

24th March 2015

Clive Betts MP
Chair of the Communities and Local Government Committee
House of Commons
London SW1A 1AA

Dear Mr Betts,

We are writing in relation to the letter sent to you by Sir Bob Kerslake, Permanent Secretary, Department for Communities and Local Government, sent on 24 February 2015. The letter confirms that the Department no longer collects data on out-of-town or in-town retail developments following questions from Simon Danczuk MP to the Planning Minister Brandon Lewis and Permanent Secretary. The letter also provides a critique of ACS' (the Association of Convenience Stores) research '*Retail Planning Decisions Under the National Planning Policy Framework*.'

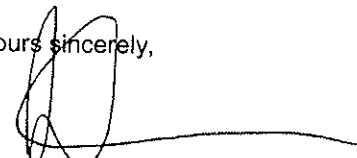
We believe that the criticism of our report is unjustified as the research is based on 50 case studies from 157 local authorities in England, excluding inner London. 157 local planning authorities represents half the total of 313 authorities in England. The 50 case studies amount to a sample of approximately 50% of all major retail planning applications in England which had been decided between the introduction of the NPPF in March 2012 and the publication of the report in November 2013. The Department for Business, Innovation and Skills recently also used a sample of 50 town centres to inform their research "*Policy implications of recent trends in the high-street/retail sector*", which we assume the Government considers to be a robust sample.

The letter highlights that '*minor retail developments were excluded entirely*'. This is because the research aimed to discover how local planning authorities applied the sequential and impact tests of the NPPF. The impact test and sequential test is only required if the development is over 2,500 sq m or a proportionate locally set threshold. Minor retail developments cannot therefore be included in the report as they do not determine whether the 'town centre first' test is being properly applied.

As set out in our evidence to the Communities and Local Government's Inquiry into the operation of the NPPF we believe the Government must do more to monitor retail and other town centre developments to see how effectively the NPPF is working. If the Government fails to do this they cannot understand whether this policy is being effective in driving new investment into town centres.

I hope that this clarifies the methodology used by Jonathan Baldock BSc (Est. Man.) MSc FRICS MRTPI to undertake our research. If you would like further clarity on our research methodology or have any further questions please contact the ACS public affairs team on 01252 515001.

Yours sincerely,


James Lowman
Chief Executive

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