

PCC Division
Communities and Local Government
Zone 1/J1
Eland House
Bressenden Place
London SW1E 5DU

13th March 2008

Dear Sirs,

TOWN AND COUNTRY PLANNING (CONSULTATION)(ENGLAND) DIRECTION 2008

Operating at the heart of the retail property industry, BCSC works with its thriving membership that represent every aspect of retail property activity to provide a forum for networking; research; engagement with Government and developing partnerships.

BCSC welcomes the opportunity to comment on the Government's proposals to review and consolidate "call-in" directions for planning applications.

Our interest is primarily in the Departures Direction and the Shopping Direction as BCSC strongly supports the Government's "town centres first" policy in PPS6: Planning for Town Centres. We see these directions as part of the Government's reserve powers to be aware of and, where necessary, call in major retail developments which appear to be in conflict with this policy.

We welcome the proposal to consolidate these directions into one single direction and the opportunity this presents to make the purpose and process clearer, more transparent and, potentially, simpler.

Proposals: Do they help implement Government policy for town centres?

With regard to retail developments we generally welcome:

- the retention of the 5,000 square metre threshold
- the focus on **out-of-centre** developments; and
- the inclusion of major extensions in such locations which would take the size of developments over 5,000 square metres.

We do, however, have some concern that, whilst these proposals would work well for larger towns and cities, the 5,000 square metre threshold would exclude from notification many out-of-centre supermarket and retail warehouse developments between 2,500 and 5,000 square metres close to medium-sized and smaller town centres.

This territory is currently covered by the Shopping Direction which, although it needs streamlining and simplifying, acts as a safety net for medium-sized and smaller centres. The proposed withdrawal of this Direction, which we support, does however remove many major out-of-centre retail developments from scrutiny. The only safeguard under the

proposed arrangements is that controversial schemes for out-of-centre development, such as supermarkets, will still come to the Secretary of State's attention.

However, no information is presented about the number of retail cases that the Secretary of State would no longer have to be notified about. BCSC understands that in 2006/07 103 retail cases were notified to Government Offices and that 9 cases were called in.

Retail cases: considered and called in - 2003 to 2007

Year	Cases considered	Numbers called in
2003/04	91	13
2004/05	98	13
2005/06	93	15
2006/07	103	9

Whilst we appreciate that the proposed direction would result in fewer cases notified to the Secretary of State, which is welcomed, there is no assessment of the differential impact that the proposal could have on medium-sized and smaller centres. An analysis of call-in cases over the last 5 years would provide a better evidence base for considering the likely impact of these proposals on how Government policy is implemented there.

Draft Direction

With regard to the definitions in paragraph 5(1) of the Draft Direction, BCSC is concerned that the term "out of town development" should be "out-of-centre development" - to include edge-of-centre and out-of-centre locations in a definition of "out of town" is both inaccurate and confusing.

Overall, we welcome the consolidation of the Directions but with regard to retail development, BCSC considers that the proposals, whilst focussing on **out-of-centre** developments which are departures from the plan, have perhaps adopted too high a threshold to support a "town centres first" policy for medium-sized and smaller towns.

We look forward to reading the Government's response to this consultation. If you would like any further information regarding the position of BCSC's on call-in directions please do get in touch.

Yours sincerely,



Michael Green
Chief Executive