



Representation Ref:
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Respondent Ref:
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Part B

This section will need to be completed for each representation made. Please photocopy or download from the council's website additional copies of Part B as required.

Organisation or Name Bristol Food Policy Council

1. To which part of the Site Allocations and Development Management Policies (SA&DMP) does this representation relate?

Development Management policy no.	DM8	Site Allocation ref. no.		Designation name	
Paragraph no.	2.8.1 – 2.8.5	Page no.	15-16		

2. Do you consider the SA&DMP is 'sound'?*

*The considerations relating to a development plan being sound are explained in the National Planning Policy Framework (paragraph 182)

Yes No

If you ticked the 'No' box, do you consider the SA&DMP is unsound because it is not:

- (1) Positively prepared Yes
- (2) Justified Yes
- (3) Effective Yes
- (4) Consistent with national policy Yes

3. Do you consider the SA&DMP complies with the legal / procedural requirements for preparing a development plan?

Yes No

4. Please give details why you consider the SA&DMP is unsound or not legally compliant. Please be precise as possible. If you wish to support the soundness or legal compliance of the SA&DMP please also use the space below to set out your comments.

NHS Bristol and Bristol City Council commissioned the "Who Feeds Bristol?" report, which was published March 2011. The report builds on findings in the Bristol Peak Oil report and explores the strengths and vulnerabilities in the current food system that serves Bristol and the city region in more detail. The report is a study of the main elements of the food system with an analysis of its resilience. It looks at the 'positive powers' cities may have in relation to their food systems and it makes suggestions for action.

One of the vulnerabilities of the local food system that it highlights is the reliance on



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four major national food retailers working to a similar business mode and the need to safeguard the diversity of food retail (para 16.2 of "Who Feeds Bristol?" page 125). The current wording does not do this. It does not take into account the character and resilience of a centre. In particular it does not take these issues into account when considering the impact of proposed developments.

Para 22 of the NPPF refers to the need for centres to be resilient to anticipated future economic change (and we would argue to future social and environmental change as well) and para 70 refers to supporting established shops developing and modernising in a sustainable way for the benefit of the community. The current wording of Policy DM8 does not take these issues properly into account.

Supporting Documents:

1. *"Who Feeds Bristol - towards a resilient food system"* (Joy Carey. March 2011) Bristol City Council, NHS Bristol and Bristol Green Capital Group.
2. *"Building a positive future for Bristol after Peak Oil"* (Simone Osborn, October 2009) Bristol Partnership
3. *"High Street Inquiry: Report and Recommendations"* (Report of the Sustainable Development and Transport Scrutiny Commission, March 2012) Bristol City Council
4. *"Supermarkets"* (Resolution of Bristol City Council, 6 September 2011)
5. *"Good Planning for Good Food: how the planning system in England can support healthy and sustainable food"* (Harriet White and Suzanne Natelson, January 2011) Sustain
6. *"Cornered shops: London's small shops and the planning system"* (London Assembly Planning and Housing committee July 2010)
7. *"Town centres, planning and supermarkets"* (House of Commons Library, May 2012)
8. *"Looking Back, Looking Forward: sustainability and UK Food Policy"* (Sustainable Development Commission, March 2011)
9. *"Job Creation Claims in New Supermarket Retail Development"* (Association of Convenience Stores, July 2010)
10. *"The Right to Retail. Can localism save Britain's small retailers"* (ResPublica Economy Unit, April 2011)
11. *"A Strategy for Successful Community Hubs"* (Commission into Small Shops in the High Street. July 2008) Conservative Parliamentary Enterprise Group
12. *"High Street Britain 2015"* (House of Commons All-Party Parliamentary Small Shops Group. 2006)
13. *"The Portas Review An independent review into the future of our high streets"* (Mary Portas, December 2011)
14. *"Re-imagining the high street – escape from Clone Town Britain"* (Elizabeth Cox, Paul Squires, Josh Ryan-Collins and Ruth Potts. September 2010) New Economic Foundations
15. *"Clone Town Britain"* (Andrew Simms, Petra Kjell and Ruth Potts. June 2005) New Economics Foundation
16. *"Ghost Town Britain II: Death on the High Street"* (Julian Oram, Molly Connisbee, Andrew Simms, December 2003) New Economics Foundation
17. *"Ghost Town Britain: the threat from economic globalisation to livelihoods, liberty and local economic freedom"* (Andrew Simms, Julian Oram, Alex MacGillivray and Joe Drury. December 2002) New Economics Foundation



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18. *"Checking out the Environment? Environmental impacts of supermarkets"* (Friends of the Earth, June 2005)
19. *"Good Neighbours? Community impacts of supermarkets"* (Friends of the Earth, June 2005)
20. *"Endless choice or limitless damage?"* (Dan Welch, Jan/Feb 2011) Ethical Consumer Issue128,
21. *"Food: Supermarkets"* (Leonie Nimmo, March/April 2013) Ethical Consumer Issue141,
22. *"United Kingdom Retail Food Sector: UK retail market brief 2010"* (Julie Vasquez-Nicholson, February 2011) USDA Foreign Agricultural Service
23. *"Growth of the big Four Supermarkets"* (BBC Panorama, December 2010) <http://www.bbc.co.uk/news/uk-12007835>
24. *"Supermarkets: competition enquiries into the groceries market"* (House of Commons Library, November 2011)
25. *"The supply of groceries in the UK: market investigation"* (Competition Commission, April 2008)
26. *"Supermarkets: A report on the supply of groceries from multiple stores in the United Kingdom"* (Competition Commission, October "2000)

(continue on a separate sheet if necessary)

5. Please set out what change(s) you consider necessary to make the SA&DMP sound or legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Proposed revised wording with changes in red and ~~strikeout~~.

Policy DM8: Shopping Areas and Frontages

2.8.1 This policy applies to Bristol's 10 **Town Centres** and its 9 **District Centres** as defined in the Core Strategy and identified on the Policies Map. It aims to support vitality and viability and promote diversity within these centres by maintaining a healthy mix of uses within a variety of unit sizes capable of accommodating a range of retailers and associated uses.

2.8.2 Primary Shopping Areas are defined where there will be a high proportion of Use Class A1 retail shopping uses. Secondary Shopping Frontages are also defined, providing opportunities in centres for a greater diversity of uses.

Within Primary Shopping Areas and Secondary Shopping Frontages identified on the Policies Map development will be expected to maintain or provide active ground floor uses; an appropriate balance between local, independent businesses and multiple traders; and an appropriate balance between convenience (food) retail, comparison (non-food) retail and non-retail uses.

Primary Shopping Areas

Within Primary Shopping Areas change of use of shops (Use Class A1) to another use will not be permitted unless the proposed use would:

i. Make a positive contribution to the character, resilience, vitality, viability and diversity of the Primary Shopping Area and centre; and



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- ii. **Not fragment any part of the Primary Shopping Area by creating a significant break in the shopping frontage; and**
- iii. **Not result in a loss of retail floorspace of a scale harmful to the shopping function of the centre; and**
- iv. **Be compatible with a retail area in that it includes a shopfront with a display function and would be immediately accessible to the public from the street.**

Secondary Shopping Frontages

Within Secondary Shopping Frontages the development of retail or other related uses will be acceptable where they would help to maintain or enhance the function of the centre. In all cases the proposed use will be expected:

- i. **To complement the retail function of the centre and not harm its **character, resilience, vitality, viability or diversity**; and**
- ii. **Not to harmfully dominate or fragment frontages; and**
- iii. **To maintain an appropriate balance and diversity of uses in all parts of the Secondary Shopping Frontage; and**
- iv. **To generate a reasonable level of footfall and be of general public interest or service; and**
- v. **To be compatible with a shopping area in that it includes a shopfront with a display function and would be immediately accessible to the public from the street.**

In all cases, proposals which would result in the loss of retail floorspace, including storage or servicing space, will be expected to demonstrate that they will not be detrimental to the continued viability of the retail unit.

2.8.3 The Primary Shopping Areas identified in the Town and District Centres represent the retail core of those centres. They contain a high proportion of retail shops supported by significant numbers of uses such as cafés, bars, and financial and professional services. In order that the retail function of the town and district centres is not eroded, the policy aims generally to maintain the existing proportion of retail by retaining shops (Use Class A1). However, it provides some flexibility for other uses where they would make a positive contribution to the role of the centre.

2.8.4 The Secondary Shopping Frontages support the overall function of the centres by allowing for a greater diversity of uses. The emphasis remains on active uses at ground floor level but the policy allows for further opportunities for development of uses such as cafés and financial services where they are complementary to the centre's role. In order that secondary frontages still maintain their shopping role the policy aims to ensure that an appropriate balance and diversity of uses is maintained.

2.8.5 'Retail or other related uses' are defined as Use Classes A1-A5 or other similar uses such as gyms, arts and cultural premises and community facilities which would add to the vitality of the area and are considered to be active ground floor uses. Developments such as offices and residential make an overall contribution to the role of centres but are not considered to provide active ground floor uses.

2.8.6 Convenience retailing is the provision of everyday essential items, including food, drinks (non-alcoholic and alcoholic), newspapers/magazines, tobacco, confectionery and non-durable household goods.



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2.8.7 Comparison retailing is the provision of 'non perishable' items not on a frequent basis, which are often stocked in a wide range of sizes, styles, colours and qualities. These include clothing, footwear, toys, DIY goods, household and recreational goods such as furniture, carpets, computers, televisions and white goods (fridges, dishwashers etc). etc.

2.8.9 Multiple retail chains are a range of retail outlets with some or all of the following elements: under the same ownership (but can include franchise operations); share a brand and central management, usually with standardised business methods and practices; dealing in the same merchandise. The Competition Commission (2000) and others have used a definition of a multiple as having ten or more stores.

Application Information

Planning applications should indicate how the criteria in this policy have been addressed.

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support the representation and suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues they identify for examination.

6. If your representation is seeking a change do you consider it necessary to participate at the examination hearings?

No, I do not wish to participate
in the examination hearings

Yes, I wish to participate in
the examination hearings

7. If you wish to participate at the examination hearings please outline why you consider this to be necessary:

We would be happy to attend the examination hearings to elaborate on our representation and to hear the views of other participants on this issue if called by the Inspector.

(continue on a separate sheet if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings.

8. Do you wish to be notified at the address/email stated in Part A of any of the following:



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(1) that the Site Allocations and Development Management Policies have been submitted for independent examination

X

(2) the publication of the recommendation of any person appointed to carry out an independent examination of the Site Allocations and Development Management Policies

X

(3) the adoption of the Site Allocations and Development Management Policies

X

Signature:

KEVIN MORGAN *[Handwritten Signature]*

Date:

09/05/13