

Cllr  
Planning Committee  
North Norfolk District Council  
Holt Road  
Cromer  
NR27 9EN

7<sup>th</sup> October 2010

Dear Cllr

**Tesco & GCP Applications: Planning Committee 14<sup>th</sup> October**

CPRE have been actively involved with the applications for a supermarket in Sheringham since that of Tesco in the summer of 2003. We have all been engaged in a long and torturous process. However we ask Councillors to stand back from this, and consider the applications afresh, both as regards the national planning policies, and related issues and objectives.

In this regard, it is vital to take full account of the fact that from the 29<sup>th</sup> December 2009 there was a very important change in the planning regime. This was the replacement of national policy PPS6 by PPS4. PPS6, and its predecessor versions, saw supermarket applications essentially with their 'own' exclusive planning regime, uniquely reliant on complex specialist retail assessments which very heavily influenced planning decisions.

With PPS4 this has been much diluted by a new regime which applies to all forms of development (except housing, which retains its unique status in PPS3). While PPS4 takes a broader view across all development, it also provides a greatly strengthened Impact Assessment. Impacts can be positive, neutral or negative. The tests set out in PPS4 provide a structured means to evaluate the impact of a range of factors, and make a judgement on the overall impact of an application, and its acceptability or not.

The reason that we emphasise this point is that these broad changes have not been well assimilated. As you are all aware, the outcome of the July 2008 public inquiry was that the Inspector decided that the over-riding consideration for her refusal of the Tesco appeal was the **unacceptable impact** that their proposal would have on the tourist and market town of Sheringham.

This was a landmark decision, and greatly welcome. Further, it was made under the defunct PPS6, which had a much less tough and demanding impact assessment. You are now asked to judge the Tesco and GCP applications using the more wide ranging and stringent PPS4 tests. We therefore ask you to set aside the Tesco 'salami-slice' approach to justifying their application on the basis that it just might have tipped the balance enough to satisfy the Inspector in 2008. We add that, in overall terms, the application 09/0818 saw no intrinsic change in size and impact from that presented at the Inquiry; and the 'slices' made by the amended version, and the 'new' application, are too thin to register with any significance.

Turning to the wider national issues, over a few decades we have witnessed vast changes. We have moved from times of food scarcity and an acquaintance with hunger to one of abundance and huge choice; plus high levels of convenience, and purchased at costs which represent a greatly reduced proportion of our income. This has however not been without some major problems which need to be addressed.

We have pushed the natural environment, our own and in other countries, to the limits and beyond. We have a huge dependence on fossil fuel at all stages of the food chain - growing the food, processing, packaging and distribution. Malnutrition does not arise from a lack of food, but in western countries through a lack of awareness combined with over indulgence which results in high levels of obesity and diseases related to dietary intake. In addition the amount of food we waste has been estimated as reaching levels of 30%.

The hallmark of the 21<sup>st</sup> century should not be to 'carry on regardless', but to seek to address these issues in every way we can. There is support to do this in planning policies. PPS4 has an emphasis on economic growth, but sustainable economic growth: *'growth which can be sustained and is within environmental limits, but also enhances environmental and social welfare and avoids greater extremes if future economic cycles'*. In determining applications local authorities are required to *'weigh market and economic information alongside environmental and social information'*.

The ethos underlying the Greenhouse Community Project (GCP) application takes these wider social environmental considerations into good account, and could set a model for how we seek to correct the imbalances and faults within the food chain.

We set out below the CPRE Summary and Conclusions on the applications. On the basis of our conclusions we urge Councillors to reject the Tesco applications and approve that of the Greenhouse Community Project. This has been arrived at on the basis of consideration of the PPS4 Impact Assessment policies EC10 and EC16, and the sequential test. We will separately e-mail yourself and other planning committee members with our full response, as you may wish to see the detail behind the planning case we make.

Yours sincerely

Ian Shepherd  
Policy Co-ordinator,  
CPRE Norfolk

# CPRE NORFOLK SUMMARY AND CONCLUSIONS

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## The CPRE response sets out:

- an overview of the key changes brought by PPS4 in replacing PPS6
- a comparison of the Tesco application 09/0818, the amended 09/0818, and the new application 10/0920
- comments on information in the amended and new Tesco applications
- an evaluation of the Tesco and Community Greenhouse Project applications against PPS4, firstly the Sequential Test (Policy EC15), then the Impact Test (Policies EC10, EC16); the latter then summarised in tabular form in a side-by-side comparison.

## CPRE conclude that:

1. Tesco fail to properly assimilate PPS4 in their planning and retail assessments. In particular, that PPS4 greatly strengthened the Impact Assessment tests in EC10, EC16
2. There are only minor changes between the Tesco applications 09/0818, amended 09/0818 and the new application 10/0920. The main aim is to strengthen their position on the sequential test by creating more public realm space adjacent to the store. This however still leaves a narrow corridor to complete the pedestrian access, which impairs the physical and visual connectivity of store and town centre.
3. The GCP application is for an integrated set of buildings and facilities to achieve social, environmental and economic objectives. With the necessity to be on one site, there is no more central site that could 'do the job'. As such it meets the requirements of the sequential test.
4. The GCP store design is such that it softens the impact of The Splash leisure centre, and makes an improved transition from urban fringe to the open countryside. It improves the function of the area by placing retail next to leisure, and attracting customers of both to make use of the Food Academy and other facilities.
5. The Tesco design is an improvement over that presented at the Inquiry, but inevitably with its bulk and scale, still does not sit well with the character of the town. The function of the area suffers from the loss of affordable housing, and the move of the Community Centre away from the town centre.
6. The GCP provides sufficient sales floorspace (at 27% smaller than Tesco) to meet the weekly shop needs of Sheringham. Tesco sales space is 1,175sqm, GCP 927sqm, and the LDF EC5 indicative is 749sqm. There are also issues of 'lost space' within the Tesco building, plus two independent retail units (or three units in the new application, depending on the landscaping conditions).
7. **The Tesco application has significant adverse impact on economic and physical regeneration; local employment; public and private investment; town centre vitality and viability, and choice; in-centre trade and turnover, and trade in the wider area; and appropriate scale (gross and net floorspace). The GCP proposal overall rates positively on the impact tests (the table below compares).**

## IMPACT TESTS PPS4: TESCO AND GCP APPLICATIONS

### Key

+ positive impact	- adverse impact
- (sa) significantly adverse impact	(blank) neutral impact
n/a not applicable	

### Policy EC10: Determining Planning Applications for Economic Development

	IMPACT OF TESCO	IMPACT OF GCP
<b>EC10.1 General Principle</b>	not favourable	favourable
<b>EC10.2 Impact Assessment (applies to all development)</b>		
a. CO2 emissions, climate change	-	+
b. accessibility, effect on traffic	-	
c. design, character, function of area	-	+
d. economic/physical regeneration	- (sa)	+
e. impact on local employment	- (sa)	+
<b>NOTE: Factors d and e introduced as part of PPS 4 strengthened impact assessment over PPS6</b>		

### Policy EC16.1: Impact Assessment (for main town centre uses/supermarket)

	IMPACT OF TESCO	IMPACT OF GCP
a. public and private investment	- (sa)	+
b. town centre, vitality and viability, choice	- (sa)	
c. allocated sites outside the centre	n/a	n/a
d. in-centre trade/turnover; trade in wider area	- (sa)	+
e. appropriate scale (gross floorspace)	- (sa)	
f. locally important impacts on centres		

### Policy EC17: The Consideration of Planning Applications

EC17 states that applications should be refused where:

- a) the applicant has not demonstrated compliance with the sequential approach (policy EC15); or
- b) there is clear evidence that the proposal is likely to lead to significant adverse impacts in terms of any one of the impacts set out in EC10.2 and EC 16.1.

If there are no significant adverse impacts then the application should be determined by taking account of the positive and negative impacts of the proposal under policies EC10.2 and EC16.2.