



# **A strategy for successful community hubs**

**COMMISSION INTO SMALL SHOPS IN THE HIGH STREET**

**JULY 2008**

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# Healthy Towns Make for a Healthy Country

## Foreword by Brian Binley MP

Our town and city centres lie at the heart of our communities and are as vital to their health as the heart is to the body. Yet over the last thirty years or so, the centres of many of our communities have suffered a gradual but persistent decline. Ring roads have isolated them, parking charges have depleted them, out-of-town development detracted from them, poor planning undermined them and anti-social behaviour made them less safe and less attractive places to visit.

Whilst many of the individual factors might in themselves not seem to cause major harm, their combined effect over many years can be to put once-active and robust community hubs into seemingly interminable decline. This naturally has an impact on the pride and sense of belonging people feel towards their own communities, but also their country too. Too often I hear people say their town centre is a mess, and in the very next breath add that the country is going downhill, almost as though the two were directly linked. And perhaps they are.

The most obvious symptom of this decline is the near disappearance of the independent small retailer from our high streets. They provide diversity, charm, interest and a level of personal service that is becoming all too rare in today's town centre, and their loss is keenly felt by many. The boarded-up shop fronts, the graffiti, the absence of visitors, all pay sad testimony to the decay of so many of our towns.

However the trend is not irreversible; restoring small shops to our town centres can be as iconic as restoring salmon to the Thames.

This document outlines a strategy for restoring the ability of local communities to act collectively to rebuild the health of their community hubs. It suggests a new framework together with possible options which are by no means prescriptive and through which new local ventures can be mobilised to support a new wave of community revitalisation, be it in satellite areas around big cities, in smaller cities, towns or in the village high street.

With people in local communities acting together to revitalise our high streets, we believe we will create a renewed sense of well-being which will impact upon the health of the nation as a whole. We recommend it to the Conservative Party as a positive framework for new policy strategies.

It is my pleasure to thank all the members of the Commission who worked so hard and so diligently to help create this strategy paper, to thank all those organisations and individuals who submitted contributions and in so doing provided the seed corn for our work, and finally, to my own Parliamentary staff, who have worked hard to produce this document. I am immensely grateful to them all.



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## **Executive Summary**

This is the Final Report of the Commission into small shops in the high street. Over the past year, we have been examining the reasons behind the rapid decline in the number of small independent retailers in our high streets and assessing the consequences of this for the quality of community life in Britain.

Our Interim Report, published in April 2008, found that many small shops are being driven from our high streets, not because of consumer preferences, but due to a range of undue pressures that disproportionately affect the small retailer: from crippling tax and regulatory burdens, through to the rising tide of antisocial behaviour in our streets. We also warned of the hugely negative impact of this decline, not only in terms of neighbourhood diversity and vitality, but also in terms of the loss of essential support networks for some of the most vulnerable members of our communities.

We stated in that report that it is time to stand up for small retailers and recognise the vital role they play in our nation's towns, cities and villages. Following wide consultation with industry and local government experts, our Final Report recommends a six-point Action Plan for helping small shops continue to thrive in our high streets. It then outlines a series of options that could help achieve in those goals.

### **We recommend that a Conservative government:**

- 1. Play a leadership role in promoting town management partnership initiatives that encourage local communities to work together to protect and improve the quality of their high streets.**
- 2. Allow local councils to ensure out-of-town retail developments work with, not against, the needs of local communities; it should allow them to retain the vital needs test, and consider the promotion of planning options that allow a diverse retail mix to flourish.**
- 3. Encourage more local authorities to promote joint initiatives with businesses and the police to tackle crime and disorder; options for strengthening local responses to key visible forms of disorder that damage high street vitality should be considered.**
- 4. Seek to preserve the conditions in which small retailers can compete fairly, in recognition that unfair trade disadvantages are disproportionately damaging to the small independent retailer.**
- 5. Encourage councils to give stronger consideration to the impact of parking provision and charging on high street and town centre vitality; new options could include opening up the car parks of local authority and other public buildings to shoppers and visitors at weekends.**
- 6. Review business rates and rent arrangements, with a view to ensuring they are fair to independent retailers, and that more is done to promote the rate relief available to the smaller shops, much of which goes unclaimed.**

## **Purpose of the Commission**

The Commission was established to look into the future of small shops in Britain's high streets and bring forward new ideas to regenerate our country's town centres.

We conducted consultations with a wide range of retail and local government experts and other interest groups, to consider the threats and opportunities facing small independent retailers. We also looked at common characteristics of successful town centres.

We examined a broad range of issues, including retail and commercial activity, planning and development, local taxation, crime and policing, traffic management and transport. The Commission's Interim Report was published in April 2008, and this showed how important small shops are to our high streets, examined the reasons behind their decline, and looked at the negative impact this is having on our communities.

Our objective now is to contribute to new policy strategies for restoring the ability of local communities to rebuild and revitalise their high streets.

The Commission is chaired by Brian Binley MP, Chairman of the Conservative Parliamentary Enterprise Group, and includes the following members:

Philip Dunne MP (Ludlow),

John Redwood MP (Wokingham),

Nigel Evans MP (Ribble Valley),

Geoffrey Cox MP (Torridge & West Devon),

Paul Hobden, architect and town-planner

Clive Davenport, Policy Chairman, Federation of Small Businesses

Kate Nicholls, Head of Communications, Association of Licensed Multiple Retailers,

ACC Peter Davies, Lincolnshire Police, Association of Chief Police Officers,

James Lowman, Chief Executive, Association of Convenience Stores

John Dean, Chief Executive, British Shops and Stores Association

David Ramsden, Chairman, Deregulate UK

Brian Binley, the Chairman, thanks all the members for the contributions they collectively made to the Commission's final report.

## **A new framework for successful Community Hubs**

This Commission has analysed a number of partnership strategies between businesses and councils, and other agencies such as the police, that aim to enhance the quality of our community centres. Some examples of these appeared in our Interim Report and included innovative civic renewal strategies being adopted by various councils, and examples of successful local partnerships between retailers and local agencies, as well as voluntary organisations that are strengthening local decision-making and producing real benefits for the local community.

Efforts to help coordinate better management of our high streets began with the introduction of town centre managers in many towns in the 1980s and 1990s. Today there are more than 500 towns and cities in the UK that have some form of management initiative.<sup>1</sup> These partnerships deliver a comprehensive response to a variety of local issues affecting town centres and are presided over by a town centre manager. The growth and development of these partnerships in recent years is due to the fact that they generate real value to local communities in terms of commercial vitality and quality of life.

The Association of Town Centre Managers (ATCM) has worked with the Government for some years to bring about the introduction of Business Improvement Districts (BID's) into the UK and has been responsible for the National BID's Pilot Project. A BID is a defined area where businesses collectively invest in local improvements alongside those traditionally covered by local authorities. Local businesses ballot on whether to provide additional monies for these improvements and the management of the board is normally drawn from the Private Sector. BIDs are supported by a range of stores as well as some of the larger chains, notably Boots.<sup>2</sup> At present, 42 BID's have been successfully established across England and Wales.<sup>3</sup>

However, in spite of the availability of such good partnership strategies, in many towns in the UK, participation is patchy. The Commission has found that low awareness appears to be a particular problem. We also found that some initiatives overlap and that there is often no overall strategy that can encompass the collective efforts needed to regenerate ailing town centres or bolster successful ones.

In addition, we found there were real difficulties in starting partnerships, particularly in areas which were already in decline. The perception is often that too much money or effort will be required to improve these areas, and businesses in them are already under strain and suffering from decreasing footfall. This perception was especially acute among start-up businesses, rather than more established shops and firms, which obviously face great pressure in terms of time and cash flow, and particularly for the BID initiatives.

But small improvements through localised initiatives can make a real difference and do not always have to involve large sums of money being collected. ShopWatch, for example, is a volunteer scheme that simply encourages shop staff to take a proportion of time to act as local security wardens, providing additional eyes and ears for the

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1 Association of Town Centre Managers [www.atcm.org/about](http://www.atcm.org/about)

2 Boots support the principle of Business Improvement Districts and support a BID levy of 0.5% to 1% of rateable value

3 The National Bids Advisory Service [www.ukbids.org](http://www.ukbids.org)

regular police. The scheme achieves excellent results: on average, it leads to one arrest per voluntary tour of duty.<sup>4</sup>

The Commission believes that so many more communities could benefit from this local partnership approach, involving key civic bodies such as retailers, councils and the police. Many of the submissions we received from retail and local government experts advocated the promotion and support of local partnerships to support the better management of crucial high street shopping areas.

We recognise that the resources and expertise will not be present in every area to proactively set up such initiatives. Also, every community hub is different and we do not believe a Conservative government should attempt to create new standards or schemes to be imposed on local communities from Whitehall. But it can offer support, encouragement and other help, such as issuing guidance and other resources, or by sharing best practice from existing successful initiatives around the country.

**We recommend:**

**That a Conservative government play a leadership role in promoting town management partnership initiatives that allow local communities to work together to protect and improve the quality of their high streets.**

## **A suggestion for a new framework - The concept of CHE Areas**

The Commission felt that a more inclusive framework would give a new impetus to reinvigorate our community hubs, be they sited in satellite areas around cities, in our smaller cities, in towns or in our everyday, small community high streets and the concept of a Community Hub Enterprise Area, or CHE Area, provides a possible model for such a framework.

The idea of a CHE Area was borne from the discussions with various retailers and support groups. Recognising that every community hub will be different and with a view to maintaining individuality in those communities, the options provided in this report allow for a menu of choices which CHE Area Boards might wish to use but they are by no means exclusive and the framework is designed to allow for creativity and an evolutionary process.

**OPTION 1.1:** To create new Government initiative at local level to be designated *Community Hub Enterprise Areas* (CHE Areas) to incorporate the many existing initiatives including Business Improvement Districts, Retail Crime Partnerships, Town and City Centre Partnerships and other relevant projects in one framework.

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<sup>4</sup> ShopWatch results: see <http://www.shopwatch.info/about/results.php>

- OPTION 1.2:** That CHE Areas be created as a formal partnership by the relevant local authority and a CHE Area Board be constituted consisting of representatives from the local authority, the local business community, the Police, local civic bodies and other bodies as considered appropriate.
- OPTION 1.3:** That CHE Areas be defined by the local CHE Area Board following consultation with the local community and be submitted to the CHE Directorate at the Department of Business Enterprise and Regulatory Reform (DBERR) for authorisation.
- OPTION 1.4:** That relevant powers required to effectively run the CHE Areas, at present held in the hands of national, regional, metropolitan, city and county authorities including powers relating to planning, crime, local taxation, rates and rents, transportation and parking be devolved to local authority bodies and the local constabulary, working in conjunction with the CHE Area Board.
- OPTION 1.5:** That a CHE Directorate be created within the Department of Business Enterprise and Regulatory Reform to oversee, promote and support CHE Area initiatives.
- OPTION 1.6:** That the CHE Area project be enacted early in the first Parliament of the next Conservative Government.

## **A new approach to planning**

Local retailers in our high streets are affected by a huge range of decisions made by government at the local, regional, national and international level. From EU rules on weights and measures<sup>5</sup> to local decisions on bus routes, local retailers have to negotiate the complex decisions produced by a multi-layered bureaucracy. These rules are incredibly important and, when made successfully, add great value to our local communities. Planning rules are particularly relevant in this regard.

Local authorities are the most visible and influential of the layers of government and have considerable influence in all of the areas reviewed by this Commission. Consequently they have the greatest power to irrevocably damage or greatly improve the local business environment.

The British Council of Shopping Centres impressed on the Commission that the principles of good urban design must sit at the forefront of strategies for renewal and that 'new development and differentiation must be a priority in order to achieve destination pull.'<sup>6</sup> We looked into how to attract small retailers back to town centres, how to help them to influence planning guidance and committees and whether planners have in general helped or hindered the involvement of small retailers in town centre redevelopment over the last few years.

The Institute of Place Management, which contributed to the Commission, have researched many towns around the UK and argue that the planning system should prioritise the protection and enhancement of town centres and local neighbourhood shopping centres over and above out-of-town / edge-of-town retail development. The Institute believes that it is no longer acceptable for decisions made at local and national level to be reached without the input of those it will directly affect and the Commission agrees with this.

The Commission's view is that the majority of councils can do far more to capitalise on their towns' unique heritage, history and location. The promotion of farmers' markets, tourism and historical buildings can all play their part in emphasising a community's distinctive feel and there are many examples of towns that have regenerated themselves through playing to their geographic strengths.<sup>7</sup>

Market towns are a good example. The National Market Traders Federation note that social spaces are currently often designed without any thought for a market and Redditch was cited as an example of the fluctuations in the fortunes of a market at the hands of poor decision-making.<sup>8</sup> The Commission believes local authorities should give more thought to ensuring that space exists within town centres for market traders.

The Commission also assessed the current 'needs test' which is incorporated within Planning Policy Statement 6 (PPS6), first introduced by John Gummer in 1993. PPS6 has the most direct relevance to the retail sector and the commercial balance of large and small retailers in any given town or village, an importance noted by the Competition Commission in their recent Grocery Market Investigation.<sup>9</sup>

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5 See, for example, the case of the 'metric martyr' Steve Thoburn, <http://news.bbc.co.uk/1/hi/england/wear/7194524.stm>

6 BCSC: Future of Retail Property, Future Shopping Places, p7

7 'Regeneration in Historic Coastal Towns,' – An English Heritage Report that highlights notable successes

8 NMTF submission to the Commission.

9 Competition Commission Appendix 6.1: 'The Planning framework for grocery retailing' Sections 5 and 6, 31/10/2007

PPS6 sets out government policy on planning for town centres and requires a needs assessment to be conducted when an application for an out-of-town development is made, ensuring there is a genuine need for this in the local area.<sup>10</sup> However, the Government's White Paper on Planning, published in May last year, contained proposals to scrap the needs test for out-of-town retail developments,<sup>11</sup> a recommendation that many experts believe could damage town centres by making such developments far easier to pass. For example, the Association of Town Centre Management argues that the removal of the needs test will accelerate the decline of town centres by undermining the strength of existing planning policies and permitting far more out-of-town development.<sup>12</sup>

At present edge-of-town development is the most successful retail location with sales growing by 40% over the last 5 years to £72billion. But the reasoning behind the White Paper's proposal to scrap the needs tests stemmed from the Barker Review of Land Use Planning which argued for its removal because it was liable to 'protect incumbents and give preference to operators that have lower sales densities.'<sup>13</sup>

Whilst the Commission notes those concerns, it believes local authorities should have more say in matters that potentially affect the vitality of crucial shopping areas, and that the retention of the needs test is vital to allowing councils to make appropriate decisions for their own areas. In fact, 96% of local Planning Officers are against the removal of the test.<sup>14</sup> Several of our contributors, including Friends of the Earth, argued that the test should actually be strengthened, perhaps including such impact measures as local economic yield, diversity of retail representation, a carbon test and quality of place and life measures. The recent Competition Commission enquiry also called for a 'Competition' test to be applied to new supermarket development.

Thoughtful and long term planning decisions can make such a huge difference to the quality of community life that the inclusion of a 'diversity' test could also be considered to help local councils keep an optimum balance of the types of shops available to people in their local areas.

Other areas of planning law can also be looked at, such as Use Class orders. These are in place to ensure a broad balance of retail mix for the high street, but at present do not differentiate between large and small retail shops. The Commission believes that a review of these orders may be beneficial, specifically to allow for a separate category to be created for coffee shops, which currently fall within the 'A3' category for all restaurants, takeaways and cafes.

It is so important that our high street and town centres are not simply allowed to lose their character and sense of place, which are so vital to attracting shoppers, simply due to the bad use of planning regulations. Many organisations submitting to this Commission were concerned at the aesthetic decline of the high street. We believe, therefore, that there is a case for including supplementary design guidance within statutory 'Local Development Frameworks' to ensure that the aesthetic erosion of our traditional high streets is reversed.

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10 This refers to the sequential nature of planning procedures for out-of-town commercial developments introduced in 1996 as part of PPS6, including the requirement for a needs assessment

11 DCLG White Paper – Planning for a Sustainable Future, p25

12 ATCM Position Paper – Need Test, Association of Town Centre Management, January 2007.

13 Barker Review of Land Use Planning: Final Report – Planning for town centres, 1.32 - 1.33, December 2006

14 Friends of the Earth survey from their Briefing on the Planning White Paper January 2007, p2,

Good planning is so crucial to the future of our independent high street retailers, especially considering the planned expansion of out-of-town development: 2.4 million square metres of additional shopping centre retail space will be added to that market between 2008 and 2012, bringing the total to 28.3 million square metres by 2012, which will be boosted by the planned completion of a number of major retail projects.<sup>15</sup> With only 40% of new retail space over the next ten years planned for town centres,<sup>16</sup> the Commission hopes some of the planning options described here will be considered for their potential to allow diverse independent businesses to flourish.

**We recommend:**

**That a Conservative government allows local councils to ensure out-of-town retail developments work with, not against, the needs of local communities; it should allow them to retain the vital needs test, and consider the promotion of planning options that allow a diverse retail mix to flourish.**

## **Suggested options to support a new approach to planning**

**OPTION 2.1:** That Section 106 agreements be reviewed to allow for greater local flexibility and be labelled 'Community Enhancement Funds.'

**OPTION 2.2:** That a Diversity Test be incorporated into all retail planning guidance to ensure that an adequate provision for well-sited and affordable small retail outlets exists within all CHE Areas.

**OPTION 2.3:** That the 'Needs' Test together with a continuation of a sequential approach be retained and strengthened for all important planning decisions within the local government area.

**OPTION 2.4:** That a new and separate 'Use Class' be created for small shops and that the 'Use Class' for coffee shops and internet cafes be re-designated 'Class A1' creating a separate and new 'Use Class.'

**OPTION 2.5:** That the CHE Directorate at DBERR includes a unit to collate and maintain retail planning information to ensure that vital and comprehensive information is available at a fair but inexpensive price to all interested parties including CHE Area Boards and small retailers.

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<sup>15</sup> See Retail Bulletin, 6th February 2008 [www.theretailbulletin.com/news](http://www.theretailbulletin.com/news)

<sup>16</sup> Shopping Places for People, BCSC

- OPTION 2.6:** That all CHE Area boards be encouraged to ensure that space exists within each CHE Area for genuine market traders and should that need not be catered for and be seen as an important local requirement, to ensure that a relevant open space within the CHE Area be adapted for that use.
- OPTION 2.7:** To enable local councillors to have final refusal on a planning application within the CHE Area returned to them following appeal, provided that two thirds of the full council support that refusal.
- OPTION 2.8:** That supplementary design guidance be included within Local Development Frameworks in order to promote local and regional architectural Character.

## **A new approach to tackling crime**

Small shops on the high street rely heavily on the regular foot traffic of passers-by, as far less money is spent per customer in a small shop on any given trip than is spent in the large outlets. The principal factor in encouraging footfall is the existence of a safe, attractive environment in which to shop, so crime and antisocial behaviour pose a direct threat to high street retailers' viability.

A British Chambers of Commerce survey found that crime has had a negative impact on business location decisions (according to 73% of respondents,) inward investment (62%), expansion decisions (57%) and recruitment (49%).<sup>17</sup>

Retail crime costs high streets over £2billion per annum<sup>18</sup> and there was near unanimous agreement in submissions to the Commission that more action is needed to tackle this. The Commission's consultations with the retail sector showed that rising crime and disorder are posing disproportionately large problems to small shops.

The Federation of Small Businesses highlights that 40% of small businesses do not report crimes because of a lack of confidence in the criminal justice system.<sup>19</sup> With more shopkeepers killed in London than police and fireman put together<sup>20</sup> it is clear that law breaking is a major issue that is damaging the competitiveness of the retail sector.<sup>21</sup>

Physical violence against shop staff is up by 33% in the last recorded year (2005-6) and verbal abuse has more than doubled since 2000.<sup>22</sup> Further, this may not be the full picture of the scale of the problem, as current crime statistics do not allow us to break down business crime statistics by sector. Indeed the Association of Chief Police Officers has suggested that even defining business crime is problematic,<sup>23</sup> whilst the Government has not published the cost of retail crime in the last five years.<sup>24</sup>

The Commission believes local retail crime statistics should be collected as a distinct category to allow retailers and the police to better understand the nature of the difficulties being faced on our high streets. This would assist the development of more local responses to these problems, and to support these, we believe there could be far more cooperation between local retailers, councils and the police.

There are already a number of initiatives which aim to improve local coordination and response to business crime, such as Retail Crime Partnerships, which now number more than 200, and Action Against Business Crime schemes, both of which have seen very positive results. The Retail Crime Partnership in Northampton, for example, has reduced town centre retail crime by 30%.

However, there are barriers limiting the wider adoption of these initiatives. Whilst 81% of local businesses reported crime in their local area last year, only 27% of them were

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17 British Chamber of Commerce Crime survey, April 2008, p4

18 High street Britain 2015' – All Party Parliamentary Small Shops Group, 2006

19 'FSB Lifting the barriers to growth in UK small businesses, 2006. Also used in the 'Forgotten Fifth' report 2007

20 Tobacco Alliance submission

21 Musgrave submission

22 Retail Crime Survey, British Retail Consortium, 2007

23 ACC Simon Cole, ACPO lead on crime statistics

24 From Written Question number 192389 (06.03.2008)

aware that any kind of local partnership existed to help them tackle it, with awareness particularly low among the smaller organisations.<sup>25</sup> Funding is also a problem for those schemes that rely on government support. Although Action Against Business Crime has funding until October this year, no financial commitments have been given to continue its work beyond that time and unless replacement funding is found from private sources, the scheme will certainly be scaled down, if not stopped altogether.

There are good small local schemes, however, which are not costly, such as Community Safety Partnerships and ShopWatch, which has already been mentioned. These have proved especially good for sharing information, e.g. allowing the passage of intelligence and photographs of known thieves to be circulated among retailers.

Many more communities could benefit from local partnership approaches to tackling crime and disorder in high street areas, involving key civic bodies, such as retailers, councils and the police. We believe government should consider options for encouraging more of these to develop.

There are also other relatively less serious, often unreported forms of disorder, which our consultations revealed are causing major financial and commercial difficulties to retailers. These include widespread problems of graffiti, smashed windows and vandalism and doorways being used as urinals. Binge drinking in shopping areas was raised as a particularly sharply-rising issue of concern.

Our consultations raised particular concerns with the effectiveness of local authorities' powers to address drink-related anti-social behaviour through the introduction of a Designated Public Places Order. A DPPO is an area where it is an offence to drink alcohol after being required by a police officer not to do so. The police also have the power to require individuals to surrender alcohol and any opened or sealed containers, and if they fail to comply with the request they can be arrested.

The current guidelines for introducing a DPPO are complicated and involve lengthy consultation between the local authority, the police, the public, licensees in the area, and any parish or community council.<sup>26</sup> We believe there should be scope for simplifying and streamlining the process of introducing DPPOs, and strengthening the powers of the police to use them. The extension of alcohol referral schemes to include people under 18 could also be considered as a complementary measure that would help tackle the rising problem of underage drinking and related disorder.

The daily struggle against crime, much of which goes unreported, drains retailers of funds and can put people off visiting the high street altogether. The options set out above are necessary for reducing the more visible forms of disorder that plague our high streets and town centres, making them less attractive places to visit.

**We recommend:**

**That a Conservative government encourages more local authorities to promote joint initiatives with businesses and the police to tackle crime and disorder; options for strengthening local responses to key visible forms of disorder that damage high street vitality should be considered.**

<sup>25</sup> The Invisible Crime: A business crime survey, British Chamber of Commerce, April 2008

<sup>26</sup> Home Office Circular 13/2007, Annex A

## **Suggested options to support a new approach to crime**

**OPTION 3.1:** To abolish central government targeting relative to policing thus returning the ability for Police Authorities to create their own crime targets based on local need and not on national political imperatives.

**OPTION 3.2:** To extend the use of alcohol referral schemes to include those under the age of 18.

**OPTION 3.3:** To give local licensing authorities, in conjunction with the CHE Area Boards, enhanced ability to set a limit on the number of licensed premises within a CHE Area and define licensing hours to meet local needs.

**OPTION 3.4:** To encourage additional funding towards the cost of policing the night-time economy through compulsory NVQ training arranged by the Security Industry Authority to ensure that door supervisors understand their role in community safety and their responsibilities to the general public.

**OPTION 3.5:** To consider a consolidation of byelaws under a single statutory provision i.e. a Town Centre Management Act.

**OPTION 3.6:** To promote CHE Areas as neighbourhoods by encouraging the creation of Neighbourhood Policing Teams coterminous with the CHE area.

**OPTION 3.7:** To formalise the management of high streets through:

- a) Making the enforcement of parking regulations (Decriminalisation of on-street Parking Enforcement) compulsory for all local authorities and streamlining the implementation process.
- b) Simplifying and streamlining the introduction of Designated Public Places Orders (DPPO) by local authorities.
- c) Introducing Police powers (with appropriate safeguards) to impose a temporary DPPO for a limited twenty-four hour period without consultation.

**OPTION 3.8:** To encourage and better market the use of conditional cautions for first time offences of retail theft and other non-violent crimes, with conditions including exclusion, reparation and alcohol referral schemes

**OPTION 3.9:** To create a team of Area Ambassadors in larger CHE Areas, working closely with the neighbourhood policing team, to deal with citizens

enquiries, anti-social behaviour and provide general support and reassurance for the retail sector and the general public.

**OPTION 3.10:** To encourage CHE Area Boards to adopt and develop the ShopWatch initiative encouraging retail staff to become special constables to aid policing in the CHE Areas.

**OPTION 3.11:** To promote the use of Community Safety Accreditation, where appropriate, to help bind local policing teams with others engaged in the safety of shopping areas.

## **A new approach to retail competition**

We must be clear that we do not view larger retailers and chains as simply a threat to high streets and town centres, and in fact they make up an important part of the retail mix. The cost of living is rising for all of us and supermarkets play a key role in keeping that cost of living down. Still, the increasing market dominance of the major supermarket chains has led to concern over practices, which, in the words of the Competition Commission, 'give rise to a complex monopoly situation', and which 'operate against the public interest.'<sup>27</sup>

Below-cost pricing is of particular concern, where large retailers significantly undercut retailers on the high street by selling certain basics at a loss, in order that customers switch to the larger store, where losses can be recouped on other product lines. This behaviour has been officially criticised by the Competition Commission, in that it 'distorted competition and damaged smaller grocery retailers and convenience stores, thereby adversely affecting elderly and less mobile consumers, who tended to rely on stores operated by smaller retailers'.<sup>28</sup>

According to market research group TNS Worldpanel, the big four supermarkets (Tesco, Sainsburys, Asda and Morrisons) now account for more than three-quarters (76.2%) of the grocery market and the number of stores in their ownership has doubled since 2000.<sup>29</sup> As recently as April this year the Office of Fair Trading (OFT) announced two investigations into these supermarkets, one for alleged price fixing in health, beauty and grocery products and the second into the fixing of tobacco products.

We note that an OFT 2006 report stated that only 1.8% of the grocery lines of the 'big four' were sold below cost, but given their market share, this represents major disadvantage to independent retailers in the high street. We believe the Government should seek to preserve conditions in which small businesses can compete fairly, without stifling healthy competition. Britain's economy is driven by the small and medium-sized companies that make up 99% of all UK businesses, and unfair disadvantages are extremely damaging to this sector.

The Commission looked very closely at the recommendations made by the Competition Commission report published earlier this year. Whilst it notes the Competition Commission recommends that a weakening of rules against out-of-town development should be reconsidered (a study in Stalham, Norfolk, found a 55% decrease in footfall on the high street following the opening of an out-of-town supermarket<sup>30</sup>), the Commission does endorse both the suggested Supermarkets Ombudsman and a stronger code of practice.

Many of the submissions received from independent retailers also highlighted a concern over charity shops. Whilst the presence of these shops in the high street is very welcome, there is evidence that many are using the favourable conditions provided by local authorities explicitly to undercut local businesses on the sale of new, not second-hand products.

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<sup>27</sup> Market Investigation into the Supply of Groceries in the UK: Provisional findings report, Competition Commission, October 2007, p.22.

<sup>28</sup> Ibid, p.22.

<sup>29</sup> British Brands Group submission

<sup>30</sup> Friends of the Earth submission

Charity shops are currently exempt from Corporation Tax on profits and benefit from an 80% mandatory business rate relief with local authorities deciding how much of the remaining 20% to charge. A business rates concession to charities costs the Treasury an estimated £600m a year.<sup>31</sup> In addition, charity shops enjoy a zero rate of VAT on donated goods and in most local authority areas their waste is not treated as commercial.

Many local businesses are concerned that with their considerable buying power and increasing proportion of new goods, large charity shop chains are gaining significant unfair advantages over independent retailers.<sup>32</sup> Some of the new goods sold are fair-trade products and the Commission fully supports those products but it is clear that some charities have established new-goods-only shops, which compete alongside other retailers. All in all it is estimated that there has been a 50% increase in the percentage of new goods sold in Charity shops since 2001.<sup>33</sup>

This is clearly emotive territory and the Commission only proposes that a review of some of the exemptions enjoyed by charity shops should be undertaken, with a view to examining their appropriateness in shops where new goods are sold.

Other local services essential to communities are also under threat from policy decisions taken by central government. Perhaps the highest-profile of these is the Government's plan of cuts to the Post Office network. We have already seen around 4,000 local post offices shut down since this Government came to office in 1997, and a further 2,500 are also set to face the axe under their programme of closures. This has a direct link to local shop closures in many parts of the country, especially rural areas, since post offices often serve a combined function as the local shop. It has been estimated that as a result of planned post office closures, another 1,000 village shops could be lost at the same time.

There is innovative leadership from Conservatives on tackling Post Office closures. Conservative-controlled Essex County Council recently became the first local authority in the country to announce firm plans for taking over post offices currently earmarked by the Government for closure. The Council announced proposals to invest £1.5m over three years and is planning innovative solutions to bringing branches back to profitability, such as delivering postal services alongside local council services from the same premises. The aim is that branches will become financially self-sufficient and cost neutral to the Council, and the plans are now being negotiated with the Post Office.

The New Economics Foundation warns that Britain is now faced with the prospect of a 'tipping point' where the number of local independent outlets could crash dramatically rather than continue in steady decline. It notes the sharp loss of many corner shops, grocers, post offices and pubs, predicting that many small communities (of 3,000 people or less) will have no such local outlets by the year 2010. In some low-income neighbourhoods this is already a reality.

We do not believe undue restrictions should be put on competition from large retail or charity chains – small retailers know better than most that business is a tough game and they must adapt to changing consumer demands to succeed. But where there is unfair or unnecessary pressure, it is right to look at what can be done to ensure small

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31 <http://www.propertyweek.com/story.asp?storyCode=3041291>

32 [http://www.bytestart.co.uk/content/news/1\\_12/charity-shops-small-business.shtml](http://www.bytestart.co.uk/content/news/1_12/charity-shops-small-business.shtml)

33 Figures from Charity Finance Magazine

shops continue to thrive in our high streets. Trying to strike a balance between fairness and competition is difficult and the Commission has sought to engage supermarkets in their recommendations to ensure a holistic approach to the suggestions.

**We recommend:**

**That a Conservative government should seek to preserve the conditions in which small businesses can compete fairly, in recognition that unfair trade disadvantages are disproportionately damaging to the small independent retailer.**

**Suggested options for a new approach to retail competition**

**OPTION 4.1:** That a Conservative Government should commit itself to increasing minimum wage levels at no more than average inflation.

**OPTION 4.2:** That an effective and, if necessary, mandatory code of conduct for supermarkets be enacted to prevent abuses of market power arising from excessive market concentration.

**OPTION 4.3:** That rate rebate and other advantages given to charity shops which sell new products on a professional business basis be reviewed.

**OPTION 4.4:** That local planning authorities and CHE Area Boards recognise the need for a balanced mix of retail outlets taking into account that supermarkets and national brand chains attract sizeable footfall.

**OPTION 4.5:** That CHE Boards work closely with large retail chains and supermarkets to encourage them as part of their corporate social responsibility agenda to assist in the development and well being of small independent retailers, thereby recognising the importance of a vibrant and diverse high street.

**OPTION 4.6:** That CHE Area Boards actively promote the benefits of CHE Area facilities.

**OPTION 4.7:** That CHE Area Boards encourage out-of-town / edge-of-town supermarkets to prominently display maps that highlight the benefits, location and attractions of the local CHE Area.

## **A new approach to parking and transportation**

The speed and ease with which consumers can access shops is a major factor in where they choose to spend their money. Shopping is the most frequent reason for travel in the UK accounting for 20% of all trips in 2004 and 12% of total mileage. In the last thirty years the average length of distance travelled for a shopping trip has increased by 50%.<sup>34</sup>

One reason to explain this increase is the development of out-of-town retail centres, which allow easy and cheap access to larger stores. Some estimates suggest that up to 60% of motorists drive further to an out-of-town shopping centre simply because parking is easier.<sup>35</sup>

Bad parking facilities coupled with poor transportation into town centres severely restrict the footfall that high street retailers need. By contrast, well thought-out parking restrictions, coupled with sensible administration of those restrictions, can help to regenerate towns. In 2006 the Transport Select Committee recognised that 'controlling car demand is fundamental to sustaining the attractiveness of their town centre and that retail sales are being fuelled, not curtailed, by successful transport policies.'<sup>36</sup>

Parking restrictions and high charges in town centres are a real issue for many local traders. It is too early to tell whether recent government announcements that councils 'should not set ticket-issuing targets'<sup>37</sup> and not use parking enforcement to generate excessive revenue will have the desired impact. But the Commission believes councils should be encouraged to make much stronger consideration of the impact of parking rates on high street vitality.

A 2002 survey that assessed 174 centres and compared retail performance with amount and convenience of parking, identified that the quantity of parking available within 5 minutes walk of principal shopping streets had a significant impact on store performance. For medium and large sized towns the optimum level of parking provision was identified as between 45 and 89 spaces per 1000 sq metres of gross shopping floor space. It was recommended that at least 85% should be within 5 minutes walk of key shopping streets.<sup>38</sup> "Dwell time" and "pay as you leave" rather than pay on entry car parks could also be encouraged if the town centre is to retain a diverse retail offering.

From the perspective of a small retailer, the success of pedestrianisation depends on the local council's transport and parking policy. Because of the vehicle access issues that it raises, a poorly-implemented pedestrianisation policy can often be more of a curse than a blessing to a small shop on the high street. Further, pedestrianised commercial premises can often demand a rent 50% higher than other venues<sup>39</sup>, and this can be unmanageable for small businesses.

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34 BCSC, Future of Retail Property Statistics

35 Boots submission

36 Hansard, Transport Select Committee Report, November 3 2006 -

<http://pubs1.tso.parliament.uk/pa/cm200506/cmselect/cmtran/1317/1317am13.htm>

37 Transport Minister, Rosie Winterton MP, March 31st 2008

38 Boots submission, Lockwood survey

39 Doidge, R. & Patterson, R., 1994, 'The pedestrianisation myth: The regeneration game: the impact of pedestrianisation on retail rents', Erdman Lewis, London

Local authorities need to be extremely cautious when considering the pedestrianisation of small town centres, and sufficient access should be provided, whether in the form of affordable parking in town or a park-and-ride bus service on the outskirts.

With 83% of businesses believing that the present planning system for major transport projects is too bureaucratic in design and implementation,<sup>40</sup> the Commission suggests there needs to be a wholesale review of parking strategy in town centres. Easy access is a crucial prerequisite for the financial prosperity of independent retailers and thereby the vitality and diversity of our town centres.

We believe there is a real opportunity for local authorities to open up car parking space in local government buildings in out-of-work hours. Town Halls occupy prime positions in town and city centres and their car parks, often unused or underused at weekends, could be opened up to the public on Saturdays and Sundays. Some allowance for this already exists but the Commission suggests that councils are encouraged to proactively promote this policy.

Park and Ride schemes also provide a potential solution to parking problems. Shuttle buses can reduce congestion if the majority of local traffic is not passing through a town, but infrastructure in the form of out-of town car parks would be required and such a scheme would only be useful in larger towns.

Easing access to our high streets is like unblocking arteries, allowing free flowing movement to our city centres. It is vital to their longevity that councils do all they can to enable easy access to our shopping areas.

**We recommend:**

**That a Conservative government encourage councils to give stronger consideration to the impact of parking provision and charging on high street and town centre vitality; new options could include opening up the car parks of local authority and other public buildings to shoppers and visitors at weekends.**

**Suggested options to support a new approach to parking and transportation**

**OPTION 5.1:** That Local Authorities in conjunction with CHE Area Boards undertake an in depth review of CHE Area parking with the objective of creating a Parking Strategy. Options available for consideration include:

- a) A review of yellow lines with a view to eradicating them wherever possible and replacing them with parking spaces.

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<sup>40</sup> British Chamber of Commerce Report, November 1996

b) A realignment of parking charging strategy based on the premise that parking facilities in CHE Areas should serve the community and not be seen primarily as an income generating mechanism for local authorities.

c) That local authority parking facilities in and adjacent to CHE Areas should include a facility for free parking for a limited period to allow for 'quick stop' shopping.

d) That payment for parking in all local authority car parks be levied as users leave the car park to ensure that payment is based on a 'dwell time' basis rather than fixed payment for a specific times.

e) That 'Park and Ride' schemes be encouraged where relevant to cater for longer term parking needs, if so required by the local community and that the possibility of Park and Ride schemes managed and operated by private sector bus companies be considered.

**OPTION 5.2:** That the car parks of local and national government buildings in and around the CHE Area be opened for public use at weekends and that a review of the possibility of encouraging private companies within and adjacent to CHE Areas who do not use their car parks at weekend, to open them to the public where appropriate.

**OPTION 5.3:** That local authorities in conjunction with CHE Area Boards restrict loading to certain times of the day to ease traffic congestion in CHE Areas.

**OPTION 5.4:** That developers of large new housing developments consult with planning authorities and with public transport providers in order to create estates which are more user friendly to bus operators.

## **A new approach to local taxes and rents**

Cost is an overwhelming influence on the start-up and running of small businesses, affecting their longevity, profitability and siting. The sad truth is that at present the high street is becoming too expensive to start-up and run a business.

Corporate tax rates have soared from being the 4<sup>th</sup> lowest in the EU to the 19<sup>th</sup> lowest, and since 1997, the total cost of additional regulation and red tape placed on British business totals £66 billion, rising by £10 million alone last year.<sup>41</sup> The cost of complying with red tape is up to 30 times higher proportionately for small and medium sized businesses, which encompass almost all of the independent stores in our high streets.

In 2005, a revaluation of commercial property inflated retailers' bills by 10-25%, increasing the already wide differential between the ability of independents and chain retailers to gain retail space.<sup>42</sup> London's Evening Standard newspaper quotes several examples of small shops forced out of business by enormous increases in combined rents and rates over recent years, as part of their 'Save our Small Shops campaign.'<sup>43</sup> They cite examples of fifteen curry houses that have been forced to shut in Brick Lane, victims of rents that have doubled and rates that have increased 70% since 2004.<sup>44</sup>

The retail sector contributes over £4.5bn per annum to the Treasury in business rates, representing 25% of all revenue from these rates. In July 2007 the Government announced the introduction of Supplementary Business Rates, following recommendations made by Sir Michael Lyons' 2007 report. Supplementary Business Rates will do further damage and although there are some safeguards to prevent abuse by local authorities, and some smaller businesses will be exempt, many will be included.

The Commission reviewed Small Business Rate Relief, which at present allows properties with a rateable value of less than £5000 to 50% rate relief on their liability, with this decreasing by 1% for every £100 below a £10,000 rateable value. However, there is a widespread lack of awareness of this important relief and it has been estimated that businesses in Essex alone are losing out to the tune of some £6 million a year in unclaimed rate relief.<sup>45</sup>

Leasing arrangements are also an important issue. Historically the law of England and Wales has largely left businesses and their landlords free to negotiate the initial form of a commercial lease. At the beginning of a business tenancy the rent will be whatever the landlord and tenant agree but often the tenancy agreement may provide for Upward Only Rent Reviews (UORRs.)

The British Property Federation published research into 1,334 leases entered into since the introduction of the voluntary code (November 2003). The BPF found that 92% of these leases still contained upward-only rent review clauses. The BPF study claimed that the majority of businesses which had signed new leases containing

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41 British Chamber of Commerce, 2008 Burdens Barometer,

42 British Retail Consortium, <http://www.brc.org.uk/details04.asp?id=1143&kCat=&kData=263&sCat=Retail+Myths>

43 <http://www.thisislondon.co.uk/standard/article-23411591-details/Save+Our+Small+Shops/article.do>

44 <http://www.thisislondon.co.uk/standard/article-23425325-details/Rent+rises+driving+curry+houses+out+of+Brick+Lane/article.do>

45 John Baron MP, Hansard, April 3, 2008: Column 917

upward-only rent review provisions were offered alternatives but turned them down on the basis that they were more expensive.

In 2004, the Government launched a consultation into UORRs but in 2005 decided against legislating to restrict them. As a result the UK is the only country in Europe where upward only rent review, lengthy leases and a modified form of privity of contract co-exist. The Commission wants a further review of UORRs and for tenants to be given a right to break if the UORR produced a rent above open market levels.

The Commission also considered the issue of opening up living accommodation above business premises. The lack of residential use of vacant space above or below shops leaves some high streets deserted after shops close, which can encourage anti-social behaviour. Opening up this space would also help with the national issue of affordable housing. Residential Property Tribunals were able to issue Empty Dwelling Management Orders (EDMOs) from April 2006 in respect of potential residential space<sup>46</sup> and the Government's Housing Green Paper, published in July 2007, calls for greater use of EDMOs,<sup>47</sup> which we fully support.

**We recommend:**

**That a Conservative government reviews Supplementary Business Rates and rent arrangements, with a view to ensuring they are fair to independent retailers, and that more is done to promote the rate relief available to the smaller shops, much of which goes unclaimed.**

## **Suggested options to support a new approach to local taxes and rents**

**OPTION 6.1:** That local authorities and CHE Area Boards recognise the need to encourage the use of living accommodation above business premises by the extension of Business Rate Relief for a limited period.

**OPTION 6.2:** That proposals for Supplementary Business Rate or other such income generating schemes be rejected, recognising the additional burden such schemes place on small businesses.

**OPTION 6.3:** That local authorities be empowered, in conjunction with CHE Area Boards, to levy a rate free period of one year for new business start-ups thereafter allowing for a phased increase to full rate payment by year four.

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<sup>46</sup> EDMOs are a discretionary power of local authorities. Where a residential property has been vacant for a minimum of six months, one option at the disposal of an authority will be to seek an interim EDMO which will allow the authority to let out the dwelling with the proprietor's consent.

<sup>47</sup> DCLG, Homes for the future, July 2007, p.41.

**OPTION 6.4:** That CHE Area Boards encourage the creation of simplified standard leases for small retailers and business start-ups in the CHE Areas, paying particular attention to rent review clauses which automatically assume rent increases.

**OPTION 6.5:** That landlords of business premises be encouraged to levy monthly as opposed to quarterly rental payments recognising that cash flow plays a crucial role in the success of many small businesses.

## **Appendix 1: The Conservative Parliamentary Enterprise Group**



*Picture: The launch of CPEG, November 2006. From left to right: Richard Spring MP, Charles Hendry MP, Alan Duncan MP, Brian Binley MP, Mark Prisk MP.*

The Conservative Parliamentary Enterprise Group is a group of 135 Conservative MPs and 31 Conservative Peers. It campaigns in Westminster on behalf of small businesses and is chaired by Brian Binley MP. Sir David Mitchell, who founded a similar group in the late 1970s, is the Group's President.

The group has been set up to enable UK companies to remain competitive in an increasingly global, competitive world. The group is in constant contact with small and medium-sized businesses and the groups that represent them, in order to understand their concerns and thereby represent them as effectively as possible.

## **Appendix 2: Members of the Commission**

### **Brian Binley MP (Northampton South)**

Born in 1942, Brian is Chairman of BCC Marketing Services, a company he co-founded in 1988. In 1993 he co-founded a second company, Beechwood House Publishing Company Ltd, to produce and publish directories. Brian was elected MP in 2005. In 2006 he was appointed Chairman of the Conservative Campaign for Enterprise, a group which enjoys the backing of more than 130 Conservative MPs. He is also attached to the Shadow Front Bench team for the Department of Business Enterprise and Regulatory Reform and is a member of the DBERR Select Committee.

### **Philip Dunne MP (Ludlow)**

Philip Dunne became Member of Parliament for Ludlow in 2005. He is member of the Treasury Select Committee and the Public Accounts Committee. He has a 20 year career in business behind him. After reading Politics, Philosophy and Economics at Keble College, Oxford, he worked in investment banks in London, New York and Hong Kong. Philip also co-founded the bookshop company Ottakar's of which he was Chairman until it was acquired in 2006.

### **Rt Hon John Redwood MP (Wokingham)**

John Redwood has been the Member of Parliament for Wokingham since 1987. He served as Chief Policy Advisor to Margaret Thatcher and has been a front bench Minister for the former Department of Trade and Industry, and a member of the Cabinet as Secretary of State for Wales. He has been a director of NM Rothschild merchant bank and recently co-chaired the Economic Competitiveness Policy Group.

### **Nigel Evans MP (Ribble Valley)**

Nigel Evans became Member of Parliament for the Ribble Valley in 1992. His political career has included working as a Parliamentary Private Secretary and serving as Shadow Secretary of State for Wales. Having returned to the backbenches he currently chairs APPGs on Malaysia and Identity Fraud and is a member of the Culture, Media and Sport Select Committee. Nigel is interested in small business and owns a convenience store in Swansea which was established by his family in the 1930s.

### **Geoffrey Cox MP (Torridge & West Devon)**

Geoffrey Cox was elected Member of Parliament for Torridge and West Devon in 2005. After gaining a degree from Downing College, Cambridge, Geoffrey has been a barrister for 23 years and in 1992 founded his own barristers' chambers. He has successfully led for the defence in a number of high profile cases and has also been the standing counsel to the government of Mauritius. Geoffrey is a member of the Environment, Food and Rural Affairs Select Committee. Promoting the sustainability of local communities and the environment are among his high priorities as an MP.

### **Mr Paul Hobden MA DipArch(Edin) RIBA FRSA (architect and town-planner)**

Paul Hobden is a graduate of the University of Edinburgh where he studied architecture and urban design before undertaking postgraduate studies in planning and urban history. He is a member of the Royal Institute of British Architects and the Town and Country Planning Association and is also a Fellow of the Royal Society of Arts. Paul is Principal of Hobden Associates: Chartered Architects and Planning Consultants and a Director of George Hobden & Son Ltd and Hobden Projects Ltd and Chairman of Hobden Group. He is a former Chairman of First Architecture Group plc and President of the European Division of A Epstein International Inc and has served on the Board of the Milton Keynes and South Midlands Architecture and Built Environment Centre and the Council of the Northamptonshire Society of Architects. He has recently been undertaking research into urban evolution, at the University of Leicester, and is currently undertaking doctoral research into the aesthetic and social consequences of post-war planning policies, and strategic urban design, at University College London.

### **Kate Nicholls (Head of Communications) Association of Licensed Multiple Retailers**

Kate Nicholls has been Head of Communications for the Association of Licensed Multiple Retailers since 2002, the only national trade body dedicated to representing the interests of licensed companies. Members own or operate not only pubs and bars, but also restaurants, clubs and accommodation. Kate studied English at Fitzwilliam College, Cambridge and has a post-graduate diploma in competition law from Kings College London. After graduating in 1991, she worked as a researcher in the European Parliament and House of Commons for Caroline Jackson MP and Simon Coombs MP. In 1994 she moved to Whitbread, working as European Government Relations Manager in the Strategic Affairs. She moved to consultancy in 1997, initially working for one of the largest independent public affairs companies, before establishing her own successful company in 2000.

### **ACC Peter Davies, Lincolnshire Police, from Association of Chief Police Officers**

Peter Davies has a national representative role on security industry matters and a regional one on business crime. He is custodian of many traditional high streets in market towns and the city of Lincoln.

### **James Lowman, Chief Executive of the Association of Convenience Stores**

James was appointed Chief Executive of the ACS in November 2006, having risen through the public affairs department since he joined in 1997. At ACS he initially took responsibility for regulatory work and political representation of the sector but was appointed Public Affairs and Communications Manager in 2000 and then Public Affairs Director in 2006. He has headed a number of high profile political campaigns, including the referral of the grocery market to the Competition Commission, the successful opposition to Sunday Trading hours extension and the introduction of the No ID No Sale message relating to sales of alcohol to minors.

### **John Dean, Chief Executive of the British Shops and Stores Association**

John Dean is the Chief Executive of the British Shops and Stores Association. He ensures that the voice of its members is heard and acted upon by Government. This is achieved through both the medium of the British Retail Consortium and close liaison with other trade associations, together with a proactive PR campaign which

keeps the Association in the forefront of the Small and Medium Sized Enterprise Sector.

**David Ramsden, Chairman, Deregulate UK**

David Ramsden has been involved in retailing all his working life, from small shops owned by his family to large stores operated by the Kingfisher Group where he was head of Public Affairs. David is currently chair for the South West of England for the Federation of Small Businesses in the area of Policy. In his capacity as Chairman of Deregulate Ltd David has given evidence to a variety of Government bodies on the issues surrounding retailing.

**Clive Davenport, Policy Chairman, Trade and Industry, Federation of Small Business**

The FSB is the largest campaigning pressure group promoting and protecting the interests of the self-employed and owners of small firms. Formed in 1974, it now has over 205,000 members across 33 regions and 230 branches. On the member benefits side, it offers assistance and support 24 hours a day, while its lobbying arm - led by the Westminster Press and Parliamentary office - applies pressure on MPs, Government and Whitehall, lobbies politicians in their constituencies and puts the FSB viewpoint over to the media.

### **Appendix 3: List of Submissions received**

Alliance Boots  
AJP Management  
ASDA  
Ashburton Chamber of Commerce  
Association of Convenience Stores  
British Brands Group  
Billericary Chamber of Commerce  
British Council of Shopping Centres  
British Shops and Stores Association  
British Retail Consortium  
Cook, Mr Peter  
Copplestone Stores and PO  
CV One  
Federation of Master Builders  
Federation of Small Businesses  
Fitzpatrick, Mr Eamonn  
Forum of Private Business  
Friends of the Earth  
Frederick L Mabb Ltd  
Harker, Councillor Mimi  
Harper, Mr Peter  
Independent Retailers Confederation  
Institute of Place Management  
The Law Society  
L.N. Greenall (Holdings) Ltd  
Macey Chemists  
Musgrave Retail Partners GB  
National Association of Master Bakers  
National Federation of Sub Postmasters  
National Market Traders Federation  
Oliver Adams Ltd  
Peachey, Mr Richard  
Plant and Plant  
Primrose Hill Business Association  
Purdies Linens  
Quantock Orchard Caravan Park  
Rayleigh and District Chamber of Trade  
Royal Borough of Kensington and Chelsea  
Rural Shops Alliance  
Sainsbury's  
Shropshire Enterprise Partnership  
Tesco  
The Tobacco Alliance  
Timpson, Mr Richard  
Tipping, Mr David  
Town and Country Planning Association

The Commission would like to thank Dolphin Head Group Holdings PLC, Camberley, Surrey, who have kindly sponsored this report.

Front cover picture taken from [www.thisisbroken.com](http://www.thisisbroken.com)