

<b>Neighbourhood Planning Network</b>
<b>Tuesday 19 July 2011</b>
<b>Managing and Regulating Multiple Food Retailer Chains in Bristol</b>
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## Report

Although the 'Big Four' (Tesco, Asda, Sainsbury and Morrisons) multiple food retail chains are successful businesses and a lot of people choose to shop at them, find them convenient, are happy with the quality of the goods and value the reassurance of a known recognisable brand, "Who Feeds Bristol" and a range of other reports have documented a wide range of concerns about their expansion and increasing dominance of the market locally and nationally.

There has been an increasing domination of the food retail sector by the 'big four' retailers, both nationally and locally. Currently they have 76% of the national food market, compared to 63% 15 years ago, with Tesco in particular increasing market share from 19.3% in 1994 to 30.6% in 2010 (see Appendix 1).

"Who feeds Bristol?" report provides a good overview of the situation in Bristol and shows that Bristol overall has a relatively high density of stores owned by the 'big four' compared with other cities. For example in Bristol there is one Tesco per 18,900 people, compared to one per 38,100 in Leeds, one per 40,000 in Sheffield and one per 69,100 in Greater Manchester.

The pressure on local independent stores has increased in recent years as the Big Four retailers, led by Tesco, have started to expand into the convenience store sector with smaller format stores such as Tesco Express and Sainsbury Local.

As well as the direct impact on local retailers by the loss of trade to the multiple food retail chains (originally to large, often out-of-centre, superstores, but more recently also to the smaller convenience stores), there is the indirect impact on local suppliers and wholesalers. "Who Feeds Bristol?" identifies the increasing vulnerability of the Bristol Wholesale Fruit Centre at St Phillip's. The continuing expansion of the multiple retail food chains will lead to a tipping point when the wholesale market will become unviable, with serious consequences to independent retailers and caterers if it was to close.

There are concerns about the detrimental impact on the character, diversity and vitality of local centres, on employment, the local business and the circulation of money in the local economy and on the transport system, from both servicing and deliveries and from car-borne shoppers.

In some areas supermarket developments are welcome as a means of regenerating poorly performing centres and improving access to fresh fruit and vegetables (eg Morrisons at Symes, Hartcliffe; Tesco in Southmead).

A clear distinction needs to be made between the different concerns relating to the following and how they are regulated:

- **The building** (eg small convenience store or large superstore, is it accessible and well-designed or not, what are the servicing arrangements, is it a listed building, is it new build or refurbishment)
- **The location** (in centre or out of centre, in a prosperous vibrant centre or a poorly performing centre on a deprived outer estate, in a conservation area)
- **The use** (retail or non-retail; food or non-food; what is being sold, when is it open)
- **The operator** (eg a local independent, a franchise, a local retail chain, a national or international multiple retail chain)

Although planning powers can control major new retail developments, there are significant limitations when it comes to convenience store developments by the multiple food retail chains.

What concerns are legitimate ones for planning control? – And how are they brought within the planning system?

They include:

- **The diversity, character, vitality and viability of local centres.** In some centres the concern is the "clone town Britain" effect, where there are other poorly performing centres where a supermarket anchor store would be welcomed
- **Servicing and delivering to stores.** The servicing requirements of a convenience supermarket are very different to other retail uses
- **The loss of community pubs** to retail
- **The local economy and local employment** – including the impact on local suppliers and the wholesale and distribution infrastructure

The review of the Use Classes Order (deadline for responses is 1 Sept 2011) [www.communities.gov.uk/publications/planningandbuilding/changeuseissues](http://www.communities.gov.uk/publications/planningandbuilding/changeuseissues) with consequential changes to the General Development Order, provides an opportunity. The proposed National Planning Policy Framework will be another significant influence.

A possible new retail use (Class A1) for discussion – making a distinction based on the size of shop and what it sells:

- a) Small convenience store (up to 250 sq m)
- b) Supermarket – larger convenience store (over 250 sq m)
- c) Small comparison store (up to 250 sq m)
- d) Larger comparison store (over 250 sq m)
- e) Pharmacy
- f) Other retail (hairdressers, travel & ticket agencies, domestic hire shops, dry cleaners, funeral directors, internet cafes, sandwich bars)

A range of broader concerns with the multiple food retail chains and their business model have been identified:

- Agricultural practices (factory farming, animal welfare, use of pesticides and oil based fertilisers)
- Relationships with suppliers
- Food production and distribution (food miles)
- Packaging and food waste
- Healthy eating (sale of highly processed high fat/sugar/salt foods)
- Climate change and use of fossil fuels
- Consumer choice and enterprise
- Monopoly and competition (national and local)

The complexity and the range of issues indicate the difficulties involved in managing and controlling the multiple food retail chains and developments by them. This needs a new, more sophisticated approach that will require a range of policy interventions and a creative use of different types of regulation regimes (Appendix 3). In developing such a new approach we need to:

- Be clear about what it wants to achieve; what is the harm it wants to avoid/mitigate.
- Identify clear, objective and justifiable criteria that can be used to distinguish between different retailers or between different retail uses.
- Have a strong evidence base to support its actions. In pioneering a new approach there is a risk that it could be subject to challenge.
- Recognise that retailing is dynamic market that may not respond as anticipated. In trying a new approach, there may well be unintended consequences
- Explore different regulatory regimes here and abroad
- Provide positive support to local centres

A number of potential options (planning powers, licensing, bye-laws) are identified that need to be explored further as to their legal feasibility, practicality, effectiveness, enforcement and any financial implications, including the use of the Sustainable Communities Act and the power of wellbeing (or competence) to introduce a local Bristol approach.

### **Recommendations**

Views are requested

### **View of the Head of Legal Services**

The legislative framework in this area is complex. It includes European legislation eg the legislation concerning state aid, national legislation and all the areas of regulation referred to in the report. The fundamental principles underlying the European community are also engaged - ie the free movement of goods and trade.

The analysis in the report is sound - in particular the points that any policy must:

- Be clear about what it wants to achieve; what is the harm it wants to avoid/mitigate.
- Identify clear, objective and justifiable criteria that can be used to distinguish between different retailers or between different retail uses.
- Have a strong evidence base to support its actions. In pioneering a new approach there is a risk that it could be subject to legal challenge

Legal advice will be provided when there is greater clarity on the above

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## APPENDIX 1. Market Share by Retailer

<b>Retailer</b>	<b>2010 Market share%</b>	<b>2010 Cumulative share %</b>
1. Tesco	30.6	30.6
2. Asda/Wal-Mart	17.2	47.8
3. Sainsbury	16.2	64.0
4. Morrisons	11.7	75.7
5. Co-operative	6.8	82.5
6. Waitrose	4.2	86.7
7. Aldi	3.0	89.7
8. Lidl	2.4	92.1
9. Iceland	1.7	93.8
10. Netto	0.7	94.5

<b>Retailer</b>	<b>1999 Market share%</b>	<b>1999 Cumulative share %</b>
1. Tesco	24.6	24.6
2. Sainsbury	20.1	44.7
3. Asda	15.3	60.0
4. Safeway	10.7	70.7
5. Somerfield/Kwik Save	9.1	79.8
6. Morrisons	4.9	84.7
7. Co-operative	4.4	89.1
8. Iceland	3.4	92.5
9. Waitrose	1.5	94.0
10. Lidl	0.9	94.9
11. Netto	0.9	95.8
12. Aldi	0.7	96.5

<b>Retailer</b>	<b>1994 Market share%</b>	<b>1994 Cumulative share %</b>
1. Sainsbury	22.0	22.0
2. Tesco	19.3	41.3
3. Asda	10.9	52.2
4. Safeway	10.4	62.6
5. Kwik Save	6.9	69.5
6. Co-operative	6.6	76.1
7. Somerfield	6.3	82.4
8. Morrisons	3.6	86.0
9. Iceland	3.4	89.4
10. Waitrose	1.4	90.8
11. Netto	0.6	91.4
12. Aldi	0.3	91.7

## **APPENDIX 2. Concerns about Supermarket Development**

### **1. Introduction**

There has been growing concern about the changes to the local food retail sector with the continuing expansion of the 'big four' food retailers into the convenience shop sector. This has been documented locally in "Who Feeds Bristol" and nationally by BBC's Panorama programme and a range of reports.

Within Bristol, a number of high profile retail planning applications (eg: the conversion of the Friendship Inn, Knowle by Tesco; Tesco on Cheltenham Road, near Stokes Croft; Sainsbury taking over the former Woolworth's site on Whiteladies Road; and the Sainsbury superstore at Ashton Gate) has highlighted the community interest. It has also highlighted the limitations of current planning legislation and policy in relation to new convenience store developments, where planning permission is not needed for the principle of the development, as against the quality of the design of any new shopfront.

The supply of groceries by supermarkets was referred to the Competition Commission (2000) on three issues:

- Public perception that the price of groceries in the UK tended to be higher than in other comparable EU countries and the USA
- An apparent disparity between farm-gate and retail process, which was seen by some that grocery multiples were profiting from the crisis in the farming industry
- Continuing concern that large out-of-town supermarkets were contributing to the decay of the high street in many towns

In May 2006, the Office for Fair Trading (OFT) referred the supply of groceries by retailers in the UK to the Competition Commission, which reported in April 2008. In its reference decision, the OFT found that there were several features of the market for the supply of groceries by retailers in the UK that could reasonably be suspected to be preventing, restricting or distorting competition. It was concerned that:

- The planning system could restrict or distort competition by raising the cost of, and also limiting the scope for, entry, particularly by way of new large format stores;
- The land holdings of large grocery retailers and their use of restrictive covenants could be used to reinforce their existing market position in some local areas and this could have an anti-competitive effect;
- There was evidence to suggest that the buyer power of the major grocery retailers had increased since 2000 and that the differential between suppliers' prices to large grocery retailers compared with those for wholesalers and buying groups had increased, and that this increase in buyer power could harm consumer choice by undermining

the viability of alternative business models, including wholesale distribution to the convenience store sector; and

- Aspects of the major grocery retailers' pricing policies—below-cost selling and 'price flexing'—could distort competition, although the extent of the possible distortion was unclear.

The Bristol Partnership's Healthy City Group (January 2011) in its response to the planning application by Sainsbury for a superstore at Ashton Gate commented that:

- "The growth in supermarket chains is having a negative impact on three determinants of health namely local jobs, local wealth and social capital. For every pound spent in an independent local retail store or market more jobs are created and more money circulates in the local economy than for equivalent expenditure in a chain supermarket. A knock on effect of local shop closures will have a detrimental impact on social capital and local support networks as a consequence of a less populated and convivial public realm.
- The growth in supermarket chains is leading to growing car-dependency. This compounds inequalities by damaging access to local services for those without access to a car, and for those with health problems that prevent them being able to drive. Transport fuel will become more expensive in the future therefore the vulnerability created by car-dependency will extend to a greater proportion of the population.
- There are additional concerns that the Group has in relation to the dominance of highly processed high fat/sugar/salt foods that are on offer and promoted in supermarkets, and in relation to the impacts on soil and biodiversity from the intensive agricultural practices that are required for the supermarket chains to compete on price."

A range of reports by the New Economic Foundation highlighted concerns that the growth of retail multiple chains and the decline in independent stores, was leading to a loss of diversity and local character in our town centres and the growth of what they have called 'Clone Town Britain'.

The growth of superstores, with an increasing range of non-food sales area, along with other changes in retail patterns (eg internet shopping) has meant the decline in independent stores has not just been in grocers, bakers and butchers, but in a range of different shops (eg off-licences, newsagents, furniture, hardware, books, records, photographic equipment and petrol filling stations) and in specialist multiple chains (eg Woolworths, Oddbins, Virgin Records, Threshers/Bottom's Up/Victoria Wine). Similarly in sandwich shops, restaurants, cafes and pubs there has been an expansion of national chains, such as Greggs, Costa Coffee, Starbucks, MacDonalds, Pizza Hut and Subway, at the expense of local independent businesses.

There are concerns about the detrimental impact of the continuing growth of multiple retailers on the local economy. This has three aspects: on employment; on local businesses; and on the circulation of money.

The Association of Convenience Stores report "Job Creation Claims in New Supermarket Retail Development" (July 2010) challenges many of the claims that supermarkets make about the number of jobs created and the assumptions underlying them. The House of Commons All-Party Parliamentary Small Shops Group report "High Street Britain: 2015" (2006) states that:

"In 2004, the convenience store sector accounted for over 500,000 employees from a turnover of around £21bn. By comparison, the Big Four superstores employed 800,000 people against a turnover of around £76bn. This equates to £42,000 turnover per member of staff in the convenience store sector, versus £95,000 turnover per member of staff in superstores." (pp 11-12).

As well as the direct impact on local retailers by the loss of trade to large (often out-of-centre) superstores, there is the indirect impact on local suppliers and wholesalers. "Who Feeds Bristol?" (pages 36-40) identifies the increasing vulnerability of the Bristol Wholesale Fruit Centre at St Phillip's and the consequences to independent retailers and caterers if it was to close.

The pressure on local independent stores has increased in recent years as the Big Four retailers, led by Tesco, have started to expand into the convenience store sector with smaller format stores such as Tesco Express and Sainsbury Local. Asda and Morrison have been slower in this.

With local independent stores with local owner, employing more local people and using local producers and suppliers then money circulates around the local economy more than money spent in supermarkets where a higher proportion leaves the local economy to pay headquarter staff, shareholders, national and international producers and suppliers.

In a Bristol context, the development of regional warehouse and distribution centres at Avonmouth and Severnside brings local benefits, albeit at the expense of other areas. Though it also brings increasing vulnerability given the flood risk of the area.

Although the multiple food retail chains are subject to a wide range of criticism, there are a number of positive aspects.

It may be stating the obvious, but they are successful businesses and a lot of people choose to shop at them, find them convenient, are happy with the range and quality of the goods and value the reassurance of a known recognisable brand. They can be very responsive to changes in demand and be innovative.

They provide a range of part-time employment that meet some people's employment needs and can fit around their care and other responsibilities.

There are also examples where they address problems of market failures and a lack of access to safe affordable fresh food such as the redevelopment of Symes district centre in Hartcliffe with Morrisons.

Finally it is worth noting that although a number of these trends can be seen in other retail sectors (eg DIY, electrical goods, furniture and carpets), food and drink is special because it is essential to life. It is not just another commodity and therefore it is worthy of particular attention.

“Building a positive future for Bristol after Peak Oil” (2009) notes that “Bristol is part of a globalised food production and distribution system which is highly dependant on oil for industrialised agricultural methods and complex food chains” and that “cheap supermarket food relies on access to diverse markets with cheap labour, centralised distribution and ‘just-in-time’ delivery models, all of which are threatened by peak oil.”

The car-dependency of supermarkets, the levels of refrigeration, air conditioning and ICT equipment, and national just-in-time road-transport based distribution systems means increasing levels of carbon emissions at a time when Government targets are to reduce carbon emissions.

There are also global environmental concerns linked to the supermarket demands (reflecting or driving consumer demand?) for food all-the-year round (strawberries and asparagus at Christmas) and of a consistent appearance, size, shape and quality – eg heated greenhouses; factory farming; mega-dairies; air freighted fruit and vegetables from around the world; irrigation in water-stressed countries, use of oil-based pesticides, herbicides and fertilisers – and consequential large amounts of food waste of food not meeting standards or sell-by dates. There is also criticism of the excessive packaging required.

Although they do supply fresh fruit and vegetables, multiple food retailers are also supply and promote highly processed high fat/sugar/salt foods with their health concerns and ready meals, undermining cooking skills.

The increasing costs to the health service and to wider society of unhealthy diets and increasing obesity have been well documented. There are also the health implications of increasing car use on physical activity and air quality.

### **APPENDIX 3. Different Regulation Regimes**

The complexity and the range of issues highlighted above indicate the difficulties involved in managing and controlling the multiple food retail chains, which will require a range of policy interventions and a creative use of different types of regulation regimes. Some action can be taken locally, while others will need change in national and possibly European legislation around competition and state aids to industry.

There have been some expectations amongst parts of the community that the City Council's planning powers are greater than they actually are and that planning powers can control all these elements, when in fact it cannot.

Although planning powers can control major new retail developments such as superstores, there are significant limitations when it comes to convenience store developments by the multiple food retail chains, which are within one use class (A1 shops) or a permitted development between use classes (ie A3 restaurants and cafes, A4 drinking establishments or A5 hot-food take-away to A1 shops). Planning control may then only be about the quality of the design of the shop-front.

Traditionally planning can consider whether the location and/or the building is appropriate for the proposed use, but who the operator is has not been a material planning consideration. Also, in planning terms a shop (Use Class A1) is a shop whether it sells books, clothes or baked beans. Any restriction of this needs to be justified (eg use of Section 106 agreements to limit what is sold in out-of-centre warehouses to bulky goods such as furniture, carpets and DIY).

Thus a shopkeeper who sells books and then wants to start selling clothes will not need to apply for planning permission. Similarly when there is a change of owner (eg Morrisons taking over Safeway or the Co-operative taking over Somerfield) there was no need for planning approval (except for signage of the new owner).

[It is worth noting that there was need for Competition Commission approval because of national and local competition concerns leading to Morrison and the Co-operative having to sell off a number of stores in certain areas because of local monopolies. However if local monopolies happen through organic growth or closures rather than takeovers then it is outside the remit of the Competition Commission.]

In October 2009 the Competition Commission formally recommended to the government a 'competition test', to which planning applications for the development of grocery stores with a net sales area in excess of 1,000sq m (or applications for extensions which would result in a net sales area of 1,000sq m) would be subject. Under the test, the Office of Fair Trading, as a statutory consultee, would advise local planning authorities on the potential impact of any new development. This would look at what other retailers were operating within a ten-minute drive-time of the development site with the aim of increasing competition locally.

The managing and controlling of multiple food retail chains needs a new, more sophisticated approach than just current planning powers on their own. Set out below is a number of potential options that need to be explored further as to their legal feasibility, practicality, effectiveness, enforcement and any financial implications.

Some are very likely to need changes in national policy or legislation. The recent letter from the Department of Communities and Local Government (16 December 2010) responding to the City Council's request for a change in the use class in respect of small sale supermarkets suggests that national change is unlikely, or at least without a major campaign effort (through the Local Government Association, Core Cities and professional institutes for example).

Thus it will be necessary to look at the extent the Sustainable Communities Act and the power of wellbeing (or competence) can be used.

#### **a. Planning Powers**

There is a number of planning powers that should be looked at to see to what extent they would be appropriate in retail setting and could be used.

- Article 4 Directions that remove permitted development rights and are issued by the Council in circumstances where specific control over development is required, primarily where the character of an area of acknowledged importance would be threatened. This could need a change in Use Class A1 (shops), for example dividing it into food and non-food retailing and/or by size.
- Temporary or personal planning permissions
- Section 106 agreements covering the types of goods sold or floorspace given over to certain uses.
- In the same way that new housing developments over a certain size have to include a proportion of affordable housing, could new retail developments over a certain size include a proportion of retail space for local independent stores?
- In the same way that development management policies restrict the proportion of non-retail uses in primary shopping frontages, could policies restrict the proportion of multiple chains in a retail centre?

One major limitation on the use of planning powers is that they are limited to new developments and are not retrospective. Where there is no development or change of use, then it will not come within the scope of the planning system, will not necessarily come to the attention of the local planning authority and will not require planning permission.

#### **b. Licensing**

Various uses such as public houses, off-licences, places of entertainment, betting shops and sex shops are licensed by the City Council, while pharmacies are regulated through the General Pharmaceutical Council and the NHS. Licensing can cover the operator, the premises, the use and how it operates (eg opening times) and be time limited. They provide a detailed level of control, though the grounds for refusing a licence may be limited.

Could licensing powers be extended (beyond food hygiene/safety) to cover the premises used for food retailing, what is sold and the operators?

### **c. Bye-laws**

The Council may apply to the Secretary of State for permission to operate bye laws covering particular activities. These are effectively local laws to deal with local issues. Failure to comply with bye laws is a criminal offence.

Under the Local Government Act 1972, the council has the power to make byelaws "for the good rule and government" of their area, provided it is not used in connection with anything already covered under other legislation.

Section 6, Food Act 1984 allows for the regulating of markets, such as opening hours, allocation of pitches, maintaining cleanliness, preventing obstruction, use of water taps and prevention of fires.

Could bye-laws be introduced to regulate food retailing and food retailers?

### **d. Land ownership**

Where the City Council is the landowner/landlord then it can use clauses in leases and covenants to control future development and use of the property.

### **e. Sustainable Communities Act 2007**

The aim of the Sustainable Communities Act is to promote the sustainability of local communities. Under it, councils are given the power to make proposals to the Secretary of State, as to how government can 'assist councils in promoting the sustainability of local communities'.

On 15 December 2010, the Secretary of State issued an invitation to local authorities under the Sustainable Communities Act 2007. The letter asks councils to consult their communities on how they would like to improve their local area, take whatever action they deem appropriate, and request the Government remove any bureaucratic barrier which is stopping them. An online portal has been set up at <http://barrierbusting.communities.gov.uk>

### **f. Power of well-being (or competence)**

Section 2 of the Local Government Act 2000 (the '2000 Act') allows principal local authorities in England and Wales to do anything they consider likely to promote the economic, social and environmental well-being of their area unless explicitly prohibited elsewhere in legislation.

Under the Localism Bill, the Government is intending to replace the existing well-being power with a general power of competence for local government. It is intended to change fundamentally the way local government behaves, giving them the same capacity to act as an individual generally has, which will enable them to do anything apart from that which is specifically prohibited.

## DEFINITIONS

### 1. Types of stores

The types of food stores fall into the following categories, although there is no universal definition. Asda and Morrison currently have very few convenience stores, while the Co-operative is almost entirely in the convenience store or supermarket sector.

Type	Approx size sq metres	Range of goods and indicative number of lines	Typical location	Examples
Hypermarket	5,000 +	Broad range of grocery and very broad range of non-food items. In-store units (eg pharmacy, hairdresser) 40,000 lines	Out of centre 800+ car parking spaces	Tesco Extra
Superstore	2,500 +	Full range of grocery and broad range non-food items 15-25,000 lines	Out of centre, edge of centre or district centre anchor 400+ spaces	Tesco Superstore
Supermarket	250 – 2,500	Broad range of grocery items 8-15,000 lines	Town and district centres	Sainsbury's Central Tesco Metro
Convenience store	300 or less	Limited range, top-up, high margin 2.5-3,000 lines	Local centres Garage forecourts	Sainsbury's Local Tesco Express

### 2. Types of retailing

**Convenience shopping:** 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.

**Comparison shopping:** 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.

### 3. Multiple retail chains

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. There is no universal common definition of a multiple chain and there is a wide range of different types of chains.

Chains can be defined by both size and geographic spread. Size can be defined by the number of shops (eg 1-10; 11-50; 51-100; 100+), total floorspace, the number of employees and/or turnover. Geographic spread considers whether they operate within a local area, one region, across the whole country or globally.

A possible typology of chains is:

1. Single - one shop
2. Small local chain - two or three shops within the same local authority, town or city
3. Local chain – four or more shops within the same local authority, town or city
4. Small regional chain – two to five shops within the same region or two regions
5. Regional chain – six or more shops within the same region or two regions
4. National chain - shops in three or more regions
5. Super national - shops in every region of the country - including Scotland, Wales and Northern Ireland
6. International Chains

The Competition Commission (2000) used a definition of a multiple as having ten or more stores of more than 600 sq metres, of which at least 300 sq metres was devoted to the sale of food and non-alcoholic drinks.

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