

ACCESSIBLE RETAIL

WRITTEN STATEMENT FOR M90

Introduction

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

Panel Question

M90. Is the approach to development management set out in policies SD6, SD7, SD8, SD9 and E9BA justified and consistent with national policy and would it be effective in terms of: a) ensuring that identified needs for all forms of main town centre uses, including bulky goods, are accommodated in appropriate locations in accordance with national policy; b) requiring large scale commercial development (over 2,500sqm of A Use Class floorspace) to support the provision of small shops and other commercial units (including “affordable units” where there is evidence of local need); and c) supporting Policy GG4 “delivering the homes Londoners need”?

Written Statement

(a) with regard to bulky goods, town centres are inappropriate locations and the policy should not encourage such development. In town centres the big box format and necessary ground level parking of bulky goods outlets exacerbates congestion, creates a built environment/floor plate incompatible with traditional architecture and massing of buildings in town centres and generates deliveries by very large lorries throughout the day. Overall bulky goods constitute an incongruous operational environment for other town centre businesses and their customers.

In contrast, locating bulky goods traders outside town centres avoids these undesirable placemaking consequences and frees up land used for low value extensive uses and enables more intensive occupiers to replace them thereby creating the value needed for town centre renewal.

(b) given that many multiple traders have already moved out of town because remaining in town centres is unsustainable economically, it is extremely unlikely that they will be able to accommodate the additional call on profitability required by this policy. Large office and residential developments which generate higher values are a much more likely source of such a subsidised approach.

In this context, it should be noted that the value of retail property fell by 7.4% (CBRE) in 2018, with other analysts forecasting a further fall in excess of 40% in 2019-20190. The effects of a fall in value (a 10% drop has been estimated to result in a

£30 billion correction to the UK economy) would be felt beyond the few large retail landlords as the vast majority of high street shops, shopping centres and retail parks are in the hands of small private landlords, local councils and institution investors with the largest three of the latter holding £2.5 billion of shops between them

(c) regarding the Plan's proposal to give support to policies to deliver the homes Londoners need, identifying out of town retail parks as being of low density and car dependent, whilst correct, reveals further failure to understand the operating environment which multiple retailers now need to combat competition from on-line retailing. The retail industry as a whole is under stress and cannot afford to lose significant capacity from the retail parks sector which has proved to be the most economically resilient to the rise of on-line trading.

This policy is prejudicial to retail parks and does not conform with the National Planning Policy Framework which requires LPAs to set policies for the consideration of town centre uses which cannot be accommodated in or adjacent to town centres. Additional support for this view is contained in National Planning Practice Guidance which states it may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses.

In summary, the policies to redevelop retail parks for housing and mixed uses will lead to the following undesirable consequences:-

- a) If more retailers close this will result in a poorer service for customers;
- b) this deterioration in service would be particularly damaging for Londoners as the city is already underprovided with retail parks floor space by comparison with all other parts of the country;
- c) a reduction in floorspace would result in the loss of employment opportunities for Londoners – this would be particularly damaging 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;
- d) air quality and traffic congestion problems in London will rise as white van deliveries by on-line traders continue to increase;
- e) maintaining the existing distribution provision will prove counterproductive as retail park locations form part of the last mile distribution for customers and if this is taken away, it will put even more pressure on an already constrained supply;
- f) as retail park and warehouse retailers typically occupy their premises on longer leases, encouragement in the London Plan to replace retail parks with

high density housing will generally result in retail parks getting redeveloped at the end of the lease without any consideration given to existing use.

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