

London Assembly Planning and Housing Committee
London's Small Shops and the Planning System Investigation
Combined Evidence Received

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SSLC001-Royal Borough of Kensington and Chelsea

Response to the GLA Review of Measures Designed to Support London's Local and Neighbourhood Shops from the Royal Borough of Kensington and Chelsea

1. What pressures do small shops and neighbourhood and local shopping centres face e.g. threats to economic viability, changes in shopping patterns, competition?

- Shopping patterns have changed drastically since the sixties, now the majority of women work and consequently most food shopping takes place at the weekends or after the working day. The combination of the convenience, of being able to meet all shopping requirements under one roof, offered by supermarkets together with the fact that small shops have found it difficult to match the quality, value, marketing and extended opening times of supermarkets means that there has been a drastic reduction in the number of specialist butchers, bakers, fishmongers and greengrocers. In contrast cafes and coffee shops and, to a lesser extent, delicatessens and wine merchants have expanded as leisure shopping has increased.
- There has been a tendency for retail to concentrate in higher order centres and out-of-town locations, at the expense of smaller and local centres, despite attempts to protect smaller centres and local shopping on sustainability grounds.
- In comparison to other types of small businesses small shops suffer disproportionately from the NNDR because shops generally have much higher rates than other business properties, this threatens the economic viability of smaller shops where the rates can easily be the equivalent of the cost of a member of staff. This problem is more pronounced in London because property prices are higher.
- The expansion of restaurants, cafes and coffee shops, often run by chains, that can afford to pay higher rents is putting small shops under pressure to convert to these higher value uses which require considerably less investment stock. Similarly isolated small shops, small parades and neighbourhood centres can come under pressure to convert to residential uses. Whilst there are planning powers to prevent these changes, once a property has been vacant for some time its viability as a shop becomes questionable and it can be increasingly difficult to refuse change of use.

2. What are the advantages of local centres that provide convenient access to goods and services that are needed on a day-to-day basis?

- Fundamentally this is an issue of sustainability - reducing the need to travel. There are other, more nebulous benefits, in terms of supporting a sense of community and providing the opportunity to meet people. Local centres need to provide for both shopping needs and neighbourhood facilities, such as doctors etc. A successful centre is one where there is a balance between shops and social and community uses because these uses draw people in to centre and help to support the shops.

3. How effective the planning system is in supporting small shops in local high streets and where has it failed in recent years?

- The planning system provides no powers to protect small shops in local high streets or anywhere else. RBKC's Retail Commission identified two particular changes to the planning system that would help to protect small shops:
 - o change the Use Classes Order to create a new use class for small shops (less than 80m²) so planning permission would be required to amalgamate small units into larger ones, but not to divide a large units into smaller ones; and

- o change the Use Classes Order to create a new class for coffee shops and internet cafes. Currently there is an anomaly in that coffee shops and internet cafes where most of sales are taken away are defined as A1 shops and consequently planning permission for change of use from a shop to such a coffee shop is not required, although permission would be required for change to a restaurant or a cafe.

4. What are London local authorities doing to support small shops and neighbourhood and local shopping centres through the planning system, Development Plan Documents, or proposals under the Sustainable Communities Act?

- Acting on one of the main recommendations from the Retail Commission the borough has appointed both a Retail Champion (Town Centre Initiatives Manager) and a Markets Champion (Markets Development Manager) to develop, respectively, the borough's retail offer and markets.

- RBKC's Proposed Submission Core Strategy includes a series of policies under the heading 'Keeping Life Local' that are designed to enhance neighbourhood centres and ensure that all residents can meet their day-to-day needs locally. In addition the Proposed Submission Core Strategy 'Places' section examines what makes each of our major town centres unique, identifies a vision of how the centre should develop up to 2028 and a set of policies and actions that will help to deliver this vision. In addition the Town Centre Initiatives Manager is building upon the consultation work undertaken for the Core Strategy and working with retailers to develop Action Plans for each of the borough's main town centres. The provision of small shops is an important part of the vision for our centres since they can be a significant point of differentiation between centres that, particularly across London, have to compete with many other centres nearby and further afield.

- RBKC has recently announced that it will be launching the Wedge loyalty card for independent retailers borough-wide in March 2010. 86,000 households in the borough will be sent a free Wedge card (normal cost £10) and all employees working in the borough will also be eligible for a free card. The Borough sees this as a concrete step that will support small retailers, and participating retailers will also gain from having their businesses featured on the Wedge website and access to the Wedge team's expertise in marketing small shops.

5. What, if any, progress has been made in relation to planning and related areas following the recommendations made by a number of bodies over the past years? (e.g. Parliamentary Small Shops Group in 2005, New Economics Foundation -Clone Town Britain, Competition Commission Inquiry into the UK Groceries Market, 2008)

- We are not aware that any progress has been made and, despite lobbying from 2007 to 2009, CLG has declined to implement the changes that were recommended in RBKC's Retail Commission Report – A Balance of Trade.

6. How can the Mayor's commitment to help protect the high street best be implemented through London Plan and other policies?

- Support London-wide introduction of the Wedge loyalty card for independent retailers. As detailed above RBKC have recently decided to support the Wedge Card by giving free cards (normal costs £10) to all residents and employees in the borough for one year.

- As part of the wider duty for Unitary Local Authorities to assess the need for economic development, ensure that GLA guidance includes a specific reference to assessing the need for development and support for the retail sector.
- Support the use of s106 agreements to provide 'affordable' retail units to be managed by councils. This policy has been written in to RBKC's Proposed Submission Core Strategy.
- Support diversity within London's Town centres in terms of their function, type of retail and unit sizes.

7. What outstanding actions and opportunities are in order to support and to help small independent retailers in London and facilitate ongoing support?

- Support the recommendations of the RBKC Retail Commission:
 - o change the Use Classes Order to create a new use class for small shops (less than 80m²) so planning permission would be required to amalgamate small units into larger ones, but not to divide a large units into smaller ones; and
 - o change the Use Classes Order to create a new class for coffee shops and internet cafes. Currently there is an anomaly in that coffee shops and internet cafes where most of sales are taken away are defined as A1 shops and consequently planning permission for change of use from a shop to such a coffee shop is not required, although permission would be required for change to a restaurant or a cafe. RBKC is writing to London Boroughs to ask for their support to put forward a new London Local Authorities Bill to grant these powers to London Boroughs.
- Resist the Killian Pretty review recommendations that shop front alterations should be subject to prior approval (except in Conservation Areas) as this will inevitably lead to deterioration in the quality of shop fronts.
- Support provision of a new facility for local authorities to be able to create an exemption from standard VOA rating practice for small retailers who contribute to the unique attraction of a particular area. In the case of RBKC the Council would like to be able to support the antique arcades in Portobello Road in this way. These antiques arcades suffer a particular disadvantage because they generally only trade on Saturdays but they are rated as other shops in the street that can trade all week. This means that the owners are under considerable pressure to convert antiques arcades into normal shops, and the area risks losing one of its unique attractions.
- Implementing the recommendations of the Hampton Review (encouraging greater synergy between planning authorities, Town Centre Managers, community workers, market officials and national departments and agencies). RBKC have found considerable benefits in having the Town Centre Initiatives Manager and the Retail Planner working very closely together within the Planning Policy section. This arrangement has improved retailer engagement in the Core Strategy consultation process and day-to-day brings a balanced view of retail matters to planning policy decisions.
- Retain the needs test in PPS6, this has worked effectively and adds clarity to the process. Although need is integral to the thorough impact assessment the government is proposing, removal of the needs test will cause confusion and is a retrograde step. However, because this borough is heavily built up and residential land prices are very high, RBKC does not have a problem with large out-of-town supermarkets.

Cllr. Tim Ahern
Cabinet Member for Service Improvement and Regeneration
Royal Borough of Kensington and Chelsea

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Dear Jenny

Measures Designed to Support London's Local and Small Shops

Further to the meeting that was held on 10th November, and the information we subsequently supplied on business rates in Portobello Road, we have been in contact with the Westminster VOA and gleaned some more information on how shops and superstores are valued for business rates.

Valuations are based on known shop rents for each street, and rents are reviewed for individual stretches of a road because they can vary significantly along a street. Assessments for individual shops are based on dividing the net internal area (excluding service accommodation like toilets and associated lobbies) into 6.1 metre zones. The front part, nearest the window, is zone A and has the highest valuation; the next zone B is lower; and the zones continue until the entire depth of the retail area is allocated to a zone. This assessment method assumes that the most valuable part of the shop is the window and will result in higher valuations for corner shops that have windows on two sides and lower valuations for deep, narrow units.

Unlike shops, superstores are assessed on gross internal area (the whole enclosed area of the building). Superstores are assessed on known rents for other comparably sized and located superstores throughout the London boroughs. This region-wide approach to valuation is taken because there is less rental evidence for superstores as many are held freehold.

That said, the specific example we looked into in Portobello Road shows the business rates for the Tesco store have increased substantially in the 2010 revaluation to £323,833, compared to £133,000 in the 2005 valuation.

It is difficult to make comparisons between the valuations for superstores and other shops, given that the assessments are based on gross internal area (superstores) and net internal area (shops), and the overall size of the superstores is vastly different to small shops. In assessing the rateable value for business rates, it is assumed that the shop, whether a superstore or a small shop, is vacant and to let. It is fair to say that there would be many more tenants for a small shop than a store the size of Tesco. They are in effect two separate markets.

However, the limited investigation we undertook shows that small shops in Portobello Road have rateable values per square metre in the range £324 - £955, antiques arcades £499-£795, the one large store £159 and Tesco £170. This suggests that the valuation for Tesco is in line with the only other comparably sized stores in the street (despite the different assessment method).

From our perspective the current superstore assessment system may be appropriate for out of town superstores but now that supermarkets are concentrating on expanding in town centres a more transparent, comparable system is required. Similarly, a system that puts a premium on shop windows looks outdated when shops have to compete with supermarkets that are designed to maximise sales per square metre across the entire shop floor.

I hope this will help you to take the debate forward.

Yours sincerely

Councillor Tim Ahern
Cabinet Member for Service Improvement and Regeneration

SSLC002-City of London

London Assembly: Review of Measures Designed to Support London's Local and Neighbourhood Shops

This is an officer response based on experience in the City of London: The comments reflect the City's location within London's Central Activities Zone and do not address the wider issue of local and neighbourhood shopping parades in suburban locations.

Use Classes Order

1. The Use Classes Order can be used to provide some control over the mix of land uses in a town centre or local shopping parade and also the mix of retail uses (A1-A5). This is normally achieved through the application of development plan policies designed to protect the vibrancy and vitality of shopping centres. However other material considerations are also relevant and a common argument presented to justify change of an existing shop unit is that it has been vacant for a long time and is no longer viable as a shop.
2. The Use Classes Order does not distinguish between the many types of A1 shop units and takes no account of their ownership or leasing arrangements. It cannot control the mix of A1 shop units or the balance between independent shops and chain stores. The general public often assume planners have the power to control the precise mix of shop units and to protect the interesting independent shops that make particular shopping streets unique. However these matters cannot be controlled through planning powers.

Size of Units

3. Planning policies can be used to control changes to the size of existing shop units and the mix of unit sizes in new developments. This can have an indirect effect on the mix of independent and multiple stores as there is a tendency for independent shopkeepers to occupy smaller units and for multiple chains to occupy larger units. Heritage policies for conservation areas and listed buildings can also have a similar indirect effect as they tend to protect existing small units that are more likely to be occupied by independent shopkeepers.
4. Within the City there has been active policy encouragement for more retail floorspace in principal shopping centres in order to attract major stores and strengthen the centres as retail destinations for City workers, visitors and residents. This has particularly been the case in Cheapside, where partnership working through the Cheapside Initiative is leading to extensive retail expansion and environmental enhancement to restore Cheapside as the City's 'High Street'.
5. Bow Lane conservation area, off Cheapside, provides a different shopping experience of smaller retail units and a greater mix of independent traders. Heritage policies reinforce its existing character of smaller units that is more attractive to independents. However, even here, some of the small units are operated by multiples that are better able to afford the high rents that this successful retail area can command.

Ownership and Long Term Letting Strategy

6. Achieving a desirable mix of retail units needs a successful combination of planning and letting policies. Planning policies can set the broad context but it is land owners who determine the precise mix of units through their letting policies. Fragmented ownership patterns and a reliance on short term financial gains can lead to most shopping streets being dominated by the same multiples because agents on individual sites let to multiples that are best able to pay the high rents demanded.

7. An alternative approach is possible where land ownership is consolidated and the owner can pursue a letting strategy that benefits the area as a whole in the long term, and that also provides greater scope for independent traders. This strategy normally involves providing a short-term subsidy to the independent traders that help make a shopping street unique, interesting, and attractive. Once the street has become established as a retail and leisure destination then capital values will rise to the benefit of the estate as a whole. A classic example of this approach in central London is at Marylebone High Street.

8. Many local authorities are also significant landowners in their town centres and therefore there is scope for them to use both their planning and their ownership powers, taking a long term approach to enhancing the vibrancy and vitality of their town centres and local shopping parades. For example, the City Corporation uses its ownership of Leadenhall Market to encourage weekly market stalls in the streets of the Market to enhance the character of this conservation area and principal shopping centre.

City of London Corporation.

SSLC003-London Borough of Camden

Dear Alexandra

Camden response to the London Assembly Consultation on London's small, local and neighbourhood shops

Please find enclosed Camden's response to your questions regarding London's local and neighbourhood shops and small independent shops.

Small, local and neighbourhood shops contribute greatly to Camden's diversity and character, and local quality of life. This point has been emphasised by many residents during recent consultations on our local development framework. We are therefore pleased to be given the opportunity to contribute to the London Assembly Planning and Housing Committee's work.

Manager, Planning Policy and Information

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Review of Measures Designed to Support London's Local and Neighbourhood Shops

Camden Response

The table below sets out detailed answers to questions raised by the GLA. Small and independent shops and local centres face considerable challenges, including as a result of changes to shopping trends. In Camden (especially the Central London area), some small and local shops are also subject to pressure for redevelopment for other uses. However, small shops and neighbourhood/ local centres are extremely important to local quality of life and character and diversity in Camden, a fact that has frequently been emphasised during public consultations on the Camden LDF.

Camden is now taking a more proactive stance to the promotion of small and independent shops, supported by emerging national (draft PPS4) and London Plan policy. However, more is needed, in particular lobbying for change in the Use Class Order to separate small shops from larger shops in order to enable planning authorities to control the loss of small shops. The Mayor could also consider investigating opportunities to establish dedicated area-based funding for boroughs to invest in local environment improvements in neighbourhood and local centres.

Question	Camden Response
1. What pressures do small shops and neighbourhood and local shopping centres face e.g. threats to economic viability, changes in shopping patterns, competition? <i>(What evidence is there to show that they may be under threat and what are the main threats faced by small, local and independent retailers?)</i>	<p>One of the key threats to the number of small shops available in Camden is their loss through the amalgamation of two or more small units to make larger premises. Of course, under the current planning system planning authorities are often unable to prevent this as it is often not constituted as development. The loss of small shop units is of particular concern in parts of Camden that are characterised by smaller shops, for example in Camden Town. This concern has frequently been raised by residents during public consultation on the Camden LDF. There is a very real risk that the attractiveness of particular areas that are characterised by smaller, independent shop units could be lost as a result of demand for larger units in such locations, and the inability of the Council to prevent such losses on many occasions.</p> <p>We have found that neighbourhood and local shopping centres in</p>

	<p>the central London area of Camden are at times subject to significant pressure for change of use/ redevelopment due to high land values. However, this is an area where we can often have more control, and we have planning policies in place in order to avoid the significant loss of retail in our centres (Camden UDP Policy R7 and draft Development Policy DP10).</p> <p>Rents from commercial landlords and other charges placed on local businesses (for example business rates) are an issue for small and neighbourhood/ local shops. In recent consultations on the Camden local development framework members of the public and business owners have raised concerns over the impact of rents and other charges on the viability of their businesses.</p> <p>As anywhere, small shops and shops in local/ neighbourhood centres in Camden are also under threat from wider shopping trends, in particular relating to the growth of supermarkets and online shopping.</p>
<p>2. What are the advantages of local centres that provide convenient access to goods and services that are needed on a day-to-day basis? <i>(What are the benefits of small, local and independent retailers to London? (In what locations do we define these types of shops?))</i></p>	<p>Neighbourhood/ local centres and small and independent shops provide many benefits in Camden, a borough that has a vibrant economy and a diverse population:</p> <ul style="list-style-type: none"> • they enhance accessibility to local shops and services for everyone, including those who have mobility difficulties, and those who do not have access to a car • they provide a focal point for community activity and interaction • they make a significant contribution to the character and diversity of the Borough, enhancing its cosmopolitan and vibrant nature and enhancing consumer choice; • local centres and the small, independent shops that are most likely to trade in them provide individuality and character, in contrast to the many "clone" towns that exist today • local and small and independent shops are more likely to be owned and run locally with knock on economic benefits for the area (e.g. spending stays local) • local, independent and specialist shopping areas also provide for minority and ethnic communities, for example Drummond Street's ethnic Asian shops and restaurants <p>During recent consultations on the Camden local development framework, residents gave a strong message regarding the importance of local and neighbourhood centres and small and independent shops to the character of the borough and to local quality of life.</p> <p>At a more strategic level, Camden's District Centres and specialist shopping areas form an important part of the Camden economy and employment. Some centres contribute to the tourist economy, for example Camden Town District Centre (an international shopping destination) and Hatton Garden specialist shopping area (internationally renowned for its jewellery).</p>

<p>3. How effective the planning system is in supporting small shops in local high street and where has it has failed in recent years</p>	<p>The planning system enables local authorities control the loss of retail to other land uses, and Camden has effectively managed the level of retail in its centres using Unitary Development Policies and supplementary guidance, which sets out the proportion of retail uses that Camden will seek to retain in particular centres.</p> <p>However, the planning system is currently ineffective in preventing the amalgamation of small shops into larger premises, as this is often beyond the control of planning authorities. As indicated above (in relation to question 1), this is of some concern in particular areas that are characterised by small shop units, but where there is demand for the amalgamation of units. Until the Use Class Order is amended in order to differentiate between small and large shops, this problem will continue.</p> <p>Until recently, national and London Plan policies have not given local planning authorities sufficient backing to seek the provision of small units as part of new developments. However, it would appear that this situation is changing: the consultation draft PPS4 Policies EC6 and EC24 appear to provide stronger support for such measures. We also note that draft London Plan Policy 4.9 provides strong support for the promotion of small shops in new development, and this should help to support a more proactive approach by local planning authorities in the future. Camden's proposed submission Development Policies document (Policy DP10) sets out how we will seek the provision of smaller units as part of large developments.</p> <p>It also should be recognised that, whilst the planning system can be a part of the solution to the issues facing local, small and independent shops, it cannot provide the whole solution. For example, planning generally cannot be used to control the type of occupier in any given premises (so chain stores could still trade from small premises), and planning cannot control rent levels, which can have such a significant impact on the viability of independent and small businesses. Kensington and Chelsea's Retail Commission report on small shops sets out a wide range of recommendations to address the issues facing small and local shops.</p>
<p>4. What are London local authorities doing to support small shops and neighbourhood and local shopping centres through the planning system, Development Plan Documents, or proposals under the Sustainable Communities Act? <i>(What policies have been proposed to support small, local and independent retailers and what progress has been made in implementing them?)</i></p>	<p>As stated above (in relation to question 3), Camden has effectively managed the level of retail in its centres using the Unitary Development Plan and supplementary guidance, which sets out the proportion of retail uses that Camden will seek to retain in particular centres. This has been successfully used to protect the essential retail function of Camden's centres.</p> <p>New policies in the Camden local development framework will enable the Council to take a stronger and more proactive approach to protecting and promoting small and independent shops. The proposed submission Camden Core Strategy specifically states that we will protect and promote small and independent shops, and resist the loss of shops where it would cause harm to the character and function of a centre. The <i>Centre specific planning objectives</i> set</p>

	<p>out under Policy CS7 state that we will seek to retain a strong element of convenience shopping for local residents in Camden's neighbourhood centres, and will resist schemes that would result in less than half of ground floor uses being in retail use, or in more than three consecutive premises being in non-retail use (see p76 of the proposed submission Core Strategy)</p> <p>Policy DP10 of the proposed submission Development Policies document expects large retail developments to include a proportion of smaller units, and encourages the occupation of shops by independent businesses and the provision of affordable premises.</p> <p>As indicated in response to question 3 above, this stronger, more proactive approach is supported by emerging national policy in the form of the consultation draft PPS4 and the draft London Plan.</p>
<p>5. What, if any, progress has been made in relation to planning and related areas following the recommendations made by a number of bodies over the past years? (e.g. Parliamentary Small Shops Group in 2005, New Economics Foundation -Clone Town Britain, Competition Commission Inquiry into the UK Groceries Market, 2008)</p>	<p>As indicated in relation to questions 3 and 4 above, draft National and London Plan policy encourages local authorities to establish a more proactive approach (within existing planning powers) to protecting small and local shops. This represents the main progress on the issue in recent years.</p> <p>However, the proposed removal of needs test (as set out in the proposed changes to PPS6) could cause harm to small and local shops by removing a key mechanism to control the proliferation of supermarkets. In its response to communities and Local government on the proposed changes to PPS6, Camden highlighted the need for the strengthened impact test to be sufficiently robust to ensure the continued viability of small and local shops.</p> <p>As stated in relation to question 3, planning cannot provide the whole solution to many of the issues raised in these reports. For example, planning generally cannot be used to control the type of occupier in any given premises (so chain stores could still trade from small premises), and planning cannot control rent levels, which can have such a significant impact on the viability of independent and small businesses.</p>
<p>6. How can the Mayor's commitment to help protect the high street best be implemented through London Plan and other policies? <i>(What can the Mayor do through the planning system to support small, local and independent retailers?)</i></p>	<p>Policy support for the protection of existing small and independent shops. As indicated above in relation to question 3, we welcome draft London Plan Policy 4.9, which supports the promotion of small and affordable shop units in new development, and therefore provides a strong policy platform for local authorities to take a more proactive approach.</p> <p>At a more strategic level, the London Plan could help to protect the viability and vitality of town centres and the future of small and local shops by resisting further out of centre development. Out of centre development in London has direct and indirect impacts on neighbouring boroughs in terms of traffic generation, and of course impact on the vitality and viability of other centres. We note that draft Policy 4.7 refers to the need for an impact test for out of centre development, and states that LDFs should firmly resist inappropriate out of centre development. However, due to these cross-borough impacts, we consider that the London Plan could</p>

	take a clearer and stronger line by ruling out any future major out of centre development in London.
7. What outstanding actions and opportunities are in order to support and to help small independent retailers in London and facilitate ongoing support?	<p>As indicated in relation to questions 3 and 5, wider issues that go beyond the scope of planning need to be addressed, including rental levels and other business charges. Kensington and Chelsea's Retail Commission report on small shops sets out a wide range of recommendations to address the issues facing small and local shops.</p> <p>As stated in response to question 3, until the Use Class Order is amended in order to differentiate between small and large shops, local authorities will often be powerless to prevent the loss of small shops through amalgamation into larger premises. The GLA should lobby government to change the use class system to differentiate between large scale and small A1 units.</p> <p>The way centres look and feel is important in attracting customers and providing a focal point for the local community. We would also suggest that the Mayor investigates opportunities to provide dedicated area-based funding to enable public realm improvements around local centres, for example paving, lighting and street furniture, in order to make local centres safer and more attractive for local people.</p>

SSLC004- Sustain/London Food Link

Review of Measures Designed to Support London's Local and Neighbourhood Shops – Response from London Food Link November 2009

About London Food Link

London Food Link (LFL) runs a network of organisations and individuals who want to make London's food system more sustainable. Membership includes farmers, food writers, caterers and community food projects. The specific aims of LFL are to increase the availability of sustainable food in London, tackle the barriers preventing access to healthy and sustainable food for Londoners and to protect and celebrate London's diverse food culture. LFL is part of Sustain: The alliance for better food and farming. This response is submitted following a consultation with colleagues and members of the London Food Link and represents the general, rather than detailed views of members of that network. LFL has already submitted an initial response to the London Plan, and to commercial growing around London which can be found at http://www.sustainweb.org/localactiononfood/food_and_planning/

Food, Planning and Health

Food, like water, shelter and air, is essential for human existence. London is a city of over 6 million and remarkably little attention is played to virtually the only activity that all Londoners do every day. Spatial planning affects where food is physically available for us to buy and can also influence the type of retail outlet that sells us our food. This in turn will affect what we eat, how we eat it and our long-term physical and mental well-being.

LFL is writing a response to this review because as expressed in the current consultation on a strategy to address health inequalities in London, not all Londoners are able to access a healthy and affordable source of food¹. This is a complex problem influenced by many factors and research has shown that accessibility to a healthy diet may be influenced by the socio-economic status of the person, by the location of shops, whether the food is affordable and good quality and personal choice. The general consensus is that poorer people are less likely to eat as well as richer people², people on lower incomes might end up paying more than the better-off for healthier food³ and that in areas of high deprivation there is more likely to be diet-related ill-health. Moreover The Commission on Social Determinants of Health (WHO) recognises that our environments must be better designed to encourage healthy eating.⁴ LFL believes that neighbourhood shops are essential and can help promote not only healthier eating, but healthier places to live in and should be promoted and encouraged by planning policy for the following reasons:

Food retail outlets in neighbourhood shopping centres are an important access point for many Londoners especially the elderly, socially isolated, and people who find it difficult to use transport to go out of their area for shopping

Neighbourhood shops can offer price competition, opportunities for alternative supply chains and a greater variety of foods for people who cook culturally different foods.

Local shops may be more practical for Londoners who live on their own and find it difficult to carry large amounts of shopping in one shopping trip.

In some areas neighbourhood shops are the most realistic way of buying food as there are no supermarkets nearby therefore maintaining and supporting them is all-important.

The London Food Link's response to the Review questions follow.

1) What pressures do small shops and neighbourhood and local shopping centres face e.g. threats to economic viability, changes in shopping patterns, competition?

Small shops and neighbourhood centres can be a vital source of food shopping for many people. The key pressures facing smaller, neighbourhood shops are that they have to compete with bigger shops or

supermarkets that have economies of scale, therefore sometimes cheaper prices, or a perceived wider range of items for sale. The pattern of out-of-community centre supermarkets that has emerged over recent years means that shops in community centres tend to be convenience or “top-up” shops selling added value items such as packaged food for customers to “add-to” the weekly shop they do elsewhere. They are often limited in the range that they offer because of competition with the supermarkets. Distance from supermarkets then becomes a disadvantage for Londoners particularly around accessing fresh, healthy food. There also some research that indicates that supermarkets have tended to choose the most profitable sites and therefore areas where there are poorer people are disproportionately worse off for food retail.⁵ To add to this, smaller retailers have a misperception that fresh fruit and vegetables are difficult to sell therefore limiting choice even further. This then has a knock-on effect that customers will have to shop elsewhere especially to buy fresh fruit and vegetables and shopping choices become more and more restricted. There is an added complication with the sale of fruit and vegetables because they are perishable and have a limited shelf life so more of a risk to stock if their purchasing is not assured.

A recent study in Tower Hamlets found that 76 per cent of households are within a 10 minute walk of a supermarket, retail market or greengrocers, but 97 per cent are within a 10 minutes walk of a fast food outlet. The researchers also found that many of the borough’s shops do not sell the range of fresh fruit and vegetables necessary for a healthy diet³⁶.

2) What are the advantages of local centres that provide convenient access to goods and services that are needed on a day-to-day basis?

Local centres that include an affordable range of culturally appropriate fruit and vegetables can provide a range of social, economic and environmental advantages to local areas. For example they can provide for people who are elderly, or disabled, and have more limited transport options and those for whom buying food nearer to their home is very important. They may stay open later providing access to working and non-working people. They also have a role as a community hub as a family-based businesses known to local people. If there are more people using a street or shopping parade there may be more people around and this could make it a safer environment. Smaller shops, street markets and food stalls can also be a route for more alternative supply chains e.g. more local producers. They may also sell culturally specific food to suit local populations because the retailer has more freedom to choose the supplier. Independently owned shops can stimulate the local economy, one example although outside London demonstrates that independent shops created more community cohesion, economic vibrancy and fresh items such as fruit and vegetables⁷. There is some emerging evidence that prices for fruit and vegetables do not necessarily cost less in supermarkets; Sustain undertook research looking at prices for fruit and vegetables supplied by farms near London, a community food project and supermarket. Generally the supermarket prices compared overwhelmingly badly both with respect to the community food project who bought their produce from a wholesale market, and to the price direct from the farm⁸.

3. How effective the planning system is in supporting small shops in local high street and where has it failed in recent years?

The two most recent planning documents that strongly relate to the high street are PPS 6 on town centres and PS4 on Planning for Prosperous Economies. They both note the importance of the high street and town centres, as opposed to out-of-town centres as has been previously more supported by planning policy. We support these moves and think they have been produced with the acknowledgment by central government of the importance of having a thriving retail market local to where people live. It is important to note that the sale of fresh fruit and vegetables comes with its own challenges (as noted above) and needs to be considered as a type of outlet in its own right in order to have the desired impact of creating a wide range of affordable, culturally appropriate fresh food for sale and separate planning guidance should be included for these types of retailer.

To illustrate this point further policy 3A.18 of the existing London Plan mentions specifically convenience shopping, banking facilities and post offices however we are concerned that the planning Class Use Order for convenience shopping does not necessarily mean whether there is fresh food being sold at that outlet and there is no way for planners to either see whether there are sufficient food retailers, or to stipulate more of them are needed from the current planning system. We believe that planners can find solutions to this

problem, for example to creating a separate Use Class Order for fruit and vegetable outlets to ensure there is sufficient provision in their area.

4. What are London local authorities doing to support small shops and neighbourhood and local shopping centres through the planning system, Development Plan Documents, or proposals under the Sustainable Communities Act?

A few councils including Hackney and Islington have tried to use ensure a good spread of retail in their unitary development plans and have designated some types of shops with “key local service” or “essential service” status which restricts change of use. Some councils such as Camden and Lewisham also stipulate that there should be neighbourhood parades within walking distance or accessible at a point of 500 metres anywhere in the borough⁹. Most however do not stipulate “food outlet” as an essential service, or ensure that they are considered as essential for inclusion in new build housing developments.

In the final consultation version of the London Borough of Tower Hamlets Core strategy, there are references to the importance of improving a healthy diet for the borough’s population however a clearer direction from the London Plan would send out strong messages of support for other boroughs to do similar things and to guide them in how to tackle this issue from a London-wide perspective. Local authorities and the GLA have recognised the importance of increasing fresh fruit and vegetable outlets. For example the Buywell Retail project is working with 17 independent small retailers across London in order to increase the amount and quality of affordable fruit and vegetables in their stores. This project is being supported by the London Food Board, and with support of the local authorities in the participating areas¹⁰. The Department of Health via the Change4Life programme is also running a similar programme with retailers across the country which has seen the following effect:

“Change4Life corner shops have been really successful in the North East with an average increase of 40 per cent in sales of fresh fruit and vegetables from the stores.”¹¹.

We believe that these initiatives go some way in recognising and tackling the problems around fresh fruit and vegetable access, but the planning system can also facilitate and drive long-term change.

6. How can the Mayor’s commitment to help protect the high street best be implemented through London Plan and other policies?

7. What outstanding actions and opportunities are in order to support and to help small independent retailers in London and facilitate ongoing support?

The London Plan and other policies can help protect and promote high street food retail in many ways including:

Providing clear guidance in the London Plan that fresh, affordable and culturally appropriate fruit and vegetables need to be accessible for Londoners in a range of retail outlets including supermarkets, markets and shops. Fruit and vegetables are an essential part of a healthy diet and because of some of the reasons outlined above, not all Londoners are able to buy healthy food.

Encouraging borough level core strategies to consider fruit and vegetable retail in their Local Development Framework documents.

Supporting a new Class Use Order for fruit and vegetable retail outlet.

Encouraging unoccupied business premises to be used for temporary use food outlets e.g. weekly fruit and vegetables stalls

Providing business support and advice to retailers who wish to sell more fruit and vegetables (e.g. Buywell project)

Restricting the concentration of fast food takeaways near schools, or working with food businesses to sell healthier options e.g. London Borough Barking and Dagenham Supplementary Planning Document or London Borough of Tower Hamlets Core Strategy.

Encourage mixed use development

Support from the local police for businesses that are affected by crime or anti-social behaviour.

Footnotes

1 The London Health Inequalities Strategy; Draft for Public Consultation (August 2009), Greater London Authority <http://www.london.gov.uk/mayor/priorities/health/docs/health-inequalities-strategy-draft-consult.pdf>

2 The London Health Inequalities Strategy; Draft for Public Consultation (August 2009), Greater London Authority <http://www.london.gov.uk/mayor/priorities/health/docs/health-inequalities-strategy-draft-consult.pdf>

3 "Inequalities in food and nutrition challenging "lifestyles"" (Dowler, Caraher, and Lincoln) in Challenging Health Inequalities: from Acheson to Choosing Health (Dowler & Spencer) (2007), Policy Press

http://books.google.com/books?id=lpangCPsvoAC&pg=PA127&lpg=PA127&dq=liz+dowler+et+al+2001&source=bl&ots=Bob9EwKOV_&sig=u9yWrPBjtZSe_uflx2UrYyfSjAQ&hl=en&ei=ZUbwSqHOLomNjAel9fi7CA&sa=X&oi=book_result&ct=result&resnum=1&ved=0CAoQ6AEwAA#v=onepage&q=&f=false

4 Closing the gap in a generation: Health equity through action on the social determinants of health, World Health Organization, 2008

http://www.who.int/social_determinants/thecommission/finalreport/closethegap_how/en/index1.html

5 "Inequalities in food and nutrition challenging "lifestyles"" (Dowler, Caraher, and Lincoln) in Challenging Health Inequalities: from Acheson to Choosing Health (Dowler & Spencer) (2007), Policy Press

6 The London Health Inequalities Strategy; Draft for public Consultation (August 2009), Greater London Authority <http://www.london.gov.uk/mayor/priorities/health/health-strategy.jsp>

7 The Real Choice, CPRE (2006) www.cpre.org.uk

8 Research conducted by Sustain for Community Food Enterprise. Prices collected for 7 weeks in April to June 2008.

9 How London's Planners can improve access to healthy and affordable food (2004) Sustain and The Food Commission http://www.sustainweb.org/londonfoodlink/food_and_planning/

10 http://www.sustainweb.org/buywell/buywell_shops/

11 http://www.dh.gov.uk/en/News/Recentstories/DH_103380

SSLC005-City of Westminster

Dear Ms Jones,

Review of Measures Designed to Support London's Local and Neighbourhood Shops

Thank you for your letter dated the 13th October, and for this opportunity to help with your review of how the planning system and other initiatives can provide support for London's local and neighbourhood shops. The council has long established policies to protect and enhance its shops and shopping centres and welcomes the opportunity to be involved in your project. Please find below our responses to the questions you raised:

1. What pressures do small shops and neighbourhood and local shopping centres face e.g. threats to economic viability, changes in shopping patterns, competition?

In Westminster the Council own approximately 230 shops, these are located mainly in the West End, south and north west of the borough. All other shopping units are in the control of the private landowners and leaseholders. The Council like other authorities in the UK is unable to control the range of shops within the city. Despite having a strong planning policy objectives which seek to secure a range of uses, economic viability and resilience, often a change in shop type occurs as owners seek maximum revenue from their investments.

For example local A1 shops face pressures to change to non-A1 retail uses such as A2 professional and financial services and A3 cafes and restaurants. In these cases where a change of use has taken place contrary to planning policy, the authority has undertaken a number of appeals with mixed success, this illustrates the difficulties in controlling uses.

Recent Health Check surveys of Westminster's Unitary Development Plan (UDP) designated District Shopping Centres rated them negatively in terms of: availability, cost, and in some cases the location of parking; and general traffic congestion. However, the main issues felt to be constraining business were: high overhead/rents, the price of car parking, and the general economy¹. Safety and Security issues were also of concern to businesses. There were mixed opinions about the range of shops and services available and the quality of shops and services.

Although the number of chain stores were considered a problem in some of the centres, others could potentially benefit from more. Most survey respondents in Warwick Way/Tachbrook Street District Centre for example, thought increasing the range of local/speciality retailers was an important planning issue, whereas in the Harrow Road District Centre, over 45% of occupiers felt the centre did not have enough large chain shops to encourage visitors. The surveys concluded that a centre's success depends on a number of issues, including the centre's overall retail/entertainment offer.

2. What are the advantages of local centres that provide convenient access to goods and services that are needed on a day-to-day basis?

Reduced need to travel. Potential to provide access to fresh foods. Potential for community cohesion with associated mental health benefits.

3. How effective the planning system is in supporting small shops in local high street and where has it failed in recent years?

The council's latest Annual Monitoring Report (AMR) showed that during 2007-08, there was almost 18,000 sqm A1 retail floorspace proposed and approved, representing a net increase of almost 4,000 sqm A1 floorspace in Westminster from the previous year. 98% of the proposed increase related to sites within Westminster's designated hierarchy of shopping centres. However, the number of applications/appeals approved and refused show limited demand for new retail floorspace in the District Centres.

Although through the Use Classes Order, the planning system can help protect shops in local shopping centres, there is currently limited control over the protection of small or independent shops, because they can be merged into larger units and/or change ownership without the need for planning permission.

Through the Council's Unitary Development Plan (UDP) policies, we have managed to protect shops within our hierarchy of shopping centres, and a large number of Westminster's shopping centres are considered to be economically healthy. Certain centres in the north west of the borough are performing less well, but

policy changes, and the creation of a 'North Westminster Economic Development Area'² covering these centres will seek to reverse their fortune.

4. What are London local authorities doing to support small shops and neighbourhood and local shopping centres through the planning system, Development Plan Documents, or proposals under the Sustainable Communities Act?

The council's UDP policies generally protect shops and services throughout Westminster, with Class A1 retail, especially local convenience shops, recognised as being particularly important. The council's emerging Local Development Framework (LDF) Core Strategy DPD will continue to offer protection for A1 retail throughout Westminster, and for non-A1 retail within designated shopping centres to protect them from changing to uses that do not serve visiting members of the public. Although a significant proportion of these protected uses could be considered 'small shops', there is no particular policy in the UDP or emerging Core Strategy, to protect 'small' shop uses.

Although local shops are currently protected within Local Shopping Centres, the council has limited control over their amalgamation (i.e. knocking 2 shops into 1) where planning permission is not required, and which often accompanies a change of shop type away from a local shop.

As well as protecting shops and shopping centres through the application of planning policies, the council also has a number of programmes in place to improve the shopping environment in its designated centres. The council's 'Civic Streets' programme was established to renew and improve every one of Westminster's 7 (UDP designated) District Shopping Centres. Piloted in St. John's Wood High Street District Centre, it involved improvements to the pavements, lighting, and street parking facilities, all of which had a positive effect on the shopping environment. Further improvements have been delivered in other District Shopping Centres and the Council is currently consulting on plans for further major improvements to the Church Street/Edgware Road and Warwick Way/Tachbrook Street District Shopping Centres.

Where necessary the Council has worked with a range of local partners to address multiple factors having a detrimental effect on particular District Shopping Centres e.g. anti-social behaviour, poor visual appearance. For instance, regeneration of the 'Prince of Wales Junction', which was an under used public space blighted by anti-social behaviour and therefore key to improving the shopping environment in the Harrow Road District Centre. Here, the council is encouraging more street based events to encourage shoppers into the area, and has recently enabled the creation of a new street market, 'Maida Hill', the first new regular market in Westminster for 50 years. Close liaison with community representatives and the Police have also been key to reducing crime in the area. This work has helped create a sense of community at the previously undesirable and underused junction, which should in turn kick-start improvements to the rest of the shopping centre.

The council is also working with local traders in this area to create a more attractive and consistent appearance for the District Centre. To this end there is potential for retailers to become involved in a 'Shopfront Grant Scheme' scheme which will result in high quality shop front improvements with a strong focus on the restoration of traditional frontages.

5. What, if any, progress has been made in relation to planning and related areas following the recommendations made by a number of bodies over the past years? (e.g. Parliamentary Small Shops Group in 2005, New Economics Foundation -Clone Town Britain, Competition Commission Inquiry into the UK Groceries Market, 2008)

It is not possible to manage competition between Class-A1 uses, within the remit of the existing Use Classes Order.

6. What outstanding actions and opportunities are in order to support and to help small independent retailers in London and facilitate ongoing support?

Improving the visual appearance and enlivening under utilised public space is critical to improving the health of District Shopping Centres. Much of the work detailed in response to question 4 above has been funded by the Council through its commitment of Local Authority Business Growth Incentive resources to economic development projects. The council would welcome a dialogue with the GLA Group on the possibility of identifying further funding streams managed either by the GLA or other regional and national agencies that could be pooled to support this type of work.

In your letter you asked if there were any other relevant issues that should be considered in your review of ways to support London's neighbourhoods and shops. In Westminster major landowners / leaseholders play a valuable role in shaping and regenerating shopping streets and neighbourhoods. An example of successful place making through investment and careful lease of property is Marylebone Village. Here the landowner the Howard de Walden Estate encouraged a diverse range of new uses in and around Marylebone High Street, this approach has helped to revitalise the area. Key landowners have the power to achieve this through their ownership and lease of large parts of the city. These owners have a long term interest in areas and work to maintain and achieve balance of uses which will maintain and support the local economy and communities. Other landowners who have made a contribution to creating attractive local and neighbourhood shops include the Crown Estate, Grosvenor Estate and Portman Estate. In reviewing of measures, the council feels it is important to recognise the contribution these stakeholders have in shaping places.

We welcome this opportunity to inform the London Plan policy review process.

Footnotes

1 Westminster District Centre Shopping Area Health Checks 2007 - Occupier Survey Results, 2006

2 Westminster City Council Local Development Framework, Draft Core Strategy Policy 12.

SSLC006-London Borough of Lewisham

Dear Alexandra Beer
Review of Support for Local Shopping

I refer to your letter dated 13th October 2009 concerning the above. Due to pressure of other work I have not been able to devote much time to your request, but in the hope that something is better than nothing I set out below some thoughts on your questions.

1. What pressures do small shops and neighbourhood and local shopping centres face e.g. threats to economic viability, changes in shopping patterns, competition?

Comment

The three factors you mention are pressures on local shops but in addition the impact of the economic recession, with less spending on consumer goods must also be an issue. I would add that we have experienced in the long economic 'boom' the issue that in local parades there has been pressure to change the use of local shops to residential use. This is not just a question of economic viability as the shop may have been profitable but the value of residential use was so great that a change of use became attractive for short term gain.

2. What are the advantages of local centres that provide convenient access to goods and services that are needed on a day-to-day basis?

Comment

Local shops are in principal sustainable in that they can be reached easily by foot or cycle and hence reduce the need to travel by car. In inner London in particular there are large numbers of households who do not own a car and many on low incomes who benefit from being able to shop for day to day needs locally. There is an advantage that community cohesion benefits from the personal relationships that build up by people shopping locally. The provision of local jobs is also relevant as many shop workers also live locally.

3. How effective the planning system is in supporting small shops in local high street and where has it failed in recent years?

Comment

The planning system can offer some level of protection for local shops through policies that prevent a change of use to some other land use or designate primary and secondary retail frontages which specify the level of shop use that must be maintained before a change of use will be acceptable. It is also common to ask any applicant who wants a change of use to provide evidence that the shop has been marketed for a shop use at a reasonable rent to provide evidence of lack of demand.

4. What are London local authorities doing to support small shops and neighbourhood and local shopping centres through the planning system, Development Plan Documents, or proposals under the Sustainable Communities Act?

Comment

Policies are included in the Unitary Development Plan and will be continued in the LDF to protect retail use by designating primary and secondary frontages. In Lewisham we also have a town centre managers team who offer support of various types to local shops.

5. What, if any, progress has been made in relation to planning and related areas following the recommendations made by a number of bodies over the past years?2 (e.g. Parliamentary Small Shops Group in 2005, New Economics Foundation -Clone Town Britain, Competition Commission Inquiry into the UK Groceries Market, 2008)

Comment

No comment

6. How can the Mayor's commitment to help protect the high street best be implemented through London Plan and other policies?

Comment

The Mayors proposals regarding affordable shopping units as part of planning obligations is an idea worth exploring.

7. What outstanding actions and opportunities are in order to support and to help small independent retailers in London and facilitate ongoing support?

Comment

No comment.

I hope the above is of some help.

SSLC007-London Borough of Islington

Dear Alexandra

I am attaching a report produced in 2006 by the Council's sustainability review committee. It contains information on how the council's planning policies are currently used to protect existing local shopping area as well as covering other issues related to the success of local shops.

The council also produce this leaflet on local shopping areas

<http://www.islington.gov.uk/DownloadableDocuments/Business/Pdf/shopislingtonguide2009.pdf>

and has a page promoting shopping areas

<http://www.islington.gov.uk/Leisure/TourismAndTravel/attractions/shoppingtourism/default.asp>

Spatial Planning

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(Att.: Report of the Sustainability Review Committee, London Borough of Islington, April 2006, on the 'Helping Local Shops' investigation of the Sustainability Review Committee
[<http://www.islington.gov.uk/democracy/>])

SSLC008-Campaign for Better Transport

Dear Paul

Measures to support local and neighbourhood shops

We note that the Planning and Advisory Committee is considering measures to support local shops and would be grateful if you could draw the attention of the Committee to the following comments and suggestions.

Campaign for Better Transport supports measures to encourage local shopping and other facilities which can be reached on foot and by bicycle and which therefore reduce car use, are consistent with the requirement of Planning Policy Guidance 13 to reduce the need to travel and work to reduce carbon emissions.

We welcome the proposal in paragraph 4.48 (quoted in paragraph 3.5 of the Report Number 4 to the Committee) of the draft London Plan that local retail strategies should be developed in partnership between communities, the retail industry and local authorities. This strategy should identify areas under-served by retail facilities and establish the means to stimulate regeneration. However the proposal does not go far enough. Strategies should also identify deficiencies, and seek to make them good, in the availability of other services and amenities which might be located at local centres and which would contribute to their diversity and vitality. Such facilities could include, for example, health centres and doctors' surgeries, council one-stop shops, post offices, libraries, nurseries and youth or older persons' or other community facilities.

Other suggestions for measures which local authorities might take include:

- Designating sites within local shopping centres for the uses mentioned above
- Identifying land in and around local shopping centres which might be used for housing in order to raise the residential density in the immediate area and increase the customer base for local shops
- Promoting the location of retail and other facilities near rail stations
- Improving public transport access to local shops perhaps by adjusting bus routes or the location of bus stops and treating neighbourhood shopping centres as local transport hubs
- Improving walking and cycling access, and access for people with disabilities, to local shops from the residential hinterland by for example introducing 20 mph limits and making it more convenient to travel to the shops on foot and by bicycle than by car
- Providing rate relief if this is necessary to ensure viability of shops or other amenities
- Creating a level playing field for local shops to compete with more remote superstores by introducing a levy on retail parking spaces
- Withholding planning permission for further large retail developments which depend on a wide catchment area and undermine neighbourhood shopping centres.

I will also send these suggestions to the Chair of the Committee.

I hope this is helpful.

SSLC009-British Council of Shopping Centres

Dear Ms Jones

REVIEW OF MEASURES DESIGNED TO SUPPORT LONDON'S LOCAL AND NEIGHBOURHOOD SHOPS

On behalf of BCSC we are pleased to respond with the following views regarding the above in response to your letter of 13 October 2009.

We represent businesses operating in the retail property sector. Our membership is a broad church of nearly 3,000 property professionals including owners, developers, retailers, surveyors, architects and public sector managers.

It is recognised that smaller shops have faced a serious threat to their livelihoods over recent years. This is as a result of a combination of out of town regional shopping centres, out of town and edge of town large supermarkets and increased product range of large format retailers. In addition changing social patterns to bulk supermarket shopping, local authority parking restrictions and charging, reduced choice of retailers and deteriorating public realm in our high streets, along with an increasing and disproportionate business rates burden, have affected the viability of small independent retailers.

Our members have long supported independent retailers and recognise them as a key part of the vitality of shopping centres and town centres and in particular our high streets. They recognise the issues related to a small number of national multiples forming the shopping nucleus of every centre and are committed to finding solutions to diversity, better shopping mix and better placemaking, by the incorporation of a broader mix of retailers. We recognise that this is a contributor to commercial success and the attractiveness of retail locations.

We have consistently highlighted the contribution of independent retailers as one of a series of strands to be encouraged by local authorities and developers alike to maintain high streets. In fact, following the publication of our research report 'The Smaller Towns Report' (enclosed) highlighting the issue of regenerating our smaller towns and suburbs, we held a joint seminar with the GLA on this subject at City Hall.

The best way for independents to succeed is for them to trade profitably. The measure of a profitable location is a constant footflow of customers past their door. Traditionally in towns and in shopping centres, this is created by the proximity of larger anchor traders, whereby the natural routes from parking to anchor, or groups of major stores, would route people also past smaller shops. In addition, a commitment to placemaking would seek to design an offer of independent traders and food and beverage outlets to enrich and prolong the shopping trip.

Historically, internalised shopping centres would seek to maximise value by achieving prime pitch throughout. Today new shopping is generally designed as a range of streets with a range of values integrated into a town centre and therefore identifying locations for smaller traders is not difficult and is desirable.

Even if new additions to a high street involve solely national traders, the planning of the project should ensure that it is integrated with the existing stock such that the pitch for independents is improved. One of the common fallacies with new shopping projects is that it damages existing traders. In practice the opposite should be true leading to additional trade for all. Examples of landlords targeting independent retailers to achieve better tenant mix are Howard De Walden Estate in Marylebone High Street and Land Securities at Princeshay Exeter. In addition commercialisation (the generation of non-core revenue by shopping centre

owners) in shopping centres is increasingly providing a space, and support, for niche and start up retailers to flourish and expand.

It is rare that there is a shortage of available shops in existing high streets for independents. Unfortunately some local authorities have allowed their attractiveness to decline through a deterioration of the public realm, reduced public transport, high parking charges and conflicting planning consents for competing centres.

PPS6, which is being incorporated into a policy statement for prosperous communities (PPS4), is intended to be the planning control to protect town centres and in itself should be adequate protection. Recent CLG statistics show however that less than c. 30% of new retail floorspace has been within town centres. The CLG definition of edge of town being outside 300m means that it is possible also for new space to be consented which is not integrated with existing retail and that footflows can be damaged.

Considering how a concept of 'affordable shopping' could be introduced or applied highlights further the problem with the issue:

- What is the minimum size of development this could be applied to?
- Do you impose an artificial rent as a percentage of the market rent?
- Do you impose a percentage requirement for the number of independent retailers?
- How would a new use-class for independent retailers be defined?

In all of the above examples value would be undermined at a time when few projects are viable and capital values have fallen by up to 50% in some areas. This is because the rental income will be reduced and the covenant strength will also be reduced. In addition a developer has to be in a position to take the risk on an independent trader succeeding since he will now be penalised further by the imposition of empty rates.

Independents also are not always keen on being within new developments, there would commonly be a service charge in addition to a rent, and they may be bound by a tenants' shopfitting guide to achieve certain minimum design standards for their shopfront and fit out.

The solution is in planners having the correct commercial retail guidance and understanding in generating development plans and regeneration proposals which deliver proper retail-led masterplanning frameworks for new retail space, integrated with existing retail street patterns and footflows.

In small towns and suburbs there is no one-size-fits-all solution. Local authority strategies must include all strands including retail planning, public realm improvement, car parking facilities, avoiding penal car parking charges, public transport, town centre management, evening economy strategy, residential planning strategy, security etc. Local authorities are frequently fixated on how to attract high profile department stores whereas their energy can often better be directed at a combination of smaller complimentary measures to achieve local distinctiveness and convenience to satisfy peoples desire to shop locally rather than regionally.

We would of course be happy to discuss our position on this issue in more detail.

Executive Director

SSLC010-Competition Commission

Dear Ms Jones

REVIEW OF MEASURES DESIGNED TO SUPPORT LONDON'S LOCAL AND NEIGHBOURHOOD SHOPS

1. Thank you for your letter of 13 October 2009.

2. The Competition Commission conducted its Groceries Investigation from May 2006 until April 2008, when our report on the investigation (Report) was published. While we do not have sufficient information to respond directly to the questions you have raised, we can point to some of our findings in the Report which focus on local and neighbourhood shops.

3. We found that, UK grocery retailers were, in many important respects, delivering a good deal for consumers. However, action was needed to improve competition in local markets and to address relationships between retailers and their suppliers. Chapters 4, 5 and 7 in particular considered the relationship between large retailers and convenience stores. Some of the conclusions included:

- we found that while larger grocery retailers (larger than 1000 to 2000 sq metres) and mid-sized grocery retailers (all stores larger than 280 sq metres) provide a competitive constraint on convenience stores, this constraint was asymmetric, as convenience stores did not act as a material competitive constraint on large or midsized grocery stores (see chapter 4 of the Report);

- we observed that the number of convenience stores nationally had increased slightly since 2003, although the number of independent non-affiliated convenience stores had declined (paragraph 5.5 of the Report). We also observed that convenience store revenues had increased at a greater rate than that of total grocery sales (paragraph 5.9);

- overall, we found that the moderate growth in convenience store numbers and revenue indicated that any distortion in competition between large grocery retailers and other convenience store operations was not causing a broad-based decline in convenience store numbers or revenues, including the number and revenues of independent non-affiliated and symbol group convenience stores (paragraph 5.11);

- we also considered the specific impact of the entry of a large grocery store on convenience stores in a local area. Overall we observed that entry by a new larger grocery store was, on average, associated with a reduction in the number of greengrocers and trading markets and an increase in the number of bakers in the following one to two years. However, it had no systematic identifiable effect on the number of butchers, convenience stores, delicatessens, fishmongers, health food stores and off-licences (see our analysis in Appendix 5.2 of the Report);

- we considered a number of large grocery retailer practices to consider whether they distorted competition between themselves and independent convenience stores, including a 'waterbed effect' in supplier pricing to grocery retailers, a 'tipping point' in the financial viability of grocery wholesalers, below-cost selling, local vouchering and expansion by Tesco and Sainsbury's in convenience store retailing. However, we did not find that any of these practices led to an adverse effect on competition in the groceries market (paragraphs 5.19 - 5.105 of the Report); and

- we found that barriers to entry in convenience store retailing, including planning barriers, were limited (see section 7 of the Report).

4. A full copy of the Report, and Appendices, can be found at <http://www.competitioncommission.org.uk/inquiries/ref2006/grocery/index.htm>, along with a number of other documents generated by both ourselves and third parties during the inquiry.

SSLC011-London Borough of Wandsworth

Dear Alex

Review of Measures Designed to support London's Local and Neighbourhood Shops

This is an officer-level response from a planning perspective, co-ordinated with Mike Brook from the Council's Economic Development Office. I have supplied links to relevant Council reports on retail/monitoring and attach the Town Centre Annual Report, prepared by the Economic Development Office.

Comments on consultation questions:

1. What pressures do small shops and neighbourhood and local shopping centres face? Generally, threats to economic viability, changes in shopping patterns, increasing use of on-line shopping, competition, parking restrictions, rate revaluation, lack of critical mass, loss of essential services such as post offices, lack of bulk purchasing power, high prices; limited choice and poorer quality goods. However, there is great deal of variation between the amount of retail (A1) in Local Centres and Important Local Parades in the borough and this may be related to footfall (ie near a station or employment location), or the type of population in the catchment.

2. What are the advantages of local centres that provide convenient access to goods and services that are needed on a day-to-day basis?

Proximity (walkable/cyclable distances), personal service, and longer opening hours. Local Centres, and the Council's designated Important Local Parades are typically within 400m from most residential areas in the borough, and therefore accessible on foot, contributing to sustainability objectives. They also provide necessities for the elderly or disabled residents who are not able to travel far. Some of the Local Centres contribute to the evening economy, particularly for restaurants and bars.

3. How effective is the planning system in supporting small shops in the local high street and where has it failed in recent years?

The ability to protect key shopping frontages/parades and to set a threshold for A1 (retail) uses has generally been successful in Wandsworth. The monitoring reports in the link below offer some context and include information on vacancies over a 10-12 year time period.

http://www.wandsworth.gov.uk/downloads/download/154/retail_surveys

4. What are London local authorities doing to support small shops and neighbourhood and local shopping centres through the planning system, Development Plan Documents, or proposals under the Sustainable Communities Act?

Planning system: primarily by identifying protected shopping frontages, preventing out-of-centre retail that could draw customers away. Small shops: only real protection can be given when represented with an application for new build shops, where permitted development rights can be removed to prevent amalgamation and/or subdivision, and to control changes of use within the A use class order. Otherwise it is permitted development to merge smaller shops into larger ones. As there is an issue of protection of small shops in part of the Borough, we are proposing a policy (DMS10) in the forthcoming Development Management Policies Document which seeks to protect small shops in this area, but note this can be applied only through redevelopment proposals for reasons outlined above. You can view this via the link below.

http://www.wandsworth.gov.uk/info/856/local_development_framework/587/development_management_policies_document

The Economic Development Office provides grants and loans in identified parades to improve the appearance of shopfronts, (Town Centre Improvement Scheme), operates a vacant shops scheme (ie by providing a display in vacant shopfronts) and offers small business rate relief.

5. What, if any, progress has been made in relation to planning and related areas following the recommendations made by a number of bodies over the past years? (e.g. Parliamentary Small Shops Group in 2005, New Economics Foundation -Clone Town Britain, Competition Commission Inquiry into the UK Groceries Market, 2008).

We are not aware of any direct progress being made – the position may become clearer on publication of the final version of PPS4.

6. How can the Mayor's commitment to help protect the high street best be implemented through London Plan and other policies?

By controlling out of centre uses, even in regeneration areas if these are not in defined centres and ensuring that supply does not exceed demand. Not only do you need a supportive planning policy framework, but an active/proactive well resourced town centre management initiative through the LDA is also required. Other measures could include; supporting the development of local private sector-led partnerships; making sure Transport for London have a better understanding of their customers – especially regarding shopping trips; joint working between local councils/LDA/TfL to create and deliver plans to make town centres more attractive; ensure the Metropolitan Police recognise the importance of business crime.

7. What outstanding actions and opportunities are in order to support and to help small independent retailers in London and facilitate ongoing support?

This goes beyond the remit of planning, which is involved in meeting current and future shopping needs in a sustainable way. Outside the planning system, there should be funding for appropriate local business advice. Business Link is of limited use to small independent retailers and in any event there is nobody funded to deliver local advice. This could be achieved through support for town centre managers.

Q If there is any other information you think is relevant to the review please let us know.

The Council's has a Town Centre Management Initiative which has been largely successful (see attached report). Our latest vacancy rate monitoring shows that main town centres' vacancy rates have not gone up despite the recession.

The consultation responses to the drafts of proposed PPS4 should be helpful. These should be available on the CLG website. The proposed review of permitted development rights for commercial buildings may also be relevant.

SSLC012-John Lewis Partnership

Review of Measures Designed to Support London's Local and Neighbourhood Shops
Response from the John Lewis Partnership (JLP)

5 November 2009

1. What pressures do small shops and neighbourhood and local shopping centres face?

The pressures faced by small shops and neighbourhood and local shopping centres are well documented. Many find themselves competing for business with national multiples, who will benefit from economies of scale in their operational and buying costs. The London Assembly will be aware of many of the key challenges, not least the high rental costs of retail premises in many parts of London.

In our view an often overlooked challenge is the lack of experience and expertise in retailing on the part of some of those looking to operate smaller outlets on a stand alone basis. JLP invests heavily in the training of its 70,000 Partners (all employees are CO-owners in the business), but we recognise that recruiting strong candidates for retail jobs and providing training and career progression opportunities will be particularly difficult for smaller retailers. We believe there is an opportunity for Government, local Job Centres, major retailers, local Council employment and training initiatives and independent shop-keepers to work more closely together to address these challenges.

Although there is a popular view that small shops are struggling in London, faced with the opening of larger multiples, we are aware that some evidence suggests the position is not as bad as we might fear. We make no judgment on the findings, but were interested to read the conclusions of the work carried out by the University of Southampton in connection with the recent Competition Commission investigation into the grocery market. The University's report is available via the NRPF's website (X. ,X ;. t i ! ~ i l : . ':c' !'i ,l \ i . . , 1 :l 2iX!O.i>.-!l)a nd might be of interest to the Assembly.

2. What are the advantages of local centres that provide convenient access to goods and services that are needed on a day-to-day basis?

Again, the advantages of local convenience shops are well known and well documented, particularly in offering easy access to services for local communities. Local centres provide a centre of focus for communities, a place to meet and therefore help to support community cohesion and social integration. Local centres are very important to giving a "sense of place" to a neighbourhood, providing a distinctive offer that meets the immediate needs of the local population. It is also worth noting that local centres often are (and certainly should be) well served by public transport systems (particularly bus routes) and therefore encourage access from the widest range of local community.

John Lewis and Waitrose stores are predominantly in town and city centre locations. John Lewis plays a major role in sustaining London's retail offer, particularly in Oxford Street, Brent Cross and in its new anchor shop under development in the Stratford City regeneration zone, as well as plans for a future shop in Croydon. Similarly, Waitrose is increasingly looking at opportunities to open smaller convenience shops on London high streets. The new shop at Crouch End is an example of this smaller format shop, bringing back into use an existing vacant shop unit, and enabling us to serve our customers at the heart of their community.

Retail diversity benefits everyone. JLP recognises the advantages of having a good retail mix on high streets. Improving retail diversity and developing a sense of local character are important components of a strong consumer offer. Local planning authorities should be planning for dynamic retail communities, and not allowing one or two large operators to dominate high streets.

3. How effective is the planning system in supporting small shops in local high streets and where has it failed in recent years?

The planning system does not (and need not, in our view) aim directly or specifically to support small shops in local high streets. Instead, it seeks to protect the vitality and viability of the high streets and town centres themselves. Indirectly this will, of course, mean seeking to protect the identity, individuality and retail mix of those high streets and town centres. We consider that the necessary support for small shops cannot readily be achieved through planning policies. Instead, practical and physical measures are likely to be more effective (such as training, support, assistance in finding suitable premises etc).

With regard to how effective the planning system has been in supporting local high streets, it appears to us that there has been a significant improvement over the 15 years that the Government's "town centre first" policies have been encapsulated into successive national planning policy guidance and statements (PPG6 and PPS6). The effect of these policies has been to reverse the decline in town centre investment and control more effectively the proliferation of out of town development.

4. What are London Local Authorities doing to support small shops and neighbourhood and local shopping centres through the planning system, Development Plan Documents, or proposals under the Sustainable Communities Act?

Generally, London Boroughs are using the national policy requirements of PPS6 to ensure that high streets, town centres and local centres are properly protected. One or two local authorities appear to be moving towards policies seeking small units to be provided by way of Section 106 Agreements in large retail developments. However, we believe this to be a mistake as it is unlikely to be widely effective and will only serve to jeopardise delivery of further retail development.

We are concerned that some local authorities are not doing enough to support the vitality and viability of their high streets. Some appear to be failing to ensure that they have a proper understanding of the role and function of their high streets, the local catchments that they serve, the mix of uses that should be provided, and the price points at which those services should be aimed to meet local needs. Some local authorities are making significant headway on this, in particular by appointing Town Centre Managers and carrying out detailed research into their town centres and high streets in order to ensure that local planning policies can be fixed so as to best support the vitality, viability and social and community functions of those shopping areas.

We would encourage the London Assembly to seek ways to encourage local authorities to do more of this. We consider these to be much more effective methods of helping small shops to thrive, rather than by imposing ill-conceived requirements through Section 106 Agreements on occasional large retail developments.

5. What, if any, progress has been made in relation to planning and related areas following the recommendations made by a number of bodies over the past years?

We are pleased that draft PPS4 seeks to maintain the Government's "town centre first" focus for new retail development. We believe that this will continue the good work of the last decade and will continue to encourage developers to invest in town centre schemes, which are generally more difficult, more costly and more time-consuming to deliver, when compared with out of centre development. Town centre developments and redevelopments require certainty in the form of constant, clear planning policies, in order to support compulsory purchase and the planning processes. We are confident that these points have been understood by DCLG in preparing the draft PPS4 document consulted upon over the summer.

Appendix 2 of the Assembly's 13 October letter lists the key recommendations of a range of other studies. We have not had the opportunity to review all of these in detail. We would welcome the opportunity to discuss some of these proposals in greater detail. Some are workable and might be beneficial. Others would be counter-productive and have significant unintended consequences.

6. How can the Mayor's commitment to help protect the high street best be implemented through London Plan and other policies?

As noted in our response to question 4, above, we believe that the Mayor can do more to support high streets by encouraging Borough Councils to have a much better understanding of the role, function, health and vitality of their high streets. This would enable planning policies to be set that genuinely seek to address local needs, protect local high streets, and encourage place making at the heart of local communities.

As noted above, we strongly believe that the proposal to impose Section 106 obligations on retail developers to provide small units would be ineffective and counter-productive. It would be ineffective because, realistically, there will be relatively few large retail developments likely to deliver these section 106 obligations. A more effective and wider ranging solution is required. It is likely to be counter productive because it places an additional tax on retail developers, it is very unclear how these small units will be managed and controlled, and we understand anecdotally that similar mechanisms put in place by London Councils to secure affordable office space have been largely unsuccessful. We would therefore urge the London Assembly to take on board the research and recommendations of the London First Retail Commission, published in October 2009, and to look at ways to incorporate the Commission's recommendations into Mayoral policy.

Alternative measures

The Mayor's current proposals are restricted to 'major new retail developments'. We would recommend additional measures to foster diversity and vitality on existing High Streets. At a minimum, the GLA should encourage the take-up of best practice measures to promote diversity - the London First Retail Commission's recommendations are useful in this regard. In the planning context, we believe it is vital that local authorities understand fully the specific role and function of their individual high streets, basing policies on well-informed and comprehensive insight into the needs of local communities. In part, this is an evidence gathering exercise. But there is also significant scope for the greater use of Town Centre Managers to work alongside retailers, landowners and Council planning and policy officers to maximise opportunities and improve communication and understanding.

In addition, we suggest that developers should be challenged to demonstrate how they will deliver diversity through Local Development Frameworks and Local Authority planning briefs:

In the short term this would mean encouraging local innovation as well as behaviour change by prompting Councils to incorporate best practice proposals into local planning frameworks and Boroughs to promote diversity as condition for granting planning permission.

In the medium term the GLA could seek to implement retail diversity measures across London, for example requiring Councils to incorporate measures into Borough plans and directing changes to LDFs where necessary.

The GLA and London Boroughs should draw on the experience of developers who have successfully delivered High Street vitality, such as Cadogan Estate (Sloane Street) and Welbeck Land (Marylebone High Street).

In addition the GLA could provide incentives such as:

Grants to support small businesses improve the fabric of their shops

Business assistance or advisers, perhaps working in partnership with banks, lawyers and accountants

Encouraging Economic Regeneration Units within Local Authorities

Encouraging the formation of landlord/operator management groups, working alongside BIDS where they exist

We would hope to see the following types of measures emerge as outcomes:

Flexible rent structures - flexible payment terms and turnover-based rents for smaller units in major retail developments

Flexible contracts - shorter leases and more break clauses

Creative use of space - more zoning of space within large developments, use of 'side streets'

Better management - greater use of BID's and other 'city centre management' bodies, to improve co-ordination of retail spaces and forge links with surrounding retail zones.

Landlords and operators should both be involved

In the current economic climate, the Mayor and GLA should not implement measures that could hold up development and/or impose further costs on operators. If such measures are genuinely considered necessary in the longer term, we suggest that they should not be phased in until there has been significant recovery in the property, development and retailing economies.

7. What outstanding actions and opportunities are in order to support and help small independent retailers in London and facilitate ongoing support?

As noted in our response to question 1, we consider that one of the key issues for small independent retailers is a lack of training and support both in terms of running their businesses and for their shop staff. We strongly support the Government's involvement in setting up the National Skills Academy for Retail, and similar initiatives, and believe that this will offer opportunities for those looking to run small independent retail businesses to gain experience and benefit from the expertise of larger organisations who have made a success in the retail sector.

There is also an opportunity for local retailers to work together (whether through BID's, local Chambers of Commerce, through local loyalty card schemes, etc) to find initiatives to raise the profile of their high streets and to build customer allegiance to local shops. John Lewis and Waitrose actively encourage their branch managers to be involved in such local working groups, supporting local business communities, and we are keen to share our experience with neighbouring independent retailers.

SSLC013-London Borough of Redbridge

Dear Madam,

Review of Measures Designed to Support London's Local and Neighbourhood Shops

Thank you for your letter dated 13 October 2009 in relation to the above matter and apologies for not having responded sooner. The following comments are made from the perspective of the Planning Policy and Information section at the London Borough of Redbridge.

Small local and neighbourhood shops are the mainstay of the Redbridge retail sector and are concentrated in designated town centres and key retail parades across the borough. Until recently small shops were a thriving and healthy part of the local economy, despite competition from larger supermarkets in Redbridge and other nearby boroughs.

Since the onset of the recession however, retail vacancy rates for all types of shops have been growing. The most recent land use surveys show that Ilford Metropolitan Town Centre has been hit hardest. Its vacancy rate has now reached 10%, with (unexpectedly) a higher rate of vacancies along the High Road/Primary Shopping Area than in the outlying Secondary Shopping Area.

Survey data (where available) suggests that the smaller centres where local and neighbourhood shops predominate are suffering lower vacancy rates. For example, the Local Centre of Ilford Lane, while located adjacent to Ilford Metropolitan Centre, has a much lower vacancy rate. Ilford Lane is a multi-cultural shopping destination characterised by generally small shop units serving the local community. Indeed there has been a spate of subdivisions of existing larger units in recent years. It may be that this type of local retail format responds more flexibly to market conditions and is more resilient in the face of the recession than the mainstream High Street retail format.

The former Redbridge UDP contained a large number of very prescriptive policies governing land uses in each town centre. These policies acted not just to protect retailing, but to restrict changes between different types of retail use. The Council realised that this approach often prevented retailers from responding to new market opportunities and was not assisting the regeneration of the town centres.

The current Redbridge LDF contains a much smaller number of more flexibly worded retail policies. These do not explicitly deal with "local" or "neighbourhood" shops, although by providing broad protection for ground floor retail uses within designated Town Centres, Local Centres and Key Retail Parades, that is effectively what they do. Policy seeks to ensure that the retail role remains dominant with generally no less than 70% of the total number of units being A1. Policy also seeks to limit the collective total of A3 to A5 uses to no more than 20% of the total number of units and calls up the sequential approach of PPS6 when new retail development outside these centres is proposed.

Based on experiences at Redbridge, it would be useful for the London Plan – while generally protecting retail uses within town centres – to support a flexible approach to change of use between different types of retailing so that traders can respond to changing market opportunities.

Recent advice from the Government also seeks to promote a more flexible approach to change of use in town centres. Looking after our Town Centres (CLG, April 2009) encourages Local Authorities to use Local Development Orders to extend permitted development rights for changes of use within town centres in an

effort to bring empty shops back into use. It may prove useful for the boroughs, if the London Plan explored this further, including the identification of appropriate types of use class change which could be deemed permitted development without endangering the predominately retail role of town and local centres.

SSLC014-Independent London

Review of Measures Designed to Support London's Local and Neighbourhood Shops

I am not really in a position to comment on all the proposals already in place and what changes have taken place because of them. I do agree with most of the proposals listed on page 4 of your document. However I do think little progress has been made since 2005 and since organisations like ourselves have been talking about the current situation. However we do feel for example things like watchdogs or retail ombudsman always seem to have no teeth to act (as in the telecoms, consumer and energy industries) and so become another useless tier of bureaucracy. There is a danger of creating too many quangos with no real power. Things like farmers' markets are not beyond criticism there, many of these seem to be for food snobs to buy over priced olives brought directly by van from a supermarket in France. Often we see many of the same farms supplying different markets around London, creating a new monopoly. They may look good but delve a little closer and all is not genuinely well, in terms of local markets selling local fresh produce. Why not let small producers or even allotment holders in London sell in farmers markets.

Benefits of small shops

And by small shop my understanding is one run directly by the owner, who has direct involvement with the local community and does NOT employ a manager to run the shop on a full time basis.

The benefits are huge for the community, if a shop is run by its owner it shows a commitment by the owner to that community, any poor products or services and he/she will hear about it directly from the customer. This makes the shop directly answerable to its communities needs and in what should be a positive way. Imagine this scenario where all the shops are locally run. Take for example a baker that makes its own bread everyday, the locals can offer feedback on a daily basis on the produce and perhaps share a coffee with the baker. This could play a big part in community cohesiveness and cannot be underestimated.

At the moment we are faced with Greggs a very poor bread supplier opening another 600 branches in the UK, not because it makes great bread but because it was able to raise the finance. It hopes to squeeze out any competition in the streets where it will operate.

Planning initiatives

Shop Usage: Certain shop usages should be identified as being important to a community and these usages should be protected. In other words it should be difficult for a franchisee or other developer to secure a property, for example an old bakery and to turn it into another coffee shop. I believe this would protect key types of shop businesses that struggle in particular areas with high rents while at the same time making them less attractive to speculators.

The types of shops I would refer to as key (often threatened) would be hardware, (most food shops) green grocers, butchers, fishmongers and it should be far harder for betting shops and fast food outlets to gain premises. Their spread should be restricted by numbers. Premises should only be let to charity shops as a last resort. Nationally I believe franchises should be limited in number to something like 600 in total for the country, to prevent them from flooding the streets and quashing any new activity. With globalisation money has become cheap to borrow allowing often foreign owned companies to spread their businesses like wildfire across the country.

Finally, I also feel that once planning applications from supermarkets have been refused, they should be denied leave to appeal for at least 2 years. The to and fro of planning applications is too demanding on local councils.

Cars and parking: We believe traffic should be restricted to a sensible level, after all shops existed before the car, we should not be attempting to recreate out of town shopping

centres in our high streets. We want to create real communities with shops, services and pubs all co-existing. I believe high streets should have restricted access for shop owners and shoppers have a drop and shop facility where they can park for 20mins etc., where possible we should promote walking and cycling to and in our high streets, with proper secure places to leave bicycles.

Threats to small shops

Too high rents, they can't negotiate with landlords like the big chains. Rents always go up, as soon as a shop or an area draws in crowds, the rents go up, so there is little incentive for shop owners. Working hours now are very long, they are now expected to be open 7 days a week. Property speculating has been very damaging to the small retail shop, driving up rents.

Rent reviews should also be able to go down as well as up. We are now in a situation where rent can ONLY go up and shopkeepers are paying disproportionate rent and having to pay their rent far too long in advance. Rents shouldn't be linked property values either.

Visitors to the UK increasingly remark on its identikit streets

Its important for London and the UK, that its high streets be vibrant and divers. The way things are, our communities will disappear, our high streets all homogenised and London will loose its position as a place to visit too.

Many thanks for the opportunity to express our opinion on the subject. It is difficult to cover all the possible topics in this short forum but if you would like us to contribute further we would be happy to be involved.

SSLC015-(Public)
[Handwritten Letter]

Dear Ms Jones

Review of Measures Designed to Support London's Local and Neighbourhood Shops

ACS (the Association of Convenience Stores) represents over 33,500 local shops in the UK and many thousand in London. We welcome the opportunity to submit views to this important Inquiry and beyond our initial views would be happy to provide whatever specific help we can in formulating policy.

We have made brief comments on the questions asked and enclose some further papers on the issues that we hope will help you to formulate policy.

1. What pressures do small shops and neighbourhood and local shopping centres face e.g. threats to economic viability, changes in shopping patterns, competition?

Shops in the grocery sector have experienced the economic downturn differently to other parts of the high street. Sales have generally held up well with many retailers maintaining or increasing sales in the period. One explanation may be a shift towards a more cash based food shopping pattern as people seek to manage their money. Invariably any increase in sales has been offset by declining retail margins.

Furthermore retailers in our sector have not been wholly isolated - the credit crunch has led to problems securing finance and increased costs (especially overdrafts). This has led to retailers losing supplies of key products and reducing investment in their business.

The relative insulation that the convenience industry has had from the effects of the downturn should not obscure the long term decline in convenience stores. Taking a longer term view the industry has seen over 4871 independent convenience stores exit the market in the past ten years. The causes of this decline are complicated and include a range of regulatory and business pressures; within these we would highlight the pressures of consolidation in the grocery market and the aggressive entry of the major multiple grocers into small format retailing.

ACS was a main party to the Competition Commission Inquiry and set out clearly the implications of the dominance of the major multiple grocers (see ACS submission enclosed with this letter). ACS supports the Commission's Conclusion and recommendation for a Grocery Ombudsman and strengthened code of practice.

Retailers also face wider regulatory and financial burdens, for example:

- significant increases in the cost of employing staff including the national minimum wage, holiday entitlements and national insurance increases.
- the 2010 revaluation has led to big rates bill increases for many retailers, the thresholds for relief are generally too low to assist London retailers.
- licensing and planning regulations have imposed bureaucracy and costs, some of which can be avoided without compromising a strong responsibility policies.

2. What are the advantages of local centres that provide convenient access to goods and services that are needed on a day-to-day basis?

It is clear that local shopping options are popular with all parts of the community and for some social groups are a vital lifeline. Local shops make it

possible for people to live independent lives for longer, they also provide a focal point for social interaction and a centre to the local community even in highly urbanized areas.

ACS commissioned an academic literature review from the University of Lancaster in 2008 which sets out the existing understanding of the economic and social role of the local shop. Copy enclosed.

3. How effective the planning system is in supporting small shops in local high street and where has it failed in recent years?

Town centre first planning policy has been vital in stopping the decline of major town centres that was caused by the out-of-town shopping explosion of the mid-1980s. The policy has made it harder for new build supermarkets and out of town retail parks to obtain planning approval and consequently prerecession figures should healthy growth in the proportion of new retail development that was to be located in-centre at the expense of out-of centre growth.

Where the policy has worked it has served to prevent the creation or limit the size of new large format retail developments that take excessive local spend and thereby threaten the viability of existing retail centres. The need test effectively applied to development control has been a key feature of policy success in this regard. ACS supports its retention and believes that by removing it Government is weakening the policy and increasing the risk that harmful developments will get through the system. If Government fails to reconsider on this it is incumbent on authorities and the Assembly through the London Plan to set out a clear framework for making development control decisions that takes proper account of likely harmful effects.

That success was limited however in that it still meant that only 40% of proposed floor space in the pipeline was in centre leaving the majority still proposed out of centre. The impact of recession threatens this development, as investment in centers is far more costly and can be curtailed by lack of confidence.¹

However there are two major concerns arising concerning town centre first planning policy.

o Firstly the rate of new supermarket development remains dramatic in the 5 years from 2001 to 2006 the rate of new supermarket development was 2 a week.²

o Secondly town centre first planning policy has proved extremely ineffective in scrutinizing the effect of extensions to existing stores. This has been the engine room of the continuing growth in the amount of retail floor space located out of town in recent years.

Given the relative maturity of the grocery sector in terms of overall growth (the trend has not exceeded 3% in the past decade), the dramatic increase in floor space in major supermarkets has fuelled primarily a consolidation of market share with the biggest 4 companies seeing significant increases in their dominance of the market.

Beyond the specific issues arising from development control under PPS6, it is ACS' view that planning tools for promoting healthy and diverse town centres have been rarely used and of limited beneficial effect. The question for further consideration is whether the tools are appropriate and under employed or whether new tools should be pursued.

Generally speaking the Local Development Frameworks tend to be unfit for purpose in managing retail in local areas. There are two key challenges:

- o the first is about data the extent of the information available to Councils to help them to make judgments about existing and future provisions is limited.**

- the second is about skills and expertise, the extent of retail specialism available to councils without recourse to the private consultancy sector is limited and therefore there are barriers to effective plan making.**

The success of PPS6 and a small shops strategy in London relies heavily on putting in place effective forward plans. This is the area where the London Plan and the Assembly can be most productive in promoting and defending local shops place in a the retail mix.

4. What are London local authorities doing to support small shops and neighbourhood and local shopping centres through the planning system, Development Plan Documents, or proposals under the Sustainable Communities Act?

ACS does not have extensive knowledge of borough by borough approached the issues under consideration. However two examples are of note:

- o The London Borough of Kensington and Chelsea deserves special mention for their High Streets Commission. When published it was the first and most extensive plan for increasing the health and diversity of the retail provision within the Borough.**

- o Proposals from the Borough of Islington under the Sustainable Communities Act calling for protection for neighbourhood shopping centres especially making harm of these centres a material consideration in planning decisions is a most welcome suggestion.**

5. What, if any, progress has been made in relation to planning and related areas following the recommendations made by a number of bodies over the past years?2 (e.g. Parliamentary Small Shops Group in 2005, New Economics Foundation -Clone Town Britain, Competition Commission Inquiry into the UK Groceries Market, 2008)

Progress has been limited in this area. The continuing uncertainty over national planning policy and the conflicting messages about the importance of high streets and the need to free up planning restrictions to allow for investment have made it hard for councils to put in place effective long term plans.

The onset of recession and the slowdown in retail investment has made the supermarkets and associated developers even more powerful and we are very concerned that this period will be used to push through planning applications for large format grocery stores that will ultimately harm the objective of centre focused diverse retail provision.

6. How can the Mayor's commitment to help protect the high street best be implemented through London Plan and other policies?

There is a key role for London to play in setting its own policy vision that looks to the long term interests of the communities in London. This vision set down in the London Plan would be the best protection against unsustainable large format

development.

The Plan should make clear the London specific criteria that will be applied to decisions on where new retail development should be located and the form it should take. There should be clear and quantifiable measures of where economic impacts could be beneficial or harmful. This framework lacking from national policy will make it possible for London Boroughs to make the right decisions when faced with the tough choices on new retail developments.

Footnotes

1 British Council of Shopping Centres

2 Competition Commission Working Paper on retail Competition (para 17)

SSLC017-(Public)

(Handwritten letter)

SSLC018-(public/Tescopoly)

Following the meeting of the Select Committee on 11.5.09.

Planning Policy Statement 6.

Before commenting on the document itself there are three main issues which appear to be augmenting the problems.

Whilst visiting many Council Planning Departments I have found a frustrated and demoralised attitude in most of the Policy Teams. The continual demands for alteration or re-write of the LDF would appear to be causing those problems. They also talk about the continual 'interference' of 'stakeholders'. When questioned its not the local interests that they are referring to it's the PR representatives being sent round by the developers and large supermarket chains. This is leading to distinct influence on the LDF document before they are even produced in draft form for public consumption. Most of these planners will tell you that the new raft of the LDF is not only complicated but also that its form (being in many separate and unconnected documents) is making third party understanding and comment very difficult.

2. In PPS 1 the Government gave the community the right to comment and be involved but this is proving very difficult indeed. I have spent the last 14 years fighting applications and more seriously over the past 4 years dealing with 75 Tesco superstore applications on behalf of the local community. I think this would equip me to understand the documents, certainly to a much larger extent than the man in the street. However although my local group have responded to the consultations on each of the documents as they are issued it really doesn't inform in the way that being able to gain a reference did in the previous UDP. The fact that it was one document (only really supplemented by the Local or London Plan) meant you could find what you needed in one cover easily indexed.

You could not say the same for the LDF. On all documents so far there is no implementation, so your judgement is limited by the fact that there is no way of knowing how it will be enabled. When we raise the subject of implementation we are told this will follow. The indexing is lousy. Planning speak abounds. Applications are coming and going on site specifics agreed or changed behind our backs in negotiations with Tesco and the like for months if not years before the submission is made. This is not 'community involvement' 'at the earliest possible point' or 'at a point where it can make a material difference' as directed by PPS 1. It would appear that the LDF is going the same way. Why a superstore operator gets 'stakeholder' recognition when it doesn't even have a store in the area we fail to understand but apparently it does. In our own case we are so saturated with Tesco space throughout Hillingdon you could not believe they would still be looking for sites but they are.

3. The other major problem is that the best of the planners were hived off into the Policy Teams. They took with them all the local knowledge and the experience. We are left with vastly understaffed departments, planners with little experience in positions they are not capable of filling, often temporary contracted staff from Australia who are from a very different cultural background, have a strange view of history and absolutely no local knowledge at all. They are also all going to have

returned home before the consequences of their inappropriate decisions are evident.

Our feeling is that there is plenty of legislation already and that problems could be sorted by giving the departments back their experienced staff on the day-to-day planning issues. Implementing the policies, which already exist and investigating submissions and penalising for untrue and intentionally misleading data could help enormously.

The lack of a historic understanding of local planning in the present staff means that catchments previously used to justify one supermarket are reused to justify yet another application often by the same operator. In the West Country right now there are four applications by Tesco with totally overlapping catchments to justify the increased retail space and most of the catchment was used to justify the existing Taunton application in the first place.

Now surely even the man in the street is capable of understanding the logical argument that the occupants of these catchments cannot possibly shop in all the stores every week.

The Needs test has been no deterrent to getting stores agreed. (Accept in the rare case where a local group have been able to prove the figures submitted are wrong.) Tesco have managed to build over 200 new stores this year and are going ahead on those they won permission for this year also on very warped data submissions. There just isn't the staff in the departments to spend time investigating these application submissions nor the inclination to do so. Local Major Applications in my area are having their submission documents farmed out to a company in Birmingham for validation. Where exactly is the logic or local knowledge involved in that judgement?

Those supporting the removal of the needs test obviously have a vested interest in removing any measure which could restrict them. In this case they have been left disappointed in cases where they have been caught out lying to get around the restriction. Surely the fact that the test has worked and if investigated correctly can protect the community from inappropriate development is exactly what it was designed to do. Why remove it because in a few cases they have been held to account by it? Will the same names be requesting the removal of other measures that local communities manage to use?

Many Local Authorities resent the 'intrusion' of community representative's involvement. It costs time to involve the community. It costs more time to educate those representatives to enable them to understand the arguments and issues. Enabling that involvement is part of the requirement yet few are willing to say explain the air quality argument or how a trip rate relates to real car counts. Most Departments just don't have the time or money to do so.

This has led to procedural faults. If you notify in a paper not well circulated you will get fewer responses. If you make the notification letter so proscribed and short that it happens to miss vital elements of the application, like the fact that a store is included in an application for a block of flats, then you get less in the way of local action and concern. If you cave in to the bullying of the huge developer you do not incur the costs of appeal. This is a point frequently made by Tesco representatives. It is also the reason for the huge rise in duplicate and twin track applications, designed to complicate and threaten, which could be prevented under the Town and Country Planning Act. Councils are strapped for money and will avoid ongoing costs at every turn. Even when an application has been refused at appeal level the Council will be bullied into registering a 'different application' (permissible within the

three year period) but treat it as 'similar' so that most elements of the application are taken as already resolved at appeal. This happens even when there is new information available.

The local community do not have the right to appeal only the applicant and the local authority have that. That's not an equal playing field to start with. We find very few requests for call ins from local groups are responded to without Council backing. We are told we have the right to Judicial Review, but even when you have a really good case the Legal Aid Board won't take the case. So that option is also not really available it's just a sop to the public. Vital information on applications is not being given by Councils when they do 'consult'. The Brighton London Road SPD fails to identify the amount of retail (or superstore) space it entails yet it quantifies the new office space involved. The size of the retail element dictates the size of the traffic problems involved in the development so are crucial. If you are not being told the size of what you are being asked to consult on are you being consulted at all? Tesco's door to door leaflets never have the size of the store or the traffic generations quantified in their editorial. The public have problems visualising 7,000 sqm and are used to square feet anyway. The difference between an Express store which generates 200 cars per hour and a superstore at 7,000 square metres which can easily generate 800 cars in and 800 out in an hour on a Thursday morning, is fundamentally different. It treats the public as idiots and makes a tick box exercise of the SCI.

Tesco hold exhibitions where they don't even take names and addresses of those who attend and yet five months down the line there is suddenly data produced in their SCI submission giving percentages of local residents who agreed with and want the store! How is that permitted? It is on a regular basis.

At a previous meeting with DCLG we were promised some tightening up and some real firm guidelines for implementation on the new PPS6 This re-write is not a tightening up of anything. It is a charter for big business just as its title suggests 'Planning for prosperous Economies instead of Planning for Town Centres. The two are sometimes not complementary. Its essence used to be about sustainability of towns. But that seems to have gone in favour of economics. A sustainable existing economy is to be valued not thrown out on the speculation of what could be produced. We do not see protection measures here. What we do see is repeated exceptions and excuses for getting round the measures suggested. As said at yesterday's meeting it will all be in the implementation.!

That is a major problem too. When we met DCLG representatives we were very surprised at the attitude. There were some wonderful aspirations being voiced and a community rights first attitude. However the real world of planning is not like that. There is a need for retraining, particularly of the under experienced and over taxed planners running the major applications departments. They need to be sent back to their Counties or Boroughs with the same attitude as the DCLG representatives expressed. Its fine having the policies but when they are ignored or dismissed without discussion those policies are of no value what so ever.

From our experience we would suggest that even more change is the last thing that the planners or the communities need. What we need is some certainty in the market and a set of rules, which will last.

We need the new legislation to better reflect the aspirations of the old UDP policies including conditions on change of use, location of high traffic

generators on high PTAL sites, but above all some honesty and investigation of the submissions by local planners with local knowledge and the time and inclination to properly validate the claims of the superstore.

The removal of the needs test will open the floodgates for more superstore development because it will throw the emphasis onto the competition between facias and their ability to enter markets. If a superstore cannot be justified by surplus local need then what we will have is a very obviously disastrous effect on the local retail market. It is not the other superstores who will suffer because they will be able to use their superior buying power to drop their prices. They use aggressive trading policies when they open stores till they drive others out now. (Ruislip Manor Express took 4,000 shopping baskets per week out of the local economy and three food retailers have closed as a result.)

It is always the small independent retailer or the small chains that suffer. They work on minimal margins so they can contend with the big operators and they cannot cope with the further stress of this sort of immoral operating policy. How many ghost towns do we have to have before that is understood? The small retailer makes a long-term commitment to the community. They know the customer by name and know who needs a helping hand. They often sell local produce and crafts and the income they make substantially goes back to the local community. Their employees would rather be full time employees of a small shop that cares than a faceless conglomerate. They notice when someone is absent. They are part of our community using the local schools and health services like us. They are our friends and neighbours. You can't say that for the superstores which are driving them out of business. The small retailer is the glue of our community and cares about it. They provide the variety that makes our high streets a place of interest to walk around. Cloned high streets are not interesting nor good for the local community.

The present policy is also removing vast swathes of land from the employment market. In Yiewsley the Taplin site bought by Tesco in 1994 was occupied by 25 companies and supplied 800 full time jobs to the local employment market. Our youngsters deserve aspirations over and above being a part time shop assistant. The site will now provide 250 part time supermarket jobs (100 of which will transfer from their existing store.) so the equation here is the loss of 800 full time jobs replaced by 150 part time jobs. If this is repeated on all brown field sites the result will be devastating.

The superstores justify many of their new developments on the basis of bringing new jobs to the area. They in fact kill off more jobs than they create in every town they invade. Those jobs they do produce are mostly part time and mostly at minimum wage. This means that the employee has to resort to income support. So in fact every pound of profit the big superstores make is subsidised by the taxpayer. This seems incredible, especially where an overwhelming percentage of the adult population have already signed a petition or written in objection to the planned store but still get it forced on them.

The latest trend we are seeing is the invasion of the village. Having mopped up most of the obvious town centre custom they are now going to villages where only a small store exists (usually a Londis or Co-op) and forcing through a store which is four times the size of the biggest store existing. The catchment by the way will have already been used to justify their nearby superstore. (Harefield and Croxley Green and the Rickmansworth superstore

are a good example.)

Who are the planning rules written for and who is most impacted by them?

The community and this document's total lack of consideration or involvement of their concerns shows exactly who wrote it and for whom it was written. No wonder the superstore operators yesterday were all willing to welcome it.

They must have been cheering all the way home!

PPS 1 gives the communities the right to decide the future shape of their environment. Lord Wolf at an Environmental Law Foundation Meeting said that lack of community involvement was reason enough standing alone for refusal and for Judicial Review.

We are involved in probably twenty major planning applications every year. Of 75 cases we have supported over the past four years the community have won 59. We are so desperately short of funding that we can't support many cases so there needs to be both substantial reasons why the development is inappropriate and a real public outcry before we do get involved.

We accepted a long time ago that we would never get an equal playing field in this equation but please do leave us a chink somewhere. This is a travesty.

We have already proved again and again that the involvement of the community in planning produces better planning outcomes. It's a shame the communities are not listened to and involved more particularly where it matters -the Government will clearly listen to Tesco and the other bullying developers but not to us those it is supposed to be planning for.

The Planning Inspectorate must be able to produce a list of those who have been involved at Rule 6 level. They would have made an incredible commitment in time and brain power to have got that far and would be qualified to understand the issues being investigated. Why not come up with a meeting where you actually ask the people what they think the problems are?

SSLC019-Campaign to Make Camberwell New Road a Local Centre

Dear Ms Beer

For five years I have lobbied intensively for my local parade of shops on Camberwell New Road (225-253), called Clarendon Terrace. I have a detailed knowledge of the planning of Southwark Council, scrutiny of which I believe has wider applicability across London, particularly in the inner city. My partner designs clothes at her atelier on Clarendon Terrace, continuing the tradition of specialists locating at this historic Georgian parade, but has become surrounded by empty shops and warehouse-style operations, as Southwark Council has designated it a "parade of no more than neighbourhood significance". The effect of this designation was that we became surrounded by resident-only parking, have suffered pavement parking problems and our private access road for deliveries is logjammed with residents' cars and minicabs avoiding the local parking permit scheme.

Based on my detailed experience of trading and lobbying intensively for better conditions, I am writing to suggest a comprehensive and cheap solution for reversing the decline in local shopping, and tenanting the many vacant ground floor retail outlets throughout London, even in this recession. The key to this is an acceptance that vibrant local shopping areas such as Lordship Lane cannot thrive or develop without an element of free visitor parking, for as long as the bulk of disposable income still travels by car within inner city London. So there must be a level playing field. Councils must be forced prescriptively to treat small shops and supermarkets in the same way, and to promote the varied retail mix which gives the "sense of discovery" necessary for customers to return repeatedly and recommend an area to friends. It is crucial to understand that, as at Lordship Lane, for local shopping to survive specialists must be encouraged by providing free visitor parking, short-stay. It is also crucial to understand that this visitor parking would not create congestion, as there would not be sufficient spaces for motorists to make dedicated journeys en masse confident of finding a space. These journeys would be passing trade, in contrast to the dedicated car journeys made to supermarkets.

The approach of Southwark Council has become dogmatic. It seeks to impose purist environmental solutions upon historic shopping areas, demanding that they have no visitor parking at all. At the same time, it encourages the further growth of local car ownership, doing nothing to curb the use and growth of mass free parking destinations such as supermarkets, and doing nothing through the rates system to make it more expensive to have private parking space on properties. This distorts the market by giving artificial support to the supermarket drive-in model, and in turn destroys communities as they lose viable local shopping options and aspire to own cars instead. To be clear, a model of shopping in which 80% of people arrive on foot or public transport to local shops is gradually being replaced by one where 80% of people travel by car to shop at supermarkets.

This green puritanism has unfortunately been echoed by some environmental groups, who are afraid of recommending limited visitor parking in order to sustain local shopping, even if this means a growth in supermarket shopping, overwhelmingly by private motorised transport. The result is the main factor in a decline in local shopping so powerful, that this decline would take place irrespective of the massive purchasing power and cartel abuse by supermarket groups.

The green puritanism approach at Southwark Council, shared by the Liberals, Labour and some green groups, is the argument which says "if we can't do everything, we should do nothing", and which rejects the incremental approach to solutions key to tackling climate change at Copenhagen. There is another parallel to the climate change debate, in that the precautionary principle applies. Due to the difficulty of forming habits, a poor understanding of small business needs and an unsympathetic approach from the parking department, all attempts at new mixed developments in the urban area of Camberwell have failed within the last 20 years. This suggests that "once they are gone, they are gone".

Policy 3.c.3. of the London Plan and Planning Policy Statement 6 have been quoted by Southwark Council in support of its decision to completely withdraw visitor parking from local shops. Yet Southwark's policy of protecting local car ownership by packing out the sides of streets with residents cars produces an opposite effect from the intention of Policy 3C3 and PPS6. These were meant to encourage cycling and walking, and decrease supermarket shopping.

Finally, the decline of independent shops in inner city areas has the following harmful effects, directly caused by Southwark Council's strategy of maximising local car ownership:

- removing the cheap rent commercial locations which have always nurtured entrepreneurs in urban areas
- creating additional barriers to entry for ethnic minority entrepreneurs, disproportionately represented in Camberwell and wider Southwark
- causing increased congestion and pollution by bolstering a culture of car ownership and supermarket shopping throughout Southwark, contrary to the DEFRA Food Strategy
- starving deprived urban areas of the regenerative effect of visitor driver passing trade, creating sink communities
- running the risk that designated centres themselves will fail as more people choose to drive outside the area or to supermarkets, for their goods
- damaging the prospect of an alternative supply chain developing between smallholders in town and country
- atomising communities, as they lose their shops, and potential economic opportunities from link-ups between local commuters who form the cream of the UK's knowledge economy
- inequity, as the majority of households in Camberwell do not own cars but have their local shops and streetscape degraded by a wealthy minority of car owners, as punishment for making the green choice
- an over-reliance on chains and supermarkets for comparison goods shopping, who are less likely to source or manufacture locally
- achieving the opposite of what PPS6 intends, by increasing supermarket shopping and causing local shops to decline
- failing to take account that most visitors to specialist shopping parades by car do so as part of other journeys, whereas visits to supermarkets are dedicated journeys
- a lower transference to rail as more residents "get the most out of" their car within the inner city, as a car owner's expenses are mostly annual

The principal difficulty in getting the Council to acknowledge this lies in the fact that a majority of senior officers, councillors and other decision makers own cars and park them on the road, and drive to the supermarket weekly. This includes the Head of Transport at Southwark Council, and the senior parking officers and managers. This is a conflict of interest more serious than a shareholding in a developer with a planning application, yet the CEO of Southwark Council has rejected suggestions that planners and councillors should have to declare their interest in car ownership when authoring or approving transport-related documents.

SSLC020-Sidcup High Street Promotions Group

The Sidcup High Street Promotions Group sent information relating to our own town centre who demise can be put down to two factors - lack of parking and the local councils refusal to take enforcement action against Morrisons. A special planning consent was approved that the store would only sell food products. There are currently around twenty four empty shops either up for sale or to rent in our high street and whilst our council are strong on words and reports nothing tangible happens.

SSLC021- (Public) "...I have a shop in Crown Street, Acton"

Small shops need AFFORDABLE rent and rates. This has to be the first priority. Too many of us are being hounded out by escalating rents that eventually no one will be able to afford them. Parking is another huge factor. We don't need parking attendants hovering waiting to slap a ticket on a car. Unfortunately there are a lot of older people who are dependant on a car to get about. There is also the safety factor. A lot of people feel vulnerable, so like it or not, until law abiding people are able to walk about feeling safe cars are needed.

The groups that are promoting spend local are great and I feel a lot of people will support this if they realise what is at stake.

I have a shop in Crown Street, Acton. This was once a thriving shopping area with a great community feel until the higher ups decided they no longer wanted the market, it wasn't posh enough. This destroyed the heart of Acton. The people were cast aside and our views didn't matter. I wonder how many people remember what is like to go shopping and say 'hello' to people and have a friendly chat. A lot of people received help and enjoyed a joke or two. We didn't get half the people we have today on anti depressants and afraid to go out. LIFE was so much nicer.

It seems to me we have moved into an era where everything revolves around what money can be made out of the slightest little thing. People need to be able to speak to people in their everyday jobs.

SSLC022-Babye

Hi there

I run my own business – a maternity and baby boutique business called 'babye' I have a shop in Ealing and a newly opened shop in Chiswick and also an online shop www.babye.co.uk

I absolutely love what I do and am very much part of the community – not only providing beautiful clothes and gifts but we also provide information for new mums and parents and have helped many mums along the way. However, it is only because I am passionate about what I do that I continue to do it – I am sure that a lot of small shops have just given up.

I think it is so concerning how so many businesses have been lost over the last few months – in Ealing, we are seeing a high rate of closures but we are lucky that there are developers who want to invest in our area. Ealing Council seems to be sympathetic and has just launched a 'Spend Local' campaign whereby shops and local businesses list special offers on special website – I think schemes like this are great. I am a keen supporter of the local Ealing business community and volunteer myself as a Director of the Ealing BID (Business Improvement District company) where we are trying to implement local regeneration programmes

There are key things which could be done to help small shops like myself, my initial thoughts would be:

Lower the multiplier rate for business rates especially with the new 2010 rating coming into effect soon. This was based on rentals in April 2008 way before the economic downturn. This does not reflect the true state of the rental properties in 2008 and by putting the rates up yet again, so many more businesses will simply go bust

Encourage local 'stop and shop' free parking near local shops or first hour free in bigger car parks

Enforce planning regulations to those retailers who take advantage of empty shop short leases and legally make them presentable on the high street including their signage

Introduce more powers to local councils to control what kinds of shops and businesses are allowed to open on the high street

Give incentives to local landlords to allow temporary use of empty shops for local artists to use as galleries thereby keeping the high streets vibrant rather than looking like ghost towns

Looking at ways where local shops can save money – utilities, refuse collection etc

SSLC023-WiZZBiKE

Hi - I own WiZZBiKE, which has a double shop and repair centre in the High Street in Brentford, TW8.

We suffer a little less than some, because we are a destination shop - but the footfall is very low in the High Street and it's quite obvious to see why.

First about 1:4 shops are closed. A key shop closed the other day, after the council tried to put up their rent 40% on a new lease and they just closed up. Another across the road, went bankrupt after the lady who started a gift shop could not afford an exceptionally high rent (much higher than others in the High Street). We've lost another 'browsing' shop, and the owner lost her home when the council persued her for rent. We now have another empty shop.

Within a very small area, there are three betting shops, six hair shops/beauty salons, five cafes (there were 7 but two went bust). In our immediate area there's 7 closed shops.

I find it extraordinary that the policy seems so unimaginative: the three or four remaining shops where people might want to browse, are completely isolated. It would be so simple to encourage a range of shops so there are a dozen or so, across a range of types, where people can wander around the High Street and browse. If you want to see how much a disaster this High Street is for current traders, just stand in the road around Christmas. It's completely empty. The first year we traded, we sold 1/4 of that we expected and it was May before we sold the stock through.

It's not rocket science to plan a mixed development of shops, where each provides customers for the others. The savings in social cohesion must make it worthwhile.

This is the end of my rant. Will anything happen? I will be moving my business elsewhere if things don't change in the next couple of years when my lease is up for renewal. In under three years, we've taken on 20 full and part time people, have transformed 2500 sq ft of derelict space and brought thousands of people into Brentford - not many people are in the position we're in to invest in new and interesting businesses. We won't stay in an environment where shops are falling like flies around us, not because of the recession, but because of policy.

Regards,

Managing Director
WiZZBiKE

SSLC024-(Public)

Although I'm no longer a small retailer.... retail shops have been in my family for generations....so they are really in my blood! Consequently, wherever possible...I shop locally (Chiswick / Brentford) and in their independent shops.

But this year has been very tough for all.... and we've all had to cut-back on our personal expenditure... which has obviously affected all retail outlets....however..... it appears from my conversations with the local small shopkeepers that the landlords are living and working in a parallel universe and regardless of the obvious downturn in the retail market are actually putting up their rents.

How can they be allowed to do this? Who monitors or 'polices' this sector of the market? If anything they should be reducing rents to encourage and help keep these small shops afloat.

Is this really logical.....trying to put up the rent which prices out the majority....to then have shops lying empty?

It's an absolute bl****dy disgrace and is happening on every High Street.

The Mayor should start reacting NOW....not next year....or after the next election. We've been watching this catastrophe unfolding over at least the past 12 years under this Government and I'm just so worried that it's already too late for most small shopkeepers...

SSLC025-London Borough of Hillingdon

Dear Ms Jones

Further to your recent request for information on how the planning system can support London's smaller shops, please find responses to your questions below.

1. What pressures do small shops and neighbourhood and local shopping centres face e.g. threats to economic viability, changes in shopping patterns, competition?

- Competition from supermarkets and retail warehouses through their:
 - o Mix of goods and product ranges
 - o Economies of scale - cheaper products
 - o Promotion of basic saver items
 - o Extended opening hours
 - o Free car parking
 - o Ease of access
- Food retailing especially has shifted from the parade to the superstore with the result that many specialist stores no longer exist.
- Trend for traditional A1 retailing being replaced with service based retailing (e.g. hairdressers, dry cleaners, rental shops).
- Shift away from traditional A1 shops to a service orientated provision (e.g. coffee and sandwich shops, beauticians, restaurants and hot food takeaways) as market forces continue to respond to a cash-rich-time-poor culture.
- Local shops are particularly susceptible to closure and pressure for change of use. For some local shopping areas the closure of just one essential shop may be so significant as to precipitate the closure of other shops and ultimately the demise of the centre.

2. What are the advantages of local centres that provide convenient access to goods and services that are needed on a day-to-day basis?

- Enhanced quality of life for those without access to a car, including people with disabilities, the elderly and disadvantaged.
- Perform an important role in encouraging employment, entrepreneurship and innovation.
- Provision of specialist goods and services.
- Choice for customers.
- Social contact.

3. How effective the planning system is in supporting small shops in local high street and where has it failed in recent years?

- The planning system has a key role in facilitating and promoting sustainable and inclusive patterns of development.
- PPS 6: Planning for Town Centres ODPM (2005) encourages local planning authorities to plan positively for the growth of existing centres.
- Whilst small parades of shops of purely neighbourhood significance are not regarded as centres for purposes of PPS6, local authorities are required, where appropriate, to seek to protect existing facilities which provide for people's day-to-day needs and seek to remedy deficiencies in local shopping and other facilities to help address social exclusion. This should include assessing where deficiencies exist in the provision of local convenience shopping and other facilities which serve people's day-to-day needs and identifying opportunities to remedy any deficiencies in provision.
- It is not the role of the planning system to restrict competition, preserve existing commercial interests or to prevent innovation.

4. What are London local authorities doing to support small shops and neighbourhood and local shopping centres through the planning system, Development Plan Documents, or proposals under the Sustainable Communities Act?

UDP

- Policy seeks to maintain at least 70% of the primary area frontage in Class A1 use, 50% of the secondary frontage, and generally to avoid concentrations of service uses in both primary and secondary areas. Policy also seeks to prevent avoidable interruptions to the frontage by limiting the length of continuous frontage in nonretail use.
- The UDP seeks to ensure that all residential areas are within half a mile of at least five essential shop uses. Residential areas which are not within 800m of at least five essential shop uses are defined as being deficient in essential shop uses. The plan seeks to protect vulnerable parades and corner shops which have a particularly important role for the local community and to provide opportunities for the establishment of new essential shop uses in Class A1 premises.
- Policy seeks to retain a sufficient range and choice of essential shop uses appropriate to the size of the parade and its function in the shopping hierarchy whilst ensuring that residential areas are not deficient in essential uses.
- “Essential Shops” are a chemist, a post office counter, grocer, baker, butcher, greengrocer and a newsagent. The UDP considers that there should be no less than three essential shop uses in small parades and a choice of essential shops in large parades and local centres.
- Policy establishes the development control criteria for changes of use of Class A1 shops including safeguarding the amenities of shopping areas and maintaining highway safety.

LDF Background Technical Report: Town Centres and Retail Study (2006)

- This study provides a retail capacity and needs assessments of the Borough's town centres and makes recommendations for the Local Development Framework. It includes a number of smaller centres: five ‘minor centres’ and seven ‘local centres’.

LDF Background Technical Report: Local Parades (September 2006)

- This study provides the background and current policy context for parade designations. It includes the results of the 2006 survey of Hillingdon's parades and makes recommendations for future policy development, environmental improvements and the production of a borough wide retail strategy.

5. What, if any, progress has been made in relation to planning and related areas following the recommendations made by a number of bodies over the past years? (e.g. Parliamentary Small Shops Group in 2005, New Economics Foundation -Clone Town Britain, Competition Commission Inquiry into the UK Groceries Market, 2008)

- The combined change of the retail offer and consumer preferences has raised concern as to the future of independent small shops. The All Parliamentary Small Shops Group report ‘High Street Britain: 2015’ (2006) raised the concern that small independent retailers may have completely disappeared by 2015, with newsagents, convenience stores, independent petrol stations and grocers the most likely candidates to be affected by the big four supermarkets (Tesco, AsdaWalmart, Sainsburys and Morrisons). In the grocery sector despite a 5% annual growth in the convenience market, non-affiliated independent convenience stores see a reduction in sales of 5% annually (National Federation of Retail Newsagents 2006).

6. How can the Mayor's commitment to help protect the high street best be implemented through London Plan and other policies?

No specific comments.

7. What outstanding actions and opportunities are in order to support and to help small independent retailers in London and facilitate ongoing support?

No specific comments.

I hope these comments assist in your review of measures to support local shops.

SSLC026-(Public)

I have a small retail business in Chiswick London W4. I find it totally unacceptable that in a time when businesses are failing and banks are being bailed out by the government that we have suffered a 5% rate increase this year followed by another inflationary increase next year and the revaluation process by the VOA which is adding approximately 25% to my monthly rates bill. We have suffered with a lower foot fall, reduction in our margins in order to offer keener pricing and higher prices from suppliers. It seems that there is a complete lack of interest in supporting small British owned retailers who are also trying to support British manufacturing.

SSLC027-(Public)

Dear Sirs,

Here in Ealing we have a problem. Our Local vibrant (1200 jobs our data not the Council's) shopping street is to be surrounded by a CPZ. While the council may make provisions for stop and shop bays and for longer term pay and display bays it is very very reluctant to consider some provision for worker parking. One councillor even said the bakers who come very early in the morning and finish at around midday should come by cab. There is no car park in this road of shops so for some workers who have to come by car this might mean they give up. There are operational vehicle licences at £250 but their issue is discretionary and not given to workers who are effectively commuting. Working mums are particularly affected as they often have to move quickly from work to school to collect young children .

Basically there is a conflict between a money making scheme and businesses both competing for the punters pound. The council don't want to adapt a scheme that is making them money. But it is the punters us who suffer in the end with poorer services. An excellent example is how we nearly lost a dosset box drug delivery scheme from our local pharmacy...the council didn't care .it was rescued by our local resident's association.

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Dear Sirs,

Forgot to mention that we have lost job opportunities as well as service industries here in Ealing. How is this? Any industrial site seems to be fair game for developers wishing to build houses.

It is an offer the owner of an industrial estate, workshops or factory can't seem to refuse and the planning committee go along with it. I was first alerted to this trend when just in one week 3 of my customers told me their jobs were being transferred to Reading from Ealing, Acton and Shepherds Bush. They were quite upset because the location of these new office estates were green field sites so far away from public transport that they felt (excuse the pun) driven to use their cars on a daily basis. They had been able to use cycles or public transport before. We lost Cambridge Yard in Ealing. It had a joinery company, a timber yard, a welder, a fixings retailer, a furniture maker, etc etc. Now all gone and just a boarded up site remains. I feel as a resident let down by a planning system that is developer lead. It seems to me that we should now be looking at sustainable communities with local jobs, local services and much less reliance on transport. Councils rushing to help developers to build thousands of flats period is not responsible. Sadly money talks.

SSLC028-T Parker & Sons, Bakers
London Assembly Planning Committee

In response to your committee's request for small businesses to send in their views on how their business or local neighbourhood has changed or struggled, and what support is needed, I write from my point of view from 39 years as a family baker in Northfields, Ealing. Apart from the obvious decimation of small shops and businesses by the supermarkets, one of the biggest problems facing the remaining small neighbourhood shops is the availability of car parking as we need to serve more than those customers who live around the corner.

The parking issue is two-fold; 1. Customer parking and 2. Business employee parking.

Businesses will not survive if customers cannot get near enough to them. In the past, customers have been discouraged from using Northfield shops because a £40 parking ticket made whatever purchase they made far too expensive. The fault lies with the lack of provision of customer parking facilities. In this particular locality, we have 30 minute Stop and Shop along some of the street but no public car park whatsoever. There is still more scope to create more Stop and Shop bays where the adjacent roads meet Northfield Avenue, along the flank walls of the shops themselves which even the more vociferous residents cannot claim as "theirs". Some businesses will of course, require longer parking facilities for their customers. These are the hairdressers, restaurants, opticians, dentists, doctors and the like that are crying out for better provision to protect themselves and their customers.

The second issue is even more contentious as it involves the creep of the Controlled Parking Zone cancer. Each time a CPZ either comes into being or is extended, those people, whoever they are, who have been using parking space in the new zone, have to find another space outside the zone. This causes congestion around the outside of the zone and residents there are then forced to request that their road is included in order that they can park outside their own houses. As the available non-zone space diminishes, so the congestion intensifies while there are numerous empty streets within the zone. So far, so good and I am not telling you anything you did not know before.

However, notwithstanding that Ealing Council has the most to gain from these zones, I have to agree with the basic tenets of CPZ's and the need to preserve road-space for local people. But this is where I think the interpretation of "local people" has and will be the cause of problems. The Council Ward Forums and indeed the residents associations, are run by residents for their own good. There are no votes in business-rate payers but in order to succeed, businesses should and must be included in that group, "local people". I refer back to the previous paragraph where I mentioned "those people, whoever they are, who have been using parking space". Some, but not all of these people are local employees who have little choice than to come to work by motor car because they either start work before public transport is up and running, or may need their cars for banking, collecting/delivering supplies or visiting other people in the course of their work. Those who should really be excluded from parking zones are those who use Ealing as a car park for our many stations and the many students who could use public transport but will not.

I have appealed to Ealing Council for recognition of shop and business employees (and owners) and may well include others such as teachers and health professionals etc., as an integral part of the local community and be afforded the same consideration as residents. This will be an important step in preserving the nature of local shopping areas and community. In the current CPZ's, businesses 'may' be permitted a business vehicle permit but at a cost of ten times that of the same space as a resident's permit. Despite the councils denial, business rates play a large part in the finances of the borough and a little acknowledgment and some help to assist staying in business could have enormous benefits to the whole community. There is currently no consideration for those of us who come to work at 4.00 am or need our cars for various errands during the day.

If there is anything the Mayor or your committee can do to address this particular problem, then it may go some way to preventing further closures.

SSLC029-[Public]

There are huge issues over parking outside shops so people can load and unload goods for delivery and goods bought. I understand about traffic flow. Churchfield road in acton has been plagued by traffic wardens and cameras. I live very near here and it has taken years to improve this area and the long standing business's have been much affected. They are tired and we do not want them to close. Please support them as they have worked hard to maintain their shops. We need them and you need to allow them to carry on. We must keep the high streets alive.

SSLC030-[Public]

Dear Alexandra Beer,

Near my home, our local restaurant hub is Cricklewood Broadway, not near a Tube but it is a main road, A5. Cricklewood train station does not even have a taxi bay outside, nor even a station building - it's a disgrace! Unfortunately, we have 3 council boundaries.

Parking near the A5 is restricted differently in each of them:

Camden has sensible restrictions where parking controls end at 6.30pm, Brent has residents bays controlled till 9 or 10 pm, and Pay & Display bays also till 9 pm but worst of all, 1 hour maximum - making it impossible to visit any restaurants before 8 pm - except perhaps for collecting a take-away! Consequently, we have swathes of empty streets and restaurants! What an idiotic decision!

Worst of all is Barnet - where even the visitors' bays are residents only after 5.30 making it impossible for customers to come to visit local businesses unless they live in walking distance - not a viable proposition! Even though I live walking distance while I'm fit and healthy - we may want to have dinner with friends from other areas - and the solution is simply to go and meet where we can all park - madness due to bad planning and anti-car concepts which are simply unrealistic and will ruin London and its restaurants. The solution has to be for all boroughs to be forced to provide adequate parking facilities. Instead of demolishing 1960's multistorey car parks which were constructed for Minis, we need new ones for today's "Chelsea Tractors" to get them off the road, and the traffic moving - not circling around looking for somewhere to park legally.

Cycle parking is also needed in local shopping areas, as well as proper cyclepaths, making it safer to cycle and encourage people to drive less. However, to simply not provide parking near attractions is foolish and incompetent planning. The borough of Southwark near the Tate Modern/City Hall springs to mind as an example of ruining our townscape by providing no accessibility. The Tube stations are not exactly within "easy" walking distance!

SSLC031-[Public]

Dear Cllr Jones,

I read your article with interest in the Ham & High Express today. I live and work in Hampstead and we, as other town centres, do have our challenges. Some are below:

1. We are experiencing local shops which close down and lay empty for a while. The reason is that rents in Hampstead tend to be high and landlords are not particularly interested in reducing them to attract the right sort of shop.
2. We have about 6 mobile phone shops on the high street and other multiples. We also have tons of estate agents which also take up valuable space and boutiques. This duplication takes up significant space on the high street and we would really like to do something about it to make it more difficult for multiples, mobile phone shops and estate agents to open in Hampstead. I understand that once a shop is designated a retail shop, any business can set up there. I would like to see introduced a stage for planning approval for shops which fall into particular category and where a local community feels that they have enough representation of such shops. This would require primary legislation to give such powers to the local council, but this would help to give residents some control over what shops they want to see on their high street.
3. We have lost our local butchers so that there is no local butchers in Hampstead any longer. I understand that other butchers have looked at properties in Hampstead and because the rents are so high, can't make a butcher's business work. Would the London Assembly consider buying one or two key sites in Hampstead which they can then hold at reasonable rents to attract vital shops like butchers to our area?
4. We feel powerless to change our shopping street because all the properties on the high street are owned by different landlords who don't have an interest in making the street a useful shopping experience. Although that experience would help them in the long run with successful shops which they can then charge higher rents to, they don't see it like that at the moment. Would the London Assembly help us to get these landlords together and give them some incentive to work together to make our shopping area unique?
5. I was part of a local traders association (I am actually a lawyer) who looked into making Hampstead shopping more unique and less like any inner city high street with lots of multiples. We went as far as to invite the ex-Chair of an organisation that owned a high street in a well known London area. He has very good ideas of how to work with the community to make Hampstead more unique. The trouble is he would charge for his services and we did not have the funds to pay for his time. Would the London Assembly give us funds to hire him formally to work with us to these ends?

6. One of the comments was that to make the shopping experience work, parking had to be more available than it is today. Would the London Assembly help the Council to work with us to make this a reality?

7. There are various ideas about using an electric bus to go around Hampstead collecting shoppers and taking them to various parking points. Would the London Assembly give us funding to make this a reality?

8. All the shops in one part of the shopping area is owned by Camden Council but those properties are not well kept. Can the London Assembly help us to do anything about this?

This is probably more than you wanted to hear given your article and I apologise if I have gone off message, but as you have offered, it seemed a shame not to probe the extent of your generosity...

SSLC032-[Public]

Hello

I am responding to your request for views on local high streets.

I live in Golders Green and grew up here also. Over the past 10-15 years, there has been a very marked deterioration in the general ambience of the area. Golders Green road is now full of temporary shops, charity shops and cheap cafes. No new businesses seems to last more than a year and the general consensus from the shop keepers is that the rental is so high, it is only charity shops that can afford to continue as they are subsidised. Recently, Galton Flowers, a high end and beautiful florist, closed down after many years. This was the only shop with any real elegance and appeal, just in terms of its appearance. What we are left with is a run-down and cheap-looking high street with no pride. It is dirty and poorly kept and is deteriorating year by year.

Part of the problem is almost certainly the lack of parking, with such wide-spread restrictions and few pay-and-display spaces that this area would never attract many shoppers. This is set to get even worse as the parking restrictions are going to be enforced in even more local roads next year. There is Brent Cross shopping centre also locally with free- parking, which is far more attractive to shoppers.

I am saddened to watch this area drift into obscurity and depression, but that is certainly where it is heading without a very considerable face-lift. It used to be a pleasure to live here when I was growing up, but this is no longer the case and there is no longer any sense of being in a community who take pride in their surroundings.

SSLC033-London Street Market Walks

I have many times mentioned that I would like to blog on london.gov.uk website about small shops, local markets, etc.

I think you should make space available and allow me to do this.

I know that the blogging I have done about the markets have perhaps not increased booking for my walking tours. But it has increased numbers which turn out and support the ailing street markets.

I would also like to join the committee on small shops and give my input, etc.

Sandra Shevey
London Street Market Walks

SSLC034-Tiddlywinks Ltd

Dear Cllr. Jones,

I have two shops in St. Johns Wood High St. and am suffering by the downturn of business. The landlord wants to increase the rents by 90% rates have gone up and the footfall has fallen.

The goverment did all it could by stopping tourists in the summer by advertising 'swine flu' affecting my turnover by 40%. Were we the only European Country to have the flu or the only one's to advertise it? I can't help thinking it was a ruse to stop the expense scandal escalating.

This High Street was full of inderpendent shops but with the rate and rent increases plus rubbish disposal and the added expense of private security (sadly the bobbie on the beat has vanished) the running costs will overtake the income, and the only shops to survive will be the multiples.

We recently managed to overrule a bicycle docking bay as this would take precious parking bays from the high street of which there are few.

I employ 10 staff and wish to continue doing so, but everything is a battle.

Any suggestions would be welcolm to keep this High Street Special.

SSLC035-[Public]

Richmond Council has increased the business rate on average (as far as I can see) by one third. So many shops have closed and the increase in business rate is often the last straw.

Where is the sense? Close the business and there is NO business rate. Further, anyone considering opening sees all these empty shops and says 'No'. Has Houslow done the same? I ask.

SSLC036-[Public]

The incontinent use of parking controls by local authorities seeking to raise revenue regardless of other considerations is one of the most serious threats to London's shopping streets.

Local authorities claim that stringent controls are necessary and that they do not seek to exploit these for revenue purposes yet time and again the facts demonstrate the opposite to be true. If the current approach is not soon abandoned and if we do not have widespread de-restriction of parking many shopping streets will be destroyed beyond repair.

SSLC037-Violet Hill Studios

Dear Sir

My business is a small complementary Healing Centre situated behind Abbey Road in NW8; this is mainly a residential neighbourhood, and is very much a secondary trading position.

I have just received a Notice of New Rateable Value, which has increased by 77% over the 2005 valuation, and the extra costs will be extremely difficult to absorb. There are already several shops which have been unoccupied for some time, and will now prove to be more difficult to let as a result of the increased overheads.

I should be grateful if you could register my serious concerns. I shall be pleased to supply you with any further information that you may require.

SSLC038-Jenny Ellis Partnership

Can you forward me the details of the information accordingly and how we can get involved in ways to support local shops on the high street, to stop them from becoming corridors of empty shops. I would be most interested to hear what is proposed.

SSLC039-Kilburn Business Association

Dear Alexandra Beer,

You must have noticed the closing down of shops in our neighborhood with alarming regularity.

As chairman of Kilburn Business Association I am in contact with other Business Associations and the picture as you may know is the same in all areas.

Is there something that we can do in order to stop this rapidly growing tide. Could we perhaps discuss this and see if something could be done?

SSLC040-British Retail Consortium (BRC)

Thank you for inviting the BRC to contribute to the London Assembly Planning and Housing Committee's review of how the planning system, and other initiatives, can provide support for London's local and neighbourhood shops.

The BRC has produced two documents this year that address a number of the questions being posed in your review. These documents are:

- Planning Best Practice Guide
- 21st Century High Street

The BRC's Planning Best Practice Guide is a comprehensive guide looking at case studies of good and bad practice across planning in relation to retail development. It demonstrates how retail led development can deliver a number of social and economic benefits.

21st Century High Streets is a report published by the BRC that provides recommendations on securing the long term future of town centre retailing. It looks at a number of elements that make up an effective and vibrant town centre, underpinned by case studies from across the UK..

I have enclosed both these documents in response to your review and hope you will find them useful in addressing some of your areas of concern.

The BRC will also be responding directly to the Mayor's consultation on the London Plan.

SSLC041-[Parliamentary Candidate- Westminster North]- Mark Blackburn

Hello,

Below is a letter I sent to our local paper - as an independent retailer for 25 years I am extremely interested in the plight of the high street.

I am now the Liberal Democrat parliamentary candidate for Westminster North and would like to offer my knowledge and experience in anyway that might be helpful.

Kind regards

Mark Blackburn

--- On Mon, 30/3/09, m.dh.blackburn@talk21.com <m.dh.blackburn@talk21.com> wrote:

From: m.dh.blackburn@talk21.com <m.dh.blackburn@talk21.com>
Subject: Wood & Vale - Keep It Local

Date: Monday, 30 March, 2009, 10:35

(This is going to be rather a long letter, because in this instance as a former retailer I think I really do know what I'm talking about, even if I do say so myself! I'd be delighted to discuss further - and if you are forming any committees/action groups etc, I'd be very keen to help. Mark)

Dear Sir,

I would like to lend my support to your campaign to save our local shops. As an independent retailer myself for many years, it breaks my heart to see the number of empty shops in my local High Street, and unless something changes, it's going to get worse before it gets better.

Local shops are under attack from all sides. Most of their landlords are big institutions, who rely on high rents for their pension portfolios, which is why we have such ridiculously long leases, mostly with upward-only rent reviews. Sales levels may fall, but rents never do, even if foot traffic moves away to the new supermarkets springing up everywhere and new shopping centres like the Westfield.

After the rent, the next biggest expense for small retailers is their rates, and these go up and up because they're assessed on boom-time rent levels, not on current market conditions.

The Council isn't currently helping with its parking policy. I received a ticket recently for sitting in my car on a single yellow line for 2 mins and 38 secs (and 27 threatening texts from the council's debt collectors without ever having received a Notice to Owner, but that's another story) while my wife went into one of the shops to collect something, and retailers are continually telling me that their customers are being scared off and it's impossible to manage deliveries, whatever the Council says to the contrary. We need a more collaborative approach to parking - when I lived in Newcastle a couple of years ago you could have a sensible conversation with a parking attendant and as long as you had good reason to stop and moved on swiftly after your business that was fine. You didn't get a ticket from a spy camera (also pointing into people's flats) weeks after the event.

Landlords, meanwhile, seem happier to let their tenants go bust than charge appropriate rents. They hope one of the multiples will move in and pay a higher rent to set new levels that the independents can't afford.

We can all do something to try and help our local shops:

The Government - Make upward only rent-reviews illegal. Force landlords to set sensible rent levels according to the conditions NOW, not some meaningless historical comparisons assembled during the good times.

The Council - Charge independent retailers affordable rates not exorbitant ones based on past rental levels. Even give them a rates holiday where conditions justify it. And have a common sense parking policy which allows for deliveries and collections. There are rumours that scratch cards are being introduced for those who find pay-by-phone parking difficult. How are these advertised? Where can you buy them?

Landlords - Be sensible about the rent you charge. Do you want your tenant to go bust in a year's time? Do you really want to hold out for the so-called "market rent" if it means your shop stays empty?

Retailers - Don't agree to silly rents which will catch up with you and set a pattern which puts up the rent for all your neighbours. Is a rent-free period or other incentive really going to help you in a year's time?

The public - stop using the big multiples and the supermarkets and support your local independent. Don't complain about the situation on the High Street if you're not going to use it!

The current recession is going to worsen and unless we all act in concert, there won't be a local high street left to save, here or anywhere else.

Mark Blackburn

Liberal Democrat Parliamentary Candidate
Westminster North

SSLC042-Enfield Business & Retailers Association

Attention of Alexandra Beer

The London Assembly

City Hall

The Queen's Walk, London SE1 2AA

Winchmore Hill Retailers Facing Business Rates 'Rent Tax' Crisis

Winchmore Hill Traders wish to make a submission to The London Assembly Planning & Housing Committee, in response to a call from the Committee for information on the problems facing small retailers in London and what support is required, to protect London's high streets and local communities.

About Winchmore Hill

Winchmore Hill is a vibrant residential community, of just under 10,000 households, in the London N21 postcode. It is an attractive place to live, with large areas of green space, good transport links to Central London and good quality housing stock. For more background information about the local area, go to www.n21online.com.

Within Winchmore Hill there are a number of local shopping areas, the largest being along The Broadway, Green Lanes, as well as around Winchmore Hill Green; Vera Avenue in Grange Park; Chaseville Parade to the north of the N21 and the Firs Lane shopping parade to the south of the post code. There is a large Sainsbury's superstore located in Green Lanes, as well as a smaller Sainsbury's supermarket on the Highlands Village residential estate, in close proximity to four local schools. There are now only two butchers within Winchmore Hill and no longer any specialist greengrocers or fishmongers, with the last ones closing within a year of the Sainsbury's opening.

Winchmore Hill has a diverse range of quality restaurants and takeaways, primarily situated on Green Lanes and Winchmore Hill Green, as well as pubs, cafes and coffee shops. The neighbourhood has a number of high end fashion retailers, jewellery and giftware retailers who are able to draw in shoppers from a wider area.

Many of our small retailers and restaurants are family businesses, employing two or even three generations. Shop occupancy has traditionally been high. However, the number of vacant premises in two of the prime

shopping areas (The Broadway and The Green) has grown over the past year and this is a cause for great concern.

Problems Facing Winchmore Hill Retailers

Whilst parking restrictions, the recession and the erosion of business by the national supermarkets and online retailers are major problems, the most urgent problem facing Winchmore Hill Retailers is the Business Rates or possibly a better name would be 'Rent Tax', the massive hikes in business rates faced by many local retailers in 2010. The 2010 revaluation, based on estimated rental values of premises in April 2008, is resulting in an average increase of 76% in business rates for some of our local retailers, although many have found that their business rates are to more than double.

Whilst Winchmore Hill retailers are not alone in facing business rate increases, David Burrowes MP, who is supporting the WHT campaign has discovered that Winchmore Hill is facing the highest increases in business rates in the whole of London.

There is a real danger that the 2010 business rate increase will be the final straw for many local businesses, many of whom have been trading in the area for many years. With turnover down and margins reduced in an effort to compete for business as a result of the recession, the cost of operating a business is rising at an unsustainable rate, which sadly could result in a number shutting up shop. A rise in the number of empty shops along Green Lanes will have a domino effect on the remaining retailers and deter shoppers.

Moreover, the proposed business rate rises will make it harder for new businesses to become established in the vacant premises, unless measures such as 'business rate holidays' and other incentives can be given, as new tenants will have an even higher risk of failing than established businesses. We are keen to attract more retailers to the area to add to the choice for local shoppers, these tend to be more niche and offer goods or services that are not available at the large supermarkets, but unless the Government rethinks its current rating strategy, using rateable values based on 2008 property values, the cost of doing business will not only deter new retailers but will be the last nail in the coffin for many established businesses especially in the current difficult trading conditions.

If, like pubs, business rates were based on profitability rather than rental value, we believe that this would be a much fairer way of determining a realistic valuation. In many cases the rateable value of pubs has reduced over the last 10 years, correctly reflecting the drop in business within the licensing trade.

Here is what some of our local retailers have to say:

“My rateable value has risen by 120%, from £8,800 to £18,750. In the current economic climate, this has got to be wrong”

Paul Gibbins, The Men’s Room

“The rateable value of my two shops has gone up by 106%, the high streets are the life blood of our communities, if businesses begin to close down it will have a severe effect on the whole of the area. Our shopping parades must be assisted to assure their survival and future growth.”

Olly Prigmore, The Brassware Company

“I am just writing to you to confirm my exasperation at the fact that the Government intends to hike my business rates yet again. As I'm sure you are aware the last twelve to eighteen months has been extremely difficult in the property market and it appears that the Government is making it almost impossible for independent shop owners in this difficult climate. There are already empty units in our parade and increases like this will make it very difficult for the existing businesses to survive, let alone flourish”.

Brian Graff, Peter Graff Estate Agents

“I am concerned about the increase in business rates and fear that the business expenditure is soon going to outweigh any benefit of running a business. Other increases have been noted, telephone charges, energy prices, insurance premiums. The increased costs are currently equal to what I currently pay a part time member of staff. I am concerned that I will be forced into a position that I cannot afford to employ someone to assist. This in turn could lead to an increased burden on the state should benefits need to be claimed.”

Zoe Winfield, Rhoobarb (Children’s Clothing)

“Many local businesses have had to re-focus towards more niche markets in order to survive due to the threat from supermarkets and the internet reducing their core business. The increased rates now threaten their survival once more”

Mark Rudling, Town Centre Manager (EBRA – Enfield Business and Retailers Association)

Our local businesses would be prepared to discuss their individual cases in more detail should this be of use to the Committee.

Winchmore Hill Retailers Fighting For Survival

Winchmore Hill Retailers are keen to work together to protect our local businesses but also to help to support the local community. Around 70 local businesses met recently to discuss the problems being faced and are considering a number of measures which can be taken jointly to encourage more people to use local businesses, such as a local loyalty scheme and a joint marketing campaign. However, we are concerned that unless the Government imposes a freeze on business rates the prospects for many of our local businesses will be bleak, adding to the number of business failures and a deterioration in the quality of life for people living in Winchmore Hill.

SSLC043-[Public]

How on earth are we to support our local shops when Tesco are allowed to open in the middle of them, i live in Elm park Havering and use the shops as much as i can. Havering even introduced the Havering card where we receive 10% discount when we use the shops enrolled in the scheme, and then what do they do let Tesco purchase or rent i don't know the old Woolworth store?. It's another hypocritical council policy which has cost money and is now useless as Tesco are cheaper even with the 10% discount, i personally don't use Tesco but speaking to the small shop owners many people now do use it leading to more shops in Elm Park closing down, i believe three since Christmas.

Response to the London Assembly's Review of Measures Designed to Support London's Local and Neighbourhood Shops.

The objective of this note is to make a contribution to question six of your review. We wish to draw your attention to an issue which we feel could be important in protecting the vitality of smaller neighbourhood centres; it is property-related although it is outside the sphere of planning. This issue concerns providing information to small business tenants as they negotiate their leases. It is an issue that the London Assembly could address through the London Plan and other policies.

Since the economic downturn in 1990, which caused a major crisis in the commercial investment and occupational property market in the first part of the 1990s, there has been political pressure from all Central Governments to improve the flexibility of the landlord and tenant relationship. In the 1990s, the combination of long lease lengths, upwards only rent reviews and expensive dispute resolution, caused the Government to call for a voluntary industry Code of Practice for Commercial Leases. It had initially threatened to introduce legislation to outlaw some practices which it thought anti-competitive but was persuaded by the property industry to pursue a voluntary solution. Since then there have been 3 Codes of Practice and the University of Reading has monitored the operation of the first two Codes and the dissemination of the third Code.

The University of Reading monitoring reports show that small business tenants, many of which are retailers, are consistently seen to be at a disadvantage in the leasing process. The Committee's attention is drawn to findings of the reports and some of the related output. In particular, the second University of Reading monitoring report drew attention to the difficulties of small business tenants who wanted to dispose of premises, and therefore their leases, as they were or had become unsuitable for the operation of the business (Crosby et al, 2005). This aspect was the subject of further analysis after the completion of the report (Crosby et al, 2006).

A significant number of new businesses do not survive for the term of a lease but can find it difficult to assign or sublet an unwanted lease due to restrictions on assignment and subletting. Some major landlords have agreed to voluntarily ignore some of the restrictions within leases but this may not influence the behaviour of other landlords. The Committee might consider the role of the London Boroughs as landlords to see if their actions are supportive of the small business tenant and whether they have knowledge of and are adhering to the latest Code of Practice (RICS, 2007). Are the lease terms offered and the subsequent management of the properties conducive to nurturing the small business tenants? Is the objective to maximise the financial return from their property ownership or is it to provide the environment to nurture small business? Are these objectives mutually exclusive or complementary?

It has been suggested that rising rents was the second most important pressure on small retailers in London (GLA 2008). The rent determination process and the transparency in the property market are well worn issues with landlords more likely to have professional support and data knowledge than tenants. This information asymmetry can give landlords advantages in negotiations at the commencement of new leases (Crosby et al, 2005) but also at lease renewal and rent review. A significant number of tenants accept the first rent and terms on offer and some are not aware that they can negotiate. Small business tenants do not always perceive rent as the residual amount they can afford to pay after all expenses and profits have been deducted from income. It can be perceived as a fixed cost along with items such as business rates, with employee reductions being used to reduce costs when the need arises. The upwards only rent review still predominates where there is a review in the lease. This can cause a tenant to pay over the market rent for a number of years beyond the cycle of a normal rent review period, which in the UK is 5 years.

We would also refer you to a further piece of research undertaken by one of the members of the University of Reading team in 2006 (Crosby, 2006). In Australia, all State Governments have legislated on leasing issues for small retail business rather than relying on a voluntary solution. Crosby (2006) examined the Victorian legislation which included the appointment of a small business commissioner (SBC). Although the majority of the SBC's work was tied to supporting and policing the lease legislation, his office also dealt with other issues concerning the welfare of small business. Annual reviews of the work of the office can be accessed at www.sbc.vic.gov.au.

Information transparency could play a vital role in helping informing small business about rental level and appropriate lease terms and the London assembly could play a role in consolidating this information for the benefit of all tenants, including those in small neighbourhood centres.

Neil Crosby
Professor of Real Estate

Cathy Hughes
Lecturer in Estate Management

References:

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Crosby, N, Hughes, C and Murdoch, S (2006) Flexible property leasing and the small business tenant. Journal of Property Research, 23(2), 163-88.

Crosby, N. (2006). An Evaluation of the Policy Implications for the UK of the Approach to Small Business Tenant Legislation in Australia - Main Report. www.rdg.ac.uk/rep/ausleaserpt.pdf.

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RICS (2007) The Code for Leasing Business Premises in England and Wales 2007. RICS: London

SSLC051-London Borough of Southwark

Dear Jenny Jones,

Re: Review of Measures Designed to Support London's Local and Neighbourhood Shops

We welcome the opportunity to provide comments on the London Assembly's review of how the planning system and other initiatives that can provide support for London's local and neighbourhood shops and small independent shops. We understand that the findings will be used to help form the Assembly's contribution to the formation of policy within the draft London Plan.

Through planning policy and business improvement initiatives implemented by the Council, Southwark seeks to protect, support and enhance the network of local and neighbourhood shops in the borough to ensure that people have access to the widest choice of services in their local area.

Southwark acknowledges that the continued attractiveness and viability of local centres and shopping parades depends on the range and critical mass of retail services on offer being maintained. It also depends on maintaining and providing support to retailers which are experiencing difficulty in these current hard economic times.

We have set out our responses to the questions below.

What pressures do small shops and neighbourhood and local shopping centres face e.g. threats to economic viability, changes in shopping patterns, competition?

Southwark's local shopping centres, like many across London, have struggled over the last twenty years or so. Notable exceptions to this include Lordship Lane and Nunhead, where booms in local housing markets have helped sustain local independent shops. The growth of out-of-town shopping, retail parks, development of large supermarkets, increase in car ownership, and consumer preference have all served to undermine these local centres.

Typically, smaller local centres have not been the focus of investment, either public or private. Consequently, trading premises are often in a poor condition and the public realm and overall trading environment is not attractive to customers. Many of Southwark's local shopping centres are losing sufficient diversity of use and provision of amenity to adequately fulfil their potential for providing basic day-to-day provisions. It is quite common for smaller Southwark parades to consist of uses such as bookmakers, hot food takeaways and newsagents, with little else in the way of variety. Competition is intense, particularly amongst hot food takeaways, and there is a high turnover of businesses.

Street markets have also been in decline in Southwark, mirroring a regional and national trend. For the smaller shopping areas that street markets are/ were located in, there has been a significant knock-on effect of loss in vibrancy and footfall.

On a macro-level, the effects being felt by traders in smaller shopping areas can be attributed to:

- Changes in shopping habits
- Growth of car use
- Growth of 'out of town' shopping centres
- Growth of multiple/ chain retailers
- Changing requirements of retailers (often unmet by outdated retail units)
- Changes in working hours and habits of local populations
- Overall increased mobility of population

On a local level, Southwark Council has engaged with traders through initiatives such as Improving Local Retail Environments (ILRE) (see response to question 4 for more details of programme). Traders and business owners/ managers typically identify barriers to trade as:

- Safety and security, in terms of the trading environment as a whole and their individual units/ premises
- High rents and rates
- Effect of vacant units on surrounding shops
- Overall condition of trading environment and public realm
- Parking availability and provision of short-term stay spaces

Looking at available enterprise statistics, Southwark's micro businesses (defined as having 1 to 10 employees) in the retail sector have not grown as much as the rest of the other businesses in Southwark's retail sector. The figures show a growth of 3% for micro businesses compared to 7% for the rest. London, in contrast saw growth of 0.3% for retail micro businesses and 1% for the rest of the sector. (Nomis ABI, 2007).

In 2007, London experienced a 1.2% decline in the number of micro sized retail establishments, while in Southwark there was a 1% decline.

Southwark (7%) has a slightly lower proportion of micro businesses in the retail sector compared to London (9%)

(All figures above sourced from Nomis ABI, 2007)

What are the advantages of local centres that provide convenient access to goods and services that are needed on a day to day basis?

The continued designation, protection and enhancement of local centres in Southwark is a high priority as they provide a much valued and necessary service to the parts of the borough that are more remote from the established town centres. Locating services in local centres, which are well served with public transport and have facilities for pedestrians and cyclists goes a long way towards spreading the benefits of choice and quality in services to the widest range of people.

When appropriately located, shops generate activity on the street, therefore increasing safety. They also reduce the need to travel by providing amenities in close proximity to transport infrastructure, residential development and employment areas.

Where local shopping centres are still providing some essential services (such as a post office) and where there are uses that encourage visitors to stay in the area (such as cafes), there can be a sense of vibrancy, and opportunities for social interaction. In this sense, local shops can provide more than just an opportunity for traders to establish a business.

In Southwark, a recent survey of The Blue demonstrated that the majority of traders view the 'sense of community' as their principal reason for liking the area.

Local shops can provide a focal point for social interaction, increasing the sense of 'community spirit'. Traders can play a valuable role in being the eyes and ears of the local community, by picking up on current issues affecting local people, and looking out for vulnerable members of the community.

If local shops can offer a sufficiently diverse range of goods and services, then such uses can begin to support each other, by providing a strong combined unique offer to customers. In turn, traders can also forge a stronger collective identity which helps to promote the area and attract new customers.

Local shops can encourage less reliance on the car and more journeys made on foot or by bike. In Southwark, economic development officers has worked closely with transport officers to promote target areas within ILRE to local residents, by encouraging them to consider shopping locally.

The future for many smaller local shopping centres is uncertain, but a range of factors may begin to make conditions favourable for trade to pick up:

- Changing consumer preferences and shopping habits, with many consumers either moving away from multiple/ chain stores or at least preferring to mix their shopping choices by visiting multiple/ chain stores and local shops
- Growth of specialist shops
- Renewed interest in shopping locally and supporting independent traders

How effective the planning system is in supporting small shops in local high streets and where has it failed in recent years?

The planning system – through central government, regional and local frameworks – provides a framework to acknowledge and address the importance of small shops for London's communities. The enactment of the Planning and Compulsory Purchase Act (2004) and the introduction of Local Development Frameworks has changed the manner in which local planning authorities plan for new growth.

The introduction of 'spatial' planning has changed the way planning authorities address the retail offer and new provision in areas. The process whereby local planning authorities consult on all of the important aspects that are needed to create successful places and the increased emphasis on partnership working will enable all issues to be considered comprehensively and holistically. This is an important process for establishing support for small shops, to understand that there are inter-connecting issues which need to be addressed.

Government Policy Planning Policy Statement 6 – Planning for Town Centres (2005) has been instrumental in providing direction to regional and local planning authorities in the planning for town centres. PPS6 main objective is on the growth and development of existing centres. Other objectives include: enhancing consumer choice; supporting an efficient, competitive and innovative retail sector; and improving accessibility, social inclusion; development in deprived areas; economic growth; more sustainable patterns of development, and efficient use of land.

However the PPS has no specific guidance for the protection for small / independent retailers and is absent on guidance on addressing and assessing the needs of retailers.

The emerging PPS4 – Planning for Prosperous Communities, states that "local planning authorities should proactively plan for consumer choice and promote a competitive town centre environment by:

- Supporting the diversification of uses
- Planning for a strong retail mix
- Recognising that smaller shops can significantly enhance a town centre
- Retaining and enhancing existing markets and reintroducing or creating new ones
- Planning for a range of tourism, leisure and cultural activities
- Taking measures to conserve and enhance the established character and diversity of their town centres"

Whilst the PPS has only recently been through public consultation, and is still under preparation, the general thrust is encouraging and promoting competitive town centres, and also the attention to small and independent retailers is endorsed by Southwark. The role smaller shops play in the town centre hierarchy is very important and needs to continue to be addressed in order to retain not only economic prosperity for boroughs, but also services that are vital to the quality of life of many residents.

The Southwark Plan (2007) includes clear policy direction for the protection of small shops and services. The adoption of planning policies for guiding new retail provision and protection of existing provision within the town and local centres and outside the centres, demonstrates that Southwark is clear about what it wants to achieve and what responsibility it has in ensuring the success of its shopping areas.

These policies have been reasonably successful in maintaining a balance of retail uses in our town centres and parades, ie retaining the balance of A1, A2 and A3-5 uses. Where they have been less successful is in influencing the types of shops and their impact on the character of a centre. Some of our centres, for example Peckham and Camberwell still have a high proportion of independent retailers in comparison with other centres of a similar size. In other centres, such as Lordship Lane, we have found that their character is slowly being eroded by diminishing numbers of independent units and increasing numbers of multiples and franchises. This has been partly due to the success of these centres, where increasing affluence in surrounding areas has served to push up rents in shopping parades for retailers. Because the use classes order does not distinguish between occupiers, the planning system has little influence over this issue.

While it would be beyond the scope of this review, a review of the way the Use Classes Order operates would be beneficial.

What are London local authorities doing to support small shops and neighbourhood and local shopping centres through the planning system, Development Plan Documents, or proposals under the Sustainable Communities Act?

Southwark's planning policies within its Local Development Framework aim to maintain a network of successful town centres which have a wide range of shops, services and facilities to help meet the needs of the population of the borough. The continued attractiveness and viability of Southwark's centres and shopping parades depends on the range and critical mass of retail services on offer being maintained.

The Southwark Plan (2007) contains policies which seek to protect and encourage shops, in order to improve the quality and quantity of service provision in accessible locations for surrounding catchment areas. These policies:

- Identify and protect shopping frontages and apply criteria to assess the balance of uses on these frontages;
- Protect corner shops, pubs and smaller parades where these are viable.

In accordance with the London Plan the intention of these policies is to promote more sustainable shopping patterns, ensuring that convenience retail facilities and other local services such as pubs, restaurants, laundrettes etc. are provided in locations which are accessible on foot.

Southwark is currently progressing its Local Development Framework. The Core Strategy DPD is at the submission stage and will be out for formal consultation in January 2010. The thrust of the Southwark Plan retail policies has been carried forward in the Core Strategy and has been informed by a retail study.

The Council is also preparing Area Action Plans for Canada Water (Rotherhithe) and Peckham which will include area specific policies for addressing small shops. The draft Canada Water AAP requires as part of the regeneration of Canada Water town centre, the provision of a range of shop units of differing sizes, including units suitable for independent occupiers and indicates that the council will use s106 obligations to ensure that a proportion of these are secured for independent occupiers.

Outside of planning system:

In 2007, Southwark developed the Improving Local Retail Environment (ILRE) programme. With its roots in Southwark's Enterprise Strategy and proposals put forward in Southwark's LEGL bid, particularly investment in retail areas outside the major town centres, the scheme seeks to increase trade in smaller shopping parades and areas across the borough.

Target areas were chosen according to criteria, including; deprivation levels, location, size of target area, crime levels, proportion of vacant units and other proposed works such as infrastructure renewal. Community Councils were consulted on which areas should be prioritised and those preferences were incorporated into the final list of approved sites.

Trader engagement is at the heart of the ILRE programme, with traders encouraged and supported to share responsibility for the barriers they face, and take ownership of proposed improvements. Improvements can encompass a broad range of physical works, such as shopfront renewal, security enhancements, street furniture, planting and other public realm investments. However, traders are also supported in adapting and changing their business and taking advantage of incentives and programmes available. Southwark's Economic Development Team funds a range of business support services that provide free independent advice and guidance. Businesses are expected to take advantage of available advice as part of their involvement in the scheme. In practice, businesses have benefited from:

- Access to rates relief
- Critiques of existing business model and suggestions for improvements
- Support in developing business associations
- Access to refinancing and new loans
- Support in reducing environmental impact of businesses and encouraging sustainability

ILRE's pilot project is the Great Suffolk Street parade (at the junction with Southwark Bridge Road). Engagement with the traders began in July 2008, with traders meeting regularly and with Southwark Council support to identify barriers to trade and how to overcome them. The agreed works at Great Suffolk Street were a combination of shopfront improvements and street works, with an emphasis on linking the two sides of the parade together and encouraging shoppers to make multiple visits to shops within the parade. Traders contributed to the scheme, by matching the amount of Council investment in each unit. The resulting improvements are genuinely trader-led and 'owned', with traders much more likely to sustain the improvements than if they had been imposed.

Alongside the physical improvement works, traders have benefited from advice given by business support services, including steps towards establishing a local business association.

What, if any, progress has been made in relation to planning and related areas following the recommendations made by a number of bodies over the past years?

Whilst not a direct response to recommendations made by bodies/ reports listed in Appendix 2, Southwark's ILRE programme takes its steer from Southwark's Enterprise Strategy 2005-2016 (currently being reviewed). Of relevance to this consultation exercise, the Southwark Enterprise Strategy was informed by reports and recommendations including; the Policy Action Team (PAT) report: Improving Shopping Access

for People Living in Deprived Neighbourhoods, and the Joseph Rowntree Foundation report: Retailing, Sustainability and Neighbourhood Regeneration.

How can the Mayor's commitment to help protect the high street best be implemented through London Plan and other policies?

The London Plan could be more explicit in its policies in highlighting the importance local planning authorities play in implementing a strong business support framework. Emphasis on local planning authorities actively working with their economic stakeholders in promoting regeneration and sustainable growth of local business environments is particularly important.

Southwark Council is supportive of policy 4.9 in the draft replacement London Plan. The reference to the use of s106 obligations to secure small units for independent traders is helpful. Some research into best practice examples of where this has been used successfully would be helpful. Such research could inform further guidance within an SPG.

What outstanding actions and opportunities are in order to support and to help small independent retailers in London and facilitate ongoing support?

- Source London-wide funding to match borough investment schemes, giving greater value.
- Support in London-wide promotion of local shopping centres, i.e. through TfL advertising etc
- Clear policy direction through the emerging London Plan to promote retail choice and secure units suitable for independent occupiers
- Research and dissemination of good practice by the GLA/LDA in order to demonstrate how the independent retail sector can flourish alongside large scale town centre/retail/housing development and/or in an adverse economic climate.
- Investment in promoting development and application of the above as well as local, borough-led schemes

I hope these comments are helpful and look forward to receiving the outcome of the review.

Yours Sincerely

Councillor Paul Noblet
Executive Member for Regeneration

SSLC071-London First

[Report is available at http://www.london-first.co.uk/documents/LF_retail_comm_report_final.pdf]