

**London Borough of Ealing
Development (or Core) Strategy
Submission Development Plan Document – Independent
Examination**

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**Mr Guest queries - Retail
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‘The soundness of the retail growth projections that underpin the Council’s retail strategy and which relate to the Inspector’s question: “Is the proposed retail hierarchy soundly based, fully justified and consistent with national policy?”

The Council’s response ED 90 / LPA 11 does not address the concerns over the soundness of the retail analyses and projections raised in my submission ED 25 and its appendices.

Two particular concerns are:

The use of unrealistically high growth rates for retail expenditure, Retail Trends published by GVA in Spring 2011 (appendix to ED 25) states that Experian had downgraded its growth projections to 2.5%pa for the period 2011-16 (bottom left hand corner of page 4). This compares to 3.6% used in the Council’s projections for the same period (see EB 28, Joint Retail Needs Study Update, page 15, paragraph 3.14, table 3.5). It is likely that Experian have further reduced their projected growth rates in the light of recent economic news.

It is worth pointing out that paragraph 1.21 the Update report (EB 28, volume 1) states: “The main survey work and quantitative analysis was undertaken in November and December 2009.” This is now nearly two years ago.

*The use of an unrepresentative population sample
The market research sample used to apportion the consumption expenditure of residents to different shopping centres does not represent the age and gender profile of the local population as reported by the census. This concern is set out on pages 35 to 37 and in the table on page 43 of the Arcadia Inquiry – Retail Proof appendix to ED 25. While this appendix is based on the same market research agency’s earlier work for the West London Retail Needs Survey (EB 27), the same sampling errors have been repeated with similar error results in the Joint West London Retail Needs Survey Update (EB 28). Please see EB 28 pages 391 and 392 of EB 28, volume 3*

I'm not sure what will be the most productive way of dealing with these concerns. I suspect that the Inspector might wish to avoid a detailed technical discussion at the main examination hearings as that could become somewhat 'anorak'. At the same time we probably need to examine the soundness of the evidence upon which the Council's retail aspirations are based. I recall a couple of round table discussions during the examination of the London Plan and wonder if something similar might work?

You will have also noted that the latest Town Centre Vacancies statistics on page 101 of the Annual Monitoring Report (EB 12) are over two years old and date from the spring and summer of 2009. So it would probably help if we could have a look at the Retail and related issues in the light of up-to-date available information.'