

28 January 2021

Dear Sir/Madam,

**Supporting Housing Delivery and Public Service Infrastructure**

Response from Accessible Retail

**Introduction**

Accessible Retail (AR), is the trade body which represents the retail parks and warehouses sector of the retail industry. We have over 1200 members comprising retailers, developers, owners/investors and advisers, including most of the major companies active in the sector.

Retail parks and warehouses comprise one of the three major retail sectors. We play a significant role in the economy and many of our members trade across Europe and beyond. The sector accounts for some third of total retail spend and comprises the largest part of investment grade (prime) retail commercial property. Our sector employs some 750,000-800,000 people in the UK.

We welcome the opportunity to respond to this consultation.

**Overarching Comments**

We share the Government’s view set out in Planning White Paper, that the planning system in England needs reform and agree a simpler and faster planning system is needed to support and enable the Government’s aspirations for economic growth, employment creation and the provision of housing, together with appropriate infrastructure.

We support, also, the proposals in the present consultation as further step in achieving this important aim. However, as a retail body, our support is not so much founded on the need to increase the supply of housing (which we recognise), but in the need for retailers owning redundant space to be able to convert it easily and speedily to another use.

The argument for the new PDR in town centres is persuasive as that is where the greatest concentration of redundant retail space exists and the conversion of such space to new residential/mixed use will assist in diversification and repurposing.

However, although formulated principally with town centres in mind, the Consultation makes clear the new PDR will apply to all Class E uses wherever located. This includes out of town retail and for our members, therefore, raises the issue of whether the new PDR should be subject to size limitation.

In our view, this is less an issue for town centres as the space becoming redundant is either small scale standard shop units unlikely to fall outside any limitation or large shopping malls the redevelopment of which would necessitate a full planning application.

Retail parks and warehouses, however, are not so straight forward. Because of their generally large unit size and big box configuration, a size restriction would probably exclude them. The issue arises if there is no restriction. For less efficient parks, the new PDR might be a welcome to facilitate redevelopment, but for parks with a sustainable trading future (the majority), an ability to effect what would likely be piecemeal and incremental change of use without full planning scrutiny including the views of other interests on the park, would not be appropriate. For these parks, change of use, particularly to residential, could undermine the operation of the park as a whole to the detriment of other traders. Key likely issues are traffic conflict between residents and retail customers/supply chain deliveries and complaints from residents about noise, hours of operation etc. To give proper consideration and weight to such issues, would require a full application including consultation with interested parties.

On balance, AR believes the potential threat of uncontrolled change to well established retail parks outweighs the benefit of a speedier more certain PDR process for those parks where redevelopment is being considered.

**Responses to Specific Questions Relevant to AR members**

**Q1. Do you agree that there should be no size limit on the buildings that could benefit from the new permitted development right to change use from Commercial, Business and Service (Class E) to residential (C3)?  
Please give your reasons.**

No, for the reasons cited above.

**Q3.1 Do you agree that in managing the impact of the proposal, the matters set out in paragraph 21 of the consultation document should be considered in a prior approval?  
Please give your reasons.**

Yes. Sound planning practice requires that where impact raises potential issues, the latter are assessed and account taken of them in the planning decision.

**Q3.2 Are there any other planning matters that should be considered?  
Please specify.**

No.

**Q4.1 Do you agree that the proposed new permitted development right to change use from Commercial, Business and Service (Class E) to residential should attract a fee per dwelling house?  
Please give your reasons.**

Yes. A fee will ensure PDR applications are economic to process for local authorities and thereby facilitate effective service delivery.

**Q4.2 If you agree there should be a fee per dwelling house, should this be set at £96 per dwelling house?  
Please give your reasons.**

Yes. Considered against the fee for full residential applications and the lesser work involved for the planning authority, it is proportionate.   
  
**Q5. Do you have any other comments on the proposed right for the change of use from Commercial, Business and Service use class to residential?  
Please specify**

No.

**Q6.1 Do you think that the proposed right for the change of use from the Commercial, Business and Service use class to residential could impact on businesses, communities, or local planning authorities?  
If so, please give your reasons.**

See earlier comments.



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