ACCESSIBLE RETAIL

WRITTEN STATEMENT FOR M89

Introduction

Accessible Retail is competent on the issues raised by the Panel as, although we represent out of town retail parks and warehouses, our members are major retailers, developers and owners/investors with substantial interests in both out-of-town and town centres

Panel Question

M89. Would policies SD6, SD7, SD8, SD9 and E9B provide an effective strategic framework for the preparation of local plans and neighbourhood plans relating to town centres and all types of main town centre use development (including bulky goods retailing), that is consistent with national policy?

Written Statement

In short, the strategic framework proposed is unlikely to be effective. The Plan's policy framework for retail does not acknowledge that the operational requirements now needed by multiple retailers to enable them to maintain economically sustainable businesses in the face of competition from on-line traders (now reached 17% of annual trade by value and rising) have changed in a fundamental way.

To deal with this competition, many of these retailers are having to restructure their operational formats as London's local high streets and town centres are no longer sustainable trading locations. This is because they have the following major disadvantages: high operational costs; day long congestion; few premises of the size and configuration they require with dedicated service yards for deliveries; and adjacent cheap/free car parking for customers especially to collect bulky goods.

Consequently, they are moving out of town where the efficient space, lower costs, better accessibility and adequate parking needed to survive online competition can be obtained. Notably, the jobs provided by these retailers are moving with them.

In short, there has been a permanent structural shift from secondary to primary centres and from small stores to larger stores. The retail landscape is permanently changed and to meet the on-going needs of retailers and their customers in London, the new London Plan needs to take account of this new market situation. No longer is a 'one size fits all' approach (i.e. town centres and high streets) in the Plan's retail policies appropriate in the new multi-channel retail market.

Given this, the policy framework which discourages out of town retail parks in the Plan is unrealistic and will inhibit the future of retailing and therefore, the services it provides to its customers. This undesirable outcome is further exacerbated by the housing policies in the Plan which identify retail parks as a source for housing and/or mixed use, describing them as underdeveloped, a description which further underlines the Plan’s failure to understand the new business model needed by multiple retailers.

It is not only retail’s customers who will suffer, but also Londoners generally as the loss of retail parks will result in a concomitant loss of important job opportunities. This loss would result in a reduction in the total pool of employment available to Londoners and should be viewed in the context that nationally (including London) retail employment has fallen by over 60,000 jobs in last few years and is projected to lose a further 175,000 in 2019-2020.

Also damaging is the type of jobs which will be lost as the retail park sector offers flexible working opportunities (part time and variable hours) and a wide range of opportunities needing different skills, attributes not available in all London employment sectors;

In summary, a change is needed in the Plan’s approach to formulating its retail polies which recognises that providing for future needs now requires a multi-locational approach including retail parks rather than the current solely town centre led one. That means a Plan which recognises this permanent structural change and ensures that investment can flow to the stronger centres whether town centre, out of town or high street.

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