



Quod

Rebuttal Proof of Evidence of Barney Stringer

Alpha House
Regis Road
Camden NW5 3EW

May 2024

Quod ref: Q220514

Appeal ref: APP/X5210/W/24/3337347

Rebuttal proof of evidence

- 1.1 This rebuttal proof responds to Kristina Smith's proof of evidence only insofar as I consider a specific written response would assist the inquiry. In particular I wish to correct a misunderstanding evident in Ms Smith's proof. I have not responded in this rebuttal proof to every point in Ms Smith's proof, however this should not be taken as an indication that I agree with other parts of her evidence.
- 1.2 I confirm that the evidence in this Rebuttal Proof of Evidence is true and the views expressed are my true and professional opinions.
- 1.3 In paragraph 4.3 of her proof Ms Smith comments on the employment projections based on survey evidence of businesses occupying space in Big Yellow stores. She says "only 40% of space in BY's London locations is used by businesses, so this percentage should be applied to employment generation". She then suggests scaling down the likely employment benefit accordingly.
- 1.4 This is, however, a misunderstanding of the evidence from the survey. The job density figure of 28sqm Gross Internal Area per job already takes account of non-business space (including space let to residential customers and non-net space such as circulation). It is not an employment density for the business space within Big Yellow, but an average across all internal space in the typical Big Yellow store.
- 1.5 This is explained in the Economic Statement submitted with the application (CD-1.16), Appendix B, paragraph 4.10, which states "it works out on average as one job for every 28 square metres Gross Internal Area across the whole store."
- 1.6 Note that at the time of the survey, only 28% of space in Big Yellow nationally was let to businesses. If the new store reflects the 40% business lettings now seen in London, then the job density would in fact be significantly higher. This is explained in paragraphs 7.15 to 7.17 of my proof.
- 1.7 On that basis, it would be incorrect to discount the employment numbers as Ms Smith suggests, and the figures given in my proof remain the correct application of the survey evidence.