

18th January 2016

Planning Policy Consultation Team
Department for Communities and Local Government
2 Marsham Street
London
SW1P 4DF

Dear Planning Policy Consultation Team,

ACS (the Association of Convenience Stores) welcomes the opportunity to submit evidence to the Department for Communities and Local Government (DCLG) consultation on proposed changes to the National Planning Policy Framework (NPPF). ACS represents 33,500 local shops across the country including Nisa Local, Spar, Costcutter, Budgens and thousands of independent retailers.

ACS' primary interest in the NPPF centres on sections 23 to 27 on the viability of town centres, this section enshrines the 'town centre first' principle in the national guidance. We continue to monitor the effectiveness of the 'town centre first' principle in driving new retail developments and investments into town centres but do not believe this section of the NPPF requires revision. Our research, 'Retail Planning Decisions Under the NPPF', sets out the concern we have with the implementation of the NPPF at local level and is available [here](#). We continue to have an open dialogue with DCLG Ministers and Officials about the effectiveness of 'town centre first' planning policy.

The convenience sector is a growing part of the grocery market worth £37 billion to the UK economy. Turnover in the convenience sector has also grown by over 5% in the last year. We want to ensure that the planning system enables our members to grow by developing or converting new sites whilst understanding the needs of local communities. Recent policies such as the removal of permitted developments rights for pubs listed as assets of community is a further threat to new developments and innovative businesses entering the high street or local parades.

We support a plan-led system whereby local authorities and communities determine and allocate the best types of sites for development. Since the introduction of the Localism Act 2011, the planning system has been hampered by the lack of robust local plans that are able to direct housing, retail, and transport developments into appropriate locations within communities. This is partly due to a lack of resources and skills in local planning departments to deliver them appropriately, especially when noting the controversial nature of housing provisions within local plans.

The changes proposed in the consultation do not have a direct impact on the convenience sector. However, there are secondary impacts such as fewer opportunities for stores to find developments sites as they are quickly allocated for housing provision. ACS does not have a strong view on timeframes for when land allocated for economic development can be given up but the decision should be informed by a robust assessment of retail need in an area.

The main challenge in the consultation is the definition of "significant and compelling evidence" to justify the retention of employment land. Limited resources in local authorities means there is huge differential in the quality and timeliness of data that local authorities have to hand. This makes setting national timeframes for unused land to be reallocated in the NPPF challenging, and government should instead consider allowing local authorities to set their own timeframes. Convenience store developments, although small, can take a number of years to come forward from securing finance, planning and licensing application

to store opening – this will be even longer for larger retail developments that need time to secure finance.

We believe greater action is needed from Government to resource local authority planning teams with the right resources and skills to deliver good local plans. If paragraph 22 of the NPPF is to be amended, it should encourage local authorities to set sunset clauses in their local plans for how long employment land will be allocated if it has not been developed. ACS welcomes the opportunity to discuss this submission further with DCLG officials.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Lowman', with a long horizontal flourish extending to the right.

James Lowman
Chief Executive