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## **Assessment of Retail & Main Town Centre Use Planning Policy: Proposed Mixed Use Development at 'Westwood', near Tiverton**

Mid Devon District Council

November 2014

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## CONTENTS

1.	Introduction .....	1
2.	The Proposed Development and Planning Policy Context .....	3
3.	Planning Policy Context .....	8
4.	Need .....	11
5.	The Sequential Approach to Site Selection .....	21
6.	Impact .....	26
7.	Summary and Conclusions .....	31

# 1. Introduction

## Scope and Purpose

- 1.1 This report has been prepared by GVA in response to an instruction by Mid Devon District Council ('MDDC') to carry out an independent review of the retail, leisure and main town centre planning policy aspects of a proposal, by Friends Life Ltd, to allocate land adjacent to Junction 27 of the M5 Motorway for a mixed use development.
- 1.2 In brief, the proposed allocation includes provision for a variety of main town centre and other land uses including retail, leisure, entertainment, a retirement village, storage/distribution and tourism uses on land to the east of the M5. In totality, the entire proposed allocation covers 90 hectares, with the main town centre uses aspects totalling over 100,000sq m of floorspace.
- 1.3 In accordance with our instructions from MDDC, we have carried out a review of the relevant supporting documentation which has been submitted in support of the proposed allocation. The main document subject to our review has been a Town centre Uses Study (Draft Final) ('TCUS'), dated 7<sup>th</sup> November 2014, prepared by CBRE. Appended to the TCUS are further documents, prepared by Colliers, which relate to the proposed leisure land uses. These include a Leisure Destination Strategy & Concept document ('the Leisure Strategy'), dated June 2014, and a Leisure Impact Assessment (dated July 2014).
- 1.4 The preparation of the TCUS report follows a period of liaison between GVA, MDDC and CBRE over the scope and content of the information required by MDDC on the main town centre land use elements of the proposed allocation.
- 1.5 This report concentrates upon the provision of advice to MDDC in relation to the main town centre land use elements of the proposed development. These elements comprise retail, leisure, entertainment, arts, culture and tourist uses and specific reference is made to Section 2 and paragraphs 160 & 161 of the National Planning Policy Framework ('the NPPF'), which was published in March 2012, and also the contents of the National Planning Practice Guidance ('NPPG') published earlier in 2014.

A summary of the salient parts of these documents is provided in the next section of this report.

- 1.6 From the outset, it should be noted that this advice report only relates to the main town centre use elements of the proposed allocation and there will be other factors that MDCC will need to consider in relation to the wider land use elements of the proposal. Moreover, we have been asked to assess the precise suite of land uses as proposed within the TCUS document and have provided comments accordingly. Clearly, other opportunities, in terms of land use mix and scale of development, may be available for the proposed site and such proposals would require a separate examination as to their planning merits and conformity with the NPPF.

### Contents of Report

- 1.7 The remainder of this report is structured in the following manner:
- Section 2 outlines the scope of the proposed allocation, along with a review of the planning policy context facing the application.
  - In Sections 3-5 we provide a review of the salient main town centre planning policy issues, including the assessment of need, the sequential approach to site selection and impact issues.
  - A summary of the key issues and our conclusions are set out in Section 6 including the relationship of the proposed development to the development plan for the area and other material considerations (including the NPPF).

## 2. The Proposed Development and Planning Policy Context

### The Proposed Allocation

- 2.1 Section 3 of the TCUS, plus Section 1 of the Leisure Strategy document, outline the variety of land uses for which an allocation is being sought.
- 2.2 The key land use elements can be summarised as follows:
- A water-based leisure attraction (which we understand to be a 'surf lake')
  - An 'artisan' village
  - An 'activity leisure' area along with related retail floorspace
  - A designer outlet retail village
  - A plant/horticulture centre
  - A 'visitor centre'
  - Cafes and restaurants
  - A cinema (suggested to be up to six screens)
  - Two hotels
  - A conference/concert venue
  - A retirement village
  - Commercial and logistics floorspace
  - Roadside services area
- 2.3 We provide an extract of the Leisure Strategy document below, which outlines the floorspace within the proposed allocation.

Figure 2.1 – extract from Leisure Strategy document – proposed land uses and floorspace

<b>WESTWOOD - a unique leisure destination in the heart of the South West</b>				
<i>Brand</i>	<i>Product Mix</i>	<i>Use Class</i>	<i>Building GIA sqft</i>	<b>TOTAL GIA sqft</b>
<b>Westwood Reef</b>	- Surf Lagoon & Beach			
<i>Outdoor Leisure Destination</i>	- Water/Sand Play			
	- Cycling & Segway Trails			
	- Aerial High-Ropes Adventure		5,000	
	- Adrenaline Attractions			
	- Bandstand/Event Lawn			
	- Activity Pavilion		10,000	
	- Boardwalk restaurants/cafes	A3	30,000	
	Sub-total			<b>45,000</b>
<b>Westwood Sports Village</b>	- Experience-led, Try & Buy Retail	A1	60,000	
<i>Outdoor Activity Retail</i>	- Activity leisure		30,000	
	Sub-total			<b>90,000</b>
<b>Westwood Artisan Village</b>	- Restaurants/Cafes	A3	20,000	
<i>Independent, local producers of food, drink and crafts (make &amp; sell)</i>	- Food Retail	A1	20,000	
	- Artisan Village (non-food)	A1	25,000	
	- Wine/Cider Centre	A1/A4	5,000	
	- Cookery School	D1	5,000	
	- Craft Brewery	B2	10,000	
	- Food Wholesale	B8	15,000	
	- Food Research	B1 (b)	5,000	
	- Food Process/Prep	B2	20,000	
	Sub-total			<b>125,000</b>
<b>Westwood Square</b>	- West Country Visitor Centre	A2	20,000	
<i>Entertainment Piazza</i>	- Indoor Family Attraction	D2	25,000	
	- Cinema	D2	50,000	
	- Lifestyle Outlet Village	A1	180,000	
	- Restaurants/Cafes	A3	20,000	
	Sub-total			<b>295,000</b>
<b>Westwood Resort</b>	- Hotel 1: Full Service 100-rooms		60,000	
<i>Short break accommodation/venue</i>	- Conference/Concert Venue		400,000	
	Sub-total			<b>460,000</b>
<b>Westwood Garden</b>	- Garden Centre		25,000	
<i>Regional plant/horticultural centre</i>	Sub-total			<b>25,000</b>
<b>Westwood @J27</b>	- Services, fuel etc		21,000	
<i>Traveller services</i>	- Hotel 2 - Branded Budget 100-rooms		60,000	
	Sub-total			<b>81,000</b>
<b>TOTAL GIA SQFT</b>				<b>1,121,000</b>

- 2.4 Apart from one third of the 'sports village' element, the main outdoor leisure area is the 'Westwood Reef' area. This is proposed to contain a surf lake, beach, play park, cycling trails, a 'high rope' adventure area, 'adrenaline attractions' (such as a zip wire), bandstand/event lawn, activity pavilion (10,000sq ft) and 30,000sq ft of cafes and restaurants. Therefore, of the 45,000sq ft of physical floorspace to be provided in the 'Westwood Reef' area, two-thirds will be Class A uses and not Class D leisure uses. This calculation excludes the surf lake and other outdoor elements which do not provide any physical floorspace within buildings.
- 2.5 The 'sports village' element will extend to 90,000sq ft of floorspace, two-thirds of which will be Class A1 retail floorspace and the remaining third being 'activity leisure'. However, the activity leisure element is not defined in terms of the uses/functions that it will contain.
- 2.6 The third element of the proposed allocation is the 'Westwood artisan village'. This will extend to 125,000sq ft of floorspace, 66% of which will be Class A retail floorspace and 44% devoted to Class B (manufacturing) and Class D (cookery school) uses. The Colliers leisure strategy document suggests that the retail area will be for local businesses although, in reality, this is unlikely to be controlled by the planning system and any type of retail business could occupy this floorspace.
- 2.7 The 'Westwood Square' area will contain the retail outlet centre, cinema, further cafes and restaurants, a 20,000sq ft Class A2 visitor centre and a Class D2 indoor family attraction. The outlet centre will extend to 180,000sq ft and will be a multi-retailer facility, with numerous individual retail units, the largest of which will be 10,000sq ft. It is suggested (by paragraph 3.25 of the TCUS) that the facility will specialise in the sale of end-of-range and surplus stock and offer 'high end retailers and brands' not available on the majority of high streets. It is also suggested by the TCUS that the outlet centre will operate in a *"complementary way to surrounding town centres.....with a different retail offer to that available in the town and city centres within the catchment"*.
- 2.8 The proposed visitor centre will be a large area comprising 20,000sq ft of floorspace and is described as providing the following facilities: information desk, exhibition areas, operator concessions (selling goods and services) and a non-food store. The space to be allocated to these individual areas is not explained. In addition, we are surprised that the visitor centre is being promoted as a Class A2 use given that many of the proposed elements fall into Class A1 and Class D use classes.
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- 2.9 It is also acknowledged by Section 3.4.3 of the Colliers leisure strategy document that the precise nature of the family attraction building (25,000sq ft) "is yet to be decided".
- 2.10 In addition to the roadside service area (which includes one of the hotels), the final area is the 'Westwood Resort'. This is proposed to contain 460,000sq ft of floorspace, the majority of which (400,000sq ft) is proposed for a concert/conference venue. However, paragraph 3.40 of the TCUS confirms that *"there are no firm plans to include such a facility, albeit the site area could accommodate a venue of this type"*.
- 2.11 It is also, at this point, worth clarifying the balance between the leisure and other land use elements of the proposed allocation. It is important to do this as the front cover of the TCUS describes the proposed allocation as a "leisure-led mixed use development", with other descriptions in the main body of the TCUS including "a major tourism and leisure-based mixed use development" and an "exceptional leisure development".
- 2.12 Clearly, therefore, the focus of the submitted documentation is on the leisure elements of the scheme, although in terms of physical floorspace devoted to traditional leisure uses – i.e. those within Class D of the Use Classes Order – then Figure 2.1 above confirms that these elements are in the minority in some elements:
- 66% of the floorspace in Westwood Reef is Class A
  - 66% of the floorspace in Westwood Sports Village is Class A
  - 66% of the floorspace in the artisan village is Class A
  - 75% of the floorspace in Westwood Square is Class A retail space
- 2.13 Within other elements, the focus is on other non-leisure uses: hotels (tourism), concert venue (arts/culture), garden centre (retail), roadside services (retail).
- 2.14 It is also important to acknowledge that the outdoor leisure elements do not possess physical floorspace and these have the potential to occupy part of the proposed allocation. Information received from CBRE on the 25<sup>th</sup> November 2014 confirms that 7.54 hectares will accommodate leisure uses and 4.54 hectares will accommodate other main town centres (including retail floorspace). Therefore, in terms of physical site area, the leisure uses are in the majority. However, we consider that it is reasonable to

note that the leisure uses are likely to be of a lower density than the other uses such as Class A retail.

- 2.15 Overall, however, whilst leisure uses are clearly an integral part of the proposed allocation, they are, in our opinion, one of a number of different elements and are certainly not the dominant use. Indeed, we consider that the dominant use is, instead, Class A retail floorspace, particularly shops and café/restaurant provision.

### 3. Planning Policy Context

3.1 The key policy document guiding the preparation of development plans is the NPPF. Paragraphs 150-185 of the NPPF provide national policy on plan-making, including the need for local planning authorities to set out strategic priorities for inter alia the provision of retail, leisure and other commercial development<sup>1</sup>.

3.2 Paragraph 158 of the NPPF notes that:

*“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”.*

3.3 In relation to business uses, paragraphs 160 and 161 note:

*“Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should:*

- work together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market; and*
- work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability*

*Local planning authorities should use this evidence base to assess:*

- the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;*
- the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. Reviews of land available for economic development should be undertaken at the same time*

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<sup>1</sup> Paragraph 156 of the NPPF

*as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land;*

- *the role and function of town centres and the relationship between them, including any trends in the performance of centres;*
- *the capacity of existing centres to accommodate new town centre development;*
- *locations of deprivation which may benefit from planned remedial action; and*
- *the needs of the food production industry and any barriers to investment that planning can resolve”.*

3.4 Section 2 of the NPPF relates to town centres and main town centre uses and asks 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 should:*

- *recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;*
- *define a network and hierarchy of centres that is resilient to anticipated future economic changes;*
- *define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations;*
- *promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;*
- *retain and enhance existing markets and, where appropriate, re- introduce or create new ones, ensuring that markets remain attractive and competitive;*
- *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. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;*
- *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;*

- *set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;*
- *recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and*
- *where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.*

3.5 It is therefore clear that national policy asks local planning authorities to consider inter alia three main issues when planned for retail and other main town centre uses: the need for development, the application of the 'town centre first' sequential approach and an assessment of the impact of new development. These three key issues have been the focus for our discussions with CBRE over the scope of their TCUS and the supporting material provided by Collies to CBRE.

3.6 National planning policy in the NPPF is supported by the National Planning Practice Guidance ('NPPG'), which was published earlier in 2014. The NPPG provides guidance on assessing the need for main town centre uses, applying the sequential approach and impact tests in plan-making. Reference is made to this guidance in sections 4, 5 and 6 of this advice report.

## 4. Need

### Introduction

- 4.1 Section 6 of the TCUS deals with the need for Class A1 retail floorspace elements of the proposed allocation. This section deals with: the artisan village, the activity retail (which is related to the 'activity leisure'), the designer outlet village, and the plant/horticulture centre. For each element, qualitative and quantitative information is provided.
- 4.2 Section 7 of the TCUS deals with the need for the other main town centre uses, these being the cinema, the two hotels, the visitor centre and the café/restaurant uses. Paragraph 7.1 also suggests that the need for the conference/concert venue is also assessed in that section, although this is not the case.

### Class A1 Retail Elements

- 4.3 Section 6 of the TCUS provides information in relation the quantitative and qualitative issues associated with the various Class A1 retail floorspace elements. Separate assessments are provided for the artisan village, activity retail, designer outlet and garden centre elements.

#### *Quantitative assessment*

- 4.4 Whilst the different elements will sell food and non-food goods to varying degrees, CBRE's quantitative assessment shares common assessments for both convenience and comparison goods. Both the separate convenience and comparison goods assessments follow a very similar approach, namely:
- Estimation of the turnover of the convenience and comparison goods floorspace, including the amount of turnover drawn from residents of the study area;
  - Calculation of the population and per capita expenditure levels within the study area;
  - Assessment of shopping patterns for convenience and comparison goods across the study area;

- Calculation of the turnover of convenience and comparison retail commitments across the study area; and
- Calculation of the retail expenditure capacity for convenience and comparison goods floorspace across the study area.

4.5 We discuss each element of CBRE's assessment in turn below.

4.6 In relation to the turnover of the proposed Class A1 floorspace, individual estimates are provided for the convenience and comparison goods floorspace elements. For the convenience goods floorspace, a sales density of £6,000/sq m has been adopted for the artisan village floorspace. This density will much lower than standard grocery operators and the reasons given by the TCUS for this approach are that *"the products will be of high value but not sold in the same volume as a foodstore"*. No further evidence is provided to substantiate this position and there does not appear to us to be any bar on the proposed floorspace operating in the same manner as a 'normal' foodstore. We would therefore expect, as a worst-case scenario, a sales density of £12-14,000/sq m net to be used.

4.7 A similar observation applies to the comparison goods floorspace within the artisan village, where a sales density of £2,000/sq m has been adopted. The sales density is based upon an average of only two retailers and we are not aware of any proposal to restrict this element of floorspace to a particular style of retail operation. Indeed, other sports goods operators are able to achieve higher sales densities.

4.8 For the designer outlet retail village, it suggested that an average sales density of £3,000/sq m is appropriate but a "worst case" scenario of £7,000/sq m is adopted. No information is provided to substantiate either the 'average' density of £3,000/sq m or the 'worst case' scenario of £7,000/sq m. We consider that, whilst the case has not be proven, the £7,000/sq m sales density is the more appropriate of the two densities suggested, not least given the scale of the proposed floorspace and the highly accessible location of the proposed allocation site.

4.9 In relation to the population data adopted by CBRE, this has been sourced from Experian. Confirmation is required that the data from Experian is based on the results of the 2011 Census and that the population growth projections for the various zones in the

study area have been checked against the population growth forecasts within each local authority area in the study area.

- 4.10 Per capita retail expenditure on convenience and comparison goods is also sourced from Experian and has been projected into the future using forecasts provided by Experian in October 2014 (in its Retail Planner Briefing Note). On the basis of the use of forecasts in Table 1a of the October 2014 briefing note, we consider the per capita expenditure data used by CBRE to be acceptable.
- 4.11 In order estimate the study area derived turnover of convenience and comparison goods floorspace, the CBRE assessment uses the results of a household survey specifically commissioned for the TCUS. A summary of the market share levels provided by the survey is provided in tables K4 and L4 (in appendices K and L respectively). Individual market share levels for main and top-up food shopping and the various different types of comparison goods are not provided and therefore it is not possible to understand the weightings that have been applied to reach the summary market share levels. Assuming that reasonable weightings have been applied, the market share levels used by the CBRE assessment have the potential to provide up-to-date shopping patterns. However, there does not appear to have been an attempt to validate or compare the results of the latest survey against other recent surveys contained in local planning authority evidence base studies.
- 4.12 In order to estimate the amount of 'available' comparison goods expenditure to accommodate new comparison goods floorspace in the study area, CBRE's assessment includes an allowance for comparison goods floorspace commitments. Commitments in Bideford, Barnstaple, Exeter, Street, Weston and Bristol are taken into account. A similar approach is undertaken for the convenience goods floorspace assessment. The inclusion of these commitments is appropriate.
- 4.13 Whilst it is appropriate to include extant and unimplemented planning permissions, a key concern is that the submitted assessment ignores other 'claims' on the forecast expenditure capacity. In particular, these 'claims' on expenditure should also include development plan allocations on the basis that local planning authorities have allocated land in their local areas to meet the needs arising. Indeed, in this way, the proposed 'Westwood' allocation is no different to other existing development plan allocations. Therefore, if the promoters of 'Westwood' wish to demonstrate a

quantitative need for an allocation then they must also include other retail land use allocations in the same assessment.

4.14 Without such an assessment, the quantitative analysis for convenience and comparison goods floorspace is incomplete. Therefore, whilst the assessment shows that there is a level of surplus comparison goods retail expenditure capacity with the study area, part or possibly all of this 'capacity' could be taken up by existing or proposed development plan allocations for retail floorspace. We therefore cannot agree with the conclusion of the TCUS that there is a quantitative need for the proposed comparison goods floorspace.

4.15 A similar conclusion is also reached in relation to the convenience goods floorspace assessment. Allocations for new convenience goods floorspace in the study area have not been included. In addition, a further concern over the convenience goods assessment is the lack of the use of company average benchmark sales densities. The CBRE assessment simply assumes that existing convenience goods floorspace within the study area is current trading in line with an appropriate benchmark and does not investigate whether an allowance should be made for under or over-trading.

4.16 Overall, whilst the assessment provided by the TCUS does indicate that there is the potential for surplus convenience and comparison goods expenditure capacity within the study area, the assessment does not include the development plan allocations which MDDC and its neighbouring authorities have identified in order to meet the need for new retail floorspace.

#### *Qualitative assessment*

4.17 Each part of the proposed Class A1 retail floorspace is supported by text (from CBRE) on qualitative issues. We discuss each element in turn below.

4.18 In relation to the **artisan village**, reference is made to existing 'farm shops' in Devon and their propensity to sell products from one single provider. It is therefore suggested that the area lacks a base from which products from a range of producers across Devon can be sold.

4.19 In response, we would note the following:

- The text from CBRE appears to relate to farm shops which are traditionally associated with food products, although we understand that the artisan village will contain both food and non-food products.
- We do not consider that the proposed Westwood allocation is in a unique position in Devon with regards to the sale of products from multiple producers. For example, the Darts Farm complex also provides products from multiple producers.
- However, we do accept that retail facilities, of the type proposed at Westwood and currently existing at Darts Village, are not common in Devon and therefore this element does offer the potential for an improvement in the quality of provision in the local area.
- That said, there is no analysis from CBRE to explain why the artisan village element of the proposed allocation can only be provided at the proposed allocation site and if there is a need from farm/craft producers to provide this new facility in contrast to existing outlets.

4.20 In relation to the **activity retail floorspace** (which is associated with the activity leisure use), the CBRE assessment provides a very limited analysis. It is suggested that the sale of goods for outdoor pursuits will improve the retail offer in this sector, however the CBRE assessment fails to consider how existing retail provision for such goods in the local area is failing to meet existing and future needs.

4.21 In relation to the **designer outlet retail village**, a number of issues are raised by CBRE:

- The proposed facility will complement existing designer outlet facilities in Devon, Somerset, Gloucestershire, Dorset and Wiltshire.
- The designer outlet is needed to sustain "the rest of the destination".
- There is evidence of lengthy journeys to other existing designer outlet centres, although CBRE claim that outlets are not a main comparison shopping destination and are instead a "special shopping destination".

4.22 In relation to the 'complementarity' of the designer outlet centre, it is reasonable to start by noting that such facilities are not common in every local authority area in the

UK and therefore a designer outlet centre will be unique for Mid Devon and the immediate surrounding area.

- 4.23 However, the CBRE assessment indicates that other existing facilities in surrounding counties are up to 1 hour and 45 minutes away from Tiverton. These facilities, in Bideford, Gloucester, Street and Swindon are visited by some of the local population<sup>2</sup>, and the Street and Bideford facilities are within the catchment area of the proposed outlet centre (with the Gloucester and Swindon centres lying on the edge of this area).
- 4.24 Therefore, the proposed allocation will bring a designer outlet retail village closer to the residents of Mid Devon (plus Exeter and Taunton) and this may be given some positive weight within the qualitative assessment. However, it should be remembered that CBRE's own assessment suggests that such facilities are not main comparison shopping destinations and are instead special shopping destinations. Therefore, whilst such facilities may compete with traditional high streets they are not necessarily an acceptable replacement for them.
- 4.25 The second claim is that the designer outlet centre is needed to sustain the rest of the 'destination'. However, no information has been provided to substantiate this position. Therefore, based on the information provided to date, no weight can be placed on the suggestion that the outlet centre is needed to enable the provision of some or all of the other land use elements.
- 4.26 Overall, it is reasonable to conclude that the designer outlet retail centre will provide a particular style of facility which is not currently available in Mid Devon. This is likely to provide a positive qualitative factor in support of the proposal. However, the weight to be attached to this issue is tempered by the comparable retail offer of competing destinations such as Exeter and Taunton.
- 4.27 The final Class A1 retail element is the 'plan/horticulture centre'. Section 6 outlines other similar facilities across Somerset, Devon and Dorset and notes that the proposed facility at Westwood will complement these existing locations. However, the assessment provided by CBRE does not list all garden centres in the local area, of which

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<sup>2</sup> 38% - paragraph 6.21

there are many more, and there is no suggestion by CBRE that the local area is in any way qualitatively deficient in terms of garden centres. Therefore, we do not consider that a qualitative case is proven for a garden centre use at the proposed allocation site.

## Cinema

4.28 In relation to the proposed cinema, the TCUS relies upon the Leisure Impact Assessment prepared by Colliers. The Colliers report concentrates upon the number of cinema screens within the local area, noting that there are two screens – in Wellington and Tiverton – within a 15 minute drive time of the proposed allocation site and 28 screens within a 30 minute drive time.

4.29 There are a number of matters to note in relation to the analysis provided by Colliers, and relied upon by CBRE

- The analysis is largely quantitative in nature, although it is suggested that the proposed new cinema at 'Westwood' will provide a different type of offer to the Tivoli cinema in Tiverton.
- Colliers note that the local area – i.e. within 15 minutes drive of the proposed allocation site – should be able to accommodate 4 cinema screens if provision was in line with the national average. At present, there are two screens within this area.
- Within the wider area, Colliers indicate that provision is "the same in the 30 minute radius as the national average would imply". Colliers go on to note that there is scope for additional cinema screen provision because the national average "is less than normal demand in an area". However, Colliers do not go on to clarify this statement or make reference to any local evidence base data.
- Whilst Colliers do make reference to a proposed expansion of the Tivoli cinema in Tiverton, it is not included within their cinema screen capacity assessment. If it had been, then there is unlikely to be a quantitative shortfall based upon Colliers own figures.

4.30 Overall, the information provided by Colliers, and relied upon by CBRE, does not make a convincing quantitative case for additional cinema screen provision in the local area. In particular, there is a lack of an analysis of local cinemagoing patterns and a failure to

include the proposed expansion of the Tivoli cinema. In addition, we consider that use of a drive time analysis from the proposed allocation site, rather than a main settlement such as Tiverton, is not the most appropriate approach. Instead, the catchment should be based upon local residents and the main centres of population.

- 4.31 In relation to qualitative matters, we do consider that a case can be made for additional cinema screens in Mid Devon, in order to stop the potential leakage of cinemagoing trips to other centres such as Taunton and Exeter. This goes some way to support the identification of additional provision in the local area, although it does not support the proposed allocation site when other more sequentially preferable opportunities in and adjacent to town centres may exist.

### Hotels

- 4.32 The case put forward by CBRE in relation to the need for hotel accommodation on the proposed allocation site is based on the following:

- The proposed hotel accommodation will contribute towards making Westwood a resort;
- The hotels will be used in order to make visits to Westwood part of a short holiday; and
- Other users of the hotels will include: those people wishing to break their journey from other parts of the UK to Devon and Cornwall and foreign tourists on self-drive holidays.

- 4.33 There is, however, no assessment of the quantitative and/or qualitative need for additional hotel accommodation in the local (Mid Devon) area. Therefore, whilst the provision of additional hotel accommodation has the potential to increase local provision in Mid Devon, which has the potential to be a positive factor in support of such a land use, there is no analysis to demonstrate that such facilities are actually needed (due to a quantitative and/or qualitative deficiency) and/or that the hotels at Westwood are somehow qualitatively different to existing provision.

### Visitor Centre

- 4.34 CBRE state, at paragraph 7.9 of the TCUS, that the visitor centre will provide a visitor information service and a showcase for west country leisure experiences. The Colliers

leisure strategy document explains that it will provide information services, an exhibition area along with a retail/service area for visitors. No specific need or impact assessment is provided for this element, although we do appreciate that an assessment for such a use can be difficult.

- 4.35 Therefore, the aspiration to provide a facility which promotes the west country, including tourist and visitor attractions in Devon and Cornwall, will no doubt be welcomed. Indeed, we can understand why a facility close to the M5 motorway, along with the main road link to North Devon, is likely to be popular. However, such support needs to be tempered in our opinion by the observation that no assessment has been made as to whether facilities elsewhere in the local area already provide this service, either individually or collectively.

### Food and Drink Facilities

- 4.36 The final element which requires a demonstration of need is the proposed food and drink floorspace (i.e., restaurants and cafes). Paragraph 7.10 of the TCUS indicates that these facilities will be used on a regular basis by the local population along with tourists and visitors to the area.
- 4.37 Reference is made to the Colliers reports, which analyse the provision of branded restaurants and cafes in the 15 and 30 minute drive time areas, along with a comparison between local expenditure on food and drink (at cafes and restaurants) and the turnover of existing stores.
- 4.38 The case put forward by Colliers is that there is available local spending to support new restaurants and cafes and that, due to the lack of branded restaurants in the local area, there is an opportunity for Westwood to fill this gap. It is also suggested that Westwood will also provide opportunities for local independent restaurants and cafes.
- 4.39 Having considered the analysis provided by Colliers, we are of the view that the Westwood development is likely to attract some new branded café and restaurant operators that would not otherwise locate within Mid Devon. In addition, the Westwood facility has the potential to stem the leakage of some trips to food and drink establishments outside of the local area, although no survey evidence is provided in the TCUS document.

- 4.40 However, whilst there is the opportunity to improve the café and restaurant offer in the local area, the scale of floorspace which is being promoted for these uses is significant and the TCUS does not provide an assessment of why so much floorspace is required. Whilst there is logic to some food and drink provision being associated with the leisure uses, the scale of provision currently being promoted is not justified and is likely to rival the scale of provision in surrounding town centres.

## 5. The Sequential Approach to Site Selection

### National Planning Policy

- 5.1 In relation to the sequential approach to site selection, paragraph 23 of the NPPF asks local planning authorities to:

*“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. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites”.*

and

*“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”.*

- 5.2 The NPPG notes 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”.*

- 5.3 The NPPG also provides the following checklist when taking a sequential approach to plan-making:

- *“Has the need for main town centre uses been assessed? The assessment should consider the current situation, recent up-take of land for main town centre uses, the supply of and demand for land for main town centre uses, forecast of future need and the type of land needed for main town centre uses.*
- *Can the identified need for main town centre uses land be accommodated on town centre sites? When identifying sites, the suitability, availability and viability of the site should be considered, with particular regard to the nature of the need that is to be addressed.*
- *If the additional main town centre uses required cannot be accommodated in town centre sites, what are the next sequentially preferable sites that it can be accommodated on?”*

## Assessment

- 5.4 It is clear from paragraph 23 of the NPPF and salient parts of the NPPF that the sequential approach should be applied having regard to the need that has been identified. Based upon the contents of the NPPF and NPPG, this raises two issues in our opinion. First, sites should only be allocated for particular land uses where there is an identified need. Second, the location of any allocation will be influenced the type and scale of the identified need.
- 5.5 As we have concluded in Section 3 of this advice report, the submitted assessment does not prove that there is a need for a number of the main town centre use elements of the proposed allocation, either in their own right and/or over and above the needs which each local planning authority is planning for their development plans. As a consequence, and based upon the form of development currently proposed, we consider that there is no requirement to move on to the next stage of the assessment and consider the suitability, availability and viability of alternative sites as there is no identified need.
- 5.6 However, on a without prejudice basis, we have considered the sequential assessment contained within the TCUS, particularly in relation to the approach which has been adopted.
- 5.7 Section 8 of the TCUS deals with the sequential approach and quotes both plan-making and development management policy in the NPPF. It also quotes the recent Dundee court judgement, in terms of what is meant by the issue of 'suitability', and highlights the loss of the development management requirement to consider disaggregation in relation to a specific planning application proposal.
- 5.8 Whilst the issue of 'flexibility' in scale and form is a useful general consideration when applying the sequential approach, the decision of CBRE to quote from development management policy/guidance, along with a court judgement relating to an individual planning application, has the potential to divert the assessment away from what is intended by the NPPF.
- 5.9 As we have noted, the identification, assessment and allocation of sites relates to identified needs and not necessarily the precise form of a proposed allocation. Therefore, the TCUS assesses what the promoter of the allocation wishes to provide

rather than on the particular characteristics of need in the local area. We consider this to be an incorrect approach.

- 5.10 In relation to the issue of disaggregation and the relationship of the various constituent parts of the proposed allocation, we consider that reliance on a change in national development management policy between PPS4 and NPPF is an incorrect starting point. The NPPF and NPPG are clear that the allocation of individual sites is based on the identified need. In other words, if a need to combine some or all of the constituent parts of the development together can be demonstrated then that will be an important material consideration for assessing the availability, suitability and viability of alternative locations.
- 5.11 In this instance, we have already concluded that the TCUS has not provided a convincing case for the co-location of the proposed main town centre land uses together, with or without the other land use elements such as the outdoor leisure uses. In particular, there are examples of where individual uses, such as the designer outlet village, cinema, food and drink units, hotels and the surf lake, are either currently available (or are being promoted) without the need for most or all elements to be provided together.
- 5.12 Therefore, if the need for co-location cannot be proven, then sites within the catchment area of each use should be considered in terms of their suitability to accommodate that particular use.
- 5.13 Such an assessment has not been undertaken by the TCUS and the suggestion, at paragraph 8.19 of the TCUS, that the constituent parts are "essential elements" has not been proven. Instead, the approach adopted to the sequential assessment in the TCUS is to rely on the allocation providing "an exemplary leisure destination". This may be so, in terms of Westwood providing a mixture of uses that no other leisure destination in the UK has so far provided, although this is not a reliable indication of need or a reliable justification for the need to co-locate all of the proposed land uses.
- 5.14 Paragraph 8.26 of the TCUS also suggests that:

*"there is a need to have the scheme delivered in the nature and form suggest in the master plan in order to achieve for Friends Life: a viable scheme, a scheme which allows the cross-subsidiary of less economic leisure uses....."*

- 5.15 The same claim is made at other parts of the TCUS and also the supporting documentation provided by Colliers. However, at no point does the TCUS or the Colliers information explain this in any further detail and/or provide a viability assessment to demonstrate that the alleged "less economic" leisure uses cannot be provided (and operate) in their own right. There, we consider that no weight can be placed on the claim that the individual parts of the scheme are not viable, nor the inference that all of the proposed land uses are required to make the proposed allocation viable.
- 5.16 The TCUS then goes on to assess a large number of alternative sites in Tiverton, Exeter, Crediton, Exmouth and Taunton. These sites are assessed on the basis of their suitability to accommodate the whole of the proposed allocation. However, given that we have already concluded that there has not been a robust justification for why all of the land use elements must be provided together, the assessment provided by the TCUS may not be the most appropriate way in which to approach the sequential site assessment.
- 5.17 For example, given that there is an acknowledged qualitative need for an improved level of comparison goods floorspace in Mid Devon and given that we have acknowledged that some of the proposed retail uses should improve the quality of provision in the Mid Devon area, no assessment has been made as to whether these uses can be accommodated on proposed allocation sites such as Phoenix Lane in Tiverton.
- 5.18 In addition, given that the expenditure capacity which the TCUS uses to justify a quantitative need for the proposed retail floorspace comes from a wide area, including Exeter and Taunton, there is no analysis as to whether sites in and around Exeter city centre and Taunton town centre can accommodate the alleged need for the proposed retail floorspace.
- 5.19 Moreover, we are unconvinced by the arguments put forward in the TCUS regarding the area of search for alternative, more sequentially preferable, sites. Paragraph 8.31 of the TCUS notes that

*"the development is largely, albeit not exclusively, intended to serve residents of and tourists visiting the West Country".*

- 5.20 Based upon that stated role and function, the TCUS offers two constraints regarding the location of the proposed facility and the area of search. First, it is suggested that

relocating the development to the east/north-east would be unable to realistically serve a large proportion of residents of, and visitors to, Cornwall. Second, it is suggested that movement of the development to the south-west would not serve residents of the Salisbury and Bournemouth areas.

5.21 These constraints operate largely in the context of the proposed land uses being placed together in one location. In this way, it is easy to see why relocating the whole of the development to west Devon or Cornwall would make the development less accessible to residents of parts of Somerset, the West of England, Wiltshire and Dorset. Similarly, a relocation to, say, the West of England would become less accessible to residents of (and some visitors to) Devon and Cornwall.

5.22 However, a convincing case has not been made for the co-location of all of the land use elements in the current proposal and therefore we see no reason to exclude the possibility that, if a need could be demonstrated, part of the proposed floorspace could be located in areas where the separate needs of Cornwall, Devon, Somerset, Wiltshire and Dorset could be met. Indeed, part of the proposed allocation is intended to sell "goods and services that made in the West Country"<sup>3</sup>. This is already occurring in locations such as Kingsley Village in Fraddon, the proposed Taste of Cornwall unit in Truro and Darts Farm near Exeter.

## Conclusions

5.23 Overall, based upon the lack of a convincing demonstration of the need for the several constituent main town centre elements of the proposed allocation, we do not consider that the current proposed allocation accords with the sequential approach to site selection. There is not a convincing case to allocate the subject site for the proposed suite of main town centre uses, particularly when opportunities exist to accommodate parts of the development on more sequentially preferable sites in or on the edge of town centres in the catchment area.

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<sup>3</sup> Paragraph 2.36 of the TCUS

## 6. Impact

- 6.1 The NPPF does not provide guidance as to how the impact of proposed development plan allocations should be dealt with. However, the NPPG indicates that:

*"If the Local Plan is based on meeting the assessed need for town centre uses in accordance with the sequential approach, issues of adverse impact should not arise. The impact test may be useful in determining whether proposals in certain locations would impact on existing, committed and planned public and private investment, or on the role of centres".*

- 6.2 In this instance, we have recommended that the supporting information supplied to the Council in support of the proposed allocation deals with the impact of the proposed main town centre uses. We consider that this is the correct approach, given the location of the proposed allocation and the scale of the main town centre uses being proposed. This approach has been accepted by CBRE and sections 9-11 of the TCUS document provide information on town centre health issues, an assessment of financial trade diversion to the proposed Class A1 retail elements and an assessment of the proposed allocation on town centre health.
- 6.3 The starting point for the assessment in the TCUS is a review of the health of the main town centres within the catchment area of the proposed allocation. Various town and city centres have been assessed including Tiverton, Exeter, Barnstaple, Taunton, Plymouth and Torquay and factors such as land use composition, rental levels on retail property, vacancies, pedestrian flows, accessibility and customer views and behaviour. It is clear from the appendices supporting the TCUS document that the town and city centres were visited by CBRE over a two-day period in October 2014. This can only provide a very brief snapshot of the health and attractiveness of any centre and we expect further evidence to be gathered in order to provide a wider view of the health and attractiveness of each centre.
- 6.4 Whilst land use information has been gathered by CBRE for each centre, and updated during their visits, there is very little reference to the various retail study evidence base documents for each of the nearby local authority areas. Such studies can provide useful information on the health of town and city centres over time and can help to build up a picture of their role and function in the wider sub-regional retail hierarchy.

- 6.5 There is also very little analysis on the trading overlap between existing centres and the proposed development allocation, including the contribution of key retail sectors, such as clothes and fashion goods, to the turnover of centres and the geographic extent of their catchments.
- 6.6 Overall, we consider that there is insufficient information provided within the TCUS document in order to properly understand how the health of key town centres will be affected by the proposed allocation. This is particularly important given the clear guidance within the NPPG which asks for an assessment of the impact of proposals on the role of centres.
- 6.7 Turning now to the financial impact of the proposed Class A1 retail floorspace on surrounding town centres in the retail hierarchy, the assessment provided by the TCUS focuses upon a future design year of 2024. We consider that 2024 is a useful assessment year, given the scale of the proposed development, although have also asked CBRE to provide a financial impact assessment at 2019. This (2019 assessment) has been provided, although CBRE suggest that this is an academic exercise as the design retail outlet and other Class A1 retail floorspace may not be open by that date and, even if it was, the floorspace would not have reached a settled trading pattern by that year. No other information has been provided to substantiate this position and therefore MDDC officers will need to consider whether this is a reasonable position to adopt. However, in the interim, we consider that the 2019 date for the impact assessment should be included, alongside the longer-term 2024 assessment date.
- 6.8 In line with our concerns over the assessment of quantitative need, we have a concern that the assessment of cumulative impact in the TCUS is incomplete. Whilst CBRE have included the impact of commitments (i.e. schemes with planning permission) within their cumulative assessment, no allowance has been made for the impact of development plan allocations. Given that the proposed Westwood allocation is no different to other allocations, we consider that the impact of existing and proposed allocations should also be included in order to make a comprehensive and robust assessment. For this reason, the TCUS impact assessment is not accepted and should be updated to deal with these wider retail impacts.
- 6.9 In relation to the other main town centre uses, the TCUS relies on the work undertaken by Colliers. It is confirmed that the cinema will be used on a regular basis by local people, although the conclusion ultimately reached by CBRE is that Westwood will not have an

impact on the number of visits to town centres in which a cinema is located. We are unsure as to how such a conclusion can be reached without an assessment of local cinemagoing patterns, both in Mid Devon and beyond, and also the scale of cinema visits which the new facility will attract and from where these visits will be diverted.

6.10 It is also claimed that the Tivoli cinema in Tiverton, including its proposed expansion, is fulfilling a different role and function to the proposed facility at Westwood. We cannot understand how such a conclusion can be reached when the new facility will be showing the same films as the Tivoli and that core part of its catchment will be local people (who are also likely to be using the Tivoli cinema at present).

6.11 In relation to the impact of the two proposed hotels, the CBRE assessment is limited to the suggestion that users of these facilities will be connected with the other parts of the proposed allocation and therefore it will be a "new market" and not divert usage from other existing facilities. In response, we disagree and would suggest that the hotels will also attract existing visitors and tourists to Devon and the wider South West of England who would otherwise stay at other existing facilities. In any event, there is no detailed assessment, from either CBRE or Colliers of the impact of the proposed hotels.

6.12 In relation to the impact of the proposed food and drink (i.e. café/restaurant), the TCUS document notes that:

- The food and beverage offer will be used on a regular basis by local people;
- The food and beverage facilities will be used in combination with visits to other elements of the Westwood development;
- The Westwood development will be the only option for branded café and restaurant uses in the Mid Devon area;
- The development will provide strong competition for local restaurants and pubs, although most of the business generated by the Westwood development will be latent demand and/or displaced from other locations; and
- The other main development of this kind of offer is likely to be the bus and coach station site in Exeter city centre, although the Westwood scheme is unlikely to have more than a marginal impact upon the viability of that scheme.

- 6.13 In response to the analysis provided by CBRE and Colliers, we would highlight that there is the opportunity for a qualitative improve in the food and drink offer in the Mid Devon area and it may be the case that the Westwood development could attract operators that would not otherwise locate in Tiverton, Cullompton and Crediton's town centres. There is also the possibility that new facilities will curtail the leakage of trips to other centres further afield, such as Exeter and Taunton. However, the evidence to demonstrate the weight to be given to this positive factor is not provided by either CBRE or Colliers. Information on the patterns of usage of food and drink facilities is not provided, nor is there any evidence to demonstrate that Westwood is the only opportunity to accommodate the type of food and drink floorspace proposed.
- 6.14 Moreover, it is confirmed by the CBRE and Colliers assessments that the Westwood facility will provide strong competition for local existing facilities and the scale of the proposed provision, when combined with the scale and attractiveness of the adjacent retail and leisure uses, will mean that Westwood will become a rival destination for café and restaurant visits to Mid Devon's centres and also other centres, including Taunton and Exeter.
- 6.15 Indeed, our key concern surrounding the issue of 'impact' is the scale of the proposed retail, food and drink and cinema floorspace. On both an individual basis, and also on a combined basis, our concern regarding the content of the proposed allocation is that it will provide a rival quasi-town centre destination to existing centres within the retail hierarchy. The content of the proposed allocation will provide a range and scale of facilities which is traditionally found in town centres and there is no reason to suggest that it will be seen as a different or complementary offer to centres such as Tiverton, Exeter and Taunton, plus other centres further afield such as Newton Abbot, Plymouth and Barnstaple.
- 6.16 Therefore, whilst the TCUS analysis concentrates upon the financial impact of the Class A1 element of the proposed allocation, the actual impact of the proposed allocation lies in its scale and suite of land uses. The TCUS analysis seeks to assess the acceptability of the proposed allocation on the basis of whether the impact is 'significant'. However, this is not the test in either the NPPF or NPPG, with the NPPG noting that *"the impact test may be useful in determining whether proposals in certain locations would impact on existing, committed and planned public and private investment, or on the role of centres"*. It is our view that the scale and function of the proposed allocation will

impact on the role of nearby centres in the local hierarchy, including Tiverton, Exeter, Barnstaple and Taunton by offering a rival shopping and leisure destination.

## 7. Summary and Conclusions

### Scope and Purpose

- 7.1 This report has been prepared by GVA in response to an instruction by Mid Devon District Council ('MDDC') to carry out an independent review of the retail, leisure and main town centre planning policy aspects of a proposal, by Friends Life Ltd, to allocate land adjacent to Junction 27 of the M5 Motorway for a mixed use development.
- 7.2 The proposed allocation includes provision for a variety of main town centre and other land uses including retail, leisure, entertainment, a retirement village, storage/distribution and tourism uses on land to the east of the M5. In totality, the entire proposed allocation covers 90 hectares, with the main town centre uses aspects totalling over 100,000sq m of floorspace.
- 7.3 This report concentrates upon the provision of advice to MDDC in relation to the main town centre land use elements of the proposed development. These elements comprise retail, leisure, entertainment, arts, culture and tourist uses and specific reference is made to Section 2 and paragraphs 160 & 161 of the National Planning Policy Framework ('the NPPF'), which was published in March 2012, and also the contents of the National Planning Practice Guidance ('NPPG') published earlier in 2014. A summary of the salient parts of these documents is provided in the next section of this report.
- 7.4 It should be noted that this advice report only relates to the main town centre use elements of the proposed allocation and there will be other factors that MDDC will need to consider in relation to the wider land use elements of the proposal. Moreover, we have been asked to assess the precise suite of land uses as proposed within the TCUS document and have provided comments accordingly. Clearly, other opportunities, in terms of land use mix and scale of development, may be available for the proposed site and such proposals would require a separate examination as to their planning merits and conformity with the NPPF.

## Need

- 7.5 In order to proceed to the allocation of land for the current proposed development, a need for its constituent parts must be demonstrated. An assessment of quantitative and qualitative need for the retail elements of the current proposal has been provided, along with a more general assessment of the need for the other main town centre use elements. Having reviewed these assessments, we have reached the conclusion that a need for the proposed quantum of Class A1 retail floorspace has not been demonstrated. The submitted assessment lacks reference to other land use allocations for retail floorspace within the catchment area, which is a significant omission from the quantitative assessment. From a qualitative perspective, we do consider that a need for a significant amount of Class A1 retail floorspace in this location has been demonstrated.
- 7.6 In relation to the other main town centre land use elements, such as the food and drink provision and cinema, we do recognise that, in principle, there are opportunities for a qualitative improvement in some of these facilities in Mid Devon. However, the scale of provision within the current proposal has not been demonstrated, nor has it demonstrated why this scale of provision can only be placed at Junction 27 and not on more sequentially preferable sites.

## Sequential Approach to Site Selection

- 7.7 The case put forward by the promoter of this current form of allocation is that, in order to satisfy the sequential test, alternative sites must be able to accommodate the form of development within the allocation. However, support for this approach is sought from development management policies (and case law) and, instead the NPPF asks sites to be allocated in development plans based upon an assessment of need.
- 7.8 Overall, based upon the lack of a convincing demonstration of the need for the several constituent main town centre elements of the proposed allocation, we do not consider that the current proposed allocation accords with the sequential approach to site selection. There is not a convincing case to allocate the subject site for the proposed suite of main town centre uses, particularly when opportunities exist to accommodate parts of the development on more sequentially preferable sites in or on the edge of town centres in the catchment area.

## Impact

- 7.9 Having reviewed the impact assessment provided in support of the proposed allocation, we have reached the view that it is incomplete in relation to the Class A1 retail land use elements and has failed to adequately assess the wider impacts of the proposal on town centre health issues. In particular, the assessment of current town centre health issues is limited and does not provide sufficient information to enable a proper assessment of the role and function of existing centres in the retail hierarchy.
- 7.10 There is also an inadequate level of detail in relation to some of the other main town centre land use elements, including the proposed cinema and hotel provision.
- 7.11 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.