

Date: 23rd January 2018

Representations by HHGL Ltd to the Epping Forest Draft Local Plan (December 2017)

These representations relate to the Homebase site at 140 Church Hill in Loughton.

The representations are submitted on behalf of HHGL Ltd, which trades as Bunnings and Homebase in the UK & Ireland.

The draft Local Plan does not contain any specific policy or designation in relation to the Homebase site. We have set out below the reasons why this omission should be addressed before the Plan is adopted.

Background to Submission

Bunnings is the leading home improvement and outdoor retailer in Australia and New Zealand.

The home improvement and garden market sector within the UK & Ireland is growing, but it is also fragmented and underserved. Bunnings' aim is to re-invigorate this market and introduce the Bunnings brand, which has been built on the three strategic pillars of lowest prices, widest range and best service.

Bunnings acquired Homebase as a platform to build the Bunnings brand within the UK & Ireland and have allocated £500 million to launch this over the next 3-5 years.

Bunnings' investment has already commenced with the first Bunnings Warehouse store in St Albans Griffiths Way opening in February 2017. Since then, a further 14 Bunnings Warehouse stores have opened in St Albans Hatfield Rd, Hemel Hempstead, Milton Keynes, Folkestone, Broadstairs, Basildon, Sittingbourne, Thanet, Worle (Weston Super Mare), Harlow, Rochdale, Rotherham, Bicester and Walthamstow (London).

Bunnings employ 12,000 team members within the UK & Ireland, including over 1,500 team members in London. These numbers are expected to grow significantly as Bunnings converts existing Homebase stores and invests in new site opportunities.

Bunnings' are a fair and community-focused employer, paying the National Living Wage for all team members aged 18+. Many of its stores inside the M25 have starting pay rates at a higher level than the national living wage, recognising their proximity to London.

Bunnings are highly active in the communities they inhabit, with a track record of local activity of more than 25 years, details of which can be found at <https://www.bunnings.com.au/about-us/in-the-community>. In Australia and New Zealand, Bunnings has helped raise more than A\$37 million for local community groups.

Bunnings is keen to replicate this community commitment in the UK & Ireland and this has already been demonstrated with its most recent store openings. Between February and June 2017, the four Bunnings Warehouse stores opened helped raise more than £30,500 for local charities and participated in and supported over 35 community activities.

Included with this submission is a copy of the Bunnings UK & Ireland Property Guide November 2017, which provides further background to the business and its store strategy moving forward. Also included is a copy of

Bunnings Community & Sustainability Guide November 2017, which provides further background to the businesses' community initiatives and sustainability policies

Homebase in Church Hill, Loughton

Bunnings remain fully committed to the Loughton Homebase store. The store is held on a secure lease, with over 9 years of tenure remaining.

Bunnings will be looking to include this store within its future investment programme and brand launch. Those Homebase stores already converted to the Bunnings brand have seen, on average, a 50% increase in staff numbers.

The Draft Plan's approach to Loughton, which includes the Homebase site, is dealt with in Section 5, paragraphs 5.24 – 5.40 (inclusive) and Policy P2. These contain no mention of the Homebase site, even though it is an established retail use and destination. The Homebase Loughton store forms an important part of the comparison offer of Loughton and provides for a significant number of local jobs, both directly and indirectly.

This is, in our view, an omission of the Draft Plan. Our clients would request, therefore, that this be addressed through amending Policy P2 by the introduction of a further sub-clause after 'H – Small District Centres' to refer to the designation of the Homebase site as a 'Retail Warehouse Area'. This designation would reflect the important contribution that Homebase makes to the comparison offer of Loughton, as well as its importance as a source of a large number of local jobs and the contribution its makes to sustainability objectives and local community initiatives - values that will be enhanced through the planned investment and conversion to Bunnings.

This 'Retail Warehouse Area' designation would be consistent with that found in other adopted Local Plans (examples of which can be provided if required). It would be recognition, as in those cases, that certain retail warehouse uses, such as Homebase, are not appropriate for town centres and that Local Plan policies should, therefore, seek to direct and/or retain those uses within designated 'Retail Warehouse Areas'.

As in the case of Homebase, this 'Retail Warehouse Area' designation would identify those areas of the Borough that are established and recognised destinations for retail warehouses and make provision for their continued use for that purpose.

The designation of Homebase as a 'Retail Warehouse Area' is justified by the important retail and employment role that the store performs, but it would also reflect and acknowledge the lack of alternative sites for this form of large format retail use within Loughton.