

Mr A. Toner,
Competition Commission,
Victoria House,
Southampton Road,
London
WC 1B 4AD

29th October 2007

Dear Mr Toner

Cambridge Friends of the Earth has previously registered an objection with Cambridge City Council to an application for a local Tesco store, but feels that the issues raised by the application warrant referral to your organisation.

Details of the application, and the parts of our objection that we feel will be of interest to the Competition Commission, are outlined below.

Planning Application (Ref: 07/0811/FUL)

"Single story rear extension and installation of plant" to the rear of 163-167 Mill Road.

Although not strictly related to the planning application in question and accepting that the opening of a supermarket at 163-167 Mill Road does not constitute a change of use and therefore, in itself, requires no planning permission, Cambridge Friends of the Earth feels that government policy, as laid out in Parliamentary Planning Statement 6 (PPS 6), runs counter to the opening of a supermarket at this location and could leave the City Council open to the possibility of legal challenge(s) should the application be approved.

The relevant parts of PPS6 which lead us to these conclusions include:

Paragraph 2.22

"A diversity of uses in centres makes an important contribution to their vitality and viability. Different but complementary uses, during the day and in the evening, can reinforce each other, making town centres more attractive to local residents, shoppers and visitors. Local planning authorities should encourage diversification of uses in the town centre as a whole, and ensure that tourism, leisure and cultural activities, which appeal to a wide range of age and social groups, are dispersed throughout the centre."

Paragraph 3.21

"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, including the likely cumulative effect of recent permissions, developments under construction and completed developments. The identification of need does not necessarily indicate that there will be no negative impact."

Paragraph 3.22

"In particular, local planning authorities should consider the impact of the development on the centre or centres likely to be affected, taking account of:

- *the likely impact of the proposed development on trade/turnover and on the vitality and*
- *viability of existing centres within the catchment area of the proposed development and,*
- *where applicable, on the rural economy (an example of a positive impact might be if*
- *development results in clawback expenditure from the surrounding area);*
- *changes to the range of services provided by centres that could be affected;*
- *likely impact on the number of vacant properties in the primary shopping area;*
- *potential changes to the quality, attractiveness, physical condition and character of the*
- *centre or centres and to its role in the economic and social life of the community"*

Cambridge Friends of the Earth believe that there is ample evidence to demonstrate that Tesco's aggressive pricing policies and unfair competitive practices often lead to small independent traders being forced out of business.

The opening of a Tesco store therefore has the potential to lead to a decrease in the diversity of independent retail outlets in the Romsey area with consequent negative impacts upon its renowned individual character and local choice.

Romsey is already well served by a local Co-operative store, virtually adjacent to the proposed store and Cambridge Friends of the Earth consider that this application, at this particular location, is virtually a statement of intent by Tesco to crush any local competition

Tesco is already well, perhaps over, represented in Cambridge and, by allowing this store to open, we feel that Cambridge City Council will merely be supporting Tesco's bullying of financially weaker retailers.

Finally, we are sure that Tesco are fully aware of the logistical limitations of the site in question and suspect that, should the store be allowed to open, further planning applications will almost inevitably follow to optimize the layout of the site and immediate environment for deliveries, to the considerable detriment of the local community.

Regards

Ian Ralls

Cambridge Friends of the Earth