

# Building on Success

## London's Town Centres



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**LONDON**  
**COUNCILS**



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# 1. Introduction

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This short report revisits and builds on some of the recommendations made in London Councils' 2013 report: *Streets Ahead? Putting High Streets at the Heart of Local Economic Growth*. Since that report was published there has been some positive developments for town centres in London, including changes made to the Use Class Order (UCO) system that gives greater local control over clusters of betting shops, increased support for business improvement districts (BIDs), the proposed devolution of Sunday trading hours to London government and ongoing investment from the Mayor of London into local high streets and town centres.

In addition, the move of Public Health from the NHS to local government in April 2013 provides opportunities to create healthier high streets and town centres.

However, in some areas we have seen little movement towards the types of policy that would support local authorities to drive local economic growth and improve health outcomes in their town centres. In particular London boroughs do not have enough control over rate reliefs, they do not have adequate tools to incentivise landlords to animate vacant units, they are not able to fully protect pubs and other assets of local importance and they need more power to license the types of activities that take place in betting shops, fast food, alcohol and payday loan outlets.

And unfortunately, in yet other areas, we have seen a trend of centralisation that has removed powers from local government and adversely impacted on local economic growth in town centres. This includes the creation of permitted development rights for office to residential conversions since May 2013 and, more recently, a loss of borough power to protect retail units.

This report sets out a series of recommendations that would enable and incentivise local authorities to take leadership over the economies and place-making of their town centres. And it is with local authorities that this role should sit. One of the unifying features of local town centres is that they are all diverse. As set out in *Streets Ahead*, London Councils still believes that a variety of solutions are needed to meet the challenges created by this diversity, and that power should therefore be given to local government to design interventions that respond to local opportunities and challenges as they arise.

The economic success of London's various local centres and high streets will be reliant on different factors in different locations. This makes it difficult to create a centralised policy response to the challenges that high streets face. However, providing boroughs and local stakeholders with the tools they need to respond to the differing circumstances of their local town centres will bring about positive outcomes for the capital.

This report outlines a number of recommendations to government, the Greater London Authority (GLA) and other agencies. However the key recommendations are:

- Provide boroughs with the planning tools they need to create high streets that work for local businesses and local people. Particularly the government should remove permitted development rights that allow office to residential conversions without planning permission.
- The government should provide fiscal devolution in the form of a full business rate retention scheme. This would incentivise and enable boroughs to invest in economic development as they would receive the benefits of their investment.
- The GLA should continue to strategically invest in high streets and workspaces, working closely with London's boroughs to understand their needs and priorities.



## 2. Challenges for high streets

The case for London's town centres has been well made.

The Mayor's *Action for High Streets*<sup>1</sup> sets out the economic, social and latent potential of town centres. Town centres remain a locus for jobs, civic institutions, cultural activities and social mixing.

Their importance is recognised by the London boroughs, the Mayor, London Councils and the London Enterprise Panel. Further evidence on the economic importance of high streets is contained in *Streets Ahead*.

There are a number of challenges that high streets continue to face:

### Restructuring of retail

Historic trends such as growth of out of centre provision, supermarkets becoming more important for comparison shopping and the growth of online shopping have led to pressures on traditional high street retailing<sup>2</sup>.

- The Association of Town and City Management identified that footfall across the UK's town and city centres has suffered sustained year on year decline since the beginning of economic difficulties in 2008<sup>3</sup>. Although the picture has improved in recent times footfall has not reached its previous levels.
- Although 24 of the 35 major centres in London have a vacancy rate below the current UK average, a number

of centres have a vacancy rate significantly above the UK average.

- 20 of London's district centres have vacancy rates that are significantly higher than the UK average.
- Experian predicts that in the period from 2014-18, growth in retail sales will be weaker than during the past decade<sup>4</sup>.

This confirms wider (pre-recession) structural changes to consumption patterns away from the traditional high street and into other types of commerce. The restructuring of retail has a number of impacts on the high street, including less income for traders and an increase in empty units.

### Surplus/wrong type of office space

As the need for retail space changes, town centres will increasingly need to diversify and use space differently. For some town centres this will mean increasing workspace. However in some parts of London there are decreasing longer term demands for back office functions. This is combined with technology driven changes in working practices that increase the utilisation of existing floorspace.

As such in some parts of London there is surplus or inappropriate office space, often located in and around town centres.

This is not the case with all town centres and centre by centre solutions need to be considered.

High streets can provide opportunities to

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develop affordable and flexible workspace used by small and medium enterprises (SMEs). The LEP's report *Accommodating Growth in Town Centres* found that 'Low Threshold Enterprise Space (the type of space often used by SMEs) is an important component on the London economy. It provides opportunities for jobs, growth and services that would not otherwise be supplied or would be provided from outside of London's boundaries'.

However,

- Research shows that while many SMEs prefer short or flexible tenure, developers and investors traditionally have been reluctant to provide such space, because of risk aversion and institutional factors.
- The kind of space SMEs use (often low cost, low quality) is often redeveloped into a higher value use at the end of its economic life without provision of like for like space. This leads to high demand and low supply, driving up the cost and leading to lack of availability.

## Uninspiring town centre experience

Many town centres lack a wider cultural, social, or civic offer that can bring vitality to the high street. Too many centres have high concentrations of fast food, alcohol, betting shops and payday loan outlets with few, if any healthier options. Many may also offer a poor qualitative experience, with a lack of variety and poor service, in challenging or less-than-attractive physical environments.

Town centres are expected to be experiential, offering leisure, culture and service based activities. As a result town centres increasingly need to be curated and local plans need to consider how they will meet this need in the future. Boroughs are growing their expertise in this area but with local budgets coming under pressure, non-statutory services such as economic development and culture are being squeezed.

*"If you asked people 20 years ago why they came into the city, they would have said it was to shop. But if you ask them today, they would say it was because they wanted 'to go into town'."*

**Architect and urbanist Jan Ghel**



# 3. Solutions and recommendations

There are four solutions that will help town centres in London to continue growing<sup>2</sup>:

1. **Encourage a more focused, curated and diverse town centre offer that provides a positive consumer experience and healthy options for customers.**
2. **Create characterful workspace that is designed to a specification and price to meet the needs of 21st century SMEs in a World City economy.**
3. **Reinforce the character and distinctiveness of town centres within London's network.**
4. **Foster a vibrant cultural, civic and well-being offer within its town centres as the heart of community life.**

The following section outlines the recommendations that can help deliver these solutions:

## **Encourage a more focused, curated and diverse town centre offer, which provides a positive and healthy consumer experience**

Local authorities should be provided with fiscal tools that incentivise and enable them to curate their retail centres to encourage footfall and spend. The current business rates system does not provide adequate rewards for local authorities and they are not incentivised to invest limited resources in consumer experience.

To support boroughs to encourage a more focussed, curated and diverse retail and

service offer, London Councils welcomes the Chancellor's recent announcement that local authorities will retain one hundred per cent of business rates by 2020. As it stands the growth incentive within the retention system is weak, as boroughs only retain 30 per cent of any overall growth, and growth is particularly hindered by the impact of business rates appeals. More importantly with regard to regeneration, because the scheme only rewards physical growth, boroughs do not benefit from the increased value of local businesses resulting from improvements made by boroughs to the public realm.

While the long term reforms are therefore welcome, there are some immediate short term changes that government can implement to incentivise local authorities to improve their local high streets:

- The government should **scrap mandatory reliefs and provide boroughs with the local discretion** to set their own reliefs. This could provide circa £650 million a year to London boroughs to support the growth of certain types of businesses (for example cafes, arts and culture spaces, workspace, business promoting healthy lifestyles or civic uses) in town centres and ultimately a more focussed, curated and diverse retail and service offer.
- The government makes **empty property and reoccupation relief discretionary**. Boroughs should have more control over what type of business can access these reliefs. This would allow boroughs to incentivise occupation of vacant units beyond retail.
- **Create an 'Empty Shops Premium'** – This would work in a similar way

to the 'Empty Homes Premium', so that if a business property in a town centre is vacant for more than 18 months landlords have to pay 150 per cent business rate. This would create 'use it or pay for it' system that would empower boroughs to better curate the consumer experience of their high street by animating vacant units. It would be important that this tool is used in a fair and proportionate way. To ensure this tool is only used for landlords that are keeping units vacant on purpose or through inactivity (rather than those they are trying to get a tenant but have been unable to secure one) there would need be safeguards in place, for example evidence of attempted communication with the landlord and evidence of demand for business units on the high street in question. This tool should be used to encourage more businesses onto the high street rather than as a source of income for local authorities. Local authorities could consider some form of brokerage to match new businesses to vacant units. Failure to engage in this service and 18 months of vacancy could trigger the Empty Shops Premium for landlords.

- **Create a business rate grace period for new businesses** looking to take on previously empty properties. Businesses would be able delay paying the first three months of their business rates and pay the rest split over the remaining part of the year. This would provide a lower risk entry point when starting up a business. The business rate grace period should be offered at local authority discretion.

- The government should **devolve responsibility and funding to develop, expand and maintain the London Growth Hub** for the next five years. This would become the flagship signposting tool in London for all business support. The GLA should ensure this tool signposts support specifically for existing and start-up high street businesses.



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## Create characterful workspace designed to a specification and price that meets the needs of 21st century SMEs in a World City economy

Affordable and flexible workspace<sup>10</sup> and the businesses that occupy this type of space add value to the London economy over and above their commercial value<sup>11</sup>. There are benefits for both the businesses in the workspace and for the surrounding local economy in which they are located, including in many cases high streets and town centres. The benefits include, being close to workers and markets, reducing the need for travel (and in turn the congestion and environmental costs of provision), the provision of jobs and the ability for workers to spend money in other local businesses. Affordable and flexible workspace increases diversity and helps to keep town centres thriving. Local authorities should be provided with the tools to encourage this type of workspace. However there are a number of challenges including affordability, availability of appropriate space and adequate broadband connectivity that might limit the number of workspaces that locate in town centres.

To support local authorities to encourage more workspace in their town centres London Councils recommends:

- **Continued strategic investment in high streets and work spaces.** The GLA has made consistent and strategic investments in London's high streets. The Outer London Fund, Mayor's Regeneration Fund and High Streets Fund are all welcome resources that support boroughs to continue working in and diversifying their high streets

and town centres. We would like to see continued Mayoral investment in town centres and workspace, with a continued strategic link between the two. However we would like the GLA to consider the lessons learnt in relation to the LEP New Homes Bonus Programme administration process and given borough expertise in delivering these types of projects, consider where processes could be streamlined. London Councils believes that as much of the funding as possible should be targeted towards projects and not administration and therefore the application, monitoring and reporting processes should be revisited and slimmed down. London Councils is happy to work with the GLA to jointly design these processes.

- **Give boroughs the power to extend reoccupation relief beyond retail** i.e. to include workspace, civic, community or cultural uses. Reoccupation relief for retail means that the government reimburses local authorities that use their discretionary relief (50% relief) for units that were previously vacant being taken on by a use classed as retail in the UCO system. By providing local discretion about how this relief could be administered local authorities would have more of an incentive to encourage workspace (and other uses, such as arts, culture, community or civic) into their town centres.
- The GLA undertake research to **develop a profile of high street businesses (retail, workspace and other) demand for broadband infrastructure needs and if needed make recommendations on how to increase supply in these areas.** Broadband is now considered the

fourth utility. However some areas have poor supply and in some cases retailers are not harnessing the full opportunities presented by greater connectivity. Despite the Mayor's broadband voucher scheme, restrictions over State Aid intervention in the supply of connectivity infrastructure, and a number of structural barriers, has left London with areas of poor connectivity. Small businesses trail residences in access to superfast broadband, with only 56 per cent of SMEs currently having access compared to 75 per cent for UK premises overall. According to the Federation of Small Businesses, only 15 per cent of small firms are 'very satisfied' with their broadband provision, and 25 per cent are 'fairly' or 'very dissatisfied'<sup>12</sup>. Retail and other workspace businesses located on or near high streets need this vital utility to innovate and grow their businesses. However some high street retailers still see the internet as a threat rather than an opportunity and this research could have the double impact of arguing for increased supply as well as suggestions to support high street businesses to understand the opportunities associated with e-commerce.

- **Businesses need support negotiating the opportunities presented by 'small cell technology'.** Small Cell Technology increases the capacity of 4G internet. Providers need more locations to place their small cell masts. These are often placed on rooftops. Currently providers work on a building-by-building basis to negotiate the placement of a small cell and access



to maintain the equipment, in return for rent. Rather than negotiate on a location by location basis providers are looking to develop framework agreements to place these cells on a whole range of sites at the same time. London boroughs could support this work by developing framework agreements on the assets they own/control as well as by coordinating framework agreements across a number of business/locations. Best practice could be shared from TfL who have already undertaken this on their property. In addition the GLA should provide guidance for small businesses approached by Small Cell providers to ensure they receive fair compensation for the use of their properties.

- **Research to understand the value of office workers to town centre economies.** With increasing pressures on employment land it is vital to understand how office workers contribute to the success of local economies. We recommend the LEP undertakes research to map this relationship. This can

be used to make the case for protection of employment land, especially considering the risks of the government's policy on office to residential conversions.

- **An innovative workspace refurbishment pilot in London.** London has taken proactive steps in establishing the Open Workspace Providers Group. This group is working to identify the underused spaces that could be transformed into affordable workspace. Often these types of projects require some pump priming in the form of refurbishment costs. We recommend the Mayor works with London Councils to lobby for a rotating loan fund from the

## Reinforce the character and distinctiveness of town centres within London's network

Planning is vital to the shape, nature and character of local town centres. The National Planning Policy Framework is clear about the importance of town centres and the GLA has published its Town Centres Supplementary Planning Guidance (SPG) in reference to town centre development and management. The SPG rightly recognises that it is local initiatives that will continue to renew and revitalise town centres. With the right planning tools local authorities can effectively develop economically sustainable, socially vibrant and healthy town centres that meet the social, commercial and civic needs of an area. However boroughs do not currently have all the tools they need to shape their local town centres even though they are the organisation with holistic oversight of local economic circumstances, changes in demographics and forthcoming developments.

To enable boroughs to plan an effective balance of uses to shape the character and distinctiveness of their local town centres London Councils recommends:

- **The government does not extend permitted development rights for office to residential conversions on their expiry in May 2016.** Figures collated by London boroughs indicate that at least 100,000 sq m of fully occupied office space has received approval for conversion to residential accommodation – around 39 per cent of the space for which occupancy information is available. At present, boroughs have no power to consider the impact of the loss of viable office

government (with a similar model to the Growing Places Fund) which could support boroughs and other relevant groups to bring these spaces back into use. Funding would be paid back on an agreed basis once the workspace becomes operational.



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space when considering permitted development schemes. Office to residential conversion has had a particular impact in London owing to its significantly higher residential property values in most areas. One borough estimates that it has lost around 20 per cent of its office space through the policy. London Councils will continue to lobby the government not to extend the permitted development rights when they expire next year.

- **The government reverses permitted development rights for the conversion of retail units to financial and professional services.**

The removal of powers for boroughs in this area has meant that they no longer have the tools necessary to promote footfall through protecting existing retail provision. Under this new planning condition, planning permission is not required for a change of use from a shop to a bank and vice versa. While important, the latter type of use reduces footfall in comparison to retail and so without careful management can affect the viability of high streets. These permitted development rights should therefore be reversed and change of use should be locally determined to help boroughs support retail provision in their areas.

- **Tightening up planning rules so that planning permission is required for any change of use from a pub.** We recognise and welcome the government's legislation which means that pubs can now become listed as assets of community value (ACVs). However this position should be strengthened and localised to democratically elected local

authorities. This would mean pubs should be protected in the same way as retail and any change of use from a pub should require planning permission. Not all pubs are listed as ACVs and many are still at risk of being converted to supermarkets or other uses. Providing boroughs with more powers to protect their local pubs is not about protecting failing pubs, instead it is about enabling scrutiny at the right time of whether the loss of that pub site is justified. Aside from being part of the social and cultural fabric of our nation, pubs also provide thousands of jobs and boost the economy by £21 billion a year and are a critical part of local economies<sup>13</sup>.

- London Councils still considers that **the best way to overcome the negative impact of fixed odds betting terminals (FOBTs) is to reduce the maximum spend from £100 to £2 a spin.** Each betting shop can provide up to four B2 category FOBT machines which offer casino style content including games such as roulette at up to £100 a spin, which can be wagered every 20 seconds. In their response to Newham's submission, the government stated that it had already acted by introducing stronger gambling controls to further protect players and promote responsible gambling in April. This includes putting an end to unsupervised stakes above £50 on FOBTs and giving more powers to local authorities to stop new betting shops opening up in their areas. However, there is still a correlation between increased clustering and the presence of B2 machines, as it is in response to this cap that bookmakers have

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opened multiple premises in clusters to facilitate more machines as a fixed margin product guarantees bookmakers a return. The government also committed to monitor the effectiveness of existing controls and to take further action if necessary. London Councils considers further action is needed and recommends a reduction to the maximum spend on FOBTs as described above. Failing this, London Councils recommends that the government works with local authorities to implement new policy tools which support local areas to control the negative impact of FOBTs as they are developed. This could include for example cumulative impact tests to enable councils to reject licensing applications for new betting shops where there are already existing clusters of shops and updating licensing laws to allow councils to take health issues associated with problem gambling and anti-social behaviour concerns into account when considering applications. New research is emerging on the impact of FOBTs and new policy should be implemented to support local areas as required.

- **Improve licensing powers to ensure boroughs are able to regulate unhealthy businesses.** The government recently announced plans to devolve some powers to a number of local authorities in Manchester around health and social care. London would need the same powers, including making health a fifth licensing objective alongside the prevention of crime and disorder, public safety, prevention of public nuisance and the protection of children from harm. In addition,

councils should be allowed to adopt a presumption against granting new gambling licenses based on cumulative impact of having a number of premises in one place. This would work in a way similar to alcohol cumulative impact zones.

- **London Councils will consult its members to understand the any issues with the London Local Authorities Act (1990) in relation to the operation of markets and lobby for amendments if required.** Some borough feedback suggests that London boroughs are not incentivised to invest in their markets. Furthermore, their fragmented set up means it is very hard for local authorities to set a strategic vision for street markets. In other areas market operators (the local authority) are able to apply realistic commercial charges to traders, can derive a profit beyond basic operational costs and markets are set up as a holistic body. However in London fees and charges are controlled in a break even account, keeping rents artificially low. London boroughs can only recoup basic operational costs and cannot derive a profit. Markets consist of a number of individual licensed street traders, making management fragmented. London Councils will consult with members and if necessary explore opportunities to bring forward proposals to improve this legislation
- **Local authorities should consider the possibility of moving their markets to the Food Act.** This transition can make it easier to manage markets, a number of boroughs have already undertaken this transition and lessons can be shared between local areas.

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London Councils will facilitate the sharing of best practice.

- **The GLA should work closely with the London Markets Advisory Group to develop a Markets Board for London** that meets the needs of the sector and can be used to raise the profile and value of London's markets as well as lobby for the resources and tools they need to remain a thriving part of town centres.
- The Mayor's Design Advisory Group should produce a **technical good practice guide to markets design**<sup>15</sup>, drawing on the lessons of the Outer London Fund and domestic and international good practice.

### Foster a vibrant cultural, civic and health and well-being offer within town centres

The relationship between the high street, culture, civic uses, health and well-being is symbiotic. Evidence from The London Development Database indicates that between 2008 and 2013 the largest gains in town centres were in D1 floorspace which include non-residential institutions such as clinics, health centres, crèches, day nurseries, day centres, schools, art galleries, museums, libraries, law courts, non-residential education and training centres. Academics<sup>16</sup> demonstrate there is a spatial preference for locating cultural facilities in town centres and many of the services residents require for their well-being (doctors surgeries, libraries, leisure facilities, access to food) are also often located in town centres. Both the shopping element of town centres and cultural, civic and health service attract a critical mass of

residents and each can support the other. While individuals are responsible for their own lifestyle choices healthy options should make this choice easier.

To foster a vibrant cultural, civic, health and well-being offer London Councils recommends:

- **Continued focused Mayoral funding on culture in high streets** – there has always been a close strategic link between the GLA's work on town centre regeneration and culture. We would like to see this link remain and for the GLA culture team to continue targeting culture funding from a 'town centres first'<sup>17</sup> position. We recommend that a new Mayor prioritises this link.
- Around 50 per cent of high street and shopping centre leases are due to expire in 2015. This is set alongside declining availability and affordability of artist workspace. It would appear likely that there will be an oversupply of retail space and an under supply of creative workspace. **Therefore local authorities should be empowered to repurpose vacant retail units to provide spaces appropriate for their local cultural economy.** Best practice would suggest that such spaces, if



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located in or in close proximity to a high street, should have a public facing angle to ensure they are able to encourage interaction with the local community and economy. A number of the tools already outlined in this report should help local authorities to do this for example business rate retention, the empty shop premium, the extension of reoccupation relief beyond retail and the workspace refurbishment pilot.

- **The London Cultural Strategy group, with support from the Arts Council England, is well placed to provide guidance to support immersive/experiential arts activities to take place in town centre locations.** Immersive or experiential arts activities engage audiences directly with live performances or installations. They often use large-scale sets and invite audience members to participate and move around. Immersive arts activities tend to operate in unconventional locations – from empty buildings to supermarkets, carparks, vaults, tunnels and other unexpected places. Experiential arts activities are an essential part of the creative offer in London. The majority of companies working in this way are based in London or working in and around London. Many of these companies are successfully exporting their individual brands of experiential work to other major cities such as New York and Los Angeles, often supported by Arts Council England or the British Council. In London this area of work is growing in popularity and can play an excellent role in regenerating high streets or town centres. Some of the positive outcomes for high streets

have been increased profile and improved footfall. However, guidance is needed to support this growth and to help councils, landowners and other stakeholders understand how to facilitate it and what the wider benefits can be. There are two key areas that guidance could focus on: Firstly, how to put on a successful event, including help with licensing, working with local stakeholders, regulations and health and safety. Secondly, guidance that could provide information on the benefits this type event can bring to a local area. London is leading the way in this new ambitious, ground-breaking artform and it is crucial that experiential/immersive arts activities are supported in the right way to make sure all of London can benefit.

- **London boroughs should consider creating more smokefree outdoor spaces and set exclusion zones for fast food businesses around facilities with young people.** Local authorities have the power to do this, but existing case studies should be shared to support this process where it is appropriate. London Councils will help to share best practice to support boroughs that are interested in this type of activity.
- **The government adopts the 'Agent of Change' principle which would give boroughs more powers to protect existing non-housing developments such as cultural institutions, night time economy businesses and civic uses from future housing developments.** Town centres are rightly identified as locations that can absorb additional housing demand; however existing

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non-residential businesses may face restrictions from new residential development. For example, sound restrictions or concerns about the number of people visiting an area. The onus of ensuring that new residential developments can exist alongside pre-existing institutions such as clubs, theatres, stadiums and music venues should fall on the developer rather than forcing venues to change their operations to suit the needs of the new homes. Boroughs should be empowered to enforce this. Developers should mitigate the risk of future complaints about noise, rubbish collections, deliveries and other activities associated with non-residential venues by making clear to people buying or renting in the new development that the venue is nearby and it is their choice to move in next to it. Under the Agent of Change principle, if a venue is in place before the residential building, the residential building would be responsible for mitigating the impact of activities that take place at the venue. Likewise, if a new music venue opens in a residential area, the venue are responsible for the cost. This principle already exists in Australian law. The Department for Culture Media and Sport should work with the existing network of supporters for this change, including the Music Venue Trust and local authorities to ensure local areas have the tools they need to protect existing non-residential institutions.

## 4. References

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1. [Mayors' Actions for High Streets](#)
2. [Accommodating Growth in Town Centres: Achieving Successful Housing Intensification and High Street Diversification.](#)
3. [ATCM – 'Helping Make Great Places'](#)
4. [Experian Marketing Services - 'Town Centre Futures 2020](#)
5. It is important to note that not all town centres will need interventions and support. As noted in *Accommodating Growth in Town Centres*: 'The effects of polarisation are likely to see demand concentrated in the International centres and the stronger performing Metropolitan and Major centres. Smaller centres dependent on predominantly convenience goods expenditure should remain largely unaffected but some of the middle ranking Major Centres and District Centres that currently have a high proportion of comparison goods retail but lack much in the way of a wider cultural offer may struggle to attract new retail investment.'
6. The implications of business rate retention and fiscal devolution are considered by the [London Finance Commission](#).
7. London Councils' estimate
8. Empty property relief exempts landlords from paying business rates on empty buildings for three months. After this time, most businesses must pay full business rates.
9. Reoccupation relief for retail means that the government reimburses local authorities that use their discretionary relief (50 per cent relief) for units that were previously vacant being taken on by a use classed as retail in the Use Class Order system.
10. For example this is space that may have flexible access, shared desk space, shared facilities. Co-working spaces often meet this criteria, however it may also be small units or meanwhile space.
11. [Accommodating Growth in Town Centres: Achieving Successful Housing Intensification and High Street Diversification.](#)
12. [Digital High Street 2020](#)
13. <https://www.gov.uk/government/news/coalition-ministers-change-the-law-to-protect-the-great-british-pub>
14. **Negative impact on the vitality of high streets** - Landman Economics estimates that for every £1 billion lost on FOBTs as many as 20,000 jobs are lost in the wider consumer economy while only 7,000 are created in the betting industry. This net reduction of 13,000 jobs for every £1 billion lost is due to FOBTs being non-labour intensive and having comparatively fewer economic multipliers. (Source: <http://fairergambling.org/wp-content/uploads/2012/11/The-Economic-Impact-of-Fixed-Odds-Betting-Terminals.pdf>). In addition, a concentration of non-retail uses does little for an area's vitality, employment opportunities or community wellbeing. This proposal aims to ensure that communities across the country are pro-business where residents enjoy a safe environment. **Increased anti-social behaviour associated with clustering in one locality** - There is significant crime and anti-social behaviour associated with betting shops. 9,308 customer incidents related to gambling activity in betting shops required police assistance in 2013/14 in England,

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an average call out of 179 times per week to bookmakers (Source: Gambling Commission FOI located in appendix c of this document: <https://www.newham.gov.uk/Documents/Campaigns/SCASubmission.doc>)

15. This recommendation is drawn from the [Sustainable Urban Markets Action Plan for London](#). There are a number of other recommendations in the report which, if implemented, would support markets in London.
16. Evans, G. (2005) '[Measure for Measure: Evaluating the Evidence of Culture's Contribution to Regeneration](#)'
17. A 'town centre first' position would mean considering town centres before other locations for cultural activities. It is recognised there may be good reason why a cultural programme is not suitable for a town centre, however the option should be considered.

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