



Scottish Planning Policy SPP8 Town Centres: Consultation

Response from the Federation of Small Businesses in Scotland

1. Introduction

- 1.1 The Federation of Small Businesses is Scotland's largest direct-member business organisation, representing 18,000 members. The FSB campaigns for an economic and social environment which allows small businesses to prosper. Many business people are regularly involved in the planning system, submitting applications for a variety of measures aimed at growing or diversifying businesses. Accordingly, we take a strong interest in developments in planning policy in Scotland and welcome the opportunity to comment on this latest development.
- 1.2 The Federation welcomes this update on planning policy for town centres at a time when many small, independent retailers increasingly face fierce competition from larger companies as well as out-of-town developments. On balance, whilst this draft acknowledges the diverse and fast changing nature of retail sector there is little discussion about which approach is appropriate for different scales and types of retail development. For example, the resources at the disposal of a small, independent retail applicant are not comparable to those of a national, "chain" retailer and any policy on retailing should take account of this difference. We accept that planning policy is not there to protect competitive interests but nor is it right that the policy disadvantages certain sectors.
- 1.3 We welcome the acknowledgement in the draft that a 'town centre' encompasses a number of services and uses and is certainly more than just retailing. It is important to consider what people regard as the necessary components of a town centre when considering any future definitions. We note that the difficulty in defining a town centre was a failing of NPPG8 which has led to a number of controversial planning cases.
- 1.4 We accept that not all retailing can be accommodated in the town centre and it is appropriate that this SPP also covers these developments; however, we remain concerned that the definition of 'complementary' to town centres is open to interpretation.

Policy Context

- 2.1 The Federation fully supports the statement that "vibrant, thriving town centres should be the focus for communities." It is our impression that the underlying theme of this document is to encourage the prioritisation of development in town centres. The FSB supports this but remains concerned that by ensuring that the SPP allows sufficient local flexibility, it also means that many departures from the stated aim will be permissible. Whilst we agree that additional centres may sometimes be complementary to town centres, we feel that more guidance is required to determine whether or not the impact of these developments is 'acceptable'.
- 2.2 We note the comments regarding the increasingly diverse retail sector and the need for planning policy to remain relevant in light of ongoing change but we would add that it is

also important to consider the impact of this fast pace of change on small traders and their need to adapt and remain competitive. As highlighted above, we do not believe that planning policy should be used to artificially alter retail trends but it is important that it recognises the reality of different types of retailers in and around town centres.

- 2.3 Whilst the issue of accessibility is discussed in more detail later in this response, we must challenge the subtle suggestion that car use is always 'bad' and avoidable. Whilst this may be easier to implement in larger town or city centres it may not always be an appropriate objective for small towns (particularly rural areas) where there are less alternative modes of transport. We understand the importance of encouraging the provision of alternatives to car use but supporting "a choice of modes of transport" surely does not mean discouraging the use of one particular mode (which is how many small businesses believe policies designed to provide alternatives to car transport have been implemented).

Network of Centres

- 3.1 We support the development of a network of centres and the importance of investment in town centres; however, we feel that more guidance might be necessary on determining whether or not investment in other centres will undermine town centres as there is likely to be a significant amount of conflicting evidence on this point.
- 3.2 We are particularly concerned about the suggestion that centres which are deemed to be deficient and which show 'sustained decline' should be somehow 'written off'. We appreciate that this is not the intention but think that there should be more focus on working with traders to identify and reverse decline in failing centres before any decisions are taken to invest in new centres.

Focusing Development in Town Centres

- 4.1 The Federation agrees that the sequential approach is sensible but this approach should consider the role of small retail businesses outwith the town centre which do not fit easily with either the edge-of-centre or out-of-centre definitions. These will often be small-scale applications for single units which will, for example, never be able to attract public transport routes as larger developments can.
- 4.2 Again, we remain concerned that the justification for approving out-of-centre applications might not be strict enough. There must be robust examination of any evidence which seeks to demonstrate that there will be no any impact on the vitality and viability of town centres.
- 4.3 We agree that certain types of retail are best-suited to locations outside the town centre; however, small businesses are concerned that once established, these units can expand or diversify in a way that threatens the viability of town centres. We therefore fully support the suggestion that planning conditions can be used to restrict the sale of certain goods. This could include, for example; cafes, newsagents, small electronic devices, clothes and pharmacies.

Improving Town Centres

- 5.1 Whilst the Federation does not agree with the principle of Business Improvement Districts (BIDs) we agree that town centre strategies are crucial to the retention of vibrant town centres. Strategies must be developed in full partnership with the local business community.

Providing an Attractive and Safe Environment

- 6.1 Businesses can be affected by the impact of poor design, particularly where this has harmed the reputation of the town centre and the number of shoppers has declined so we are aware of the benefits of good design but this should be balanced with the practicalities of access in and around town centres including, for example, delivery access to pedestrianised areas. Indeed, throughout this SPP there is little reference to what the businesses themselves, who are after all key to ensuring the vitality of the town centre, need to see reflected in planning policy for town centres. Often this will take the form of guidance on very practical issues.

Enhancing Accessibility

- 7.1 Research carried out by the Scottish Executive into the effectiveness of NPPG8 discusses a variety of factors surrounding what the public view as desirable features in a town centre and other shopping areas. This research points out that people value convenient access and dislike poor car parking in town centres. It also points out that there is a need to address a level playing-field for parking control well as parking allowances, between central and decentralised locations. The research also showed that 82% of all car trips in town centres are made at off-peak times.
- 7.2 Increasingly small retailers are pushed to the edges of the town centre (rather than necessarily being edge-of-centre) and the provision of on-street, short-stay parking is crucial if access to these shops is to be convenient for the public. These points do not appear to be reflected in the draft SPP which is disappointing and we would suggest that some reference to on-street parking is required. This is the reality for many towns in Scotland and if this SPP is to be relevant then it must recognise the needs of all retailers in and around town centres.
- 7.3 The Federation responded to the recent consultation on the development of SPP17 and we made similar points in that response.

Monitoring and Review

- 8.1 The study of NPPG8 clearly established the need for ongoing monitoring in a sector which is constantly evolving and also where local circumstances may change. It is important that local businesses are kept up to date with this monitoring and any implications which may arise for town centre strategies.