



Mr Jameson Bridgwater  
C/o Ms Linda Amos  
Worthing Borough Council CIL Examination Programme  
Officer,  
Worthing Borough Council,  
Portland House,  
44 Richmond Road,  
Worthing,  
BN11 1HS

Our Ref: 62260939

14 January 2021

Dear Mr Bridgwater,

### **Worthing Borough Council Community Infrastructure Levy Revised Draft Charging Schedule Examination**

On behalf of St Clair Developments Ltd, we submit these representations in advance of Worthing Borough Council Community Infrastructure Levy (CIL) Examination Hearing on 28 January 2021. St Clair Developments is the owner of 19-23 South Street, Worthing, a key town centre site which until recently was occupied by Beales department store. Beales went into administration in January 2020 and was subsequently forced to close in mid-March due to the COVID-19 pandemic.

St Clair submitted representations to the Draft Charging Schedule Consultation in August 2020, which in part detailed the struggles the retail market is facing, which have been further compounded by the COVID-19 pandemic. These representations provide an update on the impact that COVID-19 is having on town centres and the economy across the nation and specifically within Worthing. These representations also underline the importance of Worthing Borough Council introducing CIL relief in exceptional circumstances, to enable key developments to come forward where they may otherwise be rendered unviable, especially in this harsh economic climate.

### **THE IMPACT OF COVID-19 ON THE RETAIL MARKET**

St Clair's representations to the Draft Charging Schedule Consultation (dated 25 August 2020) outlined the significant changes the retail market has been facing in recent years as a result of the rise of Internet shopping. At the time of writing the previous representations, COVID-19 was already having a seriously detrimental impact on British high streets, with lockdown restrictions forcing businesses to close and causing many to go into administration. England has continued to be subject to national or local lockdown restrictions for the majority of time since August 2020, which has deepened the economic impact of the pandemic.

Several major retailers have gone into administration since August 2020, including Arcadia – the owner of Topshop/Topman, Burton, Dorothy Perkins and Wallis, all of which have stores within Worthing town centre. In addition, Debenhams has gone into administration after 240 years in business. The Debenhams store in Worthing has a very prominent location within the town centre, located opposite the former Beales department store on South Street. Furthermore, Edinburgh



Woollen Mill and Peacocks have also gone into administration, both of which have stores in Worthing town centre.

The severity of the impact of national lockdowns on high streets is clear when considering the footfall across the nation. The British Retail Consortium (BRC) published an article<sup>1</sup> indicating that high street footfall was 77.8% lower in May 2020 compared to May 2019. Similarly, a BRC article reporting on the November national lockdown<sup>2</sup> indicated that footfall on UK high streets was 63.9% lower in November 2020 than November 2019.

British high streets were already under serious pressure prior to the COVID-19 pandemic, though lockdown restrictions have further increased consumers' reliance on online shopping. The pandemic has significantly accelerated the pace of change in town centres, highlighting the fragility of the businesses which occupy them.

St Clair has been doing all it can to ensure the former Beales site is not left vacant, including providing tenants with rent-free periods and contributing towards the fit-out costs to make it suitable for its new occupier 15-17 (a department store which focuses on independent traders). However, the Council must also take a proactive and positive approach to encouraging development within town centres to prevent former retail units for which there is no longer demand from becoming long-term vacant. The planning system should encourage a range of uses in town centres, including residential, to improve their vitality and viability, and minimise financial obligations (including the payment of CIL charges) which may render such schemes unviable.

In the current economic climate, any CIL charge in town centres may render development unviable and this must be taken into consideration when adopting a new CIL charging schedule.

#### DISCRETIONARY CIL RELIEF

St Clair's representations to the Draft Charging Schedule Consultation (dated 25 August 2020) outlined how important the introduction of CIL relief in exceptional circumstances is for Worthing Borough Council, especially given the current economic climate and the financial difficulties that many businesses are facing. We would welcome the opportunity to discuss this matter further at the upcoming Examination Hearing, however we note that it is not included in the Inspector's Matters, Issues and Questions for the Examination. We therefore request that the adoption of a discretionary CIL relief policy is added to the Hearing programme (possibly in the 'Part Four – Other Matters' discussion).

Yours sincerely

Mathew Mainwaring  
Director

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<sup>1</sup> <https://brc.org.uk/news/corporate-affairs/will-footfall-return-to-uk-streets/>

<sup>2</sup> <https://brc.org.uk/news/corporate-affairs/uk-footfall-declines-steeply-with-second-lockdown/>