



JOINT SUBMISSION TO CONSULTATION ON SCOTTISH PLANNING POLICY

The Scottish Grocers' Federation and ACS (the Association of Convenience Stores) welcomes the opportunity to jointly submit views on the proposed Scottish Planning Policy Consultation.

Together we represent over 33,500 local shops across the United Kingdom, our members include both national chains such as Scotmid Co-operative Society, Martin McColl and the Co-operative Group and independent retailers. More than two thirds of our members are independent retailers that trade either completely independently or as part of a common brand such as, Spar, Costcutter, Londis and Premier.

Contribution of Local Shops

Convenience retailers are a vital contributor to both the Scottish economy and its communities. There are more than 5000 convenience stores, providing more than 40,000 jobs. The convenience sector is a highly entrepreneurial with more than 70% of stores being owned and run by independent retailers of all ages and a diverse range of cultural backgrounds.¹

Local shops trade in a variety of locations including estates, neighbourhoods and rural settlements. They are a crucial feature of the commercial centres that provide a focal point for the cities, towns and villages across Scotland.

Local shops are used and valued by every group in society, and 24% of the customers visiting a convenience store visit the store every single day.² The local shop is of particular importance to older customers, especially those who are less able to use the big supermarkets.

National Planning Policy

It is vitally important that national planning policy is sensitive to the important role that local shops play will continue to play in delivering growth, investment and jobs in communities throughout Scotland. National policy and how it is interpreted in plan making and development management contains significant opportunity, but also significant risk for the future sustainability of local shop provision throughout Scotland.

We strongly support the recommendation of the National Review of Town Centres regarding the importance of applying the 'town centre first' principle and we welcome the prominence of the principle in this Policy document.³ However we are concerned that the performance of

¹ ACS Local Shops Report 2012 www.acs.org.uk/research

² ACS Local Shops Report 2012 www.acs.org.uk/research

³ <http://www.scotland.gov.uk/Publications/2013/07/7250>

local planning authorities in promoting investment in town centres has historically underperformed against other parts of the United Kingdom. For example in the period up to 2006 the percentage of new retail floor space developed in town centres was only 22%, significantly lower than in England which in the equivalent period saw 35% of new retail floor space being developed in the town centre.⁴

This significant tolerance of out of town retail development over a number of years has contributed to underinvestment in town centres and played a part in 16.7% vacancy rates currently experienced in high streets throughout Scotland.⁵ The development of this new Planning Policy for Scotland must be treated as an opportunity to reinforce the town centre first principle, provide clarity and reassurance to investors and promote investment that will regenerate centres.

Response to Questions

This section provides answers to consultation questions 1-4 as well as specific comments on identified paragraphs.

Question 1 – Do you think that the measures outlined in paragraph 15 to 23 are appropriate to ensure that the planning system supports economic recovery and sustainable economic growth?

We support the intention of paragraph 17 which states “*[the planning system should] attach significant weight to economic benefit of proposed development as a material consideration, particularly the creation of new jobs, recognising and responding to economic and financial conditions*”.

Our concern is that this important objective can be selectively and simplistically applied, especially in development management. In the case of planning applications for large retail developments claims about job creation can override other considerations that are vitally important to effective decision making.

It is vitally important that job claims are effectively and consistently scrutinised. ACS research provides clear recommendations on how job claims associated with development proposals should be assessed. ACS has set out what it considers to be best practice in this regard and this is fully endorsed by SGF⁶.

Principles in Scrutinising Job Claims (ACS, July 2012)

- jobs created should be expressed in terms of full time equivalent jobs not all jobs
- job claims should be based on the average number of full time equivalent jobs in the business after 18 months of operation
- job claims must be assessed against economic impact on other retailers (especially in town centres) to arrive an estimated net increase in jobs

⁴ <http://www.bpsc.org.uk/research/forp/project06.htm>

⁵ <http://www.bbc.co.uk/news/uk-scotland-scotland-business-20219469>

⁶ <http://www.acs.org.uk/en/research/planning.cfm>

Therefore this principle should be amended as follows: “[the planning system should] attach significant weight to economic benefit of proposed development as a material consideration, particularly *the contribution of new developments to a net increase in employment in the Scottish economy*, recognising and responding to economic and financial conditions”.

Para 24-30 definition of sustainable development

We recommend that the ‘town centre first’ principle is included in the list of attributes that contributes to sustainable economic development as set out in paragraph 27.

Question 2 – Do you think that local authorities should prepare town centre health checks as set out in paragraph 55?

Yes – the collection of data is vital to effective plan making for town centres. We believe that the attributes set out in paragraph 55 are consistent with best practice in this area.

We support in particular the reference to the importance of assessing the strength of a diverse retail offer, between multiple chains and independent retailers. However this could be strengthened to include diversity of retailer types and formats, for example markets, specialists and general retailers.

We support requiring the updating of these assessments every two years. However this should be based on maintaining and updating existing data, not undertaken as a set piece research exercise every two years.

Question 3 – Do you think that local authorities should prepare town centre strategies, as set out in paragraph 56?

Yes – effective strategic management of town centres is vital to achieving change in town centres. Agreeing a long term vision, bringing partners together and addressing barriers to growth investment and change are vital to success. Making this a policy requirements would be a step forward, however there will need to be significant on-going support and monitoring of this process from the Scottish Government to ensure meaningful strategies and partnerships are being established.

Para 59 - Town Centre v Network of Centres

We are concerned that the policy is not clear enough on whether the ‘town centre first’ principle applies to an identified main town centre or to the network of centres that the policy identifies should be established in para 59. Therefore whether health checks (para 55) and strategies (para 56) should be conducted for all centres or just the ‘main town centre’

This is particularly important in conducting effective sequential and impact assessments. We recommend that it is made clear that sequential and impact assessments should be undertaken not only taking into account the impact of a large out of centre retail, commercial or leisure development on the identified [main] town centre location but on the network of centres that could be affected especially local or neighbourhood centres.

Para 64-67 – the sequential and impact test

We support the intention of these paragraphs. However our experience is that unless the policy is clear and unequivocal about the primacy of ‘town centres’ then the policy can be

easily undermined in development control decisions and especially in appeal and planning inquiries.

Para 64 in particular could be interpreted as undermining the sequential principle to site allocation. It should be incumbent on the developer and the council to think creatively about how retail, commercial and leisure needs can be met within existing centres or in natural extensions to existing centres and not to allow them to simply dismiss this option because the development is deemed inappropriate for the centre.

Therefore we would recommend introducing a clear statement as an additional paragraph in this section stating: *“Where an application fails to satisfy the sequential test (as set out in paragraph 63) or is likely to have significant adverse impact (on the factors set out in para 66) it should be refused.”*

Question 4 – do you think that the town centre first policy should apply to all significant footfall generation uses and the sequential test be extended to this wider range of uses?

Yes – modern town centres must be a focal point for bringing together a range of economic, public and social functions and including all commercial, leisure and retail development within its scope is important to achieving this aim.

Further Information

We would like to provide further information to assist in the development of planning policy and share any expertise about the impact of planning policy and developments on local shops. For further information contact:

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Annex A

The Scottish Grocer' Federation

The Scottish Grocers' Federation (SGF) is the only national trade association for Scotland's convenience store sector. SGF has 2,000 members in a sector that employs 40,000 people and contributes some £3.2 billion to Scotland's economy. Our central aim is to ensure that key policy and decision makers understand how to improve the trading environment to allow for continuing investment, job creation and development by convenience store retailers

The Association of Convenience Stores

ACS is the trade body representing the interests of over 33,500 convenience stores operating in city centres as well as rural and suburban areas. Members include familiar names such as Martin McColl, Spar, Nisa Retail and The Co-operative Group, as well as independent stores operating under their own fascia. Our members operate small grocers, off-licence or petrol forecourt shops with between 500 and 3,000 square feet of selling space.