

Responses received to consultation on Article 4 Direction for changes of use from A1 (shops) to A2 (financial and professional services):

1. Belgravia Residents Association
2. Business Improvement Districts¹
3. Individual
4. Highways England
5. Historic England
6. Metrobank
7. Natural England
8. Office of Road and Rail
9. Pimlico Grid Residents Association
10. Shireconsulting
11. Transport for London

¹ Baker Street Quarter Partnership, Heart of London Business Alliance, New West End Company, The Northbank, Paddington Now, Victoria Business Improvement District

Belgravia Residents Association

Thank you for this valuable piece of information.

Our members will be happy with this move by the City Council

Kind Regards

Chair
Belgravia Residents Association

Article 4 consultation – Change of Use from A1 to A2

Via email to: planningpolicy@westminster.gov.uk.

4 December 2015

Response

On behalf of the Business Improvement Districts (BIDs) operating within Westminster, we are pleased to respond to Westminster City Council's consultation on the introduction of an Article 4 Direction for changes of use from A1 (shops) to A2 (financial and professional services) within the Core Central Activities Zone and designated shopping centres.

Collectively we represent the interests of over 2,000 businesses in Westminster and have a strong record of actively contributing to the Westminster – and the UK's economic growth.

We very much share the concerns of the City Council regarding the introduction by central government of a prior approval mechanism for the change of use of premises from A1 to A2. As a point of principle, we agree that the decision on whether to permit a change of use of this type in our shopping centres should ultimately rest with the planning authority, which is most familiar with the needs of its local area.

From our experience, the most important thing is retaining the right mix of commercial premises in order to retain the economic vibrancy of our areas. This vibrancy would be put at risk in the Core Central Activities Zone and identified shopping centres should the Article 4 Direction not be introduced.

The need to support A1 uses is particularly important as we know that A2 uses can often command higher rents for property owners. With this financial incentive, if we were to see a significant number of unrestrained changes of use from A1 to A2 use, we could place at risk the vibrancy and attractiveness of our shopping streets to visitors and residents. Furthermore, unrestrained changes could dilute central London's global reputation as the place to shop.

We accept that changes of use from A1 to A2 may be appropriate in those parts of Westminster which are not identified in the consultation. However, we believe that applications for changes in the Core Central Activities Zone and identified shopping centres should ultimately be assessed on their merits by the local authority.

We are therefore pleased to support the City Council's proposed introduction of an Article 4 Direction.

Individual

It is my view, based on historic outcomes and the status quo as I see it in most shopping locations, that any attempt by Planning Departments to micro manage shop mix in any given location are likely to create more negative than positive outcomes and will create expensive bureaucratic costs to no overall benefit to local communities.

It is also likely there will be a great many, perhaps wholesale closures of high street banks and building societies in the next ten years, so there will be no shortage of properties already with permission such that demand for new locations / change of use will be minimal.

The current proposals by Westminster Council seem to me to be a case of dealing with both the wrong and yesterday's "problem".

19/11/15

For the Attention of: Councillor Robert Davis MBE DL

Consultation: Article 4 Direction for changes of use from A1 (shops) to A2 (financial and professional services)

Dear Councillor Davis,

Thank you for your email dated 30 October 2015, advising Highways England of the above consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN).

Having examined the above documents, we do not offer any comment to this proposal.

Sent on behalf of Stephen Hall (Asset Manager) at Highways England

Andree Gregory

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Web: <http://www.highways.gov.uk>



Historic England

Colette Willis
Policy, Performance and Communication
Westminster City Council
19th Floor, City Hall
64 Victoria Street
London, SW1E 6QP

Our ref: HD/P 5034/54

14 December 2015

By email: planningpolicy@westminster.gov.uk

Dear Ms Willis,

Article 4 Direction for changes of use from A1 (shops) to A2 (financial and professional services)

Thank you for consulting Historic England on the proposed Article 4 Direction to bring change of use from A1 (shops) to A2 (financial and professional services) within planning control.

As the Government's adviser on the historic environment Historic England is keen to ensure that conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the planning process. Historic England supports the proposed Direction which will enable suitable assessment of the contribution of retail uses to the character and vitality of Westminster's town centres and shopping streets. It is noteworthy that the vitality of traditional shopping streets is closely allied with the Borough's exceptional heritage, and that vibrant town centres support the identity and significance of London's historic places.

Yours sincerely,

Katharine Fletcher
Historic Environment Planning Adviser
E-mail: katharine.fletcher@HistoricEngland.org.uk
Direct Dial: 020 7973 3771



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HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



Policy and Strategy - Westminster City Council,
15th Floor, City Hall,
64 Victoria Street,
London
W1E 6QP

Sent via post & e-mail: planningpolicy@westminster.gov.uk

14 December 2015

To Whom It May Concern

Westminster City Council: Article 4 Consultation on Change of Use from A1 to A2

Metro Bank was founded in London five years ago. Today, we are the fastest growing bank in Europe, and an example of how start-ups can flourish in the world's capital city. We employ 2,000 local people, lend in excess of £1.5bn to local SMEs, and are rated the No1 bank in the UK by Fairer Finance.

However, our growth is being put at risk by the proposal to reverse the changes to the national planning law made in 2014, which enabled banks to convert shops into branches without the need for planning consent.

Incumbent banks continue to close branches across the country, including 22 in Westminster in the last two years, with just eight rising in their place to replace them. The changes you propose would stifle competition by making it harder for the smaller banks which are trying to gain a foothold on the high street.

We need more competition in banking – not less. We would ask you to look carefully at the attached document, which seeks to destroy the misconception all banks are the same.

We will be following up our submission with approaches to stakeholders across the City of Westminster and would greatly value your assistance in raising this issue and preventing this change in planning regulation.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Craig Donaldson'.

Craig Donaldson
Chief Executive Officer
Metro Bank PLC

cc. Calum Ewing, Head of Property, Metro Bank PLC



40 Stores Now Open

Opening soon in King's Road,
Bexleyheath, Chelmsford and Wimbledon



Metro Bank Representations to Westminster City Council
Article 4 Consultation on Change of Use from A1 to A2

14 December 2015



Executive Summary

This document is an objection to the proposed Article 4 Direction removing Permitted Development rights for changes of use from A1 (shops) to A2 (financial and professional services) in the Core Central Activities Zone (Core CAZ) and designated shopping centres in the City of Westminster.

We can appreciate that old fashioned banks and incumbents have given banking a terrible name. With our focus on customer satisfaction, new store openings and a very clear point of sales offer and fantastic service, we are actively reversing this poor reputation for banks. The proposed Article 4 Direction will provide further barriers for any bank wanting to open in new locations and growing a physical presence across the City of Westminster. It will certainly restrict our ability to provide fantastic and convenient retail banking services and serve our customers in Westminster.

Metro Bank's view is that banking is an essential service and that banks are a cornerstone of the high street. Customer experience and engagement via the store and multi-platforms is at the core of our retail model. Customers can open an account in just 15 minutes (and receive their debit cards printed in store!) and use other services such as the Magic Money Machine and Safety Deposit Boxes – all of which provide a point of sales service and retail experience for our customers.

Metro Bank brings extensive economic benefits to local communities and the local businesses we serve, and additional employment opportunities which exceed those of estate agencies and employment agencies. As such, we strongly believe that banks should be considered independently from other A2 uses, as they were by Government in the 2014 Permitted Development Right Class CA, and not be restricted by this proposed Article 4 Direction.

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1. Introduction

Westminster City Council (WCC) has given notice of the making of a non-immediate Article 4 Direction intended to remove the permitted development rights for change of use from A1 (shops) to A2 (financial and professional services) in the Core CAZ and designated shopping centres in the City of Westminster. This Article 4 Direction would bring these types of development within the control of the planning process.

Representations to the Article 4 Direction may be submitted within the six weeks consultation period that began on 30 October 2015 and ends on 14 December 2015. WCC envisages the direction would come into force, subject to representations received, in October 2016.

2. Background

Purpose of the Article 4 Direction

The 9 October 2015 Report¹ to WCC Cabinet states that the reason for serving the Article 4 Direction is to enable the Council to continue to protect the retail function of key shopping areas using the policy framework provided by the statutory local plan to determine planning applications for changes of use from A1 (shops) to A2 (financial and professional services) in the Core Central Activities Zone (CAZ) as well as other designated shopping centres outside of the Core CAZ.

The report states (para 4.3) that the National Planning Policy Framework (NPPF) advises that “the use of Article 4 Directions to remove national Permitted Development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area” (para. 200). In order to make a new Article 4 Direction the legal requirement is that the local planning authority is “satisfied that it is expedient that development should not be carried out unless permission is granted”.

Westminster acknowledges that whilst A2 uses can complement A1 shops and provide a valued service in shopping areas, WCC argues that the over concentration of uses other than A1 shops can reduce the vitality and viability of shopping areas and the permitted development right removes the council’s ability to apply its policy framework. Although the Cabinet Report contains no evidence that the Council has identified a particular problem with Class A2 bank uses in terms of impacts on local amenity or the wellbeing of a particular area or areas, the Council considers that making an Article 4 Direction will enable the retail

¹ City of Westminster Cabinet Member Report, 9 October 2015
<http://committees.westminster.gov.uk/documents/s15092/CM%20Report.pdf>

function of shopping centres to be protected, and where appropriate to continue to allow flexibility for changes of use to other town centre uses.

Legislative Changes – History

Background on the legislative changes and consultation carried out by Government prior to the April 2015 GPDO changes now in force (allowing a permitted change of use from Class A1 to Class A2) is set out below:

- *Temporary Class CA* - the April 2014 Town and Country Planning (General Permitted Development) (Amendment and Consequential Provisions) (England) Order 2014 introduced a new Class CA allowing conversion of retail (A1) uses to a “deposit taker” use, i.e. a bank, building society, credit union or friendly society (subset of Class A2). Planning permission was required for external changes, and the provision required notification of the LPA after the new use had commenced.
- *The July 2014 Technical Consultation* - the former Coalition Government’s July 2014 Technical Consultation on Planning proposed a number of new permitted development rights with the aim of reducing planning regulations on businesses, to increase their flexibility in adapting existing premises to meet changing demand and changes to support growth and to re-invigorate the high street. The consultation proposed amending the General Permitted Development Order (GPDO) and Use Classes Order (UCO) to form a wider retail class, containing shops, banks and estate agents but excluding betting shops and pay day loan shops. The Consultation expounded that as high streets evolve and businesses adapt to changes in shopping habits and the way that people use their high street, the impacts of A1 and A2 use on an area have become increasingly similar, for instance in regard to banks.

3. Introducing Metro Bank

Metro Bank is the first new bank to open on the high street in over 100 years. The ethos of the bank is putting the customer experience at the forefront of its operations. Each of our stores is open seven days a week (8am-8pm on Monday to Friday, 8am-6pm on Saturday and 11am-5pm on Sunday), 362 days a year and each store serves the local community in which they are located providing the most convenient retail banking service on the market.

We opened our first store in Holborn (2010) and in the past five years we have grown to 40 stores across London and the South East (Appendix 1). Our ambition is to open more stores across the region (up to 200



stores). The appearance of the store is not like the existing banks on the high street, as can be seen from the photos in Appendix 2. The shopfront is open and fully glazed allowing customers to look into the open plan internal layout where the frontage positively interacts with the streetscape which is similar to other retail uses (Appendix 3).

When acquiring new stores we work closely with landlords and each local authority to help create an efficient and prominent retail store. This helps to promote the viability and vitality of town centres which helps to maintain and increase footfall.

Metro Bank has a key role in the local community through the following:

- Each Metro Bank store actively employs 25-30 staff from the local community. A banking background is not required, instead we prefer staff to have retail experience where we can provide the training for colleagues to give customers a fantastic service and banking experience;
- Metro Bank works with the local Chambers of Commerce, Business Improvement Districts, charities and also schools as part of its Money Zone Programme;
- Each store holds regular networking events to help support local businesses; and
- Each new store costs c. £4 million to fit out and leases are 25 years in length. Therefore this is a long term investment in and commitment to the local community.

We have seen record growth for a retail bank, with highlights from the third quarter of 2015 up to 30 September 2015 (Appendix 4), as follows:

- Total deposits grew to £4.387 million – a record quarterly increase of £596 million (16%) from £3.791 million as at 30 June 2015, representing year-on-year growth of 87%;
- Total gross loans climbed to £2.999 million – a record quarterly increase of £798 million (36%) from £2.201 million as at 30 June 2015, representing year-on-year growth of 116%.
- Customer acquisition remains very strong, increasing by a quarterly record of 57,000 accounts, helping the total number of personal and business customer accounts to surpass 601,000.

We have also been featured in much press and social media coverage (Appendix 5 & 6) and received numerous awards for our service (Appendix 7).

From our experience it is clear that a strong store portfolio is part of the retail/business mix that our customers (or as we like to call them, FANS) value greatly (Appendix 8). This is similar to any retailer who in today's market will offer their services via their store network, contact centres, on-line, mobile and in some

instances drive-thru. This is exactly what Metro Bank does – executes a retail delivery plan fanatically and fantastically well. And we do this because we know our customers love and value this choice (Appendix 9). Indeed, this is the same across the wider banking market, where a recent KPMG report² highlights that for a retail and business banking perspective, a branch network is regularly considered as an important channel for customers to have access to, particularly in relation to the provision of the primary current account. Indeed, this report emphasises that 57% of banking customers themselves³ believe access to a branch (or store) is important, even if they choose not to use branches.

4. Metro Bank's Objections to Proposed Article 4 Direction

We object to the proposed Article 4 Direction removing permitted development rights for changes of use from A1 (shops) to A2 (financial and professional services) in the Core CAZ and designated shopping centres.

As Britain's first new retail bank in over 100 years, we are particularly concerned by the WCC's Article 4 Direction and view the removal of Schedule 2, Part 3, Class D permitted development across all Class A2 uses as overly restrictive, unnecessary and contrary to national guidance.

Indeed, we believe that WCC has not carried out sufficient research into the growth (or otherwise) of banks across the City of Westminster and assessed what the actual impact is likely to be on the continued retention of the Permitted Development rights. We also consider that a fuller assessment of what banks offer their customers should have been undertaken by WCC as part of a wider consideration of the A2 use class. As a consequence, the economic benefit to an area of a bank's presence seems to be considered equal to that of an estate agent or an employment agency. Banks and building societies operate and deliver a function to local economies that fundamentally differs from other professional or A2 uses, where again this does not seem to have been considered by WCC.

Westminster City Council's Justification

WCC's Cabinet Member Report⁴ states that the Council considers the proposed Article 4 Direction to be necessary to protect the retail function of shopping centres and their vitality and viability. It considers that "unrestricted loss of A1 uses could undermine the vitality and viability of the predominately retail focus of

² 'The Game Changers' – Challenger Banking Results, May 2015 (KPMG)

³ YouGov poll for British Bankers' Association, 2014

⁴ City of Westminster Cabinet Member Report

<http://committees.westminster.gov.uk/documents/s15092/CM%20Report.pdf>



these centres.” (para. 4.9). We do not advocate the unrestricted loss of A1 uses, but rather wish to establish the differentiation between banks and other A2 uses such as estate agencies and employment agencies.

WCC’s Cabinet Report does not consider the differences between these uses. Metro Bank brings extensive economic benefits to local communities and local businesses, and additional employment opportunities which exceed those of estate agencies and employment agencies. As such, we strongly believe that banks should be treated independently, as they were by Government in the 2014 Permitted Development Right Class CA.

WCC reiterate that A2 uses will undermine the vitality and viability of A1 frontages and retail centres, however the evidence behind this assertion does not reflect specific consideration of banks. Indeed, the Council’s position that **all** A2 uses will undermine vitality and viability appears to be held in the absence of any real evidence to justify this view, which we suggest may be open to challenge.

All of our stores have very long opening hours, multi-channel sales and a very clear point of sales offer and fantastic service. Metro Bank closely follows the principles established in retailing, not banking, and therefore more closely reflects an A1 use than A2 financial and professional services including the following - all of which are virtually unique from existing high street banks:

- Customers can open an account in just 15 minutes and receive their debit card (credit card and cheques as well!) printed in every store;
- Coins can be counted commission free by using our the Magic Money Machines – in every store;
- Safety Deposit Boxes can be rented and accessed at any time in every store with no appointment needed;
- Applications for mortgages and loans can be made in every store at any time – no appointment is needed.

We believe that Metro Bank is more of a retail model than most retailers execute. All of our stores are fully glazed to promote footfall and create an active frontage for the benefit of the high street. Unlike many other retailers, we never use vinyls or block the views into our stores and therefore generate a higher footfall than many other retailers. Our approach is that of a retailer, not a traditional bank, and the proposed Article 4 Direction, by introducing a blanket restriction on A2 permitted development rights, will not reflect this fact. Indeed, WCC does not appear to consider the functions of what a bank does, how it serves its community and what its impact on the vitality of the locality really is.

Within District Shopping Centres, the Cabinet Member Report considers that the unrestricted loss of A1 uses could reduce the range of local shopping facilities, particularly convenience shopping. We strongly disagree with this, and consider that banks form a vital local service for communities which complement existing shops. On this basis, it is our view that WCC should consider banks separately from other A2 uses, such as estate agents and employment agencies, which do not contribute to the vitality of the high street with high footfall and active frontages.

We do not consider that WCC have demonstrated that banks, and in particular retail challenger banks, should not benefit from the permitted development rights afforded to them unless permission is granted.

Threat to Choice and Competition

In serving the Article 4 Direction, Westminster's approach ignores the commercial needs of a significant proportion of the CAZ and designated shopping centres to respond to the changing face of retail by adopting a flexible approach to their future role.

Paragraph 23 of the NPPF states that Local Planning Authorities should promote competitive centres, provide customer choice and a diverse retail offer which reflects the individuality of centres. Customers expect more from their shopping experiences and there is pressure on centres to reinvent and respond to this expectation. The NPPF also attaches significant weight to supporting economic growth through the planning system, noting that investment should not be overburdened by the combined requirements of planning policy expectations and that centres should be resilient to anticipated future economic changes.

In respect of Class A2, this national level policy position to promote competitive centres and provide customer choice and a diverse retail offer was born out by the General Permitted Development Order change introduced from 6 April 2014 to enable flexibility between A1 and A2 uses.

Our view is that banking is an essential service and that, alongside chemists, post offices and food stores, banks are a cornerstone of the high street. As an essential high street service, banks should operate in a similar manner to modern retail, lifestyle and leisure uses in retail centres around London and the wider UK. This progressive approach to banking, with extended opening hours, excellent customer engagement and experience via store and multi-platforms is core to the operation of Metro Bank.

In removing permitted development rights in relation to all Class A2 uses including banks and building societies, WCC's proposed Article 4 Direction will restrict competition, favouring incumbents and preventing investment in CAZ and designated shopping centres. The Article 4 Direction will result in banks (especially



new entrants to the market) in Westminster being heavily disadvantaged when it comes to securing prime high street properties and locations. This lack of choice and completion is not healthy. In addition, a variety of retailers currently provide banking and financial services via A1 (use) retail properties, including the Post Office, food stores and department stores. This does not provide a level playing field for new entrants into retail banking.

Potential Block to Investment

Lending by retail banks and the economic growth that this can stimulate will remain limited until the planning system removes restrictions on retail banks who seek to expand and invest. The WCC Article 4 Direction will mean it will be extremely time consuming to obtain a planning permission for a change of use, with the application process resulting in uncertain and inconsistent outcomes. A result of this is that landlords of prime retail properties are often reluctant to consider a lease to a bank as there may be a significant amount of time (during the change of use application) when they will not be receiving any rent.

Banks such as Metro Bank, wishing to bring employment and economic opportunities to a local area and have a competitive model, do not want to simply move into existing bank properties (which are often small, badly configured and not designed for modern retail purposes) will be forced to go through the planning process and secure a change of use. From Metro Bank's experience, prior to the April 2014 Permitted Development 'deposit taker' changes the process to secure planning permission took an average of 6 - 12 months and could cost the bank up to £75,000 to £100,000 per store. This level of financial investment did not, however, guarantee that a change of use would be granted and, as a result, a bank or building society wishing to occupy an A1 space was forced to carry a significant financial risk per site.

We have opened and entered into agreements to open 15 new stores in what were previously Class A1 retail units since April 2014 making use of the Permitted Development right and without a requirement to apply for planning permission for a change of use. This amplifies the need to maintain this policy for banks, as removing or restricting it at all risks stifling competition, placing major barriers to new entrants and effectively limiting the choice the customer will have in terms of the banks that they can choose from.

In applying for planning permission for the change of use from A1 to A2 prior to the Permitted Development right being introduced, numerous Local Planning Authorities have recognised the similarities between Metro Bank's service and that of traditional A1 retail uses:

"It is considered that a retail bank can increase footfall and can assist in maintaining the vitality of a centre. The proposal is therefore considered acceptable in that it would offer a service to visitors and would not have a significant impact on the retail function of The Glades Shopping Centre." London Borough of Bromley.

"Impact on the viability and vitality of the local centre: ... The proposed change of use of the application property to a bank will help diversify uses within the local centre. The introduction of a bank will provide a wider range of facilities for local residents to use thereby helping to increase the vitality and viability of the local centre." Milton Keynes Council.

Health of Banking in Westminster

Nationwide, The Campaign for Community Banking Services (CCBS) identifies that 2,750 bank branches have closed in the past 10 years. Approximately 500 bank branches closed in 2014, following 222 in 2013 and a further 650 closures are estimated in 2015.⁵

Research demonstrates that there has been a net loss of 14 bank and building society branches in Westminster alone over the past five years. The table below, using data provided by The Local Data Company, identifies the number of bank and building society branches which have opened and closed since 2011.

Year	Opened	Closed	Net loss/gain
2011	8	6	2
2012	2	7	-5
2013	9	6	3
2014 (Pre-PD)	1	1	0
2014 (Post-PD)	2	11	-9
2015	6	11	-5
Total	28	42	-14

Source: The Local Data Company. 2015.

The full LDC data is included at Appendix 11. It is evident from this research that whilst there was a net increase in banks and building societies within Westminster between 2011 and 2013 the introduction of Permitted Development rights allowing the change of use from Class A1 to A2 has not resulted in any further

⁵ <http://www.communitybanking.org.uk/report-reduction-2015.htm>



growth (and certainly not a proliferation) of A2 bank and building society uses to the detriment of the CAZ and retail centres. In fact, more banks are closing across the City of Westminster than are opening.

Crucially, during the period since the Permitted Development right was introduced in April 2014, 22 banks or building societies have closed branches or stores across the City of Westminster. Only eight new banks opened. This is hardly a proliferation of banks and is at odds with the supposed purpose of the proposed Article 4 Direction and is factual evidence that seems to have been either overlooked or not considered by WCC.

5. Metro Bank's Proposal

In view of the above, Metro Bank recommends that Westminster City Council modifies and re-serves the Article 4 Direction to exclude Class A2 banks and building societies, to allow these 'deposit taker' uses to continue to benefit from permitted development rights under Schedule 2, Part 3, Class D of the 2015 GPDO. This change to the Article 4 Direction would bring about the following direct benefits:

- Creation of a new generation of banks and building societies in a more expedient and cost effective manner;
- Improvement in competition, service, reliability, opening hours and choice for communities and customers;
- Creation new jobs and bring fresh investment, especially to the SME sector; and
- Bringing about an improvement in the reputation that retail banks currently have in our society.

Although we are supportive of Westminster City Council's wish to control the proliferation of certain Class A2 professional service such as estate and employment agencies that do not provide an essential service that sits alongside chemists, post offices and food stores, Metro Bank **strongly objects** to Westminster City Council's blanket removal of permitted development rights for all Class A1 to A2 changes of use. Metro Bank's view is that the Article 4 Direction should not remove A1 to A2 permitted development rights in respect of banks and building societies given these 'deposit taking' occupiers amount to an essential service that, alongside chemists, post offices and food stores, are a cornerstone of the high street.

We can appreciate that old fashioned banks and incumbents have given banking a terrible name. The typically poor customer environment, with low footfall, poor customer satisfaction and the closure of existing stores have all contributed to this tarnished reputation for banks. This Article 4 Direction proposed

by WCC will only exacerbate this challenge – the exact opposite of its intentions – and restrict our ability to help reverse this reputation.

6. Planning Policy Adopted by the City of London: Banks and Building Societies

Notwithstanding Metro Bank's objection to the Article 4 Direction being consulted upon, an alternative would be for Westminster to move to adopt a more progressive planning policy position in terms of the acceptability of banks and building societies within CAZ and designated shopping centres along the lines of the policy approach already adopted by the City of London.

Policy DM 20.1 of the City of London Local Plan (Adopted January 2015) combines Class A1 retail and Class A2 'deposit taker' uses together meaning these uses are considered **equally appropriate** within Principle Shopping Areas.

7. Summary

Metro Bank considers that the Article 4 Direction as currently served is inconsistent with national guidance and particularly NPPF paragraph 23 that encourages Local planning authorities to plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work.

We do not consider that WCC has assessed the economic, employment and service benefits of modern retail banks such as Metro Bank.

Our view is that the Article 4 Direction and will

- Block the opening of new banks and building societies considered to be an essential part of the high street, reducing choice and competition directly impacting on customers;
- Result in banks in Westminster being heavily disadvantaged when it comes to securing prime high street properties and locations;
- Will maintain an unfair playing field, where a variety of retailers currently provide banking and financial services via A1 (use) retail properties, including the Post Office, food stores and department stores.



The data provided by the Local Data Company demonstrates that there has not been a proliferation of bank and building society openings across the City of Westminster since the permitted development regime changes in April 2014 – indeed there has been a net loss in banks during this period. Therefore, we believe the Article 4 Direction as drafted is inappropriate and should be re-served to exclude banks and building societies (ie. deposit takers)

We have previously engaged with the Secretary of State and key stakeholders in July 2014 Technical Consultation and will seek to continue this discussion with stakeholders around the City of Westminster and London in the context of this proposed Article 4 Direction.



8. Appendices

Appendix 1: Metro Bank Stores Map

Appendix 2: Metro Bank – Before & After Photos

Appendix 3: Metro Bank’s – Store Requirements

Appendix 4: Metro Bank’s 3rd Quarter 2015 Press Release

Appendix 5: Press Coverage

Appendix 6: Social Media Coverage

Appendix 7: Metro Bank’s Awards

Appendix 8: Metro Bank: FANS Not Customers

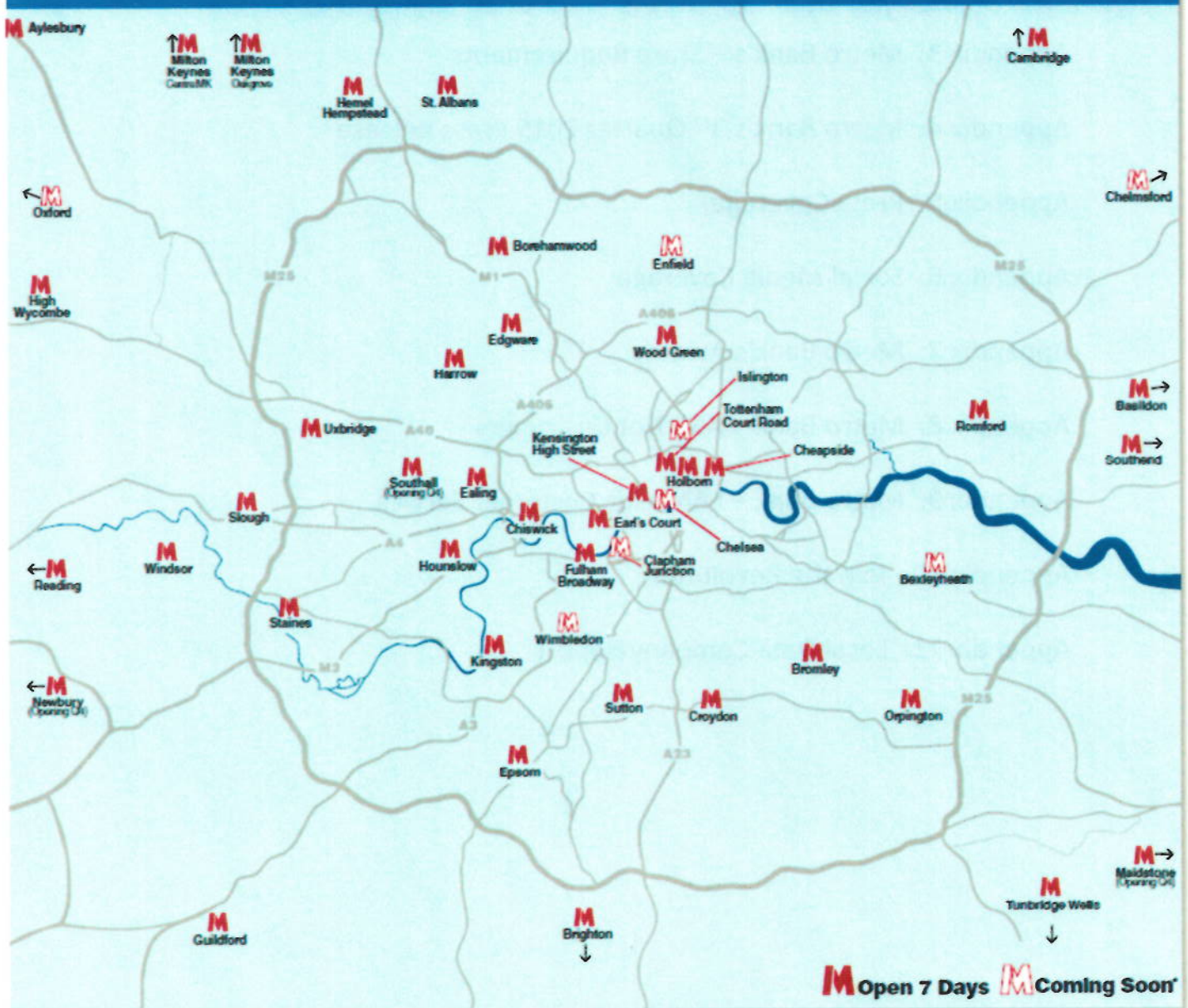
Appendix 9: Metro Bank – FANTastic Customer Service

Appendix 10: Join the Revolution

Appendix 11: Local Data Company Report

Appendix 1: Metro Bank Stores Map

If we are not in your area... **We will be soon!**



Appendix 2: Metro Bank – Before & After Photos

Cheapside



Kensington High Street



Kensington
Opened 6 May 2011

Tottenham Court Road



Holborn



King's Road-to open in 2016



Appendix 3: Metro Bank's – Store Requirements





M Coming Soon



London - inside M25

- Camden
- Clapham High Street
- Collins Wood
- Crouch End
- East Croydon
- Edgware Road
- Purley Way
- Putney
- Richmond
- Stratford
- Surbiton
- Tooting
- Twickenham
- Walthamstow
- Walford
- Wembley

South East

- Ashford
- Basingstoke
- Bedford
- Brantwood
- Brighton - 2nd store
- Cambridge - 2nd store
- Colchester
- Crawley
- Dartford
- Harlow
- Henley-on-Thames
- Ipswich
- London Colney
- Luton

- Maldenhead
- Milton Keynes-Bletchley
- Northampton
- Oxford-Bolton Road
- Oxford-Cowley
- Reading - 2nd store

- Sevanceku
- Slavaniga
- Thumrock
- Wolding

West & Coastal

- Bath
- Bristol
- Eastbourne
- Harlow
- Havre
- Portsmouth
- Southampton
- Swindon
- Winchester
- Worthing

Case Interact & Inspire

With 40 stores now open, we aim to serve every community in complete
monopolization with 600 stores. If we are not in your area - we will be soon!

Our model is unparalleled service and convenience, no product sales,
7 day-a-week branch banking, 24/7 call centres with real people answering
the phone and a team of specialists every step of the way.

As a small business bank, your local banker is in many communities, serving the consumer and business requirements while supporting the civic efforts of the community to achieve economic and social development.

Our Private Banking is dedicated to the unique needs of Private Banking customers, providing service, not product sales.

Britain has embraced the Metro Mark launch. Our thanks to our FRAS customers who join the Revolution and provide the strength of our stores today.

We invite you to join the Revolution and vote for our cause.

www.fishbase.org

Veron W. Hill II
Chairman & Founder

Caleb Donaldson
CEO

Chief Executive Officer

- Minimum of 9,500 sq ft required on ground floor
- Prominent High Street corner locations or standalone units on prime retail parks
- High ceilings and fully glazed shop fronts
- Roadside or free standing sites of 0.5 acres where drive thru banking facilities can be incorporated
- Drive Bank will agree 25 year leases, buy freeholds or lease land and develop buildings

Please send details of any opportunities that you think will make a great Metro Bank Store to any of the following:



Metro Bank PLC is registered in England and Wales, company number 6419579. Registered office: One Southampton Row, London WC1B 6AA. We're authorized by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. 'Metrobank' is the registered trade mark of Metro Bank PLC.



Appendix 4: Metro Bank's 3rd Quarter 2015 Press Release

Metro Bank reports record third quarter growth

- Total deposits reach £4,387 million; a record quarterly increase of 16% and 87% year-on-year
- Total loans grew to £2,999 million; a record quarterly increase of 36% and 116% year-on-year
- Customer accounts surpass 601,000; a record quarterly increase of 57,000

Metro Bank today reports its third quarter trading figures to 30 September 2015 – showing record quarterly growth in deposits, lending and customer acquisition.

Craig Donaldson, Chief Executive Officer, Metro Bank commented: "During the last quarter we've seen accelerated growth on a number of fronts, including lending, deposits and customer acquisition as more customers join the banking revolution. Lending was particularly strong – reaching a record quarterly increase of 36% and 116% year-on-year as we continue to support personal and business customers."

Vernon Hill, Founder and Chairman, Metro Bank commented: "As we enter our sixth year, I'm delighted that we're continuing to grow at an ever impressive rate. UK banking customers have long been crying out for a better service and we're here to provide it. We truly value our customers and they know that, and it's why we've opened a record number of accounts during the last quarter. In turn, their support has enabled us to take the revolution wider – achieving record growth in the last three months."

Highlights for the third quarter ended 30 September 2015:

- Total assets grew to £5,433 million in the third quarter, up from £4,567 million at end second quarter; a quarterly increase of 19% and 70% year on year
- Total deposits grew to £4,387 million – a record quarterly increase of £596 million (16%) from £3,791 million as at 30 June 2015, representing year-on-year growth of 87%
- Deposits from commercial customers accounted for 68% of total deposits as of 30 September 2015, remaining stable from 67% as of June 2015
- Net deposit growth per store per month grew to £5.5 million during Q3 2015 – up from £4.8 million in Q3 2014
- Comparative store deposit growth (a measure of deposit growth using deposit numbers from stores that have been operating for more than a full year) is 77%
- Total gross loans climbed to £2,999 million – a record quarterly increase of £798 million (36%) from £2,201 million as at 30 June 2015, representing year-on-year growth of 116%.
Growth included the purchase of a £344m residential mortgage loan book. Growth without this purchase would be 21% in the quarter and 91% year on year
- Supporting small business remains a key priority for Metro Bank. Of total loans as at 30 September 2015, those to commercial customers represent more than a third (36%)
- Customer acquisition remains very strong, increasing by a quarterly record of 57,000 accounts, helping the total number of personal and business customer accounts to surpass 601,000. This represents a quarterly increase of 10% and a year-on-year increase of 51%

Appendix 5: Press Coverage

MailOnline

Chancellor George Osborne hails Metro Bank's plans to create another 3300 jobs by end of 2020 8th April 2015

Chancellor George Osborne has hailed Metro Bank's plans to create another 3300 jobs by the end of 2020

The London and South-East-focused lender said it has created 1700 jobs since it launched in 2010, with 500 of those roles created last year.

It plans to hire another 500 staff this year, having already opened branches in Cambridge and Southend.

Others in the pipeline include Tunbridge Wells, Harrow, Aylesbury, and King's Road in Chelsea. Osborne said: 'It is great to see Metro Bank expanding, not just opening new stores, but also creating 3300 new jobs up and down the country.' The Government is keen for smaller lenders to provide more competition for the High Street giants.

Upstarts Aldermore and Shawbrook floated on the stock market in recent weeks and Metro Bank – which is owned by private investors – hopes to follow suit next year.

The lender, which has 34 branches across London and the South-East – including in High Wycombe – announced its deposits grew 118 per cent to £2.9bn last year.

Its key selling points include branches which are open seven days a week, 362 days of the year.



Expanding: Vernon Hill, founder of Metro Bank

The
Economist

The progress of Metro Bank, The branch bites back 27th September 2014

"I WANT a 'wow' factor as you walk in," explains the head of Metro Bank, Vernon Hill, standing in the lobby of his flagship Holborn branch in central London. High ceilings, the American explains, are essential. He often knocks out the first floor of a building he takes over to create a roomier entrance hall—giving the branch more the feel of a shop than a bank. Indeed, in Metro Bank-speak, branches have been rebranded as "stores", just as customers have become "fans", so excited are they supposed to be. In this, as in so much else, Metro Bank, set up only four years ago, has declared war on traditional British high-street banks, which, Mr Hill claims, "overcharge, underserve and underinvest". For the moment, at least, Metro Bank is doing rather well out of its insurrection.



Opening new bank branches—sorry, stores—is subversive enough. Large banks such as Lloyds, RBS, Barclays, HSBC and Santander have been closing branches as fast as they dare, hoping to cut overheads by nudging customers online. Metro Bank has been opening them almost as quickly. It now has 27, confined to London and southern England. Eventually it hopes to open about 200. Metro Bank branches also offer a variety of services (in the loosest sense of the word) which ordinary bank branches do not bother with, such as safety-deposit boxes. The bins are free, rather than wired to the counters, and fans are allowed to bring their dogs. Mr Hill's own pooch, Duffy, gets star billing on the company's advertising posters. Metro Bank stores are also open every day of the week, and for unusually long hours.



In doing all this Mr Hill is applying the insights that he gained from fast-food retailing in America. He says he learned most, such as where to site the branches, from Ray Kroc, the founder of McDonald's. He enjoyed huge success using this model in America with Commerce Bank, which he sold in 2007, and is now trying to repeat the trick in London. Thus Mr Hill selects all the Metro Bank sites personally (they have to be on street corners) and recently opened the first "drive-thru store" in Slough, just west of London.

Joseph Dickerson, an analyst at Jefferies, an investment bank, says that Metro Bank offers a radical alternative to traditional banks and to the other so-called "challenger

banks" that have been set up in recent years, often online. The big banks "focus on marketing their products to customers and compete almost solely on price," says Mr Dickerson, while Metro Bank puts its emphasis on customer relationships, competing on service and convenience. Metro Bank, therefore, is almost disdainful of using competitive interest rates to lure fans. It is betting that most people want a return to old-fashioned, face-to-face banking, and are willing to pay for it.

Some in the banking industry are sceptical about this. Overall, for instance, people are visiting branches far less often than they used to: the number of transactions processed in branches is falling by about 10% a year in America. But Metro Bank is making it work so

far. It now has 400,000 customer accounts. In the year to the end of June deposits climbed to almost £2 billion, representing an annual growth of 125%. This, however, is still a tiny share of the market; overall, the challengers' share is no more than 2% of the lending and deposit markets.

Crucially, Metro Bank has also yet to turn a profit. Spending so much on opening so many stores means it is still losing money, though Mr Hill now expects to break even next year. Perhaps he will. People will also be watching to see whether he can really shake up the High Street banks as he has threatened. For now, at least, the branches of the big banks around the Holborn Metro Bank don't seem to be opening any later or earlier than they were before the upstart came along. That could be a sign of confidence, or complacency.

the guardian

Metro Bank's growth confirms its status as top challenger bank

21st January 2015

Nearly half a million people have opened accounts at Metro Bank, as the biggest of the "challenger" banks revealed 10 new branch openings – but said it has yet to turn a profit.

During 2014 Metro Bank saw its deposits soar from £1.3bn to £2.9bn, with lending growing to £1.6bn from £754m.

Customer accounts increased to 447,000, a year-on-year growth of 63%. But the bank continued to make losses, notching up a deficit of £8.9m in the fourth quarter of 2014, which it attributed to spending on staff, infrastructure and technology.

It said it was the sixth consecutive quarter of declining losses, and compares to a loss of £9.4m after tax in the third quarter.

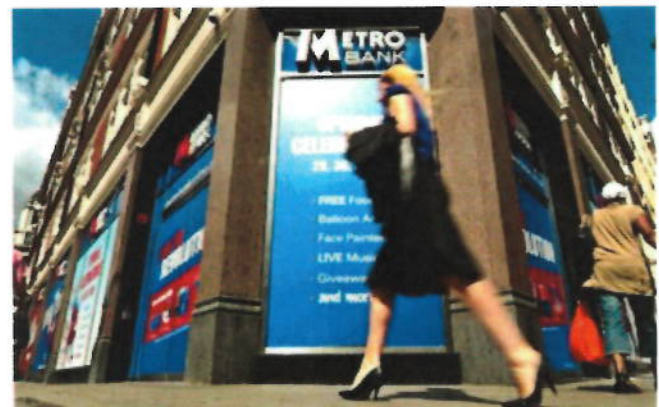
Since its [launch in Holborn](#), central London in 2010, Metro has opened 31 more branches across the capital and south-east. It said another 10 will open in 2015, including in Brighton, Cambridge, Southend and Harrow. Its workforce has expanded to just above 1,500, with 500 new jobs created during the year.

Its growth comes despite the fact that the bank says it is more interested in service than in appearing in best buy tables for savings or mortgages. About its best offering at the moment is a two-year fixed-rate cash Isa paying 1.8%, which creeps into Moneyfacts best buy deals behind the Post Office's 1.95% rate.

Metro says its approach is to offer the same deals to existing customers rather than chase after new customers with teaser rates.

Much of its growth in deposits has come from business customers. At the end of the fourth quarter, deposits from business customers were 64% of total deposits, and lending to businesses made up 45% of total lending.

Craig Donaldson, chief executive of Metro Bank, said: "2014 was another great year for Metro Bank. Throughout the year we saw substantial growth in deposits and lending, and the number of personal and business customers joining the banking revolution has continued to increase. As we start a new year, we're excited to continue innovating and providing a real banking choice to the British people, as well as maintaining our commitment to deliver the best in service and convenience."



Metro Bank has grown rapidly since it launch in 2010. Photograph: Ben

the **guardian**

Metro Bank loans and deposits surge 23rd October 2014

Metro Bank, one of the **new crop of lenders taking on the high street giants**, said loans, deposits and customer numbers have risen strongly.

In the three months to the end of September, Metro's total loans were £1.39bn – up from £1.16bn at the start of the quarter and more than double the figure a year earlier. Deposits rose by £350m during the quarter to £2.34bn and also more than doubled from a year earlier. Deposits from business customers were 60% of the total.

Customer accounts rose by 71% from a year ago to 406,000. However, after four years of trading, the venture continued to lose money, recording a loss of £9.4m. It said the loss, down from £9.9m the previous quarter, reflected spending on new branches, technology and employees.

Metro was one of the first banks to announce it would take on the established lenders, whose reputations were damaged in the financial crisis and a string of mis-selling scandals. It launched in London and offered convenient opening hours as well as water bowls and biscuits for dogs. It now has 27 'stores' in and around London.

Craig Donaldson, Metro's chief executive, said: "We're extremely proud of another quarter of strong growth in lending, deposits and customer numbers. As we enter the final quarter of 2014, we thank our personal and business customers for their ongoing support, and we look forward to bringing our customer focused proposition to more communities across London and the south-east."

Metro has been joined by Virgin Money, Tesco Bank and TSB, an offshoot of Lloyds Banking Group, in trying to win business from Lloyds, Royal Bank of Scotland, Barclays and HSBC. The so-called challenger banks are offering a varied mix of convenience, cheap deals and more straightforward products to try to lure customers. Other banks trying to take on the big four include Aldermore, which caters for small businesses, and Sweden's Handelsbanken, which has grown by word of mouth.



Metro Bank has reported strong growth in deposits and accounts. Photograph: Dan Khumud/Betty Images.

Appendix 6: Social Media Coverage

- Heena R Modi** (@heena_r_modi) 2h
Great service from Indi in #Harrow
Love the fact that Metro print ATM cards in store! 🙌
- daniel hems** (@danielhems) 7h
@Metro_Bank Fulham Broadway awesome customer service from metro man Abdul
- Dr Pooky Knightsmith** (@Pooky1) 1d 2h
Impressed by @Metro_Bank - <20 mins I had a current account, a card, mobile access & goodies for my kosi! Thanks George in Croydon
- Very Good Service** (@verygoodservice) Nov 26
@Metro_Bank with Abdul in your #fulham Broadway branch. Very happy with the service so far 10/10
- Mark Hazelby** (@markhazelby) Nov 26
Great service @Metro_Bank Elington (thanks Will) no appt needed open account, get cheque book & cards same day! #BankingRevolution
- SoSayMe** (@SoSayMeTweets) Nov 26
@Metro_Bank think you guys are brilliant, we love coming into the branch. Such a great atmosphere and staff so nice. Well done!!
- BaldieLocks** (@BaldieLocks) Nov 26
@MetroBank_Help just spoken to Luke on the phone from your customer service team and he was very helpful 🙌🙌🙌🙌🙌🙌
- SoSayMe** (@SoSayMeTweets) 1h
@Metro_Bank think you guys are brilliant, we love coming into the branch. Such a great atmosphere and staff so nice. Well done!!
- Charles C** (@charlie_c) 2h
@Metro_Bank Heard your CFO Craig D speak today at @RussamGMS What an advocate for all you do, sounds a great bank to be a customer of
- Mark Jones** (@AppleChartAcc) Nov 26
Shown around new Newbury store of Metro Bank today Very impressive banking model. Thank you Phil Cople @Metro_Bank pic.twitter.com/mkKDtoVY3s
- Bruce McKee** (@bruce_mckee) Nov 26
15m 32sec from walking into @Metro_Bank to walking out with working debit card is that a #WorldRecord? Great #customerexperience
- Aardvark Forensics** (@aardvark_uk) Nov 26
Exhausted after a busy day meeting new friends at @Metro_Bank
- Leah Poser** (@LeahPoser) 2h
Thank you @Metro_Bank, being able to go into a branch & instantly get a new card makes losing mine much less stressful
- Dr Pooky Knightsmith** (@Pooky1) 1d 2h
@Metro_Bank thanks! You have a great and very loyal employee in George. You're clearly doing something very right!
- Nigel Fenwick** (@NigelFenwick) 1d 1h
Love the @metro_bank focus on creating fans not customers through stores open 7 days a week and nights. Use #digital to change CX #conv15
- Francois** (@francois_d) Nov 26
Have to say @Metro_Bank is easily the best bank I've ever been with! EVERYTHING is so simple and easy makes life a lot easier!
- Sophie Parr** (@sophieparr) Nov 26
I do love @Metro_Bank - call them at 6pm Friday to cancel my bank card and new card printed in store Saturday afternoon! Now Xmas shopping!
- Samuel Dillon** (@SamuelDillon) Nov 26
@MetroBank_Help cant help myself, called at midnight last night and someone answered straightaway #FutureOfBanking
- Julian Zammit** (@Zammit7) 7h
@Metro_Bank smashing customer experience out of the park as usual. Fraud detected 12:02 new card and refund in play by 13:08 #cox #winners
- Chris Rose** (@anyrose) Nov 22
Morty the beagle loves his new @MetroBank_Help bandana he picked up in #Newbury this week!
- Nigel Walsh** (@nigelwalsh) Nov 22
Great customer experience today @MetroBank_Help - thanks to Waqas in Borehamwood
- Julie Frank** (@Julie_Frank123) Nov 24
Alarmed from @Metro_Bank Tottenham Court Rd was fantastic last week. I'll definitely be switching soon and recommend others too!
- The Body Coach** (@thebodycoach) Nov 22
I was invited to the @Metro_Bank 'visions' day today. Such an awesome company culture! #FansNotCustomers
- Julia Groves** (@juliagroves) Nov 23
Just got a new mastercard from @MetroBank_Help in less than 5 mins. printed at the branch. Lush.
- Jade** (@Jade1094269) Nov 23
So glad I joined the #bankingrevolution @Metro_Bank
Lost my card and am getting Supra speedy service from the St Albans branch.



Johnny Dunford @JohnnyDunford · 2h
@Metro_Bank just opened my first account at metro bank with merville greet I



1 retweet 1 heart 1 reply



James Giles @jagles3 · 23h
@Metro_Bank Great bank and the super helpful team at Fulham Broadway are stars, thank you all once again #lovelybank

1 retweet 1 heart 1 reply



Frances Robinson @FRBroun · Nov 11
So impressed w @Metro_Bank - lost my card, picked up new one the next day! Fast, friendly just so different to dealing with banks usually

4 retweets 3 hearts 1 reply



Ian Gibben @MabulMandA · Nov 8
Your @BDCH fee for a dog will be met by @Metro_Bank if you open an account with them! Great idea! #BatterseaDogsHome #Banking #Pets

2 retweets 1 heart 1 reply



RAJU R @rajuraj · Nov 11
@MetroBank_Help Wasas is a star! Helped me opened my account and was done really quickly :)

1 retweet 2 hearts 1 reply



Guy Rolfe @guyrolfe · 51m
@Metro_Bank @RichardBenyonMP I cannot sing high enough praise for metro bank. Newbury is certainly very lucky to have one open!!!!

1 retweet 1 heart 1 reply View conversation



Road Casting @tropicalrains · 4h
@Metro_Bank I like you so much I have 4 accounts 😊

1 retweet 1 heart 1 reply View conversation



Nigel Davy @NME_Janed · Nov 10
These people should bank with @Metro_Bank They've been open 90 mins already



5 retweets 5 hearts 1 reply



DannoMK @DannoMK · Nov 19
YAY 🙌 my switch to @Metro_Bank is complete. Good bye RBS! hello #BankingRevolution #MiltonKeynes

3 retweets 5 hearts 1 reply



Matthew Woods @MatthewWoods · Nov 15
Card eaten by machine last night, went to @Metro_Bank today & got new one within 10 mins. Which other bank does that at 6pm on a Sunday?

1 retweet 1 heart 1 reply



Martin Reilly @MartinReilly · 21h
@Metro_Bank huge thanks to your fraud team for spotting issues on my account. Amazing work and superb service

1 retweet 1 heart 1 reply



Sean Marshall @Yoshua · Nov 11
@Metro_Bank Jamie Gough and Parisa Matsuno Best meet & greet anywhere I have ever been. Signed up for an account and enjoyed myself! O O

1 retweet 2 hearts 1 reply



Cazza 5's @Cazza5s · Nov 11
@loosewomen re service at banks. @Metro_Bank greet u as u walk in, sit u down, make u a drink etc. How it used to be. Never stressful there

1 retweet 1 heart 1 reply



Aardvark Forensics @Aardvarkuk · Nov 10
Just bumped into the friendly team getting the Newbury @Metro_Bank ready for its opening on 20 Nov

1 retweet 1 heart 1 reply



Jack Billington @jackb1996 · Nov 9
Fantastic friendly customer service today from Imen over the phone with @Metro_Bank this afternoon!

1 retweet 2 hearts 1 reply



Syed Rumman @SyedRumman · Nov 6
@Metro_Bank great service by @Rezaul and @May from Cheapside branch. Thanks guys, you are two shining stars!

1 retweet 1 heart 1 reply



Jon Maunder @JonMaunder · 4h
Other banks are asleep while @Metro_Bank in Newbury are partying on the high street at 8am

1 retweet 1 heart 1 reply



Jonathan Fox @FlyingFort · 10h
@BigBridge_Media @SussexHourUK Banks have known about Xero for several years, some are realising too late. @Metro_Bank is forward thinking

1 retweet 1 heart 1 reply View conversation



Kevin Smith @ker-smith33 · Nov 10
@Metro_Bank All sorted thanks to @Metro_Bank great service! Opened an account instantly in store. Card printed and ready to use same DAY!

1 retweet 1 heart 1 reply



Vicky Phipps @vicky02 · Nov 17
@Metro_Bank went to a meeting at your Holborn branch today. Came away with a great boost. Thanks!!

1 retweet 1 heart 1 reply



YOUR BUILD PLAN @yourbuildplan · Nov 17
Highly recommend @MetroBank for all your #Banking needs

1 retweet 1 heart 1 reply



James Max @jagmaxmax · Nov 17
One very tired Barnaby! Thank you for taking the time to meet with us today @Metro_Bank Barnaby enjoyed visiting HQ!



2 retweets 2 hearts 1 reply



Appendix 7: Metro Bank's Awards

Microsoft names Metro Bank the most innovative in Europe

2nd December 2015

Metro Bank is proud to have won the Financial Services Award at Microsoft's Visionary Awards for Outstanding Business Achievement. The award recognises the most innovative financial services organisation in the EMEA region that is using cutting-edge technology to better serve its customers.

Wayne Morris, Corporate Vice President of Marketing for Microsoft Business Solutions commented: "Metro Bank has won the award as they are the perfect showcase of how business and technology teams can work together to deliver a truly amazing experience for customers and internal colleagues. The team constantly look at the very latest Microsoft technology to meet new business requirements and quickly look to provide a highly productive and engaging experience to manage customer facing interactions. They now have a complete single view of the customer and are constantly innovating and utilising our technology at the very core to achieve it. Truly exciting and a team that epitomise best practice!"

Craig Donaldson, Chief Executive, Metro Bank commented: "We are proud to have been recognised by Microsoft as the most innovative financial services firm in Europe, the Middle East and Africa. Whilst incumbent banks have continued to use outdated IT, we have been working with Microsoft to build entirely new systems dedicated to delivering outstanding customer service. It's another example of how Metro Bank is revolutionising banking by putting our customers at the centre of everything we do."

The 2015 EMEA Visionary Awards, which are presented in ten categories, recognise and celebrate Microsoft customers that have achieved notable accomplishments using their Microsoft solutions.

Metro Bank sweeps up at Moneywise Customer Service Awards 2015

12th June 2015

Metro Bank, the revolutionary high street bank, was last night presented with three awards at the Moneywise Customer Service Awards 2015, including Most Trusted Challenger Bank, Best Current Account for Branch Service, and Most Trusted Current Account Provider. The leading challenger bank was also highly commended in the category for Best Current Account for Call Centre Service.

The bank, which prides itself on offering customers the very best in service and convenience, beat off competition from banks, building societies and retailers.

Craig Donaldson, Chief Executive at Metro Bank said: "The awards are testament to the strength of our model and the dedication and enthusiasm of our colleagues. Our thanks, as always, goes out to our customers who continue to show their support as we revolutionise UK banking."

Metro Bank continues its rapid expansion in 2015 most recently opening its 35th store in Tunbridge Wells, with the Harrow store set to open next on Friday 19th June. It now has more than 500,000 personal and business customer accounts and recently announced strong quarter one results which saw growth across lending and deposits, with year on year increases of 91% and 109% respectively.

Metro Bank wins award for innovative store strategy

22nd May 2015

Metro Bank, the revolutionary high street bank, has scooped the 'Best Branch Strategy Award' at the Retail Banker International Awards 2015.

The award recognises Metro Bank's innovative store approach and commitment to providing its customers with unparalleled levels of service and convenience. Metro Bank offers customer-focussed banking, with stores open at the convenience of local residents and businesses - early to late, seven days a week, 362 days a year. Stores also benefit from traditional face-to-face service, with no need for customers to book an appointment and instant account opening.

Chris Brindley, Managing Director Retail Banking at Metro Bank commented: "It's a true honour to have been recognised by Retail Banker International for our store strategy. Our stores enable us to provide traditional banking services and build personal relationships with local residents, businesses and communities. We pride ourselves on offering our customers unparalleled levels of service and convenience, and we value the relationships that our stores enable us to create. I would like to take this opportunity to thank our customers who continue to show their support as we revolutionise UK banking."

The leading challenger bank continues its rapid expansion in 2015, most recently opening its 35th store in Tunbridge Wells, with six more stores set to open later this year.

A blue graphic with white and yellow text announcing Metro Bank's success. It includes two photographs of award winners. The top photo shows a group of people on a stage with a 'UK DIGITAL EXPERIENCE AWARDS 2015' backdrop. The bottom photo shows a group of Metro Bank staff members smiling and holding their award.

Metro Bank
is *Winning!*

We are very proud to announce that our **AMAZE(ING) Metro Bank University** Team won two **FANTastic** awards at the 2015 UK Digital Experience Awards. Colleagues attended a glittering gala dinner at the Park Plaza, Riverbank, where they scooped the award for Financial Customer Service Training Programme of the Year and the Best Customer Service Training Programme Overall. This is a massive achievement for Metro Bank - we're on a mission to create **FANS** and this would not be possible without the **AMAZE(ING)** training our colleagues receive!

Appendix 8: Metro Bank: FANS Not Customers

LOVE YOUR BANK at LAST



EDITOR'S LETTER

A first time for everything



"We do not do book reviews" in Retail Banker International was one of the first house rules I recall hearing from the then editor when I first joined VRL, more years ago now than I care to remember.

And that is not a rule I have seen fit to break in the time I have worked upon the title.

I am happy to make an exception in the case of 'Fans Not Customers: How to Create Growth Companies in a No Growth World' by Vernon Hill.

If you do not know something of Vernon's track record then you must simply read the book: you are in for a treat.

The scary thing is that the vast majority of retail bankers will know much about Vernon's track record; they simply choose to ignore many of the lessons that can be gleaned from his no-nonsense common sense approach to banking.

Those readers fully apprised of the phenomenal success story that is Vernon Hill can skip the next couple of paragraphs.

He launched Commerce Bancorp in the US with one branch, nine staff and \$1.5m in capital in 1973. Fast forward 34 years and Commerce was sold to Canada's Toronto-Dominion for \$8.5bn.

Then in 2010, Hill co-founded Metro Bank in the UK, the first new high-street bank to be granted to set up shop in over 150 years.

Hill's innovations at Commerce – he talked of reinventing retail banking – included evening and weekend store opening, free coin-counting machines and a fervent focus on service excellence all wrapped up in a phrase he invented: Power Banking.

Commerce amazed and delighted its customers as Hill sought to turn its customers into fans.

Easy said – devilishly difficult to achieve. He also held an unswerving belief in the importance of the store: by the time TD snapped up Commerce, the branch network had grown to 470 stores (not, definitely not, branches).

Hill talked of turning banking from drudgery into fun – and shareholders shared in the fun.

In the 20-year period prior to the TD deal, they earned an average annual return of 23% percent, in a stock market that returned less than half that over the same period.

Hill's book is littered with examples of what makes a great bank work.

He argues that marketing is everything with a never-ending goal to surprise and delight its customers/fans.

Many banks around the world have opened a handful of flagship branches or stores, in large part modeled on Apple's iconic outlets.

At Commerce (and recently in the UK with Metro Bank) Hill believes that every store should be regarded as the public face of the bank.

So Hill chooses the best possible locations for his retail stores and always situated in the highest trafficked locations available. He argues that the best site is almost always worth the cost per square foot.

Once a location is selected, Hill does not skimp on the lavishness of the opening: he talks of putting the 'grand' into grand openings.

Once up and running, Commerce (and now Metro Bank's) strategy is to focus on gathering low-cost deposits. Add to that a fervent belief in adding customer value, no stupid bank rules and a revenue driven (not cost driven) growth model.

He argues that there are some simple keys to financial execution: believe in your model; over-invest in facilities and people and demand 100% execution.

He flags up the need to focus on small things like pens. Metro Bank gives away a lot of pens; calls to Metro Bank's call centre are answered by a real person and on the second ring.

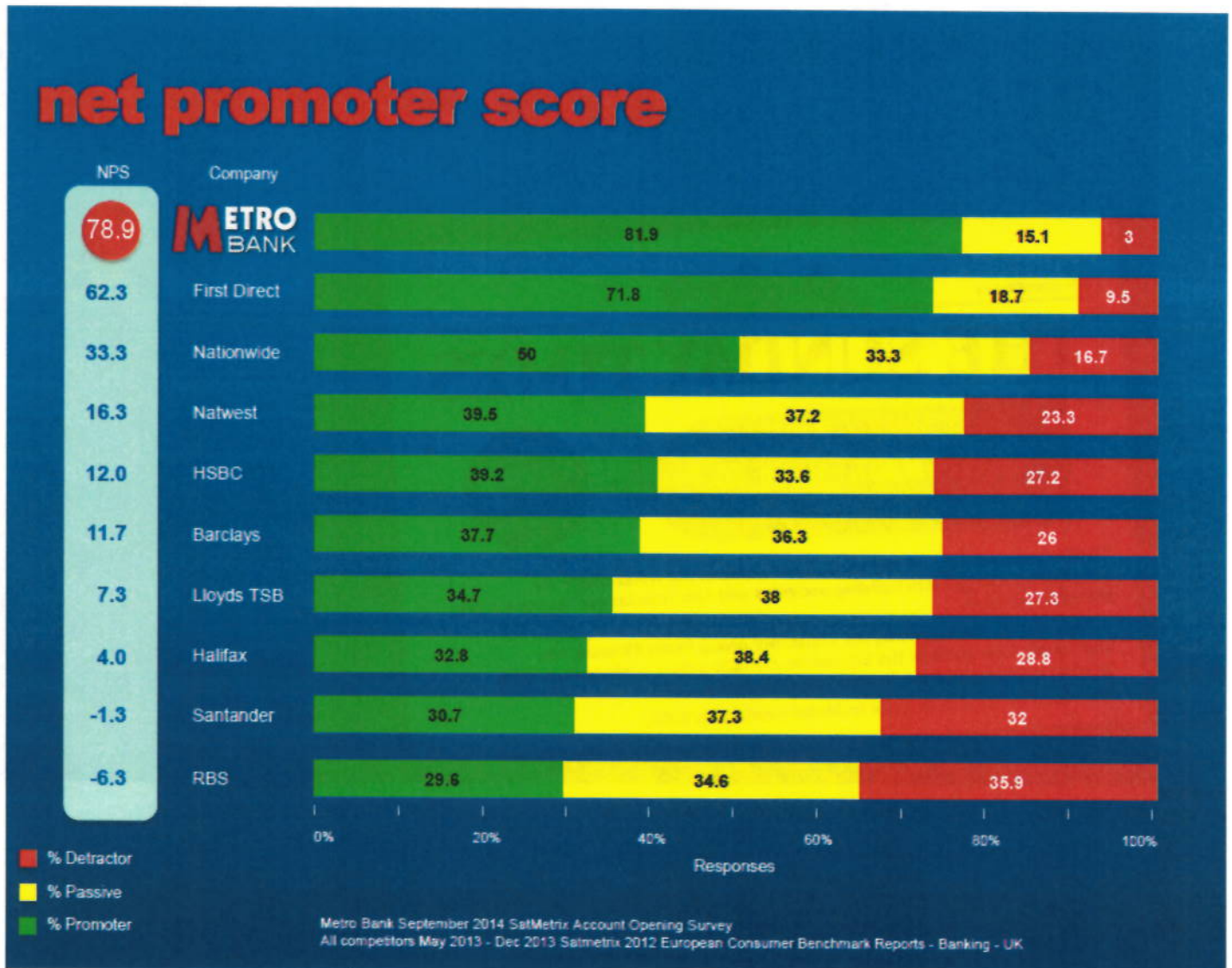
Above all, it is a generous book, acknowledging the degree of support Hill has enjoyed from colleagues and family, in particular his wife Shirley – the brains behind store design and evangelist in chief of the strategy of design as a competitive weapon.

As the Metro Bank store network grows towards its target of 200 units by 2020, Hill's fan-base will continue to accelerate. It will be wholly deserved. He remains one of the genuinely few retail banking stars of the past 30 years and I remain one of his biggest fans.

Douglas Blakey

douglas.blakey@vrlfinancialnews.com

Appendix 9: Metro Bank – FANTastic Customer Service





metro bank voted no.1 in customer service

2 NOVEMBER 2014



THE SUNDAY TIMES

MONEY MADE EASY
YOUR FIVE-MINUTE GUIDE TO...
BANK CUSTOMER SERVICE



"THE established high street banks have some of the worst customer satisfaction ratings, with building societies and new "challenger" banks topping the tables instead.

"A new survey, conducted by the consumer group Fairer Finance, has highlighted how some of the big names are failing their customers, driving growing numbers of them to vote with their feet.

"The top overall score went to Metro bank with 93%."

METRO BANK

93%

First Direct	83%
Halifax	63%
TSB	54%
Lloyds Bank	35%
Barclays	30%
Santander	25%
Royal Bank of Scotland	6%

join the
revolution



METRO
BANK

FANS!

not customers

Metro Bank is the revolution in British banking.

Britain's first new High Street bank in over 100 years offers banking focused on you, the customer. Metro Bank provides customers with unparalleled levels of service and convenience, delivering the best of every channel.

- in-store
- online
- mobile
- phone

We're a unique, customer-focused, retail business which reinvents the rules of retail banking by killing all stupid bank rules.

- Great companies create great brands – emotional brands – where the customer becomes a FAN.
- Great brands create value for their shareholders by creating value for their customers.
- Great brands are created with a combination of:
 - Models differentiated and value added
 - Culture reinforcing and pervasive
 - Fanatical execution

"OUR JOB IS TO
CREATE FANS, NOT
CUSTOMERS.
THIS IS THE BANKING
REVOLUTION."



Photo from left to right:
Craig Donaldson, CEO
Vernon W. Hill II,
Chairman & Founder



Dear Friends & Fans,

Metro Bank began the British Banking Revolution in July 2010 – a reinvention of community banking with a focus on convenience and service – in order to create FANS, not customers. Finally a bank you can LOVE AT LAST.

With over 35 stores now open, we aim to serve every community in Greater London with 150+ stores. If we are not in your area – we will be soon!


Our model is unparalleled convenience and service, no product sales, 7 day-a-week branch banking, 24/7 local call centres with real people answering real questions. Our goal is to eliminate every stupid bank rule.

As a retail and business bank, your local banker is in every community, serving the consumer and business requirements while supporting the civic efforts of your community. **Local Bankers Serving Local Communities.**

Our Private Banking is dedicated to the unique needs of Private Banking customers, providing service, not product sales.

Britain has embraced the Metro Bank launch. Our thanks to our FANS. We invite you to Join the Revolution and visit one of our stores today.

Very truly yours,


Vernon W. Hill II
Chairman & Founder


Craig Donaldson
CEO



local banking is back

We continue our rapid expansion with the aim of having 150+ stores by 2020. We're always looking out for great new locations and communities across London to be part of. If we are not in your area...we will be soon!

Metro Bank delivers its unique experience through a local management structure led by highly talented Regional Directors who are responsible for all the consumer, commercial and Private Banking in each of our geographic areas.

M Open 7 Days
M Coming Soon



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James Baughan
Regional Director, West Region
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Kevin Walker
Regional Director, South Region
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07432 732555



the best of every channel you choose

Metro Bank customers are empowered to bank whenever and wherever they choose, in our convenient stores 7 days a week, by internet, by mobile or by telephone – 24/7. With our cutting-edge store design and no appointment necessary to see your personal banker, you really can "Love Your Bank at Last."



in-store

Stores are open 7 days a week, 362 days a year. We are only closed on New Year's Day, Easter Sunday and Christmas Day.



online

Whether you're on the move or sitting on your sofa, our Internet Banking helps you stay in control of your finances online.



mobile

Our Personal Banking App is easy to use and allows you to manage your accounts securely on the go. You can even temporarily block & unblock your card.



phone

Talk to a real person in our local UK call centre. It's simple and there are no automated menus to navigate – call 0345 08 08 500 any time, any day.



executive directors



Craig Donaldson
Chief Executive Officer



Mike Brierley
Chief Financial Officer



Aisling Kane
Chief Operating Officer



Iain Kirkpatrick
Managing Director,
Regional Banking



Ian Walters
Managing Director,
Commercial Banking



Aileen Gillen
Chief Risk Officer



Paul Blackburn
Chief Compliance Officer



Danielle Hammer
Chief People Officer



David Young
Director of Change
and Innovation

non-executive directors



Vernon W. Hill, II
Chairman, Founder



Stuart Bennis
Former Group Retail
Director, Nationwide



Keith Carby
CEO of the Central
Capital Group Ltd,
Chairman of Polar
Dairies PLC



Roger Farah
Co-CEO of TSB Bank
Former Executive
Vice Chairman,
Ralph Lauren
Corporation



Lord Howard Flight
Commissioner,
Gateway Finance
Services Commission
Director, Investec
Asset Management



Ben Gunn
Former CEO
& Chairman,
Friends Provident
Life Holdings



Gene Lockhart
Former CEO,
Midland Bank
Senior Advisor, Genesys
Advent Partners
Former CEO, Mastercard



business banking

"the entrepreneur's bank"

We are your convenient, entrepreneurial and local business bank. Whether you're starting a new business or joining us as a commercial customer, we offer a fresh perspective on business banking. Our experienced local bankers are in every store providing the support you need to help you succeed.

From business current accounts, overdrafts, card payment solutions and cash management services to expansion funding and commercial lending, we are here to help you every step of the way.

You'll get the direct contact details of your local business manager who has the expertise and quick answers you really need. We take care of your bank account so you can focus on doing what you do best – running your business.

- Bank accounts opened in-store*
- Stores open 7 days, early & late
- Debit cards & cheque books printed in-store*
- Immediate online setup & registration*
- 24/7 local call centres
- Dedicated switching team
- Faster payments, BACS, CHAPS & international payments
- Bulk cash & coin on request*
- Safe deposit boxes

* Metro Bank products are subject to status and approval. Terms and conditions apply.

Photo from left to right:

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**ONE DEDICATED BANKER.
ONE SPECIALIST SUPPORT TEAM.
ONE REVOLUTIONARY BANK.**



partnership banking

Partnership Banking combines unparalleled levels of service and convenience with a deep understanding of the needs of financial advisers in the UK. Unlike many other banks we do not sell investments or provide investment advice. Our focus on service and delivery, backed by industry-leading technology, ensures we are able to meet the diverse needs of financial advisers and other intermediaries across the UK. We offer a wide range of deposit and lending needs:

- SIPP & SSAS Pension deposits – instant access savings accounts and a range of fixed term savings accounts
- Client deposit services – general client accounts, designated accounts and fixed term accounts
- Specialist SIPP & SSAS lending products
- Client portfolio lending solutions – our market leading Money Management Account offering a flexible current account with an integrated overdraft, secured against eligible portfolio investments.



Robert Dunn
Partnership Director
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07908 027008

METRO BANK PRIVATE BANKING

private by name, personal by nature

Metro Bank Private Banking provides a highly personal and flexible banking service to high net worth individuals and families across the country.

We always:

- Give you a highly experienced dedicated Private Banker
- Bespoke both your Private Banking and Commercial Banking needs within one team
- Support you with a team experienced in working with entrepreneurs, senior executives and those from the sports and entertainment industry

We never:

- Provide wealth management
- Sell investments
- Give advice on either

This leaves you free to manage your wealth while we concentrate on what we do best – Banking.

Julie Denney
Head of Private Banking
julie.denney@metrobank.co.uk
07967 067000



personal banking

We offer unparalleled levels of service and convenience. Pop into your local store and join the revolution – there's no appointment necessary and your account will be set-up instantly.* We print your debit card in-store and you choose your PIN. Our Current Account Switch Service takes the hassle out of changing banks.

- Open 7 days, early & late
- Instant account opening** – no appointment necessary
- Instant card & cheque book – printed in-store
- Dedicated switching team
- Free card transactions in Europe††
- Free coin counting
- 24/7 local call centres – real people with real answers
- Safe deposit boxes – 7 day access
- Personal & mortgage lending
- £, \$ and € accounts
- Our best available savings rate, ALWAYS
- In-store, online, mobile & phone banking



Local Call Centre



Safe Deposit Boxes



Free Coin Counting

switching your account to Metro Bank

**CURRENT ACCOUNT
SWITCH
GUARANTEE**

In just 7 days (excludes weekends and bank holidays), we'll cash any payments made to your old account for 30 months and we'll even match your existing overdraft.* This free service is protected by the Current Account Switch Guarantee – ask for details.

* Account opening conditions apply. All Metro Bank products are subject to credit and approval.
** Cash card must be activated.

John Kempster
Managing Director, Regional Banking
john.kempster@metrobank.co.uk
07792 711886



your local bank

We are your community bank and we love to support local causes and groups. Last year we held over 2,000 community and in-store events like – local fairs, parades, school events, free pumpkin decorating at Halloween, free craft events at Easter and Christmas and Christmas activities to name a few.



Free Pumpkin Decorating



We value our younger customers and believe that banking should be fun. We prize using our Magic Money Machine, enjoy free lollipops, save your coins in our M-Banks and much more... there are so many reasons to visit!

Our Magic Money 5 for 5 Club introduces kids to the banking process and encourages them to save money on a monthly basis with the help of our fun, interactive Magic Money Machines.



The Metro Bank Money Zone programme works with schools in the community to give children an understanding of the basic principles of money, saving and banking in an engaging and fun way. The programme meets the requirements of the national curriculum for mathematics, and aims to help them become more financially confident. Last year over 14,000 children went through our programme.

We support Places2Be who provide emotional and therapeutic services in primary and secondary schools, building children's resilience through talking, creative work and play. Currently they reach 75,000 children, helping them to cope with wide-ranging and often complex social issues.



dogs rule!

at METRO BANK

We understand how important man's best friend is so we actively welcome dogs into our stores. We have a selection of dog goodies when you visit, including fresh water bowls and dog treats.

Throughout the year we hold adoption fairs and free microchipping events at many of our stores to support Battersea Dogs & Cats Home. We'll pay the microchipping fees for our customers when they adopt a dog or cat.*

* The microchipping fee (between £10-£20) will be refunded to a debit or credit card. A £10 fee will be refunded on a dog, treated with microchipping. Valid until 31 April 2015.



"SPECIAL RECOGNITION AWARD"
Official Winner of the 2011, 2012, 2013 & 2014
Kennel Club's Be Dog Friendly Awards

Microsoft
Dynamics
"TECHNOLOGY INNOVATION
ENTERPRISE AWARD"

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Cash Savings Advice
"BEST SAVINGS PROVIDER"

FAIRER
FINANCE
"BEST FOR
CUSTOMER SERVICE"

Moneywise
"BEST CURRENT ACCOUNT
FOR BRANCH SERVICE"

Moneywise
"MOST TRUSTED CURRENT
ACCOUNT PROVIDER"

Moneywise
"HIGHLY COMMENDED FOR
CALL CENTRE SERVICE"

VOICER
AWARDS
"FINANCIAL PROVIDER
OF THE YEAR"

WINNER
"BEST OVERALL
CURRENT ACCOUNT"

SPEAR'S
WINNER 2014
"WEALTH MANAGEMENT
INNOVATION OF THE YEAR"



what they're saying about us

THE SUNDAY TIMES

November 2014

"Which Bank offers the best service? ... The top score went to Metro Bank with 93%. The bank opened in 2010. The survey of more than 16,000 account holders considered factors such as fees, transparency and how complaints are dealt with as well as customer 'satisfaction'."

The Daily Telegraph

November 2014

"Customers can walk into a store and have 15 minutes later with a fully working account and debit card which has been posted to them. People who study this debit card can use Metro's App to put a temporary block on it, which can be reversed if the card hasn't been used yet."

Business Money

27th January 2015

Metro Bank - SME Finance

The executive team thinks fast on its feet and quickly realised that they could enhance the proposition with the range of additional facilities that a bank can bring to the party."

MailOnline

21st January 2015

Metro Bank lured 23,000 customers a month from rivals last year

Metro Bank continued to show its credentials as a challenger to bigger rivals after it pulled more than 230,000 customers last year. During the year it saw deposits rise from £2.5 billion to £2.2 billion while lending grew to £3.6 billion from £2.5 billion.

FINANCIAL TIMES

27th January 2015

Metro Bank doubles lending as it focuses on business clients

Dubbing itself as the "bank for entrepreneurs", the lender said in its full-year results that business customers "remain a key focus".

blue&green

September 2014

"Some 90% of small and medium sized enterprises (SME) believe that challenger banks such as Metro... offer better services than the 'big four' on the high street, according to a new survey."

London Evening Standard

2nd March 2015

Inspiration for the Nation, LSE picks Metro Bank as one of the Fastest Growing 1,000 Firms

the guardian

27th January 2015

Since its launch in Holford, central London in 2010, Metro has opened 31 more branches across the capital and south-east. It said another 30 will open in 2015, including Brighton, Cambridge, Oxford and Haver. Its workforce has expanded to just above 1,500, with 500 new jobs created during the year.

The Daily Telegraph

27th January 2015

Metro Bank plots further expansion after loans double

The combination of seven-day overdrafts and on the spot account opening appears to be paying off for Metro Bank, with the five-year old upstart doubling lending last year.

voted #1 for customer service



METRO BANK

93%

First Direct	83%
Hallfax	63%
TSB	54%
Lloyds Bank	35%
Barclays	30%
Santander	25%
Royal Bank of Scotland	6%

Appendix 11: Local Data Company Report

Name	Multiple name	StreetNo	Street	PostCode	Area	Status	Date Opened/Closed
2011							
Allied Irish Bank PLC	Allied Irish Bank PLC		Tenterden Street	W1S 1TD	Mayfair	Closed	24/05/2011
HSBC	HSBC	166	Vauxhall Bridge Road	SW1V 2RA	Victoria	Closed	02/06/2011
Bank Of Scotland	Bank Of Scotland	14-16	Cockspur Street	SW1Y 5BL	Charing Cross	Closed	06/06/2011
Santander	Santander	95	Victoria Street	SW1H 0HW	Westminster	Opened	07/06/2011
HSBC	HSBC	89	Buckingham Palace Road	SW1W 0QL	Victoria	Closed	08/06/2011
Halifax PLC	Halifax PLC	2	Wilton Road	SW1V 1AN		Opened	11/06/2011
HSBC	HSBC	333	Vauxhall Bridge Road	SW1V 1EJ		Opened	11/06/2011
Yorkshire Bank	Yorkshire Bank	35	Regent Street	SW1Y 4ND	London Haymarket	Opened	16/06/2011
Santander	Santander		Prince Consort Road	SW7 2AZ	South Kensington	Opened	20/06/2011
Handelsbanken	Handelsbanken	13	Charles II Street	SW1Y 4QU	London Haymarket	Opened	05/07/2011
HSBC Private Bank	HSBC	74	St. James's Street	SW1A 1PL	St. James's	Opened	15/11/2011
Bank Of Beirut	Bank of Beirut	17A	Curzon Street	W1J 5HS	Mayfair	Opened	06/12/2011
HSBC	HSBC	19	Grosvenor Place	SW1X 7HT	Knightsbridge	Closed	08/12/2011
Lloyds Bank	Lloyds Bank	22-24	Southampton Street	WC2E 7JA	Covent Garden	Closed	20/12/2011
2012							
Nationwide Building Society	Nationwide Building Society	13	Kingsgate Parade	SW1E 6SH	Westminster	Closed	18/05/2012
Santander	Santander	47-48	Piccadilly	W1J 0BL	London Haymarket	Closed	14/06/2012
The Royal Bank Of Scotland PLC	The Royal Bank of Scotland PLC	119-121	Victoria Street	SW1E 6RA	Westminster	Closed	03/07/2012
HSBC	HSBC	102-104	Brompton Road	SW3 1JJ		Opened	04/07/2012
NatWest	NatWest	19-21	Shaftesbury Avenue	W1D 7ED	London Haymarket	Closed	23/11/2012
NatWest	NatWest	2a	Charing Cross Road	WC2H 0HG	Leicester Square	Closed	30/11/2012
Santander	Santander	21	Hanover Square	W1S 1JW	Mayfair	Closed	03/12/2012
Lloyds Bank	Lloyds Bank	50	Grosvenor Street	W1K 3LF	Mayfair	Closed	06/12/2012
Virgin Money	Virgin Money	6-8	Maddox Street	W1S 1NR	Mayfair	Opened	06/12/2012
2013							
The Royal Bank of Scotland PLC	The Royal Bank of Scotland PLC	119-121	Victoria Street	SW1E 6RA	Westminster	Opened	07/01/2013
NatWest	NatWest	217	Strand	WC2R 1AT	Charing Cross	Closed	15/04/2013

Name	Multiple name	StreetNo	Street	PostCode	Area	Status	Date Opened/Closed
NatWest	NatWest	1-4	Berkeley Square	W1J 6BR	Mayfair	Closed	09/05/2013
Coutts & Co	Coutts & Co	16	Cavendish Square	W1G 9DD	Marylebone	Closed	12/05/2013
Lloyds TSB	Lloyds Bank	30-32	Westbourne Grove	W2 5RW	Paddington	Closed	29/08/2013
TSB Bank	TSB Bank	30-32	Westbourne Grove	W2 5RW	Paddington	Opened	29/08/2013
TSB Bank	TSB Bank	12	Broadway	SW1H 0BH	Westminster	Opened	29/08/2013
TSB Bank	TSB Bank	116	Chancery Lane	WC2A 1RS	Holborn	Opened	29/08/2013
TSB Bank	TSB Bank	68	Baker Street	W1U 7ER	Marylebone	Opened	29/08/2013
Habib Bank A G Zurich	Habib Bank A G Zurich	76	Edgware Road	W2 2EG	Paddington	Closed	21/11/2013
Lloyds Bank	Lloyds Bank	195	Edgware Road	W2 1EY	Paddington	Closed	21/11/2013
Raphaels Bank	Raphaels Bank	19-21	Shaftesbury Avenue	W1D 7ED	London Haymarket	Opened	22/11/2013
The Co-operative Bank PLC	The Co-operative Bank PLC	186	Queensway	W2 6LY	Paddington	Opened	26/11/2013
Lloyds Bank	Lloyds Bank	167-169	Edgware Road	W2 2HR	Paddington	Opened	10/12/2013
BMCE EuroServices	BMCE EuroServices	19	Craven Road	W2 3BP	Paddington	Opened	12/12/2013
2014							
Barclays Bank PLC Wealth	Barclays Bank PLC	41-43	Brook Street	W1K 4HJ	Mayfair	Closed	06/01/2014
The Co-operative Bank PLC	The Co-operative Bank PLC	38	Baker Street	W1U 7BY	Marylebone	Opened	16/01/2014
The Royal Bank Of Scotland PLC	The Royal Bank of Scotland PLC	60	Conduit Street	W1S 2GA	Mayfair	Closed	25/04/2014
Lloyds Bank	Lloyds Bank	32	Oxford Street	W1D 1AX	Marylebone	Closed	01/05/2014
Santander	Santander	95	Victoria Street	SW1H 0HW	Westminster	Closed	19/05/2014
The Royal Bank of Scotland PLC	The Royal Bank of Scotland PLC	60	Conduit Street	W1S 2GA	Mayfair	Opened	27/05/2014
Barclays Bank PLC	Barclays Bank PLC	8-9	Hanover Square	W1S 1HH	Mayfair	Closed	05/11/2014
HSBC	HSBC	26	Edgware Road	W2 2EH	Paddington	Closed	05/11/2014
HSBC	HSBC	19	St. George Street	W1S 1FN	Mayfair	Closed	05/11/2014
Lloyds Bank	Lloyds Bank	10	Hanover Square	W1S 1HJ	Mayfair	Closed	05/11/2014
HSBC	HSBC	19	Marylebone High Street	W1U 4BD	Mayfair	Closed	06/11/2014
NatWest	NatWest	508	Edgware Road	W2 1EN	Paddington	Closed	12/11/2014
HSBC	HSBC	4-8	Victoria Street	SW1H 0NJ	Westminster	Closed	17/11/2014
NatWest	NatWest	57	Victoria Street	SW1H 0HP	Westminster	Closed	17/11/2014
Lloyds Bank	Lloyds Bank	117	Oxford Street	W1D 2HW	Marylebone	Opened	25/11/2014

2015							
Handelsbanken	Handelsbanken	5	Welbeck Street	W1G 9YQ	Marylebone	Opened	19/02/2015
HSBC Private Bank	HSBC	74	St. James's Street	SW1A 1PL	St. James's	Closed	19/02/2015
Nationwide Building Society	Nationwide Building Society	12-14	Wigmore Street	W1U 2DA	Marylebone	Closed	19/02/2015
Santander	Santander	165	Oxford Street	W1D 2JP	Marylebone	Closed	01/05/2015
HSBC	HSBC	18a	Curzon Street	W1J 7LA	Mayfair	Closed	08/05/2015
Barclays Bank PLC	Barclays Bank PLC	91	Baker Street	W1U 6RL		Closed	15/05/2015
The Co-operative Bank PLC	The Co-operative Bank PLC	38	Baker Street	W1U 7BY	Marylebone	Closed	15/05/2015
Santander	Santander	29	Portugal Street	WC2A 2HE	Charing Cross	Opened	03/06/2015
The Co-operative Bank PLC	The Co-operative Bank PLC	186	Queensway	W2 6LY	Paddington	Closed	01/07/2015
HSBC	HSBC	431-433	Oxford Street	W1C 2DA	Mayfair	Closed	30/10/2015
Virgin Money	Virgin Money	6-8	Maddox Street	W1S 1NR	Mayfair	Closed	30/10/2015
Lloyds Bank	Lloyds Bank	8-10	Waterloo Place	SW1Y 4BE	London Haymarket	Closed	11/11/2015
Al Rayan Bank	Al Rayan Bank	77-79	Edgware Road	W2 2HZ	Paddington	Opened	13/11/2015
Islamic Bank Of Britain	Al Rayan Bank	77-79	Edgware Road	W2 2HZ	Paddington	Closed	13/11/2015
Lloyds Bank	Lloyds Bank	8	Marylebone High Street	W1U 4NN	Mayfair	Opened	16/11/2015
Nationwide Building Society	Nationwide Building Society	157-159	Victoria Street	SW1E 5NA	Victoria	Opened	23/11/2015
Virgin Money	Virgin Money	30-31	Haymarket	SW1Y 4EX	London Haymarket	Opened	30/11/2015

open
Early
open
Late

Monday - Friday
8am - 8pm

Saturday
8am - 6pm

Sunday
11am - 5pm

Speak to a Local Person 24/7

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0345 08 08 505

metrobankonline.co.uk

 @Metro_Bank



in-store



online



mobile



phone

Date: 01 December 2015
Our ref: 170247
Your ref: Westminster City Council: New Article 4 Direction for changes



Westminster City Council

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Sirs

Article 4 Direction for changes of use from A1 (shops) to A2 (financial and professional services)

Thank you for your consultation on the above dated 30 October 2015 which was received by Natural England on 30 October 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England does not consider that this Article 4 Direction for changes of use from A1 (shops) to A2 (financial and professional services) poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours faithfully

James Hughes
Consultation Team

Office of Rail and Road

Westminster City Council: New Article 4 Direction for changes of use from A1 (shops) to A2 (financial and professional services)

Dear Sir/Madam,

Thank you for consulting ORR on the above New Article 4 Direction. The Office of Rail and Road has no comment to make on this particular document.

Kind regards

A Harrison
Planning Executive

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Tel: 020 7282 3829 | e-mail anneli.harrison@orr.gsi.gov.uk
Web: www.orr.gov.uk

December 2015

**Pimlico Grid Residents' Association's response to
Westminster City Council Consultation
for new Article 4 Direction for changes of use from
A1 (shops) to A2 (financial and professional services)**

About Us

The Pimlico Grid Residents' Association is a resident-led group representing the interests of everyone living and working within the Pimlico Grid, an area comprising and including the streets lying between Warwick Way, Sutherland Street, Lupus Street, and Denbigh Street; and comprising the largest part of the Pimlico Conservation Area.

Detail

The Pimlico Grid Residents' Association's (PGRA) area of representation is outside the Core Central Activities Zone and designated shopping areas and it wishes its area of representation to remain outside of these large scale shopping and business areas within Westminster. PGRA lies within the Pimlico Conservation area, an area of mainly residential roads dotted with a few small, scale parades of shops, restaurants and services, primarily serving local residential needs. Our area equates to one of London's unique urban villages.

The PGRA objects to the new Article 4 direction for changes of use from A1 to A2 as it is now presented. We believe, if adopted in its current format, the new Article 4 would deleteriously affect our area of representation.

Rationale: If adopted in its current form the new Article 4 change of use would require planning permission for change of use from A1 (shops) to A2 (financial and professional) **only in** the Core Central Activities Zone and designated shopping centres **but not outside** the CAZ and designated shopping areas.

Such a change will afford greater protection against changes of use from shops to large-scale, international, financial and property businesses within the very areas that these large-scale businesses are meant to be operating (i.e., the CAZ and large shopping zones) than it will afford the areas adjacent to the CAZ and large shopping zones.

This is unacceptable. Areas outside CAZ and the designated shopping areas will become prime targets for large, international financial and property businesses to seek to operate. The inevitable outcome will be that small parades of shops and arcades, serving local, residential needs and making a sizeable contribution to the individual character and ambiance of the Westminster Conservation zones will be destroyed.

These parades of unique, boutique establishments and their proprietors will quickly be replaced with large-scale estate agents, financial institutions and professional services, many of which serve foreign investors but not the residential public of London in the very areas of Westminster which are to be protected from these kinds of large-scale, international businesses. A2 businesses will locate outside the Core Activity Zone and Designated Shopping Centres to avoid the planning application required within these two zones.

The result: a serious erosion of the ambiance, charm, character now created by small, independent proprietorship within our small, local parades of shops throughout residential and Conservation areas in Westminster.

Suggestions: Require the same planning permission for A1 to A2 changes of use throughout Westminster thereby affording the same level of protection against A2 overdevelopment within residential and Conservation areas as is afforded to the Core Central Activity Zones and large designated shopping areas.

9th December 2015

Our Ref: P-11-373/Westminster Article 4

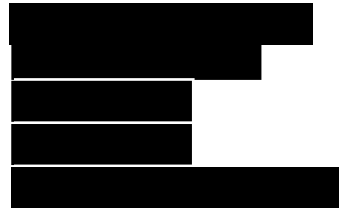
Policy and Strategy

City of Westminster Council

15th Floor, City Hall, 64 Victoria Street,

London

SW1E 6QP



By email to planningpolicy@westminster.gov.uk

Dear Sirs

YOUR REF : 'REPRESENTATION FOR THE NON IMMEDIATE ARTICLE 4- A1 TO A2'

1. Introduction

- 1.1. This submission is made on behalf of Shireconsulting in response to the Council's *"notice of the making of a non-immediate Article 4 Direction intended to remove the permitted development rights for change of use from A1 (shops) to A2 (financial and professional services) in the Core Central Activities Zone (Core CAZ) and designated shopping centres in the City of Westminster"*.
- 1.2. Shireconsulting is a multi-disciplinary practice of town planners and civil/structural engineers based in offices at St Albans and Bromsgrove. Cumulatively, our staff have decades of experience in the planning process and advise a wide variety of clients across the United Kingdom upon planning and development matters, including development control, enforcement and planning policy representations.
- 1.3. We are also very familiar with the issues raised in accommodating Class A2 financial services retailers into shopping area locations and over the years have advised a number of such operators upon the 'roll-out' of their branch networks. This work has involved applications and appeals, as well as advice upon making representations upon unnecessarily restrictive emerging development plan policies. These representations included good quality evidence and cogent argument and resulted in many restrictive policies being revised by Inspectors at Public Examination.

- 1.4. We also made detailed submissions to Central Government whenever there was a review of national policy which related to retail matters. It was evidential representations such as these which led to the reappraisal of the attitude in national policy towards allowing certain non-Class A1 occupiers to find premises within shopping areas.

2. Background

- 2.1. In cases where there is no harm to amenity the Government pre-grants planning permission for certain forms of development. Financial services retailers have always been outside the shops class for the purposes of the Use Classes Order, but have long been viewed as an essential ingredient of the mix which gives a shopping centre its vitality and viability. The Government recognised the need for change and on the 6th April 2014 the Town and Country Planning (General Permitted Development) (Amendment and Consequential Provisions) (England) Order (referred to here as the 'Order', or the 'GPDO') came into force which allowed the occupation of Class A1 premises by a *"deposit-taker falling within Class A2"* as permitted development. The term *"deposit taker"* was closely described in the Order and included a bank, a building society, a credit union, or a friendly society. There were a number of limitations to this permitted change, such as where the site was a site of special scientific interest, or contained a scheduled monument and there were also some conditions to be satisfied (which essentially related to notifying the relevant local planning authority as to when the change of use was taking place).
- 2.2. However, otherwise the permitted change was unfettered by unit size thresholds (often a premises ceiling of 150m² is imposed by the Order upon any pre-permitted change) or, even more crucially in this instance, there was no control over the location of the premises (this can be compared with the change of use introduced for shops to housing the previous year). If the Government had considered this to be a problem it would have been open to it to introduce the same control in relation to shop premises in *"key shopping areas"* as it did in respect of Class 1A allowing the change from a shop to a dwellinghouse.
- 2.3. When the GPDO was again revised in April 2015, the relevant provision (Part 3 Class D) was also rewritten to include all of the remaining Class A2 uses (pay-day loans and betting shops having been taken out of the Use Classes Order) not just 'deposit takers'.

- 2.4. This time there are no limitations or conditions placed upon the permitted development rights in Class D. Having redefined the terms of Class A2, it is clear that the Government expressly intended to allow the remaining uses in this Use Class to be able to locate anywhere within a shopping area. This is not an oversight as the unequivocal position of Part 3, Class D can be compared with the rights given to change shops and other retail uses to restaurants and cafes within Part 3, Class C of the revised Order (Parts J & M of the GPDO 2015 also carry the provision relating to assessing the suitability of the location for the proposed change of use).

3. The Government's Stance

- 3.1. **General Policy** – the policy throughout the National Planning Policy Framework (NPPF) and elsewhere (see for instance HM Treasury's 'Plan for Growth') is predicated upon allowing business and commerce to flourish and removing any obstacles to economic growth. This can be seen specifically in the NPPF within paragraphs such as 18 to 21, where it instructs LPAs *"to address potential barriers to investment"* and not to act as an *"impediment to sustainable growth"*.
- 3.2. Page 41 of the HM Treasury document 'Fixing The Foundations' (July 2015) notes that the planning system is *"regarded by many as one of the most significant constraints facing the economy, bringing delay and inflexibility"*.
- 3.3. Page 73 (paragraph 15.14) of the Treasury's 2015 document continues:
"flexible land markets are central to harnessing the productivity benefits that cities can offer. A more flexible, responsive planning system will enable people to afford to live and work in successful cities, allow firms to expand and urban economies to adapt to new opportunities".
- 3.4. **The Use of Article 4 Directions** - National Planning Policy Guidance (NPPG) provides assistance to LPAs on the matter of Article 4 Directions. Paragraph: 038 (Reference ID: 13-038-20140306) is entitled *"When is it appropriate to use article 4 directions?"* and states that their use *"should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. The potential harm that the direction is intended to address should be clearly identified"*.

3.5. This paragraph of the NPPF continues

“There should be a particularly strong justification [our underlining] for the withdrawal of permitted development rights relating to:

- *a wide area (e.g. those covering the entire area of a local planning authority, National Park or Area of Outstanding National Beauty)....”*

4. Analysis

4.1. The Government wants to promote investment and let economic growth take place and one of the ways it is seeking to achieve this is by relaxing the operation of the Use Classes Order by introducing permitted development rights for those activities that cause no harm to amenity or the wellbeing of an area. Where those rights are to be taken away using Article 4 controls there must be evidence of ‘potential harm’. Government requires *“particularly strong justification”* in cases where GPDO rights are being withdrawn over a ‘wide area’, however in this case there is absolutely no explanation given upon the Council’s website as to why this restriction is about to be imposed.

4.2. It should also be noted that the *“particularly strong justification”*, is even required when promoting an Article 4 in a nationally protected area such as a National Park, or AoNB, it is therefore not the Government’s intention that there would be a need for this degree of ‘wide area’ control in the case of an ordinary London borough.

5. Concluding Remarks

5.1. To conclude there is no evidence of potential harm to amenity or the wellbeing of the area and there is no need to introduce this burden which will discourage investment and unnecessarily interfere with the operation of the market.

5.2. Past experience of Westminster’s consultation process indicates that the LPA goes through the motions but then ignores any comments received and adopts the document/policy without any changes. That makes a mockery of the consultation process, undermining confidence in planning, and the consequent delay and inflexibility confirms the Government’s view that the planning system is a brake on the economy.

5.3. We would be grateful if the Council will continue to notify us of the progress of this consultation.

Yours sincerely

[Redacted signature]

[Redacted name]

On behalf of SHIRECONSULTING

Ccs Correspondence Team, HM Treasury Email: public.enquiries@hmtreasury.gsi.gov.uk

Better Regulation Delivery Office, Email: brdo.enquiries@bis.gsi.gov.uk

Article 4 Direction for changes of use from A1 (shops) to A2 (financial and professional services)

Thank you for consulting Transport for London (TfL) on the above policy consultation.

Whilst it is unlikely that a change of use from Use Class A1 (Retail) to A2 (Professional and Financial services) will result in adverse transport impacts, nonetheless the opportunity to consider such proposals where the Transport for London Road Network (TLRN) or other TfL interests and operations may be impacted from such a change of use would be welcome. Therefore, TfL does not object to the Article 4 direction and has no further comments.

Regards

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For more information regarding the TfL Borough Planning team, including TfL's *Transport Assessment Best Practice Guidance*, and pre-application advice please visit <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>

Please note the changes to our pre application fees from 1st November 2015