



Our ref: 3598

The London Plan EIP

Matters 89-90

Written Statement

on behalf of

Halfords Limited (ID: 3189)

28th February 2019

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Written Statement

Introduction

1. This Written Statement is prepared on behalf of Halfords Limited ('Halfords') in respect of Matters 89-90 — 'Retailing'. Halfords submitted detailed written representations in respect of draft Policies H1 and SD8 in February 2018 which set out various suggested changes to the draft policies. Halfords was subsequently identified as a participant in the EIP in November 2018 and attended the hearing for Matter 18 (Housing Strategy) on 6th February 2019.

 2. This Written Statement relates to Policy SD7 (previously SD8) and Policy E9B, which, amongst other things, target non-central retail formats for residential development. Halfords has had reference to the Mayor's Minor Suggested Changes to the two policies in preparing the Statement.

 3. Halfords does not consider that Policy SD7 and E9B provide an appropriate basis for the preparation of development plans for all types of main town centre uses, specifically bulky goods retailing. Indeed, Halfords consider:
 - a) that the policies will accelerate the dearth of bulky goods retailing in London in favour of residential use (Matter 89); and
 - b) that the draft plan does not sufficiently accommodate the needs of the bulky goods retail sector (Matter 90 a)).

 4. As highlighted in its Written Statement for Matter 18, Halfords is a long-established retailer of bulky comparison goods. Its retail format is reliant on premises having sufficient floorspace to enable the display of such items. Its format is also reliant upon stores having sufficient parking spaces and servicing capability to enable the transportation of bulky items.
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5. Halfords acknowledges the need for homes and supports mixed-use development and has tried to established means to reconsider its retailing format so that it might be capable of being accommodated on smaller floorplates or through a trade counter model (to function on more-often-than-not protected employment land), however its core business is that in its retail stores where customers like to be able to view and compare products. Like other bulky goods retailers, Halfords' stores function with genuine size and operational requirements, as previously documented in its representations.
6. Halfords is, of course, not the only retailer that is reliant on these trading formats in order for its business to be undertaken. Other examples include carpet, furniture and DIY retailers who all have genuine locational and operational requirements. Halfords is being edged out of London in its tenanted stores as a result of its landlords' unwillingness to renew leases in favour of premises being redeveloped for residential use, which is seen as more lucrative proposition.
7. Halfords is aware that there has been a trend over the last decade or so whereby some premises on retail parks have been occupied by retailers not trading in bulky goods and not reliant on the established store format and therefore much more likely to compete with established allocated centres retailing in comparable products. These softer goods retail warehouse stores generate higher turnovers and are capable of paying higher rents – something that again is attractive to landlords. This trend, when seen against the backdrop of more challenging trading conditions on the high street and the seemingly unstoppable switch towards online retail sales and the affect that this has had, may have influenced the Mayor's apparent willingness to see the wholesale sacrifice of the format through his draft policies.
8. Non-central retailing has often had a bad press with planners and sometimes seen as a negative influence. It is clear that the draft policies see the format as a soft target. This is despite Halfords' network of stores being developed under well-established

planning tests (the sequential and impact tests) as opposed to some sort of unregulated roll-out. Halfords' proposed changes to the policies in its representations of February 2018 provide an effective framework and policy protection for those retailers with genuine locational requirements (*"Operators must provide evidence of their retail/leisure model and demonstrate flexibility in format and scale"*).

9. As raised in Halfords' verbal representations at the hearing for Matter 18, it is important that Londoners have access to all forms of retailing, including bulky goods, and by reducing the supply of such stores or pushing access to them to the fringes of London or beyond is not sustainable. Given that bulky items are often 'big ticket' items, customers tend to want to see, test and compare products in person. This is why the bulky goods sector is less reliant on internet sales and requires physical stores in order to function.
10. The reduction in the pool of stores or retail parks and the increased distances in order to access them means that it is the consumer and consumer choice that lose out. As a real life example, imagine if you will a situation in the not-too-distant future whereby a couple purchase a residential apartment built on a former retail park within central London. They then have to travel by car a convoluted 50+ mile round trip in order to visit a depleted stock of bulky goods stores to view, compare and purchase furniture for it. Multiply this by the number of residents occupying a 500 unit scheme and this adds up to a significant number of trips. Halfords consider that this highly realistic future scenario is significantly at odds with each of the three overarching sustainable development objectives (economic, social and environmental).
11. Halfords is conscious of the verbal representations of the Mayor's Planning Officer at the hearing for Matter 18, who stated (along the lines of):
 - a) The boroughs can set their own policies; and
 - b) The boroughs can allocate and protect their retail parks.

12. Halfords consider these suggestions to be implausible as the trend highlighted is consistent across the whole of London. A number of London Boroughs are being sanctioned under the 2018 Housing Delivery Test, so why would they chose to protect sites accommodating unallocated main town centre uses unless they were guided by the Mayor to do so? Halfords reiterate that it is aware of only one retail park within the M25 that is allocated for retailing (the rest generally occupying 'white land') and one pipeline scheme designed for the purpose of the format. Halfords provided an 'evidence base' in paragraph 4.5 of its Written Representations setting out a significant list of case studies to back-up its concerns. Halfords consider that there needs to be a proper recognition of the bulky goods format within the London Plan which steps away from the negative phrasing ('firmly resisting'/'discouraging') and for there to be a proper planning strategy for it – one that is underpinned by a sound 'evidence base' that considers all forms of main town centre uses (Matter 90, part a)).
13. The following contains Halfords' specific statement on the modified draft policies SD8 (previously SD7) and E9B and explains why they do not provide an effective strategy. Further suggested changes (to those in Halfords' Written Representations) are set out.

Draft Policy SD7

14. The highly negative (albeit watered-down through the modification) phrasing of Part A, 2) of the policy is telling. The policy should be amended to say "*apply the sequential test...*" so to be consistent with NPPF paragraph 86.
15. Halfords consider Part A 3) should be amended to acknowledge that the impact test should only be required for proposals exceeding 2,500 sq.m, unless a borough has adopted a lower threshold trigger.

16. Part A 4) is that which is of most concern. Halfords' Written Representations of February 2018 (see especially page 24) made suggested changes to this part of the policy which is not repeated here.
17. Part B 1A) is a modification and so did not form part of Halfords' previous Written Representations. It is linked to Part 1) of the policy ("*...boroughs should define...*"). Neither provide a strategic framework for local plan preparation for all forms of main town centre uses. So that the policy considers bulky goods retailing, Halfords suggest the following changes in bold text and with the suggested deleted text struck through.

In Development Plans, ~~boroughs should:~~

- 1) ~~define the detailed boundary of town centres in policy maps including the overall extent of the town centre (taking into account consideration associated high streets which have particular economic or social value) along with specific policy related designations such as primary shopping areas, primary and secondary frontages and night time economy in light of demand/capacity assessments for town centre uses and housing~~
boroughs should, taking account of up-to-date evidence, plan for all forms of main town centre uses, including those with specific locational and operational requirements (such as those which cannot be accommodated in town centres). This should include the allocation of specific policy-related designations such as primary shopping areas, primary and secondary frontages and retail warehouse premises operating with genuine locational requirements.

- 1A) consider the protection of out-of-centre high streets as neighbourhood centres, local parades or business areas and develop appropriate policies to support and enhance the role of these high streets, subject to local evidence, recognising the capacity of low-density commercial sites, car parks and retail parks for housing intensification and mixed-use redevelopment (see Policy H1 increasing

housing supply), **unless there are genuine locational and operational reasons for their existence, and in accordance with the test in Part A 4) of this policy.**

18. Halfords also proposes that Part 5) c) of the draft policy be amended to include the words “..subject to the test in Part A 4) of this policy”.

Policy E9B

19. Part BA 8) of draft Policy E9B also seeks to enable the redevelopment of non-central retail sites for mixed-uses and housing intensification. Halfords supports such development *in principle* but not so at the loss of existing retailers who have genuine locational requirements. Therefore, Halfords would also wish that its suggested words “..subject to the test in Part A 4) of this policy” be inserted after the reference to edge and out of centre retail and leisure.

Conclusion

20. The two policies do not plan for, or acknowledge, the locational requirements of all types of main town centre uses. Halfords has developed a network of London stores at considerable expense and through well-established retail tests that is now under serious threat of accelerated store closures. It should not be expected that Halfords be forced, through the draft plan and the economic appetite of its landlords, to close its stores.
21. What is important is for the plan to recognize that both retail formats – in-centre non-bulky retailers and non-central bulky retailers – play a role in serving the shopping needs of Londoners. The policies, as drafted, provide no recognition of this but instead promote the sacrifice of the latter format without any sensible or evidence-based recognition of the implications that this will have, such as:

- Londoners will need to travel further to a diminishing stock and choice of retailers;

- the loss of Halfords' and other bulky retailers' customer base; and
- the loss of jobs in the retailing sector.

22. The changes to the policies, as recommended in this Written Statement and Halfords' previous representations, seek to strike a balance between enabling alternative development on lower density retail sites whilst protecting, and planning for, the bulky goods sector's ability to survive within London. Both sectors should be allowed a fair platform against which to serve their roles in satisfying the demand for both housing growth and for consumers to be able to access to all types of main town centre uses.

(Total words: 1,940)