

Gerard Burgess
New London Plan
GLA City Hall
London Plan Team
Post Point 18
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London SE1 2AA

Dear Gerard,

ACS Submission: Draft London Plan

ACS welcomes the opportunity to respond to the consultation on the Draft London Plan. ACS (the Association of Convenience Stores) represents 33,500 local shops across the country and 6,256 in London. ACS members include the Co-op, Nisa Retail, Spar UK and thousands of independent retailers. 78% of convenience retailers trade in secondary shopping locations, trading close to where people live in small format sites under 280 square metres¹. The Draft London Plan and its implementation is important to the future of the convenience sector and other retail businesses in London. We welcome the acknowledgement in the Draft Plan that local and neighbourhood shopping facilities need to be enhanced, especially the provision of convenience retail.

We welcome that the Draft London Plan focuses on the delivery of healthy high streets and food environments. Convenience stores play an integral role in the provision of food in local communities, but the range offered can vary greatly depending on the size and location of the store and the local demographic. Giving planners the task of determining what is a healthy food option or indeed “restrict unhealthy options” are complex challenges. The biggest product category by proportion of sales in a convenience store, on average, is chilled foods (17.2%), but convenience retailers also sell alcohol (14.3%), soft drinks (5.9%) and confectionery (5.9%)². Therefore, while we endorse the overall principle of encouraging healthy food environment we think this is difficult for planners to meaningfully deliver at a local level with an increasingly diverse range of food retail and service businesses demanded by consumers.

We believe that a plan led system, developed in consultation with local communities, is the best approach to shaping local communities and the mix of retail provision. We welcome that the Draft London plan specifically states: *“support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel”*. This aligns with growing consumer trends towards shopping, local and often for groceries. Convenience stores are central to meeting this demand as 53% of our customers come from within ¼ mile of the store, with 56% of customers travelling to shops on foot³.

We endorse the Draft London Plan retaining a strong ‘Town Centre First’ policy and believe this is integral for sustaining the vitality and viability of town centres and secondary shopping parades. It is important that the sequential test is applied as a gateway test to large out of town and edge of town retail developments. ACS’ analysis of the National Planning Policy Framework, after it was first introduced in 2012, showed that the sequential test was not being applied appropriately resulting 76% of retail floorspace being delivered out of town –

¹ ACS Local Shop Report 2017

² ACS Local Shop Report 2017

³ ACS Local Shop Report 2017

the same mistakes should be avoided in London. The sequential test in the Draft London Plan must be strong enough to ensure that planners have the power to get developers to consider sequential preferable sites in centres even if this requires developers to change the size and format of their developments.

We welcome the suggestion that each town centre should have a Town Centre Strategy produced in partnership at local level. We would encourage these town centre strategies to also consider the hierarchy of local centres and the relation between primary and secondary shopping areas. It is often the case that policy makers forget about the important role of local shop parades in secondary areas, failure to monitor provision of services on these parades can result in costumers losing access to be important retail businesses and services.

ACS is open to engaging with the Draft London Plan team on the relevant sections of the London Plan. For more information on this submission please contact steve.dowling@acs.org.uk or contact the ACS public affairs team on 01252 515001. A copy of ACS' London Local Shop Report data is enclosed for you reference.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Lowman', with a long horizontal flourish extending to the right.

James Lowman
Chief Executive