

ACS Submission: Business Rates Review 2020 – Tranche Two

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the HM Treasury review of business rates. This submission responds to tranche two of the call for evidence. ACS represents 33,500 local shops and petrol forecourts including Co-op, McColls, BP and thousands of independent retailers, many of which trade under brands such as Spar, Nisa and Costcutter. Further information about ACS is available at Annex A.

Business rates remain one of the largest fixed costs for retailers and fundamentally impact business planning and investment decisions. The Government has made meaningful interventions over recent years to support local shops via the business rates system, for example increasing the thresholds for Small Business Relief, shifting annual uprating calculations from RPI to CPI and the retail discount.

We support the headline objective for this review to reduce the burden of business rates on business and would support further exploration of options to account for taxing online businesses through an online sales levy (OSL) or alternative rating methodology for online distribution warehouses used to reduce bills for retailers. We believe that the business rates system should remain a property-based tax; a move to a turnover or sales-based tax would be damaging to convenience stores and the wider retail sector. The economic case has not been made for a Capital Values Tax (CVT), which would require significant upheaval to deliver with limited benefits. This submission also advocates targeted measures to incentivise investment, support access to local services and improve the administration of business rates.

Our key recommendations are as follows:

- Introduce an Online Sales Levy or an alternative rating methodology for online distribution warehouses. Use revenues raised to reduce bills for retail stores to support the viability of high streets and local services.
- Simplify the valuation process to reduce pressure on VOA resources and allow focus on valuing owner-occupied properties. Consider the principle of linking rating to other proxies in the tax system, such as Stamp Duty Land Tax on leases.
- Continue to centrally fund upward Transitional Relief if downward transitional relief is to be scrapped.
- Reform the appeals system by shortening the statutory timeframes for the VOA to respond to checks and challenges and improving the transparency of data used to inform valuations.
- Incentivise investment by allowing ratepayers to recoup the costs of investment before business rates bills increase, similar to the Scottish Business Growth Accelerator Scheme.
- Deliver three-yearly revaluations from 2023 to strike a balance between certainty for business and VOA resource.

For more information on this submission, please contact ACS Public Affairs Manager Steve Dowling via steve.dowling@acs.org.uk / 01252 533009.

Valuations and transitional relief

10 What are your views on the frequency of revaluations and what changes should be made to support your preferred frequency?

There is widespread consensus amongst business sectors on the need to deliver more frequent revaluations. More frequent revaluations would allow rateable values to better track with the economy and minimise the likelihood of disproportionate liabilities based on out-of-date information. We want rateable values to link more closely with non-domestic property values and three-yearly revaluations would be proportionate based on the resources available to the VOA and certainty for business. We understand the need for a two-year AVD at this time to ensure bills are based on the best available market evidence.

11 What are your views on a banded or zone-based valuations system and the trade off with valuation specificity?

Britain has the highest non-domestic property taxes within the OECD and as such businesses deserve a rating system that is accurate¹. Banding or zoning valuation systems would not account for intra-regional differences in the property market and would undermine perceptions of fairness by creating significant winners and losers at the edge of bands. This impact and the subsequent rise in appeals cases would occur regardless of the number of bands. A zoning approach would also unfairly remove accuracy in bills for ratepayers.

12 What are your views on changing the valuation process or the information provided to the VOA, to enable more frequent revaluations?

The VOA's Rating Contact (VORC) scheme already enables the VOA to collect property details and rental information from ratepayers with ten or more properties. Rent, Lease or Ownership Details Forms can gather data from other ratepayers. These are the two mechanisms through which the VOA can gather quality data to inform valuations. Land Registry data is unlikely to provide a useful guide to value for business rates and there is little other public and easily accessible available information about rental values in the non-domestic property market.

The VOA should assess whether these data-gathering processes are working as well as they could be. Gathering more data could be possible but would need to be light touch for business, a good proxy being data which is accessible through property contracts. Property transactions can also have a lag and related data would not necessarily be available until after the valuation date.

The Government could explore using lease values to simplify rating calculations and reduce the VOA resource required to conduct valuations. Lease values are already used as a basis for an existing tax administration in Stamp Duty Land Tax (SDLT). Leases where values are low could be exempted from business rates in a similar way to the Small Business Relief scheme. Leases equivalent to under £51,000 RV where the Small Business Multiplier applies could be charged a flat percentage of their lease value, reducing the burden on the VOA to complete rating assessments and process appeals.

This could allow the VOA to focus its resources on larger properties where full property valuations may be required or adopt a higher flat percentage of lease value. This system could adopt an allowance approach to prevent cliff-edges in bills paid. This would be similar to the existing SDLT approach with rates payable only on the portion of rateable value subject to that multiplier. Such a system would allow for a more subtle use of multipliers for different ranges of rateable values.

13 What are your views on the relative importance of the period between the AVD and compilation of the list vs. more frequent revaluations?

The frequency of revaluations should be prioritised over AVD to rating list timescales. More frequent revaluations will reduce the incidence of unexpected spikes in business rates liabilities which can impact business planning and investment. Moving towards a shorter 12-month AVD after three-yearly revaluations

¹ <https://www.oecd-ilibrary.org/sites/9789264254053-5-en/index.html?itemId=/content/component/9789264254053-5-en>

are embedded would be welcomed. However, a system with 12-month AVDs would have to provide reasonable notice of multipliers to ratepayers to inform business planning and a simple process for data collection from retailers with larger property portfolios. These factors are important to allow retailers to forecast bills and administer data requests without using disproportionate time or resource. 12-month AVDs would be preferable if revaluations become more frequent than three years.

14 What are your views on changing the definition of rents used in the valuation process? How could this be done in a way that most fairly reflects the value of the property?

Headline rents are a good reflection of property values in the convenience sector, with service charges and similar costs a low proportion of property costs relative to other non-domestic property uses.

16 What are your views on the design of the transitional relief scheme, and how transitional arrangements should be funded, given the requirement for revenue neutrality?

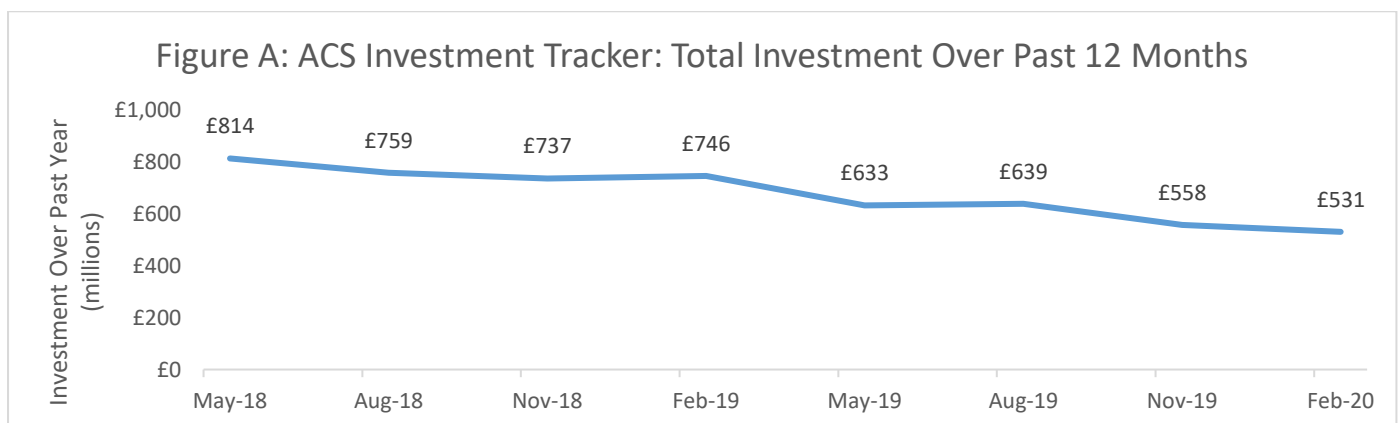
The Transitional Relief scheme has been valuable for flattening increases or decreases in rates bills and has worked well over several rating lists. We would not advocate scrapping the transitional relief scheme. If the Government seeks to reform Transitional Relief by reducing or removing downward caps it must continue to centrally fund upward Transitional Relief to support businesses that are seeing growing business rates bills.

Transitional Relief should be expanded to account for businesses which receive higher rateable values due to receipts and expenditure rating methodologies. Specifically, convenience stores operating on petrol forecourts are rated on this basis which often causes them to fall into the large business threshold of Transitional Relief schemes despite being small businesses by all other business metrics. This causes these businesses to not benefit from Transitional Relief as they should. The Transitional Relief scheme for 2023 should ensure this outlier does not prevent support for these types of business.

Plant and machinery and investment

17 What evidence is there that the business rates treatment of P&M and changes to property affects investment decisions?

ACS' Investment Tracker (see Figure A) finds that investment by convenience retailers in properties is declining. Targeted amendments to the treatment of plant and machinery in shops by the business rates system could spur stores to maximise opportunities to improve their stores. This would enable the wider positive benefits of store improvements to be realised on a larger scale, for example increased energy efficiency and reduced crime after renewable energy items and CCTV systems are installed.



ACS' research has shown how the business rates holiday for 2020/21 enabled retailers to continue operating their stores and invest in services. Despite the pressures of the pandemic and additional operating costs, 26% of independent convenience stores have used the capital release from the business rates holiday to invest in their stores and new services for their customers (10%)².

² ACS Voice of Local Shops Survey: August 2020

18 Are the current P&M principles and regulations still relevant? How could these be updated if necessary, and what would the effect of any proposed changes be?

This answer applies to Q18-Q22.

The Government rightly identifies reducing the burden of business rates as the main objective of this review. This will enable retailers to increase investments in their businesses. Top areas of investment for retailers over the past year include refrigeration (42% of those investing), in-store lighting (32%), air conditioning (12%), crime prevention measures (10%) and full store refits (5%)³.

Amending the plant and machinery regulations could incentivise further investment from retailers, which could in turn support wider Government objectives on climate change via solar panels or reduced crime via CCTV systems for example. We would support a scheme allowing businesses to recoup the costs of investment before increases in business rates bills take effect. This could be achieved by adopting a scheme similar to the successful Scottish Government Business Growth Accelerator. This should delay increases in bills for two years to unlock further investment from the convenience sector, which invested £585m over the past year⁴.

Exempting certain hereditaments from the rating list would also provide a significant boost to achieving wider government objectives and incentivise investment without reference to state aid limitations. For example, ultra-low emission vehicle infrastructure and the parking spaces required to offer these facilities should not attract rates bills to support the Road to Zero Strategy⁵. If a deposit return scheme is introduced in England, reverse vending machines for the return of used containers should be exempted from rates bills to remove a disincentive to their installation.

The Small Business Rate Relief (SBRR) scheme should also be amended to incentivise investment. One perverse outcome of the current SBRR scheme is that retailers lose support if they expand their business to operate a second convenience store. This is a key disincentive to independent retailers expanding into other often underserved and isolated communities. We would therefore support the Treasury considering expanding the eligibility threshold for SBRR on a second premises from the current level of £2,899 RV or a combined £20,000 RV.

Valuation transparency and appeals

23 What further changes would you like to see made to the (a) Check, (b) Challenge and (c) Appeal stages?

An accessible and functioning appeals system is fundamental to a fair and coherent business rates system. The introduction of 'Check, Challenge, Appeal' in England was intended to reduce speculative appeals and deter rogue agents. However, the new system remains complex and inefficient, characterised by extended uncertainty over rating decisions and an onerous rollout of the VOA's appeals portal. At least 21% of convenience retailers lodged an appeal after the 2017 revaluation, with 50% of those to have received a hearing outcome seeing their rateable value change⁶. Yet the new system caused an 80% decline in appeals cases lodged in the first 18 months of the rating list from 2010 (314,130) to 2017 (65,380)⁷.

We recognise some improvements have been made to the VOA's appeals portal, notably the provision of application programme interfaces (APIs) to enable larger retailers to use their own software to transfer data regarding multiple cases directly onto the portal at once. Digitising the challenge form is a practical

³ ACS Local Shop Report 2020

⁴ ACS Local Shop Report 2020

⁵ <https://www.gov.uk/government/news/government-launches-road-to-zero-strategy-to-lead-the-world-in-zero-emission-vehicle-technology>

⁶ ACS Voice of Local Shops Survey: February 2020

⁷ <https://www.gov.uk/government/statistics/non-domestic-rating-challenges-and-changes-2017-and-2010-rating-lists-december-2018-experimental>

improvement and adding ATMs cases to the digital service enables these cases to begin, although many of these improvements would have ideally been incorporated from launch day.

Timeframes

Statutory response times for the VOA remain too generous and new secondary legislation is needed to reduce the limit for both Checks and Challenges making them equitable with ratepayer deadlines. From claiming a property to navigating through the Check, Challenge and Appeal stages currently take over three years in most cases. Ratepayers are burdened with higher rates bills during this time, when these funds could be better used to promote and grow the business.

Transparency

Poor transparency about the information used to inform valuations remains a frustration for ratepayers increases the number Checks and reduced confidence in the appeals system. We support the consultations suggestion that where evidence is withheld from the ratepayer the VOA clearly explains its reasons and separately explore whether further information could be shared in future.

Accessibility

The 'challenge' stage also requires ratepayers to provide an alternative valuation and supply all evidence within 4 months of an accepted 'check'. This makes the appeals system inaccessible for ratepayers without professional representation. The 'appeal' stage now charges a £300 fee to the ratepayer (£150 for small businesses), refundable on successful appeal. The upfront costs, technical rating knowledge and practical problems with the VOA appeals portal are barriers for retailers looking to use the appeals system.

24 What are your views on sharing information, such as rental/lease details, with the VOA? What are your views on the risks and benefits of this information being shared with other ratepayers, public sector organisations or more broadly?

See Q12.

Maintaining the accuracy of ratings lists

26 What are your views on introducing a requirement to provide the VOA with rental information, either routinely or where changes to a lease occur?

Existing powers for local authorities to request property evidence from ratepayers means there is limited justification for introducing a new obligation for ratepayers to proactively notify local authorities when they make changes to their properties.

This suggestion aims to improve the flow of information from ratepayers on changing property characteristics, which could be achieved through the existing Valuation Office Rating Contact (VORC) scheme and VOA rent, lease or ownership details forms. The rent, lease or ownership details forms are used to check rateable values are correct and are already mandatory for ratepayers to complete.

27 What are your views on making a register of commercial lease information publicly available?

We do not support a fully public register of commercial lease information. The information provided could be misleading and difficult to interpret when there is a need to look beyond headline rent figures. Putting lease information into the public domain also raises questions about how this would be used by third parties, for example insurers, which requires full and proper consideration.

28 What are your views on introducing a requirement to notify the VOA or billing authority of changes to a property that could impact the business rates liability?

We recognise the intention of this proposal to maintain more up to date property information within the VOA between revaluations. However, determining the rateable value of a property is a complex process which goes far beyond the 'shell' of the property to consider a range of internal items and other building features.

It is unreasonable to expect all retailers to be able to track internal features within their store(s) and understand whether they affect rateable value.

For example, 72% of convenience stores are run by independent retailers, often without the in-house expertise of a property or estates team⁸. Multiple retailers would also find a legal obligation to notify local authorities about property changes difficult, many of whom do not have a central recording of changes made to properties. Existing powers for local authorities to request property evidence from ratepayers means there is not a case for requiring ratepayers to proactively notify the VOA or local authorities when they make changes to their properties.

The billing process

29 How can the current billing process be improved? What changes would provide the most significant benefits to ratepayers through for example, cost or time savings?

A digitised billing system could usefully allow retailers to track the status of bills and business rates liabilities year-to-year.

30 What are your views on a centralised online system linked to other business taxes, enabling more joined-up data and management of billing across different locations? How could this best support ratepayers and billing authorities?

We would support a centralised online billing system. Retailers have consistently reported the different formatting of bills across local authorities as unhelpful and a centralised billing process and helpdesk could streamline the administration of bills.

31 What sort of support would businesses and agents expect to receive when moving to a centralised online process, and from where would you expect to receive it?

We could participate in beta testing stages of new software. Retailers would value clear guidance and FAQs to be published alongside a new online billing portal, administered by the VOA.

32 What, if any, criteria should be applied in exempting certain ratepayers from online billing?

A centralised billing portal could for business rates could incorporate the existing Making Tax Digital for VAT software and use MTD's exemptions rules⁹. Retailers for whom accessing and using digital services is not reasonably practicable within the business should be exempted from any requirement to use an online portal for business rates administration.

Exploring alternatives to business rates

33 What are the likely benefits and costs of implementing a CVT? What are the practical implications of implementing a CVT?

We have explored the implications of a Capital Values Tax (CVT) with particular attention given to the Californian example referenced in the consultation. In California, commercial property taxes are attached to the property's original purchase price, plus the cost of later improvements, not the property's current market value. Annual bills are increased by the lower of 2% or CPI inflation and bills for property improvements are capped to 2% annual increases with exemptions from bills for solar energy, fire safety and accessibility related property improvements. When a property is sold, it is reassessed at its new market value, typically defined as the purchase price. The California State legislature is set to debate abolishing its CVT and moving towards a system far more similar to business rates based on market values and regular revaluations.

⁸ ACS Local Shop Report 2020

⁹ <https://www.gov.uk/government/publications/vat-notice-70022-making-tax-digital-for-vat/vat-notice-70022-making-tax-digital-for-vat#para-3>

We do not support moving to a CVT system. The possible benefits of a CVT are outweighed by other considerations and could already be achieved within the existing business rates system. The issues with business rates are not fundamental to the tax itself and significant positive developments have been made in recent years, for example changing the indexation of rates to CPI and raising Small Business Relief thresholds. Reforms should therefore look at amending the current system rather than switching to a new system entirely.

Adopting a CVT would not sufficiently address the significant impact of the rise of online retail on high streets and traditional bricks and mortar retail. A CVT would also require retailers to submit more information to authorities about internal changes made to stores, adding administration burdens onto businesses. The Californian example has also seen revenues based on 1% of property value consistently outstrip economic growth, ultimately causing the state legislature to consider now actively moving towards a business rates system.

CVT in California is a two-track system – some non-domestic properties are taxed based on purchase price with capped annual increases while others are taxed based on market value, depending on the prevailing commercial property market. As a result, similar properties can have quite different liabilities, making the tax distortive and a disincentive to purchasing commercial property.

34 What evidence is there of the benefits that replacing business rates with a CVT would have in practice, for example, on business investment and growth?

The economic case for a CVT has not been made or modelled for UK business property. A CVT would disincentivise businesses from moving properties because tax is based on purchase price regardless of when that purchase took place. Transitioning to a CVT would also require significant upheaval and inevitably inflate appeals as ratepayers query entirely new valuations of land and property.

35 How can land and property be valued fairly and efficiently under a CVT in England? What evidence is available to do this?

Separating land from property would be intrinsically difficult as there are no datasets providing that distinction available. The Californian system uses market value at time of purchase – based out of purchase price and surveyor valuations. This is the easiest way but does not provide a true separation.

36 How would replacing business rates with a CVT affect the distribution of taxation?

The details of a CVT proposal would determine its impact on the distribution of taxation. The Californian system is not pegged to fiscal neutrality and could theoretically be less burdensome for business. This review has rightly already committed to move from fiscal neutrality to reduce the burden of business rates on business. This could be achieved within the business rates system by introducing an online sales levy or bespoke rating methodology for property used by online retailers to reduce the multiplier for retailers.

37 What are the likely implications of moving the liability for tax from tenant to landowner or property owner? How could the government ensure effective collection from and compliance by these taxpayers?

Moving the liability for tax from tenant to property owner would subvert the theoretical argument around capitalisation of reliefs into rents. However, a lower CVT for owners would not automatically translate to lower rental costs for occupying businesses – this will be largely determined by the performance of the commercial property market. The call for evidence has already identified possible issues with levying a CVT at property owners based abroad; a strong anti-avoidance framework would be required which could include paying rates as a pre-condition of licences and/or permissions needed to trade.

38 What lessons can be learned from other countries experiences with CVTs?

There is no consensus on the merits of CVT or preference over business rates systems. California State is in fact debating moving away from its CVT towards a business rates system based on frequent revaluations

and revised appeals processes. One reason this debate is ongoing is the perceived need to base the tax on current market values¹⁰.

39 What other international alternative approaches to the taxation of non-residential land and property merit consideration for England?

We support the Government's assessment of the need to retain the primary method of business taxation based on property values. Issues with the business rates system are not intrinsic to the tax itself. This review should therefore consider amendments to the existing system to reduce burdens on retailers, incentivise investment and support access to local services.

40 What would be the benefits and risks of introducing an online sales tax?

An OSL could be introduced to raise additional revenue from online retailers to fund a reduction in rates bills for bricks and mortar retailers. Business rates bills are rising faster than other taxes and the system has not responded to the rise of online retailing, undermining the viability of high street and local services. This is acutely felt in the retail sector due to low margins and intensive use of property.

The OSL would allow the same revenue to be raised by government more fairly and across a wider number of businesses. Using OSL revenues to reduce bills for retailers would support local services, recognising the key role high streets play as social and economic hubs. An OSL would not affect the coherence of the tax system, would retain competitiveness, and support the sustainability of the business rates system.

An alternative approach to addressing the disparity between tax paid by online and bricks and mortar businesses is a bespoke rating methodology for property used by online businesses such as distribution warehouses, within the existing business rates system. The use of different rating methodologies to establish market rental value is already common in other important sectors where the economic value of the business is not reflected in property values as traditionally determined in the rating system, such as pubs, restaurants and petrol forecourts, which are based on the receipts and expenditure model.

41 Which services and products do stakeholders think should be subject to an online sales tax and what evidence is there to support this?

Broadly all online retail sales should be subject to an OSL, unless they involve physical retail property, for example click and collect services should be exempt. An exemption could apply to small online businesses based on turnover to encourage innovation. This could be set at £500,000 with another exemption for goods collected in store on the principle that sales involving physical infrastructure should be excluded.

42 What evidence is there for the effects of an online sales tax, for example, on changes in consumer behaviour, or prices?

An OSL could be applied to revenues rather than transactions, which would mean businesses would pay rather than the OSL forming a direct tax on consumers. Some of these costs could be passed onto consumers, but similarly reduced business rates bills for bricks and mortar stores could lead to reduced consumer prices. The design of an OSL could be fiscally neutral to sit on top of the business rates system, which would therefore make the consumer price impact neutral overall.

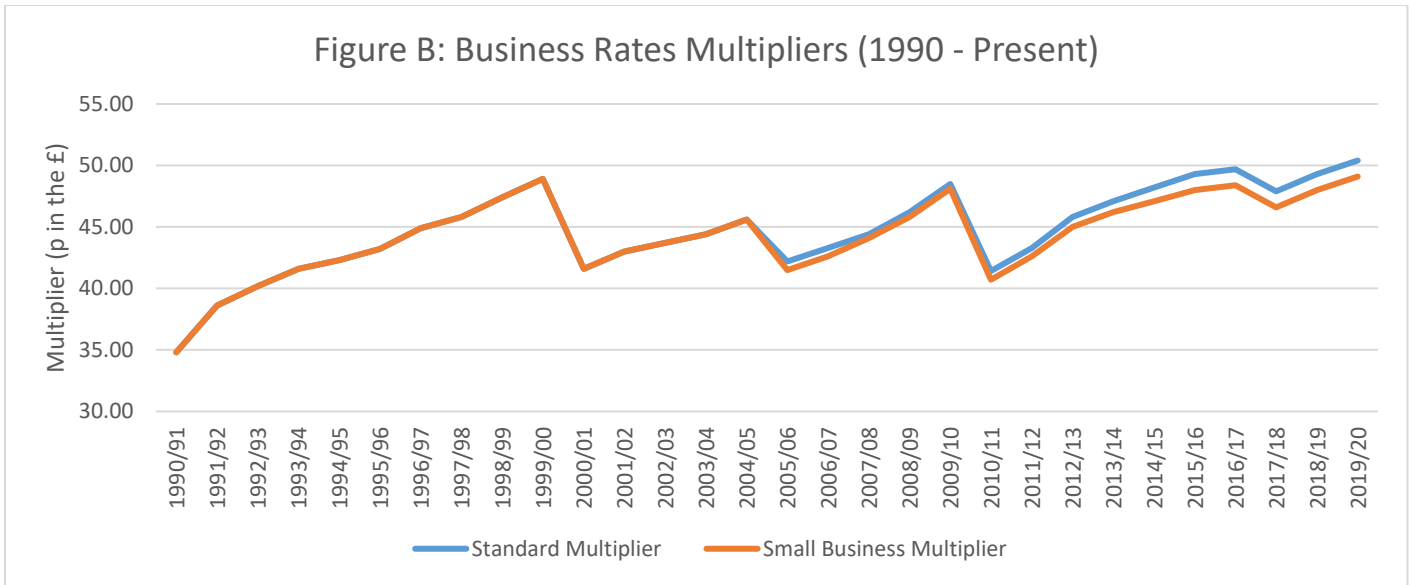
43 How could an online sales tax affect the distribution of taxation?

An OSL would help realign the currently distorted distribution of taxation within the retail sector between online and property-based businesses. The House of Commons Housing, Communities and Local Government Select Committee has estimated that business rates for some online retailers are 0.7% of turnover compared with 1.5% - 6.5% for bricks and mortar retailers¹¹. The graph below illustrates how multipliers have increased significantly, especially since the 2010 revaluation.

¹⁰ <https://www.gtlaw.com/en/insights/2020/8/california-voters-to-decide-whether-to-increase-property-taxes-commercial-industrial-properties>

¹¹ <https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/1010/1010.pdf>

Figure B: Business Rates Multipliers (1990 - Present)



Using an OSL to fund reductions in the multiplier for retailers would reverse the increasingly unsustainable incidence of the tax. UK property taxes remain the highest amongst OECD nations and contain an unintended motivation exists for commercial to residential conversions¹². As the business rates system is currently fiscally neutral, the loss of commercial property increases tax incidence for remaining ratepayers. However, council tax is not fiscally neutral and new residential property means more revenue. From 2013/14 to 2018/19, annual business rates revenues have increased by 8% compared to 17% for council tax¹³. This further underlines the need to break the principle of fiscal neutrality in the business rates system to reduce the total burden on retailers.

For more information on this submission, please contact ACS Public Affairs Manager Steve Dowling via steve.dowling@acs.org.uk / 01252 533009.

¹² <https://www.telegraph.co.uk/business/2016/12/12/uk-has-highest-property-taxes-developed-world/>

¹³

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/743732/Collection_Rate_Statistics_Release_June_2018_-_Revised_2.pdf

ABOUT ACS

The Association of Convenience Stores lobbies on behalf of over 46,000 convenience stores across mainland UK on public policy issues that affect their businesses. ACS' membership is comprised of a diverse group of retailers, from small independent family businesses running a single store to large multiple convenience retailers running thousands of stores.

Convenience stores trade in a wide variety of locations, meeting the needs of customers from all backgrounds. These locations range from city centres and high streets, suburban areas such as estates and secondary parades, rural villages and isolated areas, as well as on petrol forecourts and at travel points such as airports and train stations.



WHO WE REPRESENT

INDEPENDENT RETAILERS



ACS represents almost 19,000 independent retailers, polling them quarterly to hear their views and experiences which are used to feed in to Government policy discussions.

These stores are not affiliated to any group, and are often family businesses with low staff and property costs. Independent forecourt operators are included in this category.

SYMBOL GROUPS AND FRANCHISES



ACS represents over 14,000 retailers affiliated with symbol groups. Symbol groups like SPAR, Nisa, Costcutter, Londis, Premier and others provide independent retailers with stock agreements, wholesale deliveries, logistical support and marketing benefits.

Symbol group forecourt operators and franchise providers like One Stop are also included in this category.

MULTIPLE AND CO-OPERATIVE BUSINESSES



ACS represents over 13,000 stores that are owned by multiple and co-operative retailers. These businesses include the Co-Operative, regional co-operative societies, McColls and others.

Unlike symbol group stores, these stores are owned and run centrally by the business. Forecourt multiples and commission operated stores are included in this category.

THE CONVENIENCE SECTOR



In 2020, the total value of sales in the convenience sector was £44.7bn.

The average spend in a typical convenience store transaction is £7.46.



There are 46,955 convenience stores in mainland UK. 72% of stores are operated by independent retailers, either unaffiliated or as part of a symbol group.



The convenience sector provides flexible employment for around 412,000 people.

13% of independent/symbol stores employ family members only.



22% of shop owners work more than 60 hours per week, while 24% take no holiday throughout the year.

72% of business owners are first time investors in the sector.



Convenience stores and Post Offices poll as the two services that have the most positive impact on their local area according to consumers and local councillors.

80% of independent/symbol retailers have engaged in some form of community activity over the last year.



Between August 2019 and May 2020, the convenience sector invested over £585m in stores.

The most popular form of investment in stores is refrigeration.

OUR RESEARCH

ACS polls the views and experiences of the convenience sector regularly to provide up-to-date, robust information on the pressures being faced by retailers of all sizes and ownership types. Our research includes the following regular surveys:

ACS VOICE OF LOCAL SHOPS SURVEY

Regular quarterly survey of over 1,200 retailers, split evenly between independent retailers, symbol group retailers and forecourt retailers. The survey consists of tracker questions and a number of questions that differ each time to help inform ACS' policy work.

ACS INVESTMENT TRACKER

Regular quarterly survey of over 1,200 independent and symbol retailers which is combined with responses from multiple businesses representing over 3,000 stores.

ACS LOCAL SHOP REPORT

Annual survey of around 2,400 independent, symbol and forecourt retailers combined with responses from multiple businesses representing 6,700 stores. The Local Shop Report also draws on data from Lumina Intelligence, IGD, Nielsen and William Reed.

BESPOKE POLLING ON POLICY ISSUES

ACS conducts bespoke polling of its members on a range of policy issues, from crime and responsible retailing to low pay and taxation. This polling is conducted with retailers from all areas of the convenience sector.

For more information and data sources, visit www.acs.org.uk