



MANNINGTREE TOWN COUNCIL

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Mr Peter Fletcher,
Planning Department, Tendring District Council,
Council Offices,
Thorpe Road,
Weeley,
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15th March 2010

Dear Mr. Fletcher,

Planning Application 08/00603/FUL – Tesco Stores, Station Road, Manningtree

Manningtree Town Council requests that this document is circulated in its entirety to each member of the Development Control Committee. Furthermore the Council invites the DCC to a site inspection, on a market day, so that they can see for themselves the site and the surrounding area.

The overwhelming majority of Manningtree Town Councillors **oppose** this development for the following reasons:

1. Road congestion and safety
2. Retail impact
3. Adverse employment issues
4. Loss of residential amenity
5. Design and scale of the store
6. Development contrary to the adopted policy in the Tendring Local Plan
7. Local Opinion
8. Compromised egress for emergency vehicles leaving the fire station

1 Road Congestion and Safety

In their submission Tesco have admitted that the site is not well connected to the national road network and is thus difficult for HGVs to access (Employment Land Report, 10.5). However, Tesco go on to say: “The overall picture for Manningtree is of free-flowing streets without congestion or delays to drivers or pedestrians.” This statement and several others indicate a fundamental lack of local knowledge and is especially inaccurate on the market days of Friday and Saturday.

The following analysis demonstrates that there is no good route to the proposed store: every road that approaches the vicinity already has difficulties that would be exacerbated were traffic flows to increase significantly. Further, no resident, worker or shopper in the town would wish to see any reduction in on-street parking to ease traffic flows, as parking is already in extremely short supply.

Occasional and brief observations of the traffic through the town may give the impression that it moves freely but because of the narrow roads with numerous pinch points the situation can degrade rapidly to stationary traffic (e.g. where a delivery van has stopped). One particular problem with a safety concern is that of buses and other HGVs having to reverse in the High Street to allow each other to pass (see “High Street” below).

1.1 Road Congestion issues

1.1.1 Station Road

This road is constricted twice: once by the railway bridge near Oaktree Garage, where HGVs must proceed in the middle of the road (omitted from the Transport Assessment) and, more significantly, by the roundabout and rail crossing at the junction with Cox’s Hill in Lawford.

Tesco’s traffic consultant stated in one of the preliminary consultations that this roundabout was one of the reasons for the site being rated ‘amber’ (i.e. not very suitable). Although the traffic consultant claims that additional flows generated by the store would not make a critical difference to this junction, serious consideration must be given to the unusual dynamics of this roundabout:

The A137 (north) exit abuts a railway level crossing and a single-file, height-restricted underpass. When the rail barriers come down (which is frequently and for several minutes during the rush-hours) HGVs cannot exit the roundabout causing the traffic to back up rapidly on all of the approach roads, cutting off access for cars. This also prevents commuters from entering and leaving Manningtree Rail Station and car park, whose only access road joins the A137 at this point. Furthermore, the residents of the Lower Lawford Dale estate have a solitary access road that joins directly onto this roundabout. The existing traffic conditions already make it difficult for them to leave the estate in the mornings. The roundabout also serves an access road to a farm with its concomitant heavy vehicles.

Tesco’s own figures at table 8.1 in the traffic assessment indicate that at peak times the ‘RFC’ (ratio of flow to capacity) for the store’s western roundabout will be 0.904; however, 0.85 is regarded by the Department of Transport as the threshold for congestion. Thus, it is established that the store will cause congestion at peak times even if traffic behaves as Tesco have predicted (and approaches from the west). However, the traffic situation could be far worse if their prediction is optimistic regarding the number of cars drawn to the store (as has happened previously e.g. at Tiptree). Tesco have not made any prediction regarding a higher than predicted flow of traffic from the east along the High Street.

1.1.2 A137 through-Traffic

The regular traffic congestion on the A137 at the railway level crossing during rush hour is exacerbated immensely when there are traffic problems on the A12 between Colchester and Ipswich. It is not unusual for this to occur and it is common to have one-mile delays for traffic approaching from the south. On occasion, the traffic coming from the north can back up all the way to Ipswich (where it can take an hour to get to the bridge from the Brantham Bull). When the A12 is shut the A137 is the only feasible alternative route for a huge number of commuters.

Shoppers and staff arriving in the area from any direction (because Station road becomes gridlocked) will be caught up in the traffic, adding to the number of hours that the area remains at a virtual standstill.

1.1.3 High Street

The High Street is narrow along almost its entire length and contains two significant pinch points: the priority system at Market Cross and the narrow section and sharp bends at Wherry Corner. For Tesco to claim that, ‘In practice, the deficiency in road width appear [sic] to act as a traffic calming measure’ (Transport Assessment 2.13) is to seriously underestimate the situation: it is dangerous and difficult and cannot be improved. The pavements are so narrow in many places that it is impossible to walk abreast of a small child to hold their hand, or easily manoeuvre a pushchair or wheelchair. Additionally, this area is

home to a large number of adults with learning disabilities, (supported by Acorn Village), as well as a considerable population of elderly people, some of whom use mobility buggies. The road safety needs of these individuals, who regularly visit the town centre, must be considered when discussing traffic in the High Street, where vehicles mount the pavements to avoid collision. It is also a bus route, delivery lorries stop there and the traffic backs up at the priority section when cars are manoeuvring in and out of the parking spaces. To propose anything that would deliberately increase vehicle flows along this street is irresponsible.

1.1.4 Brook Street

Irrespective of Tesco's assumption in its Traffic Assessment, that traffic from 'Sector 4' (villages to the south and east) would approach the store via Long Road, Cox's Hill and then Station Road (transport Assessment 7.38), it is reasonable to expect traffic from the south to approach via Brook Street before turning left into Station Road. Brook Street is very narrow, very steep, often congested with parked cars. Tesco's assumption that it would not be used as a short-cut is erroneous as it is already a well-established shortcut.

1.1.5 Colchester Road

This is heavily congested with residents' parked cars to the point that significant portions of it are single file. It also contains a number of tight corners. There are also two schools on its western side, including a rural secondary school served by numerous buses that have nowhere to stop but on the road: traffic congestion is severe at school drop-off and pick-up times and this would be exacerbated by Tesco-related traffic.

1.1.6 South Street

Vehicles that arrive at the store via Brook Street (to avoid the other congested routes) would leave the area via South Street. Although it is a narrow, winding, one-way, steep uphill route cars come down it regularly and attempt to exit into the High Street via a hazardous blind junction.

1.1.7 North Street

It is possible that traffic leaving the store may turn off Station Road into North Street then Quay Street, to avoid giving way at the priority section on the High Street (many motorists already do this). North Street is narrow, has parked cars and poor lines of sight. Quay Street is wider, but has the fire station (with fire engines leaving at high speed) and many parked cars. It is often obstructed by boat trailers and people carrying oars; children often run into it from either the beach or the car park of The Crown Hotel.

1.1.8 The Walls

This would be used by traffic approaching from the east before it reaches the High Street. The road is a popular tourist parking area, particularly in summer, because of the outstanding view of the river and the RSPB sanctuary. At such times it is difficult for a bus or HGV and a car to pass each other. Many tourists, birdwatchers and children, in particular, stop there to view the wildlife, picnic and buy ice-creams and fast food from the street vendors. With the significant increase in traffic there is an increased risk of persons (particularly children) stepping out from between the parked vehicles and being injured.

1.2 Traffic calculations

All traffic flow data appears to be based on an assumption that the proposed store will only generate 75% of the turnover that Tesco normally expect from a store of this size (5.15 in the Retail Assessment). This downward factoring is significant and requires explanation. At peak times an additional 690 new traffic movements per hour are predicted, or 920 movements for 100% of average turnover (i.e. one every 4 seconds). Tesco's figures claim that most of the traffic would be added to the station roundabout and a minor proportion to the streets of the town. The Town Council's view is that an estimated 76% would be added to the Station roundabout; the traffic from zones 1A, 1D and 4 and total of 24%, would

come through the town (table 7.9 in the Transport Assessment and paragraphs 7.37 – 7.39). Critically, the Traffic Assessment has avoided any examination of the impact on traffic flow along the High Street.

1.3 Deliveries by HGV

The hours of opening for which Tesco is applying would involve deliveries being permitted from 7:00 a.m. to 10:00 p.m., six days a week, with reduced hours on Sundays. However, Tesco's submission does not reveal the expected HGV deliveries per day although the transport consultant stated 'about seven' during the public consultation at the Methodist Church Hall on 7th June 2008. This figure is highly questionable: A count carried out by a community group at the Tesco Metro in Yiewsley, west London, showed that 18 lorries per day were being used to service a 1,000 sq.m. store. Another count at the Bull's Bridge Tesco, in Hayes (7,300 sq.m.) counted 80 lorries per day. The gross retail space for this application is 2,611 sq.m. (including both retail sales and 'circulation' space) which suggests between 29 and 47 visits a day to the Manningtree store. This is a high number for a site that Tesco states is unsuitable for industrial use due to poor links for HGVs.

An additional estimate of HGV movements has been made, based on the turnover and HGV activity of the neighbouring Co-op Fiveways store. Although the store will not reveal its turnover it pointed out that the figure of £5.4m quoted by Tesco in the Retail Assessment (Table 6) was inaccurate (the true figure being considered significantly lower than this). They did state that their store is serviced by 16 articulated and 9 rigid lorries per week. Tesco's estimated turnover for the new store is £20.318m p.a. (Retail Assessment, 5.15) which suggests 3.7 times more HGV deliveries (60 articulated and 70 rigid lorries per week i.e. 19 lorries per day). This should be regarded as a minimum as the £5.4m turnover figure for the Co-op does not seem to be credible, and it would not be in Tesco's interests to understate it. Furthermore Tesco is assuming that this store would only operate at 75% of the average for its stores (Retail Assessment 5.15): were it to operate at the company average then 25 lorries a day could be expected.

1.4 Report Methodology

In the Transport Assessment, based on the report by Allsop Merrill, the times of day at which the telephone survey were carried out is not stated. This is significant because it can distort the demographic profile of the survey sample. For example, many people shop in Colchester or Ipswich because they work in those towns and calls made whilst these people are out at work increases the proportion of persons that state they have to travel out of Manningtree specifically to get their shopping. Factors such as this are unknown and question the validity of Tesco's claim that 8 million road miles will be saved per year.

1.5 Train use

The Transport Plan states (3.11) that, 'the main usage of the station by shoppers is likely to come from the neighbouring towns of Mistley and Wrabness'. It is far more likely that shoppers from these areas would travel by bus because it would drop off and collect them much closer to the proposed store than the railway station. An increase in bus passengers may result in more buses being introduced.

2. Retail Impact

2.1 Although Tesco's Retail Assessment (5.36), claims that the proposed store would have 'relatively little impact on the town's shops', it goes on to reveal that the Co-op would lose £1.709M of £5.4M turnover (32%) and town centre shops £0.109M of £1.227M (9%) to the proposed store (the data may be found in the final column of the first page of Table 6 in App C of the Retail Assessment).

- 2.2 It is unlikely that the Co-op store could remain a viable trading entity if it were to lose 32% of its business (a greater loss is anticipated since this percentage is based on the questionably high Co-op turnover figure of £5.4M). If the Co-op is forced to close then the only post office in Manningtree (serving a community with a high proportion of elderly and infirm persons) will also be lost.
- 2.3 A loss of 9% of turnover in the High Street is significant: This loss will not be equal across all shops and will damage the convenience stores the most (i.e. foodstuffs), possibly to the point of closure. Many shops in the town operate on very narrow margins and any loss of trade could force them out of business. One such shop is Stourview Stores that is opposite the Tesco site. It is also the only newsagent in Manningtree to offer newspaper deliveries and thus provides an important local service to the elderly and infirm. Tesco stores do not operate paper rounds. There is no specific mention of the impact the proposed store might have on the market, which is a very useful addition to the local scene, widening consumer choice and drawing trade into the town.
- 2.4 Tesco's argument that "it would bring greater consumer choice to the area" is clearly wrong: The town presently has a Tesco Express store, a range of small independent traders and the Co-op. With the likely closure of the Co-op plus a proportion of the small traders Tesco would dominate, resulting in virtually no consumer choice.
- 2.5 It is widely claimed by Tesco (e.g. "roadshow" display board in Manningtree on 6th and 7th June) that building the store here will reduce the outflow of local expenditure which currently goes to Colchester, Ipswich, Harwich and Clacton. The Retail Assessment (5.46) claims that Fakenham has benefited greatly from the advent of a Tesco there. The Town Clerk at Fakenham reports that at the time the store was built Fakenham had no pre-existing central supermarket and thus it does not bear comparison with Manningtree. Further, the Fakenham store was built on a site in the designated town centre – a 'prime location for retail development', according to North Norfolk District Council's own consultation document of 26/3/2004. Paragraph 5.46 of the Retail Assessment was also used in the planning application for a store in Sherringham which was refused.
- 2.6 A more accurate comparison would be with Downham Market in Norfolk, where a large Tesco has been built to the west of the main shopping area. The Town Clerk there (April 2007) considered that, although the market itself had not suffered because it had been moved closer to the new Tesco, some of the shops had lost trade. In Stalham, Norfolk a shopkeeper (Nigel Dowdney) conducted footfall counts in the high street showing a reduction of 50% (and consequently turnover) since a Tesco was built there, 30m from their high street. This figure was referenced to footfall counted by Norfolk County Council in 1996. In the months following the opening of the Tesco, both the Somerfields and the Co-op closed down, thus *reducing* consumer choice (CPRE, The Real Choice, 2006).
- 2.7 Crucially for any local community such as Manningtree is the fact that money spent in locally-owned shops continues to circulate in the local economy while that spent in a large multinational is largely removed from it. According to the New Economics Foundation, 90% of the money spent in a chain supermarket leaves the area at once, but that spent in locally owned shops is re-spent in the same locality three more times before it leaves the area (New Economics Foundation, The Money Trail, 2005).
- 2.8 An *independent* retail survey carried out on behalf of Tendring DC by GVA Grimley did not see any need for a store of this size in this area. The Retail Assessment for Tesco argues against RSS (East of England Plan) Policy E10 (that a retail development should be consistent in size and scale with the rest of the town centre).
- 2.9 The recent report by the Competition Commission recommended that a 'competition test' be applied to applications for large stores by the major food retailers. According to the Commission's own press release of 30th April, 2008 an applicant would fail the test if they were to have 60% of the groceries sales

area within a ten minute drive of the proposed store, including any stores in the area that they already own.

3. Adverse Employment Issues

- 3.1 The local plan policy ER3 states that if an applicant seeks to change the status of employment land, it must either demonstrate that it is no longer viable or suitable for any form of employment use or engage in a sustained marketing campaign to attract suitable occupants. As stated in paragraph 3.10 of the report, Tesco agreed with TDC in pre-application discussions (to which the Town Council was excluded) that it would opt for the former strategy. The company's consultants therefore seek to show that this site is not suitable for class B employment use, despite the fact that a portion of the site is successfully occupied by Rose Builders (indicating that the site is suitable for a range of commercial uses).
- 3.2 Tesco claim (paragraph 9.2) that the land they are putting forward as part of a Section 106 agreement with TDC on Riverside Avenue West has 'good access from Station Road'. This site appears to have no better access than that of the site they wish to develop for their superstore. Tesco also claim, in the same paragraph, that the site of their tandem Class B application is 'further from... residential areas... thereby minimising conflict between the two.' There is however no consideration given to the conflict that is likely to arise between the proposed superstore and residents on Station Road who dread its arrival.
- 3.3 Tesco does not state whether this location is suitable for 24-hour opening: in the Noise Assessment they state: 8.2: 'the report indicates that the store could open throughout the 24 hour period' with deliveries restricted to between 6:00 a.m. and 11:00 p.m.
- 3.4 The report states (paragraph 10.2) that HGV access to the site is restricted (which is true). However, they fail to point out that access for cars is also restricted by numerous pinch-points on the approach roads. Therefore, if this site is not suitable for industrial use (according to paragraph 10.6, office accommodation), neither is it suitable for a superstore and attendant heavy traffic flows.
- 3.5 It must be noted that almost all the reasons Tesco give for the site they propose for their store being unsuitable for industrial use also apply to their proposed Class B site on Riverside Avenue West. Although this site is further away from residential areas, it is closer to the edge of the AONB, and shares with the proposed retail site all the disadvantages of access and shortfall in demand that, we are given to understand, make that site not useable for Class B use (despite the presence of Rose Builders).
- 3.6 The argument for the proposed retail site being unsuitable for employment use is negated by the presence of Rose builders. If the site has poor access to the road network, it cannot be suitable for a superstore that will be, by Tesco's own admission, 'a major traffic attractor' (Transport Assessment, 5.9). How the site on Riverside Avenue West can be better suited, considering that it shares poor access to the road network, is not understood.
- 3.7 The Town Council has always felt strongly that local employment land should be preserved: we do not want to see Manningtree become merely a commuter town but wish to retain a mix of land-use.
- 3.8 It is not clear how many of the 200 jobs that the store is claimed to create will be full-time or filled by local people: there is no analysis of this in the documentation, which is incongruent with the fact that the application is to build on what is currently designated as employment land. It is worthy of note that the figures for new jobs vary from 240 in the Employment Land Report (10.13) to 200 on the 'roadshow' display boards. Tesco representatives were pressed to give Full-Time Equivalent figures and the figure of 150 was mentioned. Even this figure is questionable when it is known that the 3,757 sq.m. gross store in Fakenham was predicted to provide 'up to 150' full-time and part-time jobs (North Norfolk DC

consultation, 26th March, 2004). It is impossible to believe that Tesco do not know how many jobs a store of this size would support and how many of those would be full-time, part-time and seasonal.

- 3.8 If the Co-op's turnover drops by 32% there will be job losses and possibly complete closure of the store. Any job provided by the proposed Tesco store must be offset against the losses it would cause elsewhere in the local economy. Research in 1998 for the National Retail Planning Forum indicated a net loss of 270 jobs in food retailing within a ten mile radius of each superstore that opened; this calculation did not include job losses in allied trades, such as local growers and processors.

4. Loss of residential amenity

The reduction of quality of life for those living near the proposed store is unacceptable. Residents in the properties (which include almshouses) across the road would lose their street-side parking and suffer severe disturbance and light pollution. Traffic delays would increase and it would be harder to turn into Station Road from many of the side roads. There would be a drastic reduction in residential amenity for hundreds of people due to increased light pollution, particulate pollution, noise and traffic.

5. Design and scale of the store

- 5.1 It is acknowledged that the store has been redesigned to address some of the earlier concerns of the Design Review Panel. However, Manningtree is the smallest town in England with a unique historic character and many listed buildings and unusual features. To place a vast modern supermarket building at the side of the main road into the town is completely out of character and damaging to the aesthetic of what was a 15th Century settlement. The town relies partly upon tourist income and such a modern development so close to its centre is destructive to its quaint image.
- 5.2 The proposed site has an area of approximately 10% the entire area of the town and would irrevocably change the architectural make up of Manningtree. The store's sales floor area is enormous, perhaps even exceeding the total retail area of the rest of the town put together.
- 5.3 Whilst the car park has been relocated to the Eastern side of the site to encourage shoppers to visit the high street it is not known what parking restrictions Tesco will impose to persuade visitors to vacate their premises after shopping.
- 5.4 It is notable that in the Design and Access Statement the pictures shown to indicate the local context omit many of the most attractive local features but include a disproportionate amount of modern development plus the Tesco Express on the High Street. Only two of the ten photographs show the historic context to any fair degree. This indicates that no proper consideration was given to the historic context or to the fact that this site comes within the boundary of the historic town (Adopted Local Plan, inset map 5).
- 5.5 In the Archaeological Desk-Based assessment there is considerable evidence to show that a slipshod approach was taken to the historic context. This calls into question the accuracy of the whole exercise. For example, in Appendix 1 (Gazeteer of sites etc) a number of errors are plainly evident:-
- Demolished church (site 17) named as 'St Michael and All Saints': it was St. Michael and All *Angels*.
 - Site 18: 'Burial ground now a school playground'. It has not been a playground since 1978 – 32 years ago.
 - Site 23 – Salvation Army Hall. This was correctly known as the Salvation Army *Citadel* and was demolished about five years ago.

The map at Figure 7 shows the ‘site’ marked in completely the wrong place. All these inaccuracies give the impression that the entire assessment has been “a tick-box” exercise.

- 5.6 It is worthy of note that post-medieval finds on the site might be of local importance. There are also significant prehistoric remains on the floodplain to the west of Cox’s Hill: It is possible that similar remains could be found on this site, although no mention of this is made in the report.

6. Development contrary to the Adopted Policy in the Tendring Local Plan

- 6.1 Our objection is supported by the stated aim of Policy TR1a (in the Adopted Local Plan, Dec 2007) that states, ‘Proposals for development affecting highways will be considered in relation to the road hierarchy to *reducing and preventing hazards* and inconvenience to traffic’ (our italics). The Adopted Local Plan acknowledges at para 12.49 that ‘A major issue for residents is traffic in the centre of Manningtree’ and further states that ‘The Council works with the County Council, Town Council and other interested bodies over the introduction of further traffic management measures’. To allow this development will be to negate all the work that has been done to reduce traffic flows through the centre of the Town.

7. Local Opinion

- 7.1 Tesco claims that 80% of those who attended its public consultations were in favour of the new store. The Town Council questions those figures for the following reasons:-
- 7.2 Martin Robeson, in his Statement of Community Engagement, states at App 2 that there were more negative (392) than positive (359) responses to the consultation of July 2007. This is despite the fact that many potential negative responders who opposed the plans either refused to take part in what they regarded as a cosmetic exercise in consultation knowing that the outcome would have no bearing on Tesco’s decision to press ahead, or did not wish to give Tesco their personal details.
- 7.3 A survey carried out by the local Liberal Democrats showed that the local population was split with 65% opposed and 35% in favour of the proposed store. This survey was of all households in the immediate district, with forms being delivered as part of a regular newsletter. An analysis of this survey showed that the vast majority of those in favour lived in Mistley and Lawford; far from any direct impact created by the proposed store. The results of this survey are considered credible as they are supported by the on-line poll currently being run on the Manningtree AZ website which, on 20th July, 2008, gave 39% in favour and 61% opposed to the proposals.
- 7.4 The Manningtree Telephone Survey that accompanies the application states that only 8.6% of residents in the area from which Tesco expects to attract trade see the need for a new supermarket or improved supermarket in Manningtree (this rises to 15.5% for Sector 1 alone, broadly speaking Manningtree, Mistley, Lawford and Brantham). Of that 15.5 %, only 58.8% wanted a Tesco. In other words, of 110 people surveyed in Sector 1, only ten individuals (9.1%) actually wanted a Tesco store in Manningtree (Telephone Survey, p30).

8. Compromised egress for emergency vehicles leaving the fire station

- 8.1 As described in section 1.1.7 the traffic along Quay Street is likely to increase significantly causing congestion. The Town’s Fire Station is situated in this road and emergency vehicles may be blocked by stationary traffic waiting to turn onto The Walls/High Street.

Summary

The traffic congestion issues are serious and will have a severe impact on the area. Also, there is a danger that emergency vehicles leaving the Fire Station may be impeded.

It is highly likely that the construction of the store would have a negative impact on trade and employment in the town.

The replacement of employment land that would be lost by this development is erroneous: the land proposed is no better than the land lost and the site of the proposed store is, in itself, partially occupied by a Class B user. This user has found it financially viable to adapt buildings already on site for its use.

Residents in the almshouses and other properties opposite the store would suffer serious disturbance and the Council does not feel that the cost to them would be mitigated by any benefits to the local community. The traffic and pollution that would be created by this store would far outweigh any convenience it might bring to the lives of local people. Road safety would be compromised.

The revised design of the store still gives no concession to its position abutting the boundary of the Historic Town (per the Adopted Local Plan, Dec 2007, inset map 5). It remains ugly, intrusive and out of scale.

The construction of this store is in complete opposition to the adopted local plan.

Manningtree is not against development in the Town. It is a progressive council but, being the smallest town in England, development must be congruent with that image for the benefit of the residents and the attraction of tourists.

Yours sincerely,

Wendy Saint-James