

Greater London Authority
City Hall
The Queen's Walk
London

2nd March 2018

Dear Sirs

Dixons Carphone plc response to the Consultation for the Draft New London Plan

More recognition is needed that bulky goods and last mile distribution should receive a greater consideration and have a defined place in The Draft London Plan.

As one of the primary retailers in the greater London area where we employ over 10% (or 20% including HQ) of our workforce, we have been a key stakeholder and advisor in working with the BRC to assess the implications of the draft London Plan. Within the draft rightly there is focus on finding space to meet residential demand and on identifying any possible surplus commercial space.

However, this appears to assume future retail space is limited to where it is presently which may not effectively serve Londoners. In addition, because of the demand for residential space, land owners are likely to be incentivised to end commercial leases even if they are viable because they can profit more from residential developments.

As a retailer operating within predominantly bulky goods parks, we operate 181 stores (out of a total of 1000+) which along with other bulky goods retailers services the needs of the local and wider communities in providing access to at times essential and convenient products through convenient drive times, a wide bulky goods offering and a suite of services.

The draft London Plan in its current form raises a number of issues which we believe merit further debate:

- **There is a general lack of acknowledgement that Bulky Goods retailing has a place**
All retail is in the context of town centre development with subsequent policies to encourage cycling and walking to a retail destination. Existing out-of-centre and edge-of-centre retail and leisure parks are generalised in the report (section 2.8.3) as being 'low density and car dependent, poorly integrated into the surrounding area' and 'suffer from an environment that creates barriers to cycling and walking' – references that we strongly disagree with and statements which fail to acknowledge the convenience aspect of providing product services to the local catchment.
- **The principle concern is policy SD8 A4**
This effectively creates an overriding presumption in favour of redevelopment of out of centre retail locations to deliver housing intensification. There is no stated obligation to attempt to maintain the amenity or services provided by out of town retail when considering such a redevelopment as is the

case with convenience. At the very least, assessment of a local catchment and its bulky goods needs and servicing should be carefully analysed.

- **This concern is compounded by policy E4 C on logistics space**

Whilst this does have a degree of protection in that the existing provision is to be maintained (not increased), section E7 C actively encourages the achievement of this through intensification of land through co-locating logistics and other industrial and related functions within residential i.e. stacking of distribution sheds to release more land for housing. This is stated without any economic considerations to achieve this nor impact on the surrounding environment or residential communities.

- **Provision of last mile distribution**

The Plan fails to address the impact from a reduction of out of town retail centres on last mile distribution. A reduction in net retail space combined with a maintained level of logistics support will lead to significantly more demand for last mile distribution.

- **There is no assessment of Londoner's needs with respect to bulky goods provisioning**

90% of our customers use both stores and online channel on their customer journey. Bulky products such as washing machines, ovens, dishwashers and Large screen TV's often mean people have a need to come into store to seek specialist advice and see the product as well as choosing to take home the product themselves if the option is available. Under the draft London Plan intensification of out of town sites away from retail is likely to result in longer trips and a marginal increase in the cost of travel – as these trips can rarely be serviced by walking, cycling or even public transport given the size of the products involved.

The unintended consequence of all this is that either London customers will travel further to browse, showroom and select these products or if they are prepared to purchase online only, retailers will have to travel further and more frequently to service London customers.

What I would ask for is that whilst we appreciate that land use will need to be intensified to meet the needs of London, that existing Bulky goods retail provision is fully considered and protected wherever possible in redevelopment proposals. This would mean landowners would be forced into more considered redevelopments that encourage a mixed use scheme rather than a simple replacement with housing.

Yours faithfully

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