



Briefing

How to...oppose a supermarket planning application:

A short guide

Though the devastating impacts of out-of-town supermarkets on communities and local businesses are well known, more than half of new retail space is still being built out of town and the supermarkets continue to expand at a massive rate. Tesco alone plans to open 111 new stores in 2005/6, and could in the future capture as much as 40 percent of the food retail market.¹ In-town and “edge-of-town” supermarkets are now also starting to dominate our high streets. But local campaigners are not giving up – in fact all over the country, communities are showing that by building alliances with other local groups, good communications and working with decision-makers in their area, it is possible to oppose and stop bad developments. This briefing will guide you and your local group in opposing supermarket applications in your local area. It provides a step-by-step guide to making your way through the English planning system, leading you to the evidence that will help you win.

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The rise and rise of the supermarkets

Supermarket expansion may seem unstoppable. There are now more than 3,000 supermarkets in the UK.ⁱⁱ The market leader, Tesco, currently holds more than 30 per cent of the UK market share.ⁱⁱⁱ And despite a change in planning regulations discouraging out-of-town development, more than half of new retail space is still being built out of town, drawing people away from shopping in their communities and damaging town centres.^{iv}

Data from the Department of Trade and Industry (DTI) shows that the UK has lost 50 independent shops a week over the last decade.^v Emissions and pollution from traffic is rising dramatically and the average person now travels 893 miles per year to shop for food.^{vi} Suppliers, farmers, the environment, and smaller retailers are squeezed as the “big four” extract ever better deals from their market dominance.

Communities fight back

Is it possible to resist the rise of the supermarkets? To many it seems that the answer is no. The government supports their expansion. The local planning system, which governs how land is developed, is complex, seemingly ever-changing and stacked against objectors.

But despite this, all over the country, community activists, concerned citizens and local businesses are fighting back. Friends of the Earth has evidence of more than 100 planning disputes currently taking place across the country. Armed with the right information, knowledge of the planning system and convincing arguments, campaigners in Brighton, Suffolk, Edinburgh and Walsall have recently won their cases.^{vii}

As a member of the public, you have the right to examine and comment on planning applications as they are made. Developers like to accuse objectors of being “anti-progress.” But we believe that local people should be listened to and have a right to help shape their community.

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1. **Supermarkets: the case against:** Some basic facts about the impacts of supermarkets to get you started
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1. Supermarkets: the case against

Supermarkets claim that when they come to town they bring choice, cheap food, development and jobs. But the reality is different

1. **Local choice is eroded** as smaller, independent shops struggle to compete with the supermarkets. Between 1997 and 2002 more than 13,000 specialist stores around the UK – including newsagents, Post Offices, grocers, bakers, butchers - closed. The loss of local, independent shops can have serious impacts in terms of access to food, particularly for people on lower incomes or those who don't have use of a car.^{viii}
2. **Money is siphoned away** from local communities and towards shareholders and distant corporations. A Friends of the Earth study of local food schemes^{ix} found that on average just over half of business turnover was returned to the local economy – compared to as little as five per cent for supermarkets.^x
3. **Traffic congestion increases.** The distribution systems used by supermarkets and the location of out of town stores generate large amounts of traffic. Recent work for the Department for Environment, Food and Rural Affairs (Defra) suggests that car use for shopping results in costs to society of more than £3.5 billion per year, from traffic emissions, noise, accidents, congestion and accidents.^{xi}
4. **Local jobs are lost.** Supermarket claims that new stores bring in jobs fail to consider the wider picture of independent retailer bankruptcies. A 1998 study by the National Retailer Planning Forum (NRPF) examining the employment impacts of 93 superstore openings between 1991 and 1994 found that they resulted in a net loss of more than 25,000 jobs or 276 per store opened.^{xii}
5. **Food and packaging waste is generated.** Packaging now makes up nearly a quarter of household waste.^{xiii} A shocking 35-40 per cent of all household waste which ends up in landfill begins life as a purchase from one of the big five supermarkets.^{xiv}
6. **Suppliers are exploited and the environment is damaged.** Supermarkets use their market dominance to exploit suppliers and farmers and drive down prices, thus ensuring that environmentally damaging practices are continued both in the UK and overseas.

2. A guide to the English planning system

Help! I've heard a supermarket is considering a planning application in my local area. What do I do?

Anyone who wants to develop land for new housing, shops or industry needs to get **planning permission** from their local council. This means submitting a **planning application** on which the council decides whether or not the development should go ahead. Whenever a local planning authority receives an application it is bound by law to publicise it and to consult affected organisations – and you will have the opportunity to make your views known.

The table overleaf provides an outline of the key stages a planning application in England has to pass through. Don't be put off by the complexity. There is a lot of information out there to help you through the process. If you don't understand, your local planning office has a statutory duty to explain what is going on.

The planning system may seem arcane, over-complex and intimidating. But getting to know something about it is the best way to get your voice heard and have an influence on the decisions being made. Many local councillors in your area may well want to protect their town from being bullied by the major retailers – but when the only voices they hear are those of the representatives paid to promote the supermarkets, it is hard for them to make decisions that reflect that. With a bit of knowledge about the process, and a lot of knowledge of your local area (which the supermarket lobbyists will *not* have), you can let them know that your community is worth protecting.

A more detailed summary of the planning process and how you can get involved is available in Friends of the Earth's briefing "*A Campaigner's Guide to Planning Applications*" (see Section 7 for further details).

Is this briefing relevant to Wales or Northern Ireland?

No. The planning system is different in Wales and Northern Ireland. If you are based in NI please contact Deborah McLaughlin in the Belfast office. If you are based in Wales please contact Naomi Luhde-Thompson in the Friends of the Earth Cymru office for more information on their supermarkets campaign.

So tell me how it works...

| Stage in the planning process | What happens | What you can do |
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| <p>Pre-application discussions</p> | <p>Supermarkets plan their campaigns well in advance of making a planning application. They purchase sites in prime locations, approach council officials, build relationships, do deals and run campaigns in the local press.</p> | <p>This is when early intelligence counts. Building relationships with the planning office, local councillors, landowners and other interested organisations will help you get wind of upcoming applications. You can also look at the local development plan to see if certain sites are earmarked for retail development. Though there is nothing you can do formally, informally people within planning offices generally know which sites are earmarked for development years in advance.</p> <p>You may be able to find out more by making a Freedom of Information (FOI) request. A guide to FOI requests is available at Friends of the Earth's community website (see Section 7 for further details).</p> |
| <p>A planning application is made</p> | <p>There are two main kinds of application:</p> <ol style="list-style-type: none"> 1) full application – once approved the developer can move directly on-site 2) outline application – a redline boundary around land to be developed. A second application follows approval, but it's rare for the second one to be refused on detailed issues once the outline has gone through. <p>Once the application has been validated by the council, it is recorded on the Planning Register.</p> | <p>The planning register is a public document that you have right to see. It is usually kept at the local authority's main office. You may need to get in contact with the planning department to find out when you can visit.</p> <p>If you don't understand the document, the most important thing to know is that <i>local authorities have a duty to explain the development plan to you</i>. Get in contact with the planning office and ask them to explain it.</p> <p>The process varies according to size, significance etc. Some applications take longer, some require an Environmental Impact</p> |

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| <p>A planning application is made</p> | <p>Local authorities are also required to publicise planning applications by a site notice or advert in a local newspaper.</p> <p>In general, deadline for comments in responding to a planning application are:</p> <p>21 days from a date a site notice is put up</p> <p>14 days from the date an ad appears in a local newspaper</p> | <p>Assessment. Some local authorities will facilitate public meetings for major proposals, but some will not. See “A Campaigner’s Guide to Planning Applications” for more details.</p> <p>The main thing to do is <i>put your comments and objections to the plan in writing</i>. Be brief and courteous, refer to the development plan, consider the public interest in your comments and get your comments in on time if at all possible. You can submit representations after the 21-day deadline and the local authority is still obliged to consider them, but the earlier your concerns are fed into the process, the more likely they are to be taken seriously.</p> |
| <p>Planning officer weighs up the evidence and writes a report</p> | <p>The planning officer’s report should fairly summarise the case for and against the application. It finishes with a recommendation to refuse or approve it, which should be a reasoned judgement based on the facts of the case.</p> | <p>Meet the local planning officer during the consultation period to explain your concerns.</p> |
| <p>The elected planning committee votes on the planning decision</p> | <p>The final decision on whether a major planning application is refused or approved is made by a group of councillors who sit on the planning committee.</p> <p>The planning committee must consider all relevant information – anything which is relates to the use and development of the land. The most important issue they consider is <i>what the local development plan says</i>.</p> <p>For more information see the briefing “A Campaigners Guide to Planning Applications”</p> | <p>The council’s committee report is normally published seven days before the vote. Ask for it.</p> <p>Meet with local councillors. The local council will be able to tell you which committee will look at the application.</p> <p>Arrange to speak at the planning committee meeting to present your concerns. Most authorities allow this, but it is increasingly common to have to book a three-minute “slot.”</p> |

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| <p>Some applications have to be referred to the Secretary of State</p> | <p>Local authorities that wish to approve applications for shopping development in excess of 20,000 square metres of floorspace, or extensions to existing developments which would bring the total floorspace to over 20,000 square metres, must refer the application to the First Secretary of State.</p> <p>Some applications are also referred to the Secretary of State on defined criteria.</p> | <p>Local campaigners can ask for an application to be “called in” by writing to Secretary of State on defined criteria (for further information see the link to the website of the Office of the Deputy Prime Minister (ODPM) in Section 7).</p> |
| <p>If you win</p> | <p>Even if the planning committee rejects the application, supermarkets have the right to appeal the decision. They have six months to apply to the ODPM, which may appoint an independent inspector to look into the case.</p> | <p>If the supermarket appeals on a big application, then a public inquiry will be held. Smaller applications may be dealt with by written representations. Whichever applies, provided you are already involved you have a right to be a part of the process. See “A Campaigners Guide to Planning Applications” for further details.</p> |
| <p>If they win</p> | <p>As the law stands at the moment, objectors have no right of appeal.</p> | <p>There is still a lot you can do. In special circumstances, you can apply for a Judicial Review. You can keep an eye on the development to make sure that the supermarket adheres to the planning rules in building the development – and that if they have made any promises to the local council, the promises are delivered on.</p> <p>Perhaps most importantly, you can develop a campaign to support your local shops. See Section 7 for more advice and useful links.</p> |

3. Top Tips

But whatever stage a planning application has got to, the basic rules remain the same...

Fighting the planning case and running a campaign against a new supermarket application can be a challenge, but there are five big principles to keep in mind:

Advance intelligence

In order to mount the best planning case you need to make sure you know about an application early. You can find out about applications by:

- Checking the council website (if they have one)
- Looking out for site notices
- Checking the local press
- Talking to local councillors and landowners
- Getting on a circulation list of new applications (some councils will charge for this)

Building good relationships

It pays to be on good terms with your local planners. Always try to meet planning officers face to face to make them aware of your concerns. They will also be able to explain local policies to you. It is also worth building links with business, such as smaller shops and trade organisations in your community. Don't assume that the community will automatically support your campaign.

Good communications

Make sure you've got a clear message for the media and public about the negative impacts the store will have. People may love supermarkets but surveys have shown that people don't want to lose their local shops.

Get them on their weakest points

In complex planning cases it's important to stay focused. Rather than trying to say something about everything, you need to work out the key areas of objection and make them into killer arguments. In most retail applications these will be traffic impact and the impact on the vitality and viability of existing town centres.

Danger points

Look out for the applicant's killer response. They will employ a PR firm and will sell the messages of new jobs and other benefits. Watch out for the supermarket offering the council anything from new roads to football stadiums as an enticement for approving the planning application (known as "planning gain" and entirely legal). Prepare your counter-attack, get information about jobs that may be lost in local shops, make the case that the 'improvements' will not justify the negative impacts.

4. Key planning documents – what you need to know

What are the basics?

The most important documents when you are running a local campaign are the development plans produced by your local authority. These plans give the guidance by which the councils decide whether to allow or refuse a planning application.

The production of the plans is influenced by a whole host of different factors – European directives, national planning policy, other government influences such as Ministerial statements, and regional plans and guidance.

Government planning policy

Government planning guidance is set out in a series of planning policy statements (PPSs). These are produced by the Office of the Deputy Prime Minister. The most important PPS for retail planning is PPS6.

Regional planning

Every regional planning body is required to develop a vision for their region, known as a Regional Spatial Strategy (RSS). RSS's are blueprints for a region with a 15 year horizon, revised every five years. Friends of the Earth is heavily involved in campaigning on regional planning, and working to ensure that the new RSS's deliver a vision of sustainable development. See Section 7 for further details.

Local Development Frameworks

The regional tier in turn influences local development plans – which used to be known as structure plans, local plans and unitary development plans. Under new legislation introduced at the end of 2004, structure plans were abolished and unitary and district local authorities are now required to write new plans called Local Development Frameworks.

What a complicated set up....

Yes, in 2004 the government changed a system that, whilst not perfect was at least understandable, into a system that even the local authorities struggle to understand!

So what do I really need to know?

The most important document to get to know is your local authority development plan because it sets the context in which all the development in your area happens. But you also need to make friends with PPS6 – the planning guidance that is the local campaigner's ally.

5. PPS6 – your source for killer arguments

Why do I need to know about PPS6?

When lodging an objection to a planning application, you can write a letter to a local authority from a personal point of view:

e.g. *“I buy all my food from the local shops in Anytown and I am extremely concerned that if a supermarket is built out of town all my local shops will go out of business....”*

or alternatively from a more “objective” viewpoint, using national, regional and local planning guidance to show how the construction of the supermarket will contravene their very own rules.

e.g. *“National planning guidance PPS6 states that “to deliver the Government’s objective of promoting vital and viable town centres, development should be focused in existing centres in order to strengthen and, where appropriate, regenerate them.” By approving construction of an out of town supermarket Anytown local authority will be directly contravening this guidance and threatening the vitality and viability of Anytown town centre...”*

You should try and relate your grounds of your objection as much as possible to national guidance - as it makes for a more powerful argument to local planners and politicians who care about sticking to the rules! Knowing a bit about PPS6 can help you do this.

What is PPS6?

Planning Policy Statement 6 (PPS6) was introduced by the Conservative government in 1996 in an attempt to reverse the decline in town centres caused by out of town development. It has had some success and introduces some extremely useful concepts. In using PPS6, however, you must be aware of one fact – it is not all good! You should expect supermarket lobbyists to hit back with the bits of planning guidance that suit their purposes. The key trick, however, is to know about those bits of the PPS6 that can help your argument, and to make sure your local councillors and planners know about them too...

Principles introduced by PPS6

A) The sequential approach

The sequential approach requires planning applicants which are intending to develop out-of-town to demonstrate that their supermarket, housing or leisure facility could not be built in the town centre instead. The developer is required to show sequentially first that the development could not be in-town, then edge-of-town, and finally out-of-town. The sequential approach is the strongest tool in the PPS6 arsenal as it has to be applied – the local authority cannot ignore it.

PPS6 states that:

A sequential approach should be applied in selecting appropriate sites for allocation within the centres where identified need is to be met. All options in the centre (including, where necessary, the extension of the centre) should be thoroughly assessed before less central sites are considered for development for main town centre uses.

PPS6, Paragraph 2.43

B) Protection of the vitality and viability of town centres

In addition to the sequential approach, PPS6 seeks to protect the vitality and viability of town centres (particularly of market towns and villages) which may be at risk from multiple retailer development.

PPS6 states that:

Local planning authorities should adopt policies that recognise this role and support development which enhances the vitality and viability of market towns and other rural service centres. Local planning authorities should be aware of the extent of the rural population which is dependent on a particular centre or facility, such as a village shop, and seek to protect existing facilities and promote new ones accordingly.

PPS6, Paragraph 2.61

And:

In assessing sites, local planning authorities should consider the impact of the proposal on the vitality and viability of existing centres within the catchment area of the proposed development.

PPS6, Paragraph 3.21

C) Considering the impact on traffic

This is not such a strong tool as the sequential approach as it only requires the local authority to “consider” the impact of traffic rather than actually do anything about it! However, it is still worth knowing about – and it is your job to make sure that the local authority really can show that they have taken this into account in their decision-making. Useful guidance when considering the impact on traffic can also be found in Planning Policy Guidance 13 (PPG13), the planning guidance document which aims to integrate planning and transport policy (see section 7 for further information).

PPS6 states that:

In selecting appropriate sites for allocation, local authorities should have regard to:
i) *whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car; and*
ii) *the impact on car use, traffic and congestion.*

PPS6, Paragraph 2.49

And:

Developments should be accessible by a choice of means of transport, including public transport, walking, cycling and the car (taking full account of customers’ likely travel patterns).

PPS6, Paragraph 3.25

And:

In assessing new developments, local planning authorities should consider:
-whether the proposal would have an impact on the overall distance travelled by car; and
-the effect on local traffic levels and congestion, after public transport and traffic management measures have been secured.

PPS6, Paragraph 3.27

D) Demonstrating the need for a new retail outlet

A supermarket which has not been planned for in the local authority development plan cannot proceed unless the applicant demonstrates that the community needs the development.

PPS6 states that:

Need must be demonstrated for any application for a main town centre use which would be in an edge-of-centre or out-of-centre location and which is not in accordance with an up-to-date development plan document strategy.

PPS6, Paragraph 3.9

These quotes will hopefully give you a taste of the killer arguments that you can use in opposing a supermarket application. If you want to look at PPS6 in more detail, the full text is available on the ODPM website (full details in Section 7).

6. And...what to do if they win

As the law stands at the moment, objectors have no right of appeal. In some limited circumstances, it may be possible to use the process of “judicial review” to challenge unfair decisions through the courts. This route is however potentially costly and complex and you would need specialist advice to proceed with it. More information on where to obtain this is available in Section 7.

But even if this option isn't open to you, that doesn't mean that the argument is necessarily over. For a start, you need to keep an eye on how the development proceeds. In several cases, stores have been designed specifically to allow expansion at some later date (often despite assurances to the contrary) - so you may have to be ready to fight again in the future.

Perhaps most importantly, once the new supermarket has been opened, your local community is going to need your support. There are many examples of communities who have got together with local businesses to reinvigorate their town centres.

Castle Douglas in Scotland has designated itself as a **local food town** – aiming to promote the vibrancy and diversity of the local shops and local food culture.

<http://www.cd-foodtown.org/>

Many communities, for example in **Nottingham** have got local businesses and interested citizens together to produce **local food directories** which list all the outlets available for buying locally produced, healthy and sustainable foods in the area. A list of all the local food directories available in the UK is available at the **local food works** website

<http://www.localfoodworks.org/> .

The '**Tools for Local Economic Renewal**' project at the New Economics Foundation provides workshops and resources to local communities to help them take action to revive their local economies. <http://www.neweconomics.org>

In Louisville, USA, a coalition of independent business owners got together to counter the spread of multiple retailers by starting up the '**Keep Louisville Weird**' campaign. The campaign aimed to raise public awareness and to encourage local consumers to *“just patronize independent, locally owned businesses whenever possible, and encourage others to do the same.”* More information at <http://www.keeplouisvilleweird.com/>

Another example of a good idea is the '**Locavores Campaign**' in San Francisco, which has brought together a group of *“concerned culinary adventurers”* who are making an effort to eat only foods grown or harvested within a 100 mile radius of San Francisco for a month.

<http://www.locavores.com/>

Friends of the Earth is working with communities around the country to promote the alternatives to supermarket shopping. For more information on our work and how you can get involved contact the Friends of the Earth information team on 020 7490 1555 or info@foe.co.uk

7. Further information

The impact of supermarkets

More information on the impacts of supermarkets on communities, the environment and their suppliers is available from the “experts” section of the Real Food pages on the Friends of the Earth website at

http://www.foe.co.uk/campaigns/real_food/resource/experts.html. These include:

Checking out the Environment – Environmental Impacts of Supermarkets - an outline of the environmental impacts of large supermarket chains at the local, national and global scale.

The Tesco Takeover - this briefing reveals the price for farmers, workers, town centres and the environment of Tesco’s massive expansion over the past 10 years.

Good Neighbours: Community Impacts of Supermarkets - this briefing looks at the economic and social effects of the competitive policies of large supermarket chains, and the subsequent impacts on local communities in the UK.

How the planning system works

More information on how to engage with the local planning system is available in the resource section of the Friends of the Earth planning website at

<http://www.yourplanningrights.co.uk>

A Campaigner’s Guide to Planning Applications – further information on the details of the planning system at the Local Authority level and how to engage with planning applications.

The New English Planning System: an Overview – how the planning system is changing over the next few months.

A Local Campaigner’s Guide to the New English Planning System – more information on the key elements Friends of the Earth recommends for inclusion in the new Local Development Frameworks.

Your Right to Challenge: Judicial Review – includes detailed information on when and how you can seek a Judicial Review for a planning decision.

Supermarkets and the new English planning system

Local Development Frameworks and Your Community: Retail Policy – how to influence your new community development plans.

Available at http://www.foe.co.uk/campaigns/real_food/resource/experts.html

Freedom of Information

More information on how to make a Freedom of Information request is available from the Friends of the Earth “community” site at: <http://www.righttoknow.co.uk>

Government documents

PPS 6: The full text of PPS6 is available from the ODPM website at: http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_036805.pdf

PPG 13: The full text of PPG 13 is available from the ODPM website at: <http://www.odpm.gov.uk/index.asp?id=1144015>

Call-ins: Further information on the criteria by which the Secretary of State will call in an application is available from: http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_606802-05.hcsp (click “Next” to go to Annex 5)

Other groups which can help you

Corporate Watch has recently produced a new version of the briefing *Checkout Chuckout*, which provides further advice on running local campaigns. The briefing is downloadable from their website at <http://www.corporatewatch.org.uk/?lid=1916>

The **New Economics Foundation** <http://www.neweconomics.org> has produced a series of “tools for local economic renewal,” which aim to equip communities with the tools needed to create a truly local economy. Its clone town/ ghost town Britain reports are also a key resource for startling facts on the impacts of the multiple retailers on local economies.

The Council for the Protection of Rural England (CPRE) has a useful site with lots of advice on responding to planning applications at <http://www.planninghelp.org.uk/>.

The **Planning Portal** is the UK Government's planning resource. This site is a good resource to learn about the planning system, apply for planning permission, find out about development near you, appeal against a planning decision and research the latest government policy. It is at <http://www.planningportal.gov.uk/>

Planning Aid provides free, independent and professional advice and support on planning issues to people and communities who cannot afford to hire a planning consultant. Planning Aid complements the work of local authorities but is wholly independent of them. <http://www.planningaid.rtpi.org.uk/>

The **Environmental Law Foundation** can provide more specialist help if you are seeking a Judicial Review. <http://www.elflaw.org/>

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- ⁱⁱⁱ A survey in August 2005 showed that Tesco had 30.7% of the grocery market. Reported in The Grocer. August 27 2005.
- ^{iv} According to ODPM figures, in 2003, 73.4% of new retail space was built outside town centres. 60.5% was built neither in in-town locations or locations within a 300 metre buffer zones of the town centre. ODPM. July 2005. *Technical report: using town centre statistics to indicate the broad location of retail development – initial analysis*.
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- ^{vi} *Ghost Town Britain II: Death on the High Street*,
<http://www.neweconomics.org/gen/uploads/2hk0dtqtzv0run55afsofu4515122003114309.pdf>
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