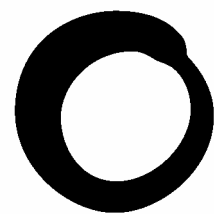


March 2004

# Consultation response



**Friends of  
the Earth**

## Draft Planning Policy Statement Six: Planning for Town Centres.

### Summary of Key Points from Friends of the Earth's Response.

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## **Introduction**

**The draft Planning Policy Statement 6 (PPS6) was issued by the Office of the Deputy Prime Minister in December 2003 alongside a commitment from Government to the regeneration of town and city centres. PPS6 will replace Planning Policy Guidance 6 which has in place since 1996.**

Friends of the Earth considers that the existing PPG 6 has made a significant contribution to reversing the decline of town centres and encouraging renewed investment in the UK's high streets. We broadly welcome the restatement of these principles in the draft PPS 6. However, there are areas where we consider that the draft policy needs to be strengthened and areas of contradiction with these principles within the draft which must be addressed.

## **Key points**

The central deficiency in the current draft is a failure to provide clear guidance to local authorities on the need to restrain large format stores. Instead it actively encourages the provision of large format edge-of-centre sites. This is a direct bias of retail policy in favour of one group of retailers and fails to recognise that the impact of such stores can be equally damaging to the vibrancy and diversity of a retail centre whether they are located out-of-town or edge-of-town. By favouring large retailers in this way PPS6 is putting the needs and views of a particular business sector over and above those of the wider community and contradicting the commitments to genuine community involvement in shaping the retail future of their areas.

We welcome the commitment in PPS 6 for community involvement in the preparation of retail strategy in the Local Development Framework. It should be an absolutely central policy objective that the future shape of villages, towns and city centres be resolved in the civic realm by the active participation of the community. It should not be resolved, as has often been the case, by the investment strategies of large multiple retailers.

We strongly welcome the encouragement for creating retail size limits. In our view PPS 6 should encompass a presumption against any retail development facility larger than 3000 square metres. In addition local authorities should set much tighter floor space caps to suit their specific localised needs. The idea of a retail floorspace cap is well developed throughout the rest of Europe.

PPS 6 should explore more clearly how the desire for increased retail productivity can be matched by the promotion of broad diversity and social inclusion. PPS 6 suggests that retail productivity as represented by economies of scale is an important Government objective. Friends of the Earth is concerned that such an extremely narrow view of productivity should be used. A productivity assessment based purely on financial performance will not necessarily allow local authorities to make decisions that would benefit local economies and local communities; improved financial productivity is largely irrelevant if the returns are simply exported out of the locality. A wider approach to productivity than purely financial performance would be a much more useful tool for local decision-making and could cover issues such as economic returns to the local community, production of improved social capital (community cohesion and addressing social exclusion) and production of enhanced public capital and public goods.

PPS 6 should recognise more forcibly the very significant decline of small to medium scale retailing, the consequent negative effect on the diversity and viability of many village, town and city centres, and the role of retail planning policy in halting and reversing this trend. Data

from the DTI (Business Start-Ups and Closures) shows that over the last decade (up to 2002) some 30,000 independent food, beverage and tobacco retailers were lost. The knock on effect on other small businesses is apparent, with a 10 per cent drop in wholesale suppliers and a nearly 12 per cent drop in small-scale food manufacturers over the same period.

Friends of the Earth is extremely concerned about the introduction into PPS 6 of the concept of the managed decline of retail areas. Such decline is clearly happening and is related to a much broader agenda of social decline in particular localities. However, recognising that such a decline is a reality does not imply that its continuation should be regarded as inevitable or acceptable. The emphasis in PPS 6 should not be on managing decline but on identifying and rolling back the drivers of decline.

PPS 6 recognises the important role of markets and local food initiatives but the policy as drafted focuses on the retention and enhancement of such facilities. Friends of the Earth believes it should provide more emphatic encouragement to Local Authorities to take a favourable and proactive approach to local food retailing including the provision of new farmers' market facilities. A more diverse retail sector can offer access to the market for small and medium-sized rural businesses. The policy should encourage the provision of new facilities wherever possible.

PPS 6 needs to recognise that in order for town centres to achieve their full potential and continually improve as retail destinations it will be appropriate and necessary for planning authorities to adopt a pro-active approach in enhancing the vitality and viability of their centre(s).

We welcome the fact that meeting the needs of the socially excluded is a specific aim of the draft, but are concerned that this does not translate into a clearer proactive policy to ensure the retention and provision of accessible local shops. We are not convinced that large format stores are the best way to provide access to healthy food, especially if the opening of a large store results in the loss of the last remaining local shops in a deprived neighbourhood. In addition, such an approach completely fails to address the needs of the less affluent and less mobile who do not live within the immediate vicinity of the superstore.

These principles also need to be applied to areas of new development, especially in areas of major housing expansion such as Thames Gateway and Milton Keynes. The proposed growth areas include provision for affordable housing so it follows that adequate access to a range of retail outlets must be provided for those without access to a car. Access to corner shops and neighbourhood retail centres should therefore be a vital part of the master plan of any major housing development. If this does not happen social exclusion will be built into the growth areas from the outset.

PPS 6 must be clear that 'regenerative need' should not be used to make an exception to policy in favour of out-of-town supermarkets. Assuming that 'regenerative needs' are related to social and economic aims, we would argue that both are better met by local shops than out-of-town or even edge-of-town supermarkets.

Friends of the Earth is concerned that the draft PPS 6 takes a weaker approach than PPG 6 to discouraging car based shopping.

## **Conclusion**

In summary we consider that in order to encourage a more diverse, equitable and sustainable pattern of retailing, the new PPS 6 must strengthen existing policy to restrict out-of-town retail development and must also take a much more proactive stance on encouraging local

shops and local food initiatives. Friends of the Earth is very concerned by the policy bias towards large format stores on edge of town locations in the new PPS 6. This could only benefit the major multiple retailers and would be a disaster for town centres and local communities. Such a move would soon eradicate the achievements of PPG6 over the last seven years.