	£1.69	15.75%	15.65%
Asda, Old Dairy Lane, Ruislip	£1.83	£1.85	3.88%	3.82%
Other Convenience	£0.10	£0.10	8.67%	8.67%
Other Comparison	£0.00	£0.00	0.00%	0.00%
Other Locations Sub-Total	£5.27	£5.33	7.23%	7.13%
INFLOW	£1.07	£1.08		
TOTAL	£10.68	£10.82		

Source: *Appendix 5 – Table 7*

- 9.35 It is important to recognise that the above impact assessment is based on the assumption that the existing and proposed stores trade at benchmarked turnovers. This therefore represents a worst case scenario in terms of assessing the potential impact, as some stores in the assessment area could be overtrading; in particular other discount food operators.
- 9.36 When considering the impact of the development proposal in retail planning terms, it is necessary to look at the impact of the development on the centre as a whole, as opposed to its impact upon any single retailer within the centre. To this end, in relation to Ruislip District Centre, it is anticipated that the proposed development will divert £3.46 in 2024 and £3.52m in 2029, equating to an impact of 5.35% and 5.10% on Ruislip District Centre in 2024 and 2029. Most of this diversion will be from Waitrose (£1.85m [2024]) resulting in 9.73% impact on this store. The level of impact identified is considered appropriate, and will not lead to any significant adverse impacts on the vitality and viability of this centre.
- 9.37 In total, predicted trade diversion from Ruislip District Centre represents circa. 32% of the proposal's benchmarked turnover.
- 9.38 In regard Ickenham Local Centre, trade diversion will be minimal, given that this location consists of small convenience stores catering for top-up shopping trips. These stores will not directly compete with the development proposed through this planning application. Overall, it is identified that just £0.23m (2024) would be diverted from this location, resulting in a 2.90% impact. It is considered that this impact will not cause any significant adverse impacts on the vitality and viability of this centre.
- 9.39 In regard to Ruislip Manor Town centre, it is envisaged that £0.65m (2024) will be diverted from this centre; resulting in a 2.63% impact on the store. However, it is important to recognise that this centre does not have comparable retailer to that proposed.
- 9.40 In regard to stores located outside of the proposed Lidl store's catchment, it is envisaged that that some residents living outside the proposal's catchment area will divert their existing shopping trips to the development proposed. Overall, £5.27m (2024) will be diverted from these locations; resulting in an overall impact of just 7.23% on these locations.
- 9.41 On the basis of the above, it is considered that no one retail centre assessed will have any significant adverse impacts to their vitality and viability. Accordingly, the development is therefore considered to be fully compliant with this criterion of paragraph 94 of the NPPF.

IMPACT OF THE PROPOSAL ON EXISTING, COMMITTED AND PLANNED PUBLIC AND PRIVATE INVESTMENT IN A CENTRE OR CENTRES IN THE CATCHMENT AREA OF THE PROPOSAL

9.42 At the time of the application's submission, it is not considered that there are any existing, committed, and planned public and private investments in a centre or centres in the catchment area of the proposal which the Lidl development would have a significant adverse impact upon.

Accordingly, the development is therefore considered to be fully compliant with this criterion of Paragraph 94 of the NPPF.

SUMMARY

9.43 In summary, it has been demonstrated within the above note that the application proposal will not have a significant adverse impact on the vitality and viability of Ruislip District Centre or any other centre within the study area within the proposal's 5-minute core drivetime catchment area.

9.44 The proposal will deliver many benefits for local residents, including an improved range and choice of convenience goods in Ruislip, increased employment opportunities, reduced journey times for residents, and increased scope for use of sustainable modes of transport.

9.45 The development also signals Lidl's commercial intent to improve consumer choice in the area, which will have associated economic investment benefits. The application site is, in our view, the only sustainable location outside of an identified centre within the retail hierarchy, which can meet the applicant's retail requirements.

9.46 In summary, it is considered that the proposals are in accordance with the NPPF, NPPG, and all retail related Development Plan policies.

10 PLANNING ASSESSMENT

10.1 Based on the preceding review and analysis of the planning policy, guidance and material considerations relevant to the site and the proposals, the key planning issues relevant to the determination of this application are as follows: -

- Principle of Development;
- Retail Policy Matters;
- Economic Benefits;
- Design;
- Transportation and Highways;
- Flood Risk and Drainage;
- Heritage;
- Noise;
- Lighting;
- Trees and Landscaping;
- Ecology and Biodiversity; and
- Sustainability.

10.2 Each of the above topics are addressed in turn below.

Principle of Development

10.3 The proposed development site involves the redevelopment of a brownfield site, thus this element of the development is in line with national guidance.

10.4 The existing site incorporates a former public house (closed in December 2023) with a hotel function, which is still operational. Policy HC7 of the London Plan seeks to protect public houses unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.

10.5 Accordingly, there is an on-going marketing exercise which commenced in April 2024. At the time of writing the report, there has been no firm offer or interest from any community uses or pub operators. The marketing campaign will be ongoing during the application process, and once the marketing is complete, a full marketing report will adjoin a the planning application.

10.6 Additionally, there are several public houses or similar facilities within the vicinity of the application site. As such, the loss of the public house can be supported in this instance as would not have a detrimental effect on the number of public houses within the catchment area.

10.7 In terms of the hotel use (C1), in the written pre-application response, the Council has confirmed that the loss of this use is accepted by the virtue of the position of the site outside a designated town centre or Opportunity Area. As such, the development would not conflict with Policy E10 of the London Plan.

10.8 Therefore, subject to addressing relevant retail and technical considerations and other material planning considerations, the principle of development on the site is understood to be supported.

Retail Policy Matters

10.9 As outlined in the preceding sections this application seeks approval for a new discount foodstore (Use Class E) in a location considered to be out-of-centre, in retail planning policy terms. As such, a sequential assessment and retail impact assessment has been prepared.

10.10 Paragraph 91 of the NPPF (2024) confirms Local Planning Authorities should apply a sequential test to planning applications for main town centre uses (including retail) that are not in an existing centre and are not in accordance with an up-to-date Development Plan.

10.11 Paragraph 92 of the NPPF (2024) confirms when considering edge-of-centre and out-of-centre proposals, preference should be given to accessible sites which are well connected to the town centre.

Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge-of-centre sites are fully explored.

- 10.12 The sequential assessment has found that there are no suitable or available sequentially preferable sites to accommodate the proposed development, even with the application of appropriate flexibility to the site parameters.
- 10.13 The retail impact assessment concludes that the proposal will not have any significant adverse impact on existing, committed and planned public and private investment in any centre or centres in the catchment area of the proposal.
- 10.14 Given the findings of the two retail assessments, it is considered that the proposed development is in accordance with Policy SD7 of the London Plan (2021), along with the principles of the NPPF.

Economic Benefits

- 10.15 As highlighted above, section 6 of the NPPF focuses on building a strong, competitive economy. The economic role is one of the three dimensions for achieving sustainable development. In these terms, the economic role of sustainable development contributes to building a strong, responsive and competitive economy. In particular, paragraph 85 of the NPPF stipulates planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.
- 10.16 From a local planning policy perspective, the Policy E2 of the London Plan and E2 of the adopted Local Plan seek to promote development which provides business space and employment opportunities; and contributes positively to the economy.
- 10.17 The proposed Lidl foodstore will create around 40 new employment opportunities, which will be offered predominantly to local residents. As previously outlined within Section 5, Lidl offers an excellent work ethic and training opportunities for staff to progress within the company. The positions will be wide ranging from material and administrative positions in addition to store assistants and cashiers.
- 10.18 Furthermore, the introduction of a new discount retailer to Ruislip will increase retail competition in the area and improve consumer choice. This will, in turn, give local residents greater opportunity to shop around and potentially reduce their food expenditure.
- 10.19 Overall, it is considered that the proposed development will offer significant tangible benefits to the area, including employment opportunities; new facilities for local residents and businesses; and increased consumer choice. It is considered that the economic benefits of the proposed development are significant and will assist in the economic recovery of the Borough following the impacts of the Covid-19 pandemic. As such, it is considered that the proposed development will forward the visions of national, regional and local planning policy.
- 10.20 With the above in mind, it is considered that the proposed development is in line with the economic requirements of the NPPF; and will deliver significant benefit to the local community.

Design

- 10.21 Policies D3 of the London Plan, BE1 of the Hillingdon Local Plan Part 1 and Policy DMHB11 of the Hillingdon Local Plan Part 2 requires that high-quality design is implemented to maintain and enhance the character of the area.
- 10.22 The proposed building, which is considered to incorporate an appropriate layout, density and scale, will incorporate high quality materials and a muted and coherent colour palette. As a result of the pre-application consultation feedback, the proposed elevational treatments will complement and enhance the aesthetic of the surrounding area and mirror the design of nearby retailers such as Waitrose (Wood Ln); whilst reflecting Lidl's corporate branding.
- 10.23 A Townscape & Visual Impact Assessment, prepared by BEA Landscape accompanies this application. This assessment confirms the following:

Whilst it is undeniable that the proposed development would impact the high value receptors within the locale, as identified within the various viewpoints, it should be noted that the existing boundary landscape along the northern, western and eastern boundaries are to be retained and enhanced which ultimately in terms of a visual impact would generally be negligible to minor. The largest visual effects are those exerted on the Grade II Listed 'White Bear' Public House and the Locally Listed Fiveways Apartment Building. Should landscape interventions be included within the development (as identified

on Fig.17 Landscape Strategy Plan) to screen the development these receptors then the level of the impacts can be lessened or even mitigated against.

Finally the relocation of the Spitfire War Memorial should be seen as a beneficial contribution within the development.

- 10.24 Based on the submitted Design & Access Statement and Townscape Visual Impact Assessment, the proposed development complements the surrounding area and conforms to local and regional policies on design. More information is contained within the Design & Access Statement.

Transportation and Highways

- 10.25 A Delivery & Servicing Management Plan, Transport Assessment and Travel Plan have been prepared by Cora IHT and is submitted as part of this application. The Transport Assessment concludes the following: -

Vehicular access to the development site is proposed via the existing priority access to the site off the B466 Ickenham Road, adjacent to the Church Avenue / Ickenham Road priority junction. The existing site access is to be adapted to achieve a 9m clear width.

Direct pedestrian access will also be provided off Ickenham Road, located adjacent to the bus stops and 5-arm roundabout junction.

The Lidl store proposes a total of 72 spaces are to be provided on site, including 4 disabled, 3 parent & child bays and 2 electric charging bays. Passive infrastructure for 14 EVCP spaces in the future will also be made available.

A total of 6 self-storage bays for cycles is being proposed, with 24 of those cycle spaces for short stay and 12 of those are for long-stay cycles.

The development impact from the proposed trips on the observed junctions are minimal, whilst the capacity assessments show that the junctions would operate within capacity in both opening and future assessment years.

The recorded accident data within the vicinity of the site does not indicate any existing highway safety patterns or problems.

Paragraph 116 of the NPPF states that: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". The proposed development would have a minimal impact on the highway network.

- 10.26 Given the above, it is considered that the proposed development is acceptable with respect to transport and highways; and is compliant with local and national planning policy. There are no highways or transportation-related reasons upon which a refusal of the planning application for the proposals would be justified.

Flood Risk and Drainage

- 10.27 The site is considered to be at very low risk of flooding from all sources, with the site located within Flood Zone 1, which is designated as the least vulnerable from flooding. Nevertheless, a Flood Risk Assessment has been prepared by Cora IHT which accompanies the submission. This assessment concludes: -

"The site is Wholly contained within in Environment Agency (EA) Flood Zone 1. Reference to NPPF Table 3 shows that an Exception Test is not required as buildings used for shops are classified as less vulnerable and all uses are acceptable in areas categorised as Zones 1.

The site is considered to be at a very low overall risk of flooding provided that surface water flooding risks are appropriately managed during the development. EA mapping indicates that sections of Sharps Lane may currently experience an element of surface water flooding and this potential risk has been considered as part of the preliminary site surface water drainage strategy. It is recommended that

finished floor levels are set at least 150mm above external ground levels to protect against localised pooling of surface water during heavy prolonged rainfall.

The risk of flooding elsewhere should not be increased as a result of the development.

The nearest surface watercourse is the River Pinn, which is located approximately 665m north of the proposed site.

A maximum permissible discharge rate of 9.09 l/s for the 1 in 100-year storm event plus 40% allowance for climate change will be used to inform the proposed design.

Attenuation will be provided on the site to ensure that the calculated greenfield run off rate is not exceeded during a 1 in 100-year storm event, inclusive of a 40% allowance for climate change. Based on the calculated run off rate of 9.09 l/s, the modelled level of storage required to achieve the proposed discharge rates.

The new site drainage will be designed with sufficient capacity not to flood during a 1 in 30-year storm event plus 35% allowance for climate change as well as to contain flood water generated from a 1 in 100 year plus climate change storm event (+40%) within the site. The risk of off-site flooding would not increase as a result of the development and safe access and egress will be maintained.

Foul flows are anticipated to communicate with the offsite system potentially through an existing connection.

Discharge restrictions/charges may apply for connections to the public drainage network and for discharge of surface waters into the adjacent watercourse.

The potential for pollution of controlled waters is considered to be low provided best practice procedures are following during development. Drainage systems should be maintained to ensure that they do not become blocked and unable to discharge.

The proposed development aims to incorporate water saving fixtures and fittings to achieve over 40% reduction over industry baseline. This is equivalent to 3 credits in the BREEAM Wat01 category.

Whilst the development aims to reduce water demand in the first instance, consumption will also be offset through the provision of rainwater collection and greywater systems where feasible. 0.1.13 Affinity Water has devised a Drought Management Plan (DMP) which is of relevance for the development. Drought plans are a statutory requirement for all water companies under Section 39B of the Water Industry Act 1991 (WIA 1991). The DMP has been produced in line with the Drought Plan. Regulations 2005 and the Drought Plan (England) Direction 2016. During a drought, Affinity Water would manage the supply and demand balance using a two-tiered approach, in which they would look to reduce demands on the water resources, as well as increasing the water available for use.

A leak detection system is proposed to be installed which is capable of detecting a major water leak on the mains water supply within the building and between the building and the utilities water meter is installed.

Overall, the development aims to use water responsibly, reuse water where possible, incorporate SuDS to maximise the efficiency of the development, take future weather such as droughts and floods into consideration, monitor possible leaks and utilise water efficient landscaping and equipment."

- 10.28 The findings of the Flood Risk Assessment submitted concludes that the overall flood risk to and from the site are considered to be very low and that the proposed development accords to the relevant drainage and flood risk policies contained within the Hillingdon Local Plan, London Plan and National Planning Policy Framework.

Heritage

- 10.29 The site is located within the Ruislip Village Conservation Area and incorporates the Spitfire Memorial Local Heritage Asset. As part of the development, a new memorial garden is proposed to the south of

the site, with the spitfire memorial being relocated slightly to ensure the memorial garden complements the memorial.

- 10.30 This application is supported by a Heritage Assessment, prepared by Border Archaeology, which concludes the following: -

“The overall impact of the proposed works can be assessed as Moderate to Large. This assessment reflects the fact that the proposals indicate that the historic Orchard public house will be demolished, and a retail unit developed in its place. The public house, whilst heavily altered, retains some of its historic character and positively contributes to the setting of the Ruislip Village CA along with the settings of the Grade II listed White Bear Public House and the locally listed Fiveways. Its demolition would also entail the relocation of the Spitfire and 303 Squadron Memorial and a loss of its historic context. As the favoured public house of the historic 303 Squadron, who were based at RAF Northolt, the demolition of the Orchard would result in the removal of a building with significant local historical importance.

This assessment has also considered the potential mitigations regarding the proposed works, namely the alterations made to the Orchard and its visibility from street level. The alterations have been made across the Orchard, including the S-facing façade, but largely concern the rear and side elevations. These are less visible and as such have restricted the loss of character to the building. Whilst altered, the front elevation is still recognisable from its historic form as shown from the 1935 photograph (Plate 3). As such, it is considered that the Orchard still retains much of historic character.

In terms of the prominence of the Orchard within the surrounding area, it has been considered that the hedges to the front of the Orchard do provide some cover to its and make slightly less visible. However, it is still a prominent landmark within the area that occupies a large plot at the junction of several important roads. It forms a key part of the visual landscape of the Ruislip Village CA and the settings of the Grade II listed White Bear public house and the locally listed early 20th century property at Fiveways, both of which overlook the site.

The other identified heritage assets will be minimally affected by the proposed works, given the lack of intervisibility between them and the Orchard public house.

In order to reduce potential heritage impacts, it is respectfully suggested that consideration could be given to the following measures:

It is respectfully suggested that an Archaeological Historic Building Recording (ASBR) should be undertaken on The Orchard to Historic England Level 3/4, to produce a suitably comprehensive record of the building and its setting prior to any development.

Finally, the construction of a memorial garden for the relocated Spitfire memorial and provision of appropriate information boards would help to enhance public appreciation of the memorial, its significant wartime associations with the Battle of Britain and its local connection to the Orchard Hotel.”

- 10.31 It is acknowledged that the proposal would provide a public benefit by preserving the long term use of the site with a viable occupier, increase consumer choice for the local residents and provide a memorial garden to enhance the setting of the locally listed Spitfire memorial. Cumulatively, these public benefits outweigh the harm to the Conservation Area and nearby heritage assets and ensures the proposed development conforms to the overarching themes stated in Paragraphs 202-206 in the National Planning Policy Framework (2024) and as such are considered acceptable.

Noise

- 10.32 This application is supported by a Noise Assessment, prepared by Acoustic Consultants, which concludes the following: -

“This report provides a noise assessment of both plant and delivery operations on the nearby sensitive receivers around the site.

The noise impact assessment has been undertaken in accordance with the guidance in the National Planning Policy Framework (NPPF), Noise Policy Statement for England (NPSE), Planning Practice Guidance (PPG) and British Standard 4142:2014+A1:2019 (BS4142).

As can be seen above, comparing the noise impact of the plant with the measured background noise levels at the NNSRs, it is clear that plant noise will have a low impact and will be acceptable when assessed to British Standard 4142:2014+A1:2019. This is subject to mitigation being installed.

We would consider the noise impact of the proposed plant to fall below the Lowest Observed Adverse Effect Level (LOAEL) of the NPSE and PPG during the daytime and, as such, achieves the aims of National Planning Policy Framework (NPPF).

From the assessment it can be concluded that the deliveries would be considered acceptable for the daytime period only (07:00-23:00 hours).

We would consider the noise impact of the proposed unloading and vehicle movements associated with deliveries to the Lidl food store to fall below the Low Observed Adverse Effect Level (LOAEL) of the PPG and NPSE during daytime hours only.”

- 10.33 Based on the above, it is considered that the proposed development is acceptable from a noise perspective and accords with local, regional and national planning policies.

Lighting

- 10.34 An external lighting plan is submitted as part of this application. The plan, which includes LUX figures, demonstrates that the proposed lighting scheme will not have any significant adverse impact on the surrounding area, whilst ensuring that the site is sufficiently lit for security and safety purposes.
- 10.35 Given this, it is considered that the proposed lighting is acceptable in line with local and national planning policies.

Trees and Landscaping

- 10.36 The Arboricultural Impact Assessment, prepared by RPS and submitted as part of this application, provides an assessment of the existing trees on site.
- 10.37 The development proposals will require the removal of 17 trees and tree groups in order to facilitate the proposed development as they are situated in the footprint of the development or their retention and protection throughout the development is not suitable.
- 10.38 The design of the new development has considered tree crown positions in relation to the development. Some shade from trees may be beneficial. In particular, deciduous trees give shade in summer but allow access to sunlight in winter. However, the design proposals avoid excessive shadowing, and given adequate provision for future tree growth.
- 10.39 To offset the loss of trees, high quality landscaping has been proposed incorporating six new trees, five of which are located within the memorial garden to the south of the site. This garden is a high-quality landscape area, fronting Ickenham Road, ensuring the proposed development complements its setting and provides a gateway to the Conservation Area.
- 10.40 The proposed landscaping and retained trees will ensure that the proposed development is visually appealing and will minimise the visual impact of the development.
- 10.41 Overall, it is considered that the proposed development accords with local and national planning policies. As such, it is considered that the proposed development is acceptable in terms of trees and landscape.

Ecology and Biodiversity

- 10.42 A Preliminary Ecological Appraisal and Biodiversity Statement, prepared by Biodiverse Consulting, has been submitted as part of the application. The Biodiversity Statement has confirmed the following:

The baseline habitats onsite provide a total of 0.47 Habitat Units and 1.13 Hedgerow Units. The habitats onsite post-development provide a total of 0.35 Habitat Units and 0.63 Hedgerow Units. This leads to a net change of -0.12 equating to a 25.22% net loss in Habitat Units and a net change of -0.49 equating to a 43.78% net loss in Hedgerow Units. Trading rules are not currently satisfied for this project as there is an overall loss of 0.34 low distinctiveness Habitat Units and 0.54 Medium Distinctiveness Species-rich native hedgerow Hedgerow Units.

To achieve a 10% Net Gain, a total of 0.17 Habitat Units and 0.61 Hedgerow Units will need to be acquired offsite either via a Registered Offsite Gain Provider or Statutory credits.

- 10.43 Subject to the Council's acceptance for offsite credits, the proposed development would conform to local, regional and national requirements regarding biodiversity.

Sustainability

- 10.44 As outlined throughout this document, including at section 5 of this Statement, Lidl promote economic, environmental and social sustainability.
- 10.45 In terms of social sustainability, the proposed development will deliver a new modern shopping facility to local residents. This will promote consumer choice; help save locals money on groceries; and provide a good shopping experience, with excellent customer facilities (toilets, in-store bakery, parking, etc...). The proposal will also deliver high-quality employment opportunities, which will positively impact the local area.
- 10.46 With regards to environmental sustainability, the proposed foodstore and storage use will be sustainably constructed, with construction techniques, materials and operational practices to promote energy saving and carbon reduction. Other measures to promote environmental sustainability include a rooftop PV solar panel array for on-site energy generation; and the provision of EV charging points, which will allow customers to charge their vehicles whilst shopping.
- 10.47 For the reasons outlined, the proposed development therefore accords with local and national policies on sustainability.

11 SUMMARY AND CONCLUSION

11.1 This Statement has assessed the proposed development against the NPPF; and relevant policies contained within the Local Development Plan and other relevant material considerations.

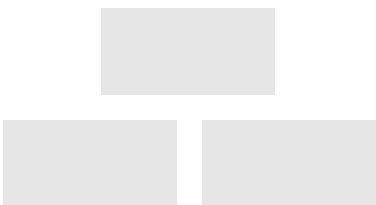
11.2 It is concluded that the proposal is in accordance with national, local and neighbourhood planning policy; and there are no other material considerations that indicate outline planning consent should not be forthcoming. The development proposals constitute sustainable development for the following reasons:

- The principle of the redevelopment of a brownfield site is supported by local and national planning policy;
- The marketing exercise done to date has not found another potential public house operator or a community use;
- The proposed development will deliver significant economic benefits to the area and offer new employment opportunities for local residents;
- The development is accessible by sustainable transport means and will not result in any severe impact on the highway network or other elements of the transport network;
- The site is not subject to any significant risk of flooding and appropriate drainage can be implemented on the site;
- The indicative design, layout and landscaping of the scheme will create an attractive development, which is in keeping with the character of the surrounding area and promotes a good level of functionality;
- The new memorial garden enhances the Locally Listed Spitfire Memorial and ensures the Spitfire is conserved and its significance preserved within the development site;
- The development will not lead to any significant adverse impact on the amenity of neighbouring users; and
- Appropriate tree planting and landscaping will be included as part of the development, this will result in a biodiversity net gain and create new habitats.

11.3 Overall, the proposed scheme adopts the principles of sustainable development, in relation to social, economic and environmental factors. The proposals accord with the emphasis of national policy contained within the NPPF, which confirms a presumption in favour of sustainable development.

11.4 In these terms, it has been demonstrated that the scheme complies with relevant policy as set out within the NPPF and the Development Plan. Therefore, this outline planning application should be supported.

Site Location Plan



NO DIMENSIONS TO BE SCALED FROM THIS DRAWING

Rev	Date	Reference	Drawn / Chk'd
P01	2024/07/17	P01 FIRST ISSUE	AA AA



Client _____

Lidl Great Britain Ltd

Project _____

Lidl
Ickenham Road, Ruislip

Title _____

Site Location Plan

Drawing Ref. _____ Revision _____

4478-0108

P01

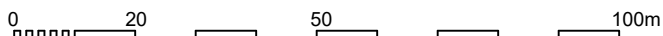
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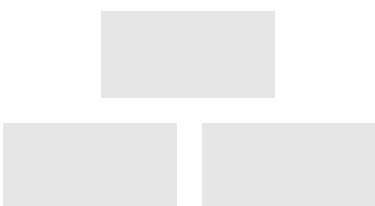
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Proposed Site Layout Plan





PARKING

Standard		46
Disabled	♿	4
Enlarged Bay	E/B	3
Parent & Child	👨👧	3
EVCP 22kW & 50kW DC Rapid Charging Spaces	🚗⚡	2
Passive Infrastructure for future EVCP Charging Spaces	👤	14
Total Customer Parking		72
Short Stay Cycle	🚗	24
Long Stay Cycle	🚗	12

SCHEDULE OF ACCOMMODATION - KEY

Site Area	0.646Ha (1.596 Acres)
GIA	1,825 sq m
GEA	1,902 sq m
Sales Area	1,212 sq m
WAREHOUSE	
Warehouse	217 sq m
Bakery Warehouse	52 sq m
Additional Chillers	44 sq m
DRS Store	40 sq m
Total Warehouse	353 sq m
ANCILLARY AREA	
Bakery Prep	65 sq m
Cash Office	10 sq m
Welfare Area, wcs, etc	87 sq m
Customer WC	9 sq m
Utility	8 sq m
Circulation	32 sq m
Internal Partitions	49 sq m
Total Ancillary	260 sq m

Client

Lidl Great Britain Ltd

Project

Lidl
Ickenham Road, Ruislip

Title

Site Plan as Proposed
Option C

Drawing Ref.

4478-0105

Revision

P12

Scale - unless otherwise stated

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Status

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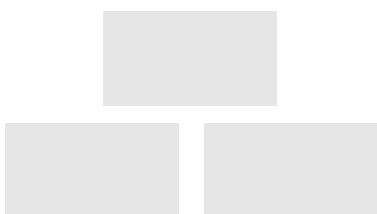
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0 10 20 30 40 50m




Core 5-minute (off-peak) Drivetime Catchment Area

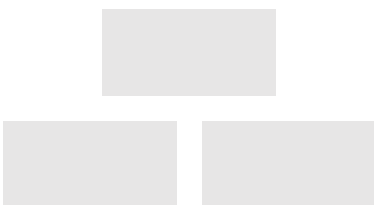




Legend

-  Lidl Ruislip (5 Minutes)

Health Check Assessment



RUISLIP DISTRICT CENTRE June 2024

This Health Check Assessment provides an audit of the vitality and viability of Ruislip District Centre. It is based on the key Health Check Indicators Assessment set out in the Planning Practice Guidance [Town Centres and Retail] (PPG) (Para 006, Ref: 2b-006-20190722). Whilst these are not explicitly referenced in the NPPF, the practice guidance on impact and the sequential approach continues to apply.

The PPG advises that the likely impact of new development needs to be examined against the current vitality and viability of existing centres based on a series of key indicators, and that the Health Check Assessment criteria continue to be applied as best practice.

Ruislip District Centre falls within the administrative boundary of Hillingdon Council. The Local Development Plan for Ruislip consists of the London Plan 2021, Local Plan Part 1 (Strategic Policies), Local Plan Part 2 (Development Management Policies) and a number of supplementary planning documents. The location, layout and boundary of the centre can be found in the Policies Maps.

INTRODUCTION

Ruislip District Centre is located approximately 500m to the east of the site. The centre stretches from Bury Street (A4180) to the north towards Ruislip Station (Underground) to the south, on West End Road. An extract of the Ruislip District Centre area based on the Local Planning Authority's Adopted Proposals Map can be found at Figure 1, below.

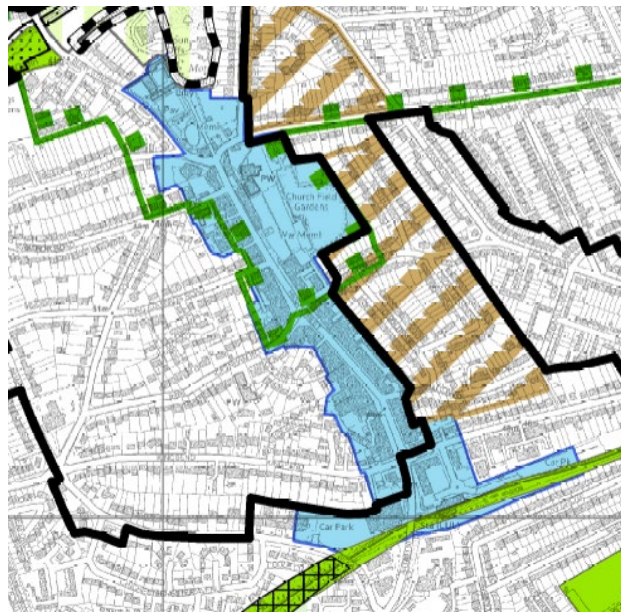


Figure 1. Ruislip District Centre Area (Blue area)

DIVERSITY OF USES

Table 1 below highlights the composition of the Town Centre, as assessed by Rapleys, following an in-person to the centre on 9th June 2024.

Table 1. Diversity of Uses within Ruislip District Centre

Category	Number of Units	%
Convenience	16	9%
Comparison	51	30%

Retail Services	33	19%
Leisure Services	35	20%
Financial and Business Services	14	8%
Vacant	7	4%
Other	15	9%
Total	171	100%

Source: Based on Rapleys' Health Check Survey and Experian GOAD

The vitality and viability of centres depend to a large extent on the quality and variety of retailers represented, with national retailers considered particularly important to attract shoppers. At the same time, independent shops play an important role in distinguishing a centre from its competitors.

Ruislip District Centre currently accommodates a variety of town centre uses such as tattooists, clothing outlets, charity shops, chemists, estate agents, restaurants, cafes and takeaways. With regards to the convenience offering, the centre comprises both national and independent outlets, which are outlined below.

PROPORTION OF VACANCY STREET LEVEL PROPERTY

Table 1 above indicates that at the time of visit, the centre had a vacancy rate of 4%, which is well below the national average of 13.9% (British Retail Consortium, July 2023). Most of the vacant units are small units and spread out across the entirety of the centre. Accordingly, most of these units by virtue of their size and location from each other, cannot reasonably accommodate the development proposed.

The location of these vacant units suggests that these areas of the town centre may have low footfall, which overall may lead to lower turnovers for retailers in these areas.

In addition, three of the vacant units were previously banks; potentially indicating that the vacancy of these units are based on business decisions, rather than fundamental lack of long term interest for these units.

RETAILER REPRESENTATION AND INTENTIONS TO CHANGE REPRESENTATION

The convenience offerings consist of a Waitrose, Iceland, Sainsbury's Local, Tesco Express, and a number of newsagents, greengrocers and bakeries. In terms of comparison goods, the centre contains almost most of the top national multiple retailers (i.e., Boots, Holland & Barrett, Card Factory etc.).

On balance, it is considered that the centre is well served by a number of national multiple retailers.

ACCESSIBILITY

Ruislip District Centre benefits from a safe and convenient movement by foot within the centre. Pedestrian access across the centre is good, with good pavement provisions and ample crossing points across many roads. Permeability and subsequently pedestrian movements, with wider pavements leading to alternative side streets. The road network around the centre does not include segregated cycle ways, however, there is ample cycle parking in multiple locations around the centre.

Ruislip District Centre is served by an Underground Station (Ruislip) servicing the Metropolitan Line. In addition, there are nine bus stops providing up to 5 bus routes to alternative locations.

There are a number of small off-street car parks spread across the centre. These provide circa. 90 spaces. In addition the Waitrose car park can also be used by residents using other district centre facilities.

Based on the above, it is considered that overall, the centre benefits from very good accessibility.

PRECEPTION OF SAFETY AND OCCURANCE OF CRIME

According to the Police.uk Crime Map, for the 12-month period up to April 2024, there were on average 23 per month recorded crimes in and around the centre; mainly ranging from shopfitting to anti-social behaviour.

At the time of the in-person visit, the centre appeared to be a safe environment.

STATE OF THE CENTRE AND ENVIRONMENTAL QUALITY

At the time of the visit pavements and shopfronts were observed to be well-maintained, with a good level of street furniture and public bin provision throughout the centre.



Recent public amenity works to existing pedestrianised areas of the centre, have notably improved the overall shopping environment – and subsequent shopping experience – throughout the centre.

There was some evidence of vandalism (graffiti) and litter, most notably in parts of the centre which were less visited.

CONCLUSION

In terms of the assessment criteria Ruislip District Centre presents a vacancy rate of just 4% and a good mix of retail uses along its main shopping core. Given this it is considered that the vitality and viability of the centre is very good. The centre also benefits from very good levels of accessibility; and good environmental quality. The crime rate in the centre is good. Overall, it is considered that Ruislip District Centre is in good health, with good levels vitality and viability.

ICKENHAM LOCAL CENTRE June 2024

Ickenham Local Centre falls within the administrative boundary of Hillingdon Council. The Local Development Plan for Ruislip consists of the London Plan 2021, Local Plan Part 1 (Strategic Policies), Local Plan Part 2 (Development Management Policies) and a number of supplementary planning documents. The location, layout and boundary of the centre can be found in the Policies Maps.

INTRODUCTION

Ickenham Local Centre is located approximately 1.3km to the south west of the site and is 1.8km to the south of Ruislip District Centre. The centre is centred along Swakeleys Road and Long Lane. An extract of Ickenham Local Centre area based on the Local Planning Authority's Adopted Proposals Map can be found at Figure 2, below.

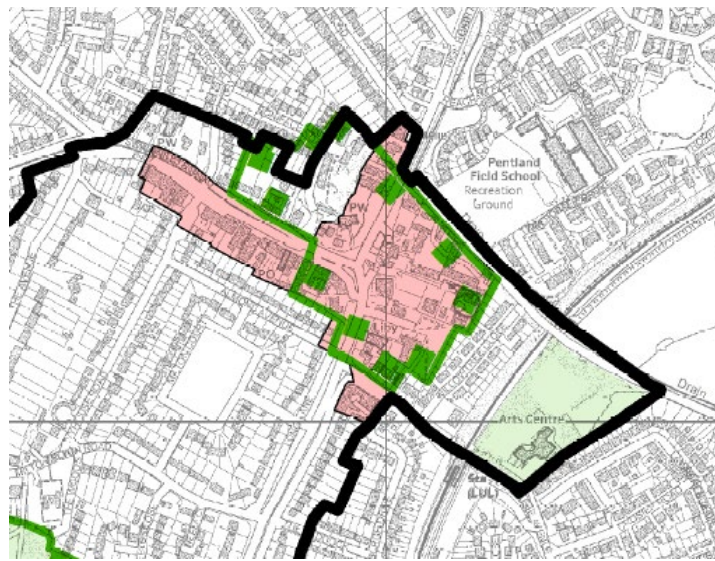


Figure 2. Ickenham Local Centre Area (Pink area)

DIVERSITY OF USES

Table 2 below highlights the composition of the Town Centre, as assessed by Rapleys, following an in-person to the centre on 9th June 2024.

Table 2. Diversity of Uses within Ickenham Local Centre

Category	Number of Units	%
Convenience	8	10%
Comparison	13	17%
Retail Services	18	23%
Leisure Services	16	21%
Financial and Business Services	6	8%
Vacant	1	1%
Other	15	19%
Total	77	100%

Source: Based on Rapleys' Health Check Survey and Experian GOAD.

The vitality and viability of centres depend to a large extent on the quality and variety of retailers represented, with national retailers considered particularly important to attract shoppers. At the same time, independent shops play an important role in distinguishing a centre from its competitors.

The centre currently accommodates local retail centre uses such as small format convenience stores, a pharmacy and other comparison and retail services. There are 8 convenience retail units in the centre, primarily catering for local top-up shopping trips.

PROPORTION OF VACANCY STREET LEVEL PROPERTY

Table 2 above indicates that at the time of visit, the centre had a vacancy rate of 1%, which is below the national average of 13.9% (British Retail Consortium, July 2023).

RETAILER REPRESENTATION AND INTENTIONS TO CHANGE REPRESENTATION

The convenience offerings identified are a Co-op and a number of independent stores including a bakers and butchers.

Comparison retailers are mainly local independent retailers. This low representation in national multiple retailers could be due to the limited size of available units within the centre, and the relative availability of suitable units within Ickenham Local Centre and other nearby centres.

ACCESSIBILITY

Ickenham Local Centre benefits from a safe and convenient movement by foot within the centre. Pedestrian access across the centre is good, with good pavement provisions and ample crossing points across many roads. Permeability and subsequently pedestrian movements, with wider pavements leading to alternative side streets. The road network around the centre does not include segregated cycle ways, however, there is ample cycle parking in multiple locations around the centre.

The centre benefits from on-street and off-street parking; in addition to three bus stops providing two routes to alternative local locations. Overall, for a centre of its size, it is considered that Ickenham Local Centre benefits from good levels of accessibility.

PERCEPTION OF SAFETY AND OCCURANCE OF CRIME

According to the Police.uk Crime Map, for the 12-month period up to April 2024, there were on average 7 per month recorded crimes in and around the centre; mainly ranging from shopfitting to anti-social behaviour.

At the time of the in-person visit, the centre appeared to be a safe environment.

STATE OF THE CENTRE AND ENVIRONMENTAL QUALITY

At the time of the visit pavements and shopfronts were observed to be somewhat maintained. The majority of store fronts were in good condition. There was little evidence of vandalism (graffiti) or litter. Street furniture provision, including bins, is limited, but available. Overall, it is considered that the centre demonstrates a good level of environmental health.

CONCLUSION

In terms of the assessment criteria, Ickenham Local Centre presents a well above average level of vacant units and does demonstrate a healthy mix of retail types, given this, it is considered that the vitality and viability of the centre is good. Furthermore, the centre benefits from adequate accessibility, a low crime rate and moderate environmental quality. Given this, it is considered that the centre is in very good health.

RUISLIP MANOR TOWN CENTRE JUNE 2024

Ruislip Manor Town Centre falls within the administrative boundary of Hillingdon Council. The Local Development Plan for Ruislip consists of the London Plan 2021, Local Plan Part 1 (Strategic Policies), Local Plan Part 2 (Development Management Policies) and a number of supplementary planning documents. The location, layout and boundary of the centre can be found in the Policies Maps.

INTRODUCTION

Ruislip Manor Town Centre is located approximately 1.3km to the east of the site and is centred along Victoria Road. An extract of the Ruislip Manor Centre area based on the Local Planning Authority's Adopted Proposals Map can be found at Figure 3, below.

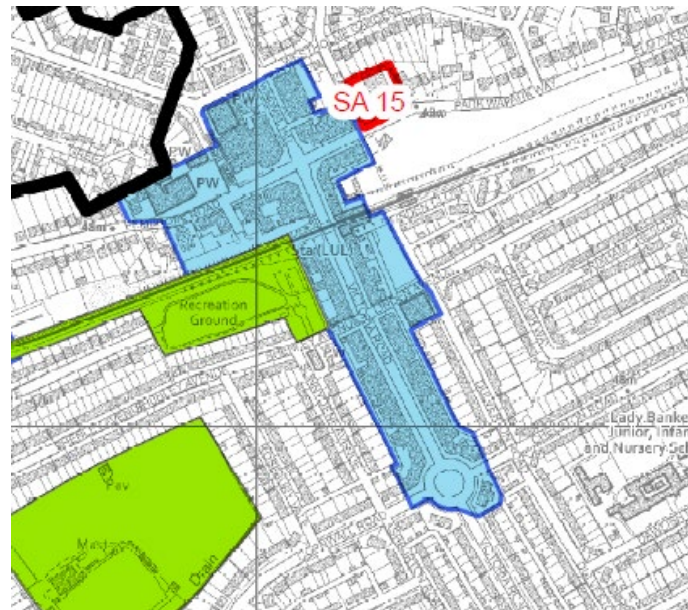


Figure 3. Ruislip Manor Local Centre (Blue area)

DIVERSITY OF USES

Table 3 below highlights the composition of Ruislip Manor Centre, as assessed by Rapleys.

Table 3. Diversity of Uses with Ruislip Manor District Centre		
Category	Number of Units	%
Convenience	12	8%
Comparison	36	24%
Retail Services	26	17%
Leisure Services	36	24%
Financial and Business Services	10	7%
Vacant	10	7%
Other	21	14%
Total	151	100%

Source: Based on Rapleys' Health Check Survey and Experian GOAD.

The vitality and viability of centres depend to a large extent on the quality and variety of retailers represented, with national retailers considered particularly important to attract shoppers. At the same time, independent shops play an important role in distinguishing a centre from its competitors.

The centre currently accommodates town centre uses such as such as Tesco Express and Budgens stores, together with a number of small format convenience stores, barbers, pharmacies, takeaways and other comparison and retail services.

PROPORTION OF VACANCY STREET LEVEL PROPERTY

Table 3 above indicates that at the time of visit, the centre had a vacancy rate of 10%, which is below the national average of 13.9% (British Retail Consortium, July 2023). The largest unit within the centre is a furniture store at 570sqm. Most retail units (90+%) range from 50 – 300sqm.

RETAILER REPRESENTATION AND INTENTIONS TO CHANGE REPRESENTATION

The convenience offerings identified are the existing Tesco Express, Budgens, independent convenience stores and a Post Office.

ACCESSIBILITY

Ruislip Manor Town Centre benefits from a safe and convenient movement by foot within the centre. Pedestrian access across the centre is good, with good pavement provisions and ample crossing points across many roads. Permeability and subsequently pedestrian movements, with wider pavements leading to alternative side streets. The road network around the centre does not include segregated cycle ways, however, there is ample cycle parking in multiple locations around the centre.

The centre benefits from on-street and off-street parking; in addition to three bus stops providing two routes to alternative local locations. The centres is also serviced by a Underground Station (Ruislip Manor). Overall, for a centre of its size, it is considered that Ruislip Manor Town Centre benefits from good levels of accessibility.

PRECEPTION OF SAFETY AND OCCURANCE OF CRIME

The centre falls within the Great Manchester Constabulary area. Based on data from the Police.uk website, there are few recorded crimes within the town centre over the past 12 months. However, this may be due to lack of recorded data rather than no crimes being committed. Overall, the centre appears to offer a safe environment with well-lit pavements and unobstructed pedestrian paths through the centre.

STATE OF THE CENTRE AND ENVIRONMENTAL QUALITY

At the time of the visit pavements and shopfronts were observed to be somewhat maintained. The majority of store fronts were in good condition. There was little evidence of vandalism (graffiti) or litter. Street furniture provision, including bins, is limited, but available. Overall, it is considered that the centre demonstrates a good level of environmental health.

CONCLUSION

In terms of the assessment criteria, Ruislip Manor Town Centre presents a significantly below average vacancy level of vacant and does demonstrate a healthy mix of retail types, given this, it is considered that the vitality and viability of the centre is good. Furthermore, the centre benefits from adequate accessibility, a low crime rate and good environmental quality. Given this, it is considered that the centre is in very good health.

Retail Impact Tables



Table 1: Population Forecast for 5 Minute Drive Time Catchment

Year	2022	2023	2024	2025	2026	2027	2028	2029
Catchment Area	18,853	19,084	19,088	19,097	19,119	19,142	19,137	19,132

Notes

Figures Provided by Experian Micromarketer (June 2024)

Table 2a: Convenience Expenditure Per Capita

	2022	2023	2024	2025	2026	2027	2028	2029
Expenditure (£) (with SFT)	£2,557	£2,480	£2,468	£2,463	£2,463	£2,463	£2,463	£2,463
Expenditure (£) (minus SFT)	£2,432	£2,364	£2,340	£2,325	£2,320	£2,315	£2,310	£2,308
SFT Expenditure (£)	£125	£117	£128	£138	£143	£148	£153	£155

Table 2b: Comparison Expenditure Per Capita

	2022	2023	2024	2025	2026	2027	2028	2029
Expenditure (£) (with SFT)	£3,728	£3,605	£3,562	£3,658	£3,771	£3,888	£4,009	£4,133
Expenditure (£) (minus SFT)	£2,848	£2,783	£2,696	£2,725	£2,791	£2,858	£2,926	£3,001
SFT Expenditure (£)	£880	£822	£865	£933	£981	£1,030	£1,082	£1,132

Assumptions Regarding Available Expenditure on Convenience Goods

Year	2022	2023	2024	2025	2026	2027	2028	2029
Growth in Expenditure (%)		-3.00%	-0.50%	-0.20%	0.00%	0.00%	0.00%	0.00%
Non store spend (SFT) (%)	4.90%	4.70%	5.20%	5.60%	5.80%	6.00%	6.20%	6.30%

Assumptions Regarding Available Expenditure on Comparison Goods

Year	2022	2023	2024	2025	2026	2027	2028	2029
Growth in Expenditure (%)		-3.30%	-1.20%	2.70%	3.10%	3.10%	3.10%	3.10%
Non store spend (SFT) (%)	23.60%	22.80%	24.30%	25.50%	26.00%	26.50%	27.00%	27.40%

Notes

2022 Price Base Year Convenience Expenditure - Experian Micromarketer (June 2024)

Growth Rates - Experian Retail Planner Briefing Note 21 (February 2024) - Figure 1a

Special Forms of Trading (SFT) - Experian Retail Planner Briefing Note 21 (February 2024) - Appendix 3

Table 3a: Total Convenience Goods Expenditure

Year	2024	2025	2026	2027	2028	2029
Expenditure (£m) (with SFT)	£47.11	£47.04	£47.09	£47.15	£47.13	£47.12
Expenditure (£m) (minus SFT)	£44.66	£44.40	£44.36	£44.32	£44.21	£44.15
SFT Expenditure (£m)	£2.45	£2.63	£2.73	£2.83	£2.92	£2.97

Notes

Source - Tables 1 & 2

Table 3b: Total Comparison Goods Expenditure

Year	2024	2025	2026	2027	2028	2029
Expenditure (£m) (with SFT)	£67.99	£69.85	£72.10	£74.43	£76.71	£79.07
Expenditure (£m) (minus SFT)	£51.47	£52.04	£53.36	£54.70	£56.00	£57.41
SFT Expenditure (£m)	£16.52	£17.81	£18.75	£19.72	£20.71	£21.67

Notes

Source - Rapleys LLP Tables 1 & 2

Table 4: Proposed Foodstore Turnover

Proposed Foodstore					
	Total Net Sales Floorspace (sq.m)	Benchmark Turnover (£/sq.m)	Total Store Turnover 2022 (£m)	Total Store Turnover 2024 (£m)	Total Store Turnover 2029 (£m)
Convenience	974	£10,680	£10.40	£10.13	£10.21
Comparison	243	£2,324	£0.56	£0.54	£0.61
Total	1,217	-	£10.97	£10.68	£10.82

Assumptions Regarding Sales Density Growth Rate

	2022	2023	2024	2025	2026	2027	2028	2029
Convenience Growth Rate (%)		-2.5%	-0.1%	0.0%	0.2%	0.2%	0.2%	0.2%
Comparison Growth Rate (%)		-1.2%	-2.6%	1.5%	2.6%	2.6%	2.6%	2.6%

Notes

Benchmark Turnover - Sourced from GlobalData (December 2023). Price Base Adjusted from 2023e to 2022. Experian Retail Planner Briefing Note 21 (February 2024) - Appendix 4b

Adjusted for Density Growth - Experian Retail Planner Briefing Note 21 (February 2024) - Figure 4a & 4b

Table 5a: Available Convenience Expenditure within Catchment

	2024	2029
Catchment Area Available Expenditure (£m)	£44.66	£44.15
Convenience Turnover of the Proposed Store (£m)	£10.13	£10.21
Percentage of Total Available Convenience Expenditure (%)	23%	23%
Expenditure Remaining (£m)	£34.53	£33.94

Table 5b: Available Comparison Expenditure within Catchment

	2024	2029
Catchment Area Available Expenditure (£m)	£51.47	£57.41
Comparison Turnover of the Proposed Store (£m)	£0.54	£0.61
Percentage of Total Available Convenience Expenditure (%)	1%	1%
Expenditure Remaining (£m)	£50.92	£56.80

Table 5c: Available Convenience and Comparison within Catchment

	2024	2029
Catchment Area Available Expenditure (£m)	£96.12	£101.56
Turnover of the Proposed Store (£m)	£10.68	£10.82
Percentage of Total Available Expenditure (%)	11%	11%
Expenditure Remaining (£m)	£85.45	£90.73

Notes

Available expenditure excludes SFT

Tables 3 & 4

Table 6: Existing Stores Benchmark Turnovers (£m)

LOCATIONS	Convenience Turnover 2024 (£m)	Comparison Turnover 2024 (£m)	Convenience & Comparison Turnover 2024 (£m)	Convenience Turnover 2029 (£m)	Comparison Turnover 2029 (£m)	Convenience & Comparison Turnover 2029 (£m)
RUISLIP DISTRICT CENTRE						
Iceland	£4.84	£0.04	£4.88	£4.88	£0.05	£4.93
Sainsbury's Local	£2.87	£0.48	£3.35	£2.90	£0.54	£3.44
Tesco Express	£3.77	£0.61	£4.38	£3.80	£0.69	£4.49
Waitrose	£16.21	£2.84	£19.05	£16.34	£3.19	£19.54
Other Convenience Stores	£5.19	£0.60	£5.79	£5.24	£0.67	£5.91
Other Comparison Stores	£0.00	£27.29	£27.29	£0.00	£30.70	£30.70
RUISLIP DISTRICT CENTRE TOTAL	£32.89	£31.86	£64.75	£33.16	£35.83	£68.99
ICKENHAM LOCAL CENTRE						
Co-op	£1.05	£0.16	£1.21	£1.06	£0.18	£1.24
Other Convenience Stores	£2.40	£0.13	£2.52	£2.42	£0.14	£2.56
Other Comparison Stores	£0.00	£4.20	£4.20	£0.00	£4.72	£4.72
ICKENHAM LOCAL CENTRE TOTAL	£3.45	£4.48	£7.93	£3.48	£5.04	£8.51
RUISLIP MANOR TOWN CENTRE						
Budgens	£0.69	£0.10	£0.79	£0.69	£0.11	£0.81
Tesco Express	£4.05	£0.66	£4.71	£4.09	£0.74	£4.82
Other Convenience Stores	£3.05	£0.45	£3.51	£3.08	£0.51	£3.59
Other Comparison Stores	£0.00	£15.67	£15.67	£0.00	£17.62	£17.62
RUISLIP MANOR TOWN CENTRE TOTAL	£7.79	£16.88	£24.67	£7.86	£18.98	£26.84
OTHER LOCATIONS						
Aldi, Victoria Retail Park, Ruislip	£11.70	£1.14	£12.84	£11.80	£1.28	£13.07
Aldi, Field End Road, Pinner	£9.66	£0.94	£10.60	£9.74	£1.06	£10.80
Asda, Old Dairy Lane, Ruislip	£39.11	£7.98	£47.09	£39.42	£8.98	£48.40
Local Convenience Shops	£1.17	£0.00	£1.17	£1.18	£0.00	£1.18
Local Comparison Shops	£0.00	£1.15	£1.15	£0.00	£1.30	£1.30
OTHER LOCATIONS TOTAL	£61.64	£11.21	£72.85	£62.13	£12.61	£74.74
ALL TOTALS	£105.78	£64.42	£170.20	£106.62	£72.46	£179.08

Notes

Benchmark Turnover for named stores - Sourced from GlobalData (December 2023). Price Base Adjusted from 2023e to 2022. Experian Retail Planner Briefing Note 21 (February 2024) - Appendix 4b

Adjusted for Density Growth - Experian Retail Planner Briefing Note 21 (February 2024) - Figure 4a & 4b

Assessment years: Base year - 2024. Design year - 2029

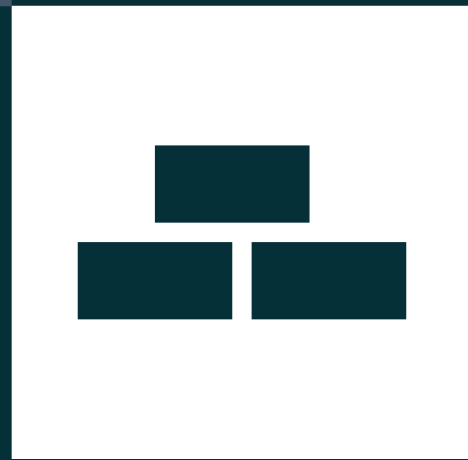
Gross Floorspace taken from Experian GOAD and VOA.

Assumptions Regarding Sales Density Growth Rate

	2025	2026	2027	2028	2029
Convenience Growth Rate (%)	0.0%	0.2%	0.2%	0.2%	0.2%
Comparison Growth Rate (%)	1.5%	2.6%	2.6%	2.6%	2.6%

Table 7: Trade Diversion & Impact Patterns (£m) (%)

Zone 1 - Middlebrough Central	Assessment Years						Proposed Lidl Store						Total Diversion				Impact (%)		
	Pre-Development Conv. Turnover 2024 (£m)	Pre-Development Comp. Turnover 2024 (£m)	Total Conv. & Comp. Turnover 2024 (£m)	Pre-Development conv. Turnover 2028 (£m)	Pre-Development Comp. Turnover 2028 (£m)	Total Conv. & Comp. Turnover 2028 (£m)	Trade Diversion Pattern		2024		2028		2024	2029	2024	2029	2024	2029	
							Convenience (%)	Comparison (%)	Convenience (£m)	Comparison (£m)	Convenience (£m)	Comparison (£m)	Conv. & Comparison Goods (£m)	Conv. & Comparison Goods (£m)	Total Post Development Turnover (£m)	Total Post Development Turnover (£m)			
RUSLIP DISTRICT CENTRE																			
Islands	£4.84	£0.04	£4.88	£4.88	£0.05	£4.93	3.50%	0.00%	£0.35	£0.00	£0.38	£0.00	£0.35	£0.38	£4.53	£4.53	7.20%	7.25%	
Sainsbury's Local	£2.87	£0.48	£3.35	£2.90	£0.54	£3.44	3.00%	5.00%	£0.30	£0.03	£0.31	£0.03	£0.32	£0.34	£3.02	£3.10	9.88%	9.91%	
Tesco Express	£3.77	£0.61	£4.38	£3.80	£0.69	£4.49	3.50%	5.00%	£0.35	£0.03	£0.38	£0.03	£0.38	£0.39	£4.00	£4.10	8.72%	8.85%	
Waitrose	£16.21	£2.84	£19.05	£16.34	£3.18	£19.54	17.75%	10.00%	£1.86	£0.08	£1.81	£0.08	£1.85	£1.87	£17.20	£17.68	9.73%	9.59%	
Other Convenience Stores	£5.18	£0.80	£5.98	£5.24	£0.87	£6.11	4.50%	0.00%	£0.41	£0.00	£0.41	£0.00	£0.41	£0.41	£5.38	£5.50	7.00%	6.92%	
Other Comparison Stores	£0.93	£27.29	£28.22	£0.00	£30.70	£30.70	0.00%	25.00%	£0.00	£0.14	£0.00	£0.14	£0.14	£0.15	£27.18	£30.54	0.50%	0.50%	
RUSLIP DISTRICT CENTRE TOTAL	£32.89	£31.86	£64.75	£33.16	£35.83	£68.99	31.75%	45.00%	£3.22	£0.24	£3.24	£0.28	£3.48	£3.92	£61.29	£65.47	5.35%	5.10%	
ICKENHAM LOCAL CENTRE																			
Co-op	£1.05	£0.16	£1.21	£1.06	£0.18	£1.24	1.00%	0.00%	£0.10	£0.00	£0.10	£0.00	£0.10	£0.10	£1.11	£1.13	8.30%	8.27%	
Other Convenience Stores	£2.40	£0.13	£2.52	£2.42	£0.14	£2.56	1.00%	0.00%	£0.10	£0.00	£0.10	£0.00	£0.10	£0.10	£2.42	£2.48	4.01%	3.99%	
Other Comparison Stores	£0.00	£4.20	£4.20	£0.00	£4.72	£4.72	0.00%	5.00%	£0.00	£0.03	£0.00	£0.03	£0.03	£0.03	£4.17	£4.69	0.65%	0.65%	
ICKENHAM LOCAL CENTRE TOTAL	£3.45	£4.49	£7.93	£3.48	£5.04	£8.51	2.00%	5.00%	£0.20	£0.03	£0.20	£0.03	£0.23	£0.23	£7.70	£8.28	2.90%	2.78%	
RUSLIP MAJOR TOWN CENTRE																			
Budgens	£0.69	£0.10	£0.79	£0.69	£0.11	£0.81	0.75%	0.00%	£0.08	£0.00	£0.08	£0.00	£0.08	£0.08	£0.71	£0.73	9.65%	9.51%	
Tesco Express	£4.05	£0.69	£4.74	£4.09	£0.74	£4.82	4.00%	2.00%	£0.41	£0.01	£0.41	£0.01	£0.42	£0.42	£4.28	£4.40	8.84%	8.72%	
Other Convenience Stores	£3.05	£0.45	£3.51	£3.08	£0.51	£3.59	1.00%	0.00%	£0.16	£0.00	£0.16	£0.00	£0.16	£0.16	£3.41	£3.49	2.89%	2.85%	
Other Comparison Stores	£0.00	£15.67	£15.67	£0.00	£17.62	£17.62	0.00%	10.00%	£0.00	£0.05	£0.00	£0.05	£0.05	£0.05	£15.61	£17.50	0.35%	0.35%	
RUSLIP MAJOR TOWN CENTRE TOTAL	£7.79	£16.89	£24.67	£7.86	£18.98	£26.84	5.75%	12.00%	£0.68	£0.07	£0.59	£0.07	£0.65	£0.66	£24.02	£26.16	2.93%	2.48%	
OTHER LOCATIONS																			
Asda, Victoria Retail Park, Ruslip	£11.70	£1.14	£12.84	£11.80	£1.28	£13.07	16.00%	9.00%	£1.62	£0.05	£1.63	£0.05	£1.67	£1.69	£11.17	£11.38	13.01%	12.92%	
Asda, Field End Road, Pinner	£9.88	£0.94	£10.82	£9.74	£1.06	£10.80	16.00%	9.00%	£1.62	£0.05	£1.63	£0.05	£1.67	£1.69	£8.93	£9.11	15.75%	15.65%	
Asda, Old Dairy Lane, Ruslip	£39.11	£7.98	£47.09	£39.42	£8.98	£48.40	17.50%	10.00%	£1.77	£0.05	£1.79	£0.05	£1.83	£1.85	£45.28	£46.55	3.88%	3.82%	
Local Convenience Shops	£1.17	£0.00	£1.17	£1.18	£0.00	£1.18	1.00%	0.00%	£0.10	£0.00	£0.10	£0.00	£0.10	£0.10	£1.07	£1.08	8.67%	8.67%	
Local Comparison Shops	£0.00	£1.15	£1.15	£0.00	£1.30	£1.30	0.00%	0.00%	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.15	£1.30	0.00%	0.00%	
OTHER LOCATIONS TOTAL	£61.64	£11.21	£72.85	£62.13	£12.61	£74.74	90.50%	28.00%	£5.12	£0.15	£5.18	£0.17	£5.27	£5.33	£67.88	£69.41	7.23%	7.13%	
ALL TOTALS	£106.79	£64.42	£170.20	£106.82	£72.48	£179.08	90.00%	90.00%	£9.12	£0.48	£9.18	£0.65	£9.61	£9.74	£160.59	£169.34	6.66%	6.44%	
INFLOW (K/£M)							10.00%	10.00%	£1.01	£0.05	£1.02	£0.08							
OVERALL TOTAL (K/£M)							100.00%	100.00%	£10.13	£0.54	£10.21	£0.81							



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