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Mid Devon Local Plan Review 2013 – 2033

Proposed Submission (incorporating proposed modifications) Examination in Public

Hearing 1:
Policy J.27
(26/09/2017)

Issues 1, 5, 6 and 7

Parties: Mid Devon District Council
Friends Life Ltd
The Eden Project

Date: August 2017

Contents

Appendices

Signatures

Signature

……………………………………

Tony Clements, Planning Director
GL Hearn on Behalf of Friends Life Limited and The Eden Project

Signature

……………………..

On behalf of Mid Devon District Council

Acronyms

MDDC:	Mid Devon District Council
FLL:	Friends Life Limited (c/o Aviva Investors Global Services Limited)
Eden:	The Eden Project
MDLPR:	Mid Devon Local Plan Review Proposed Submission (incorporating proposed modifications) January 2017
SoCG:	Statement of Common Ground
NPPF	National Planning Policy Framework
PPG:	National Planning Practice Guidance
LPA:	Local Planning Authority
HoSW LEP:	Heart of the South West Local Enterprise Partnership
WTO	World Tourism Organisation
MMDMP	Mid Devon Destination Management Plan 2017
MDTS	Mid Devon Tourism Study 2014
TAP	The Department for Culture Media & Sport: Tourism Action Plan (August 2016)

1 EXECUTIVE SUMMARY

1.1 This joint statement of common ground (SoCG) has been prepared by MDDC, FLL and Eden in relation to the MDLPR. It is prepared in the context of the preliminary hearings taking place on 26 and 27 September 2017 relating to Hearing 1: Policy J27: Land at Junction 27 of the M5 Motorway.

1.2 This SoCG relates specifically to Issues 1, 5, 6 and 7 of the Inspector's Matters and Issues [ref. ID02] and, unless explicitly stated otherwise, outlines matters of agreement between MDDC, FLL and Eden (in respect of Issue 1). The SoCG is intended to assist the Inspector during the Examination.

1.3 Mid Devon occupies a strategic location between Exeter and Taunton accessibility to the area from the rest of the UK is strong as a consequence of the motorway network and mainline rail connections. The J27 allocation would introduce a regionally significant and exemplary leisure and tourism destination. It is estimated that *c.* 3 million visitors would visit the destination per year; increasing investment and expenditure in Mid Devon and the region; and presenting opportunities for linked trip benefits.

1.4 As set out within this SoCG it is neither necessary nor practical to seek to quantify an exact need for a particular scale of tourist attraction as doing so would fail to recognise the extremely diverse nature of the tourism industry. The scale of the attraction is a product of the ambition to make a step-change in the tourism-offer in Mid Devon. The multi-faceted nature of the offer also seeks to trade on a range of factors that have redolence both for the region and for the type of attraction that is being sought: namely a cohesive scheme that will appeal across ages, abilities and interests.

1.5 The synergy between the OSV and the other leisure and tourism related elements of the allocation must be considered in the context of the objective to deliver a collection of different activities which allows visitors to engage in a 'complete day out' to exploit the opportunity identified within the MDTS. The OSV forms a core component of the leisure and tourism offer described within Policy J27 and a 'clear synergy' therefore exists between the OSV and the various elements described within Policy J27.

1.6 The OSV forms a component of the multi-faceted offer that has been developed in order to deliver the type of attraction that is being sought. The OSV is; therefore, a necessary component of the wider strategic objective to deliver a major tourist attraction that has a critical mass of things to do and stop for. A 'Financial Viability Report' (August 2016) has been prepared by FLL and this concludes that without an OSV the development would not be viable.

2 INTRODUCTION

2.1 This joint statement of common ground (SoCG) has been prepared by Mid Devon District Council (MDDC), Friends Life Limited (FLL) and The Eden Project (Eden) (in respect of issue 1) in relation to the Mid Devon Local Plan Review 2013-2033 Proposed Submission (incorporating proposed modifications) Examination (MDLPR). It is prepared in the context of the preliminary hearings taking place on 26 and 27 September 2017 relating to Hearing 1: Policy J27: Land at Junction 27 of the M5 Motorway.

2.2 This SoCG relates specifically to Issues 1, 5, 6 and 7 of the Inspector's Matters and Issues [ref. ID02] and, unless explicitly stated otherwise, outlines matters of agreement between MDDC, FLL and Eden (in respect of Issue 1). The SoCG is intended to assist the Inspector during the Examination.

3 REFERENCES

3.1 The following relevant national and local planning policy, guidance documents, publications, and evidence base documents inform the allocation of land at Junction 27 of the M5 Motorway in the MDLPR and are relevant to the Inspector's Issues 1, 5, 6 and 7.

3.2 Due to the breadth of relevant national tourism related publications this SoCG draws upon key Government strategies and initiatives. Further publications will be referenced by each party in its respective Hearing Statements relating to Matter 1 (Junction 27) and a summary of key national, regional and local objectives is provided in Appendix A to this SoCG.

Document	Date/ Reference
National Level	
National Planning Policy Framework	March 2012
National Planning Practice Guidance	Updated 28 July 2017
Department for Culture Media & Sport Publications:	
- Backing the Tourism Sector: A Five Point Plan July 2015	July 2015
- The Tourism Landscape May 2016	May 2016
- Tourism Action Plan August 2016	August 2016
Visit Britain: Tourism Planning Guidance	2017
Visit Britain: Other Relevant Publications and Guidance	
- Delivering a Golden Legacy – A growth strategy for inbound tourism to Britain from 2012 to 2020	April 2013
- A Strategic Action Plan for Tourism 2010-2020 – Rural Tourism Action Plan	-
Visit England: Other Relevant Publications and Guidance	
- A Strategic Framework for Tourism 2010-2020	2011
- Domestic Leisure Tourism Trends for the Next Decade	December 2013
- The Value of Activities for Tourism	-
Tourism Alliance Publications:	
- UK Tourism Statistics 2017	2017
- Tourism After Brexit 2017	2017
World Tourism Organisation	
- Global Report of Shopping Tourism	2014
Regional Level	
Heart of the South West LEP	-
Heart of the South West LEP Strategic Economic Plan	March 2014
Joint Exeter and Heart of Devon Economic Strategy 2017-2020	November 2016

Local Level	
Destination Management Plan for Mid Devon Tourism (Draft)	November 2016
Mid Devon Visitor Survey Report November 2016	December 2016
The Economic Impact of Mid Devon's Visitor Economy and Evidence Base 2015.	October 2016
Mid Devon Corporate Plan 2016 to 2020	-
Mid Devon Tourism Study November 2014	November 2014
Evidence prepared by FLL	
- Sir Tim Smit Forward April 2015	April 2015
- A Major Tourism and Leisure Opportunity Narrative April 2015	April 2015
- Eden Westwood: Food Farming and Life in Devon	February 2017
- Eden Westwood Socio Economic Benefits August 2016	August 2016
- Town Centre Uses Statement April 2016 and August 2016	April 2016 and August 2016
- Leisure Impact Assessment April 2015 and August 2016	April 2016 and August 2016

4 ISSUE 1: IS THE EVIDENCE BASE SUFFICIENTLY ROBUST TO DEMONSTRATE A NEED FOR THE SCALE OF THE TOURIST ATTRACTION PROPOSED?

Context: National Planning Policy Framework

4.1 The allocation of land at Junction 27 of the M5 Motorway (Policy J27) as set out in the draft Local Plan accords with the Government's clear aim to support economic growth.

4.2 In this regard the NPPF places great weight on supporting economic growth through the planning system. It confirms that the Government is committed to securing economic growth as a means of creating jobs and prosperity; building on the country's inherent strengths; and ensuring that the planning system does everything it can to support economic growth (NPPF, Para. 18-21). Paragraph 21 of the NPPF confirms that investment in business should not be overburdened by planning policy expectations and planning policies should seek to address potential barriers to investment.

4.3 The NPPF, at paragraph 17, sets out the core land-use planning principles that underpin both plan-making and decision-taking. This confirms that, amongst other land use principles, planning should be genuinely plan-led setting out a positive vision for the future of the area. Planning should be a creative exercise in finding ways to enhance and improve the places in which people live their lives. Planning should not should not simply be about scrutiny, but should proactively drive and support sustainable economic development[1]

4.4 In rural areas, the NPPF (para. 28) states that planning policies should support economic growth in order to create jobs and prosperity by taking a positive approach to sustainable new development. In doing so Local Plans should:

> *"Support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres"*

4.5 Retail, leisure and tourism uses fall within the NPPF definition of a 'main town centre use'. This states:

> *"Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)."*

[1] NPPF, paragraph 17, bullet point 3

4.6 In accordance with paragraph 23 of the NPPF, amongst other requirements, in preparing its Local Plan MDDC should meet the need for retail, leisure, office and other main town centre uses in full and ensure that delivery is not compromised by limited site availability. In addition, MDDC should set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres.

4.7 While the definition of main town centre uses includes reference to 'leisure' and 'tourism' development, the examples in the definition do not explicitly conform to the type of leisure and tourism uses described within the J27 allocation. For example, uses such as the outdoor activities (surf lake and adventure areas) would not neatly fall within a 'main town centre use' nor is there any suggestion within the NPPF or PPG that such uses should be classified as town centre uses.

Planning for Tourism

4.8 Tourism is "extremely diverse and covers all activities of visitors"[2]. The World Tourism Organisation definition of tourism states:

> *"Tourism comprises the activities of persons traveling to and staying in places outside their usual environment for not more than one consecutive year for leisure, business and other purposes."*

4.9 The PPG[3] provides clear guidance on how LPAs should articulate a vision for tourism in its Local Plan, including identifying optimal locations for tourism. This states:

> *"When planning for tourism, local planning authorities should:*
>
> - *consider the specific needs of the tourist industry, including particular locational or operational requirements;*
> - *engage with representatives of the tourism industry;*
> - *examine the broader social, economic, and environmental impacts of tourism;*
> - *analyse the opportunities for tourism to support local services, vibrancy and enhance the built environment; and*
> - *have regard to non-planning guidance produced by other government departments.*
>
> *Local planning authorities may also want to consider guidance and best practice produced by the tourism sector. Further guidance on tourism can be found on the Visit England website."*

4.10 The non-planning guidance referenced within the PPG would include, but is not limited to, guidance and best practice produced by other Government bodies, The Tourism Alliance, The World Tourism Organisation, Visit Britain and Visit England. This SoCG makes reference to the guidance and best practice produced by other Government departments and the tourism sector. To assist the

[2] PPG Paragraph 007, Reference ID: 2b-007-20140306.
[3] PPG Paragraph 007, Reference ID: 2b-007-20140306.

Inspector a brief summary of relevant publications referenced in this SoCG is provided at Appendix A.

Need for Tourism-related Development:

4.11 While tourism uses are categorised within the NPPF as a Main Town Centre use, the notion of 'need' when planning for tourism related development does not fit easily into a conventional assessment of planning for town centre uses, as set out within PPG and the NPPF. Tourism extends beyond the narrow definition contained with the NPPF; indeed the Government recognises that tourism is a dynamic and rapidly evolving sector and therefore to ensure that opportunities to promote growth and innovation are not lost, the regulatory framework (in all senses) should be kept under review to allow common-sense to prevail when promoting sectoral growth[4].

4.12 In this regard the most pertinent piece of guidance is contained within the PPG as summarised in paragraphs 4.8 and 4.9 of this SoCG. The 'need' for tourism-related development is informed by the national, regional and local context within which the tourism sector sits. When considering need the policy maker must take account of national, regional and local objectives[5].

4.13 The third core planning principle listed in paragraph 17 of the NPPF states that every effort should be made to objectively identify and then meet the housing, business and other development needs of an area but in addition to this objective, the same principle requires LPAs to *"respond positively to wider opportunities for growth"* when plan-making and decision-taking. There is nothing in the NPPF to suggest that assessed need should be treated an upper limit on proposed development; such a scenario would be contrary to the presumption in favour of sustainable development.

MDLPR Submission Documents

4.14 The following paragraphs expand upon the evidence base documents submitted to the MDLPR Examination.

SOC06: MDDC: Our Corporate Plan 2016-2020

4.15 MDDC's Corporate Plan 2016 to 2020 sets out the vision and priorities for Mid Devon. The Vision: 'Making the most of Mid Devon', is followed by four key priorities: economy; homes; community and environment. Economic aims of the Corporate Plan include:

- Attract new businesses to the District: focusing on particular sectors and their supply chain, including leisure and tourism.

[4] Department for Culture Media & Sport Backing the Tourism Sector: A Five Point Plan July 2015; and Department for Culture Media & Sport: Tourism Action Plan August 2016.
[5] See Appendix A.

- Focus on business retention and growth of existing businesses: working with education providers and business groups to improve skills training and improve local economic vitality.
- Improve and regenerate Mid Devon's town centres with the aim of increasing footfall, dwell-time and spend in town centres.
- Grow the tourism sector: increasing the number of people visiting, staying and spending money in Mid-Devon and improving the marketing of Mid Devon as a visitor destination.
- Work in partnership with the Heart of the South West Local Enterprise Partnership, Devon County Council and Exeter, East Devon and Teignbridge on projects that will support and grow the local economy.
- Be proactive in bringing in funding to the District to support economy projects.
- Be more entrepreneurial and commercial as a Council.

4.16 The allocation of land at Junction 27 for a major leisure destination themed around agriculture and the agri-economy represents a major opportunity to deliver a unique leisure and tourism destination at the gateway to Devon and Cornwall. The allocation is consistent with Priority 1 of the Corporate Plan.

4.17 The allocation would introduce a regionally significant and exemplary leisure and tourism destination. It is estimated that *c.* 3 million visitors would visit the destination per year[6]; increasing investment and expenditure in Mid Devon and the region; and presenting opportunities for linked trip benefits. FLL estimates that the development will provide *c.* **1,200 new FTE** jobs[7].

ECO05: Mid Devon Tourism Study 2014

4.18 MDDC commissioned its Mid Devon Tourism Study (MDTS) in 2012 to inform the preparation of the MDLPR and to explore how, in accordance with bullet point 3 of paragraph 28 of the NPPF, tourism and tourism infrastructure within Mid Devon could be developed to support economic growth. The MDTS, which was published in November 2014, was prepared in the context of the Government's National Tourism Strategy (March 2011), which seeks to increase tourist numbers – from both at home and overseas – and to improve productivity to make the sector more competitive. The following objectives are contained within the National Tourism Strategy (2011):

- To fund the most ambitious marketing campaign ever to attract visitors to the UK in the years following 2012 which aims to attract 4 million extra visitors to Britain over the next 4 years and the creation of 50,000 new jobs;
- To increase the proportion of UK residents who holiday in the UK to match those who holiday abroad each year; and
- To improve the sector's productivity to become one of the top 5 most efficient and competitive visitor economies in the world.

4.19 Importantly, while this strategy was published by the Conservative and Liberal Democrat coalition government (2010-2015), its aims are consistent with the Department for Culture Media & Sport's

[6] CBRE Forecasting likely footfall, June 2016
[7] Eden Westwood Socio Economic Benefits August 2016

Five Point Plan (July 2015) and Tourism Action Plan (August 2016) as summarised in Appendix A of this SoCG. Indeed, the latter strategies place an even greater emphasis on the Government's objective to spread the benefits that tourism brings beyond the capital city and out into the regions. The Government's Tourism Action Plan opens with a foreword from the Prime Minister which acknowledges that "*Tourism is vitally important to the UK"* and there is a commitment from the Prime Minister that *"We must do everything we can to make sure that visitors are encouraged to explore beyond the capital*". The Tourism Action Plan states that improving transport links and modernising the connections to the countryside both by road and public transport are priorities (p12). It also promotes the value of food and links to DEFRA's Great British Food Campaign.

4.20 The MDTS contains analysis of Mid Devon's existing tourism offer based on data provided by secondary sources including the Visit England – Local Authority Analysis of Accommodation (2010); The GB Tourism Study (2011); The Heart of Devon Tourism Partnership (2011); and data provided by other tourism providers. In addition, the Tourism Study reflects on primary research undertaken with key stakeholders (research undertaken in 2013) in the tourism industry. The MDTS comprises an evidence base document informing the MDLPR and it should be read in the context of the national, regional and local planning and non-planning guidance and statistics prevalent at this time.

4.21 As described elsewhere within this SoCG the 'need' for additional tourism-related development cannot be assessed and identified on a purely – or even primarily - quantitative basis. Not only would this be inconsistent with the diverse nature of tourism as defined by the WTO, it is also impractical having regard to the wide variety of factors that influence what is needed in order to encourage people to visit, stay and spend in a particular location. The MDTS therefore, combines qualitative and quantitative research to inform its recommendations and these are made in the context of the clear national, regional and local commitment to improve the tourism offer in order to boost the economy[8]. The overall approach to the MDTS is sound and appropriate in the context of national planning and non-planning guidance.

4.22 The MDTS recognises within the Conclusions Section that the key tourism assets within the District comprise the three main market towns; the natural environment and green infrastructure for which the County is known more widely; and the important strategic routes by road and rail that pass through the district (M5 and A361 are specifically mentioned), which carry high volumes of tourist traffic through the district on route to destinations further afield within the South West peninsula. There is recognition that the District functions as a 'gateway' to regional attractions such as Exmoor and the North Devon coast; Dartmoor and South Devon and to the whole of Cornwall for visitors from the majority of the UK and for most international visitors.

[8] See Appendix A of this SoCG.

4.23 It further recognises that the existence of these routes and the high number of visitors that pass along them on their way to visit other destinations provides a key opportunity to create tourism infrastructure that will capture/intercept visitors to the region and persuade them to stop and experience attractions that the District can offer more widely. The MDTS recommends a multi-faceted approach to attracting visitors. Across a series of six identified 'strands', a number of themes are developed that are carried forward directly and indirectly into the J27 Policy:

- Delivery of a major facility/attraction exploiting the excellent strategic location offered by the confluence of mainline rail and road infrastructure (Tiverton Parkway/M5 J.27/A361) within the District;
- Development of a tourism facility showcasing local food and produce;
- Alongside the provision of a major facility/attraction the clustering of associated services to include 'active-activities', retail space, places to eat and drink, and visitor accommodation to encourage longer dwell times;
- Nurturing the food offer – showcasing the food offer that the region/district has and providing opportunities to experience locally-produced food through eating and drinking and purchasing. Providing outlets for locally produced goods across all categories;
- Developing the accommodation offer to encourage overnight stays within the district and to capitalise on the location of key transport routes passing through. Create a reason to stop and experience what Mid Devon has to offer. There is a particular opportunity to provide accommodation close to the M5 and A361 in pursuit of this objective;
- Develop the tourism over across a range of sectors to cater for a variety of age-groups and needs to target potential growth in spending, particularly in the over-35 age groups.

4.24 The MDTS identifies a number of key opportunities (strands) to develop the tourism infrastructure within Mid Devon. In addition to meeting the key themes summarised above, the allocation of land at Junction 27 would directly address the following identified opportunities:

- Strand 2: Developing the Accommodation Offer
- Strand 5: Catching Passing Tourists/ Major Tourist Facility
- Stand 6: Fun for the Kids

4.25 The MDTS's conclusions are based on sound reasoning informed by secondary and primary research sources. While the data informing the conclusions contained within the MDTS are dated 2011 and 2013, the findings are validated by the Economic Impact of Mid Devon's Visitor Economy and Evidence Base (October 2016) and the Mid Devon Visitor Survey Report (December 2016). Notably, the following conclusions are consistent across all three reports:

- Mid Devon occupies a strategic location between Exeter and Taunton and accessibility to the area from the rest of the UK is strong as a consequence of the motorway network and mainline rail connections[9].
- Visitor spend in Mid Devon is lower than any other areas in Devon[10].
- Mid Devon attracts an increasingly aging visitor population[11].

[9] ECO05 (MDTS) paras 1.12, 3.15 5.20, 6.20, 6.11-6.14; and MDVS SWOT Analysis p.9.
[10] ECO05 (MDTS) paras 3.28-3.32; and. MDVS SWOT Analysis p.9.

- Longer holiday trips in Mid Devon are decreasing while short (day visit) trips are increasing[12].
- There is an opportunity to provide a year round destination.[13]

4.26 While the MDTS does not seek to quantify the scale of tourism offer that is needed in the district in order to increase spend levels or dwell time, Strand 5 clearly advocates a development offer – i.e. an 'opportunity' - very similar to that which is now being allocated under Policy J27. As set out within this SoCG it is neither necessary nor practical to seek to quantify an exact need for a particular scale of tourist attraction as doing so would fail to recognise the extremely diverse nature of the tourism industry,

SSE10: J27 Westwood Leisure Destination Impact Assessment (July 2014) prepared by Colliers International

4.27 DOC REF. SSE10: the Westwood Leisure Destination Impact Assessment (LIA), was prepared by Colliers International on behalf of FLL and relates to a previous iteration of FLL's development proposal prior to FLL's partnership with Eden. The scheme composition at that time included a 'major visitor destination'; a commercial logistics park; and a retirement village. While the overall scheme composition is not directly consistent with Policy J27, the strategic principles, and the concept and objective to provide a unique leisure destination at the heart of the south west, remains relevant. Further, the components within the visitor destination (including the reef, indoor family attraction and visitor centre) are not dissimilar to the development composition as described within Policy J27 and thus the conclusions contained within the report remain relevant.

4.28 The LIA prepared by Colliers International on behalf of FLL was updated in April 2015 and again in August 2016. Both of the updated versions have been submitted to the MDLPR Proposed Submission consultations in April 2015 and February 2017 respectively. The overall conclusions contained within these two reports are consistent with DOC REF. SSE10.

4.29 The April 2015 report has been independently critiqued by Nathanial Lichfield and Partners (NLP) (see below).

SSE15: Critique of Retail and Leisure Statement. Nathaniel Lichfield and Partners. 17 July 2015

4.30 DOC REF. SSE15 was commissioned by MDDC and prepared by NLP prior to the inclusion of Policy J27 in the MDLPR and sets out NLP's independent critique of the proposed allocation in relation to its appropriateness as a retail, leisure and tourist destination. The report critiques the

[11] ECO05 (MDTS) paras. 3.36, 3.39, 5.6, 6.16; and MDVS SWOT Analysis p.9.
[12] ECO05 (MDTS) paras. 3.39; and MDVS SWOT Analysis p.9.
[13] ECO05 (MDTS) paras. 5.21, paras. 6.11-6.14, para 6.16; and MDVS SWOT Analysis p.9.

evidence base documents prepared by FLL and submitted to the Proposed Submission Consultation in April 2015.

4.31 The July 2015 NLP report recognises the 'significant opportunity' to address strands 2 and 6 of the MDTS through the allocation of land at Junction 27. It further recognises that the MDLPR as drafted in 2015 did not have a clear vision for tourism in Mid Devon. The NLP report accepts that the allocation of land at Junction 27 for tourism proposals is an appropriate approach to tourism in the Plan period. These conclusions are based on sound and justified reasoning having regard to national planning policy and guidance and form a sufficiently robust evidence base to inform the preparation of the MDLPR.

4.32 The allocation composition is a whole package and the tourism components are largely financially dependent on the retail and hotel elements of the scheme. Further information in this regard is provided under Issues 5, 6 and 7 of this SoCG.

SSE16: Critique of Retail and Leisure Statement 07 March 2016; and SSE17: Retail Response 19 July 2016

4.33 DOC REFS. SSE16 and SSE17 were commissioned by MDDC and prepared by NLP and should be read in conjunction with the July 2015 NLP report. The reports were commissioned primarily to consider the quantitative need for the retail elements of the allocation and this is considered further within the SoCG for Issues 2, 3, 4 and 8.

4.34 The conclusions contained within doc refs. SSE16 and SSE17 do not change the conclusions reached within the July 2015 NLP (SSE15) relating to the appropriateness of the tourism proposals.

Need for the Scale of the Tourist Attraction Proposed

4.35 The MDTS recognises that Mid Devon occupies a strategic location between Exeter and Taunton and that accessibility to the area from the rest of the UK is strong as a consequence of the motorway network and mainline rail connections. Tourism forms an important component of the local economy: in 2015 tourism accounted for 5% of the proportion of all employment, representing 1,505 FTE and 2,084 of actual employment. Total visitor related spend amounted to £101,133,000[14].

4.36 However, there is recognition that tourism in Mid Devon is relatively low compared to other areas in Devon and this reflects the lack of major visitor attractions. Mid Devon's day visit spend is

[14] The Economic Impact of Mid Devon's Visitor Economy and Evidence Base 2015

calculated as accounting for only 6% of the County's day visit expenditure. This is despite the fact that Mid Devon is predominantly a day visit destination[15].

4.37 The evidence base supporting the MDLPR[16] recognises that there is currently a missed opportunity to exploit the development/inward investment opportunity presented by the strategic location alongside Junction 27 of the M5. The allocation of land at Junction J27 in the MDLPR is, therefore, a targeted and positive response to the challenge of attracting more visitors to the district and increasing the economic spin-offs from tourism and this is consistent with the guidance contained within the PPG that LPAs should articulate a 'vision' for tourism within the Local Plan, including identifying optimal locations for tourism development.

4.38 In order to make a step change in its tourism offer MDDC must be bold in the offer of its future tourism product if it is to successfully compete in the market and support economic growth. Eden, as the creator of an existing major tourism destination within the south west (The Eden Project, St Austell), is able to draw upon its own experiences in this regard and further information is contained within FLL's Hearing Statements relating to Matter 1.

4.39 In order to address strands 5 and 6 of the MDTS, a 'critical mass of things to do or stop for' is required and this is important to attract visitors to stop and spend money. Similarly, developing an all-weather offer and facility with an appeal across a range of visitor groups requires an innovative and bespoke product. In order the make an impact and to 'put Devon on the map' the objective must be to provide a 'major' tourism destination that can successfully compete in the market. The scale of the tourist attraction is, therefore, informed by this objective.

4.40 Further, the allocation of land at Junction 27 of the M5 is strongly consistent with the themes and objectives within the SEP, which recognises from the outset that the attraction and promotion of new business is vital to the success of region, and that the exceptional environmental qualities that the LEP area possesses (with Devon at its heart) will help to provide the 'lifeblood' to support the key established agricultural and tourism sectors on which the success of the region so heavily depends.

4.41 It is neither necessary nor practical to seek to quantify an exact need for a particular scale of tourist attraction as doing so would fail to recognise the extremely diverse nature of the tourism industry, the many variables that influence the tourism sector, and the development required to improve an area's attractiveness to visitors. Determining what scale of attraction would be needed in order to

[15] Mid Devon Visitor Survey Report November 2016
[16] ECO05, SSE15, SSE16, and SSE17

achieve that objective is not something that can be calculated in a quantitative way, but requires the exercise of judgment and an understanding of locational and operational requirements[17].

Locational and Operational Considerations

4.42 Visit Britain recognises that "to really ensure success, planning is essential" and provides the following guidance in respect of planning for tourism:

> *"Sustainable rural tourism and leisure development is an important part of a prosperous rural economy and is recognised by the NPPF, but rural development has some specific considerations to take into account. Tourism developments might not be possible in the tightly drawn boundaries of market towns and villages and a need might arise for facilities in countryside attractions, or areas of outstanding natural beauty, which are a long way from the main services of an area."*
>
> *"In order to be commercially successful, tourism sites must be easily accessible for visitors and where possible should enable sustainable travel…"*
>
> *"Many accommodation businesses want it to be easy for customers to reach them by car. The NPPF recognises that different policies and measures will be required in different communities, and that opportunities to maximise sustainable transport solutions will vary from urban and rural areas."*

4.43 As described above, the scale of the proposed tourist attraction proposed for allocation at Junction 27 is informed by the opportunity described within the MDTS[18] for MDDC to exploit its strategic location between Taunton and Exeter with the mainline railway and M5 motorway running through the district, and accessibility from the regional airports at Exeter and Bristol. A significant volume of tourists pass through Mid Devon on route to other destinations such as North and South Devon, and Cornwall.

4.44 Land at Junction 27 of the M5 Motorway, which sits at the gateway to Devon and Cornwall, adjacent to the principal road and rail routes running from the North East Triangle down through the Heart of the South West into the Western Peninsula, is a uniquely accessible transport node that provides a regional opportunity to expand on growth in the tourism sector by getting tourists to stop in Mid Devon and to increase length of time and spend in the District. Its strategic location presents an opportunity for a significant proportion of visitors to stop off at J27 on the way to or from other destinations such as Torbay, North Devon or Cornwall increasing spend within the regional economy.

4.45 The scale of the attraction is a product of the ambition to make a step-change in the tourism-offer in Mid Devon. The multi-faceted nature of the offer also seeks to trade on a range of factors that have redolence both for the region and for the type of attraction that is being sought: namely a cohesive

[17] Visit Britain: Planning for Tourism 2017 https://www.visitbritain.org/tourism-planning-guidance
[18] Mid Devon Tourism Study 2014, paras. 1.2, 5.20, 6.20, and 6.11-6.13

scheme that will appeal across ages, abilities and interests; temporally and geographically. The scale is, therefore, informed by the objective to create a collection of different uses and activities that combine to offer individual or linked attractions depending on the nature and length of the visit being considered.

Policy J27 has been developed, in accordance with the guidance within the PPG, to ensure that MDDC's Vision and ambition for developing the tourism economy in Mid Devon is understood by the scheme promoters.

5 ISSUE 5: IS THERE A 'CLEAR SYNERGY' BETWEEN THE OUTLET SHOPPING VILLAGE (OSV) PROPOSAL AND THE TOURISM AND LEISURE ELEMENTS OF THE PROPOSED ALLOCATION?

5.1 The 'synergy' between the OSV and the other tourism and leisure elements of Policy J27 must be considered in the context of MDDC's ambition to make a step-change in the tourism-offer in Mid Devon as described in this SoCG (Issue 1).

5.2 The development composition described within Policy J27 seeks to trade on a range of factors that are reminiscent of both the region and for the type of attraction that is being sought at Junction 27: namely a cohesive scheme that has a 'critical mass of things to do or stop for'[19], and that will appeal across ages, abilities and interests[20]. The synergy between the OSV and the other leisure and tourism related elements of the allocation must, therefore, be considered in the context of the objective to deliver a collection of different activities which allows visitors to engage in a 'complete day out'.

5.3 The PPG[21] recognises that tourism is extremely diverse and covers all activities of visitors. In respect of shopping, data generated between 2009 and 2011 from the International Passenger Survey[22] about activities engaged in by international inbound visitors to the UK identify that that the principal activity undertaken by international tourists visiting the UK in the period was shopping. What is clear is that shopping is a leisure and tourism activity.

5.4 The PPG also refers to the WTO, which produces guidance, data reports and publications focussing on the development and management of tourism across all sectors and international markets. The Global Report on Shopping Tourism (AM Reports Vol.8) dated 2014 recognises the role that shopping has as a component of the tourism sector. The foreword to the report by the Secretary General of the WTO states:

> *"Shopping has converted into a determinant factor affecting destination choice, an important component of the overall travel experience and, in some cases, the prime travel motivation. Destinations have thus an immense opportunity to leverage this new market trend by developing authentic and unique shopping experiences that add value to their touristic offer, while reinforcing and even defining their tourism brand and positioning. More importantly, shopping is one of the major categories of tourists' expenditure, representing a significant source of income for national economies both directly and through the many linkages to other sectors in the economy."*

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[19] MDTS para. 6.13.
[20] MDTS Strands 5 & 6.
[21] PPG Paragraph 007, Reference ID: 2b-007-20140306
[22] Office for National Statistics

5.5 Further, the report recognises[23] that while leisure has always acted as one of the primary motivating factors behind travel, shopping has increasingly become recognised as a leisurely activity and one that helps to drive tourism. The report explains that increasingly shopping occupies a greater space in the destination management agenda and therefore should be considered as an integral part of planning for tourism activity.

5.6 Outlet shopping in particular has more in common with leisure day trips than standard shopping trips. OSV visits are typically more 'speculative' due to limited stock availability so that the extended but much less frequent journey (quarterly rather than weekly to a town centre) is often packaged with complementary leisure, cultural and social activities. OSVs typically have high quality, traffic free environments with an emphasis on leisure and are increasingly combining with other leisure uses. Many visitors to OSVs consider themselves to be on 'a day out' rather than responding to everyday shopping needs. Site accessibility also forms a core component with ideal positioning being close to a motorway junction, in a large catchment population, and with strong local tourism potential.

5.7 As well as high-end brand line ups, these 'destinations' are strongly integrated within local tourism circuits. Key features include onsite tourism offices, public transport links, strong food and beverage provision, complementary leisure activities, coach parks (with driver facilities), year round events, shuttle buses to hotels / local railway stations, marketing at key points of entry / places of stay, a specialist tourism role in the centre management team and packaged deals with local hotels and attractions. In this regard the Inspector's attention is drawn to Appendix B, which provides website hyperlink examples for a number of UK and international sites.

5.8 The development composition described in Policy J27 provides visitors with opportunities to not only span a number of activities during a single visit, but also for individuals to divide across preferred activities. It is this opportunity that is clearly recognised within the MDTS.

5.9 Having regard to the above the OSV forms a core component of the leisure and tourism offer described within Policy J27 and a 'clear synergy' therefore exists between the OSV and the various elements described within Policy J27.

[23] Paragraph 1.4

6 ISSUE 6: IF THERE IS A NEED FOR THE SCALE OF TOURIST AND LEISURE ELEMENTS PROPOSED, WHY IS THE OSV NECESSARY?

6.1 The 'need' for the scale of the tourism and leisure elements proposed is described elsewhere in this SoCG. In summary, the scale of the attraction is a product of the ambition to make a step-change in the tourism-offer in Mid Devon. The evidence base supporting the MDLPR[24] recognises that there is currently a missed opportunity to exploit the development/inward investment opportunity presented by the strategic location alongside Junction 27 of the M5. The allocation of land at Junction J27 in the MDLPR is, therefore, a targeted and positive response to the challenge of attracting more visitors to the district and increasing the economic spin-offs from tourism and this is consistent with the guidance contained within the PPG that LPAs should articulate a 'vision' for tourism within the Local Plan, including identifying optimal locations for tourism development.

6.2 The OSV forms a component of the multi-faceted offer that has been developed in order to deliver the type of attraction that is being sought: namely a cohesive scheme that will appeal across ages, abilities and interests in order to respond to the opportunity recognised within the MDTS as summarised above. Therefore, when considering the necessity of the OSV it is important to remember that the OSV is not only a facilitator to the delivery of other leisure and tourism elements described within Policy J27, but also forms a component of the destination itself.

6.3 A large proportion of tourist attractions within the UK are operating with subsidy from the public sector. Most new attractions are developed with assistance of capital funding from sources such as the national lottery (mainly via the Heritage Lottery Fund) and the European Regional Development Fund (ERDF). The Eden Project, for example, was delivered by financial assistance from the Millennium Commission, and the EU and UK Government via the South West Regional Development Agency. Similarly, Surf Snowdonia, which is the first example of an artificial surf lagoon in the UK, was part-funded by Welsh Government[25]. MDDC is unable to rely upon this type of funding to exploit the opportunity recognised within the MDTS and to make a step-change in the tourism-offer in Mid Devon.

6.4 The NPPF, paragraph 154, makes clear that Local Plans should be "aspirational but realistic". To be found sound, the Local Plan must be positively prepared, justified, effective and consistent with national policy[26]. It is important, therefore, that the J27 allocation is based on a proportionate evidence base and is deliverable over the Plan period. In this regard a 'Financial Viability Report' (August 2016) has been prepared by FLL and it has subsequently been subjected to an independent audit by Savills (commissioned by MDDC). The Viability Report concludes that without

[24] ECO05, SSE15, SSE16, and SSE17
[25] Tourism Investment Scheme
[26] NPPF paragraph 182.

an OSV the development (as per the allocation) would not be viable and this has been reiterated in the independent audit undertaken by Savills. However, inclusion of the OSV would lead to a development composition that would be considered to have an appropriate site value for the landowner in accordance with published guidance on the financial viability in planning process whilst allowing for an appropriate developer's profit for this type of development. Accordingly Policy J27 as proposed would be deliverable. Further information in this regard is set out in this SoCG in response to Issue 7, and the aforementioned Viability Report is appended at **Appendix C.**

6.5 Having regard to the above, in response to the Inspector's question 'Why is the OSV necessary?':

- The OSV forms a component of the multi-faceted offer that has been developed in order to deliver the type of attraction that is being sought. The OSV is; therefore, a necessary component of the wider strategic objective to deliver a major tourist attraction that has a critical mass of things to do and stop for; and
- The OSV is necessary to assist in the delivery (in financial viability terms) of the allocation in the plan period.

7 IF THE OSV IS NECESSARY TO ENABLE OR MAKE VIABLE THE TOURIST AND LEISURE ELEMENTS OF THE PROPOSAL, WHERE IS THE EVIDENCE THAT AN OSV (OR RETAIL ALLOCATION) OF THE SCALE PROPOSED, WITH ITS ATTENDANT EFFECTS, IS NECESSARY?

7.1 FLL commissioned GL Hearn (GLH) to prepare a Financial Viability Report (August 2016) in support of the proposed allocation of land at Junction 27 and at the request of Mid Devon District Council (MDDC). The core functions of the report were to demonstrate that the emerging allocation proposals are deliverable and to confirm that notwithstanding the functional synergy between the OSV and the other tourism/leisure proposals, the OSV is required to enable the delivery of the less viable tourism and leisure components.

7.2 This report was submitted to MDDC in August 2016 on a confidential basis owing to the sensitivity underpinning the financial details disclosed within the report. In response to the Inspector's Question (Issue 7), it has been agreed to publish the Report in its original form as submitted to MDDC. The Report is hereby enclosed at **Appendix C.**

7.3 The Viability Report is considered to be a proportionate and appropriate evidence base to inform the allocation of land at Junction 27 and to demonstrate that enabling development in the form of a fully functional OSV (comprising the quantum of retail floorspace set out within Policy J27) is justified.

7.4 MDDC has sought to further test the soundness of the Viability Report and has commissioned Savills to independently review the Viability Report. Although Savills arrived at different conclusions on some of the inputs and assumptions contained in the Viability Report, they ultimately conclude that the OSV is critical to the delivery of the other scheme components. Therefore while there is some variance in professional judgement between Savills and GLH, the same conclusions arise in both assessments, thereby proving that the viability case for the OSV is sound.

APPENDIX A: ISSUE 1: SUMMARIES OF RELEVANT NATIONAL, REGIONAL AND LOCAL PUBLICATIONS

National Context

Department for Culture Media & Sport Backing the Tourism Sector: A Five Point Plan July 2015

The Department for Culture Media & Sport Backing the Tourism Sector: A Five Point Plan (July 2015) sets out the Government's commitment to grow the tourism industry, spreading the benefits of its growth across the country. The five point plan includes:

1. Tourism Landscape: Increased investment in tourism and changes in Governance.
2. Skills and Jobs: Improved access to information and support in order to attract and retain talent.
3. Common Sense Regulation: Endorsement of a clear sensible and proportionate regulatory framework to ensure that common sense prevails and opportunities to protect and grow the tourism sector are not missed.
4. Transport: Support projects that increase the rail, road and air capacity.
5. A GREAT Welcome: Improve service standard to the visitor visa regime.

The Plan further recognises the importance of tourism to the economy as a whole, with almost 1 in 10 jobs in the UK being supported by the sector. A key objective within the Plan is to attract and retain talent and to support businesses which are driving growth in the tourism sector. The Government also understands that because tourism is a dynamic and developing area, with new business models emerging all the time, the regulatory framework that impacts on how tourism is promoted and delivered should be kept under review.

Department for Culture Media & Sport: The Tourism Landscape May 2016

Department for Culture Media & Sport: The Tourism Landscape was published in May 2016 and announced a number of changes to strengthen co-ordination and collaboration across the tourism landscape. The publication states:

"The overall success of the tourism industry is contingent on its ability to work together to promote what it has to offer. However, as the sector is diverse, fragmented and competitive, business are often reluctant to invest significant time and collaborative endeavours. This is why Government support is needed."

Department for Culture Media & Sport: Tourism Action Plan August 2016

The Department for Culture Media & Sport: Tourism Action Plan (August 2016) (TAP) updates and expands upon the Five Point Plan following the UK's decision to leave the EU in 2016. The TAP reiterates the Government's commitment to the five points: the tourism landscape, skills, common sense regulation, transport and A GREAT welcome. Within the TAP Prime Minister Theresa May states:

"The British people's decision to leave the European Union creates many great opportunities for growth, such as cutting red tape and forging partnerships in new and developing markets. Our stunning scenery hasn't changed, nor our centuries-old monuments and cultural traditions. Together with industry, the Government will work to ensure that tourism continues to thrive as negotiations on the UK's exit progress. The end goal is a Britain that is even more attractive, accessible and welcoming to visitors."

Visit England: A Strategic Action Plan for Tourism 2010-2020

A Strategic Action Plan for Tourism 2010-2020 was published by Visit England in 2011. The vision is to maximise tourism's contribution to the economy, employment and quality of life in England. It targets an annual 5% growth in the tourism sector and aims to achieve through the following objectives:

- To increase England's share of global visitor markets;
- To offer visitors compelling destinations of distinction.
- To champion a successful thriving tourism industry.
- To facilitate greater engagement between the visitor and the experience.

The Strategic Action Plan for Tourism states:

"Tourism needs and deserves greater recognition for its positive impact. As a major foreign exchange generator, tourism is an 'invisible export industry' and it makes substantial tax contributions. It is an excellent route into employment at all levels and across the country. It is fertile ground for entrepreneurs and with continued growth, tourism is one of the few industries that will create new employment opportunities. It provides many economic and social benefits to local communities. It has a key role to play in shaping both national and international opinion of England…" (p.03)

"There are challenges regarding perceptions and understanding of the visitor economy. It suffers from a lack of visibility at various levels of Government resulting in a legislative framework unsupportive to its development, for example, the restrictions imposed by planning legislation. Communications from the industry also need to be improved, emphasising with consistency the importance of tourism, the challenges it faces and the opportunities it has to grow." (p.08)

"Tourism's strengths and potential must be championed to a number of interdependent sectors such as farming, transport, construction, planners and policy makers. Establishing and nurturing these relationships will build national recognition and support. It is crucial that the value of tourism is understood by all those who have a role to play…" (p.15)

"A successful tourism industry creates new employment opportunities throughout the country and the success of the industry depends on a skilled workforce. It is critical that the industry can promote itself as a viable career option as well as retain and develop its current workforce. Tourism is a flexible and versatile sector to work in and offers a superb range of entry level opportunities for school leavers, for people without formal qualifications, for those re-entering the workforce and for part-time or temporary employees." (p.15)

Visit England: 'Rural Tourism Action Plan'

The report aims to improve the potential of the rural tourism offer and bring benefits to local communities and economies. The report proposes the following to diversify and enhance rural tourism:

- Develop existing and new visitor activities and experiences that are less weather dependent, appeal to visitors throughout the year and reflect and support the local area (i.e. not imported in);
- Develop traditional and new low impact and low carbon products and experiences in rural areas informed by consumer trends and behaviours (e.g. walking, cycling, glamping, tepees, yurts, camping huts and shielings; slow tourism; outdoor concerts; museums and parks at night) and suited to local environments and communities; and
- Increase the promotion of England's rural offer and experiences by using new media and other marketing techniques to engage younger audiences.

Regional Context

Heart of South West LEP

Mid Devon falls within the geography of the Heart of the South-West Local Enterprise Partnership (HoSW LEP). The HoSW LEP's Business Plan focuses on working collaboratively with partners to deliver its vision of creating more sustainable jobs by supporting and promoting opportunities and capitalising on the unique opportunities of the area.

Heart of South West LEP Strategic Economic Plan

The SEP recognises that the HoSW has the largest tourism economy of any of the 39 LEPs with 26.7mn visitor nights per annum (p.4). The area is also home to 13,000 commercial farm holdings (50% of all farms in the South West), which form an integral part of the wider rural economy and which have close links to food and drink that is produced in the region and tourism generally.

Its key objectives are to drive productivity and enterprise; attract business and investment; maximise employment opportunities; and promote infrastructure to connect with markets. The LEP's Core Aims for Growth, which are interdependent and central to the strategy comprise:

- Creating the conditions for growth – supporting infrastructure and connectivity;
- Maximising productivity and employment – stimulating jobs and growth across the whole economy to benefit all sectors, including tourism, agriculture and food and drink; and
- Capitalising on distinctive assets – to create higher value growth and better jobs.

These aims transfer to a vision for growth that includes a commitment to recognising the importance of the environment, tourism, agri-food and land-based industries, with tourism, agriculture and food and drink acknowledged as the 'bedrock' sectors of the economy.

Joint Exeter and Heart of Devon Economic Strategy 2017-2020

The Exeter and Heart of Devon Economic Partnership, which comprises Exeter City Council, East Devon District Council, Mid Devon District Council and Teignbridge District Council, has endorsed "A shared strategy for economic growth and prosperity 2017-2020". The strategy, which was endorsed in February 2017, emphasises the importance of Exeter and Heart of Devon as an economic hub and focus for growth within Devon. The strategy recognises that the M5 Corridor is one of three overlapping functioning economic market areas (FEMAS) within the South West Region. Tourism is recognised within the strategy as a strength and opportunity to promote inward investment and workforce relocation[27] .

The strategy is informed by four economic initiatives: business transformation; inward investment; employment and skills; and strategic planning and infrastructure. These are illustrated on p.15 of the strategy where Junction 27 is identified as a common economic development objective within the Mid Devon District.

Local Context

Destination Management Plan for Mid Devon Tourism (Draft)

The draft Mid Devon Destination Management Plan (MDDMP) was presented to MDDC's Economy Policy Development Group Committee on 19 January 2017 and subsequently to Cabinet on 02 February 2017. The draft MDDMP sets out MDDC's commitment to achieving a competitive and sustainable tourism sector which increases the contribution tourism makes to the local economy over the next five years. The MDDMP has been prepared to reflect data received from the South West Research Company and Visit England as well as

[27] Joint Exeter and Heart of Devon Economic Strategy 2017-2020 p.15

comments from Mid Devon Attractions and accommodation providers (see below). The MDDMP identifies three key objectives to promote tourism in the District.

- To create partnerships to enable a joint approach to growth
- To develop a brand and promotional strategy to create regional and national awareness
- To develop the local offer to create a competitive product which meets our target segment needs.

The MDDMP identifies the leisure and tourism opportunities at Junction 27 as a new product and marketing opportunity.

Mid Devon Visitor Survey Report November 2016

The Mid Devon Visitor Survey 2016 was prepared by The South West Research Company (TSWRC) on behalf of MDDC. It examines the findings of the visitor survey undertaken by TSWRC between May and October 2016. The report includes the following statistical findings as to the current position in Mid Devon:
Mid Devon is predominantly a day visit destination.

- The main visitor market for the district appears to be those people living within the immediate South West region.
- Mid Devon largely appeals to adult only groups with just over three quarters visiting the district without children (68%) and to those visitors falling into the middle (45-54 years) and older (55+ years) age groups who accounted for 58% of all visitors.
- The district attracts a high proportion of repeat visitors across all visitor types.

The Economic Impact of Mid Devon's Visitor Economy and Evidence Base 2015

The Economic Impact of Mid Devon's Visitor Economy and Evidence Base 2015 was prepared by TSWRC on behalf of the Devon Tourism Partnership. It examines the volume and value of tourism and the impact of visitor expenditure on the local economy in Mid Devon and Devon. The statistics contained within the report are derived using the Cambridge Economic Impact Model undertaken by TSWRC. The report identified the following key findings:

- Mid Devon is the least visited district compared to the Devon districts indicating there is plenty of room to grow the sector.
- The main reason domestic visitors come to Mid Devon (day trips and staying) is for a holiday or leisure time. While for overseas visitors the main reason is to visit friends and relatives. Local connections are, therefore, an important motivator even for overseas visitors.
- Food and drink has the largest direct spend by day visitors and domestic staying visitors in Mid Devon.

APPENDIX B: EXAMPLES OF OUTLET CENTRE WEB PAGES

UK Examples

Gloucester Quays – cinema, restaurants and harbour

http://www.gloucesterquays.co.uk/attractions/

Springfields – free public gardens, hotel and paid for leisure attractions

http://springfieldsshopping.co.uk/attractions/

Gunwharf Quays – historic naval dockyard museum, hotels, casino, nightclub, 10-pin bowling, restaurants and bars

https://gunwharf-quays.com/leisure/things-to-do-at-gunwharf-quays

Clarks Village – Shoe Museum and local attractions such as Glastonbury Abbey and Cheddar Gorge

https://www.clarksvillage.co.uk/tourism/local-attractions/

Cheshire Oaks – Local attractions such as Blue Planet Aquarium, Chester City Centre and Chester Zoo

https://www.mcarthurglen.com/uk/cheshire-oaks-designer-outlet/en/tourism/

European Examples

Honfleur Normandy Outlet, France – under construction at the gateway to the historic port of Honfleur (3.5. million visitors annually)

http://www.honfleuroutlet.com/en/destination-exceptionnelle.php

Valmontone Outlet, near Rome, Italy – Next to Rainbow Magicland theme park

http://www.valmontoneoutlet.com/area/?lang=en

Designer Outlet Wolfsburg, Germany – Phaeno Science Centre and district attractions

https://www.designeroutlets-wolfsburg.de/en/attraktionen/

Batavia Stat, Netherlands – District attractions

https://www.bataviastad.nl/en/plan-your-visit/cultural-highlights/

Kildare Village, Ireland – Local and district attractions

https://www.kildarevillage.com/en/your-visit/local-information/attractions/

APPENDIX C: FINANCIAL VIABILITY REPORT DATED 17 AUGUST 2016