

Client Friends Life Limited
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 Project 88 Bushey Rd_Phase II
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esa

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30th April 2014

Dear Mr Lewis,

Proposed NEXT retail store, 88 Bushey Road, Raynes Park, London, SW20 0JH

Thank you for consulting the Royal Borough of Kingston on the proposal for a 5,970 sqm Next retail store selling homeware and fashion goods at 88 Bushey Road, Raynes Park. Further to your email notification, which we received on 4 April 2014, Kingston Council has reviewed the application in light of the National Planning Policy Framework, and we have concerns that the applicant has not demonstrated full compliance with the requirements of the NPPF.

We note that the application is recommended for approval at the 30th April Committee meeting, and we request that this Council's objection to the application on the grounds set out below is reported to the Planning Committee.

NPPF Paragraph 23 states that Local Planning Authorities should promote competitive town centres and allocate a range of suitable sites to meet the scale and type of retail development that is needed. The NPPF also states (paragraph 24) that Local Planning Authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. Main town centre uses should be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered (our emphasis). The NPPF is clear at paragraph 27 that where a proposal fails to satisfy the sequential test, it should be refused.

Kingston Council has up-to-date plans in the form of an adopted Core Strategy and an adopted Area Action Plan for Kingston Town Centre, and has recently prepared an updated Borough-wide retail study. The AAP (Policy K1) refers to an identified need for new and enhanced retail facilities (50,000sqm gross of comparison goods retail floorspace) and identifies three sites (Proposal Sites 1,2&3) as being appropriate to accommodate a significant proportion of that need.

The 2013 Retail Study has reassessed the need set out in the AAP, and has concluded that the level of need across the Borough remains significant – circa 15,000 sqm gross to 2018 and circa 50,000sqm gross by 2023, and states that the majority of this new floorspace should be directed to Kingston town centre. The Study points to continued strong retailer demand, and the continued qualitative deficiencies in Kingston town centre. The Retail Study concludes that Proposal Sites 1,2&3, which have not come forward for redevelopment, remain appropriate locations to accommodate new retail floorspace. The Retail Study recommends that new retail development should provide larger floorplate units in order to accommodate the space needs of stores wanting to display their full range, stores such as Marks and Spencer who currently trade from split sites in Kingston town centre, and potentially a flagship Next store.

The Council are currently preparing a development framework for the Eden Quarter area (which encompasses AAP Proposal Sites 2 & 3) and have the active support and cooperation of the key landowners. The Council's Retail Study forecast that development in this area would not come forward before 2019/20, but development is now likely to come forward sooner than anticipated, and we expect submission of a planning application in summer 2014 for the comprehensive redevelopment of the Eden Walk Shopping Centre that will involve substantial new retail floorspace. Thus, Next's view that *"in Kingston, it is widely acknowledged that there is pent up retail expenditure demand that cannot be accommodated within the town centre – particularly following the delay of the Eden Quarter proposals (originally led by Hammerson)"* is incorrect in respect of the ability of the town centre to accommodate new retail floorspace. This site, as Next and Merton's consultant's NLP acknowledge, is suitable for the proposed Next store, and likely to be viable and available for a flagship Next store. It is our view that the applicant has not adequately considered the potential of the Eden Walk site to accommodate their store requirement, and the potential for this site needs to be fully assessed.

Whilst we consider the sequential test concerns alone constitute grounds for refusal, we do also have concerns about the impact of the proposal on the neighbouring town centres. Our concerns relate to the potential impact of the proposal on planned public/private investment, on centre vitality and viability and consumer choice. In respect of town centre investment any loss of trade (in this case to an out-of-centre store) would make investment in the centres less likely, and given there is a sequentially preferable option in Kingston town centre the proposal should be considered unacceptable. Whilst the Next store's estimated £13m annual turnover is modest in the context of the turnover of Kingston town centre (£680m), it is significant in the context of centres such as New Malden (£32m), a centre where comparison goods retailing is anchored by the Tudor Williams Department Store. However, the impact of

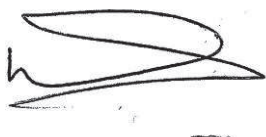
trade diversion to Next would be most keenly focused on the retailers selling goods of similar range to Next. Thus, the large number of homeware/fashion stores in Kingston, and the Tudor Williams Department Store in New Malden would experience harmful impact through trade diversion to an out-of-centre Next store with free parking. We question the reliability of assessments that estimate that just £1.4m to £2.6m of the total £13m turnover will divert from Kingston, and only £0.2m would divert from New Malden. These figures are likely to be underestimates given that the highest concentration of comparator stores are located in Kingston, and New Malden is the centre closest to the proposed store. Kingston and New Malden are therefore likely to experience the bulk of the trade diversion.

We are concerned that the trade diverted from centres in Kingston Borough, and the £4m diversion from Wimbledon will have a harmful impact on the vitality and viability of these centres by threatening the viability of the stores that will experience the loss of trade. Whilst the impact may not threaten the closure of these stores, it will inevitably result in less money being available for future investment in the stores, with consequential impact on the centres that they anchor.

Thus in conclusion, Next's sequential assessment has failed to fully assess a key town centre site that could be capable of accommodating a flagship Next store - the planned redevelopment of Eden Walk Shopping Centre (Kingston Town Centre Area Action Plan Proposal Site 2). The impact assessment underplays the trade loss likely to be experienced by New Malden and Kingston town centres, and trade diversion is unacceptable given the potential availability of the Eden Walk site in Kingston town centre.

Therefore, the proposed development fails the sequential test, has harmful impact implications, and in accordance with the NPPF the application should be refused.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sara Whelan', with a stylized, cursive script.

Sara Whelan
Development, Planning and Regeneration Group Manager

Cc Colin Wilson, GLA