

28th January 2021

Public Service and Permitted Development Consultation
Ministry of Housing, Communities and Local Government
Planning Directorate
3rd Floor, North East, Fry Building
2 Marsham Street
London
SW1P 4DF

Dear Consultation Team

I am pleased to write on behalf of ACS (the Association of Convenience Stores) to inform your consultation on supporting housing delivery and public service infrastructure. ACS represents 33,500 local shops and petrol forecourts including Co-op, McColls, BP and thousands of independent retailers, many of which trade under brands such as Spar, Nisa and Costcutter.

We recognise the planning system has headline objectives to support high streets to adapt and support housing delivery, with the latter being the focus of this consultation. The streamlined planning route allowed by permitted development rights and the broader E Use Class removes barriers to retailers occupying the most suitable premises for their business, while the F2 Community Use Class recognises the value of isolated convenience stores for local areas. Permitted development rights also support a planning system which allows retailers to flex and change in-store offers, for example expanding food to go services. These rights can play an important role in helping high streets to adapt and meet demands for shop, office and residential property units.

Flexibility within the planning system will be important for the post-pandemic recovery as many businesses fundamentally evaluate their offers and trading locations. We support a positive approach to permitted development rights, but in relation to Q3.1, additional checks are required for retail to residential conversions. These changes of use should only be approved following proper consideration of: the potential impact on the economic health of the retail centre, the need to maintain an adequate provision of essential local services, and the potential impact on the local character of the area.

These three safeguards within the prior approval process would ensure conversions support effective retail provisions, especially in areas where property is generally worth more for residential than non-domestic uses. These safeguards are also required to avoid undermining the viability of shopping parades which host everyday services and infrastructure, which are integral to the idea of fifteen-minute neighbourhoods and have especially demonstrated their value throughout the pandemic. Retail to residential conversions are more appropriate as part of town centre development strategies and spaces above shops.

We are committed to working with you as part of this consultation and would welcome the opportunity to discuss in more detail. For more information, please contact steve.dowling@acs.org.uk.

Yours sincerely



James Lowman
Chief Executive