

# Anticipated acquisition by LKQ Corporation of Uni-Select Inc.

## Decision on relevant merger situation and substantial lessening of competition

**ME/7039/23**

The CMA's decision on reference under section 33(1) of the Enterprise Act 2002 given on 21 July 2023. Full text of the decision published on 18 August 2023.

Please note that [X] indicates figures or text which have been deleted or replaced in ranges at the request of the parties or third parties for reasons of commercial confidentiality.

### 1. SUMMARY

1. The Competition and Markets Authority (**CMA**) has found that LKQ Corporation (**LKQ**)'s anticipated acquisition of Uni-Select Inc. (**Uni-Select**) (**the Merger**) gives rise to a realistic prospect of a substantial lessening of competition (**SLC**) in certain markets within the UK. LKQ and Uni-Select are together referred to as the **Parties**.
2. In the UK, the Parties overlap in the supply of car parts and related garage equipment through physical stores and online channels. LKQ, through Euro Car Parts Limited (**ECP**), operates 248 stores and two distribution sites in the UK, while Uni-Select, through GSF Car Parts (**GSF**), operates 179 stores and two distribution sites in the UK.
3. The Parties primarily supply car parts to the independent motor trade (**IMT**), which includes independent (or franchised) garages, workshops, car dealers and fast-fit centres that purchase car parts to repair and service vehicles. The Parties have both local and national or multi-regional IMT customers:
  - (a) The majority of IMT customers are local customers that operate one site or a small network of sites within a single local area or region.
  - (b) Some IMT customers, such as national garage chains, vehicle fleets associated with county councils or the emergency services, or specialist and

commercial fleets (collectively, known as **Key Account** customers) are active on a national or multi-regional basis. These customers select suppliers centrally, based on a range of requirements not limited to locality.

4. In addition to supplying car parts to the IMT, the Parties also supply car parts to local retail customers and supply garage equipment (products used by garages for the repair and maintenance of vehicles) to local IMT customers.
5. The CMA assessed the impact of the Merger in the supply of car parts to Key Account customers nationally, to local IMT customers and to local retail customers (each in local catchment areas). The CMA also assessed the supply of garage equipment to local IMT customers (in local catchment areas).
6. The Parties submitted that they believed that the CMA's test for reference was met on the basis that the Merger would give rise to a realistic prospect of an SLC arising from horizontal unilateral effects in:
  - (a) the supply of car parts to Key Account customers nationally,
  - (b) the supply of car parts to local IMT customers in 145 of 172 local overlapping areas,
  - (c) the supply of car parts to retail customers in all 172 local overlapping areas, and
  - (d) in the supply of garage equipment to local IMT customers in 145 of 172 local overlapping areas.
7. The Parties therefore waived their rights in relation to certain procedural steps, including their right to receive and respond to an issues letter setting out the case for reference and attend an issues meeting, and requested that the case be fast tracked to the consideration of undertakings in lieu of a reference (**UILs**). In light of the Parties' concession that the test for reference is met, and the evidence available to the CMA indicating that the Parties are two of only a small number of suppliers in each of the relevant markets and are significant and close competitors, the CMA found that the Merger gives rise to a realistic prospect of an SLC as a result of horizontal unilateral effects in each of the markets referred to in paragraph 6 above.
8. The CMA is therefore considering whether to accept undertakings under section 73 of the Enterprise Act 2002 (**the Act**). The Parties have until 28 July 2023 to offer an undertaking to the CMA that might be accepted by the CMA. If no such undertaking

is offered, then the CMA will refer the Merger pursuant to sections 33(1) and 34ZA(2) of the Act.

# ASSESSMENT

## 2. PARTIES

9. LKQ is a US-headquartered company, listed on the NASDAQ stock exchange. LKQ is a general motor factor,<sup>1</sup> primarily active in the distribution of vehicle products, including replacement parts, components and systems used in the repair and maintenance of vehicles, specialty products and accessories.<sup>2</sup> In the UK, LKQ operates through ECP, a distributor of car, light commercial vehicle and speciality parts, and garage equipment.<sup>3</sup> The turnover of LKQ in 2022 was approximately £10.3 billion worldwide and approximately £1.3 billion in the UK.<sup>4</sup>
10. Uni-Select is a Canadian-headquartered company listed on the Toronto Stock Exchange.<sup>5</sup> Uni-Select is a general motor factor, primarily active in the distribution of automotive refinish and industrial paint and related products in North America and in the distribution of car and light commercial vehicle parts and related parts in Canada and, via its subsidiary GSF, the UK.<sup>6</sup> In the UK, Uni-Select also distributes garage equipment. The turnover of Uni-Select in 2022 was approximately £1.4 billion worldwide and approximately £330 million in the UK.<sup>7</sup>

## 3. TRANSACTION

11. LKQ entered into an agreement with Uni-Select to acquire all of Uni-Select's issued and outstanding shares on 26 February 2023 for a total enterprise value of approximately C\$2.8 billion (US\$2.1 billion).<sup>8</sup>
12. The Parties informed the CMA that the Merger was also conditional upon antitrust clearances from competition authorities in the United States of America and Canada (which have been received as at the date of this Decision).<sup>9</sup>

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<sup>1</sup> 'General motor factor' refers to a business active in the supply of a broad range of car parts primarily to the IMT, ie independent garages, workshops, car dealers or fast-fit centres to repair and service vehicles (see further paragraphs 25 to 32).

<sup>2</sup> Final Merger Notice submitted to the CMA on 9 June 2023 (FMN), paragraph 3.1.

<sup>3</sup> FMN, paragraph 3.3

<sup>4</sup> FMN, paragraph 6.1.

<sup>5</sup> FMN, paragraph 3.5.

<sup>6</sup> FMN, paragraph 3.6

<sup>7</sup> FMN, paragraph 6.1.

<sup>8</sup> FMN, paragraph 2.1.

<sup>9</sup> FMN, paragraph 2.2.

13. LKQ's stated rationale for the Merger is to [X].<sup>10</sup>

#### 4. PROCEDURE

14. The CMA commenced its Phase 1 investigation on 16 June 2023.

15. On 14 June 2023, the Parties informed the CMA that they believed that the Merger gives rise to a realistic prospect of an SLC arising from horizontal unilateral effects in the supply of:<sup>11</sup>

(a) car parts<sup>12</sup> to (i) Key Account customers nationally, (ii) local IMT customers in 145 (out of 172) local overlapping areas, and (iii) local retail customers in all 172 overlapping areas; and

(b) garage equipment to local IMT customers in 145 (out of 172) local overlapping areas.

16. As set out in the CMA's guidance, merger parties can waive their rights in relation to certain procedural steps within a merger investigation to enable a binding outcome to be arrived at more quickly.<sup>13</sup> The Parties requested that the case proceed directly to the consideration of UILs. As part of the request, the Parties agreed to waive their procedural rights to challenge the position that the test for a reference is met during the CMA's Phase 1 investigation, including their right to receive and respond to an issues letter setting out the case for reference and attend an issues meeting.

17. In agreeing to fast-track the case to the consideration of UILs, the CMA has, in keeping with the process set out in its guidance, had regard to the efficient conduct of the investigation and decided that it was appropriate to proceed with an accelerated Phase 1 timetable.

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<sup>10</sup> FMN, paragraph 2.3.

<sup>11</sup> Email from Slaughter and May (on behalf of LKQ) to CMA on 14 June 2023 at 1:48 PM; Email from Linklaters LLP (on behalf of Uni-Select) to CMA on 14 June, 2023 at 2:12 PM.

<sup>12</sup> Throughout this decision, references to car parts also refer to parts for other light commercial vehicles.

<sup>13</sup> [Mergers: Guidance on the CMA's jurisdiction and procedure \(CMA2\)](#), January 2021 (revised January 2022), paragraphs 7.1 and 7.8-7.13.

## 5. JURISDICTION

18. A relevant merger situation exists where two or more enterprises have ceased to be distinct and either the turnover or the share of supply test is met.<sup>14</sup>
19. Each of LKQ and Uni-Select is an enterprise within the meaning of section 129 of the Act. As a result of the Merger, LKQ will acquire the entire issued share capital of Uni-Select. Accordingly, LKQ and Uni-Select will cease to be distinct for the purposes of sections 23(1)(a) and 26 of the Act.
20. The UK turnover of Uni-Select exceeds £70 million, so the turnover test in section 23(1)(b) of the Act is satisfied.
21. The CMA therefore believes that it is or may be the case that arrangements are in progress or in contemplation which, if carried into effect, will result in the creation of a relevant merger situation.
22. The initial period for consideration of the Merger under section 34ZA(3) of the Act started on 16 June 2023 and the statutory 40 working day deadline for a decision is therefore 10 August 2023.

## 6. COUNTERFACTUAL

23. The CMA assesses a merger's impact relative to the situation that would prevail absent the merger (ie the counterfactual). For anticipated mergers the CMA generally adopts the prevailing conditions of competition as the counterfactual against which to assess the impact of the merger. The counterfactual may consist of the pre-merger conditions of competition, or conditions of competition that involve stronger or weaker competition between the merger firms than under the pre-merger conditions of competition.<sup>15</sup>
24. In this case, the CMA has not received any evidence supporting a different counterfactual, and the Parties have not put forward arguments in this respect. Therefore, the CMA has considered the Merger against a counterfactual of the prevailing conditions of competition.

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<sup>14</sup> [Mergers: Guidance on the CMA's Jurisdiction and Procedure \(CMA2\)](#), chapter 4; section 23 of the Act.

<sup>15</sup> [Merger Assessment Guidelines \(CMA129\)](#), paragraph 3.2

## 7. INDUSTRY BACKGROUND

### Supply of car parts to the IMT

25. The Parties are both general motor factors supplying a wide range of car parts primarily to the IMT (ie independent garages, workshops, car dealers or fast-fit centres to repair and service vehicles).
26. General motor factors primarily supply independent aftermarket (**IAM**) car parts to the IMT, which are replacement parts used to repair or service vehicles that are not specific to one individual marque.<sup>16</sup> They are not approved by vehicle original equipment manufacturers (**OEMs**) and therefore are not branded as OEM parts.
27. Some general motor factors (including both the Parties) also sell OEM car parts and private-label car parts. OEM car parts are approved and branded by the OEM and also supplied by OEMs directly or via their dealer networks (either OEM-owned or franchised dealers).<sup>17</sup> Private label car parts are manufactured by a third party but designed and/or branded by the motor factor.
28. In addition to general motor factors, there are a number of motor factors that specialise in the supply of a particular set of car parts, such as exhausts, brakes or clutches. Specialist motor factors tend to be locally based, with limited distribution networks.<sup>18</sup>
29. IMT customers are primarily relatively small customers operating from one or a small number of sites in a local area.<sup>19</sup> Some IMT customers, however, operate on a national or multi-regional basis, including national garage chains, vehicle fleets associated with County Councils or the emergency services, or specialist and commercial fleets. Such IMT customers are collectively known as Key Account customers.<sup>20</sup>
30. While independent customers normally have trade accounts with several general motor factors, Key Account customers often tender for or directly negotiate with a primary supplier who can supply them across a wide geographic area and, on occasion, a secondary supplier. Key Account customers typically require suppliers to have a broad geographic coverage in order to be able to deliver car parts quickly

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<sup>16</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 3.3.

<sup>17</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 3.4.

<sup>18</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 3.17.

<sup>19</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 3.10.

<sup>20</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 3.10.

to all their sites, usually requiring central administration with a single price across all areas.<sup>21</sup>

## **Supply of car parts to retail customers**

31. In addition to supplying the IMT, the Parties supply car parts to retail customers through their local stores and/or e-commerce platforms/websites. Retail customers typically purchase car parts on an ad-hoc basis for do-it-yourself car repairs.<sup>22</sup>

## **Garage equipment**

32. General motor factors typically supply garage equipment to the IMT. Garage equipment covers a broad range of products used by garages in the repair and maintenance of customers' vehicles.<sup>23</sup>

## **8. FRAME OF REFERENCE**

33. Market definition provides a framework for assessing the competitive effects of a merger and involves an element of judgement. The boundaries of the market do not determine the outcome of the analysis of the competitive effects of the merger, as it is recognised that there can be constraints on merging parties from outside the relevant market, segmentation within the relevant market, or other ways in which some constraints are more important than others. The CMA will take these factors into account in its competitive assessment.<sup>24</sup>

34. The Parties overlap in the supply of car parts and garage equipment in the UK.<sup>25</sup>

## **Product scope**

### ***Car parts supplied by general motor factors vs OEM and specialist suppliers***

35. In its phase 2 investigation in *ECP/Andrew Page*, the CMA found that car parts supplied by general motor factors should not be included in the same product market as car parts supplied by OEM and specialist suppliers.<sup>26</sup> The CMA found that OEM and specialist suppliers typically only supply a limited range of products, did

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<sup>21</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 3.11.

<sup>22</sup> Note of a call with a third party, 9 June 2022.

<sup>23</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 3.30.

<sup>24</sup> [CMA129](#), paragraph 9.4.

<sup>25</sup> FMN, paragraph 12.1 and Table 12.1.

<sup>26</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 5.39.



not price as competitively as general motor factors, and did not offer multiple types of parts at different price-points.<sup>27</sup> In addition, the majority of third parties responding to the CMA's investigation reported that they valued speed of delivery, but told the CMA that OEM and specialist suppliers delivered less frequently than general motor factors.<sup>28</sup>

36. The Parties submitted that market developments since the CMA's *ECP/Andrew Page* investigation support widening the product market to include OEM and specialist suppliers. According to the Parties:<sup>29</sup>
- (a) OEM dealers (including Stellantis, TrustFord, and TPS) have been actively targeting the aftermarket due to the decline in the volume of new car sales in the UK;
  - (b) due to [redacted], ECP now also supplies OEM car parts at a local and national level in the UK; and
  - (c) some of the Parties' general motor factor competitors are also understood to be supplying OEM car parts in the UK.
37. That said, the Parties acknowledged that OEM suppliers face challenges in establishing their brand identity and achieving the relevant geographic coverage to supply IMT customers.<sup>30</sup> The Parties also noted they have [redacted]. Furthermore, the Parties did not make any specific submissions to evidence why specialist car part suppliers should be included in the product frame of reference. In light of these issues, and the limited data availability in particular, the Parties accepted that the CMA has sufficient evidence to apply the same product market definition (ie excluding OEM and specialist suppliers) as applied in *ECP/Andrew Page*.<sup>31</sup>
38. The Parties' internal documents generally do not support the inclusion of OEM or specialist suppliers. While several of the Parties' internal documents reference increasing threats/constraints from OEM suppliers, both Parties' documents indicate that they monitor rival motor factors considerably more frequently and closely.<sup>32</sup>

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<sup>27</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 5.29.

<sup>28</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 5.30.

<sup>29</sup> FMN, paragraph 13.20-21.

<sup>30</sup> FMN, paragraph 13.22.

<sup>31</sup> FMN, paragraphs 13.22 and 13.23.

<sup>32</sup> For example, references to OEM constraints include: LKQ Internal Document, Annex 008.2 to the FMN, [redacted]; Annex 08.8 to the FMN, [redacted]. For references to motor factors: LKQ Internal Document, Annex 008.4 to

39. In view of the above, the CMA considers that the product frame of reference encompasses car parts supplied by general motor factors, excluding OEM and specialist suppliers.<sup>33</sup>

### **Segmentation by customer**

#### *Local IMT customers and Key Account customers*

40. In *ECP/Andrew Page*, the CMA segmented the product market between the supply of car parts to local IMT customers and Key Account customers. The CMA found that Key Account customers have multiple sites and typically preferred buying from one supplier that could provide a range of car parts to the majority of their sites, and therefore a sufficiently broad geographic coverage was needed for suppliers competing to be a Key Account customer's primary supplier.<sup>34</sup>
41. The Parties submitted that the same customer segmentation adopted in *ECP/Andrew Page* should be adopted in this case.<sup>35</sup>
42. The CMA has not received evidence to support departing from this approach and therefore has adopted the same segmentation between local IMT customers and Key Account customers for the purposes of this investigation.

#### *Retail customers*

43. Information provided by the Parties indicated that retail customers constitute a separate customer segment from IMT customers. Retail customers do not have trade accounts, they typically buy car parts on an *ad hoc* basis to complete a do-it-yourself repair,<sup>36</sup> and purchase car parts either in local stores (including via online

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the FMN, [redacted]; Annex 008.42 to the FMN, [redacted]; Annex 008.46 to the FMN, [redacted]; Annex 008.57 to the FMN, [redacted]; Annex 008.65 to the FMN, [redacted] Annex 008.6 to the FMN, [redacted]; Uni-Select Internal Document, Annex 010.10 to the FMN, [redacted]; Annex 010.11 to the FMN, [redacted]; Annex 010.12 to the FMN, [redacted].

<sup>33</sup> In its phase 2 investigation in *ECP/Andrew Page*, the CMA also limited the product market definition to IAM car parts supplied by general motor factors, excluding OEM and private label car parts, even if supplied by general motor factors. In relation to private label car parts, this was in part due to the fact there was no material overlap between the Parties given that Andrew Page had minimal activities in that space ([ECP / Andrew Page \(2017\) – Final Report](#), paragraph 3.33). In this case, however, both the Parties supply IAM, OEM and private label car parts. The CMA also understands, based on the available evidence, that competitive conditions for the supply of all three types of car parts by general motor factors do not differ significantly (FMN, paragraphs 13.13 and 13.21). For the purposes of this decision, therefore, the CMA has included all three types of car parts supplied by general motor factors in the product market definition.

<sup>34</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 5.40-5.47.

<sup>35</sup> FMN, paragraphs 13.24 – 13.26.

<sup>36</sup> Notes of calls with third parties, 8 June 2023 and 9 June 2023.

click-and-collect services) or online for home delivery.<sup>37</sup> The Parties submitted that the range of competitors active in the supply of car parts to retail customers differs from IMT customers. In particular, while both of the Parties operate retail businesses, the Parties submitted that other motor factors such as Alliance Automotive Group (**AAG**), Motor Parts Direct (**MPD**) and the Rapid Group do not, although they may supply a limited range of retail products as add-ons to their IMT offering.<sup>38</sup>

44. In view of the above, the CMA therefore treated the supply of car parts to retail customers as a separate product market.

### **Garage equipment**

45. The Parties submitted that the competitive conditions for the supply of garage equipment are similar to those for the supply of car parts to IMT customers. According to the Parties, the Parties and their main general motor factor competitors supply both types of products from the same branches; IMT customers often source both car parts and garage equipment from motor factors; and, as for car parts, suppliers of garage equipment also compete on price, quality, product range, and delivery times.<sup>39</sup>
46. Evidence received by the CMA supports that the competitive conditions between the supply of garage equipment and car parts to IMT customers may be similar.<sup>40</sup> Nevertheless, given the existence of some demand- and supply-side differences between the supply of both types of products (in particular, the products themselves are functionally different),<sup>41</sup> on a cautious basis the CMA has defined the supply of garage equipment to IMT customers as a separate product market. Furthermore, as the Parties are focused on the supply of garage equipment to local (rather than Key

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<sup>37</sup> The supply of car parts to retail customers was not considered in *ECP/Andrew Page* because Andrew Page's activities were minimal in this area ([ECP / Andrew Page \(2017\) – Final Report](#), paragraph 3.33).

<sup>38</sup> FMN, paragraph 13.29 and footnote 46. Retail customers can also purchase car parts from online platforms, such as Amazon, Autodoc, and eBay, that supply car parts to retail customers but typically not the IMT. However, these e-commerce sites operate on a national basis and do not typically compete with the Parties for local retail sales. See paragraph 53 and footnote 50 for the CMA's definition of the geographic frame of reference for local retail.

<sup>39</sup> FMN, paragraphs 13.16 and 13.32.

<sup>40</sup> Response to the CMA questionnaire from a third party, June 2023, questions 3 and 5.

<sup>41</sup> See also ME/6647/16 [ECP / Andrew Page \(2017\) – Phase 1 Decision](#), footnote 19.

Account) IMT customers, the CMA has also limited the product market to this customer segment.<sup>42</sup>

### **Conclusion on product frame of reference**

47. For the reasons set out above, the CMA has considered the impact of the Merger in the supply of:
- (a) car parts to Key Account customers;
  - (b) car parts to local IMT customers;
  - (c) car parts to retail customers; and
  - (d) garage equipment to local IMT customers.

### **Geographic scope**

#### **Supply of car parts to Key Account customers**

48. In *ECP/Andrew Page*, the CMA concluded that the geographic market for the supply of car parts to Key Account customers is national.<sup>43</sup> As noted above, the CMA found in that case that Key Account customers have multiple sites and typically preferred buying from one supplier that could provide a range of car parts to the majority of their sites. This was also supported by ECP's depot-level sales data, which indicated that large national Key Accounts typically bought parts from a wide range of ECP's depots.<sup>44</sup>
49. The Parties submitted that the geographic market definition adopted in *ECP/Andrew Page* should also apply in this case.<sup>45</sup> The evidence the CMA has received supports

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<sup>42</sup>The CMA has not considered the supply of garage equipment to Key Account customers further in this Decision given the Parties' limited sales in this segment and the CMA understands that such customers typically approach manufacturers/importers of garage equipment directly to achieve the most beneficial commercial terms (FMN, paragraph 15.50). Similarly, the CMA has not considered further the supply of garage equipment to retail customers, given the Parties' limited sales to such customers (FMN, paragraph 15.49).

<sup>43</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 5.60.

<sup>44</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraphs 5.56 to 5.59.

<sup>45</sup> FMN, paragraph 13.6.(ii).

the approach in *ECP/Andrew Page*,<sup>46</sup> and therefore the CMA has similarly defined the geographic market as national.

### **Supply of car parts to local IMT customers**

50. In *ECP/Andrew Page*, the CMA concluded that the relevant geographic market for the supply of car parts to local IMT customers was local to each of the parties' sites. The CMA found that prices vary on a local basis in response to local competitive conditions, including the number of competing motor factors present, speed of delivery, and product range.<sup>47</sup>

51. The Parties submitted that the geographic market definition adopted in *ECP/Andrew Page* should also apply in this case.<sup>48</sup> The CMA has not received evidence to support departing from the approach in *ECP/Andrew Page*, and therefore has similarly defined the geographic market as local to each of the Parties' sites. The precise size of the relevant local markets is discussed further at paragraphs 77 to 92 below.

### **Supply of car parts to retail customers**

52. The Parties submitted that the geographic market for the supply of car parts to retail customers is local.<sup>49</sup> According to the Parties, the [X] of their retail sales are made to customers from their local sites. Walk-in and click-and-collect represented [X]% and [X]% of GSF and ECP retail sales (by revenue) respectively in 2022, with the remainder being home delivery sales. The [X] of home delivery sales are made from local stores, with a [X] proportion of total sales made from centralised depots.<sup>50</sup>

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<sup>46</sup> For example, two Key Account customers responding to the CMA's investigation noted geographic coverage as important for a Key Accounts supplier (Responses to customer questionnaire, June 2023, questions 3, 5, and 6).

<sup>47</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraphs 5.48 and 5.49.

<sup>48</sup> FMN, paragraphs 13.6.(i) and 15.27.

<sup>49</sup> FMN, paragraphs 13.39(i).

<sup>50</sup> FMN, paragraphs 15.63-15.65; and Parties' response to RFI5, 27 June 2023, pages 5 and 6. The Parties submitted that only [X]% of their combined retail sales, including home deliveries, are from centralised depots. This is because some of their home deliveries are made from local stores.

53. In view of the above, the CMA has defined the geographic market for the supply of car parts to retail customers as local to each of the Parties' sites.<sup>51</sup> The precise size of the relevant local markets is discussed at paragraphs 93 to 102 below.

### ***Supply of garage equipment to local IMT customers***

54. The Parties submitted that the geographic market for the supply of garage equipment to local IMT customers is local.<sup>52</sup> According to the Parties, and as noted above, the Parties are focused on the supply of garage equipment to local IMT customers. The Parties also submitted that similar conditions of competition apply as in the case of car parts to local IMT customers.

55. In view of the above, the CMA has defined the geographic market as local to each of the Parties' sites. The precise size of the relevant local markets is discussed further at paragraphs 103 to 109 below.

### **Conclusion on frame of reference**

56. For the reasons set out above, the CMA has considered the impact of the Merger in the following frames of reference:

- (a) the supply of car parts to Key Account customers nationally;
- (b) the supply of car parts to local IMT customers, local to each of the Parties' sites;
- (c) the supply of car parts to local retail customers, local to each of the Parties' sites; and
- (d) the supply of garage equipment to local IMT customers, local to each of the Parties' sites.

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<sup>51</sup> The CMA notes that the Parties also sell car parts to retail customers via national web/e-commerce sites and that a number of parameters of competition are set nationally, which indicates that the Parties may also compete in a wider national retail market (FMN, paragraph 15.35). However, the CMA has not separately considered the impact of the Merger on a national retail market in this Decision as this comprises a small part of their overall business and the Parties accepted that the test for reference is met in relation to all 172 local overlap areas for the supply of car parts to local retail customers, which covers almost the entirety of the Parties' retail businesses (see further paragraphs 93 to 102).

<sup>52</sup> FMN, paragraphs 13.16, 13.39(i) and 15.52.

## 9. COMPETITIVE ASSESSMENT

57. Horizontal unilateral effects may arise when one firm merges with a competitor that previously provided a competitive constraint, allowing the merged firm profitably to raise prices or to degrade quality on its own and without needing to coordinate with its rivals.<sup>53</sup> Horizontal unilateral effects are more likely when the merging parties are close competitors.
58. The CMA assessed whether it is or may be the case that the Merger may be expected to result in an SLC in relation to horizontal unilateral effects in each of the frames of reference referred to in paragraph 56 above.

### **Horizontal unilateral effects in the supply of car parts to Key Accounts nationally**

59. As part of its assessment of the national market for the supply of car parts to Key Accounts, the CMA has considered:
- (a) the closeness of competition between the Parties; and
  - (b) the nature and extent of constraints from alternative suppliers.

#### ***Closeness of competition***

60. The Parties submitted that LKQ and GSF are close competitors for the supply of car parts to Key Accounts nationally. LKQ indicated that it considers ECP and GSF to be the two largest suppliers in the UK. ECP supplies car parts to more than [X] Key Accounts and is the primary supplier for [X], while GSF supplies [X] Key Accounts and is the primary supplier for [X] these customers.<sup>54</sup>
61. The Parties were unable to provide share estimates due to data limitations.<sup>55</sup> Instead, the Parties provided tender data, which showed that in the past three years the Parties have collectively participated in [X] Key Accounts tenders winning [X]

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<sup>53</sup> [CMA129](#), paragraph 4.1.

<sup>54</sup> FMN, paragraphs 15.4-15.5 and 15.7.

<sup>55</sup> The Parties stated that they were not aware of any data sources that provide a basis on which to estimate the total size of the UK market for car parts (and more particularly, car parts supplied to Key Accounts customers) and could not provide a reliable estimate of the value of a market for the supply of car parts to Key Accounts based on industry knowledge because they did not have any insight into the total revenues generated by customers across different suppliers, or revenues derived from Key Account customers that they do not supply (FMN, paragraph 15.10).

in total, or [X]%.<sup>56</sup> The Parties submitted that this demonstrates they collectively supply a material proportion of Key Accounts.<sup>57</sup>

62. The Parties submitted that they are also close competitors for the following reasons:<sup>58</sup>
- (a) the Parties have similar and strongly competing service propositions for the supply of Key Accounts, competing on price, quality, product range and delivery times;
  - (b) they supply similar Key Accounts and compete head-to-head on [X] of national Key Accounts tenders;
  - (c) they supply a number of common Key Account customers, including [X]. Moreover, [X] of GSF's top ten Key Accounts are also supplied by ECP, and the Parties' common Key Accounts make up [X]% of GSF's Key Accounts;
  - (d) they have recently won and lost customers from one another. For example, GSF won [X] customers from ECP in the last three years via tender processes, namely [X], while ECP has also won customers from GSF such as [X]; and
  - (e) there is a significant overlap in the Parties' geographic locations, with many branches within a few miles of each other.
63. The above submissions align with the CMA's findings in *ECP/Andrew Page*, where the CMA concluded that GSF (then Parts Alliance UK, prior to its acquisition by Uni-Select) was a 'significant competitor' to ECP for Key Account customers nationally.<sup>59</sup>
64. The Parties' internal documents also support that the Parties view each other as close competitors. For example:
- (a) [X];<sup>60</sup>
  - (b) [X];<sup>61</sup> and

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<sup>56</sup> FMN, paragraph 15.13.

<sup>57</sup> FMN, paragraphs 15.11 to 15.13 and Table 15.4.

<sup>58</sup> FMN, paragraphs 15.17-20.

<sup>59</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 8.35.

<sup>60</sup> LKQ Internal Document, Annex 008.16 to the FMN, [X]; Annex 008.18 to the FMN, [X]

<sup>61</sup> LKQ Internal Document, Annex 008.61 to the FMN, [X]; Annex 008.63 to the FMN, [X].



(c) [REDACTED],<sup>62</sup> [REDACTED].

65. In addition, Key Account customers responding to the CMA's investigation indicated that they consider that the Parties are the two strongest Key Account suppliers and compete closely due to their product range and/or geographic coverage.<sup>63</sup>
66. In view of the above, the CMA considers the Parties to be the largest suppliers of car parts to Key Accounts in the UK and each other's closest competitor.

### **Competitive constraints**

67. The Parties identified three other competitors active in the supply of car parts to Key Accounts nationally: Independent Motor Trade Factors Associated (**IFA**), AAG, and MPD.<sup>64</sup>
68. The Parties noted, however, that in *ECP/Andrew Page* the CMA considered that GSF (then Parts Alliance UK) was the only supplier to compete with ECP to a significant extent. In particular, the CMA found in that case that:<sup>65</sup>
- (a) IFA has national coverage but was unlikely to exert more than a marginal constraint on ECP for Key Accounts (outside of its participation in certain joint contracts with GSF),<sup>66</sup> as only one customer told the CMA it had used IFA as a supplier in its own right, and not through its supply partner Parts Alliance (now GSF).<sup>67</sup>
  - (b) MPD was only a marginal constraint on ECP and not able to compete to be the primary supplier even for smaller Key Accounts, because it could not match the pricing and service levels ECP and Andrew Page could offer due to their size and geographical coverage.<sup>68</sup>
  - (c) AAG did not exert any competitive constraint on ECP given only two Key Accounts indicated that they use AAG for some purchases and both rated AAG

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<sup>62</sup> LKQ Internal Document, Annex 008.1 to the FMN, [REDACTED].

<sup>63</sup> Note of a call with a third party, 8 June 2022; Response to the CMA questionnaire from a third party, June 2023, questions 3 and 5; Response to the CMA questionnaire from a third party, June 2023, questions 3 and 6.

<sup>64</sup> Annex 018 to the FMN.

<sup>65</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 8.35 and Appendix 8.2.

<sup>66</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraphs 3.27 and 8.33.

<sup>67</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 8.33 and Appendix 8, paragraphs 11 to 13.

<sup>68</sup> [ECP / Andrew Page \(2017\) – Final Report](#), paragraph 8.33.

lower than ECP and Parts Alliance (now GSF) in terms of competitive strength.<sup>69</sup>

69. The Parties did not present any evidence to indicate that the competitive constraint offered by IFA, AAG or MPD had materially changed since *ECP/Andrew Page*. Key Account customers responding to the CMA's investigation also considered that the Parties remain the strongest competitors in the market.<sup>70</sup>
70. The CMA therefore considers that, post-Merger, no other supplier is likely to exercise a significant competitive constraint on the Parties in the supply of car parts to Key Accounts nationally.

### **Conclusion**

71. In view of the above, the CMA considers that the Merger may be expected to result in a realistic prospect of an SLC in the supply of car parts to Key Accounts in the UK.<sup>71</sup> The Parties accepted that the test for reference is met in respect of this frame of reference.

### **Horizontal unilateral effects in local markets**

#### ***Use of decision rules***

72. The Parties overlap in the supply of (i) car parts to local IMT customers, (ii) car parts to local retail customers, and (iii) garage equipment to local IMT customers, in each case locally to each of the Parties' sites.
73. The CMA considers it is appropriate to use a decision rule approach to assess the impact of the Merger on competition at a local level in each of these frames of reference. This is because, as was found in other recent CMA decisions,<sup>72</sup> a decision rule:

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<sup>69</sup> [ECP / Andrew Page \(2017\) – Final Report](#), Appendix 8, paragraphs 8 to 10.

<sup>70</sup> Response to the CMA questionnaire from third parties, June 2023, question 3.

<sup>71</sup> FMN, paragraph 9.

<sup>72</sup> See, for example, [Medivet Group Limited / multiple independent veterinary businesses merger inquiries](#), May 2023, paragraphs 142 – 147.

- (a) ensures all local areas are assessed systematically and with reference to the same factors, rather than having regard to different factors in different local areas;<sup>73</sup>
- (b) is likely to reflect competitive conditions effectively, where the CMA has not received evidence to support an assessment of competitive dynamics other than those reflected in the filter; and
- (c) enables the CMA to conduct an efficient investigation, having regard to the limited time available within a Phase 1 investigation to carry out a detailed competitive assessment of a large number of local areas. This is particularly important in this case, where there are over 170 local areas for consideration.

74. As set out in more detail below, the decision rules adopted in this case take into account the key parameters of local competition, including the proximity of physical stores to customers. The CMA has not received evidence suggesting that there are specific additional parameters of competition that should be considered. As such, the CMA is satisfied, based on an assessment of the evidence taken in the round, that the decision rules identify those local areas which give rise to a realistic prospect of an SLC.

### ***Design of the decision rules***

75. In designing appropriate decision rules to use for this assessment, the CMA considered several factors, including:
- (a) the catchment areas within which competition is thought to take place;
  - (b) the competitor sites which should be included in the effective competitor set;
  - (c) the appropriate concentration measure(s) to be used in order to reflect competitive conditions; and
  - (d) the appropriate threshold(s) above which the CMA considers there to be a realistic prospect of an SLC in each local area.

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<sup>73</sup> The CMA notes that where merger firms conduct a non-systematic review of competitive conditions in individual local areas (ie considering different factors in different areas), it may be difficult for the CMA to verify whether the material presented to it provides a balanced picture of each particular area, or whether it presents a partial view which is favourable to the interests of the merger firms. [CMA129](#), paragraph 4.33

76. The CMA considers each of these factors in relation to the supply of (i) car parts to local IMT customers, (ii) car parts to local retail customers, and (iii) garage equipment to local IMT customers, in turn below.

### ***Supply of car parts to local IMT customers***

#### *Catchment areas*

77. The Parties submitted that the CMA should rely on the same local catchment areas for the supply of car parts to local IMT customers as were used in the CMA's Phase 1 investigation in *ECP/Andrew Page*. In that investigation, the CMA first defined catchment areas by:<sup>74</sup>
- (a) categorising Andrew Page sites by geographic location using ONS urban categorisations of (i) conurbation/city, (ii) city/town, and (iii) rural; and
  - (b) calculating individual catchment areas for a sample of each ONS type (based on the location of 80% of an Andrew Page site's customers by revenue) to derive average catchment areas for sites categorised as (i), (ii), or (iii) above.
78. This resulted in straight-line catchment areas of 4 miles for sites in a conurbation/city; 6 miles for sites in a city/town; and 9 miles for sites in rural areas.
79. As a second step, the CMA multiplied the radius associated with each Andrew Page site by two as a proxy to identify overlapping catchment areas between Andrew Page and ECP.<sup>75</sup>
80. The CMA considers, for the purposes of this Phase 1 investigation, that it is appropriate to adopt the same 4, 6, and 9 mile catchment areas by ONS type (using straight-line distances), and to multiply the radius for each site by two to account for

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<sup>74</sup> ME/6647/16 [ECP / Andrew Page \(2017\) – Phase 1 Decision](#), paragraph 57. In the CMA's phase 2 investigation in *ECP/Andrew Page*, the CMA adopted a more extensive approach and calculated catchment areas based on the location of 80% of a site's customers by revenue for each site of both parties (see [ECP / Andrew Page \(2017\) – Final Report](#), Appendix 5.2).

<sup>75</sup> As set out in ME/6647/16 [ECP / Andrew Page \(2017\) – Phase 1 Decision](#), footnote 18, and consistent with the CMA's established practice, for the catchment areas to be considered overlapping, it is not necessary for both Parties' sites to be within a given catchment area. This is because overlaps that require further assessment may arise where the catchment areas themselves overlap (since the merging parties may still be serving a common set of customers). Multiplying the radius associated with each Andrew Page site by two served as a proxy to identify such overlapping catchment areas. This was similar to 're-centring' the catchment area on an ECP site.

overlapping catchments.<sup>76</sup> Using these catchment areas, the CMA identified 172 of GSF's 179 sites as overlapping with an ECP site in the supply of car parts to local IMT customers.

### *Effective competitor set*

81. The Parties submitted that their main competitors in the supply of car parts to local IMT customers are MPD, Rapid Group, and AAG (which also operates through two UK distributor networks: United Aftermarket Network (UAN) and GroupAuto UK) (the **UK Competitors**).<sup>77</sup>
82. These competitors supply a similar range of car parts as the Parties to local IMT customers through local sites across the UK, and all operate either multiple brands and/or are part of larger, multi-national automotive groups.<sup>78</sup> The Parties noted that there may be additional local competitors in some local areas, but submitted that the Parties and the UK Competitors would cover the majority of revenues in any local area.<sup>79</sup>
83. The Parties' internal documents support limiting the competitor set to the UK Competitors, as they regularly track the UK Competitors in addition to tracking each other.<sup>80</sup> A third party competitor responding to the CMA's investigation also confirmed that the Parties and the UK Competitors are all relevant suppliers of car parts to local IMT customers and did not identify additional competitors (other than one which it ranked as weak, describing it as 'too small to have any significant impact against the larger players in the market').<sup>81</sup>
84. In view of the above, the CMA considers the UK Competitors to be the relevant competitors of the Parties for the purposes of the local competitive assessment.

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<sup>76</sup> While these catchment areas are based on customer revenue data for a selection of Andrew Page sites from 2017, in the CMA's Phase 2 investigation in *ECP/Andrew Page*, the catchment areas for Andrew Page sites and ECP sites were found to be broadly similar (see [ECP/ Andrew Page \(2017\) – Final Report](#), Appendix 5.2, paragraph 14). Furthermore, the CMA has not received evidence to indicate that catchment areas for GSF sites would significantly differ from Andrew Page or ECP sites, or that, more generally, catchment areas for general motor factors in the UK fluctuate significantly over time.

<sup>77</sup> FMN, paragraph 15.36.

<sup>78</sup> FMN, paragraphs 15.15 and 15.38.

<sup>79</sup> FMN, paragraph 15.37.

<sup>80</sup> For example: LKQ Internal Document, Annex 008.46 to the FMN [redacted]; and Uni-Select Internal Document, Annex 010.10 to the FMN [redacted].

<sup>81</sup> Response to the CMA questionnaire from a third party, June 2023, question 3 and 12.

### *Concentration measures*

85. The CMA generally considers that fascia count may be an appropriate measure of concentration if (among other considerations) brand is important to customers and customers choose between the fascia in their local area and where the offering at each individual store will be similar. Under this approach, stores with the same branding or fascia are considered to be acting together and therefore will constitute one fascia irrespective of how many practice sites have that fascia. A 'share of sites', however, takes into account how many stores within the same ownership are in a local area and may be a good measure of concentration if brand is not very important or visible to the customer. The share of sites can also be a useful measure in cases where factors such as distance are an important driver of competition since it aggregates sites within the area in which competition mostly takes place.<sup>82</sup>
86. The Parties submitted that the relevance of brand differs between customers.<sup>83</sup> According to the Parties, many customers do not consider brand to be important but will regard sites as separate choices (particularly as some local garages are part of an umbrella group, such as AAG, which acts as a buying group for independent garages with a separate local brand). For such customers, site counts would give an indication of the broadest choice available locally. On the other hand, some customers may place some value on the brand of the car part distributor, in which case fascia count may also be informative about customer choice.
87. The Parties submitted that, in reality, the amount of choice for a given customer is likely to lie somewhere between the concentration implied by site count (where brand does not matter at all) and fascia count (where all sites in the same fascia are considered as the same store).
88. In view of these submissions, the CMA considers it appropriate, on a cautious basis, to adopt both a share of sites and a share of fascia as alternative concentration measures for the purposes of the local assessment.

### *Concentration thresholds*

89. The threshold chosen for determining whether competition concerns arise is a case-by-case assessment taking into account all the facts and circumstances of a given case. In this case, the CMA considers that a 30% share threshold is appropriate to

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<sup>82</sup> CMA: [Retail Mergers Commentary \(CMA 62\)](#), paragraphs 3.21-3.24.

<sup>83</sup> FMN, paragraphs 15-27-15.30.

identify areas in which there is a realistic prospect of a substantial lessening of competition arising.

90. The CMA considers that this is appropriate given that it has received some evidence that suggests that while limited, there could be a degree of out-of-market constraint on the Parties (see further paragraphs 36 to 39 above regarding the constraint provided by OEM providers), while other evidence indicates that the Parties are close competitors in the supply of car parts to local IMT customers:
- (a) the Parties submitted that they compete closely for the supply of car parts to local IMT customers because they compete head-to-head on price, quality, range of services, and delivery times; offer similar products and compete for the same customers in local areas and view one another as key competitors;
  - (b) there is a substantial geographical overlap between the Parties' stores (see paragraph 61 above), meaning that local customers consider them both when deciding from whom to order car parts.<sup>84</sup>
  - (a) The Parties' internal documents also show that, when monitoring the market for the supply of car parts to IMT customers, they track each other frequently.
  - (c) One competitor responding to the CMA's investigation noted that the Parties compete closely because they sell a similar range of products and have sufficient scale to purchase (and then sell) products at competitive prices, and described GSF as the 'usual alternative' to ECP.<sup>85</sup>
91. In view of the above, the CMA considers that a decision rule threshold of 30% by site count and/or fascia count is appropriate to identify local catchment areas in which the Parties overlap that give rise to a realistic prospect of an SLC.

#### *Application of the decision rule*

92. By applying the above decision rule, the CMA found that the Merger raises significant competition concerns arising from horizontal unilateral effects in the supply of car parts to local IMT customers in 145 of the 172 local areas of overlap (as set out at Annex A). The Parties accepted that the test for reference is met in respect of these frames of reference.<sup>86</sup>

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<sup>84</sup> FMN, paragraph 15.41.

<sup>85</sup> Response to the CMA questionnaire from a third party, June 2023, questions 5 and 11.

<sup>86</sup> FMN, paragraphs 15.44 and 15.55.

## ***Supply of car parts to local retail customers***

### ***Catchment areas***

93. The Parties submitted that the CMA should use the same catchment areas for the supply of car parts to local retail customers as are used for the supply of car parts to local IMT customers. According to the Parties, the [X] of the Parties' local retail sales are fulfilled, either over-the-counter or via click-and-collect sales, from the same stores serving their local IMT customers.<sup>87</sup>
94. The CMA has not received evidence to indicate that catchment areas for local retail customers differ significantly compared to local IMT customers.<sup>88</sup>
95. In view of the above, the CMA has applied 4, 6, and 9 mile catchment areas by ONS type (conurbation/city, town/city, and rural local areas respectively), multiplied by two to identify overlapping catchment areas. Using these catchment areas, the CMA identified 172 of GSF's 179 sites as overlapping with an ECP site in the supply of car parts to local retail customers.

### ***Effective competitor set***

96. The Parties submitted that the UK Competitors in the supply of car parts to local IMT customers do not operate retail businesses, although they may supply a limited range of retail products as add-ons to their IMT offering.<sup>89</sup> Instead, for the purposes of the CMA's local competitive assessment, the Parties [X] identified Halfords as a relevant competitor.<sup>90</sup>
97. Halfords confirmed that, although not its main offering, it does supply some car parts through its local retail stores.<sup>91</sup>
98. In view of the above, the CMA has considered only Halfords as a relevant competitor for the purposes of the local competitive assessment.

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<sup>87</sup> Retail sales served through the Parties' local stores (including over-the-counter or click and collect) accounted for [X]% of GSF's retail revenues in 2022 and [X]% for ECP (Parties' response to RF15, 27 June 2023, pages 5 and 6).

<sup>88</sup> The Parties submitted that the approach of applying two times the radii associated with GSF's sites would also account for any potential wider catchment areas for click and collect customers (Annex 012 to the FMN, paragraph 8).

<sup>89</sup> FMN, paragraph 15.66.

<sup>90</sup> The Parties submitted that, while they also compete with online platforms such as Amazon and Autodoc, these platforms distribute from centralised distribution centres, and do not supply retail customers from local sites (FMN, paragraph 15.66).

<sup>91</sup> Note of a call with a third party, 8 June 2022.



### *Concentration measures*

99. On the basis of the available evidence, the CMA considers that local retail customers may have similarly mixed views regarding the importance of brand as for local IMT customers (as discussed at paragraphs 86 to 87 above). Therefore, on a cautious basis, and in line with the approach to the supply of car parts to local IMT customers, the CMA has adopted both a share of sites and a share of fascia as alternative concentration measures for the purposes of its local assessment.

### *Concentration thresholds*

100. The CMA has adopted the same 30% concentration threshold as for its assessment of the supply of car parts to local IMT customers. The CMA considers that this is appropriate given that it has received some evidence that suggests that while limited, there could be a degree of out-of-market constraint on the Parties from online suppliers,<sup>92</sup> but that there is also evidence indicating that the Parties are close competitors in the supply of car parts to local retail customers:

- (a) The Parties submitted that they each consider the other their closest competitor, primarily because the UK Competitors do not operate a dedicated retail business.<sup>93</sup>
- (b) The Parties' stores in the supply of car parts to local retail customers overlap in [90-100]% of the areas in which GSF is present.
- (c) A third party responding to the CMA's investigation noted that ECP and GSF are the only suppliers of car parts to local retail customers that it would consider strong competitively, and that GSF was one of the few viable alternatives to ECP.<sup>94</sup>

101. The CMA therefore considers a decision rule threshold of 30% by site count and/or fascia count is appropriate to identify local catchment areas in which the Parties overlap that give rise to a realistic prospect of an SLC.<sup>95</sup>

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<sup>92</sup> The Parties noted that they face some competition from online platforms like Amazon and eBay, these platforms distribute from centralised distribution centres, and do not supply retail customers from local sites: FMN, paragraphs 15.66 and 15.69.

<sup>93</sup> FMN, paragraphs 15.66 and 15.68.

<sup>94</sup> Response to the CMA questionnaire from a third party, June 2023, question 9.

<sup>95</sup> The CMA notes that because there are only three effective competitors in this frame of reference, relying on fascia count as a measure of concentration will always identify the Parties as having at least 66% share of supply. Consequently, all local areas in which the parties overlap will be identified as raising significant competition concerns.

### *Application of the decision rule*

102. By applying the above decision rule, the CMA has found that the Merger raises significant competition concerns arising from horizontal unilateral effects in the supply of car parts to local retail customers in all 172 local overlapping areas (as set out at Annex A). The Parties accepted that the test for reference is met in respect of these frames of reference.<sup>96</sup>

### ***Supply of garage equipment to local IMT customers***

#### *Catchment areas and the effective competitor set*

103. The Parties submitted that the same catchment areas and competitor set as for the supply of car parts to local IMT customers should also be used for the CMA's assessment of the supply of garage equipment to local IMT customers. The Parties submitted that this is because the competitive conditions in the supply of car parts and garage equipment to local IMT customers are similar (for the reasons summarised at paragraph 45 above).
104. As noted at paragraph 46 above, the CMA considers some demand- and supply-side differences may exist between the supply of both types of products to local IMT customers. Nevertheless, the CMA has not received evidence to indicate that catchment areas for garage equipment differ significantly compared to car parts, or that there are other material competitors for garage equipment beyond the Key Competitors.
105. The CMA has therefore applied the same catchment areas as for its local assessment for the supply of car parts to local IMT customers. This results in 172 of GSF's 179 sites overlapping with an ECP site in the supply of garage equipment to local IMT customers. The CMA also considers the UK Competitors to be relevant competitors for the purposes of the local competitive assessment.

#### *Concentration measures*

106. Based on the available evidence, the CMA considers the conclusions regarding the importance of brand in the supply of car parts to local IMT customers outlined in paragraphs 86 to 87 above also apply for the supply of garage equipment to local IMT customers. Therefore, on a cautious basis, and in line with the approach to the supply of car parts to local IMT customers, the CMA has adopted both a share of

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<sup>96</sup> FMN, paragraph 15.73.

sites and a share of fascia as alternative concentration measures for the purposes of its local assessment.

### *Concentration thresholds*

107. The CMA has adopted the same 30% concentration threshold as for its assessment of the supply of car parts to local IMT customers. The CMA considers that this is appropriate given the Parties submission that the competitive conditions for the supply of garage equipment are similar to those for the supply of car parts to IMT customers, and because there is also evidence indicating that the Parties are close competitors in the supply of garage equipment to local IMT customers:

- (a) The Parties consider that they are close competitors in the supply of garage equipment to local IMT customers, primarily because customers will often obtain quotes for garage equipment from both ECP and GSF (as well other motor factors and equipment manufacturers).<sup>97</sup>
- (b) The Parties also submitted that the large geographic overlap in their local sites (see paragraph 61 above) is evidence that they compete closely in the supply of garage equipment to local customers.<sup>98</sup>

108. The CMA therefore considers a decision rule threshold of 30% by site count and/or fascia count is appropriate to identify local catchment areas in which the Parties overlap that give rise to a realistic prospect of an SLC.

### *Application of the decision rule*

109. By applying the above decision rule, the CMA has found that the Merger raises significant competition concerns arising from horizontal unilateral effects in the supply of garage equipment to local IMT customers in 145 of the 172 local areas of overlap (as set out at Annex A). The Parties accepted that the test for reference is met in respect of these frames of reference.<sup>99</sup>

## **10. BARRIERS TO ENTRY AND EXPANSION**

110. Entry, or expansion of existing firms, can mitigate the initial effect of a merger on competition, and in some cases may mean that there is no SLC. In assessing

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<sup>97</sup> FMN, paragraph 15.56.

<sup>98</sup> FMN, paragraph 15.57.

<sup>99</sup> FMN, paragraphs 15.2 and 15.60.

whether entry or expansion might prevent an SLC, the CMA considers whether such entry or expansion would be timely, likely and sufficient.<sup>100</sup>

111. In relation to the SLCs, the CMA has not had to conclude on barriers to entry or expansion because the Parties accepted that the test for a reference is met and requested that the case be fast-tracked to consideration of UILs.

## **11. THIRD PARTY VIEWS**

112. The CMA contacted customers and competitors of the Parties as part of its investigation. Third party comments have been taken into account where appropriate in the competitive assessment above.

## **12. CONCLUSION ON SUBSTANTIAL LESSENING OF COMPETITION**

113. Based on the evidence set out above, the CMA believes that it is or may be the case that the Merger may be expected to result in an SLC as a result of horizontal unilateral effects in relation to:
- (a) the supply of car parts to Key Account customers nationally;
  - (b) the supply of car parts to local IMT customers in 145 (out of 172) overlap areas (as set out at Annex A);
  - (c) the supply of car parts to local retail customers in all 172 overlap areas (as set out at Annex A); and
  - (d) the supply of garage equipment to local IMT customers in 145 (out of 172) overlap areas (as set out at Annex A).

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<sup>100</sup> [CMA129](#), from paragraph 8.40.

## DECISION

114. Consequently, the CMA believes that it is or may be the case that (i) arrangements are in progress or in contemplation which, if carried into effect, will result in the creation of a relevant merger situation; and (ii) the creation of that situation may be expected to result in an SLC within a market or markets in the United Kingdom.
115. The CMA therefore believes that it is under a duty to refer under section 33(1) of the Act. However, the duty to refer is not exercised whilst the CMA is considering whether to accept undertakings under section 73 of the Act instead of making such a reference.<sup>101</sup> The Parties have until 28 July 2023<sup>102</sup> to offer an undertaking to the CMA.<sup>103</sup> The CMA will refer the Merger for a phase 2 investigation<sup>104</sup> if the Parties do not offer an undertaking by this date; if the Parties indicate before this date that they do not wish to offer an undertaking; or if the CMA decides<sup>105</sup> by 4 August 2023 that there are no reasonable grounds for believing that it might accept the undertaking offered by the Parties, or a modified version of it.

**Sorcha O'Carroll**  
**Senior Director, Mergers**  
**Competition and Markets Authority**  
**21 July 2023**

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<sup>101</sup> Section 33(3)(b) of the Act.

<sup>102</sup> Section 73A(1) of the Act.

<sup>103</sup> Section 73(2) of the Act.

<sup>104</sup> Sections 33(1) and 34ZA(2) of the Act.

<sup>105</sup> Section 73A(2) of the Act.

## ANNEX A: LIST OF PARTIES' LOCAL OVERLAPPING SLC SITES

**Table 1: List of GSF local overlapping SLC sites for both the supply of car parts to local IMT customers and the supply of garage equipment to local IMT customers<sup>106</sup>**

Number	Name of GSF site and postcode	Combined share-of-store count	Increment	Combined share-of-fascia count	Increment	Postcode of GSF and ECP site(s) in catchment area
1.	Andover SP10 4EY	[40-50]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> SP10 2NJ; <b>GSF:</b> SP10 4EY
2.	Anglesey LL60 6HR	[40-50]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> LL57 4SU; <b>GSF:</b> LL60 6HR, LL55 2BD
3.	Ashford TN24 0TL	[20-30]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> TN24 0SP; <b>GSF:</b> TN24 0TL
4.	Aylesbury HP19 8RY	[50-60]%	[10-20]%	[50-60]%	[20-30]%	<b>ECP:</b> HP19 8UP, LU7 4TN; <b>GSF:</b> HP19 8RY
5.	Banbury OX16 2RL	[20-30]%	[10-20]%	[50-60]%	[20-30]%	<b>ECP:</b> OX16 4XJ; <b>GSF:</b> OX16 2RL
6.	Barnstaple EX32 8QA	[30-40]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> EX31 3TA; <b>GSF:</b> EX32 8QA
7.	Basingstoke RG22 4AD	[30-40]%	[10-20]%	[50-60]%	[20-30]%	<b>ECP:</b> RG21 6YT; <b>GSF:</b> RG22 4AD
8.	Belfast BT12 6HT	[10-20]%	[0-5]%	[50-60]%	[20-30]%	<b>ECP:</b> BT5 6QR, BT36 4TY, BT12 6RD; <b>GSF:</b> BT12 6HT
9.	Beverley HU17 0JT	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> HU3 3EE, HU17 9DH; <b>GSF:</b> HU2 0JX, HU17 0JT
10.	Birmingham - Castle Vale B35 7AR	[30-40]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> B7 5ET, B11 3DJ; <b>GSF:</b> B90 4NY, B35 7AR

<sup>106</sup> As the CMA has applied the same decision rule (including considering the same effective competitors) for both the supply of car parts to local IMT customers and the supply of garage equipment to local IMT customers, the same sites give rise to a realistic prospect of an SLC for both frames of reference.

11.	Birmingham - Halesowen B62 8HN	[30-40]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> B62 8DF, DY5 1TX, B7 5ET, B30 3HP, B66 1NJ; <b>GSF:</b> B62 8HN, WV2 2HU, B66 1NU
12.	Birmingham – Smethwick B66 1NU	[30-40]%	[5-10]%	[30-40]%	[10-20]%	<b>ECP:</b> WS2 9LZ, B11 3DJ, B30 3HP, B62 8DF, B7 5ET, B66 1NJ, DY5 1TX, WV11 3DR; <b>GSF:</b> WV2 2HU, B66 1NU, B62 8HN
13.	Birmingham - Solihull B90 4NY	[30-40]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> B11 3DJ, B30 3HP, B7 5ET; <b>GSF:</b> B90 4NY , B35 7AR
14.	Blackburn BB1 3AR	[30-40]%	[20-30]%	[30-40]%	[10-20]%	<b>ECP:</b> BB3 0DG, PR1 5DP, BB9 5SP; <b>GSF:</b> PR7 1NY, BB11 4AA, BB1 3AR, PR1 5DP, BB5 1QX, BB7 1QD
15.	Blackpool FY4 2RP	[30-40]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> FY4 4ND; <b>GSF:</b> PR8 5RG, FY4 2RP
16.	Bournemouth BH8 8BH	[30-40]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> BH11 8JR, BH23 3PE, BH12 3LL; <b>GSF:</b> BH8 8BH, BH12 3PF
17.	Bridgend CF31 3TP	[20-30]%	[10-20]%	[50-60]%	[20-30]%	<b>ECP:</b> CF37 5UA; <b>GSF:</b> CF31 3TP
18.	Brighton - Hove BN3 7BA	[50-60]%	[30-40]%	[30-40]%	[10-20]%	<b>ECP:</b> BN14 8NQ, RH15 9NB, BN3 5RY; <b>GSF:</b> BN7 2FB, BN3 7BA, BN14 8PQ, RH15 9RD, BN5 9DF
19.	Bristol - Avonmouth BS11 9YE	[40-50]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> BS34 7JU, BS4 3QQ, NP19 4SL, BS11 8DT; <b>GSF:</b> BS5 0SP, BS32 4RX, BS11 9YE, NP19 4SL, BS3 2LD
20.	Bristol Central - Easton BS5 0SP	[40-50]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> BA1 3JL, BS4 3QQ, BS11 8DT, BS34 7JU; <b>GSF:</b> BS5 0SP, BS3 2LD, BS11 9YE, BS32 4RX
21.	Bristol North - Aztec West BS32 4RX	[30-40]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> BS4 3QQ, BS11 8DT, BS34 7JU; <b>GSF:</b> BS3 2LD, BS11 9YE, BS32 4RX, BS5 0SP
22.	Bristol South - Ashton Gate BS3 2LD	[40-50]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> BS11 8DT, BS34 7JU, BS4 3QQ, BA1 3JL; <b>GSF:</b> BS11 9YE, BS5 0SP, BS3 2LD, BS32 4RX
23.	Bromsgrove B60 3DX	[40-50]%	[20-30]%	[30-40]%	[10-20]%	<b>ECP:</b> B60 3DX, B30 3HP, DY5 1TX, B62 8DF, WR4 9PT; <b>GSF:</b> B62 8HN,

						DY11 7AR, B98 7SE, WR4 9PT, B60 3DX
24.	Burgess Hill RH15 9RD	[40-50]%	[30-40]%	[30-40]%	[10-20]%	<b>ECP:</b> RH15 9NB, BN3 5RY; <b>GSF:</b> RH15 9RD, BN3 7BA, BN5 9DF, BN7 2FB, RH12 2NW
25.	Burnley BB11 4AA	[30-40]%	[20-30]%	[30-40]%	[10-20]%	<b>ECP:</b> BB9 5SP, BB3 0DG; <b>GSF:</b> BB11 4AA, BB1 3AR, BB5 1QX, BB7 1QD
26.	Burton DE14 2WD	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> DE14 1PT; <b>GSF:</b> DE1 2SX, DE14 2WD
27.	Caernarfon LL55 2BD	[50-60]%	[30-40]%	[40-50]%	[20-30]%	<b>ECP:</b> LL57 4SU; <b>GSF:</b> LL55 2BD, LL60 6HR, LL49 9NZ
28.	Camborne TR14 0PY	[30-40]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> TR20 8AS, TR4 9LD; <b>GSF:</b> TR10 9EP, TR14 0PY
29.	Cambridge CB4 2PF	[50-60]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> CB5 8HY; <b>GSF:</b> CB4 2PF
30.	Cannock WS11 7FJ	[30-40]%	[5-10]%	[40-50]%	[20-30]%	<b>ECP:</b> WV11 3DR, WS2 9LZ, WS11 0XE; <b>GSF:</b> WS11 7FJ
31.	Carmarthen SA31 2BG	[40-50]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> SA31 2NF; <b>GSF:</b> SA31 2BG
32.	Chelmsford CM2 6TG	[20-30]%	[5-10]%	[40-50]%	[20-30]%	<b>ECP:</b> CM7 2GB, CM1 2QX, SS14 3WB; <b>GSF:</b> CM2 6TG
33.	Cheltenham North GL51 9NZ	[50-60]%	[30-40]%	[50-60]%	[20-30]%	<b>ECP:</b> GL51 9FD, GL2 5HA; <b>GSF:</b> GL51 8PL, GL2 5DH, GL51 9NZ, GL4 3SJ
34.	Cheltenham South GL51 8PL	[50-60]%	[30-40]%	[50-60]%	[20-30]%	<b>ECP:</b> GL2 5HA, GL51 9FD; <b>GSF:</b> GL51 8PL, GL51 9NZ, GL4 3SJ, GL2 5DH
35.	Chester CH1 4NS	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> CH1 4LX, LL13 8DW; <b>GSF:</b> CH1 4NS, LL11 4YL
36.	Chichester PO19 7BJ	[40-50]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> PO19 8ET, GU27 1DW, BN14 8NQ, BN16 3HQ, PO6 1US, PO3 5FN; <b>GSF:</b> PO19 7BJ, BN14 8PQ, PO3 6FH, BN17 5DF, GU27 1DW
37.	Chorley PR7 1NY	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> BB3 0DG, BL2 1HA, WN3 4DA, PR1 5DP; <b>GSF:</b> BB1 3AR, PR1 5DP, WN1 3DG, PR7 1NY
38.	Clitheroe BB7 1QD	[30-40]%	[20-30]%	[30-40]%	[10-20]%	<b>ECP:</b> BB3 0DG, BB9 5SP; <b>GSF:</b> BB7 1QD, BB11 4AA, BB5 1QX, BB1 3AR



39.	Colchester CO4 9XP	[20-30]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> CO4 9QX; <b>GSF:</b> CO4 9XP
40.	Coventry CV6 5RY	[10-20]%	[5-10]%	[30-40]%	[10-20]%	<b>ECP:</b> CV34 5WP, CV2 4QP; <b>GSF:</b> CV6 5RY, CV31 3LH
41.	Crewe CW1 6AE	[20-30]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> ST5 0UU, CW1 6FA; <b>GSF:</b> CW1 6AE, ST4 1PU
42.	Croydon CR0 4TQ	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> CR0 4RU, SW19 2QA, CR0 3HH, KT2 5BQ, SE6 3BX, KT9 2NY, SM3 9BW, SW2 5DZ; <b>GSF:</b> CR0 4TQ, SE26 5AQ
43.	Daventry NN11 8RB	[20-30]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> NN5 5JH; <b>GSF:</b> NN1 2PN, NN11 8RB
44.	Doncaster DN2 4NH	[30-40]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> DN2 4LT; <b>GSF:</b> DN2 4NH
45.	Dover CT16 3PT	[40-50]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> CT19 5DS; <b>GSF:</b> CT16 3PT
46.	East Grinstead RH19 1XZ	[50-60]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> RH10 9RX, RH1 2NL, RH10 9AN; <b>GSF:</b> RH19 1XZ
47.	Eastbourne BN22 8PW	[20-30]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> BN23 6PQ; <b>GSF:</b> BN22 8PW
48.	Enfield EN3 7TY	[40-50]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> N19 3QQ, EN11 0NE, E3 2JE, N18 3BH, EN1 1SH, IG8 8EY; <b>GSF:</b> IG8 8HF, N17 7RQ, EN3 7TY
49.	Exeter EX2 8RG	[20-30]%	[5-10]%	[30-40]%	[10-20]%	<b>ECP:</b> EX2 8HE, TQ12 3BN; <b>GSF:</b> EX2 8RG
50.	Farnham GU9 9LQ	[50-60]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> GU27 1DW, GU2 7YB, GU21 5JZ, GU15 3DH, GU35 0SJ, GU14 8EH; <b>GSF:</b> GU27 1DW, GU9 9LQ
51.	Frome BA11 4BG	[40-50]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> BA11 2RY, BA3 2BB, BA1 3JL; <b>GSF:</b> BA11 4BG
52.	Gateshead NE21 5TR	[20-30]%	[5-10]%	[30-40]%	[10-20]%	<b>ECP:</b> NE12 9SW, NE15 8NZ, NE11 0TE; <b>GSF:</b> NE21 5TR, NE12 9SZ
53.	Gloucester North GL4 3SJ	[40-50]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> GL51 9FD, GL2 5HA; <b>GSF:</b> GL4 3SJ, GL51 9NZ, GL2 5DH, GL51 8PL
54.	Gloucester South GL2 5DH	[50-60]%	[30-40]%	[40-50]%	[20-30]%	<b>ECP:</b> GL51 9FD, GL2 5HA; <b>GSF:</b> GL51 9NZ, GL2 5DH, GL51 8PL, GL4 3SJ
55.	Goole DN14 6XF	[20-30]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> YO8 8LZ; <b>GSF:</b> DN14 6XF

56.	Harrogate HG1 4QE	[50-60]%	[30-40]%	[50-60]%	[20-30]%	<b>ECP:</b> HG3 1QW; <b>GSF:</b> LS21 3DT, HG1 4QE
57.	Haslemere GU27 1DW	[40-50]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> GU35 0SJ, GU27 1DW; <b>GSF:</b> GU27 1DW, GU9 9LQ
58.	Hastings TN38 9BA	[40-50]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> TN38 9BB; <b>GSF:</b> TN38 9BA
59.	Hemel Hempstead HP3 9AJ	[60-70]%	[30-40]%	[50-60]%	[20-30]%	<b>ECP:</b> AL1 5HT, WD23 2GD, HP2 7PT; <b>GSF:</b> HP3 9AJ, WD18 7EN, WD24 5RR
60.	Henfield BN5 9DF	[40-50]%	[20-30]%	[30-40]%	[10-20]%	<b>ECP:</b> RH10 9RX, BN3 5RY, BN14 8NQ, RH15 9NB, BN16 3HQ, RH10 9AN; <b>GSF:</b> RH12 2NW, BN5 9DF, BN7 2FB, BN3 7BA, RH15 9RD, RH19 1XZ, BN17 5DF, BN14 8PQ
61.	High Wycombe HP13 7EJ	[40-50]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> HP10 9RS, SL6 7BN, SL2 5AD, UB8 2DB; <b>GSF:</b> SL1 4QU, HP13 7EJ
62.	Horsham RH12 2NW	[40-50]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> RH10 9RX, RH10 9AN, RH15 9NB; <b>GSF:</b> RH15 9RD, BN5 9DF, RH12 2NW
63.	Hull HU2 0JX	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> HU17 9DH, HU3 3EE; <b>GSF:</b> HU17 0JT, HU2 0JX
64.	Ipswich IP1 5BN	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> IP1 5NX; <b>GSF:</b> IP1 5BN
65.	Kidderminster DY11 7AR	[50-60]%	[20-30]%	[30-40]%	[10-20]%	<b>ECP:</b> B60 3DX, DY5 1TX, WR4 9PT, B62 8DF; <b>GSF:</b> DY11 7AR, WR4 9PT, B60 3DX, B62 8HN
66.	Leamington Spa CV31 3LH	[30-40]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> CV2 4QP, CV34 5WP; <b>GSF:</b> CV6 5RY, CV31 3LH
67.	Leeds East LS8 5DU	[30-40]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> LS13 4PN, BD4 8AL, LS27 0EL, LS9 0RJ; <b>GSF:</b> LS4 2AR, LS8 5DU, LS10 2BG
68.	Letchworth SG6 1JZ	[30-40]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> SG1 2BH; <b>GSF:</b> LU1 3XJ, SG6 1JZ
69.	Lewes BN7 2FB	[40-50]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> RH15 9NB, BN3 5RY; <b>GSF:</b> BN7 2FB, BN3 7BA, RH15 9RD

70.	Lincoln LN6 7QY	[20-30]%	[5-10]%	[30-40]%	[10-20]%	<b>ECP:</b> LN6 7UB, LN2 4JB; <b>GSF:</b> LN6 7QY
71.	Littlehampton BN17 5DF	[40-50]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> BN14 8NQ, PO19 8ET, BN16 3HQ; <b>GSF:</b> BN17 5DF, BN14 8PQ, PO19 7BJ
72.	Liverpool - Aintree L9 5AY	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> L5 9YN, CH41 9HH; <b>GSF:</b> L9 5AY, L5 9UB
73.	Liverpool - Bootle L5 9UB	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> CH41 9HH, L5 9YN; <b>GSF:</b> CH43 3DS, L5 9UB, L9 5AY
74.	Llandudno LL31 9PN	[50-60]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> LL22 7LA; <b>GSF:</b> LL31 9PN
75.	Llanelli SA14 8LQ	[40-50]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> SA4 9WG, SA7 9AH; <b>GSF:</b> SA6 8JG, SA14 8LQ
76.	Luton LU1 3XJ	[30-40]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> SG1 2BH, LU7 4TN, HP2 7PT, LU1 1XL, AL1 5HT; <b>GSF:</b> HP3 9AJ, AL7 1EW, LU1 3XJ, SG6 1JZ
77.	Macclesfield SK10 1LT	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> SK4 2JZ, SK6 2RF; <b>GSF:</b> M22 4QE, SK10 1LT
78.	Maidstone ME15 6HA	[20-30]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> ME2 4LT, ME15 9HF, ME20 7FE; <b>GSF:</b> ME2 4LY, ME15 6HA, ME10 2PD
79.	Malvern WR14 1GF	[30-40]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> WR4 9PT; <b>GSF:</b> WR14 1GF, WR4 9PT
80.	Manchester - Trafford Park M17 1QR	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> M17 1DB, M45 8FJ, SK4 2JZ; <b>GSF:</b> M22 4QE, M17 1QR
81.	Manchester - Wythenshawe M22 4QE	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> SK4 2JZ, M17 1DB, SK6 2RF; <b>GSF:</b> M17 1QR, M22 4QE
82.	Mansfield NG19 9BG	[20-30]%	[5-10]%	[30-40]%	[10-20]%	<b>ECP:</b> NG19 7JY, S41 7JL, NG6 8YP; <b>GSF:</b> NG19 9BG
83.	Merthyr CF48 4XA	[10-20]%	[5-10]%	[30-40]%	[10-20]%	<b>ECP:</b> CF37 5UA; <b>GSF:</b> CF48 4XA
84.	Middlesbrough TS6 6RU	[10-20]%	[5-10]%	[30-40]%	[10-20]%	<b>ECP:</b> TS18 3QX; <b>GSF:</b> TS6 6RU
85.	Milton Keynes MK1 1EQ	[40-50]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> MK15 8HQ, MK6 4AE, LU7 4TN; <b>GSF:</b> MK1 1EQ
86.	Neath SA10 7NH	[30-40]%	[10-20]%	[50-60]%	[20-30]%	<b>ECP:</b> SA7 9AH, SA4 9WG; <b>GSF:</b> SA6 8JG, SA10 7NH

87.	Newcastle NE12 9SZ	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> NE11 0TE, NE12 9SW, NE15 8NZ; <b>GSF:</b> NE35 9LZ, NE12 9SZ, NE21 5TR
88.	Newport NP19 4SL	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> NP19 4SL, CF24 5HF; <b>GSF:</b> CF24 1RF, NP19 4SL, CF14 4QA, BS11 9YE
89.	Newquay TR9 6TL	[10-20]%	[5-10]%	[40-50]%	[20-30]%	<b>ECP:</b> TR4 9LD; <b>GSF:</b> TR9 6TL
90.	Northallerton DL6 2XE	[40-50]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> YO7 3TA; <b>GSF:</b> DL6 2XE
91.	Northampton NN1 2PN	[30-40]%	[20-30]%	[30-40]%	[10-20]%	<b>ECP:</b> NN5 5JH; <b>GSF:</b> NN11 8RB, NN1 2PN
92.	Northwich CW9 7LU	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> WA2 8HQ, WA8 0SS; <b>GSF:</b> WA5 0LS, CW9 7LU
93.	Norwich NR6 6RA	[40-50]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> NR3 2AW, NR4 6DG; <b>GSF:</b> NR6 6RA
94.	Nottingham NG2 3GG	[20-30]%	[5-10]%	[30-40]%	[10-20]%	<b>ECP:</b> NG7 2PX, NG6 8YP; <b>GSF:</b> NG2 3GG
95.	Oldham OL1 3PA	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> OL16 5QX, OL9 7PN; <b>GSF:</b> OL1 3PA, OL16 5RD, SK16 4UP
96.	Otley LS21 3DT	[30-40]%	[5-10]%	[30-40]%	[10-20]%	<b>ECP:</b> BD4 8AL, LS13 4PN, HG3 1QW; <b>GSF:</b> LS21 3DT
97.	Oxford - Abingdon OX14 5JX	[50-60]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> OX4 6HE, OX14 1TR; <b>GSF:</b> OX4 2RD, OX14 5JX
98.	Oxford - Cowley OX4 2RD	[40-50]%	[10-20]%	[50-60]%	[20-30]%	<b>ECP:</b> OX26 4PL, OX14 1TR, OX4 6HE; <b>GSF:</b> OX14 5JX, OX4 2RD
99.	Penryn TR10 9EP	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> TR4 9LD; <b>GSF:</b> TR14 0PY, TR10 9EP
100.	Plymouth North PL7 1RF	[30-40]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> PL12 6LD, PL7 1RF; <b>GSF:</b> PL7 1RF, PL12 6LD, PL4 0SF
101.	Plymouth South PL4 0SF	[30-40]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> PL7 1RF, PL12 6LD; <b>GSF:</b> PL7 1RF, PL12 6LD, PL4 0SF
102.	Poole BH12 3PF	[30-40]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> BH11 8JR, BH12 3LL, BH23 3PE; <b>GSF:</b> BH8 8BH, BH12 3PF
103.	Portsmouth PO3 6FH	[20-30]%	[5-10]%	[30-40]%	[10-20]%	<b>ECP:</b> PO16 8XG, PO6 1US, PO3 5FN; <b>GSF:</b> PO3 6FH

104.	Preston PR1 5DP	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> BB3 0DG, PR1 5DP; <b>GSF:</b> PR1 5DP, BB1 3AR, PR7 1NY
105.	Reading RG2 0AU	[20-30]%	[5-10]%	[30-40]%	[10-20]%	<b>ECP:</b> RG41 2QJ, RG1 8LX, GU15 3DH, RG2 0DY; <b>GSF:</b> RG2 0AU
106.	Redditch B98 7SE	[40-50]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> B11 3DJ, B30 3HP, B60 3DX; <b>GSF:</b> B60 3DX, B90 4NY, B98 7SE
107.	Rhyl LL18 2AB	[50-60]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> LL22 7LA; <b>GSF:</b> LL18 2AB
108.	Romford RM11 2SJ	[30-40]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> RM3 8AA, IG8 8EY, IG11 7BG; <b>GSF:</b> RM20 3FH, IG8 8HF, RM11 2SJ
109.	Saltash PL12 6LD	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> PL7 1RF, PL15 7ED, PL12 6LD; <b>GSF:</b> PL4 0SF, PL7 1RF, PL12 6LD
110.	Shrewsbury SY1 4YA	[40-50]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> SY1 3TG; <b>GSF:</b> SY1 4YA
111.	Sidcup DA14 5BL	[40-50]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> RM20 3ED, BR5 3HP, SE18 5PQ, SE6 3BX, DA1 4QX; <b>GSF:</b> RM20 3FH, DA16 3DP, DA14 5BL, SE26 5AQ
112.	Sittingbourne ME10 2PD	[20-30]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> ME2 4LT, ME15 9HF; <b>GSF:</b> ME2 4LY, ME15 6HA, ME10 2PD
113.	Skipton BD23 2QR	[50-60]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> BD21 5JT, BB9 5SP; <b>GSF:</b> BD23 2QR
114.	Slough SL1 4QU	[40-50]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> UB4 0UP, SL2 5AD, HP10 9RS, SL6 7BN, TW18 4LH, UB8 2DB, KT16 9BQ; <b>GSF:</b> SL1 4QU, HP13 7EJ, TW14 0LW, UB3 1AP
115.	Southampton North SO50 4NT	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> SO15 0LA, PO16 8XG, SO53 4BZ; <b>GSF:</b> SO50 4NT, SO40 9LA
116.	Southampton West SO40 9LA	[20-30]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> SO15 0LA, SO53 4BZ; <b>GSF:</b> SO50 4NT, SO40 9LA
117.	Southend SS2 5TE	[20-30]%	[5-10]%	[40-50]%	[20-30]%	<b>ECP:</b> SS14 3WB, SS2 6LG; <b>GSF:</b> SS2 5TE
118.	Southport PR8 5RG	[30-40]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> FY4 4ND; <b>GSF:</b> L9 5AY, FY4 2RP, PR8 5RG
119.	St. Helens WA9 5GZ	[30-40]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> WA9 5JD, WA2 8HQ, WA8 0SS; <b>GSF:</b> WA8 8FZ, WA9 5GZ, WA5 0LS

120.	Stoke ST4 1PU	[20-30]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> ST5 0UU, CW1 6FA; <b>GSF:</b> CW1 6AE, ST4 1PU
121.	Strood ME2 4LY	[30-40]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> RM20 3ED, ME2 4LT, ME15 9HF, DA11 0DA, ME20 7FE; <b>GSF:</b> RM20 3FH, ME10 2PD, ME15 6HA, ME2 4LY
122.	Sunderland NE35 9LZ	[20-30]%	[5-10]%	[30-40]%	[10-20]%	<b>ECP:</b> NE12 9SW, NE11 0TE, SR5 3RX; <b>GSF:</b> NE12 9SZ, NE35 9LZ
123.	Swansea SA6 8JG	[30-40]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> SA7 9AH, SA4 9WG; <b>GSF:</b> SA6 8JG, SA10 7NH, SA14 8LQ
124.	Swindon SN3 4NS	[20-30]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> SN5 8WQ; <b>GSF:</b> SN3 4NS
125.	Sydenham SE26 5AQ	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> SW19 2QA, CR0 4RU, SE18 5PQ, BR5 3HP, SE6 3BX, CR0 3HH, SW2 5DZ, E3 2JE; <b>GSF:</b> CR0 4TQ, SE26 5AQ, DA14 5BL, DA16 3DP
126.	Taunton TA2 8QY	[20-30]%	[5-10]%	[40-50]%	[20-30]%	<b>ECP:</b> TA2 8RX, TA6 4DH; <b>GSF:</b> TA2 8QY
127.	Telford TF7 4NZ	[30-40]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> TF3 3AY; <b>GSF:</b> TF7 4NZ
128.	Thanet CT9 5TA	[40-50]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> CT10 2PR; <b>GSF:</b> CT9 5TA
129.	Thurrock RM20 3FH	[30-40]%	[10-20]%	[30-40]%	[10-20]%	<b>ECP:</b> DA1 4QX, DA11 0DA, RM20 3ED; <b>GSF:</b> DA16 3DP, DA14 5BL, RM11 2SJ, RM20 3FH
130.	Torquay TQ2 7QL	[30-40]%	[10-20]%	[40-50]%	[20-30]%	<b>ECP:</b> TQ12 3BN, TQ1 4RY; <b>GSF:</b> TQ2 7QL
131.	Tunbridge Wells TN2 3EH	[40-50]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> TN2 3EN; <b>GSF:</b> TN2 3EH
132.	Wakefield WF2 9LP	[20-30]%	[5-10]%	[30-40]%	[10-20]%	<b>ECP:</b> LS9 0RJ, LS27 0EL, WF6 1TF, WF2 7AL; <b>GSF:</b> LS10 2BG, WF2 9LP
133.	Watford North WD24 5RR	[50-60]%	[20-30]%	[50-60]%	[20-30]%	<b>ECP:</b> HP2 7PT, WD23 2GD, WD6 2BT, AL1 5HT, HA1 2HP; <b>GSF:</b> WD18 7EN, WD24 5RR, HP3 9AJ
134.	Watford South WD18 7EN	[50-60]%	[20-30]%	[40-50]%	[20-30]%	<b>ECP:</b> WD6 2BT, HA1 2HP, WD23 2GD; <b>GSF:</b> WD18 7EN, WD24 5RR, HP3 9AJ

135.	Welling DA16 3DP					<b>ECP:</b> BR5 3HP, SE6 3BX, IG11 7BG, E3 2JE, RM20 3ED, DA1 4QX, SE18 5PQ; <b>GSF:</b> DA16 3DP, SE26 5AQ, DA14 5BL, RM20 3FH
		[30-40]%	[10-20]%	[30-40]%	[10-20]%	
136.	Welwyn Garden City AL7 1EW					<b>ECP:</b> HP2 7PT, AL1 5HT, WD6 2BT, SG1 2BH, EN11 0NE; <b>GSF:</b> AL7 1EW, LU1 3XJ
		[30-40]%	[5-10]%	[30-40]%	[10-20]%	
137.	Weymouth DT3 4FL					<b>ECP:</b> DT3 4FL; <b>GSF:</b> DT3 4FL
		[50-60]%	[20-30]%	[50-60]%	[20-30]%	
138.	Wigan WN1 3DG					<b>ECP:</b> WN3 4DA; <b>GSF:</b> PR7 1NY, WN1 3DG
		[20-30]%	[10-20]%	[40-50]%	[20-30]%	
139.	Wirral CH43 3DS					<b>ECP:</b> CH41 9HH, L5 9YN; <b>GSF:</b> L5 9UB, CH43 3DS
		[20-30]%	[10-20]%	[30-40]%	[10-20]%	
140.	Wolverhampton WV2 2HU					<b>ECP:</b> WS2 9LZ, WS11 0XE, WV11 3DR, DY5 1TX, B66 1NJ; <b>GSF:</b> B66 1NU, WV2 2HU, B62 8HN
		[30-40]%	[10-20]%	[40-50]%	[20-30]%	
141.	Worcester WR4 9PT					<b>ECP:</b> WR4 9PT, B60 3DX; <b>GSF:</b> DY11 7AR, B60 3DX, WR14 1GF, WR4 9PT
		[50-60]%	[30-40]%	[30-40]%	[10-20]%	
142.	Worthing BN14 8PQ					<b>ECP:</b> BN16 3HQ, BN14 8NQ, BN3 5RY; <b>GSF:</b> BN5 9DF, BN14 8PQ, BN3 7BA, BN17 5DF
		[50-60]%	[20-30]%	[30-40]%	[10-20]%	
143.	Wrexham LL11 4YL					<b>ECP:</b> CH1 4LX, LL13 8DW; <b>GSF:</b> CH1 4NS, LL11 4YL
		[30-40]%	[10-20]%	[30-40]%	[10-20]%	
144.	Yeovil BA22 8XG					<b>ECP:</b> BA20 2PJ; <b>GSF:</b> BA22 8XG
		[40-50]%	[20-30]%	[40-50]%	[20-30]%	
145.	York YO30 4US					<b>ECP:</b> YO30 4WU; <b>GSF:</b> YO30 4US
		[50-60]%	[20-30]%	[60-70]%	[30-40]%	

**Table 2: List of GSF local overlapping SLC sites for the supply of car parts to local retail customers**

Number	Name of GSF site and postcode	Combined share-of-store count	Increment	Combined share-of-fascia count	Increment	Postcode of GSF and ECP site(s) in catchment area
1.	Accrington BB5 1QX	[70-80]%	[50-60]%	[60-70]%	[30-40]%	<b>ECP:</b> BB9 5SP, BB3 0DG; <b>GSF:</b> BB7 1QD, BL9 6AQ, BB5 1QX, BB1 3AR, BB11 4AA
2.	Andover SP10 4E	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> SP10 2NJ; <b>GSF:</b> SP10 4EY
3.	Anglesey LL60 6HR	[90-100]%	[60-70]%	[90-100]%	[50-60]%	<b>ECP:</b> LL57 4SU; <b>GSF:</b> LL55 2BD, LL60 6HR
4.	Ashford TN24 0TL	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> TN24 0SP; <b>GSF:</b> TN24 0TL
5.	Aylesbury HP19 8RY	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> HP19 8UP, LU7 4TN; <b>GSF:</b> HP19 8RY
6.	Banbury OX16 2RL	[90-100]%	[50-60]%	[90-100]%	[50-60]%	<b>ECP:</b> OX16 4XJ; <b>GSF:</b> OX16 2RL
7.	Barnstaple EX32 8QA	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> EX31 3TA; <b>GSF:</b> EX32 8QA
8.	Basingstoke RG22 4AD	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> RG21 6YT; <b>GSF:</b> RG22 4AD
9.	Belfast BT12 6HT	[40-50]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> BT12 6RD, BT36 4TY, BT5 6QR; <b>GSF:</b> BT12 6HT
10.	Beverley HU17 0JT	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> HU3 3EE, HU17 9DH; <b>GSF:</b> HU17 0JT , HU2 0JX
11.	Birmingham - Castle Vale B35 7AR	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> B7 5ET, B11 3DJ; <b>GSF:</b> B90 4NY , B35 7AR
12.	Birmingham - Halesowen B62 8HN	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> B62 8DF, DY5 1TX, B30 3HP, B66 1NJ, B7 5ET; <b>GSF:</b> B66 1NU, B62 8HN, WV2 2HU
13.	Birmingham - Smethwick B66 1NU	[60-70]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> B62 8DF, B11 3DJ, WV11 3DR, WS2 9LZ, B66 1NJ, DY5 1TX, B7 5ET, B30 3HP; <b>GSF:</b> B62 8HN, WV2 2HU, B66 1NU



14.	Birmingham - Solihull B90 4NY	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> B11 3DJ, B30 3HP, B7 5ET; <b>GSF:</b> B35 7AR , B90 4NY
15.	Blackburn BB1 3AR	[70-80]%	[50-60]%	[60-70]%	[30-40]%	<b>ECP:</b> BB9 5SP, PR1 5DP, BB3 0DG; <b>GSF:</b> BB5 1QX, PR1 5DP, BB1 3AR, BB7 1QD, BB11 4AA, PR7 1NY
16.	Blackpool FY4 2RP	[60-70]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> FY4 4ND; <b>GSF:</b> FY4 2RP, PR8 5RG
17.	Bournemouth BH8 8BH	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> BH11 8JR, BH23 3PE, BH12 3LL; <b>GSF:</b> BH8 8BH, BH12 3PF
18.	Bradford Central BD4 7EA	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> LS27 0EL, BD4 8AL, HX1 4PN, LS13 4PN; <b>GSF:</b> BD4 7EA, LS4 2AR
19.	Bridgend CF31 3TP	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> CF37 5UA; <b>GSF:</b> CF31 3TP
20.	Brighton - Hove BN3 7BA	[70-80]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> RH15 9NB, BN3 5RY, BN14 8NQ; <b>GSF:</b> RH15 9RD, BN3 7BA, BN7 2FB, BN5 9DF, BN14 8PQ
21.	Bristol - Avonmouth BS11 9YE	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> BS11 8DT, BS34 7JU, NP19 4SL, BS4 3QQ; <b>GSF:</b> BS5 0SP, BS3 2LD, BS32 4RX, NP19 4SL, BS11 9YE
22.	Bristol Central - Easton BS5 0SP	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> BS11 8DT, BS4 3QQ, BA1 3JL, BS34 7JU; <b>GSF:</b> BS5 0SP, BS32 4RX, BS11 9YE, BS3 2LD
23.	Bristol North - Aztec West BS32 4RX	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> BS34 7JU, BS4 3QQ, BS11 8DT; <b>GSF:</b> BS5 0SP, BS3 2LD, BS11 9YE, BS32 4RX
24.	Bristol South - Ashton Gate BS3 2LD	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> BS11 8DT, BA1 3JL, BS4 3QQ, BS34 7JU; <b>GSF:</b> BS32 4RX, BS11 9YE, BS3 2LD, BS5 0SP
25.	Bromsgrove B60 3DX	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> DY5 1TX, B60 3DX, WR4 9PT, B30 3HP, B62 8DF; <b>GSF:</b> B62 8HN, B60 3DX, DY11 7AR, WR4 9PT, B98 7SE

26.	Burgess Hill RH15 9RD	[60-70]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> RH15 9NB, BN3 5RY; <b>GSF:</b> BN5 9DF, BN3 7BA, RH12 2NW, RH15 9RD, BN7 2FB
27.	Burnley BB11 4AA	[80-90]%	[50-60]%	[60-70]%	[30-40]%	<b>ECP:</b> BB9 5SP, BB3 0DG; <b>GSF:</b> BB11 4AA, BB5 1QX, BB1 3AR, BB7 1QD
28.	Burton DE14 2WD	[50-60]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> DE14 1PT; <b>GSF:</b> DE1 2SX, DE14 2WD
29.	Bury BL9 6AQ	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> M45 8FJ, OL9 7PN, BL2 1HA, OL16 5QX; <b>GSF:</b> OL16 5RD, BL9 6AQ
30.	Caernarfon LL55 2BD	[90-100]%	[70-80]%	[90-100]%	[50-60]%	<b>ECP:</b> LL57 4SU; <b>GSF:</b> LL60 6HR, LL49 9NZ, LL55 2BD
31.	Camborne TR14 0PY	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> TR20 8AS, TR4 9LD; <b>GSF:</b> TR10 9EP, TR14 0PY
32.	Cambridge CB4 2PF	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> CB5 8HY; <b>GSF:</b> CB4 2PF
33.	Cannock WS11 7FJ	[80-90]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> WS2 9LZ, WV11 3DR, WS11 0XE; <b>GSF:</b> WS11 7FJ
34.	Cardiff Birchgrove CF14 4QA	[40-50]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> NP19 4SL, CF37 5UA, CF24 5HF; <b>GSF:</b> NP19 4SL, CF11 8BA, CF24 1RF, CF14 4QA
35.	Cardiff East CF24 1RF	[40-50]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> CF24 5HF, NP19 4SL, CF37 5UA; <b>GSF:</b> NP19 4SL, CF14 4QA, CF11 8BA, CF24 1RF
36.	Cardiff South CF11 8BA	[40-50]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> CF37 5UA, CF24 5HF; <b>GSF:</b> CF24 1RF, CF11 8BA, CF14 4QA
37.	Carmarthen SA31 2BG	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> SA31 2NF; <b>GSF:</b> SA31 2BG
38.	Castleford WF10 4SB	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> WF6 1TF, YO8 8LZ, WF2 7AL, LS9 0RJ, LS27 0EL; <b>GSF:</b> LS10 2BG, LS8 5DU, WF2 9LP, WF10 4SB, LS4 2AR
39.	Chelmsford CM2 6TG	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> SS14 3WB, CM1 2QX, CM7 2GB; <b>GSF:</b> CM2 6TG

40.	Cheltenham North GL51 9NZ	[70-80]%	[50-60]%	[60-70]%	[30-40]%	<b>ECP:</b> GL51 9FD, GL2 5HA; <b>GSF:</b> GL51 8PL, GL51 9NZ, GL4 3SJ, GL2 5DH
41.	Cheltenham South GL51 8PL	[60-70]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> GL2 5HA, GL51 9FD; <b>GSF:</b> GL4 3SJ, GL2 5DH, GL51 8PL, GL51 9NZ
42.	Chester CH1 4NS	[40-50]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> CH1 4LX, LL13 8DW; <b>GSF:</b> LL11 4YL, CH1 4NS
43.	Chichester PO19 7BJ	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> PO19 8ET, PO6 1US, GU27 1DW, BN14 8NQ, PO3 5FN, BN16 3HQ; <b>GSF:</b> PO3 6FH, BN14 8PQ, PO19 7BJ, BN17 5DF, GU27 1DW
44.	Chorley PR7 1NY	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> PR1 5DP, BL2 1HA, WN3 4DA, BB3 0DG; <b>GSF:</b> PR7 1NY, BB1 3AR, PR1 5DP, WN1 3DG
45.	Clitheroe BB7 1QD	[80-90]%	[50-60]%	[60-70]%	[30-40]%	<b>ECP:</b> BB3 0DG, BB9 5SP; <b>GSF:</b> BB1 3AR, BB7 1QD, BB5 1QX, BB11 4AA
46.	Colchester CO4 9XP	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> CO4 9QX; <b>GSF:</b> CO4 9XP
47.	Coventry CV6 5RY	[40-50]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> CV34 5WP, CV2 4QP; <b>GSF:</b> CV31 3LH, CV6 5RY
48.	Crewe CW1 6AE	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> ST5 0UU, CW1 6FA; <b>GSF:</b> ST4 1PU, CW1 6AE
49.	Croydon CR0 4TQ	[40-50]%	[5-10]%	[60-70]%	[30-40]%	<b>ECP:</b> KT2 5BQ, SE6 3BX, CR0 4RU, SW19 2QA, SM3 9BW, SW2 5DZ, CR0 3HH, KT9 2NY; <b>GSF:</b> SE26 5AQ, CR0 4TQ
50.	Daventry NN11 8RB	[50-60]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> NN5 5JH; <b>GSF:</b> NN11 8RB, NN1 2PN
51.	Derby North DE1 3QB	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> DE14 1PT, NG6 8YP, DE21 4AY; <b>GSF:</b> DE1 2SX, DE1 3QB
52.	Derby South DE1 2SX	[50-60]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> DE14 1PT, DE21 4AY; <b>GSF:</b> DE14 2WD, DE1 3QB, DE1 2SX
53.	Doncaster DN2 4NH	[90-100]%	[50-60]%	[90-100]%	[50-60]%	<b>ECP:</b> DN2 4LT; <b>GSF:</b> DN2 4NH
54.	Dover CT16 3PT	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> CT19 5DS; <b>GSF:</b> CT16 3PT

55.	Durham DH1 1TH	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> NE11 0TE, DH1 2RS, SR5 3RX; <b>GSF:</b> DH1 1TH, NE35 9LZ
56.	East Grinstead RH19 1XZ	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> RH10 9RX, RH1 2NL, RH10 9AN; <b>GSF:</b> RH19 1XZ
57.	Eastbourne BN22 8PW	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> BN23 6PQ; <b>GSF:</b> BN22 8PW
58.	Enfield EN3 7TY	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> IG8 8EY, N18 3BH, EN1 1SH, EN11 0NE, E3 2JE, N19 3QQ; <b>GSF:</b> EN3 7TY, IG8 8HF, N17 7RQ
59.	Exeter EX2 8RG	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> EX2 8HE, TQ12 3BN; <b>GSF:</b> EX2 8RG
60.	Farnham GU9 9LQ	[70-80]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> GU21 5JZ, GU14 8EH, GU35 0SJ, GU27 1DW, GU15 3DH, GU2 7YB; <b>GSF:</b> GU9 9LQ, GU27 1DW
61.	Frome BA11 4BG	[60-70]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> BA11 2RY, BA1 3JL, BA3 2BB; <b>GSF:</b> BA11 4BG
62.	Gateshead NE21 5TR	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> NE11 0TE, NE12 9SW, NE15 8NZ; <b>GSF:</b> NE21 5TR, NE12 9SZ
63.	Gloucester North GL4 3SJ	[60-70]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> GL51 9FD, GL2 5HA; <b>GSF:</b> GL4 3SJ, GL51 9NZ, GL2 5DH, GL51 8PL
64.	Gloucester South GL2 5DH	[60-70]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> GL51 9FD, GL2 5HA; <b>GSF:</b> GL51 9NZ, GL4 3SJ, GL51 8PL, GL2 5DH
65.	Goole DN14 6XF	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> YO8 8LZ; <b>GSF:</b> DN14 6XF
66.	Harlow CM20 2GF	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> EN11 0NE, CM20 2HW; <b>GSF:</b> EN3 7TY, CM20 2GF
67.	Harrogate HG1 4QE	[70-80]%	[50-60]%	[60-70]%	[30-40]%	<b>ECP:</b> HG3 1QW; <b>GSF:</b> HG1 4QE, LS21 3DT
68.	Haslemere GU27 1DW	[80-90]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> GU35 0SJ, GU27 1DW; <b>GSF:</b> GU9 9LQ, GU27 1DW
69.	Hastings TN38 9BA	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> TN38 9BB; <b>GSF:</b> TN38 9BA
70.	Hayes UB3 1AP	[60-70]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> KT2 5BQ, NW10 6PW, NW10 0UX, SL2 5AD, UB4 0UP, HA1 2HP,

						UB8 2DB, TW7 6GF, TW18 4LH; <b>GSF:</b> UB3 1AP, TW14 0LW
71.	Heathrow TW14 0LW	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> TW7 6GF, KT2 5BQ, UB8 2DB, KT16 9BQ, TW18 4LH, UB4 0UP; <b>GSF:</b> TW14 0LW, UB3 1AP
72.	Hemel Hempstead HP3 9AJ	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> AL1 5HT, HP2 7PT, WD23 2GD; <b>GSF:</b> WD18 7EN, HP3 9AJ, WD24 5RR
73.	Henfield BN5 9DF	[70-80]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> BN14 8NQ, RH15 9NB, RH10 9AN, RH10 9RX, BN3 5RY, BN16 3HQ; <b>GSF:</b> BN7 2FB, BN5 9DF, BN14 8PQ, BN17 5DF, RH19 1XZ, RH12 2NW, RH15 9RD, BN3 7BA
74.	High Wycombe HP13 7EJ	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> HP10 9RS, UB8 2DB, SL2 5AD, SL6 7BN; <b>GSF:</b> SL1 4QU, HP13 7EJ
75.	Horsham RH12 2NW	[70-80]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> RH10 9AN, RH15 9NB, RH10 9RX; <b>GSF:</b> RH12 2NW, RH15 9RD, BN5 9DF
76.	Huddersfield HD2 1AG	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> HX1 4PN, HD2 1XN; <b>GSF:</b> HD2 1AG
77.	Hull HU2 0JX	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> HU17 9DH, HU3 3EE; <b>GSF:</b> HU17 0JT , HU2 0JX
78.	Ipswich IP1 5BN	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> IP1 5NX; <b>GSF:</b> IP1 5BN
79.	Kidderminster DY11 7AR	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> B60 3DX, B62 8DF, DY5 1TX, WR4 9PT; <b>GSF:</b> B60 3DX, DY11 7AR, B62 8HN, WR4 9PT
80.	Leamington Spa CV31 3LH	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> CV34 5WP, CV2 4QP; <b>GSF:</b> CV31 3LH, CV6 5RY
81.	Leeds East LS8 5DU	[70-80]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> LS13 4PN, LS27 0EL, BD4 8AL, LS9 0RJ; <b>GSF:</b> LS8 5DU, LS10 2BG, LS4 2AR
82.	Leeds South LS10 2BG	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> WF6 1TF, LS27 0EL, BD4 8AL, WF2 7AL, LS9 0RJ, LS13 4PN; <b>GSF:</b>

						LS4 2AR, LS8 5DU, WF2 9LP, LS10 2BG
83.	Leeds West LS4 2AR	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> LS9 0RJ, BD4 8AL, LS27 0EL, LS13 4PN; <b>GSF:</b> LS10 2BG, BD4 7EA, LS4 2AR, LS8 5DU
84.	Leicester LE4 0JD	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> LE11 1HL, LE2 7SZ; <b>GSF:</b> LE4 0JD
85.	Letchworth SG6 1JZ	[40-50]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> SG1 2BH; <b>GSF:</b> SG6 1JZ, LU1 3XJ
86.	Lewes BN7 2FB	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> BN3 5RY, RH15 9NB; <b>GSF:</b> RH15 9RD, BN7 2FB, BN3 7BA
87.	Lincoln LN6 7QY	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> LN2 4JB, LN6 7UB; <b>GSF:</b> LN6 7QY
88.	Littlehampton BN17 5DF	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> PO19 8ET, BN16 3HQ, BN14 8NQ; <b>GSF:</b> PO19 7BJ, BN14 8PQ, BN17 5DF
89.	Liverpool - Aintree L9 5AY	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> L5 9YN, CH41 9HH; <b>GSF:</b> L9 5AY, L5 9UB
90.	Liverpool - Bootle L5 9UB	[50-60]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> L5 9YN, CH41 9HH; <b>GSF:</b> L5 9UB, L9 5AY, CH43 3DS
91.	Llandudno LL31 9PN	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> LL22 7LA; <b>GSF:</b> LL31 9PN
92.	Llanelli SA14 8LQ	[80-90]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> SA4 9WG, SA7 9AH; <b>GSF:</b> SA6 8JG, SA14 8LQ
93.	Luton LU1 3XJ	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> HP2 7PT, AL1 5HT, LU1 1XL, SG1 2BH, LU7 4TN; <b>GSF:</b> SG6 1JZ, HP3 9AJ, LU1 3XJ, AL7 1EW
94.	Macclesfield SK10 1LT	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> SK6 2RF, SK4 2JZ; <b>GSF:</b> M22 4QE, SK10 1LT
95.	Maidstone ME15 6HA	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> ME2 4LT, ME15 9HF, ME20 7FE; <b>GSF:</b> ME15 6HA, ME10 2PD, ME2 4LY
96.	Malvern WR14 1GF	[60-70]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> WR4 9PT; <b>GSF:</b> WR4 9PT, WR14 1GF

97.	Manchester - Dukinfield SK16 4UP	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> SK4 2JZ, SK6 2RF, OL9 7PN; <b>GSF:</b> OL1 3PA, SK16 4UP
98.	Manchester - Trafford Park M17 1QR	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> SK4 2JZ, M45 8FJ, M17 1DB; <b>GSF:</b> M17 1QR, M22 4QE
99.	Manchester - Wythenshawe M22 4QE	[40-50]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> SK4 2JZ, M17 1DB, SK6 2RF; <b>GSF:</b> M22 4QE, M17 1QR
100.	Mansfield NG19 9BG	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> S41 7JL, NG6 8YP, NG19 7JY; <b>GSF:</b> NG19 9BG
101.	Merthyr CF48 4XA	[20-30]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> CF37 5UA; <b>GSF:</b> CF48 4XA
102.	Middlesbrough TS6 6RU	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> TS18 3QX; <b>GSF:</b> TS6 6RU
103.	Milton Keynes MK1 1EQ	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> MK6 4AE, LU7 4TN, MK15 8HQ; <b>GSF:</b> MK1 1EQ
104.	Neath SA10 7NH	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> SA7 9AH, SA4 9WG; <b>GSF:</b> SA6 8JG, SA10 7NH
105.	Newcastle NE12 9SZ	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> NE11 0TE, NE12 9SW, NE15 8NZ; <b>GSF:</b> NE35 9LZ, NE12 9SZ, NE21 5TR
106.	Newport NP19 4SL	[50-60]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> CF24 5HF, NP19 4SL; <b>GSF:</b> BS11 9YE, CF24 1RF, CF14 4QA, NP19 4SL
107.	Newquay TR9 6TL	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> TR4 9LD; <b>GSF:</b> TR9 6TL
108.	Northallerton DL6 2XE	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> YO7 3TA; <b>GSF:</b> DL6 2XE
109.	Northampton NN1 2PN	[40-50]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> NN5 5JH; <b>GSF:</b> NN11 8RB, NN1 2PN
110.	Northwich CW9 7LU	[40-50]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> WA2 8HQ, WA8 0SS; <b>GSF:</b> WA5 0LS, CW9 7LU

111.	Norwich NR6 6RA	[70-80]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> NR3 2AW, NR4 6DG; <b>GSF:</b> NR6 6RA
112.	Nottingham NG2 3GG	[40-50]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> NG7 2PX, NG6 8YP; <b>GSF:</b> NG2 3GG
113.	Oldham OL1 3PA	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> OL16 5QX, OL9 7PN; <b>GSF:</b> SK16 4UP, OL16 5RD, OL1 3PA
114.	Otley LS21 3DT	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> HG3 1QW, LS13 4PN, BD4 8AL; <b>GSF:</b> LS21 3DT
115.	Oxford - Abingdon OX14 5JX	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> OX14 1TR, OX4 6HE; <b>GSF:</b> OX14 5JX, OX4 2RD
116.	Oxford - Cowley OX4 2RD	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> OX26 4PL, OX14 1TR, OX4 6HE; <b>GSF:</b> OX14 5JX, OX4 2RD
117.	Penryn TR10 9EP	[70-80]%	[50-60]%	[60-70]%	[30-40]%	<b>ECP:</b> TR4 9LD; <b>GSF:</b> TR14 0PY, TR10 9EP
118.	Peterborough PE1 5WS	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> PE1 5HE; <b>GSF:</b> PE1 5WS
119.	Plymouth North PL7 1RF	[80-90]%	[50-60]%	[60-70]%	[30-40]%	<b>ECP:</b> PL12 6LD, PL7 1RF; <b>GSF:</b> PL7 1RF, PL12 6LD, PL4 0SF
120.	Plymouth South PL4 0SF	[80-90]%	[50-60]%	[60-70]%	[30-40]%	<b>ECP:</b> PL7 1RF, PL12 6LD; <b>GSF:</b> PL7 1RF, PL12 6LD, PL4 0SF
121.	Poole BH12 3PF	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> BH11 8JR, BH12 3LL, BH23 3PE; <b>GSF:</b> BH8 8BH, BH12 3PF
122.	Portsmouth PO3 6FH	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> PO16 8XG, PO6 1US, PO3 5FN; <b>GSF:</b> PO3 6FH
123.	Preston PR1 5DP	[70-80]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> BB3 0DG, PR1 5DP; <b>GSF:</b> PR1 5DP, BB1 3AR, PR7 1NY
124.	Reading RG2 0AU	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> RG41 2QJ, RG1 8LX, GU15 3DH, RG2 0DY; <b>GSF:</b> RG2 0AU
125.	Redditch B98 7SE	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> B11 3DJ, B30 3HP, B60 3DX; <b>GSF:</b> B60 3DX, B90 4NY, B98 7SE
126.	Rhyl LL18 2AB	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> LL22 7LA; <b>GSF:</b> LL18 2AB
127.	Rochdale OL16 5RD	[70-80]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> OL16 5QX, OL9 7PN, M45 8FJ; <b>GSF:</b> BL9 6AQ, OL16 5RD, OL1 3PA



128.	Romford RM11 2SJ	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> RM3 8AA, IG8 8EY, IG11 7BG; <b>GSF:</b> RM20 3FH, IG8 8HF, RM11 2SJ
129.	Saltash PL12 6LD	[80-90]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> PL7 1RF, PL15 7ED, PL12 6LD; <b>GSF:</b> PL4 0SF, PL7 1RF, PL12 6LD
130.	Sheffield S9 5EX	[50-60]%	[5-10]%	[60-70]%	[30-40]%	<b>ECP:</b> S8 9UB, S6 2HH, S26 5NU, S61 4RN, S9 3WZ; <b>GSF:</b> S9 5EX
131.	Shrewsbury SY1 4YA	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> SY1 3TG; <b>GSF:</b> SY1 4YA
132.	Sidcup DA14 5BL	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> RM20 3ED, BR5 3HP, SE18 5PQ, SE6 3BX, DA1 4QX; <b>GSF:</b> RM20 3FH, DA16 3DP, DA14 5BL, SE26 5AQ
133.	Sittingbourne ME10 2PD	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> ME2 4LT, ME15 9HF; <b>GSF:</b> ME2 4LY, ME15 6HA, ME10 2PD
134.	Skipton BD23 2QR	[70-80]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> BD21 5JT, BB9 5SP; <b>GSF:</b> BD23 2QR
135.	Slough SL1 4QU	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> UB4 0UP, SL2 5AD, HP10 9RS, SL6 7BN, TW18 4LH, UB8 2DB, KT16 9BQ; <b>GSF:</b> SL1 4QU, HP13 7EJ, TW14 0LW, UB3 1AP
136.	Southampton North SO50 4NT	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> SO15 0LA, PO16 8XG, SO53 4BZ; <b>GSF:</b> SO50 4NT, SO40 9LA
137.	Southampton West SO40 9LA	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> SO15 0LA, SO53 4BZ; <b>GSF:</b> SO50 4NT, SO40 9LA
138.	Southend SS2 5TE	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> SS14 3WB, SS2 6LG; <b>GSF:</b> SS2 5TE
139.	Southport PR8 5RG	[50-60]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> FY4 4ND; <b>GSF:</b> L9 5AY, FY4 2RP, PR8 5RG
140.	St. Helens WA9 5GZ	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> WA9 5JD, WA2 8HQ, WA8 0SS; <b>GSF:</b> WA8 8FZ, WA9 5GZ, WA5 0LS
141.	Staples Corner NW2 7JA	[40-50]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> NW10 6PW, NW10 0UX, N19 3QQ, HA1 2HP, WD6 2BT; <b>GSF:</b> NW2 7JA, N17 7RQ
142.	Stoke ST4 1PU	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> ST5 0UU, CW1 6FA; <b>GSF:</b> CW1 6AE, ST4 1PU

143.	Strood ME2 4LY	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> RM20 3ED, ME2 4LT, ME15 9HF, DA11 0DA, ME20 7FE; <b>GSF:</b> RM20 3FH, ME10 2PD, ME15 6HA, ME2 4LY
144.	Sunderland NE35 9LZ	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> NE12 9SW, NE11 0TE, SR5 3RX; <b>GSF:</b> NE12 9SZ, NE35 9LZ
145.	Swansea SA6 8JG	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> SA7 9AH, SA4 9WG; <b>GSF:</b> SA6 8JG, SA10 7NH, SA14 8LQ
146.	Swindon SN3 4NS	[90-100]%	[50-60]%	[90-100]%	[50-60]%	<b>ECP:</b> SN5 8WQ; <b>GSF:</b> SN3 4NS
147.	Sydenham SE26 5AQ	[40-50]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> SW19 2QA, CR0 4RU, SE18 5PQ, BR5 3HP, SE6 3BX, CR0 3HH, SW2 5DZ, E3 2JE; <b>GSF:</b> CR0 4TQ, SE26 5AQ, DA14 5BL, DA16 3DP
148.	Taunton TA2 8QY	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> TA2 8RX, TA6 4DH; <b>GSF:</b> TA2 8QY
149.	Telford TF7 4NZ	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> TF3 3AY; <b>GSF:</b> TF7 4NZ
150.	Thanet CT9 5TA	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> CT10 2PR; <b>GSF:</b> CT9 5TA
151.	Thurrock RM20 3FH	[50-60]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> DA1 4QX, DA11 0DA, RM20 3ED; <b>GSF:</b> DA16 3DP, DA14 5BL, RM11 2SJ, RM20 3FH
152.	Torquay TQ2 7QL	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> TQ12 3BN, TQ1 4RY; <b>GSF:</b> TQ2 7QL
153.	Tottenham N17 7RQ	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> WD6 2BT, N19 3QQ, N18 3BH, EN1 1SH, E3 2JE, IG8 8EY; <b>GSF:</b> N17 7RQ, IG8 8HF, EN3 7TY, NW2 7JA
154.	Tunbridge Wells TN2 3EH	[40-50]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> TN2 3EN; <b>GSF:</b> TN2 3EH
155.	Wakefield WF2 9LP	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> LS9 0RJ, LS27 0EL, WF6 1TF, WF2 7AL; <b>GSF:</b> LS10 2BG, WF2 9LP
156.	Warrington WA5 0LS	[50-60]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> WA9 5JD, WA8 0SS, WN3 4DA, WA2 8HQ; <b>GSF:</b> WA8 8FZ, CW9 7LU, WN1 3DG, WA5 0LS, WA9 5GZ

157.	Watford North WD24 5RR	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> HP2 7PT, WD23 2GD, WD6 2BT, AL1 5HT, HA1 2HP; <b>GSF:</b> WD18 7EN, WD24 5RR, HP3 9AJ
158.	Watford South WD18 7EN	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> WD6 2BT, HA1 2HP, WD23 2GD; <b>GSF:</b> WD18 7EN, WD24 5RR, HP3 9AJ
159.	Welling DA16 3DP	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> BR5 3HP, SE6 3BX, IG11 7BG, E3 2JE, RM20 3ED, DA1 4QX, SE18 5PQ; <b>GSF:</b> DA16 3DP, SE26 5AQ, DA14 5BL, RM20 3FH
160.	Welwyn Garden City AL7 1EW	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> HP2 7PT, AL1 5HT, WD6 2BT, SG1 2BH, EN11 0NE; <b>GSF:</b> AL7 1EW, LU1 3XJ
161.	Weston-super- Mare BS24 9ES	[50-60]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> BS11 8DT, TA6 4DH, BS23 3YH, NP19 4SL, CF24 5HF; <b>GSF:</b> NP19 4SL, CF14 4QA, BS3 2LD, CF11 8BA, CF24 1RF, BS11 9YE, BS24 9ES
162.	Weymouth DT3 4FL	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> DT3 4FL; <b>GSF:</b> DT3 4FL
163.	Widnes WA8 8FZ	[50-60]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> WA2 8HQ, CH41 9HH, L5 9YN, WA8 0SS, WA9 5JD; <b>GSF:</b> WA5 0LS, CH43 3DS, WA9 5GZ, L5 9UB, L9 5AY, WA8 8FZ
164.	Wigan WN1 3DG	[60-70]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> WN3 4DA; <b>GSF:</b> PR7 1NY, WN1 3DG
165.	Wirral CH43 3DS	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> CH41 9HH, L5 9YN; <b>GSF:</b> L5 9UB, CH43 3DS
166.	Wolverhampton WV2 2HU	[60-70]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> WS2 9LZ, WS11 0XE, WV11 3DR, DY5 1TX, B66 1NJ; <b>GSF:</b> B66 1NU, WV2 2HU, B62 8HN
167.	Woodford IG8 8HF	[50-60]%	[10-20]%	[60-70]%	[30-40]%	<b>ECP:</b> RM3 8AA, SE18 5PQ, E3 2JE, N18 3BH, IG8 8EY, IG11 7BG, EN1 1SH, N19 3QQ; <b>GSF:</b> RM11 2SJ, N17 7RQ, IG8 8HF, EN3 7TY
168.	Worcester WR4 9PT	[60-70]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> WR4 9PT, B60 3DX; <b>GSF:</b> DY11 7AR, B60 3DX, WR14 1GF, WR4 9PT

169.	Worthing BN14 8PQ	[70-80]%	[40-50]%	[60-70]%	[30-40]%	<b>ECP:</b> BN16 3HQ, BN14 8NQ, BN3 5RY; <b>GSF:</b> BN5 9DF, BN14 8PQ, BN3 7BA, BN17 5DF
170.	Wrexham LL11 4YL	[50-60]%	[20-30]%	[60-70]%	[30-40]%	<b>ECP:</b> CH1 4LX, LL13 8DW; <b>GSF:</b> CH1 4NS, LL11 4YL
171.	Yeovil BA22 8XG	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> BA20 2PJ; <b>GSF:</b> BA22 8XG
172.	York YO30 4US	[60-70]%	[30-40]%	[60-70]%	[30-40]%	<b>ECP:</b> YO30 4WU; <b>GSF:</b> YO30 4US