



Nathaniel Lichfield  
& Partners  
Planning. Design. Economics.

**Eden Westwood Proposal**

**Critique of Retail and Leisure  
Statement**

Mid Devon District Council

7 March 2016

31277/JCO/PW

Nathaniel Lichfield & Partners  
Helmont House  
Churchill Way  
Cardiff CF10 2HE

[nlplanning.com](http://nlplanning.com)

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Registered Office:

14 Regent's Wharf

All Saints Street

London N1 9RL

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## 1.0 Introduction

- 1.1 Nathaniel Lichfield & Partners (NLP) has been commissioned by Mid Devon District Council (MDDC) to provide an independent review of a major Retail and Leisure Proposal at Junction 27 of the M5, known as Eden Westwood (EW).
- 1.2 The scheme is being proposed as a site allocation within the draft Mid Devon Local Plan by EW – a partnership between Friend’s Life Limited and the Eden Project.
- 1.3 NLP previously undertook a critique of a Town Centre Uses Statement, prepared by CBRE, which was submitted in support of representations to the Mid Devon Draft Local Plan on behalf of Eden Westwood (EW).
- 1.4 In that critique, NLP concluded that the Submission Plan would not be rendered unsound if the EW proposal was not allocated within it.
- 1.5 Nonetheless, NLP noted that the proposal offered a significant opportunity to address 2 out of the 6 recommendations within the Mid Devon Tourism Study. However in the absence of the necessary evidence that demonstrated need, a complete sequential site analysis and a complete study of the potential impacts on other development plan proposals and retail draw, it was not possible for the Council to allocate the site for the proposed development on the basis of the information available at that time.
- 1.6 Mid Devon District Council (MDDC) has commission NLP to undertake the necessary additional analysis in order that the Council can make a robust evidenced based assessment about the inclusion of EW within the Local Plan.
- 1.7 In particular, this Addendum critique, focuses on the following four areas, which were highlighted as needing further analysis in NLP’s previous report:
- 1 the need for thee proposed development, in particular the Designer Outlet Village (DOV);
  - 2 a sequential analysis of the Local Plan allocations within the Submission Plan, as well as providing further analysis of the Exeter Coach and Bus Station site;
  - 3 a fine grain analysis of the trade draw pattern of the development; and
  - 4 a corresponding fine grain analysis of the trade diversion and impact of the proposal in monetary and floorspace terms, and how that impacts on emerging or existing local plan allocations in the region.

## 2.0 **Need Assessment**

2.1 A number of additional queries have been raised in relation to CBRE's analysis and further information is provided within this section.

### **Is CBRE's Design Year Appropriate?**

2.2 CBRE identifies the design year as 2024.

2.3 The NPPF (paragraph 26) indicates that in relation to planning applications for retail and leisure development, the impact of the proposal on town centre vitality and viability should be assessed "up to five years from the time the application is made." The NPPF goes on to indicate that "for major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made."

2.4 This NPPF guidance relates to the determination of planning applications rather than the allocation of sites through the plan making process. Development plans are required to allocate a range of suitable sites to meet the need in full for main town centre uses over the plan period as a whole. Given that the plan period extends beyond five years and that development is likely to be phased over the plan period, it would be inappropriate to assess the impact of all proposed development plan allocations after only five years. The realistic programme for development over the plan period needs to be considered.

2.5 The CBRE statement provides limited information in relation to the timing/phasing of development. This 2024 design year is appropriate if the development is unlikely to be completed before 2022, allowing two years to achieve full and settled trading.

2.6 Provided construction on the development proposals does not commence before 2019, and allowing for up to 3 years for construction, then a design year of 2024 for the impact assessment is appropriate in this case.

2.7 If an early planning application were to be submitted during 2016 and construction commenced in 2017, then this would suggest completion in 2020 and a design year of 2022 rather 2024. The potential implications of this earlier design year are explored later.

2.8 Given the scale of the proposal and the fact that this is being promoted through the Local Plan process, rather than an imminent planning application, a design year of 2024 is reasonable.

### **Further Clarification on Need**

2.9 The proposed Food Hall is likely to have a dual role in meeting predominantly the needs of tourist visitors to EW, and to a much lesser extent and meeting

local resident's needs. NLP accepts the need for the Food Hall can be linked to The Ark tourist attraction.

- 2.10 The proposed Food Hall is also likely to serve a dual purpose, and we are satisfied there is a need for the modest scale of convenience goods retail development proposed.
- 2.11 Based on evidence from other DOV's across the country and NLP's experience, we accept the DOV will attract trade from a wide area, particularly if it is linked with a major tourist attraction.
- 2.12 The need for tourism attractions will be qualitative in nature, recognising these attractions will have a wide draw. The need for these facilities cannot always be quantified in terms of the local area. The scale of facility proposed is of a regional nature.
- 2.13 The need for tourism attractions should be aligned with the tourism strategy/vision for the area rather than an analysis of the local catchment population and expenditure.
- 2.14 The need for a themed hotel is likely to be linked to the generation of visitors to the tourist attraction. Many tourist attractions have associated hotel accommodation.
- 2.15 The proposed restaurant and café uses can be considered ancillary to the proposed tourist attraction, and therefore the need for these uses is generated by the visitors to the tourist attraction rather than a need generated by the local catchment population.

## **NLP's Further Analysis of Need for the DOV**

- 2.16 The CBRE's assessment demonstrates there is theoretical expenditure capacity to support the DOV, due to growth in available expenditure in the Core Catchment Area. However CBRE does not take into account that local authorities within the catchment area will be seeking to accommodate expenditure growth generated in their own local authorities by making retail allocations within their Local Plans. No analysis has been undertaken by CBRE to demonstrate the degree to which the EW proposal would reduce the need for retail floorspace allocations within surrounding local authorities in the future.

### **Retail Capacity in Mid-Devon**

- 2.17 CBRE estimates that shopping facilities in Mid-Devon attract £83.7 million of comparison goods expenditure from the Core Area zones in 2014. Most of this trade is attracted from the District, with 82% (£68.8 million) coming from Zones 12 and 14. This indicates that existing shopping destinations within Mid Devon have a local catchment area. The DOV will have a much wider catchment area, with only 28% of its turnover derived from the Mid Devon zones (12 and 14).

- 2.18 Comparison goods retail facilities only retain around 25% of the comparison available from residents within the District, and there is potential to claw back some of this expenditure leakage, primarily leakage to Exeter.
- 2.19 Comparison goods expenditure attracted to Mid Devon is projected to increase from £83.7 million in 2014 to £124.1 million in 2024, an increase of £40.4 million.
- 2.20 Not all of this expenditure growth will be available to support new retail development, because some of the growth will be absorbed by existing retail floorspace through the growth in turnover efficiencies. Experian currently recommends that existing comparison goods retail floorspace could increase its turnover by 2% per annum. Based on a 2% increase per annum, expenditure attracted by existing retail floorspace in Mid Devon should increase from £83.7 million in 2014 to £102 million in 2024, which would leave around £22.1 million available to support new retail floorspace in Mid Devon.
- 2.21 Based on an average turnover density of £5,500 per sq.m net, this expenditure growth could support around 4,000 sq.m net (5,400 sq.m gross) of additional comparison goods floorspace by 2024. Extrapolated to 2026, comparison goods expenditure attracted to Mid Devon, based on constant market shares, would increase to around £134 million. The benchmark turnover of existing floorspace would increase to £106 million, leaving £28 million growth for new floorspace at 2026, which could support around 4,900 sq.m net (6,500 sq.m gross).
- 2.22 There is no quantitative need for the DOV comparison floorspace, over and above other allocations within Mid Devon, based on local expenditure generated within the District alone.
- 2.23 NLP's impact assessment in Section 3 estimates the DOV will divert £5.45 million from Mid Devon, and would reduce the above floorspace capacity projections in the District by less than 1,000 sq.m net (1,250 sq.m gross).
- 2.24 The DOV would meet some but not all of the identified local need for comparison goods floorspace in the local authority during the Plan period. If the Council were to make an alteration to the draft Plan in order to accommodate the EW proposal, a corresponding reduction of 1,000 sq.m net or 1,250 sq.m gross of comparison goods retail floorspace should be made within the Submission Plan.
- 2.25 The Mid Devon Retail Study 2012 indicated advised that over the Plan period (to 2026) there would be residual comparison goods expenditure in Tiverton of £33.2 million and £1.5 million in Crediton, with no emerging comparison goods capacity in Cullompton. These projections assume that there will be no change in the existing market shares.
- 2.26 The Local Plan previously indicated that the commercial requirement includes an element of non-food retail floorspace (14,000 sq.m). This amount of floorspace identified is similar to the scale of comparison floorspace proposed in the DOV. The Council has already sought to meet its identified comparison

goods need through various Local Plan allocations. We understand the Council is giving consideration to reducing the Local Plan requirement is now 7,000 sq.m to more accurately reflects the evidence within the Retail Study 2012. This projection is broadly consistent with the NLP's revised comparison goods capacity outlined above (6,500 sq.m gross). NLP's impact assessment suggests the DOV would reduce the Plan requirement by 1,000 sq.m net (1,250 sq.m gross).

- 2.27 As indicated earlier, the DOV will attract customers from wide area, and will absorb retail expenditure capacity within surrounding authorities as well as Mid Devon. The need for the DOV can only be demonstrated in terms of growth within the wider sub-region, therefore it is necessary to consider the implications for surrounding authorities within the sub-region.

### **Retail Capacity in the Core Area**

- 2.28 Comparison goods expenditure within the Core Area zones (6 to 18) is estimated by CBRE to be £7.09 billion in 2014. This is projected to increase to £10.61 billion in 2024, an increase in of +£3.52 billion.
- 2.29 CBRE estimates that the about 74% of this expenditure (£5.33 billion) is retained in the Core Area at 2014, and 26% leaks to other destinations. Based on current shopping patterns about £2.6 billion of expenditure growth should be retained in the Core Area.
- 2.30 Again some of this growth will be absorbed by existing retail floorspace through the growth in turnover efficiencies. On this basis the expenditure attracted by existing retail floorspace in the Core Area should increase from £5.33 billion in 2014 to £6.37 billion in 2024, which would leave around £1.46 billion available to support new retail floorspace in the Core Area.
- 2.31 Based on an average turnover density of £5,500 per sq.m net, this expenditure growth could support around 265,000 sq.m net (354,000 sq.m gross) of additional comparison goods floorspace by 2024.
- 2.32 The comparison goods turnover of the DOV is estimated to be £87.8 million (see Table 1). The DOV will have an extensive catchment area and 20% of this turnover is expected to come from beyond the core area zones. The remaining £70.2 million will be drawn from the Core Area.
- 2.33 Total comparison goods expenditure growth within the Core Area is estimated to be £3.52 billion. The turnover of the DOV (£70.2 million), derived from the Core Area, accounts for only 2% of projected expenditure growth up to 2024.
- 2.34 Even if all of the DOV's core area turnover, absorbs only expenditure growth that is theoretically available to support new retail floorspace in the Core Area (i.e. allowing for expenditure outflow and increase turnover efficiencies) then the DOV will account for only 4.8% of growth up to 2024 (£70.2 million out of £1.46 billion).

2.35 The overall retained comparison goods retail capacity within the Core Area would reduce from around 265,000 sq.m net (354,000 sq.m gross) to about 253,000 sq.m net (337,000 sq.m gross).

2.36 These figures suggest there will be significant residual expenditure growth to support new retail development in the Core Area, over and above the DOV.

## **Implications for Allocations in Neighbouring Authorities**

2.37 NLP has estimated the amount of comparison trade diversion from each local authority to the DOV, in Section 3. This trade diversion at 2024 has been converted into theoretical floorspace capacity, i.e. an equivalent amount of net comparison goods floorspace, based on an average turnover density of £5,500 at 2024. A gross floorspace figure is also provided by assuming a net to gross ratio of 75%.

2.38 Most of the local authorities will experience a trade diversion that results in only small reductions in the future floorspace capacity in the authority, and these changes are not considered significant.

2.39 Only four local authorities in the catchment area are anticipated to experience a trade diversion that equates to more than 1,000 sq.m of comparison goods floorspace (NB – the NPPF minimum threshold for impact assessments is 2,500 sq.m), as follows:

- Taunton Deane Borough Council
- Exeter City Council;
- North Devon District Council; and
- Mid Devon District Council.

### **Taunton Deane Borough Council**

2.40 CBRE's figures suggest Taunton's comparison goods turnover will increase from £387.7 million in 2014 to £575.4 million in 2024, an increase of around £188 million. Allowing for growth in turnover efficiency, around £103 million of this growth should be available to support new floorspace, which equates to 18,700 sq.m net (25,000 sq.m gross) by 2024.

2.41 NLP estimates that around £10 million of comparison goods expenditure would be diverted from Taunton Deane Borough by 2024, if EW were to proceed.

2.42 This equates to around 1,820 sq.m net or 2,426 sq.m gross of comparison goods floorspace, which is about 10% of the theoretical projection to 2024.

2.43 The Taunton Deane adopted Core Strategy sets out how the Taunton Town Centre Area Action Plan (TTCAAP), existing commitments and the proposed district centre at Monkton Heathfield are to provide sufficient short and medium term opportunities to accommodate the retail development needs within the Taunton area to at least 2021, as projected at the time. Given the uncertainty

regarding retail projections, it was not considered necessary to make allocations beyond 2021. The EW will diverting future growth at 2024, and will not necessarily conflict with the adopted Development Plan.

- 2.44 An updated Retail Study was prepared for the Council in 2013, which took into account the impacts of the economic slowdown. It assessed a significant reduction in required comparison floorspace (from 51,466 to 29,402 sq.m net) over the plan period (up to 2028) compared to the 2010 Taunton Deane Retail and Leisure Study. This reduction was attributed to slower rates of population and expenditure growth than before and increased levels of claim on expenditure from new planning permissions and special forms of trading. The revised floorspace projection to 2023 is 15,313 sq.m net (20,417 sq.m gross), which is broadly consistent with the projection to 2024 shown above.
- 2.45 As a result, the levels of floorspace indicated in the adopted TTCAAP are now greater than those forecast in the most up to date Retail Study. The updated Study recommends that the retail content of the TTCAAP sites should be reviewed by the Council.
- 2.46 The Review of the TTCAAP has not yet commenced and is anticipated to begin in 2016. There is therefore scope for the proposed EW allocation to be taken into account in the forthcoming review of the AAP and the requirement for additional floorspace reduced accordingly.

### **North Devon District Council**

- 2.47 CBRE's figures suggest Barnstaple's comparison goods turnover will increase from £275 million in 2014 to £396.1 million in 2024, an increase of around £121 million. Allowing for growth in turnover efficiency, around £61 million of this growth should be available to support new floorspace, which equates to 11,100 sq.m net (14,800 sq.m gross) by 2024.
- 2.48 NLP estimates that EW would attract around £6.9m of comparison goods expenditure diverted from North Devon, which equates to around 1,250 sq.m net or 1,670 sq.m gross of floorspace, which is just over 11% of the projected theoretical capacity to 2024 set out above.
- 2.49 The adopted Local Plan for North Devon was adopted in 2006, but only covers the period to 2011, and the impact of proposals at EW would not therefore conflict with the adopted Development Plan.
- 2.50 North Devon District Council is currently in the process of preparing a Joint Local Plan with Torrington District Council. It is at a fairly advanced stage of preparation and is anticipated to be submitted for Examination in early 2016.
- 2.51 The draft Plan states that the favoured approach to address retail capacity needs is to seek improved provision within the towns through regeneration and redevelopment, such as through the delivery of a mixed retail scheme on the Queen Street/Bear Street site (Policy BAR11). The Retail and Leisure Assessment 2012 identified the need for additional retail floorspace:

- 21,557 sq.m of comparison and 7,185 sq.m of convenience floor space in Barnstaple 2012-2032;
- 1,480 sq.m of comparison floor space in Bideford and
- a further requirement for 9,174 sq.m of convenience and comparison floorspace across the other towns, the bulk of which being required in Braunton, Ilfracombe and South Molton.

- 2.52 The Strategy states that in accommodating identified need, a sequential approach to site release will be applied.
- 2.53 The main allocation in Barnstaple (BAR11) is identified as providing a 'substantial proportion' of the retail floorspace requirements for North Devon district over the Plan period as identified in the 2012 Retail and Leisure Study, although no specific figure is set.
- 2.54 A further flexible allocation is made at Anchorwood that identifies 6,000 sq.m net retail floorspace.
- 2.55 Given that there is some flexibility in the retail allocations, and that the anticipated EW leakage amounts to around 5% of the total identified in the North Devon and Torridge Retail Study, it is considered that an allocation at EW would not affect the Soundness of either the Mid Devon or North Devon/Torridge Local Plans.

### **Exeter City Council**

- 2.56 CBRE's figures suggest Exeter's comparison goods turnover will increase from £751 million in 2014 to £1,093 million in 2024, an increase of around £342 million. Allowing for growth in turnover efficiency, around £178 million of this growth should be available to support new floorspace, which equates to 32,300 sq.m net (43,100 sq.m gross) by 2024.
- 2.57 NLP estimates that around £23.5m of comparison goods expenditure will be diverted from Exeter to EW at 2024, which equates to around 4,265 sq.m net or 5,700 sq.m gross of future floorspace, which is just over 13% of the projected theoretical capacity set out above.
- 2.58 The Exeter Retail Study 2008 identifies capacity for additional retail floorspace within the City Centre up to 2026. The Core Strategy makes provision for around 37,000 sq.m net comparison retail floorspace between 2006 and 2026, which is broadly in line with the projections above.
- 2.59 The Core Strategy takes a cautious approach to City Centre comparison floorspace by proposing to meet the capacity forecast to 2021, under a scenario where market share does not increase rather than allocate in full to 2026. Under Policy CP8 this includes up to 30,000 square metres of comparison floorspace in the Bus and Coach Station area, to be developed as part of a mixed-use scheme.
- 2.60 A planning application for the mixed use redevelopment of the Bus and Coach Station has recently been submitted, however, the total amount of floorspace proposed is 21,000 sq.m gross, not all of which will be comparison goods

floorspace. The diversion to EW is within the shortfall of floorspace that the Core Strategy envisaged would be developed at the Bus station site.

- 2.61 Allocating EW would therefore not conflict with the delivery of the Core Strategy, and indeed could be said to be assisting in meeting the under provision at the Bus Station site.

### **Conclusion**

- 2.62 Expenditure growth in the Core Area could support around 265,000 sq.m net (354,000 sq.m gross) of additional comparison goods floorspace by 2024. The DOV would only marginally reduce this projection to about 253,000 sq.m net (337,000 sq.m gross). This is a 4.5% reduction and is based on a high turnover assumption for the DOV. These figures suggest there will be significant residual expenditure growth to support new retail development in the Core Area, over and above the DOV.
- 2.63 There are three local authorities in the region that, along with Mid Devon, will experience relatively high levels of trade diversion, that are likely to impact on their requirement to allocate retail floorspace within their Development Plan Documents.
- 2.64 There is a similar pattern within the three local authorities. It is concluded that the EW proposal can be accommodated within the existing adopted DPDs, due to flexibility in the allocations, time frame for allocations, and/or under provision in applications compared to plan policies.
- 2.65 In the case of Taunton Deane, an updated evidence base has identified over-provision within the DPDs. The EW would increase this over-provision in plan-making terms, and TDBC may need to adjust their relevant DPDs to take account of the changes in retail need, and the impact of EW could be reflected within this update under the Duty to Co-operate.

## 3.0 **Retail Impact Assessment**

### **National Guidance**

- 3.1 The Planning Practice Guidance advises that when considering impact in the plan making process, issues of adverse impact should not arise if the Local Plan is based on meeting the assessed need for town centre uses in accordance with the sequential approach.
- 3.2 In terms of retail impact, the NPPF (paragraph 26) states that planning applications for town centre uses should be assessed against:
- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
  - the impact of the proposal on the town centre vitality and viability, including local consumer choice and trade in the town centre and wider area.
- 3.3 If a proposal is likely to lead to a significant adverse impact against one or more of these factors then this material consideration may still warrant refusal. The NPPF and supporting NPPG provide limited commentary on what will constitute a significant adverse impact, and this will clearly depend on the specific local circumstances e.g. the current health and vitality of the affected town centre. Stronger centres can withstand more impact than weaker centres.
- 3.4 NPPF paragraph 14 indicates that any adverse impacts of proposals would need to “significantly and demonstrably outweigh the benefits” of the proposals to warrant refusal. This suggests that high levels of impact may be considered acceptable if the benefits of the development out-weigh the harm caused, and this is a matter for the decision maker.
- 3.5 In most cases significant adverse harm on a town centre would result where an out-of-centre development significantly delays or jeopardises major planned investment within the town centre, and/or where the development would result in shop closures that would undermine local consumer choice within the town centre. The current level of shop vacancies within the town centre will influence the degree to which the town centre can afford to lose planned investment or experience shop closures.
- 3.6 GVA raised concerns about the robustness of CBRE’s town centre health checks. CBRE’s health checks provide a snapshot of the centres as at 2014. The implications of the predicted impact needs to be considered in the context of the health check assessments, i.e. a healthy centre will be more capable of withstanding a certain level of impact than a vulnerable centre. These issues are addressed below.
- 3.7 NLP’s analysis in Section 2 indicates that the Designer Outlet Village (DOV) raises the main issues in terms of retail need and likely impact. It is appropriate

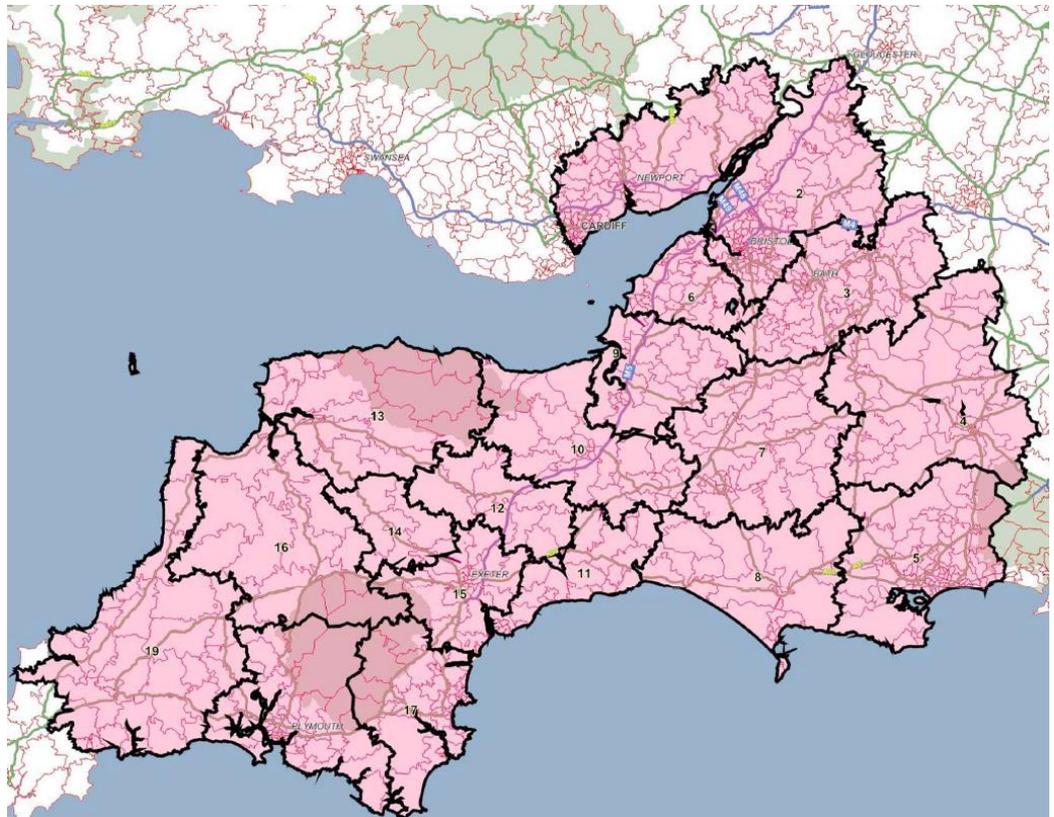
to consider the impact of this element of the proposal in order to inform the Council of the likely impact should they determine to include the EW allocation on account of other material considerations.

## NLP's Analysis

- 3.8 In order to address the issues raised in relation to CBRE's impact assessment, NLP has considered the trade draw and penetration rate of the DOV on a more detailed zone by zone basis.

### Trade Draw

- 3.9 The study area adopted by CBRE includes 19 zones covering a wide area, as shown below. Given the nature of the proposed development, NLP accepts the development will draw trade from a wide area, but most of the trade will come from the core zones 6 to 18.



- 3.10 As set out in Table 1 in Appendix 1 identifies, NLP estimated that 25% of the turnover of the DOV will be drawn from Zone 12 – which broadly correlates to MDDC. This represents a market share penetration rate of 7% of total expenditure from residents living within Zone 12.
- 3.11 Beyond Mid Devon, the trade draw is expected to be widely dispersed across the core catchment area zones. The penetration rate in the remaining zones is very low at 2% or less. Beyond the core zones, we estimate the proposals will attract 20% of its trade, primarily from tourist visitors.

- 3.12 This analysis is an important step in validating the assumptions made regarding trade diversion in CBRE's Table I6.
- 3.13 When greater consideration is given to where the turnover is likely to be generated from, it is easier to make assumptions regarding the likely pattern of trade diversion and impact on town centres.

### **Trade Diversion**

- 3.14 CBRE identified only 12 town centres within the Core Catchment Area that would experience trade diversion to the DOV. As indicated above, the DOV will draw trade from a wide area, see estimates in Table 2, but with most of the trade coming from the core zones 6 to 18. There are 32 centres within these cores zones, as listed in Table 2. Given the trade draw of the DOV from across all the core zones, all 32 centres will experience some level of trade diversion, albeit the amount of trade diverted from peripheral and smaller centres will be insignificant.
- 3.15 This proportion and resulting amount of trade diversion assumed by NLP is set out in Tables 2 and 3, Appendix 1.
- 3.16 Because NLP assumes that the trade draw will be dispersed across a wider number of centres, the main difference between NLP and CBRE's assessment is that NLP assumes generally lower levels of trade diversion from each centre than CBRE, but more centres will experience trade diversion and impact.
- 3.17 Both NLP and CBRE conclude that the highest level of trade diversion will be from Exeter, and both estimates are very similar – £23.5M (NLP) and £23.7M (CBRE).
- 3.18 NLP also assumes that there will be a greater level of trade diversion from Tiverton (£4.39m) compared to CBRE (£1.8m).
- 3.19 NLP estimates that Taunton will experience £10.1m compared to CBRE's assessment of £17.6m.
- 3.20 Trade diversion and proportional impacts on town centres need to be viewed in the context of projected expenditure growth, and the degree to which trade diversion will be offset by this growth. CRBE indicates that comparison good expenditure will grow by around 50% between 2014 and 2024, in part due to a 9.3% increase in population. The growth between 2014 and 2022 will be around 41%.
- 3.21 The resulting impact of this level of trade diversion is summarised in NLP's Table 4, Appendix 1.
- 3.22 In percentage terms, the greatest level of impact (19.5% in 2022 and 17.9% in 2024) is anticipated to fall on the Atlantic Village Factory Outlet Centre in Bideford, given that the centre has a relatively low existing turnover and has an overlapping catchment area with Eden Westwood. It is widely accepted that

similar forms of retailing will have the greatest propensity to compete in terms of the comparison goods offer, as like competes with like.

- 3.23 In should be noted that the Atlantic Village FOC is not a designated town centre and therefore is not afforded protection from the impact of other developments and this impact is not a planning concern.

### **Exeter**

- 3.24 Whilst Exeter is anticipated to experience the greatest level of trade diversion as a result of the proposal, the anticipated level of impact is relatively low at 2.3% in 2022 or 2.2% in 2024. CBRE's centre health check indicates that Exeter had 494 Class A1 retail units in 2014. The vacancy rate in the centre was about 8% compared with the national average of 13.4% at that time.
- 3.25 As a worst case, an impact of 2.3% would represent 11 retail units. If 11 shops were lost then the vacancy rate in Exeter would increase from 8.1% to 9.4%, which is still below the national average and this would not represent a significant reduction in customer choice. However comparison expenditure is projected to grow by 41% between 2014 and 2022, and this growth should support a reduction in vacant units in Exeter, regardless of the 2.3% impact envisaged. NLP's forecast impact his is not considered to be significant.

### **Tiverton**

- 3.26 Tiverton is expected to experience the highest level of trade diversion at 5.9% in 2022, or 5.4% at 2024.
- 3.27 CBRE's centre health check indicates that Tiverton had 154 Class A1 retail units in 2014. The vacancy rate in the centre was 6.3%, under half the national average (13.4%).
- 3.28 As a worst case, an impact of 5.9% would represent 9 retail units. If 9 shops were lost then the vacancy rate in Tiverton would increase from 6.3% to 9.3%, which is still below the national average and this would not represent a significant reduction in customer choice. The 41% growth in comparison expenditure between 2014 and 2022, should support a reduction in vacant units in Tiverton, regardless of the 5.9% impact envisaged. NLP's forecast impact his is not considered to be significant.

### **Cullompton**

- 3.29 Cullompton is expected to experience the next highest level of trade diversion at 5.4% in 2022, or 4.7% at 2024.
- 3.30 CBRE assessment does not provide a centre health check for Cullompton. However GVA's 2012 retail study indicated that Cullompton had only 33 comparison good shops in 2012. The vacancy rate in the centre was 15% at that time.
- 3.31 As a worst case, an impact of 5.4% would represent only 2 comparison goods shops. If 2 comparison goods shops were lost then the vacancy rate in Cullompton would increase from 15% to 17%. The loss of 2 shops would not represent a significant reduction in customer choice. Again, the 41% growth in

comparison expenditure between 2014 and 2022, should support a reduction in vacant units in Cullompton, regardless of the 5.4% impact envisaged. NLP's forecast impact his is not considered to be significant.

### **Honiton**

- 3.32 Honiton is expected to experience the third highest level of trade diversion at 5% in 2022, or 4.5% at 2024.
- 3.33 CBRE assessment does not provide a centre health check for Honiton. However GVA's 2008 East Devon retail study indicated that Honiton had 98 comparison good shops. The vacancy rate in the centre was 4% at that time.
- 3.34 As a worst case, an impact of 5% would represent 5 comparison goods shops. If 5 comparison goods shops were lost then the vacancy rate in Honiton would increase from 4% to 7%, which is significantly below the national average. The loss of 5 shops would not represent a significant reduction in customer choice. Again, the 41% growth in comparison expenditure between 2014 and 2022, should support a reduction in vacant units in Honiton, regardless of the 5% impact envisaged. NLP's forecast impact his is not considered to be significant.

### **Summary**

- 3.35 The highest levels of impact at 2022 (less than 6%) amount to about 2 years growth in comparison goods expenditure. Total comparison goods expenditure is expected to increase by 41% between 2014 and 2022, about 5% per annum. The impact on Tiverton, Cullompton and Honiton do not represent a significant adverse impact because the level of trade diversion will be more than offset by future population and expenditure growth. Furthermore these town centres are considered to be relatively vital and viable.
- 3.36 Having undertaken this fine grain analysis of anticipated trade draw, trade diversion and impact, NLP is satisfied that the impacts of the DOV are not significant. The level of trade diversion is unlikely to undermine consumer choices within town centres or result in a significant increase in shop vacancies, because trade diversion will be offset by expenditure growth.
- 3.37 As indicated in Section 3, the scale of reduction in comparison goods retail capacity projections within neighbouring authorities within the Core Area is modest when compared with total projections over plan periods. There is no evidence to suggest this impact would significantly delay or jeopardise planned investment in other town centres or result in a reduction in consumer choice.

## 4.0 **Sequential Approach**

### **National Guidance**

- 4.1 The NPPF (paragraph 23) states that local planning authorities should allocate a range of suitable sites to meet the need for town centre uses over the plan period. They should assess the need to expand town centres. If suitable town centre and edge-of-centre sites cannot be identified then other accessible locations that are well connected to town centre should be allocated. For plan making the sequential approach is linked to the need identified.
- 4.2 For plan making, if there is no need for the proposed development then there is no requirement to consider sequential sites or allocations. If the Council concludes there is a need for the proposed development, then the nature of the need the development seeks to serve will influence where that development should be located, i.e. the area of search for the sequential approach and the type and size of site required to meet that need.
- 4.3 The Practice Guidance advises that, in plan-making, the sequential approach requires a thorough assessment of the suitability, viability and availability of locations for main town centre uses. It requires clearly explained reasoning if more central opportunities to locate main town centre uses are rejected.

### **NLP Analysis**

#### **Area of Search**

- 4.4 The key objective of the development proposals is to provide a major tourist destination in Mid Devon that acts as a gateway attraction, accessible to the M5 where it can capture passing tourist trade. Given these objectives, we consider that the relatively wide (30 minute drive time) area of search is appropriate and robust.

#### **Flexibility and Disaggregation**

- 4.5 The NPPF and NPPG are silent in relation to flexibility and disaggregation in relation to how the sequential test should be used for plan-making. In relation to planning applications the NPPF indicates that applicants/developers must demonstrate flexibility on issues such as scale and format. The NPPF indicates that sequential sites should be capable of accommodating the proposals.
- 4.6 Two recent legal decisions shed light on what is meant by "flexibility" within the NPPF.
- 4.7 The Tesco Stores Ltd v Dundee City Council legal decision (21 March 2012 in the Supreme Court) provides guidance on the sequential approach, as indicated in MRPP's paragraphs 3 and 4). The decision states:

*"it is the proposal for which the developer seeks permission that has to be considered when the question is asked whether no suitable site is available within or on the edge of the town centre" (paragraph 37).*

4.8 The decision also states that the exercise of applying the sequential test, should be directed:

*"to what the developer is proposing, not some other proposal which the planning authority might seek to substitute for it which is for something less than that sought by the developer" (paragraph 38).*

4.9 Whilst this judgment indicates there is still a need to apply flexibility when devising a proposal, having regard to the particular local circumstances and how this might influence the format, design and scale of the development (paragraph 28), it also notes (paragraph 38) that proposals are generated by:

*"a developer's assessment of the market and that the criteria of flexibility and realism are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest in doing so".*

4.10 A more recent Secretary of State call-in decision in Rushden, East Northampton is of particular interest because it addresses sequential and Dundee decision matters. NLP's understanding of this decision is as follows:

- applicants are not required to disaggregate their application proposals when applying the sequential approach i.e. they only need to look at sites that can accommodate the whole development and they don't need to split various elements of the scheme; and
- flexibility relates to format and scale but does not mean the developer should reduce the size of development e.g. it could mean multi-level development or reduced car parking, but not significant reduction in the size of units proposed.

4.11 Given that the NPPF/NPPG guidance on flexibility and the case law decisions on flexibility/disaggregation relate to the determination of planning applications rather than plan making, NLP does not accept that the Council cannot consider the scope to disaggregate or change the content of the proposed development at EW, when considering the appropriateness of a plan allocation.

4.12 It is for the Council to decide how the identified need should be met and the degree to which the development can or can't be disaggregated when applying the sequential approach for plan making.

4.13 As indicated in other sections of this report, NLP accepts that there is synergy between the proposed tourist attraction, themed hotel, restaurants, cafés and Food Hall, and therefore it would not be appropriate to disaggregate these uses and seek to accommodate these elements on separate sites.

4.14 The DOV has less synergy with the proposed tourist attraction, but the co-location of these uses will be beneficial to each other in terms of spin-off trade and linked trips.

- 4.15 The other uses proposed are not main town centre uses and the sequential approach does not apply, so the issue of disaggregation is not relevant. There is no reason for the logistics/B8 distribution centre to be linked to the other elements of the proposal. The traveller service area also appears to be inextricably linked to the motorway junction location.
- 4.16 In terms of flexibility on format, CBRE acknowledges that some of the retailing could be two storey, and that a town centre site may not require car parking. CBRE discounts the car parking area from the sequential search. However NLP believes that it unlikely that a tourist attraction of this scale would be viable without some degree of car parking. In this respect CBRE's approach is robust.
- 4.17 CBRE has not identified the minimum size of site required to accommodate the development within the sequential assessment.
- 4.18 If all proposed main town centre uses i.e. the tourism, leisure and retail elements are taken as a whole then a site area of about 28 hectares would be required, or about 24 hectares if the DOV is removed.

### **Assessment of Sequential Sites**

- 4.19 CBRE has identified and assessed a number of sites within and near the six town centres identified in the area of search. The majority of sites have been discounted by CBRE are being too small for the proposals.
- 4.20 CBRE has identified a number of other sites that are large enough to accommodate the DOV if it is disaggregated, but these sites are allocated for alternative uses or mixed use development, and therefore these sites are considered to be unsuitable and unavailable for the proposed EW development, as follows:

#### **Town Centre Sites**

- 1 Cricket Club/Cold Orchard/Morrison's – Taunton;
- 2 Tangier/Tesco/Wood Street – Taunton;
- 3 East and West of High Street – Taunton;

#### **Out of Centre Sites (with potential links to town centres)**

- 4 Farleigh Meadows – Tiverton;
- 5 Blundells School – Tiverton;
- 6 Howden Court – Tiverton;
- 7 Well Parks – Crediton;
- 8 Exhibition Road – Crediton;
- 9 Pedlerspool, Exhibition Road – Crediton; and
- 10 Littleham Plum Park – Exmouth.

4.21 CBRE has identified a number of other sites that are large enough to accommodate the DOV and the tourist attraction, but again these sites are allocated for alternative uses or mixed use development, and therefore these sites are considered to be unsuitable and unavailable for the proposed EW development, as follows:

**Out of Centre Sites (with potential links to town centres)**

- 1 Development at Cranbrook – East Devon;
- 2 Urban Extension at Pinhoe – Exeter;
- 3 Goodmores Farm – Exmouth; and
- 4 Liverton Business Park – Exmouth.

4.22 There are a number of other sites that have not been considered by CBRE, which need further consideration.

4.23 A number of the sites proposed for allocation for mixed use within the Submission Version of the Local Plan Review document have not been considered by CBRE. NLP has assessed these sites below.

**Bus and Coach Station, Exeter**

4.24 CBRE states that this site is capable of accommodating 30,000 sq.m of retail floorspace as part of a mixed use scheme including leisure and housing. CBRE discounts the site on the basis it is not large enough to accommodate the other elements of the scheme.

4.25 CBRE considers that this site is capable of accommodating 30,000 sq.m of retail floorspace as part of a mixed use scheme including leisure and housing, but discounts the site on the basis that, whilst it could potentially accommodate the level of retail floorspace proposed at EW, it is not large enough to accommodate the other elements of the scheme. This has not been clearly demonstrated by CBRE, particularly in relation to the DOV.

4.26 A planning application has now been submitted for this site (3.3ha). The proposals includes the bus and coach station fronting Paris Street, Bude Street and Cheeke Street together with Numbers 1 to 29 Paris Street inclusive and 188 Sidwell Street, which are proposed for demolition.

4.27 The outline planning application (ref: 15/0791/01) submitted to Exeter City Council is for:

*“Demolition of existing buildings at Exeter bus and coach station, no. 188 Sidwell Street and nos 1-29 Paris Street for a comprehensive retail-leisure led mixed use development comprising Use Classes A1, A2, A3, A4, A5 [retail including food and drink uses], D1 and D2 [assembly and leisure] and including a new Leisure Centre and a new bus station, with associated access, landscaping and public realm works.”*

- 4.28 The application comprises between 19,500 – 21,000 sq.m of new floorspace. The site is too small to accommodate the proposed tourist attraction and probably too small to accommodate the DOV in isolation.
- 4.29 The submitted planning application is a good indication of the developers' intention to develop the land, therefore the site cannot be considered available for the DOV. This site is not sequentially preferable.

### **Eastern Urban Extension of Tiverton**

- 4.30 This is a 153 hectare site (65 hectares net) to the east of Tiverton was allocated in the Allocations and Infrastructure DPD 2010, and is being rolled forward into the Local Plan Review. The emerging policy criteria indicate mixed use development including 30,000 sq.m of commercial floorspace and some 47ha of green infrastructure. The development is expected to provide community facilities to meet local needs arising, including a new primary school and neighbourhood centre. The site was a
- 4.31 A Masterplan SPD has also been adopted that provides guidance on how the urban extension should be designed and developed. Planning permission for the first phase of development (330 dwellings) was granted 18 September 2015.
- 4.32 The Masterplan SPD explains that the 30,000 sq.m of commercial floorspace allocated at East Tiverton is likely to be in the form of employment floorspace. The proposed neighbourhood centre is likely to provide local shops and services. A DOV would not serve local needs generated by the urban extension.
- 4.33 Even if the land allocated for commercial site was to include the DOV floorspace and/or a tourist attraction, this location would be out-of-centre, around three kilometres from Tiverton town centre. The NPPF indicates that preference should be given to accessible sites that are well connected to the town centre. This site is better connected to the town centre than the EW site, but is still not within reasonable walking distance of the centre. The EW site is less accessible to the town centre, but provides better connectivity in terms of accessibility for tourists from the Junction 27 and Tiverton Parkway station.
- 4.34 The urban extension site does not appear to be available for the EW proposals (as the urban extension is being progressed). The proposed EW development can only be accommodated in this location if the current allocation is radically changed, which is likely to result in a reduction in dwellings accommodated.

### **North West Cullompton**

- 4.35 This is a 95 hectare site (60 hectares net) to the North West of Cullompton is allocated in the Allocations and Infrastructure DPD 2010 for residential-led mixed use development (1,200 dwellings) and is being rolled forward into the Local Plan Review. The commercial floorspace allocation is 21,000 sq.m, which will include a care home or retirement complex, and other suitable uses

such as a hotel or leisure development. A masterplan for this area was adopted by the Council in February 2016. This allocation cannot accommodate the proposed tourist attraction or the DOV.

- 4.36 At an average density of 30 dwellings per ha, 40ha of the site is required to accommodate the housing. This would leave 20ha net available for other uses, which could in theory accommodate the tourist attraction or the DOV, but would leave only a small area for employment floorspace.
- 4.37 In addition the Local Plan allocation includes large areas of green infrastructure which split the allocation into two separate areas. The southern part of the allocation is reasonably well related to the town centre, but it only extends to 15ha, and therefore could not accommodate the EW development proposed, notwithstanding the fact that the topography of the site might also make it unsuitable for such a scale of proposal.
- 4.38 This location is unsuitable and unavailable for the EW proposals and is therefore not sequentially preferable for the EW. The proposed EW development can only be accommodated in this location if the current allocation is radically changed, which is likely to result in a reduction in dwellings accommodated.

### **East Cullompton**

- 4.39 This is a 160 hectare site (96 hectares net) to the East of Cullompton is a proposed allocation in the Local Plan Review (Proposed Submission) for mixed use development including 2,100 dwellings (plus 500 dwellings post 2033) and 20,000 sq.m of commercial floorspace (plus 12,000 sq.m post 2033). The commercial space will include a care home or retirement complex, and other suitable uses such as a hotel or leisure development. Retail development will need to be of an appropriate scale to meet local needs. This description of the proposed commercial floorspace allocation suggests the site cannot accommodate the proposed tourist attraction or the DOV.
- 4.40 At an average density of 30 dwellings per ha, 70ha of the site would be required for the proposed housing, or 87ha including the post 2033 allocation. Assuming 2,100 dwellings only, the remainder of the proposed allocation (26 hectares net) could in theory accommodate the EW proposals.
- 4.41 The Local Plan Review indicates that development in Cullompton is severely constrained by the limited capacity at Junction 28 of the motorway. The development proposals are expected to enable junction improvements. The provision of highways infrastructure is fundamental to the delivery of development in this area. The viability of this objective would be questionable if a tourist attraction was promoted on a large part of the allocation, therefore this site may be unsuitable for the proposed tourist attraction.
- 4.42 This development opportunity appears to be unavailable for the proposed EW development, in terms of compatibility with the proposed allocation for the site. On this basis the site would not be considered to be sequentially preferable.

The proposed EW development can only be accommodated in this location if the proposed allocation is radically changed.

## **Conclusion**

4.43

Taking in to account the original sequential assessment undertaken by CBRE and this additional analysis of allocated site now undertaken, NLP concludes that there are no sequentially preferable alternative sites that could accommodate the development proposed.

## 5.0 **Viability**

### **Introduction**

5.1 EW suggests that the Designer Outlet Village is inextricably linked to the Westwood Ark proposal, because it cross-subsidises the financing of the Ark. In effect the DOV is proposed as enabling development that will make the tourist attraction deliverable and viable.

5.2 The term 'enabling development' is not a statutory one. It generally refers to development that would otherwise be considered harmful but is considered acceptable because it would facilitate (or 'enable') benefits that outweigh that harm.

5.3 The NPPF does not specifically refer to the viability of development proposals, and only refers to enabling development where it is required to secure the future of heritage assets. It does not refer to enabling development required to make other forms of development viable. However, the NPPF does not appear to rule out enabling development for other forms of development, and it is possible enabling development could be a material consideration in certain circumstances. The case for enabling development and the benefits to the public interest would need to be compelling.

### **NLP's Analysis**

5.4 The key issue relates to the proposed DOV and employment development. We do not believe that sufficient evidence has been presented to demonstrate the DOV or employment uses should be included within a plan allocation as required enabling development.

5.5 Evidence from the Eden Project in Cornwall suggests that such ambitious projects can rely heavily on charitable donations and grant funding in order to be developed and sustained.

5.6 Only a broad review of the development and revenue costs has been put forward by EW, which suggests some degree of cross subsidy may be required. Estimates of build costs and completed value have been provided to demonstrate a profit or loss for each element of the development. This information suggests the tourist related elements and the hotel make a loss. This loss is offset by profit generated by the DOV, employment uses and services. The building costs would need to be validated by quantity surveyors and the values generated by a specialist valuation surveyor.

5.7 If the cost and values are taken at face value then the values of the tourist related uses, excluding the hotel only, cover just over a third of the costs. The funding gap appears to be significant.

- 5.8 Based on the figures provided, the profit generated by the DOV would close about 90% of the funding gap. With the employment uses making up the remainder.
- 5.9 More detailed evidence is needed to clearly demonstrate the DOV and employment land should be permitted as enabling development or that the scale of development proposed is the minimum required to cross subsidise the proposed tourist attraction.
- 5.10 The necessary and compelling evidence required, would need a full open book financial appraisals that clearly shows the tourist attraction is unviable without the quantum of proposed enabling development, and that any harm caused by the enabling development would be outweighed by the overall benefits of the development.
- 5.11 Whether the DOV and employment development could be reduced in size and still prove sufficient to subsidise the rest of the EW project would require more detailed figures.
- 5.12 Based on the figures provided, the development could still break even if the DOV was reduced in size by 40%. However we agree there would be a minimum size or critical mass required to make the Designer Outlet Village a viable proposition in its own right.
- 5.13 Given that the enabling development/viability case for the DOV and employment development have not been clearly demonstrated, the Council need to consider whether the DOV and employment development is needed and acceptable in this location in isolation.
- 5.14 From NLP's review of the Town Centre Uses Statement, we conclude that there is a need for the tourism, hotel, leisure and convenience goods retailing elements proposed. NLP has not been instructed to consider the merits of the proposed employment related development.
- 5.15 On this basis, it is not necessary to demonstrate these elements of the proposal are financially required as enabling development, subject to meeting the sequential approach.
- 5.16 If the Council accepts that a compelling enabling development case has not been demonstrated then the DOV could still be included within the Plan allocation if the Council is satisfied NLP's analysis in other sections of this report demonstrate there is a need for the DOV and that the sequential approach has been satisfied.

## 6.0 Conclusions

- 6.1 NLP previously concluded that whilst the MDDC Submission Plan was not considered unsound by the omission of the EW scheme in the Plan. However, it was recognised that the EW proposal offers a significant opportunity for meeting tourism objectives in the Mid Devon Tourism strategy. A firm recommendation for an allocation could not be made however, on the basis of the information provided by CBRE in their representations to the Submission Plan.
- 6.2 Having undertaken the additional analysis missing from the original CBRE assessment, NLP can now conclude that the development is acceptable in terms of the impact and sequential tests.
- 6.3 In terms of implications for other local authorities and the Duty to Co-operate, NLP considers that the only discernible significant implications will be for Exeter City Council, Taunton Deane Borough Council and North Devon District Council.
- 6.4 In the case of Taunton Deane, the Council already acknowledge that their relevant DPD for retail allocations in Taunton town centre needs updating, and an adjustment to accommodate EW could be made at this time (anticipated 2016).
- 6.5 In terms of Exeter, the main development proposal in the Core Strategy – the redevelopment of the Bus Station has progressed to the planning application stage at a smaller quantum of floorspace than was envisaged in the DPD. Therefore EW would not compromise forward planning in the local authority area.
- 6.6 In relation to North Devon, the emerging Joint Local Plan provides a flexible approach to retail allocations in Barnstaple and it is considered that the diversion in floorspace need to an allocation at EW, which represents 5% of the District's total, would not be significant.
- 6.7 NLP therefore concludes that, if the Council seek to include EW as an allocation, this would not render the Plan unsound.

# Appendix 1 Quantitative Analysis



Table 1 - Trade Draw and Penetration Rate

Zone	Trade Draw	Trade Draw	Available Expenditure in Zone £M	Penetration Rate %
6	2.0%	£1.76	£1,249.6	0.1%
7	1.0%	£0.88	£1,026.1	0.1%
8	1.0%	£0.88	£793.7	0.1%
9	3.0%	£2.63	£794.6	0.3%
10	10.0%	£8.78	£898.6	1.0%
11	10.0%	£8.78	£654.6	1.3%
12	25.0%	£21.95	£315.4	7.0%
13	10.0%	£8.78	£460.3	1.9%
14	3.0%	£2.63	£124.3	2.1%
15	10.0%	£8.78	£868.0	1.0%
16	2.0%	£1.76	£449.5	0.4%
17	2.0%	£1.76	£1,211.8	0.1%
18	1.0%	£0.88	£1,766.3	0.0%
Other	20.0%	£17.56		
<b>Total</b>	<b>100.0%</b>	<b>£87.80</b>		



Table 2: Trade Diversion by Zone

Local Authority	Retail Centre	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Zone 13	Zone 14	Zone 15	Zone 16	Zone 17	Zone 18
	<b>Zone 6</b>													
North Somerset	Portishead	5.0%												
	Weston-Super Mare	30.0%			10%									
	<b>Zone 7</b>													
Mendip	Frome		5%											
	Shepton Mallet		5%		2%									
South Somerset	Yeovil		30%	5%	2%	5%	5%							
	Babylon Retail Park		7%											
	<b>Zone 8</b>													
Weymouth & Portland	Weymouth			20%										
West Dorset	Dorchester			25%										
	Bridport			5%										
	<b>Zone 9</b>													
Sedgemoor	Bridgewater				15%	2%								
Mendip	Street				5%									
	Clarks Village Outlet Centre		6%		6%	2%								
	Wells				5%									
	<b>Zone 10</b>													
West Somerset	Minehead													
Taunton Deane	Taunton		5%		20%	60%	10%	15%						
	<b>Zone 11</b>													
South Somerset	Chard						5%							
East Devon	Exmouth						5%							
	Honiton						5%	10%						
	Sidmouth						5%							
	<b>Zone 12</b>													
Mid Devon	Tiverton							20%						
	Cullompton							3%						
	<b>Zone 13</b>													
North Devon	Barnstaple								65%	10%		30%		
	<b>Zone 14</b>													
North Devon	Chulmeigh													
Mid Devon	Crediton								15%					
	<b>Zone 15</b>													
Exeter City	Exeter		2%			6%	40%	45%	5%	55%	80%	20%	15%	
	<b>Zone 16</b>													
Torriford	Bideford											10%		
	Atlantic Village Factory Outlet Centre								10%			10%		
	<b>Zone 17</b>													
Torbay	Torquay												25%	1%
Teignbridge	Newton Abbott										5%		25%	1%
	<b>Zone 18</b>													
South Hams	Ivybridge													3%
Plymouth City	Plymouth											5%	10%	80%
West Devon	Tavistock													5%
Outside Catchment		65.0%	40%	45%	35%	25%	25%	7%	20%	20%	15%	25%	25%	10%
<b>Total</b>		100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%



Table 3: Trade Diversion - Turnover

Local Authority	Retail Centre	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Zone 13	Zone 14	Zone 15	Zone 16	Zone 17	Zone 18	Total
<b>Trade Draw from Zone</b>		<b>£1.76</b>	<b>£0.88</b>	<b>£0.88</b>	<b>£2.63</b>	<b>£8.78</b>	<b>£8.78</b>	<b>£21.95</b>	<b>£8.78</b>	<b>£2.63</b>	<b>£8.78</b>	<b>£1.76</b>	<b>£1.76</b>	<b>£0.88</b>	
	<b>Zone 6</b>														
North Somerset	Portishead	£0.09	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.09
	Weston-Super Mare	£0.53	£0.00	£0.00	£0.26	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.79
	<b>Zone 7</b>														
Mendip	Frome	£0.00	£0.04	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.04
	Shepton Mallet	£0.00	£0.04	£0.00	£0.05	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.10
South Somerset	Yeovil	£0.00	£0.26	£0.04	£0.05	£0.44	£0.44	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.24
	Babylon Retail Park	£0.00	£0.06	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.06
	<b>Zone 8</b>														
Weymouth & Portland	Weymouth	£0.00	£0.00	£0.18	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.18
West Dorset	Dorchester	£0.00	£0.00	£0.22	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.22
	Bridport	£0.00	£0.00	£0.04	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.04
	<b>Zone 9</b>														
Sedgemoor	Bridgewater	£0.00	£0.00	£0.00	£0.40	£0.18	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.57
	Street	£0.00	£0.00	£0.00	£0.13	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.13
Mendip	Clarks Village Outlet Centre	£0.00	£0.05	£0.00	£0.16	£0.18	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.39
	Wells	£0.00	£0.00	£0.00	£0.13	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.13
	<b>Zone 10</b>														
Taunton Deane	Taunton	£0.00	£0.04	£0.00	£0.53	£5.27	£0.88	£3.29	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£10.01
	<b>Zone 11</b>														
South Somerset	Chard	£0.00	£0.00	£0.00	£0.00	£0.00	£0.44	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.44
	Exmouth	£0.00	£0.00	£0.00	£0.00	£0.00	£0.44	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.44
East Devon	Honiton	£0.00	£0.00	£0.00	£0.00	£0.00	£0.44	£2.20	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£2.63
	Sidmouth	£0.00	£0.00	£0.00	£0.00	£0.00	£0.44	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.44
	<b>Zone 12</b>														
Mid Devon	Tiverton	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£4.39	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£4.39
	Cullompton	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.66	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.66
	<b>Zone 13</b>														
North Devon	Barnstaple	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£5.71	£0.26	£0.00	£0.53	£0.00	£0.00	£6.50
	<b>Zone 14</b>														
Mid Devon	Crediton	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.40	£0.00	£0.00	£0.00	£0.00	£0.40
	<b>Zone 15</b>														
Exeter City	Exeter	£0.00	£0.02	£0.00	£0.00	£0.53	£3.51	£9.88	£0.44	£1.45	£7.02	£0.35	£0.26	£0.00	£23.46
	<b>Zone 16</b>														
Torriford	Bideford	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.18	£0.00	£0.00	£0.18
	Atlantic Village Factory Outlet Centre	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.88	£0.00	£0.00	£0.18	£0.00	£0.00	£1.05
	<b>Zone 17</b>														
Torbay	Torquay	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.44	£0.01	£0.45
Teignbridge	Newton Abbott	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.44	£0.00	£0.44	£0.01	£0.89
	<b>Zone 18</b>														
South Hams	Ivybridge	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.03	£0.03
Plymouth City	Plymouth	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.09	£0.18	£0.70	£0.97
West Devon	Tavistock	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.04	£0.04
	<b>Outside Catchment</b>														
		£1.14	£0.35	£0.40	£0.92	£2.20	£2.20	£1.54	£1.76	£0.53	£1.32	£0.44	£0.44	£0.09	£13.30
<b>Total</b>		<b>£1.76</b>	<b>£0.88</b>	<b>£0.88</b>	<b>£2.63</b>	<b>£8.78</b>	<b>£8.78</b>	<b>£21.95</b>	<b>£8.78</b>	<b>£2.63</b>	<b>£8.78</b>	<b>£1.76</b>	<b>£1.76</b>	<b>£0.88</b>	<b>£70.24</b>



Table 4: Impact at 2022 and 2024

Local Authority	Retail Centre	Trade Diversion £m	Turnover 2022 £m (CBRE est. pro-rata)	2022 Impact on Turnover %	Turnover 2024 £m (CBRE estimate)	2024 Impact on Turnover %
<b>Zone 6</b>						
North Somerset	Portishead	£0.09	£27.02	0.32%	£29.60	0.30%
	Weston-Super Mare	£0.79				
<b>Zone 7</b>						
Mendip	Frome	£0.04	£86.55	0.05%	£94.80	0.05%
	Shepton Mallet	£0.10	£42.09	0.23%	£46.10	0.21%
South Somerset	Yeovil	£1.24	£446.64	0.28%	£489.20	0.25%
	Babylon Retail Park	£0.06	£48.51	0.13%	£52.90	0.12%
<b>Zone 8</b>						
Weymouth & Portland	Weymouth	£0.18	£165.62	0.11%	£181.40	0.10%
West Dorset	Dorchester	£0.22	£241.49	0.09%	£264.50	0.08%
	Bridport	£0.04	£57.59	0.08%	£62.80	0.07%
<b>Zone 9</b>						
Sedgemoor	Bridgewater	£0.57	£105.09	0.54%	£115.10	0.50%
Mendip	Street	£0.13	£61.63	0.21%	£67.50	0.20%
	Clarks Village Outlet Centre	£0.39	£61.90	0.62%	£67.80	0.57%
	Wells	£0.13	£41.27	0.32%	£45.00	0.29%
<b>Zone 10</b>						
Taunton Deane	Taunton	£10.01	£527.64	1.90%	£575.40	1.74%
<b>Zone 11</b>						
South Somerset	Chard	£0.44	£34.24	1.28%	£37.50	1.17%
East Devon	Exmouth	£0.44	£38.44	1.14%	£42.10	1.04%
	Honiton	£2.63	£53.14	4.96%	£58.20	4.53%
	Sidmouth	£0.44	£40.62	1.08%	£44.30	0.99%
<b>Zone 12</b>						
Mid Devon	Tiverton	£4.39	£74.23	5.91%	£81.30	5.40%
	Cullompton	£0.66	£12.75	5.17%	£13.90	4.74%
<b>Zone 13</b>						
North Devon	Barnstaple	£6.50	£363.22	1.79%	£396.10	1.64%
<b>Zone 14</b>						
Mid Devon	Crediton	£0.40	£24.83	1.59%	£27.20	1.45%
<b>Zone 15</b>						
Exeter City	Exeter	£23.46	£1,002.46	2.34%	£1,093.20	2.15%
<b>Zone 16</b>						
Torrige	Bideford	£0.18	£37.89	0.46%	£41.50	0.42%
	Atlantic Village Factory Outlet Centre	£1.05	£5.41	19.47%	£5.90	17.86%
<b>Zone 17</b>						
Torbay	Torquay	£0.45	£213.09	0.21%	£233.40	0.19%
Teignbridge	Newton Abbott	£0.89	£280.97	0.32%	£306.40	0.29%
<b>Zone 18</b>						
South Hams	Ivybridge	£0.03	£28.67	0.09%	£31.40	0.08%
Plymouth City	Plymouth	£0.97	£1,015.26	0.10%	£1,112.00	0.09%
West Devon	Tavistock	£0.04	£112.39	0.04%	£123.10	0.04%
<b>Inflow</b>						
		£17.56				
<b>Total</b>						
		£74.50				



Table 5: Impact on Floorspace Allocations

Local Authority	Retail Centre	Trade Diversion £M	Turnover density £ per sq m	Equivalent Comparison Goods floorspace (sq m net)	Equivalent Comparison Goods floorspace (sq m gross)
North Somerset	Portishead	£0.09	£5,500	16	
	Weston-Super Mare	£0.79	£5,500	144	
	<b>Subtotal</b>	<b>£0.88</b>		<b>160</b>	<b>213</b>
Mendip	Frome	£0.04	£5,500	8	
	Shepton Mallet	£0.10	£5,500	18	
	<b>Sub-Total</b>	<b>£0.14</b>		<b>26</b>	<b>34</b>
South Somerset	Yeovil	£1.24	£5,500	225	
	Babylon Retail Park	£0.06	£5,500	11	
	<b>Sub-Total</b>	<b>£1.30</b>		<b>236</b>	<b>315</b>
Weymouth & Portland	Weymouth	£0.18	£5,500	32	
	<b>Sub-Total</b>	<b>£0.18</b>		<b>32</b>	<b>43</b>
West Dorset	Dorchester	£0.22	£5,500	40	
	Bridport	£0.04	£5,500	8	
	<b>Sub-Total</b>	<b>£0.26</b>		<b>48</b>	<b>64</b>
Sedgemoor	Bridgewater	£0.57	£5,500	104	
	<b>Sub-Total</b>	<b>£0.57</b>		<b>104</b>	<b>138</b>
Mendip	Street	£0.13	£5,500	24	
	Clarks Village Outlet Centre	£0.39	£5,500	70	
	Wells	£0.13	£5,500	24	
	<b>Sub-Total</b>	<b>£0.65</b>		<b>118</b>	<b>158</b>
Taunton Deane	Taunton	£10.01	£5,500	1,820	
	<b>Sub-Total</b>	<b>£10.01</b>		<b>1,820</b>	<b>2,426</b>
South Somerset	Chard	£0.44	£5,000	88	
	<b>Sub-Total</b>	<b>£0.44</b>		<b>88</b>	<b>117</b>
East Devon	Exmouth	£0.44	£5,500	80	
	Honiton	£2.63	£5,500	479	
	Sidmouth	£0.44	£5,500	80	
	<b>Sub-Total</b>	<b>£3.51</b>		<b>639</b>	<b>851</b>
Mid Devon	Tiverton	£4.39	£5,500	798	
	Cullompton	£0.66	£5,500	120	
	<b>Sub-Total</b>	<b>£5.05</b>		<b>918</b>	<b>1,224</b>
North Devon	Barnstaple	£6.50	£5,500	1,181	
	<b>Sub-Total</b>	<b>£6.50</b>		<b>1,181</b>	<b>1,575</b>
Mid Devon	Crediton	£0.40	£5,500	72	
	<b>Sub-Total</b>	<b>£0.40</b>		<b>72</b>	<b>96</b>
Exeter City	Exeter	£23.46	£5,500	4,265	
	<b>Sub-Total</b>	<b>£23.46</b>		<b>4,265</b>	<b>5,687</b>
Torridge	Bideford	£0.18	£5,500	32	
	Atlantic Village Factory Outlet Centre	£1.05	£5,500	192	
	Tavistock	£0.04	£5,500	8	
	<b>Sub-Total</b>	<b>£1.27</b>		<b>231</b>	<b>309</b>
Torbay	Torquay	£0.45	£5,500	81	
	<b>Sub-Total</b>	<b>£0.45</b>		<b>81</b>	<b>109</b>
Teignbridge	Newton Abbott	£0.89	£5,500	161	
	<b>Sub-Total</b>	<b>£0.89</b>		<b>161</b>	<b>215</b>
South Hams	Ivybridge	£0.03	£5,500	5	
	<b>Sub-Total</b>	<b>£0.03</b>		<b>5</b>	<b>6</b>
Plymouth City	Plymouth	£0.97	£5,500	176	
	<b>Sub-Total</b>	<b>£0.97</b>		<b>176</b>	<b>234</b>







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