

THE NATIONAL RETAIL PLANNING FORUM

Chairman: Mr Chris Brearley CB, DL

James Denman
Department for Communities and Local Government
Eland House, Bressenden Place
London SW1E 5DU

Dear James,

Consultation comments on the Draft Statistics Plan for 2011-12

1. The National Retail Planning Forum (NRPF) is a cross-sector organisation. Its members include major retail firms, investment institutions and property development companies as well as the Local Government Association. It is not a lobbying body but aims to be a focus for improving understanding between private and public sectors of planning and its impact on retailing, which it does through a programme of research and collaborative events.
2. We welcome this opportunity to comment on the proposals for collecting and publishing official statistics. The NRPF has always believed it essential that there is a solid ongoing statistical base to inform retail and town centre planning and that this should be widely and freely available. Historically this has not been perceived to be case. The NRPF has been involved in initiatives to address this deficiency, including the development and promotion of the DCLG Town Centre Statistics.
3. The statistical base is needed at district and soon at neighbourhood level to formulate plans and policies by understanding existing capacity and development need. It is also needed at these and national levels to monitor the impact of plans and policies on the location, quantity and type of commercial and retail development. Whilst our focus is primarily on retail development, the statistics should show the proportion of new development within or close to town centres, in order to measure the effectiveness of policies to sustain town centres. The recent announcement by BIS of the Portas High Street Review highlights the need to maintain objective long-run data to monitor the health of town centres in order to avoid anecdotal impressions guiding policy.
4. To be of use, such statistics should be consistently defined to allow comparisons to be made between places and over time and to allow a national overview. Statistics will also need to be timely, with as short a

lead time as possible, and to be sufficiently spatially disaggregated. These requirements will be of increasing importance with the advent of neighbourhood plans.

5. Of most importance are floorspace statistics. The DCLG statistical products currently of relevance are the *Commercial and industrial floor space and rateable value statistics* and the *Extent of retail development taking place in town centres: England* statistics, both within the Planning Performance and Land Use Statistical Theme.
6. Both products are currently based on the same Valuation Office Agency (VOA) ratings data. Although this has some quirks in its classification, necessitating further analysis to produce the statistics, the VOA database is the most comprehensive source of floorspace data, although it may only be used for certain purposes.
7. Our response (jointly with BCSC and ACS) to the spring 2010 consultation on changes to those particular statistical products noted that they are consistent over space and time and so provide an overall check and useful historical series. However neither product is presently sufficiently timely or appropriately spatially disaggregated to be of much further use for policy monitoring or formulation. To be of more value they need to:
 - be published annually with a much shorter lead time (3-6 months);
 - indicate the location of development (town centre, edge-of-centre and out-of-centre locations);
 - be disaggregated to local authority and ideally neighbourhood
 - be disaggregated by size band of development (e.g. <100sqm, 100-249sqm, 250-499sqm, 500-999sqm, 1,000-1,999sqm, 2,000-2,999sqm, etc), with year-on-year change data to be available by size band; and, if possible
 - include not only retail but also offices and, perhaps, other town centre uses.

These improvements should be included in any specifications for replacement or outsourced products.

8. We cautiously welcome the proposal for the VOA to develop a replacement for the *Commercial and industrial floor space and rateable value statistics* as that organisation may be better able to perform these analyses cost-effectively and to reduce the lead time. It is important that VOA understand the use to which these statistics are put; they may also be able to amend the classifications in their underlying ratings database thus reducing the processing involved in producing the statistics. However

it is important that continuity is maintained and that any replacement is comparable with the existing DCLG statistics.

9. The *Extent of retail development taking place in town centres: England* statistics are of more use to retail planners and have greater potential if improved as suggested above. We are concerned that private sector replacements may not use the VOA database, rendering the new statistics less accurate and not comparable with the existing series. We are also concerned that any specification includes a public service dimension, ensuring that the statistics are freely available to any user, although there would be opportunities for the private sector to add value with more sophisticated products. This is in accord with the Government's Open Data agenda and will be of particular importance in formulating and monitoring neighbourhood plans.
10. The statistics would still have a long lead-time from permission through completion to recording, creating a long lag between decision and possible response. As we have previously proposed, a more timely measure of the impact of policies on commercial and retail development could easily be obtained by monitor planning permissions for major developments (i.e. those of 1,000sq m or more). This could be achieved through:
 - a small change to local authority quarterly returns on planning decisions (PS2) giving the use, floorspace and location (georeference); and
 - similar returns from the Planning Inspectorate for appeal and call-in cases;.

An annual analysis of this data would provide an 'early warning system' by monitoring whether new consents are in line with national policy.

11. We would very much welcome the opportunity to meet with the DCLG Statistics team to discuss these suggestions further. We are keen to assist with ensuring that future statistical products meet the needs of the retail planning community, and that the community is aware of those statistics and how they can best use them.

Yours sincerely,
Chris Brearley CB, DL
Chairman, NRPF,
27th May 2011