

107 High Street  
Credton  
Devon EX17 3LF

Mr Keith Garside  
The Planning Department  
Mid Devon District Council  
Phoenix House  
Phoenix Lane  
Tiverton EX16 6PP

24<sup>th</sup> January 2007

Dear Mr Garside

**06/02670/OUT - Land To South Of Exeter Road, Wellparks, Credton, Devon  
EX17 3PP**

I am strongly against the proposed Tesco Store and related development for the following reasons:-

**Size**

The scheme with gross floor area of 5519 sq m is far too big for Credton. Credton already has a supermarket with a 1412 sq m area with proposals to increase it to 2000 sq m. The local plan states : ***Accordingly, it is proposed to pursue the development of a foodstore of about 2000 sqm in the town.*** This development is far bigger and is not 'in town' It is out of town. The size of the proposed store represents a near doubling of all the retail shops in the High Street.

The size of the site itself is huge – it measures approx ½ mile from one end to the other. A nice welcome sight for people coming into Credton being faced with an industrial estate another petrol station and a massive Tesco. Is this what Credton wants?



The view coming into Credton from Exeter (Near Downs Lodge)  
Rural Credton or Industrial Credton?

As can be seen in the above photograph the view coming into Crediton is very attractive. This view will be lost forever if the development goes ahead.

### Location

Tesco's Travel Plan states:-

***3.4.1 The location of the site means that it is within easy walking distance (less than 500metres) of the nearby residential areas of Crediton.***

The location is out of town. It is 1 mile from the center of town, this makes it inaccessible for more than half the towns population except by car, it is not within easy walking distance.

Tesco's Travel Plan states:-

***4.4.2 The movement of large bulky goods and heavy shopping is often stated as a reason for travelling to a store by private vehicle. To combat the need for private car use a free phone service will be provided in the store to allow customers to easily arrange a taxi trip home. All taxi firms used by the free service are vetted by Tesco to ensure that prices remain competitive.***

I cannot see the difference in car use whether it be a taxi or a private car, both need to make a round trip.

***7.12 of the Local plan states: A foodstore proposal must satisfy the "sequential test" and other policy requirements, meaning that sites in the town centre are considered first, followed by sites within walking distance of the town centre, and only then sites further away.***

There is currently a Somerfield store much closer to the town center with plans to increase its size, which surely is a much more suitable alternative.

### Landscaping

It is situated too close to the road making it impossible to hide with a planting scheme. It would be impossible to hide an aircraft hanger sized building.

### Site use

The site is not allocated for retail or housing. CRE8 of the local plan is for B1, B2, B8 and is 3 hectares only not 8.33 hectares as proposed.

### Flood risk

The proposed site has been enlarged. CRE8 has 3 hectares allocated due to flood risk. This application is over development of the floodplain as its is 8.33 hectares.

### Traffic/Pollution

Tesco's Transport Assessment states:-

***5.6.2 Notwithstanding the existing services the development of a major traffic generator on the periphery of the town means that the existing routes and services need to be considered in order to be better integrated into the various land uses.***

Tesco's are admitting that their development will be a major traffic generator.

Tesco's Air Quality Impact Assessment states:-

***7.1.2 By 2009, the first full year the proposed supermarket is assumed to be completed, air quality is predicted to improve, largely as a result of national pollution abatement policies which result in vehicles becoming cleaner in the future.***

How will existing vehicles become cleaner in the next 2 years, will everyone be able to afford a new car by then?

The statement below shows what huge impact the development will have on the road network:-

Tesco's Transport Assessment states:-

**6.4.1 The following tables show the total person trips for car driver and car passenger for each element of the development. Under the base modal split scenario, the development generates a total of 10,820 car driver person trips and 4,395 car passenger person trips daily. The Tesco store is by far the largest generator accounting for 87% of the daily total car driver person trips.**

Pollution along Exeter Road will not be lowered by the introduction of a bus service to the site. As Tesco's themselves admit that public transport travel will be very low relative to car usage as per their statement below:-

Tesco's Transport Assessment states:-

**6.8.1 It can be seen from the above tables that the development will be a significant generator of person trips. Under base conditions car driver is by far the most dominant mode of person trip travel. Walking and cycling person trips are relatively low and public transport travel also low.**

Tesco's statement below says that air quality deterioration will be offset by the use of a town bus service!! This is clearly misleading information, as it will have no impact at all on the overall situation.

Tesco's Air Quality Impact Assessment states:-

**7.1.10 National planning policy allows development in AQMAs even where there is deterioration in air quality, and encourages the use of mitigation to allow development to proceed. The proposals incorporate mitigation in the form of an extended Crediton town bus service. This measure is identified as an important element of the Crediton Air Quality Action Plan.**

Tesco's Air Quality Impact Assessment states:-

**2.6.1 The Tesco development will fund one of the key measures identified in the Action Plan (measure reference 5) i.e. the extension of the town centre bus service.**

If the Tesco development goes ahead surely we will need a new Air Quality Action Plan!! In fact if one is to read the Air Quality Action Plan it can be seen that an Extended Crediton Town Bus Service has an Air Quality Impact of **LOW**.

There is nothing in the Air Quality Action Plan that can sufficiently help the pollution levels in Exeter Road except a link road or bypass. If a link road is built and also the Tesco store I believe that one would offset the other in terms of net pollution and the situation will be back as it is now – regular breaches of the allowable limits set by the Air Quality Regulations (England) (Wales) 2000 and in the Air Quality (England) (Wales) (Amendment) Regulations 2002. As stated in Tesco's document a link road would only reduce traffic in Exeter Rd by 10%.

Tesco's Transport Assessment states:-

**8.5.2 In Scenario 6, traffic flows on Exeter Road are reduced by 3.3% eastbound and 13.4% westbound as a result of the link road. In the PM peak traffic is lowered by 22.2% eastbound and 3.8% westbound on the A377. The overall Daily traffic along the A377 is reduced by 9.3% eastbound and 10.0% westbound as a result of the link road.**

I am sure their store will increase traffic by at least that amount as detailed in the following paragraph:-

**Tesco's Transport Assessment states:-**

**7.7.14 For the A377 West the AM increase is 17% in the AM and 16% in the PM. The daily increase is 22%.**

A 22% increase in traffic through Exeter road will be an impossible situation to deal with in terms of additional pollution.

Tesco's Transport Assessment states:-

**7.9.5 Overall vehicle kilometres on the A377 will be reduced as a result of the new store as Crediton residents will no longer need to travel to Exeter or Okehampton for food retail trips**

But all the vehicle kilometres will be compressed into one small zone – Exeter Road. In most cases shopping trips in Exeter are combined with other trips already on the network i.e. work etc.

Tesco's Transport Assessment Report says:

**9.2.4 The results show that the development will significantly increase the traffic flows on the local road network under worst-case traffic conditions. However, not all trips will be new trips, a large proportion will be linked trips and passer-by trips that are already on the network. In reality, traffic flow increases will be much lower as the sustainable measures proposed for the development are implemented and begin to take effect. The impact on the highway network will be reduced as more people use the bus, walk and cycle as opposed to using the private car. However, the assessment has shown that the capacity of junctions will remain below the threshold and will be able to continue to operate efficiently even under worst-case traffic conditions.**

They are relying on sustainable measures to work, if they don't then Crediton is in for a nightmare. Due to its location I firmly believe that they won't work. In fact it is admitted in their documentation that bus/walk/cycle use will be low.

Tesco's Transport Assessment states:-

**9.2.5 It is therefore concluded that the development results in an acceptable impact on the local highway network.**

I totally disagree with the above statement as it is clearly stated in their figures this development will have a huge impact on the local network.

### **General**

PPS6 states that "the core principle underpinning planning" is "facilitating and promoting sustainable and inclusive patterns of development." In terms of town centre planning this means "the creation of vital and viable town centres," in order to ensure "successful, thriving, safer and inclusive communities."

The provisions of PPS6 are designed to protect and enhance town centres by encouraging new development to be located as centrally as possible and imposing strict limits on the circumstances in which developments can be allowed outside the centre. The store must be of an appropriate scale for the town.

The Mid Devon Local Plan states:

2.5.2 Policy S6 (General Development Requirements) states that permitted development will need to meet the following criteria with regard to transport issues:

- *In the case of developments with a significant impact on travel, they are located where the majority of trips involved can be undertaken without use of the private car*
- *Locabads have sufficient capacity to cater safely for additional road traffic arising*
- *The operation of the site, including any additional road traffic arising, will not be detrimental to the amenity, health or safety of nearby occupants or the wider environment through noise, smell, dust, glare, light pollution, heat, vibration, fumes or other forms of pollution or nuisance.*

This site fails on all points.

Page 23 of the Core Strategy 2026 states:-

*A good range of jobs in urban and rural areas*

*Profitable and expanding local businesses*

*Attractive, lively and successful town centres*

*Tourist expenditure which benefits the whole district*

*High quality design in new developments*

***Clean air and water***

*Wildlife, heritage and history is valued and protected*

*Attractive countryside providing for biodiversity and employment*

*Social and environmental benefits of development are optimised*

*Developments use land, energy and resources efficiently*

*Waste is minimised and recycling rates are high*

*Public transport, walking and cycling are encouraged*

***Floodplains remain undeveloped***

2.3.1 Planning Policy Statement: Planning and Pollution Control (PPS23) (2004) sets out the Government's current policies on air quality and planning, and identifies the consideration of the quality of air and potential air quality impacts arising from development as being a material planning consideration.

## **GROCERIES MARKET INVESTIGATION REPORT**

As can be seen in the recent report the following paragraph highlights the increase in traffic generated by large supermarkets:-

*83. What is clear to us already, however, is that the apparent consumer benefits in terms of low prices, convenience and product variety that result from competition between grocery retailers may involve other costs in terms of environmental effects (eg planning and development, increased production of waste, increase in road traffic), changes affecting the UK agricultural industry (through international sourcing), and more remotely, affecting the balance of dietary health (greater availability of cheaper but processed foods).*

Below Cost selling practices of large supermarkets, highlights the loss of smaller retailers in high streets as detailed in the report:-

*Below-cost selling*

133. *In general, we would expect consumers to benefit from lower prices, but below-cost selling may raise concerns if:*

- (a) it is part of a predatory strategy aimed at excluding rivals;*
- (b) it unintentionally leads to smaller grocery retailers or specialist stores exiting and has a harmful effect on consumers; or*
- (c) it misleads consumers into thinking that the prices of all products sold by a grocery retailer are lower than is really the case.*

It is clear that this has a detrimental effect on local shops a detailed in the following paragraph:-

*139. The exit of smaller grocery retailers and specialist stores may be an unintended consequence of below-cost selling rather than part of a predatory strategy. This is because major grocery retailers may be able to sell some products below cost due to their ability to sell other products at higher prices. Smaller stores typically sell fewer products and so are less able to support a below-cost selling strategy. Further, some of the products that are typically sold below cost, such as alcohol, may be particularly important sources of revenue for these smaller retailers. The exit of smaller retailers as a result of this below-cost selling would reduce the number of stores at which consumers could choose to shop. This has the potential adversely to affect consumers.*

I would hope that the council will not be swayed by such things detailed in the report as has been seen recently in large applications in Mid Devon:-

*Use of the planning system to gain a competitive advantage*

*158.*

- the use of section 106 agreements, which allow 'planning gains' proposed by a developer to be taken into account in the decision to grant planning approval;*
- the threat of appeal against local planning authority decisions;*

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

1. **Local choice is eroded** as smaller, independent shops struggle to compete with the supermarkets. Between 1997 and 2002 more than 13,000 specialist stores around the UK – including newsagents, Post Offices, grocers, bakers, butchers - closed. The loss of local, independent shops can have serious impacts in terms of access to food, particularly for people on lower incomes or those who don't have use of a car.

2. **Money is siphoned away** from local communities and towards shareholders and distant corporations. A Friends of the Earth study of local food schemes found that on average just over half of business turnover was returned to the local economy – compared to as little as five per cent for supermarkets.

3. **Traffic congestion increases.** The distribution systems used by supermarkets and the location of out of town stores generate large amounts of traffic. Recent work for the Department for Environment, Food and Rural

Affairs (Defra) suggests that car use for shopping results in costs to society of more than £3.5 billion per year, from traffic emissions, noise, accidents, congestion and accidents.

4. **Local jobs are lost.** Supermarket claims that new stores bring in jobs fail to consider the wider picture of independent retailer bankruptcies. A 1998 study by the National Retailer Planning Forum (NRPF) examining the employment impacts of 93 superstore openings between 1991 and 1994 found that they resulted in a net loss of more than 25,000 jobs or 276 per store opened.

5. **Food and packaging waste is generated.** Packaging now makes up nearly a quarter of household waste. A shocking 35-40 per cent of all household waste which ends up in landfill begins life as a purchase from one of the big five supermarkets.

6. **Suppliers are exploited and the environment is damaged.** Supermarkets use their market dominance to exploit suppliers and farmers and drive down prices, thus ensuring that environmentally damaging practices are continued both in the UK and overseas.

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

**PPS6 states that:**

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

PPS6, Paragraph 2.43

**PPS6 states that:**

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

PPS6, Paragraph 2.61

**And:**

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

PPS6, Paragraph 3.21

**PPS6 states that:**

*In selecting appropriate sites for allocation, local authorities should have regard to:*

i) whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car; and  
 ii) the impact on car use, traffic and congestion.

PPS6, Paragraph 2.49

**And:**

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

PPS6, Paragraph 3.25

**And:**

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

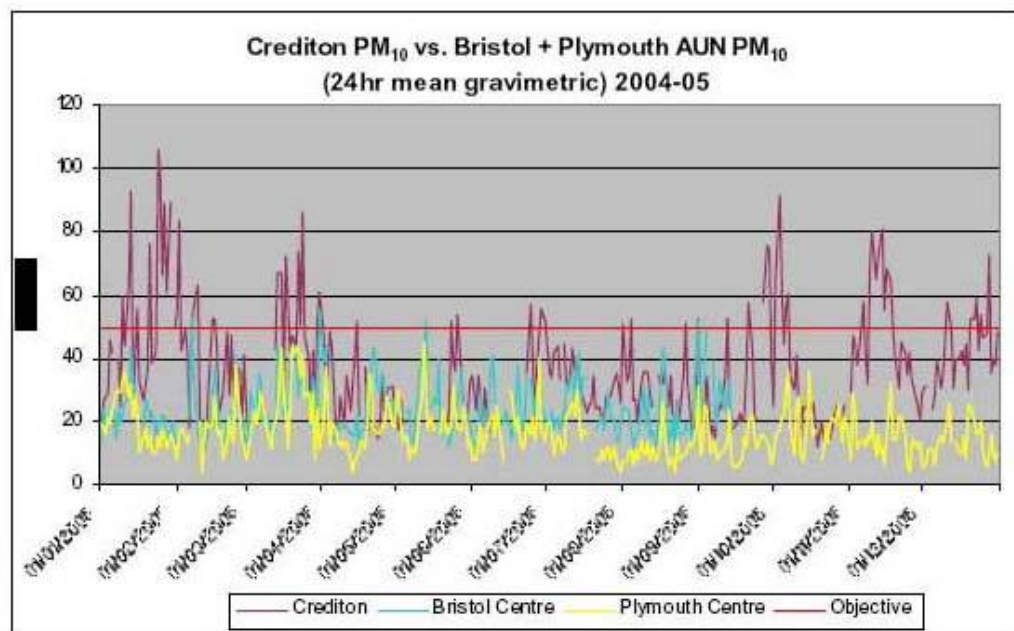
PPS6, Paragraph 3.27

**PPS6 states that:**

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

PPS6, Paragraph 3.9

**Figure 36: Crediton vs Bristol and Plymouth AUN sites PM<sub>10</sub> (2004-2005)**



Creditons Air Quality regularly exceeds the objective as seen in the above graph from the MDDC Detailed Assessment Report 2006.

Finally I believe that Air Quality is the most important issue with this application and the following report highlights the problems for the future:

Recently released figures from the Department for Environment, Food And Rural Affairs indicate that levels of air pollution increased during 2006, reversing a general pattern of decline.



*“The new figures indicate that the improvements in air quality we’ve seen since 1993 have bottomed out and may in fact be reversing”, said NSCA Policy Officer Ed Dearnley, “With climate change increasingly leading the environmental agenda we have to remember that air quality is still a significant health issue in many parts of the country, and that policy decisions should be used to produce benefits in both areas.*

I hope I have not overwhelmed you with information but this is a very large and important application, which affects the future of Crediton, and I hope that you will consider the facts and I urge you to refuse planning permission for the above application.

Yours sincerely

John Rochester