



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.	DM7	Site Allocation ref. no.		Designation name	
Paragraph no.	2.7.1 – 2.7.7	Page no.	13-14		

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.



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One of the vulnerabilities of the local food system that it highlights is the reliance on 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. Core Strategy policy BCS7 refers to large-scale developments being in keeping with the role of a centre. The current wording of Policy DM7 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 form 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



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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
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 Issue 128,
21. *"Food: Supermarkets"* (Leonie Nimmo, March/April 2013) Ethical Consumer Issue 141,
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 DM7: Town Centre Uses

2.7.1 The Core Strategy explains the key role of Bristol's established centres. Policy BCS7 identifies centres as the primary locations for retail development, offices, leisure and entertainment uses, arts, culture and tourism uses, defined by the National Planning Policy Framework as the 'main town centre uses'. It also requires that development be of a scale and intensity appropriate to the position of the centre in the identified hierarchy.

2.7.2 This policy deals with the location of new main town centre uses. Bristol's centres provide a range of opportunities for such development whether through change of use, redevelopment or more efficient use of land. Where suitable sites are not available in centres to meet development needs, this policy sets out a sequential approach to development. It also aims to ensure that development outside centres does not harm the **character, resilience**, vitality, viability and diversity of existing centres.

2.7.3 Policies DM7, DM8 and DM9 only apply to proposals for development outside the city centre shown on the Policies Map. Proposals for development within the city centre will be assessed against the relevant policies of the Bristol Central Area Plan.



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Retail and other main town centre uses should be located within the centres identified on the Policies Map.

Where there are no suitable sites to meet the needs for such uses in centres, edge of centre locations may be appropriate provided that the proposal would support the role of the centre and would be of a scale and intensity proportionate to the centre's position in the identified hierarchy.

Out of centre development of main town centre uses will only be acceptable where:

- i. No centre or edge of centre sites are available and the proposal would be in a location readily accessible on foot, by cycle and by public transport, or**
- ii. The proposal is of a small scale and aimed at providing for local needs.**

In assessing the availability of centre and edge of centre sites, alternative formats for the proposed uses should be considered.

Retail, leisure or office development outside of centres will not be permitted if:

- i. It would be liable to have a significant adverse impact on the **character, resilience**, vitality, viability and diversity of existing centres; or**
- ii. It would impact on existing, committed and planned investment.**

Retail developments of 2,000m² or more will not be permitted.

An impact assessment will therefore be required for:

- * Retail developments of 500m² or more in all locations outside Primary Shopping Areas or Local Centres;**
- * Developments in Use Classes A2 to A5 of 1,500m² or more in all locations outside centres;**
- * Other leisure developments of 2,500m² or more in all out of centre locations;**
- and**
- * Office developments of 10,000m² or more in all out of centre locations.**

2.7.4 The boundaries of Town, District and Local Centres, and the Primary Shopping Areas of Town and District Centres are defined on the Policies Map.

2.7.5 The Primary Shopping Area identified within each Town/District centre is considered to be the 'centre' for the purposes of the sequential approach to retail developments (Use Class A1). This means that locations within a centre but outside the Primary Shopping Area are considered to be edge of centre for this form of development. Out of centre is defined as locations outside the boundaries of City, Town, District and Local Centre boundaries and beyond edge of centre locations as defined by the National Planning Policy Framework.

2.7.6 Main town centre uses are defined in the National Planning Policy Framework as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities and the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos,



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health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

2.7.7 The policy allows for the provision of small-scale retail and leisure developments outside centres where they are aimed at providing for local needs. Small-scale uses would generally be expected to have floorspace no greater than 200m². Larger proposals would be subject to the sequential approach set out in the policy.

2.7.8 Across Bristol, there is already a significant number of big retail developments, including superstores and retail warehouses. With a fragile economy and increasing levels of internet shopping there is a declining demand for retail floorspace. Therefore there is no need for any new, large retail developments. Large retail developments can also dominate a centre, create local monopolies, undermine small local, independent established businesses and reduce the resilience of the local economy, supply chains and sustainable food systems.

Application Information

The following should be submitted with planning applications to show how the proposal addresses this policy:

* In the case of proposals outside of centres applications should explain the need proposed to be met by the development and include an assessment of the availability of suitable sites in centres.

Detailed impact assessments for proposals outside of centres which exceed the thresholds set out in the policy. Assessments should address:

- * The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal;
- * The impact of the proposal on town centre **character, resilience**, vitality and viability, including local consumer choice and the range and quality of the comparison and convenience retail offer;
- * **The impact on local parades and shops that provide more than 'top-up shopping' for some groups, as well as designated centres;**
- * **The impact on access to affordable, safe, and nutritious food, particularly 'cooking from scratch' ingredients;**
- * **The impact on independent retail sector, local suppliers and the wholesale distribution infrastructure;**
- * **The impact on competition of any new development of over 1,000 sq m (or applications for extensions which would result in a net sales area of 1,000sq m, or the cumulative increase in floorspace of developments by any individual retailer in the last five years (within a ten-minute drive time) in line with the recommendation of the Competition Commission (October 2009);**
- * **The impact on local retail, wholesale and other employment (in full-time equivalents)**
- * The impact of the proposal on allocated sites outside town centres being developed in accordance with the development plan;
- * In the context of a retail or leisure proposal, the impact of the proposal on in-centre



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trade/turnover and on trade in the wider area, taking account of current and future consumer expenditure capacity in the catchment area up to five years from the time the application is made; and
 * If located in or on the edge of a town centre, whether the proposal is of an appropriate scale (in terms of gross floorspace) in relation to the size of the centre and its role in the hierarchy of centres.

If the local planning authority considered any of the impacts on their own, or in combination, were unacceptable, this would be a reason for refusal.

(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:

- (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



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Signature:

KEVIN MORGAN *pp* *Kevin Morgan*

Date: 09/05/13