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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?

<b>Development Management policy no.</b>	DM9	<b>Site Allocation ref. no.</b>		<b>Designation name</b>	
<b>Paragraph no.</b>	2.9.1 – 2.8.4	<b>Page no.</b>	16-17		

### 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 to supporting established shops developing and modernising in a sustainable way for the benefit of the community. The current wording of Policy DM9 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 DM9: Local Centres**

2.9.1 Throughout Bristol a network of 27 Local Centres serve the day-to-day needs of local areas. These centres are defined in the Core Strategy and identified on the Policies Map. Local Centres generally contain shops providing a range of groceries, fresh food and facilities such as post offices. They also often contain specialist or niche shops ~~which~~ **that** contribute to the diversity and distinctiveness of centres, as well as including cafés, pubs or financial services uses. By ensuring an appropriate balance of uses is supported, this policy aims to maintain and strengthen the role of Local Centres in providing a community focus and in providing for day-to-day shopping needs.

**Within Local Centres shown on the Policies Map development will be expected:**

- i. To generate a reasonable level of footfall and be of general public interest or service; and**
- ii. To maintain an appropriate balance of uses in the Local Centre; and**
- iii. To help maintain or enhance the function of the centre and its ability to meet day-to-day shopping needs; and**
- iv. Not to harmfully dominate or fragment the centre's retail frontages; 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.**

**vi. To ensure there is an appropriate balance between convenience (food) retail, comparison (non-food) retail and non-retail uses;**



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**vii. To ensure an appropriate balance between local, independent businesses and multiple traders.**

**Development in Local Centre frontages will be expected to maintain or provide active ground floor uses. Proposals which would result in the reduction 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.**

2.9.2 The approach to Local Centres allows for a diversity of uses but the emphasis remains on maintaining their role as a community focus and in meeting day-to-day shopping needs.

2.9.3 For the purposes of this policy a retail frontage is defined as a parade or rank of units with uses primarily falling within Use Classes A1 to A5.

2.9.4 '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. Developments such as offices and residential are not considered to provide active ground floor uses.

2.9.5 Convenience and comparison retailing are defined in paragraphs 2.8.6 and 2.8.7.

2.9.6 Multiple traders are defined in paragraph 2.8.8.

(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.



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

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

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

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

**Signature:**

KEVIN MORGAN *Kevin Morgan*

**Date:**

09/05/12