

## **Shops to Housing:**

The forthcoming proposals to provide a freedom to change from shops to housing, whilst motivated by the existence of vacant shops in many parts of the country, especially in secondary or tertiary shopping areas, unfortunately cannot be limited either to such areas or to vacant units.

The situation, particularly in much of London and other areas with a large differentials in values between shops and housing, is that even if shops are viable, this differential in values between shops and housing means that there would still be a huge windfall gain to be achieved by converting all corner shops, many shops in local parades and neighbourhood centres and a substantial change to the outer edges of district centres. This would be fairly devastating for the distribution of convenience shops and local services, access to day-to-day shopping needs within easy walking distance for local communities, but more particularly to the continuing vitality and viability of local centres. Being able to control the release of local shops to other uses is absolutely critical to maintaining vital and viable local centres.

A possible outcome could be even larger “under-served markets” in our inner city areas, resulting in increased social exclusion, as well as villages with no shops.

### **Conflict with the NPPF**

This would be in direct conflict with the NPPF, particularly:

in rural areas/villages (para 28, 4th bullet),

maintaining a balance of uses (para 37),

promoting healthy communities (paras 69/70), by promoting strong neighbourhood centres and active street frontages,

planning positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, pubs and places of worship) and other local services to enhance the sustainability of communities and residential environments;

guarding against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;

ensuring that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and

ensuring an integrated approach to considering the location of housing, economic uses and community facilities and services.

### **How to avoid a bad outcome**

To enable local/neighbourhood centres to continue to provide a focus for local communities as well as to provide a range of their day-to-day needs, it will be absolutely essential to retain the existing planning powers to manage both the amount and the mix of uses in local centres. It will also be essential for neighbourhood planning that communities can shape their local centres and maintain their ability to meet the daily needs of their community.

This would suggest:

**exempting communities/areas/local centres where a blanket relaxation of change of use from shops to housing could destroy the network of neighbourhood centres** – this would certainly be necessary for neighbourhood centres across London, as well as villages;

**limiting the proposals to premises currently vacant;** or failing that

**limiting the proposals to premises last used as a shop at the point when the SI is issued** – ie excluding A2, A3, A4 and A5 uses which could otherwise be converted to a shop without consent and then converted to housing without consent. Even this would make post offices and pharmacies at risk.

Given the strong conflict with central themes of the Government's planning policy, namely ensuring the vitality of town centres, supporting a prosperous rural economy, and promoting healthy communities, it will be essential to emphasise greater use of positive planning to manage the change within existing centres rather than introduce an across-the-board proposal that could decimate local, neighbourhood centres, local parades and corner shops in areas where housing values greatly exceed those for small shops. This suggests a more disaggregated approach to impact assessment, especially recognising the very different situation in London, major cities, market towns and villages.

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