London Sustainable Development Commission (84)   Matter: 4F

Policies 4.7 & 4.8

Question b: Are the forecast requirements for comparison retailing soundly based? Should disaggregated figures be provided to sub-regions, Boroughs or even some categories of centres?

1. Argument and Evidence

1.1 The LSDC is of the view that although the forecast requirements for comparison goods retail floor space may be correct if one considers a "business as usual scenario" there should not be a presumption of growth of 1.8 to 2.9 million sq m by 2031(Para 4.38) if London is to genuinely play its part in averting dangerous climate change and unsustainable use of resources.

1.2 Our submission is based on information from recent research carried out by LSDC and BioRegional "Capital Consumption: the transition to sustainable consumption and production in London", published in November 2009 (Core Document RD39).

1.3 This submission is in line with the Mayor's commitment to a low carbon future and reducing carbon intensity as set out in paragraph 4.6 of the Draft London Plan and the UK Sustainable Development Strategy (Securing the Future, delivering UK sustainable development strategy, HM Government, March 2005, Core Document RD43: Chapter 3 One Planet Economy, sustainable consumption and production) and many other policies.

1.4 The Capital Consumption report models one way in which London could reduce its consumption based CO_2 emissions by the necessary levels to avert dangerous climate change as recommended by the Committee on Climate Change and in line with regional and national policies. The report makes choices from available measures and other choices could be made as long as the total required CO_2 emissions savings are achieved.

1.5 The modelling in the Capital Consumption report apportions the necessary carbon reductions across all sectors where Londoners' carbon emissions arise. Consumer goods account for 12% of Londoners' consumption-based CO_2 emissions. To achieve the necessary reductions from the consumer goods sector the modellers were forced to conclude that consumers will need to purchase fewer but longer lasting and repairable goods and that this could account for 30% of the necessary CO_2 emissions savings in this sector or 3.6% of overall CO_2 savings (pages 23-25 and 49-51 of Capital Consumption). The modelling includes realistic and achievable 25-50% reductions in consumption of electronic goods, clothing, floor coverings and jewellery. This need not affect London's economy as the price of goods could be increased commensurate with their longer life and lower embodied carbon service based activities such as hire, second hand or repair shops which could create new economic opportunities.

1.6 The Capital Consumption report further notes that the built infrastructure impact which accounts for 9% of Londoners' consumption based CO_2 emissions also needs to be reduced. The Capital Consumption report models reductions in built infrastructure (pages 26-28 and 55) including a 50% reduction in building of new retail floor space in order to achieve the necessary CO_2 emissions reductions. The impact of this on London's economy should be mitigated as the modelling also included a doubling of built infrastructure activity in renewable energy and rail infrastructure needed to create a sustainable London.

2. Conclusion on Policy (question b)

2.1 LSDC considers that the Panel should recommend that yes, disaggregated figures should be provided to decision makers at the appropriate planning levels. We recommend that this information include, by area and for London as a whole:

- a benchmark and breakdown of current retail floor space;

- an explanation of why under “business as usual” economic scenarios it might be seen as necessary to increase retail space;

- information concerning the revised requirement for retail space if London is to practice sustainable consumption and production and achieve the necessary reductions of Londoners consumption based CO_2 emissions as set out above and in the Capital Consumption report. For example this could include at least a 50% reduction in the construction of new retail floor space.

Question d: Is there any need to refer to convenience retailing? and
Question f: Is the potential of smaller district and neighbourhood centres sufficiently recognised? And that of existing out of centre provision?

3. Argument and Evidence

3.1 The LSDC is of the view that it is important to retain and expand the reference to convenience retailing and the potential of smaller district neighbourhoods in the London Plan (Policy 4.8 B).

3.2 Our submission is based on information provided from two of LSDC’s current areas of work:

- Capital Consumption: the transition to sustainable consumption and production in London; published with BioRegional November 2009 (Core Document RD39).

- London Leaders campaign started in 2008 and now in its third year of operation (Core Document RD40).

3.3 Londoners’ personal transport impacts account for 20% of London’s consumption based CO_2 emissions as set out in the Capital Consumption report (pages 33 and 67-69). There is a need to support diverse local shops within easy walking distance of Londoners' homes in order to reduce the need to drive a car for everyday shopping, especially in lower density outer London boroughs. This is in line with Policy 4.8 Bb and the "lifetime neighbourhoods" criteria as set out in Policy 7.1F and G. However the suitability of the range of convenience retail available in neighbourhoods needs to be considered and planned for because convenience retailing in many neighbourhoods is expensive and has only a limited range of healthy produce.

3.4 The Capital Consumption report also considers the impact of Londoners' food consumption (pages 21 – 23 and 47- 48) which accounts for 10% of Londoners consumption based CO_2 emissions and 19% of greenhouse gas emissions. Retailers could take a variety of measures to achieve 70% reduction in post farm gate emissions. Two measures that are of most relevance to the London Plan are;

- a reduction in food waste which can be supported by offering "just in time" shopping for Londoners at local convenience retailers which may reduce the food waste associated with one weekly shop.

- improved freight efficiencies and reduced transportation of food.

3.5 The London Leaders campaign has included a number of relevant initiatives including Eat to Live. These initiatives have shown what can be achieved through local community enterprises, and the potential for developing London wide networks of suppliers and retailers. LSDC intends to build on this experience to take forward further initiatives of this kind.

3.6 In addition, it is becoming clear that the issue of more local food supply is beginning to be taken into account in planning decisions. At Sheringham, the local planning authority has granted permission (in the context of other less sustainable aspects of the scheme) for a new convenience store that will be sourcing food more locally through its association with the

Greenhouse Community Project and Norfolk Food Academy (Core Document RD41).

3.7 In this context it would be useful to consider whether Policy 4.8 B could be strengthened to address the opportunities for a more coherent approach to convenience retailing as part of delivering a low carbon resource efficient retail sector for London.

4. Conclusion on Policy 4.8B (questions d and f)

4.1 Our view is that a strong strategic policy in the London Plan on convenience retailing is essential to realise the opportunities for improving sustainability and quality of life in London. LSDC proposes that the Panel recommends an amendment to one sub-section and five new sub sections in Policy 4.8 B. Firstly, at the end of existing sub section c:

c “…specialist shopping*” ADD “within ten minutes walk*.”

In addition, in Policy 4.8 B after existing sub section e we recommend the following new sub-sections:

f *consider the likely impact of proposed new large retailers on the viability of convenience retailers in neighbouring areas as part of the planning process and ensure that convenience retailers are not adversely affected.*

g *develop a local policy that stipulates that new convenience stores should undertake to reduce distances involved in supply networks where feasible and viable*.

h *identify with their local communities the opportunities for local community enterprises to provide inputs to the local food supply chain (see also Policy 7.1).*

i *identify with their local communities the opportunity to develop a network of sustainable convenience retailing to enable local people to buy keenly priced fresh produce and other daily* *essentials (and access to other local facilities such as free cash withdrawals) within an ideal ten minute walking distance of their homes*.

j *identify sites related to potential retail development locations for the establishment of local distribution centres that could accommodate the needs of suppliers in London and the wider area.*