

DISAPPEARING BRITAIN **WHY WE MUST STAND** **UP FOR SMALL SHOPS**



Interim Report of the Conservative Party
Small Shops Commission

APRIL 2008



Conservatives

Summary

The small independent retailers in our high streets have been part of the very fabric of community life in Britain for generations. These small shops not only make our neighbourhoods more attractive, convenient places to live, they in a sense reflect something of what is best about modern Britain itself. They are independent and entrepreneurial, they display a rich cultural and ethnic diversity, and their eclectic differences add real character to our towns, cities and villages.

Yet in too many neighbourhoods across our country, the existence of these small businesses is under threat. The number of independent retailers is in rapid decline; some estimates suggest up to 2000 small shops are closing every year. This poses very serious consequences for social inclusion, the environment, our quality of life and the diversity and attractiveness of our neighbourhoods.

Small retailers face increasing pressure on a number of fronts, from the rising burden of tax and regulation, the growth of out-of-town shopping centres, through to planning decisions that make it harder for small traders to attract customers. Shop owners and staff also face a daily battle against a rising tide of crime, violence and antisocial behaviour. Shoplifting alone costs retailers £150 million every year.

The Conservative Party believes it is time to stand up for small retailers and recognise the vital role they play in our communities. To the most vulnerable members of our society in particular, the independent retailer on the high street can be essential. For many elderly and disabled people who find it hard to get around, or those who cannot afford to run a car, the large out-of-town retail parks just cannot replace the accessible, often personal service offered by local traders.

Helping these small shops to continue to serve our communities is vital. This does not mean we need undue restrictions put on competition from large chains – small retailers know better than most that business is a tough game and they must adapt to changing consumer demands to succeed. But where there is unfair or unnecessary pressure forcing them into closure, it is right to look at what government, local councils and businesses could do together to ensure small shops continue to thrive in our high streets.

In 2007, David Cameron launched a Small Shops Commission, involving MPs and retail industry experts, to examine the issues facing small retailers. This is the Commission's interim report, covering their analysis and proposed way forward for helping small shops continue to thrive. It recommends that a Conservative government should implement a three-point action plan that would:

- Promote better town management through civic partnerships that would ensure high street vitality features more strongly in local planning decisions;
- Encourage more local authorities to promote joint initiatives involving local councils and businesses to tackle retail crime and neighbourhood decline;
- Retain the ability of local councils to ensure out-of-town retail developments work with, not against, the needs of local communities.

1. Introduction: the decline of small shops

Retail is an extremely important sector in the UK economy, with more than a third of consumer spending going through shops. At the end of 2007, retail sales topped £265 billion, and the industry employed over three million people, representing 11 per cent of the total UK workforce.¹

Britain's retailers have enjoyed great success in the last decade, with new markets emerging right across the sector. Consumers have benefited as the major grocers, electronic stores and clothing retailers chase market share in an extremely competitive marketplace. Until recently, the economy has supported high levels of consumer spending and this has resulted in large profits for the major players. Local authorities have welcomed new stores to their high streets and industrial estates, often factoring them in to their plans for regeneration and neighbourhood renewal.

As a result, there has been a steady rate of growth in the number of large stores. Recent analysis by the Competition Commission, as part of its recent inquiry into the UK groceries market, found that large stores of greater than 2,200 square metres have been growing steadily at a rate of around 3 per cent a year since 2000. It notes that, 'between 2000 and 2006, 297 new stores larger than 2,200 square metres opened ... All these larger stores, as far as we are aware, have been opened by the five largest grocery retailers in the UK.'²

While the big players in the retail market have been enjoying steady growth, the picture with regard to small shops on the high street could not be more different. Analysis conducted by the All-Party Parliamentary Small Shops Group in 2006 painted a worrying picture of decline, receiving evidence that up to 2,000 small shops were closing in Britain every year.³

The decline of small shops is not a recent trend, however. The Competition Commission's long-term analysis indicates that the number of specialist grocery stores in most categories has been in decline from at least the 1950s. For example, it states that: 'the number of butchers and greengrocers declined from 40,000–45,000 in the 1950s to less than 10,000 by 2000. The number of bakeries declined from around 25,000 in 1950 to around 8,000 by 2000 and the number of fishmongers declined from around 10,000 to around 2,000 over the same period'.⁴

In terms of the future, it appears clear that the decline of small shops will continue. The All-Party Parliamentary Small Shops Group concluded that the rate of attrition on small shops will push a majority of the remaining non-affiliated independent grocery stores into closure by the year 2015. Their concerns were greatest over convenience stores, newsagents, off licenses and other specialist retailers with less control over the supply chain than is afforded to the big retailers and store chains.

The decline of small shops is, unfortunately, part of a wider decline in vital community services, and increasing numbers of households are being left without easy access to a post office, primary school, local shop or GP surgery. The Conservative Party's analysis of the latest Index of Deprivation, produced by Oxford University for the

1 Retail Key Facts, British Retail Consortium, 2008.

2 Groceries Market Investigation – Emerging Thinking, Competition Commission, January 2007, p.168-9.

3 High Street Britain:2015, Report of the All-Party Parliamentary Small Shops Group, 2006.

4 Groceries Market Investigation – Emerging Thinking, Competition Commission, January 2007, p.4.

Government in March 2008,⁵ reveals that since their last Index was published in 2004, nearly half (45 per cent) of neighbourhoods in England have deteriorated in terms of loss of these core community services.

As to whether an incoming Conservative government could or should do anything to help the viability of small shops, a key question is whether their decline is simply down to economics and consumer choices, or whether there are other factors that are unduly or unfairly forcing small shops out of our high streets. We also need to look at how much it actually matters that small shops are disappearing from the high street, considering what impact this is having on local communities.

2. Why are small shops in decline?

Trends in the retail market

There are obvious commercial advantages that larger retailers and chain stores have over small independent retailers, which can be passed on to the consumer, notably in the form of lower prices. These are likely to stem from the lower costs of supplying larger retailers, and the ability of the big retailers to use their greater buying power to press for lower costs from those suppliers.

In the grocery sector in particular, these advantages have allowed large retailers to achieve far better sales growth than the small shops. Analysis by the Competition Commission shows that since 2000, real terms sales growth at supermarkets was 26 per cent, at convenience stores it was 19 per cent, but specialist grocery stores, e.g. butchers, saw only 1 per cent sales growth in real terms.⁶

While this may be seen as a natural feature of increased competition, there has been concern that certain commercial practices undertaken by the large players have an unfair impact on smaller retailers. Supermarkets have come under particular scrutiny and, in May 2006, the Competition Commission began an investigation into the market following a referral from the Office of Fair Trading.

The Commission was already aware that certain practices carried out by supermarkets, in their words, 'give rise to a complex monopoly situation', and these 'operated against the public interest'.⁷ Below-cost pricing was a particular concern, where large retailers significantly undercut market prices on the high street by selling certain basics at a loss, in order that customers switch to the larger store, where losses can be recouped on other product lines. The Commission noted that this behaviour 'distorted competition and damaged smaller grocery retailers and convenience stores, thereby adversely affecting elderly and less mobile consumers, who tended to rely on stores operated by smaller retailers'.⁸

The latest round of investigations by the Commission examined whether the entry of a large supermarket pushes out small shops, and the evidence gained painted a mixed picture. Their analysis, conducted over 1999 to 2006, showed that 'entry by a supermarket into a high street or local shopping area caused net exit (ie greater exit

5 The English Indices of Deprivation 2007, Dept. of Communities and Local Government. March 2008.

6 Groceries Market Investigation: Emerging Thinking, Competition Commission, 23 January 2007, p. 4

7 Market Investigation into the Supply of Groceries in the UK: Provisional findings report, Competition Commission, October 2007, p.22.

8 Ibid, p.22.

than entry) by grocers and local market places', but at the same time they found 'no identifiable effect on fishmongers, butchers, off-licences, delicatessens, convenience stores and health food stores'.⁹

In terms of whether large retailers prevent new smaller stores opening, the picture was again mixed: 'we consider that the national grocery retailers have a cost advantage over their smaller competitors as a result of their distribution systems, and these may represent a barrier to entry or expansion by smaller competitors or new entrants ... However, we consider that this cost advantage is mitigated by the presence of the wholesaling sector'. (p10).

So there is evidence from the Commission's analyses that both the entry into local markets and the commercial practices of large retailers do impact negatively on small shops, in some sectors at least. Much of the decline of small shops over the years, however, must in part reflect changing consumer choices.

People in Britain are working longer than ever, the cost of living is rising and convenience is at a premium. The larger supermarkets obviously meet these lifestyle needs well. They often offer a very wide range of products, conveniently situated in one premises, at relatively good value. Travelling behaviour is also changing, and people are increasingly preferring to go further for their shopping, and to do so by car rather than on foot or by public transport (data on this appears in Section 3). Out-of-town locations suit this, and can often offer free parking, which is becoming rarer in our town centres.

There is no doubt that market conditions for small retailers are tough. They lack the buying power and economies of scale of the large chains and as a result have seen very slow sales growth over a recent period of high consumer spending. Now, consumer spending is tightening and this is likely to prompt a decline in retail sales. According to recent commentary by the British Retail Consortium, this will hit smaller retailers the hardest.¹⁰

Crime and anti-social behaviour

Small shops on the high street rely heavily on the foot traffic of passers-by and frequent shopping visits, since far less money per customer is spent in a small shop on any given trip than is spent in the large outlets. The median amount a customer spends is just £4.80 per visit to a shop smaller than 280 square metres, compared to nearly £20.00 at one of 2,500 square metres.¹¹

So any factors that actually put customers off visiting our high streets obviously present a direct threat to the business of small retailers. Sadly, our consultations with the retail sector showed very strongly that rising crime and disorder are posing exactly this difficulty to many small shops.

Britain's retailers face a daily battle against a rising tide of crime, violence and antisocial behaviour. The latest Annual Retail Crime Survey from the British Retail Consortium illustrates the scale of the problems all retailers face:¹²

⁹ Ibid, p. 152.

¹⁰ A tough six months ahead for small retailers, BRC Press Release 07/01/2008.

¹¹ Market Investigation into the Supply of Groceries in the UK: Provisional findings report, Competition Commission, October 2007, p.20.

¹² Retail Crime Survey, British Retail Consortium, 2007.

- Over the last seven years, retailers have reported losses of over £1 billion due to customer theft, with an average of £150 million of theft being detected each year;
- The latest recording of customer thefts stood at 3,958 per 100 outlets – the highest figure so far this decade;
- Physical violence against shop staff increased by 33 per cent to reach 32 incidents per 1,000 employees in the last recorded year (2005-6);
- There are on average 107 threats of violence made against shop workers per 100 outlets every year;
- Verbal abuse against shop staff has more than doubled since 2000, with incidents per 1,000 employees rising from seven to 15 in 2006. The average number of incidents per 1,000 employees remains high at 16 each year.

There are also other relatively less serious, often unreported forms of disorder, which still create high costs for shop owners. Our consultations revealed widespread problems of graffiti, smashed windows and vandalism, doorways being used as urinals and other anti-social behaviour. These all add to the commercial pressures retailers are already under, hitting the smaller retailer especially badly.

The daily struggle against crime, much of which goes unreported, drains retailers of funds and can put people off visiting the high street altogether. This can be disastrous for small retailers, who need to work incredibly hard to attract and retain regular custom to remain viable. In their latest analysis of crime against business, the British Chambers of Commerce noted, “small businesses with few resources are particularly affected by crime which, in severe cases, can lead to their closure.”¹³

There are some schemes available to local businesses which allow them to work with local authorities and the police to tackle retail crime. ShopWatch, for example, is a volunteer scheme operating in several areas of Britain which allows shop staff to act as local security wardens for a part of their working day, carrying out patrols and providing additional eyes and ears for the regular police. Community Safety Partnerships are also available in some areas and help retailers fight back against crime.

In spite of the availability of successful partnerships like these, participation is patchy, and low awareness appears to be a key problem. The British Chambers of Commerce recently surveyed local businesses of all kinds and found that 81 per cent reported crime to be a problem in their local area, but only 27 per cent were aware that any kind of local partnership opportunity existed to help them work together to tackle it. Awareness was especially low among the smaller organisations.¹⁴

Pressure from Government

It is an unfortunate fact that since this Government came to office in 1997, small businesses have been enduring ever-rising levels of tax and seemingly endless rafts of new business regulation. In 1997, the UK had the 4th lowest corporate tax rate in

¹³ The Invisible Crime: A business crime survey, British Chambers of Commerce, April 2008.

¹⁴ The Invisible Crime: A business crime survey, British Chambers of Commerce, April 2008.

the EU; now it has been pushed back to being only the 19th lowest. In terms of regulation, the Federation of Small businesses recently counted over 80 new pieces of extra business legislation introduced in April 2008 alone, an increase of 12 per cent in just the last year.¹⁵ The Government's own Annual Survey of Small Businesses' Opinions 2006/07 found that 60 per cent of small businesses saw government regulation as a direct obstacle to business success.¹⁶

A specific regulatory threat to small shops is the Government's intention to remove what is known as the 'needs test' from planning rules through changes to Planning Policy Statement 6 (PPS6). PPS6 sets out government policy on planning for town centres and requires a needs assessment to be conducted when an application for an out of town development is made, ensuring there is a genuine need for this in the local area.¹⁷ The arrangements proposed to replace this focus on promoting competition between supermarkets, but do not give due attention to issues such as the viability of small shops or the importance of high street retailers for vulnerable residents. The Association of Town Centre Management argue that the removal of the needs test will accelerate the decline of town centres by undermining the strength of existing planning policies and permitting far more out of town development.¹⁸

Other local services essential to communities are also under threat from policy decisions taken by central government. Perhaps the highest-profile of these is the Government's plan of cuts to the Post Office network. We have already seen around 4,000 local post offices shut down since this Government came to office in 1997, and a further 2,500 are also set to face the axe under their programme of closures. This has a direct link to local shop closures in many parts of the country, especially rural areas, since post offices often serve a combined function as the local shop. It has been estimated that as a result of planned post office closures, another 1,000 village shops could be lost at the same time.

Our own consultations also revealed frustrations among retailers with town and retail planning strategies that can exacerbate the decline of small shops. Examples include pedestrianisation programmes that proceed without comparable public transport or parking arrangements, and disconnect between traffic management and off-street parking planning. Another significant issue was the current system of land use classes which, despite a number of recent revisions, fails to prevent the loss of independent shops to huge fast food and coffee shop chains. There are, of course, some examples of excellent local authority planning strategies that maintain the vitality and diversity of high streets. Where problems exist, these appear to principally stem from a lack of joined-up thinking and proper consultation.

3. Does it matter that small shops are closing?

The short answer is yes. In fact, it matters a great deal. Small shops make our neighbourhoods more attractive, more convenient places to live. It is their diversity, not just in terms of what they look like and what they sell, but also their rich cultural and ethnic mix, that adds enormous character to our towns, cities and villages.

¹⁵ Government ignores its own rules on better regulation, Federation of Small businesses Press Release, 3 April 2008.

¹⁶ Annual Survey of Small Businesses' Opinions, Dept for Business, Enterprise and Regulatory Reform, 2008.

¹⁷ This refers to the sequential nature of planning procedures for out of town commercial developments introduced in 1996 as part of PPS6, including the requirement for a needs assessment

¹⁸ ATCM Position Paper – Need Test, Association of Town Centre Management, January 2007.

But we are not just losing an important part of our British heritage as our high street shops disappear. Aside from the loss of physical diversity and attractiveness in our neighbourhoods, the disappearance of small retailers has some very serious consequences for social inclusion, the environment and the quality of community life.

Environmental and social impacts

The trend towards shopping at out-of-town supermarkets and retail parks has some significant environmental implications. Department of Transport data on the shopping trips made by consumers and their mode of travel shows people have come to rely on heavy car use for shopping, especially for food, and distances being travelled are increasing sharply:¹⁹

- The average length of a shopping trip has increased by 10% since 1997 to 4.3 miles;
- In the last recorded year, people travelled on average 879 miles just for shopping trips;
- The car is by far the main mode of travel for nearly two thirds (63 per cent) of all shopping trips. Only a quarter are made on foot and most of the remainder are made by bus;
- Car use is particularly high for food shopping, which represents half of all shopping trips – over three quarters of households do their food shopping by car;
- The very high car use for food shopping is in spite of the fact that 93 per cent of households live within 15 minutes walk of their nearest grocery store.

Of course, increased use of cars for shopping will in part reflect people's preferences. But with declining numbers of small shops in our high streets, problems arise for those people who do not own cars and cannot easily get to the retail parks and out-of-town shopping areas.

Analysis of the last census by the Office for National Statistics shows that car ownership is in fact very closely related to age and income:

- 59 per cent of households in the lowest income quintile do not have access to a car; seven times higher than the proportion of people without a car in the top income quintile;
- 50 per cent of pensioner households are without a car.

To the most vulnerable members of our society, the independent retailers and market traders on the high street are absolutely essential. Many elderly and disabled people in particular, rely heavily on these essential businesses. For someone with mobility

¹⁹ *Shopping: Personal travel factsheet*, Office for National Statistics / Dept for Transport, 2007.

problems or a disability, simply knowing a local shopkeeper who knows and understands their needs can make all the difference to their quality of life.

Indeed, as has already been mentioned, the Competition Commission have observed that the impact of the larger out-of-town retailers on the smaller local grocery retailers and convenience stores is 'adversely affecting elderly and less mobile consumers, who tend to rely on stores operated by smaller retailers.'²⁰

The impact on diversity

The New Economics Foundation has been researching the impact on communities of the decline of independent retailers in our high streets for some years now. Their first major series of reports was '*Ghost Town Britain*'²¹ which detailed how the loss of local independent retail businesses contributes to economic exclusion and marginalisation, especially for people living in low-income areas.

The NEF warn that Britain is now faced with the prospect of a 'tipping point' where the number of local independent outlets could crash dramatically rather than continue in steady decline. It notes the sharp loss of many corner shops, grocers, post offices and pubs, predicting that many small communities (of 3,000 people or less) will have no such local outlets by the year 2010. In some low-income neighbourhoods this is already a reality.

The NEF are also researching the impact on community diversity of the decline of independent retailers. Their follow-up to the *Ghost Town* work was '*Clone Town Britain*'. This research surveyed areas all around Britain to identify the spread of 'clone towns' – places where local high street shops have largely been replaced by global and national chains. Their results showed that 41 per cent of British towns had become clones, and that these towns actually tended to have a smaller range of categories of shop, meaning a reduced range of services available for local people.

4. Policy options and recommendations

In the introduction to this report, the question was posed as to whether an incoming Conservative government could or should take action to tackle the disappearance of the small shops on our high streets. From the evidence we have gathered, it is clear that their decline is in part due to economics and people's choices, and we recognise that ultimately, the small shops on our high streets will be lost unless consumers support them. But small retailers know this and have always had to adapt to changing consumer demands in order to survive and thrive.

We do not want to see any policy action that would lead to unnecessary restrictions being placed on competition from large retailers and chains. These are already subject to an inquiry by the Competition Commission. However, we have identified factors that are adding unnecessary pressure on small shops to close. We have found that the effects of this have a direct and negative impact on our local communities, particularly for vulnerable people who rely on them most. We therefore believe it is time to take action and stand up for small shops.

²⁰ Market Investigation into the Supply of Groceries in the UK: Provisional findings report, Competition Commission, October 2007.

²¹ *Ghost Town Britain I* (2003), and *Ghost Town Britain II* (2004): The New Economics Foundation.

What can we learn from current best practice?

The Conservative Party believes the well-being of local communities is absolutely crucial to ensuring an economically successful and socially inclusive society. We do not just view the local shops and services on our high streets as aesthetically pleasing; we understand that they are hubs of social interaction and support that are especially important for the most vulnerable members of our society. It is not surprising therefore, that we see local Conservatives taking the lead to promote successful strategies for maintaining the vitality and diversity of our high streets.

Conservative-controlled Wandsworth Borough Council, for example, is acting to preserve the economic success of its local shopping areas, in response to the concerns of local residents and businesses. Its Northcote Road area, for instance, is a vibrant high street district with a strong sense of community, but one in which the viability of local independent traders has been under increasing pressure. So the Council has issued an action plan, which includes a new community trust which could manage and invest in street improvements, and the Council also aims to preserve the area's unique character through street design improvements and planning policies that support the diversity of local trading.

Kensington and Chelsea Council is another Conservative-run council that is leading with innovative responses to local people's concerns about the shops on their high street. The Council set up an independent Retail Commission to investigate the options for improving the economic vitality and individuality of town centres, and will, as a result, be appointing a town centre manager who will take an active role in promoting the economic success of local trading areas. The Council will also be establishing a grant scheme to promote high quality shop front design, and looking at how best to use planning, parking and other regulations to support the character of specialist shopping areas and high streets.

Conservative-led Westminster City Council has also acted to ensure local shops can thrive through its award-winning 'Civic Streets' programme of high street renewal. The programme regenerates local shopping areas suffering from decline, helping to transform them into thriving locations for business and local traders. The council's resident perception surveys show the Civic Streets scheme has markedly improved trading areas and there is a renewed demand for holding activities such as local civic events and street markets.

There is also innovative leadership from Conservatives on tackling Post Office closures. Conservative-controlled Essex County Council recently became the first local authority in the country to announce firm plans for taking over post offices currently earmarked by the Government for closure. The Council recently announced proposals to invest £1.5m over three years and is planning innovative solutions to bringing branches back to profitability, such as delivering postal services alongside local council services from the same premises. The aim is that branches will become financially self-sufficient and cost neutral to the Council, and the plans are now being negotiated with the Post Office.

What is common to all these examples of success is that local authorities have worked in consultation and partnership with local people and businesses to find holistic solutions to improving the economic and social vitality of local trading areas.

What action could a Conservative government consider?

Small shops and other local services are crucial to community life, and Conservatives have already been taking a stand on post office closures, pledging that a new Conservative Government would implement reforms that would help preserve these important institutions. We are also working to help small businesses with the rising burden of tax and regulation. In January 2008, we launched a review to establish a principle-based approach to deregulation, to be announced at the Party's October Conference.

We believe specific help could also be designed for small shops, and we recommend that a Conservative government should implement a three-point action plan:

a) Promote better town management through civic partnerships that would ensure high street vitality features more strongly in local planning decisions.

At present, several agencies and bodies have responsibility for the various aspects of town management, including district councils, county councils, town councils and police authorities. These bodies largely do a good job, but can often fail to communicate and consult properly with each other over key decisions affecting the high street, in areas such as planning, crime prevention, and traffic management. As we have seen, this often creates particular problems for small shops.

There are, however, excellent examples how a holistic, partnership approach to town management can improve immensely the economic and social vitality of our high streets. Take the award-winning Huddersfield Town Centre Partnership, for example. This has built an effective working partnership between retailers, the council and other agencies and voluntary organisations that has strengthened local decision-making and produced real benefits for the local community.²²

We believe more of our communities could benefit from this approach, but we recognise that not all councils have the resource and expertise to set up such initiatives. We recommend a Conservative government plays a leadership role in encouraging the development of town management partnerships, perhaps by issuing guidance and other resources, or by sharing best practice from existing successful initiatives around the country. The key is not to create new standards or schemes to be imposed on local communities from Whitehall, but to give them the encouragement and support to build their own partnerships to protect and improve the quality of their high streets.

b) Encourage more local authorities to promote joint initiatives involving local councils and businesses to tackle crime and neighbourhood decline.

Building on our recommendation to strengthen local planning through better civic involvement, we recommend a Conservative government considers options for encouraging more civic partnerships to tackle retail crime and neighbourhood decline. As with general town centre management, this approach is now proving successful in many areas and improving the safety of local trading environments.

²² See Association of Town Centre Management's case studies at <http://www.atcm.org/case-studies>

There are good small schemes, such as Community Safety Partnerships and ShopWatch, which offer retailers the chance to work with the police to help tackle crime. This approach has proved especially good for sharing information, e.g. allowing the passage of intelligence and photographs of known shop thieves to be circulated among retailers. ShopWatch, in particular, is achieving excellent results: on average, one arrest per tour of duty by a volunteer is made for possession of drugs, shoplifting, fraud, drunk and disorderly, or breach of the peace.²³

Larger partnership schemes can also be successful where they retain a local, focused approach. Business Improvement Districts, for example, work in some areas to make high streets safer, more attractive places to do business and to shop. We believe more communities could benefit from this local partnership approach, involving key civic bodies, such as retailers, councils and the police.

c) Retain the ability of local councils to ensure out-of-town retail developments work with, not against, the needs of local communities.

In this report, we have described how the needs test in planning decisions is essential for the survival of small retailers in town centres and high streets. This is incredibly important for people in local communities, especially the most vulnerable. The Government intends to remove this, and we believe this is a serious mistake. We recommend that a Conservative government retains the needs test.

We believe this action plan provides an essential basis for policy action that will help ensure small shops and other services continue to thrive in our local communities. We will continue to consult with relevant interested parties on the detail of potential solutions.

This interim report does not represent official Conservative Party policy, it is the analysis and recommendations of the Party's Commission on Small Shops. We will publish our final recommendations to the Party in due course.

²³ ShopWatch results: see <http://www.shopwatch.info/about/results.php>