



Sustainability Appraisal Consultation, 2018
Forward Planning
Mid Devon District Council
Phoenix House
Tiverton
EX16 6PP.

March 27th, 2018

Dear Forward Planning Team,

Sustainability Appraisal

In general, we support the very detailed and carefully considered sustainability proposal which has been carried out in the Sustainability Appraisal, and we continue to approve most aspects of the Revised Local Plan 2013-2033. However, we wish to comment on the section entitled 'Junction 27 Proposal. Options for Disaggregation and Location' on pages 39 to 42 of the Sustainability Update 2018, and to stress our opposition to the proposal to build a Designer Outlet Village (DOV) as part of the development at Junction 27.

Although we appreciate the potential benefit of a modest development related to tourism at Junction 27 we consider that the large scale of the 71- hectare development proposed is unsustainable and that its impact will be unacceptable because it will compromise the future health of the town centres in many settlements, including the neighbouring towns of Tiverton and Cullompton. There has been a significant reduction in the overall size of the proposed development since the original plans were drawn up, warehousing/logistics and the proposed cinema having been removed. However, plans for the provision of a six- hectare DOV consisting of a designer outlet shopping centre retailing controlled goods comprising discontinued/end-of-range lines, seconds and surplus/sample stock with up to 14,000 square metres of comparison floorspace and up to 2,000 square metres of A3 uses have been little changed and we consider that this would have a major impact on the retail hierarchy of the region.

- We continue to agree with the November 2014 GVA Report, commissioned by Mid Devon District Council

The final paragraph of this report concludes:

'Overall, and notwithstanding the lack of proper information and analysis, we have reached the conclusion that the current proposed allocation has the potential to materially affect the role and function of existing centres in the local retail hierarchy. We reach this conclusion based upon the scale and breadth of the main town centre uses proposed, many of which are to be found in existing centres in the retail hierarchy. Whilst it would be unreasonable to completely exclude the provision of main town centres to support an outdoor leisure facility at the subject site, the scale of uses proposed has not been justified and is likely to affect the health and function of other town centres through: the loss of market share, an adverse financial impact, the potential to impact upon investment and a general loss of vitality and viability.'

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- = We believe that the proposed development, especially the proposed DOV, is unsustainable as it is not compliant with National Planning Policy Framework Section 2, Paragraphs 23 and 24, which state that

Paragraph 23 states that "Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities shouldrecognise town centres as the heart of their communities and pursue policies to support their viability and vitality, and allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres" and that they should "allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre".

Paragraph 24 states that local planning authorities "should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre".

- A report by NLP in 2015 largely agreed with the GVA conclusions, considering the DOV proposal to be excessive in scale However, Mid Devon District Council asked them to carry out a further analysis in March 2016 which was included in an addendum critique.

In this critique NLP considered that there is theoretical capacity to support the DOV, due to growth in available expenditure in the Core Catchment Area (extending to Devon, Somerset and West Dorset), there not being enough capacity in Mid Devon alone. This means that some of the comparison retail needs of authorities within this wider area will be taken by the development, potentially undermining these authorities' ability to plan to meet their own needs in more sustainable locations. Despite this, NLP considers that there would be enough residual capacity to still meet the needs of these areas.

We disagree with this analysis. According to the CBI, high street sales are falling at their fastest rate since the height of the 2009 recession, there having been a record reduction in retail jobs in the third quarter of 2017. We consider that projections about future retail growth, especially in the comparison goods sector, need to be urgently revisited, including the modest forecasts of Experian. The current challenging trading environment throughout the country, has led to many recent bankruptcies, store closures and profit warnings in the high street retail sector, the decline in sales resulting from many factors including the rapid growth of online retailing, the squeeze on real incomes, higher business rates, and, in some cases, overwhelming competition from the development of new out-of-town outlets, perhaps the best known earlier example of the latter being Dudley. Moreover, there is little apparent prospect that these trading conditions are likely to improve in the foreseeable future, even with predicted, but not assured, population growth in the local region. We consider that a

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regional need for the DOV has not been established and it is obvious that there is already considerable retail spare capacity in the local region.

These and other reasons were admirably analysed by Alice Thomson, referring to Tiverton town centre, in The Times on January 17th.

- A point which requires further clarification/investigation is the nature of the proposed controls that will be placed on the comparison retail floorspace, i.e. required to sell discontinued/end-of range lines, seconds and surplus/sample stock, and the impact these will have (both positive and/or negative).

Whereas MDDC envisage these controls will help to minimise impacts on town centres selling similar comparison goods, it is considered likely that the DOV will demonstrate a price advantage over these centres due to the reduced prices placed on goods. Indeed, it is not considered that the proposed controls would differentiate the retail floorspace in the allocation from the goods being sold in surrounding town and city centres and we fail to see how these controls would be enforced effectively. Items of goods sold in the DOV may not be identical to items sold elsewhere, but they are likely to provide very acceptable lower price substitutes, the substitution effect in economics being the understanding that, as prices rise — or income decreases — consumers will replace more expensive items with less costly alternatives. In addition, potentially free and easily accessible car parking, a quality environment together with A3 restaurant and café uses will make the DOV an attractive place to shop for many consumers.

- We consider that the proposed development will be unsustainable because it will lead to a considerable increase in journey times for the workforce and for potential customers, both likely to be drawn from a wide region. This could also lead to an unwelcome increase in harmful emissions as well as traffic congestion.

Yours sincerely,

Jeremy Salter (Chairman, Tiverton Civic Society)

