Our Ref:
Your Ref:

13th September 2018

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Dear Matt

Middlemoor – Proposed Retail & Leisure Development
(ECC reference: 18/1007)

Introduction

Further to your instructions, I write, as requested, to provide written advice on the key retail planning policy issues associated with the above planning application.

The submitted application comprises the following description of development:

> *"Demolition of existing buildings and erection of a mixed use development comprising Class A1 retail units; Class A1/A3/A5 food and drink units with drive through facilities; Class D2 health & fitness use; management office, customer toilet facilities, and associated access, parking, and landscaping".*

A more detailed review of the scale and nature of the proposed floorspace is contained in the next section of this advice letter.

The applicants are Hammerson (Exeter II) Limited and the Devon & Cornwall Police Crime Commissioner.

Our review of the relationship of the proposed development with salient retail and town centre planning policies in the development and material considerations (such as the new National Planning Policy Framework ('NPPF') published in July 2018) has focused upon the sequential and impact tests. This is due to the application site lying in an out of centre location in planning policy terms.

When making our assessment, we have undertaken a review of the contents of the applicants' Retail & Leisure Assessment ('RLA') which has been prepared by Burnett Planning and dated June 2018. In addition to the RLA, the applicants have submitted some suggested controls over the proposed retail floorspace. These controls have been revised during the course of discussions between Burnett Planning, ECC officers and GVA and are outlined in the next section of this advice.

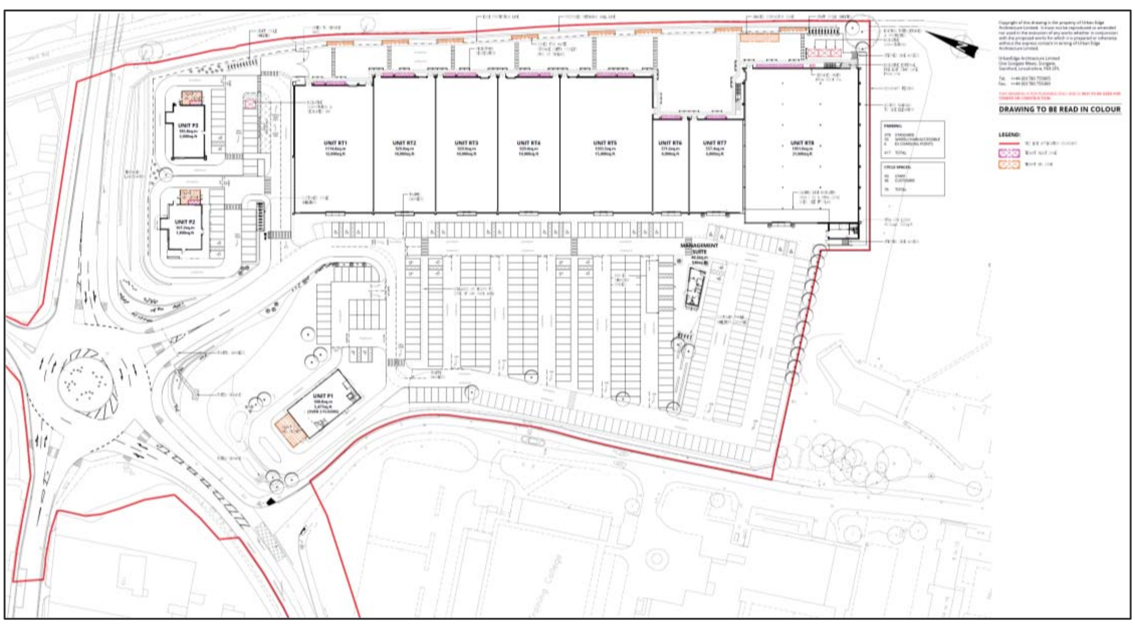
As you know, this application is one of a number of recent/current applications for retail development on the eastern side of the Exeter urban area. These are:

- Moor Exchange. ECC has recently resolved to refuse planning permission for a 12,634sq m retail development on land to the north of Honiton Road. The application was withdrawn by the applicant prior to ECC issuing its formal decision notice. This was the third application at the Moor Exchange site in recent years, following a refusal of planning permission by the Secretary of State for a similar scheme in 2016. We understand that another application at the Moor Exchange site has recently been submitted to ECC, although at the time of finalising this advice letter the application has yet to be registered.
- Western Power Distribution. An outline application for the redevelopment of the WPD depot to provide 7,962sq m of Class A retail floorspace.
- Tesco car park. An outline application for a 1,230sq m Class A1 retail unit on the car park of the existing Tesco supermarket at Russell Way.
- B&Q. Outline planning application for the redevelopment of the existing B&Q Warehouse at Avocet Road.

To date, we have provided written advice to ECC on the retail planning policy issues associated with the recent Moor Exchange application. An element of that advice contains relevant background and contextual information for this application at Middlemoor and therefore, in the interests of brevity, we will refer to the content of our May 2018 advice where necessary. Whilst the Middlemoor application needs to be determined on its own merits, it is nevertheless useful to refer back to the Moor Exchange proposals (and the Secretary of State's decision in 2016) as it can provide useful information.

The Proposed Development

This is a full planning application and an extract from the submitted site layout plan is shown in Figure 1 below:



Eight medium to large retail units are proposed (R1-R8) along with three smaller units (P1-P3). As originally proposed these three units were to have dual A1 and A3 use, although the draft controls offered by the applicants now propose these to be Class A3 use only.

In total, 14,103sq m of gross floorspace is proposed. Within this amount, the following can be provided:

- A maximum non-food floorspace of 11,473sq m
- A foodstore unit of 1,951sq m
- 1,905sq m of Class D2 health and fitness floorspace
- 862sq m for the originally proposed A1/A3 floorspace, now changed to A3 only.

The RLA indicates that the eight larger units in the scheme *"will be occupied mainly by national multiple bulky goods retailers in the furniture, furnishings and homewares sectors"* and *"other bulky goods retailer interest may come from the hobbies, sports, and toys sectors"*.

Section 1 of the RLA refers to the previous planning permission on this site for a large supermarket and notes that it *"includes 1,166sq m unrestricted non food sales floorspace as part of that approved store. In the proposed scheme it is proposed to retain an element of the flexibility that this 1,166sq m sales floorspace would provide but not to allow it to be used for the sale of all non food goods".* Such an allowance was proposed in the applicants' initial set of draft controls but has subsequently been removed.

The current version of the draft proposed controls are as follows:

- A restriction on food retail sales, apart from:
    - Up to 15% of the sales area of one unit;
    - The use of one unit as a foodstore up to 1,951sq m gross; and
    - The sale of confectionery where sold as ancillary goods.
- The following categories of non-food goods can be sold:
    - DIY and gardening goods
    - Kitchens and bathrooms
    - Carpets and floor coverings
    - Lighting products
    - Household furniture, furnishings and textiles
    - Office furniture and supplies
    - Household goods and kitchenware
    - Electrical goods
    - Motor vehicle related goods
    - Marine accessories and chandlery
    - Camping and associated leisure goods
    - Pets and pet related goods
    - Hobbies, craft and toys (from one unit only)
    - Sports and outdoor leisure pursuits clothing, footwear and equipment (from one unit only)
    - Toiletries (but only where sold as ancillary goods and not exceeding a maximum of 50sq m in total)
- No sub-division of units R1-R8.
- The use of units P1/2/3 shall be Class A3 use only.
- Net sales area for R1-R8 of 9,594sq m.

Planning Policy Context

The development plan for Exeter comprises the Exeter Core Strategy and those remaining saved policies in the Exeter First Review Local Plan which have not been superseded by the contents of the Core Strategy. In addition to the development plan, the contents of the new NPPF and supporting National Planning Practice Guidance ('NPPG') will be material considerations.

The site subject to this application lies outside of any defined 'town centre' in the retail hierarchy in Exeter and the distance to the nearest defined centre indicates that the site should be classified as an out of centre location. As a consequence, Policy CP8 of the Core Strategy is relevant to this application. As set out in paragraph 3.4 of our May 2018 advice report, CP8 allocates a significant amount of new food and non-food retail floorspace to the city centre and indicates that proposals in out of centre locations will be considered against the sequential and impact tests. CP8 also refers to the requirement for 'local retail facilities' in the Monkerton/Hill Barton and Newcourt urban extensions.

National planning policy on retail and town centres in the July 2018 version of the NPPF is contained within Section 7 of the new document and its development management policies closely follow the previous version. Paragraphs 86 and 87 deal with the sequential test and continue to advocates a 'town centres first' approach:

> *"Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered".*

and

> *"When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored".*

Paragraph 89 of the new NPPF also requires proposals for retail and leisure development outside of town centres which are not in accordance with an up-to-date Local Plan to undertake an 'impact' test if the proposed development is over a proportionate, locally set threshold or a default threshold of 2,500sq m gross.

Where impact assessments are required, paragraph 89 requires two criteria to be addressed: impacts on existing, planned and committed public and private investment; and impacts on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area.

The new NPPF also retains the same approach to the determination of retail proposals outside of defined 'town centres' noting that:

> *"Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 89, it should be refused".*

The Sequential Test

Given the location of the application site, there is a need to consider whether there are any suitable and available alternative sites in sequentially preferable locations which can accommodate the proposed development. When making this assessment, local authorities and applicants must demonstrate flexibility in terms of scale and format.

The salient issues associated with large scale retail development proposals outside of existing 'town centres' in Exeter have been well rehearsed in relation to the Moor Exchange proposals on land to the north of Honiton Road. In particular, the focus for the sequential site assessment is on the Bus and Coach Station ('BCS') site in Exeter city centre and the Secretary of State's (recovered) appeal decision in 2016 found that the previous Moor Exchange retail and leisure proposal could be accommodated on the BCS site.

Within our May 2018 advice on the more recent Moor Exchange retail development proposal, we concluded that:

"We consider that the focus for the sequential test remains on the BCS site and our re-assessment of its suitability and availability finds a number of factors have not materially changed since the 2015 public inquiry and the June 2016 Secretary of State decision.

These include the development plan strategy towards the site and the physical condition of the site. However, there have been some material changes including the abandonment of the redevelopment scheme promoted by the Crown Estate which is related to changes in market conditions. In addition, as a consequence of the abandonment of the redevelopment scheme (based upon the outline planning permission) ECC will now assess its options with regards to the BCS site going forward and there is a possibility for a change in approach for the land use mix. As a consequence, we consider that it reasonable to remain of the view that the majority of the BCS site considered as part of the previous proposal remains available but there is now much less certainty over it being a suitable alternative for the Moor Exchange proposals.

Also relevant to the issue of suitability is the content of the current scheme. In overall terms, the current scheme is smaller than the scheme refused in 2016, with a similar amount of Class A1 retail floorspace. That change does not suggest that the current scheme cannot be physically accommodated on the BCS site. However, the applicant has contemplated that the current scheme could include a reasonably large foodstore, which is shown on the indicative illustrative masterplan. However, the provision of this floorspace is not guaranteed by the proposed floorspace control offered by the applicant. This suggests no real difference from the previous scheme. However, should a large format foodstore become a formal and guaranteed part of the current scheme, we consider that it could not be accommodated on the BCS site thus potentially removing any potential concern that the BCS site was still a suitable alternative".

We understand that the BCS site was a topic of discussion when the most recent Moor Exchange application was presented to planning committee in August 2018 and the draft minutes note that:

"Some Members also felt that the proposal would still fail the sequential test with reference made to the Bus and Coach Station still being available and sequentially preferable".

It is, however, unclear as to whether this would have formed a formal reason for refusing planning permission as the application was withdrawn by the applicant prior to a decision notice being issued.

This sets a useful background context for the BCS site, although it is important that the BCS site is re-considered in relation to the content of the Middlemoor planning application.

Paragraphs 4.23-4.46 of the applicants' RLA provide an assessment of the BCS site in relation to the Middlemoor proposal. The first part of the assessment deals with the history of the BCS outline planning application proposals, the subsequent abandonment of the scheme by the Crown Estate and the RLA suggests that

"given that the Crown Estate was unable to deliver the approved PHL scheme due to market conditions, there seems no realistic prospect that an alternative commercial development project involving a significant quantum of retail development will be promoted on this site in the foreseeable future".

Our own analysis in our May 2018 advice on the Moor Exchange application does raise some doubts over whether the BCS site will still be promoted for large scale retail development although, whilst the City Council continues to consider its options for the BCS site going forwards, we do not share the negative views expressed in the Middlemoor RLA.

However, as set out in the latter part of the RLA assessment there is a need to consider whether the Moor Exchange and Middlemoor proposals can be distinguished for the purposes of the sequential test. In our view, there are two notable differences between the schemes. First, Moor Exchange was an outline planning application proposal containing a reasonably large amount of flexibility in terms of how the scheme could ultimately be developed. In contrast, the Middlemoor proposal is a full planning application, containing all necessary details for the development. In particular, there is clarity over the number and size of the retail units.

Second, there are differences between the schemes in terms of the range of goods which could be sold. The Moor Exchange proposals would be able to sell a much wider range of comparison goods and a much higher proportion of non-bulky comparison goods (including clothing/footwear/fashion and health/beauty goods). In contrast, whilst the Middlemoor proposal does not limit itself to just bulky comparison goods, the range of permitted goods would be narrower.

As a consequence, we consider that, so long as suitable and robust conditions are placed upon any planning permission for the Middlemoor proposal, there is a material difference with the approach being proposed at Moor Exchange. Moor Exchange is a substantial retail development of the sort normally found on the high street which would not require on-site car parking provision if it were provided on the BCS site. In contrast, the Middlemoor proposal will, due to the type of retail unit and range of goods being sold, have a requirement for such parking provision, and the scale/format of retail units being proposed are unlikely to be able to be accommodated on the BCS site. Therefore, we consider that, so long as suitable and robust controls are placed over the retail floorspace in the Middlemoor application, it can meet the provisions of the sequential test as set out in CP8 of the Exeter Core Strategy and paragraphs 86 and 87 of the new NPPF.

Impact

As required by national planning policy, Sections 5 and 6 of the applicants' RLA provide an assessment of the proposals likely impact on the health of, and investment within, defined 'town centres' across Exeter. We deal with each in turn below.

Impact on the vitality and viability of nearby 'town centres'

The main focus for the applicants' assessment of the impact of the Middlemoor proposal on the vitality and viability of existing 'town centres' is a financial impact assessment. Prior to the preparation of this full planning application, we worked with Burnett Planning, the authors of the RLA, to agree the scope and content of the assessment. As a consequence, much of the assessment is agreed and (A) accords with ECC's evidence base documentation on shopping patterns (and turnover levels) for convenience and comparison goods shopping, and (B) is generally consistent with the data being used to assess the other retail development proposals in Exeter.

The RLA provides three alternative financial impact scenarios in order to take account of the potential variations in occupancy within the scheme. These are:

- Scenario 1 – occupation of the scheme by a high number of furniture, floorcoverings and home furnishings retailers, plus a Smyths toys/game store and Hobbycraft.
- Scenario 2 – occupation by a smaller number of furniture retailers, plus a Decathalon sports/leisure goods store and two units taking advantage of the originally proposed open A1 non-food goods sales from 1,166sq m.
- Scenario 3 – as per scenario 2 but the largest number is now occupied by a foodstore.

Based upon the scheme as originally submitted, we consider that these three scenarios are reasonable although subsequent changes to the controls over the range of goods which can be sold from the proposed Class A1 retail floorspace, indicate that the inclusion of 1,166sq m of unrestricted floorspace in scenarios 2 and 3 can now be removed.

Based upon these three scenarios, the RLA forecasts at between 20%-25% of the scheme's comparison goods turnover will be diverted for the city centre and almost all of the remainder will be diverted from out of centre stores in Exeter, particularly the recently opened IKEA and retail parks/units at Alphington, Rydon Lane, Marsh Barton and Sowton.

In general terms we would agree that a retail park which has a reasonable proportion of bulky goods / furniture operators is likely to compete with out of centre stores to a greater extent than we forecast in our May 2018 advice for the most recent Moor Exchange proposal. However, two matters are of note:

- The proportion of the turnover at the proposed development being diverted from the city centre appears to be low, bearing in mind the city centre still able to achieve reasonably high market shares in bulky goods shopping;
- The list of goods proposed to be sold from the A1 retail units is wider than just furniture/furnishings which are emphasised in paragraph 5.26 of the RLA are the focus for the applicants' letting strategy; and
- Two out of the three trade diversion scenarios are now out of date as the applicants are now no longer proposing that 1,166sq m of A1 floorspace is unrestricted non-food floorspace.

Therefore, we have undertaken our own impact financial impact assessment and this is attached to this advice letter. It follows the same format as our impact assessment for Moor Exchange in May 2018 and:

- Adopts two scenarios – one including a foodstore in Unit R8 and an alternative where no convenience goods sales are present;
- Adopts the same pre-impact store turnover data for convenience and comparison goods floorspace as our May 2018 advice to ECC;
- For the scenario incorporating the foodstore, we have used the turnover from the applicants' Scenario No.1 and replaced the turnover of Wren Kitchens in R8 with the turnover of the foodstore in Scenario No.3.
- For the scenario excluding the foodstore, we have adopted the forecast turnover level from the applicants' Scenario No.1.

The results of our assessment are shown in Tables 2a, 3a and 3b attached to this letter and can be summarised as follows:

- Where a foodstore is included within the scheme, the impact on the convenience goods sector in Exeter city centre will forecast to be -1.1%, rising to -1.9% when the impact of commitments is taken into account.
- The solus impact on the city centre's comparison goods sector is between -1.9% and -2.2%, rising to between -3.0% and -3.3% when the impact of commitments is taken into account. All of these levels are slightly higher, but not significantly so, than the forecasts provided in the RLA.
- The impact on St Thomas district centre is forecast to be around -5%, which is slightly higher than the -2% forecast by the RLA.

In order to understand the significance of these impacts upon the city centre and St Thomas district centre, it is important to reiterate the contents of our May 2018 advice on the most recent Moor Exchange proposal. That advice indicated that the impact of that scheme was similar to the previous Moor Exchange which were heard at public inquiry in December 2015 and it was not ECC's case at the inquiry that this level of direct financial impact would lead to a significant adverse impact upon the health of the city centre. Therefore, given that (A) there is no evidence to suggest that there has been a material change in the health of the city centre in the intervening period, and (B) the direct financial impact of the Middlemoor proposal is lower (due to the restricted range of comparison goods), we see no reason to reach a conclusion that a significant adverse impact is likely to occur.

Therefore, whilst the Middlemoor proposal will have a negative impact upon the financial performance of the city centre, guidance within the NPPG advises that the positive and negative effects of the proposal should be considered alongside other material considerations in the overall planning balance. In particular, we recommend that the following issues are taken into account:

- The direct financial impact of the proposal on the turnover of the city centre, which should be considered a minor adverse impact;
- Given the scale of the proposed Class A retail floorspace – circa 14,100sq m – this will provide, to some extent, a rival shopping destination to the city centre although this would not be to the same extent as forecast for the Moor Exchange proposals due to the limitations on the range of goods which can be sold.
- Whilst retailer relocations from the city centre cannot be ruled out, they are unlikely so long as strict controls are kept in place in relation to the range of goods which can be sold from the Middlemoor development and also the size and number of units which are available.

Turning to St Thomas district centre, we do not consider that a suitably controlled Middlemoor retail development poses a risk to the future health of the centre. Whilst some trade diversion is forecast, the scale of trading overlap is limited and this will limit the risk for the future viability of the centre.

Impact on town centre investment

In line with our advice on the Moor Exchange proposals, the focus for the 'impact on investment' test will be Exeter city centre and St Thomas district centre. In relation to the city centre, the focus has been on investment at the BCS site and ECC held a concern that the original (2015/2016) Moor Exchange proposals would have a significant adverse impact upon the Crown Estate's redevelopment. Whilst the Inspector at the public inquiry shared this view, the Secretary of State's subsequent decision letter concluded that a significant adverse impact was not likely. This conclusion sets the benchmark for re-consideration of the 'impact of investment' issue and we consider that our advice to ECC in relation to the more recent Moor Exchange is applicable to the Middlemoor application:

> *"…….there is no evidence / analysis to suggest that the current Moor Exchange proposal is likely to have a significant adverse impact upon investment on the BCS site. Indeed, even when there was a 'live' redevelopment scheme at the BCS site, the Secretary of State concluded that the prospect of a significant adverse impact was not likely. Given that the Crown Estate scheme, which was the focus for the previous assessment, has now been abandoned, we consider that it would be unreasonable to suggest that the risk of a likely significant adverse impact remains".*

In relation to St Thomas district centre, the presence of large retail units at Exe Bridges has previously been the focus for attention in relation to investment issues. Like the Moor Exchange proposals, the Middlemoor development would also be able to provide large format retail stores although the controls proposed at Middlemoor in terms of the range of goods to be sold would differentiate both locations to a reasonable extent. Indeed, unlike Moor Exchange, the Middlemoor scheme would not be able to attract existing tenants at Exe Bridges save for Marks & Spencer. As a consequence, any concern over the impact on existing investment at St Thomas district centre although if ECC retains some residual concerns then the 'no poaching' restriction suggested for the most recent Moor Exchange proposal could be utilised here.

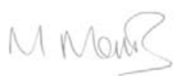
Summary and Conclusions

Given the planning policy status of the Middlemoor site, there is a need to consider whether the proposed retail floorspace meets the provisions of the sequential and impact tests, as set out in the development plan and national planning policy. Our assessment of these tests has taken into account the scale and nature of the proposed retail units and the controls offered by the applicant in terms of the format of the development and range of goods which can be sold. This has led us to the conclusion that the Middlemoor proposal meets the provisions of the sequential test and is unlikely to have a significant adverse impact upon the health of, or investment within, nearby defined 'town centres'. This conclusion of course relies on a number of controls being imposed. Some of which are outlined earlier in this letter, but we repeat them here and also recommend additional controls:

- Limiting units R1-R8 to Class A1 retail purposes only;
- Placing controls on the sale of food to one foodstore of up to 1,951sq m gross and one other unit using no more than 15% of its net sales area for the sale of food;
- Restricting the range of comparison goods sales to those goods outlined earlier in this letter;
- Removing the ability to sub-divide units R1-R8;
- Limiting the amount of net sales area in units R1-R8 to 9,594sq m;
- Restricting Units P1-P3 to Class A3 use only; and
- Given their general non-bulky nature and their common sale from 'town centre' locations, limiting the sale of sports/leisure goods and toys/games to one unit each.

I trust that the contents of this letter provide you with the advice you require in relation to this planning application. However, if you have any queries, or require additional information and advice, then please do not hesitate to contact me.

Yours sincerely



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enc

TABLE 1a: INIDICATE TURNOVER OF MIDDLEMOOR (INCLUDING FOODSTORE)

	NET SALES AREA (sq m)	COMPARISON FLOORSPACE	CONVENIENCE FLOORSPACE	COMPARISON SALES DENSITY (£/sq m)	CONVENIENCE SALES DENSITY (£/sq m)	COMPARISON GOODS TURNOVER (£m)	CONVENIENCE GOODS TURNOVER (£m)
Total						£29.9	£9.3

Notes:

TABLE 1b: INIDICATE TURNOVER OF MIDDLEMOOR (EXCLUDING FOODSTORE)

	NET SALES AREA (sq m)	COMPARISON FLOORSPACE	CONVENIENCE FLOORSPACE	COMPARISON SALES DENSITY (£/sq m)	CONVENIENCE SALES DENSITY (£/sq m)	COMPARISON GOODS TURNOVER (£m)	CONVENIENCE GOODS TURNOVER (£m)
Total						£35.3	£0.0

Notes:

TABLE 2a: CONVENIENCE GOODS IMPACT OF MIDDLEMOOR, 2021

STORE / CENTRE	PRE-IMPACT 2021 TURNOVER (£m)	DIVERSION TO COMMITMENTS (£m)	RESIDUAL TURNOVER (£m)	IMPACT OF COMMITMENTS (%)	DIVERSION TO MIDDLEMOOR (£m)	RESIDUAL TURNOVER (£m)	SOLUS IMPACT (%)	CUMULATIVE IMPACT (%)
Exeter City Centre								
Marks & Spencer, High Street, Exeter	£7.3	£0.1	£7.3	-0.7%	£0.28	£7.0	-3.8%	-4.5%
Sainsbury's, Guildhall Shopping Centre	£20.5	£0.1	£20.4	-0.5%	£0.19	£20.3	-0.9%	-1.4%
Other - Exeter City Centre	£33.8	£0.4	£33.4	-1.2%	£0.19	£33.2	-0.6%	-1.7%
Sub-total	£61.6	£0.6	£61.1	-0.9%	£0.7	£60.4	-1.1%	-1.9%
Heavitree district centre	£2.6	£0.1	£2.5	-1.9%	£0.04	£2.5	-1.5%	-3.4%
St Thomas district centre								
Co-op, Cowick Street, Exeter	£5.6	£0.1	£5.5	-0.9%	£0.00	£5.5	0.0%	-0.9%
M&S Simply Food, Albany Road, Exeter	£3.1	£0.0	£3.1	0.0%	£0.28	£2.8	-9.1%	-9.1%
Tesco Express, Cowick Street, Exeter	£6.5	£0.1	£6.4	-0.8%	£0.00	£6.4	0.0%	-0.8%
St Thomas District Centre	£1.2	£0.0	£1.2	0.0%	£0.00	£1.2	0.0%	0.0%
Sub-total	£16.4	£0.1	£16.3	-0.6%	£0.3	£16.0	-1.7%	-2.3%
Topsham district centre								
Co-op, Fore Street, Topsham	£2.7	£0.4	£2.3	-14.9%	£0.00	£2.3	0.0%	-14.9%
Topsham District Centre	£2.0	£0.3	£1.8	-12.5%	£0.00	£1.8	0.0%	-12.5%
Sub-total	£4.7	£0.7	£4.0	-13.8%	£0.0	£4.0	0.0%	-13.8%
Sidwell Street / Blackboy Road	£0.7	£0.0	£0.7	0.0%	£0.00	£0.7	0.0%	0.0%
Mount Pleasant	£0.0	£0.0	£0.0	0.0%	£0.00	£0.0	0.0%	0.0%
Magdalen Road	£0.3	£0.0	£0.3	0.0%	£0.00	£0.3	0.0%	0.0%
Countess Wear (Topsham Road)	£0.3	£0.0	£0.3	0.0%	£0.00	£0.3	0.0%	0.0%
Countess Wear (Glass House Lane)	£0.6	£0.0	£0.6	0.0%	£0.00	£0.6	0.0%	0.0%
Beacon Lane	£0.3	£0.0	£0.3	0.0%	£0.00	£0.3	0.0%	0.0%
Polsloe Bridge	£0.3	£0.0	£0.3	0.0%	£0.00	£0.3	0.0%	0.0%
Pinhoe	£1.4	£0.0	£1.4	0.0%	£0.00	£1.4	0.0%	0.0%
Whipton	£1.9	£0.0	£1.9	0.0%	£0.00	£1.9	0.0%	0.0%
Exwick Road / Winchester Avenue	£0.2	£0.0	£0.2	0.0%	£0.00	£0.2	0.0%	0.0%
Isleworth Road	£0.0	£0.0	£0.0	0.0%	£0.00	£0.0	0.0%	0.0%
Exeter out-of-centre stores								
Aldi, Alphington Road, Exeter	£30.0	£1.2	£28.8	-4.0%	£0.37	£28.5	-1.3%	-5.2%
Aldi, Exhibition Way, Pinhoe	£20.9	£0.6	£20.3	-2.9%	£0.84	£19.5	-4.1%	-6.9%
Aldi, Topsham	£6.8	£0.0	£6.8	0.0%	£0.14	£6.7	-2.1%	-2.1%
Lidl, Burnthouse Lane, Exeter	£11.6	£1.3	£10.8	-6.9%	£0.56	£10.3	-5.1%	-11.7%
Lidl, Powlesland Road, Exeter	£8.5	£0.8	£7.7	-9.1%	£0.09	£7.6	-1.2%	-10.2%
Morrisons, Prince Charles Road, Exeter	£31.8	£0.7	£31.1	-2.1%	£0.84	£30.3	-2.7%	-4.8%
Sainsbury's, Alphington Road, Exeter	£40.5	£0.9	£39.6	-2.2%	£0.51	£39.1	-1.3%	-3.4%
Sainsbury's, Pinhoe	£47.3	£0.4	£46.9	-0.8%	£2.11	£44.8	-4.5%	-5.3%
Tesco Extra, Russell Way	£40.9	£2.6	£38.2	-6.4%	£1.72	£36.5	-4.5%	-10.6%
Waitrose, Gladstone Road, Exeter	£23.1	£0.4	£22.7	-1.7%	£1.02	£21.7	-4.5%	-6.2%
Iceland, Alphington Road, Exeter	£2.3	£0.0	£2.3	0.0%	£0.00	£2.3	0.0%	0.0%
Other	£3.6	£0.1	£3.5	-1.4%	£0.04	£3.5	-1.1%	-2.5%
Other	£1,054.0	£0.0	£1,054.0		£0.09			

Notes:
Pre-impact 2021 turnover taken from EWEED study.

TABLE 3a: COMPARISON GOODS IMPACT OF MIDDLEMOOR, 2021 (INCLUDING FOODSTORE)

STORE / CENTRE	PRE-IMPACT 2021 TURNOVER (£m)	DIVERSION TO COMMITMENTS (£m)	RESIDUAL TURNOVER (£m)	IMPACT OF COMMITMENTS (%)	DIVERSION TO MIDDLEMOOR (£m)	RESIDUAL TURNOVER (£m)	SOLUS IMPACT (%)	CUMULATIVE IMPACT (%)
Exeter City Centre	£865.2	£9.7	£855.5	-1.1%	£15.85	£839.64	-1.9%	-3.0%
Heavitree district centre	£5.3	£0.0	£5.3	0.0%	£0.00	£5.28	0.0%	0.0%
St Thomas district centre	£8.7	£0.0	£8.7	0.0%	£0.40	£8.28	-4.6%	-4.6%
Topsham district centre	£6.8	£0.0	£6.8	0.0%	£0.00	£6.79	0.0%	0.0%
Sidwell Street / Blackboy Road	£2.4	£0.0	£2.4	0.0%	£0.00	£2.40	0.0%	0.0%
Mount Pleasant	£3.4	£0.0	£3.4	0.0%	£0.00	£3.40	0.0%	0.0%
Magdalen Road	£0.3	£0.0	£0.3	0.0%	£0.00	£0.31	0.0%	0.0%
Countess Wear (Topsham Road)	£0.8	£0.0	£0.8	0.0%	£0.00	£0.76	0.0%	0.0%
Beacon Lane	£0.2	£0.0	£0.2	0.0%	£0.00	£0.17	0.0%	0.0%
Polsloe Bridge	£0.1	£0.0	£0.1	0.0%	£0.00	£0.07	0.0%	0.0%
Pinhoe	£12.0	£0.0	£12.0	0.0%	£0.00	£12.03	0.0%	0.0%
Whipton	£3.4	£0.0	£3.4	0.0%	£0.00	£3.41	0.0%	0.0%
Exwick Road / Winchester Avenue	£0.3	£0.0	£0.3	0.0%	£0.00	£0.31	0.0%	0.0%
Isleworth Road	£0.0	£0.0	£0.0	0.0%	£0.00	£0.00	0.0%	0.0%
Rydon Lane	£27.3	£1.0	£26.3	-3.5%	£2.09	£24.23	-8.0%	-11.2%
Alphington	£12.7	£0.7	£12.0	-5.4%	£0.90	£11.11	-7.5%	-12.4%
Marsh Barton	£49.4	£4.0	£45.4	-8.2%	£1.50	£43.86	-3.3%	-11.2%
Sowton	£72.6	£4.4	£68.1	-6.1%	£2.39	£65.74	-3.5%	-9.4%
Other	£7.1	£0.0	£7.1	0.0%	£0.00	£7.06	0.0%	0.0%
Ikea	£48.0	£0.1	£48.0	0.0%	£5.38	£42.62	-11.2%	-11.2%
Other	£1,109.9	£29.9	£1,080.0	-2.7%	£0.90	£1,079.10	-0.1%	-2.8%

Notes:
Pre-impact 2021 turnover taken from EWEED study.

TABLE 3b: COMPARISON GOODS IMPACT OF MIDDLEMOOR, 2021 (EXCLUDING FOODSTORE)

STORE / CENTRE	PRE-IMPACT 2021 TURNOVER (£m)	DIVERSION TO COMMITMENTS (£m)	RESIDUAL TURNOVER (£m)	IMPACT OF COMMITMENTS (%)	DIVERSION TO MIDDLEMOOR (£m)	RESIDUAL TURNOVER (£m)	SOLUS IMPACT (%)	CUMULATIVE IMPACT (%)
Exeter City Centre	£865.2	£9.7	£855.5	-1.1%	£18.71	£836.78	-2.2%	-3.3%
Heavitree district centre	£5.3	£0.0	£5.3	0.0%	£0.00	£5.28	0.0%	0.0%
St Thomas district centre	£8.7	£0.0	£8.7	0.0%	£0.40	£8.28	-4.6%	-4.6%
Topsham district centre	£6.8	£0.0	£6.8	0.0%	£0.00	£6.79	0.0%	0.0%
Sidwell Street / Blackboy Road	£2.4	£0.0	£2.4	0.0%	£0.00	£2.40	0.0%	0.0%
Mount Pleasant	£3.4	£0.0	£3.4	0.0%	£0.00	£3.40	0.0%	0.0%
Magdalen Road	£0.3	£0.0	£0.3	0.0%	£0.00	£0.31	0.0%	0.0%
Countess Wear (Topsham Road)	£0.8	£0.0	£0.8	0.0%	£0.00	£0.76	0.0%	0.0%
Beacon Lane	£0.2	£0.0	£0.2	0.0%	£0.00	£0.17	0.0%	0.0%
Polsloe Bridge	£0.1	£0.0	£0.1	0.0%	£0.00	£0.07	0.0%	0.0%
Pinhoe	£12.0	£0.0	£12.0	0.0%	£0.00	£12.03	0.0%	0.0%
Whipton	£3.4	£0.0	£3.4	0.0%	£0.00	£3.41	0.0%	0.0%
Exwick Road / Winchester Avenue	£0.3	£0.0	£0.3	0.0%	£0.00	£0.31	0.0%	0.0%
Isleworth Road	£0.0	£0.0	£0.0	0.0%	£0.00	£0.00	0.0%	0.0%
Rydon Lane	£27.3	£1.0	£26.3	-3.5%	£2.47	£23.86	-9.4%	-12.6%
Alphington	£12.7	£0.7	£12.0	-5.4%	£1.06	£10.95	-8.8%	-13.7%
Marsh Barton	£49.4	£4.0	£45.4	-8.2%	£1.77	£43.59	-3.9%	-11.8%
Sowton	£72.6	£4.4	£68.1	-6.1%	£2.82	£65.31	-4.1%	-10.0%
Other	£7.1	£0.0	£7.1	0.0%	£0.00	£7.06	0.0%	0.0%
Ikea	£48.0	£0.1	£48.0	0.0%	£6.35	£41.65	-13.2%	-13.2%
Other	£1,109.9	£29.9	£1,080.0	-2.7%	£1.06	£1,078.94	-0.1%	-2.8%

Notes:
Pre-impact 2021 turnover taken from EWEED study.