

# THE INDEPENDENT RETAILERS CONFEDERATION

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**Chairman:**  
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24<sup>th</sup> July 2006

Dear Ms Barker,

## **Review of Land Use Planning Interim Report**

I am writing to you as Chairman of the Independent Retailers Confederation (IRC), an organisation representing the interests of over one hundred and fifty thousand retailers. We are very keen to be engaged with your review and would like to respond to issues raised in the interim report.

We believe that Planning Policy Statement 6 is absolutely vital to promoting sustainable competition in the UK grocery market. The period before the introduction of Planning Policy Guidance 6 saw significant closure of independent retail businesses and the consolidation that has taken place since 1994 makes planning controls on retail development even more important.

It is our grave concern that although consolidation continues in spite of PPS6, any relaxation would benefit only the very largest businesses. In many communities around the country, it is clear that more retail development would have a negative and long lasting impact on the local economy. The record of over development by supermarkets in particular is closure of competitors and the loss of choice.

We do not agree with those that argue that lessening planning restrictions would lead to new entrants into supermarket retailing. In a market that is already one of the most highly concentrated in the world, planning is not the barrier to entry. Loosening planning restrictions would result in more outlets for the bigger businesses and an increase in their share of a market that is already worryingly concentrated.

We understand the frustration of those that see the application procedure as a check on development. However we are absolutely clear that in many cases, the reason

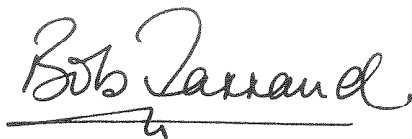
that the process seems so long winded is because large developers refuse to take no for an answer. This willingness to use financial dominance to override the democratic will of a community is a function of the dominant position that the largest UK retailers have.

We agree that planning is not only about economic and competitive issues, and that planning serves a number of other community interests. We would therefore be very concerned that the findings of this review would serve to undermine rather than invigorate the engagement of local communities in decision making of this nature.

The IRC believes in a modern planning system that is easy to understand and encourages growth. We also believe in the importance of high street retailing to the future of sustainable retail growth. We therefore believe that any reforms should not remove the fundamental principles of PPS6.

We ask that we are included in any further discussion or consultation on these important issues.

Yours sincerely,

A handwritten signature in black ink that reads "Bob Farrand". The signature is written in a cursive style and is underlined with a horizontal line.

Bob Farrand  
Chairman

Current membership organisations are:

- National Federation of Retail Newsagents
- National Federation of Meat and Food Traders
- National Association of Master Bakers
- Guild of Fine Food Retailers
- Rural Shops Alliance
- Association of Convenience Stores
- Association of Cycle Traders
- National Federation of Fishmongers
- Retail Enterprise Network at Manchester Metropolitan University
- British Shops and Stores Association
- Scottish Federation of Meat Traders
- National Market Traders Federation
- Horticultural Trades Association
- Pet Care Trust
- British Florists Association