

Exeter Plan

Moor Exchange Retail Park: Hearing Note

May 2026

Exeter City Council
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1. Introduction

- 1.1. At the Exeter Plan examination hearing held on 4 March 2026, retail issues were discussed within the Matter 2 session.
- 1.2. Attending the hearing were Growen Estates, represented by Rocke Associates, the promoters of the Moor Exchange site on Honiton Road to the east of the city. A location plan of the site is included in Appendix A. This is part of the Monkerton/Hill Barton urban extension allocated in the adopted Exeter Core Strategy (SUP-DPD-01).
- 1.3. The Exeter Plan does not identify Moor Exchange as either a District or Local Centre, which are the town centre designations included in the Plan.
- 1.4. The position articulated by Growen Estates is set out in their Regulation 19 representation to the Plan (C-21-08: page 9). The representation raises concern about policy RFC2 because of the:

‘Failure to identify land north of Honiton Road, west of Fitzroy Road, south of Myrtlebury Way and east of the Exeter-Exmouth Railway Line as a District Centre’.
- 1.5. This position is explored further in the hearing statement for matter 2 session (PS2: C-21, paragraph 2,2, page 4).
- 1.6. Following a lengthy discussion at the hearing, the Inspectors requested that a note be submitted to the examination explaining the Council’s position on the matter. This note comprises the submission.
- 1.7. The note is structured as follows:
 - Local planning policy
 - Evidence review
 - Moor Exchange as an out of centre retail park
 - Application history
 - Conclusion

2. Local planning policy

- 2.1. The current, adopted Development Plan documents produced by the City Council are the following:
- Exeter Local Plan First Review (adopted 2005) and
 - Core Strategy (adopted 2012).
- 2.2. Once adopted, the Exeter Plan will replace all policies within these two documents.
- 2.3. In addition to the adopted Development Plan documents, the area is also covered by the Monkerton and Hill Barton Masterplan which was adopted for development management purposes in 2010. The masterplan was prepared as guidance to provide a framework for the development of the Monkerton and Hill Monkerton/Hill Barton strategic allocation, made in the Exeter Core Strategy.

Exeter Local Plan First Review (SUP-DPD-02)

- 2.4. The adopted Exeter Local Plan First Review (the Local Plan) includes a chapter covering shopping and commercial leisure (chapter 5, page 41). This includes policy S1 which proposes retail development at Princesshay, the former bus and coach station, the Guildhall Shopping Centre and the Quay and Canal Basin area. These allocations do not cover the Moor Exchange site.

Exeter Core Strategy (SUP-DPD-01)

- 2.5. The adopted Core Strategy includes Policy CP8 on retail provision (SUP-DPD-01: CP8, page 38). This states that:

‘Local retail facilities will be required as part of the community provision at the Monkerton/Hill Barton and Newcourt urban extensions’.

- 2.6. Moor Exchange is within the Monkerton/Hill Barton allocation, so there is policy support for a specific element of retail provision at the site. This is however specifically limited to retail necessary for local provision.
- 2.7. The Core Strategy also includes Policy CP19 (which covers the current strategic allocations for the city: Newcourt, Monkerton/Hill Barton and an area south of Alphington. As already stated, the Moor Exchange site is within the Monkerton/Hill Barton area, on the southern edge of the allocation.

- 2.8. Policy CP19 (SUP-DPD-01: CP19, page 74) states that:

‘The Monkerton/Hill Barton area (identified on plan 2, page 101) is proposed for around 2,500 dwellings, around 5 hectares of employment land and all associated infrastructure including:

- Local centre to provide shops, doctors surgery and community facilities’.

- 2.9. This clearly identifies the need for a single local centre in the allocation but does not define the location of this provision. The policy does not make provision for a District Centre.

Monkerton and Hill Barton masterplan (EXM-06c)

- 2.10. The adopted masterplan for the Monkerton and Hill Barton strategic allocation covers the Moor Exchange site. It identifies Moor Exchange for employment (EXM-06c: figure 5.5, page 50). The masterplan also indicates two locations for new centres (EXM-06c: figure 5.5, page 50). These are in the north (at Pilton, adjacent to Sainsburys on Pinhoe Road) and in the south-west (at Hill Barton). The Pilton centre is described as a district centre and the Hill Barton centre is described as a local centre (page 36).
- 2.11. Neither centre has come forward as envisaged. However, significant, additional retail and town centre uses have been delivered immediately to the north of the allocation on Pinhoe Road. These include a new Lidl supermarket, a recently redeveloped Aldi and a public house within the allocation in the Pilton area. Additional services have also come forward at the existing Sainsbury's supermarket which, again, is in the Pilton area. Town centre uses in what would have been the Pilton District centre have therefore been delivered. Whilst the local centre at Hill Barton has not been delivered, the site is safeguarded alongside a potential railway station by Policy STC7 (point a) of the Exeter Plan. This is also shown on the Exeter Plan Policies Map (CSD-04a).

The Exeter Plan

- 2.12. The Publication Exeter Plan (CSD-02), including suggested modifications set out in the Schedule of Suggested Modifications (CSD-03: SMM56 on page 23 and SMM97 on page 42) and those additionally discussed at the hearing (not yet published), contains two retail policies. These are RFC1: The future of our centres and RFC2: Development in, and affecting, our centres. Together these provide a positive strategy for the city centre and the local and district centres in Exeter (the town centres in the Plan).
- 2.13. Policy RFC1 provides the strategic overview of the policy approach to the centres, stating the need to '...protect and enhance the vitality, viability and resilience of the city centre, district centres and local centres to increase prosperity, provide a wider range of services and minimise the need to travel'.
- 2.14. The supporting text (CSD0-02: paragraphs 8.3–8.17) identifies the centres in Exeter, including the city centre, district centres (Topsham, Heavitree and St Thomas) and a series of local centres. As it would be an out of centre retail park, Moor Exchange is not included in the list of centres.
- 2.15. Policy RFC2 (as per suggested modification SMM56) goes on to provide policy support for retail in the centres, convenience retail at all the strategic mixed use brownfield allocations, and larger scale and comparison retail at SBA2: East Gate and SBA4 Exe Bridges Retail Park. The policy also clearly states the limited circumstances in which town centre uses (including retail) outside the centres may be considered appropriate; this starts from a premise of proposals not being permitted unless assessed through the sequential test and, for larger retail proposals, an impact assessment. The presumption against out of centre retail is also addressed specifically in the supporting text (CSD-02: paragraphs 8.20 – 8.22), which explains the negative impact such retail can have on the viability and vitality of the centres, their reliance on car travel and associated environmental impacts and the challenges they provide for inclusive access.

- 2.16. Finally, based on updated retail evidence (discussed in chapter 3 of this note), the Exeter Plan does not allocate specific sites for town centre uses. Instead, it focuses such uses, including retail, on the city centre and two of the strategic mixed use brownfield allocations in the plan at East Gate (SBA2) and Exe Bridges Retail Park (SBA4) reflecting the current retail already provided at these sites. Moor Exchange is not allocated in the Exeter Plan.

Definitions of centres

- 2.17. District centres are defined in the Exeter Plan glossary (SUP-02: page 4) and the Core Strategy glossary (SUP-DPD-01: page 112) as:

‘A group of shops normally containing at least one supermarket or superstore and a range of non-retail services and public facilities’.

- 2.18. Moor Exchange does not meet this definition: although subject to an outline planning consent for retail uses (19/1461/OUT), the reserved matters application has not been approved and therefore no such development has been delivered.
- 2.19. In addition, the outline consent parameter plan (EXM-06d) shows that the consented proposal would not deliver development meeting this definition: it would deliver one large A1 unit (shops), one A1/A2/A5/D1 unit (shop, Financial and professional services, hot food takeaways, D1 Non-residential institutions) and three A3 units (restaurants/café) which, given the proposed site layout, would resemble drive-through restaurants. Through a number of non-material amendments to the outline consent, these use classes have been updated and floorspace restrictions for each use class in each block have been added. The latest non-material amendment (22/1520/NMA) allows the following use classes: E(a) (retail), E(c) (finance, professional and other services), E(b)/sui generis (restaurants and cafes including take-out and drive-throughs and E(d) (indoor sport/recreation/fitness. The outline consent and the latest non-material amendment would not provide for a suitably wide ‘range of non-retail services and public facilities’ to meet the definition of a district centre.
- 2.20. This position becomes particularly stark when the proposals at Moor Exchange are compared with the offer at the three existing District Centres at Topsham, Heavitree and St Thomas.
- 2.21. All three of these district centres were historic settlements in their own right: they have been absorbed into the urban area of Exeter as the city has grown. Each therefore serves a local community and has its own specific identity and high street. This evolution also means that these district centres include a large number and variety of shops, food and beverage, services and facilities. This range and diversity will not be provided at Moor Exchange due to the relatively small area of the site.
- 2.22. By way of a direct comparison, the City Centre, Primary Shopping Area and District and Local Centre Review (the centres review document) (EXM-02q1) shows the number of commercial premises in each of the district centres. The figures are set out below:

¹ Available at: <https://exeter.gov.uk/media/ls0jtpi/exm-02q-post-submission-city-centre-primary-shopping-area-and-centres-review.pdf>

- Topsham: More than 90.
- Heavitree: More than 50
- St. Thomas: More than 100.

2.23. If Moor Exchange is developed as per the outline permission, it is likely to provide accommodation for between 5 and 10 outlets. On this basis, it is clear that it will not function as a district centre.

2.24. Finally, the Exeter Plan glossary includes a definition of town centres (SUP-02: page 12). This includes the following:

‘Area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.’

2.25. This approach clearly reflects the City Council’s position that Moor Exchange, as an out of centre development site, cannot be considered as a district centre.

Summary

2.26. The Core Strategy is currently the key adopted Development Plan Document for the site. Through Policy CP19, the Core Strategy states the need for a single local centre at Monkerton/Hill Barton. It is of note that the Core Strategy was adopted after the Monkerton and Hill Barton masterplan which sets out the need for two centres. It takes precedent. The Core Strategy does not refer to the need for a District Centre at Monkerton/Hill Barton.

2.27. Additional retail provision has been made to the north of the allocation on Pinhoe Road since the Core Strategy and Masterplan were adopted. A site for a railway station and other uses is safeguarded at Hill Barton by policy STC7(a) of the Exeter Plan.

2.28. The Core Strategy does not allocate the Moor Exchange site for a specific use, whilst the Masterplan identifies it for employment.

2.29. The Exeter Plan identifies the limited need for additional retail in Exeter and sets out a strategy for meeting residual needs in the city centre and the district and local centres together with the strategic mixed use brownfield allocations. This approach aims to protect the vitality of the centres. Moor Exchange is not identified as a centre in the Plan.

2.30. Moor Exchange does not meet the definitions of district or town centres provided in the Core Strategy and Exeter Plan glossaries.

3. Evidence review

Retail study update

- 3.1. The Exeter Retail Study Update document (EXM-02v) provides up-to-date evidence on the need for retail land uses in the city to 2042 (EXM-02v: paragraphs 3.34-3.39, pages 29-30). It provides an update to the quantitative need assessment in the Greater Exeter Town Centre and Retail Study Part Two (2019) (EVB-RFC-01b), along with an assessment of qualitative factors of need for retail floorspace across Exeter.
- 3.2. The Update identifies that there is no city-wide need for net additional convenience goods floorspace and no requirement to plan for large-scale food store/supermarket units. Instead, any need for new provision should be directed towards two areas. First, part of any demand for new convenience goods floorspace should be accommodated via the town centres first approach as and when opportunities arise. Second, new provision should be directed towards areas of regeneration and high residential growth, to ensure that local communities have easy and convenient access to day-to-day convenience provision.
- 3.3. The Update also states that there is no pressing need to identify land for the provision of new comparison goods retail floorspace. It finds that demand for comparison goods retail provision has dropped to such a level that existing and committed floorspace, and continued comparison retail at the Exe Bridges Retail Park (SBA4) and East Gate (SBA2), are able to meet the (expenditure) demand from consumers and from the commercial retail sector.
- 3.4. The existing retail permission at Moor Exchange (19/1461/OUT), which is discussed in more detail in chapter 5 of this note, is taken into account in the assessments of future needs for both large scale food retail and comparison retail. However, the future demand is such that if this permission does not come forward, needs will still be met by existing provision and commitments.

City Centre, Primary Shopping Area and District and Local Centre Review

- 3.5. The Exeter Plan provides a list of centres in Exeter in the supporting text at paragraph 8.14. These include the city centre, three District Centres and a series of Local Centres. The Moor Exchange site is not listed as a centre.
- 3.6. To inform the list of centres, the City Council prepared the City Centre, Primary Shopping Area and District and Local Centre Review (the centres review document) (EXM-02q).
- 3.7. This work involved a desk-based assessment of commercial uses outside the city centre using the Local Street Gazetteer to identify the District and Local Centres. The District Centres provide a larger number and wider range of higher order retail and commercial facilities with a larger catchment. The Local Centres provide lower order services serving a smaller local community. The assessment reviewed the boundaries of the existing District and Local Centres as defined in the current Local Plan First Review (SUP-02: pages 180-187) and

also looked at additional clusters of commercial properties to identify new centres.

- 3.8. The assessment of the centres is included in Appendix 3 of the centres review document (EXM-02q, page 10). This work confirms the status of the existing District and Local Centres and also identified five new Local Centres.
- 3.9. The assessment does not cover the areas in Exeter considered to be out of centre retail parks because these do not have the characteristics of traditional centres at the heart of local communities, providing access to local services through significant active travel. As already stated, the number of commercial premises which would be provided at Moor Exchange would be significantly lower than the number present at the three designated District Centres.

Summary

- 3.10. Two evidence documents have been compiled to support the retail policies in the Exeter Plan.
- 3.11. The Retail Study Update (EXM-02v) identifies that there is no city-wide need for net additional convenience goods floorspace and no requirement to plan for large-scale food store/supermarket units. It also concludes that there is no pressing need to identify land for new comparison goods retail floorspace and that needs can be met in the city centre and at the strategic brownfield allocations at East Gate and Exe Bridges Retail Park.
- 3.12. The City Centre, Primary Shopping Area and District and Local Centre Review (EXM-02q) identifies the centres in Exeter. It does not identify Moor Exchange as a District or Local Centre.
- 3.13. Notwithstanding the recognition that the Moor Exchange site has outline permission for retail uses, taken together, the two evidence documents show that there is no need for retail provision at Moor Exchange to meet future demand. The evidence does not identify the site as District or Local Centre.

4. Moor Exchange as an out of centre retail park

- 4.1. The City Council considers Moor Exchange to be an out of centre retail park. On this basis, it has not been identified as a District or Local Centre in the Exeter Plan.
- 4.2. The locational and functional characteristics of Moor Exchange support the City Council's view that it would be an out of centre retail park:
 - It is close to the eastern edge of Exeter close to employment areas such as Sowton and the Met Office.
 - It has convenient road access from both the M5 and the A30 at junction 29, which is approximately 1km from the site. This location will attract trips from the wider sub-region.
 - It is adjacent to Honiton Road, one of the principal radial routes providing access into Exeter, encouraging car trips.
 - The outline permission for the site (19/1461/OUT) provides for a built-form which reflects a traditional out of centre retail park, including two large retail units and three drive-through style food and beverage units as shown on the parameter plan (EXM-06d).
 - The parameter plan within the current reserved matters application (undetermined to date) (EXM-06b) includes 376 parking spaces; a clear indication of the anticipated strategic function of the site.
 - The proposals no longer include a direct public transport route to the wider residential development to the north of the site, reducing sustainable transport options and encouraging car trips.
- 4.3. These characteristics are consistent with other out of centre retail parks in Exeter, including:
 - Rydon Lane Retail Park, Rydon Lane.
 - Stone Lane, Marsh Barton Road.
 - Bishops Court Retail Park, Sidmouth Road.
- 4.4. All these sites are close to the edge of the city, on radial routes. They serve employment areas, have large areas of parking and provide a mix of large retail units, some with drive-through food and beverage outlets. None of these sites are identified in the Exeter Plan, Core Strategy or Local Plan First Review as centres. They are consistently described as out of centre retail parks.
- 4.5. In addition to the location and characteristics of Moor Exchange clearly demonstrating that it is an out of centre retail park, this terminology was used repeatedly by the site promoters at the Exeter Plan hearing session.
- 4.6. In addition, at the hearing, reference was made to the function of Moor Exchange serving the wider Exeter area, including significant development in East Devon, east of the M5.
- 4.7. Finally, reference was made at the hearing to the need for Moor Exchange to be designated as a District Centre to protect the investment made in the site as a result of concerns regarding the potential for competition from alternative out of centre retail parks. It would not be appropriate for a local plan to designate a site for a particular use in order to protect investment. Furthermore, the City Council is not aware of any competition from alternative sites; indeed, national

and Exeter Plan policy is steering development away from out of centre locations due to concerns over the viability and vitality of the centres. Policies RFC1, RFC2 and S1 in the Exeter Plan include provisions to protect the city's centres.

Summary

- 4.8. The location of Moor Exchange and the approved outline application show the site to be an out of centre retail park. This has been demonstrated further by the Regulation 19 representation and hearing statement provided by the site promoters which has been consolidated by verbal evidence given at the Matter 2, Issue 4 hearing session on 4 March 2026. The City Council's position is that it would be inappropriate to designate an out of centre retail park as a District or Local Centre: no comparable sites in Exeter are covered by this designation.

5. Application history

- 5.1. The Moor Exchange site has a lengthy planning history associated with retail and leisure development proposals. Prior to granting outline planning permission 19/1461/OUT in 2020, the City Council determined a number of previous applications for a similar form of large-scale development.
- 5.2. One application of particular note is 14/1615/01, which was refused by the City Council and was appealed (APP/Y1110/W/15/3005333). The appeal was recovered by the Secretary of State and dismissed on 30 June 2016 (EXM-06e). The parameters plan for the appeal shows the form of the proposal (EXM-06f).
- 5.3. The content of the appeal proposal parameters plan (EXM-06f) should be compared with the content of the current reserved matters proposed site layout plan (EXM-06b) and the outline planning permission parameters plan (EXM-06d). There are clear similarities including:
 - The arrangement of the proposed large retail units around a large surface level car parking area
 - The amount of proposed floorspace and
 - The provision of three smaller units in the south-eastern part of the site.
- 5.4. During the appeal, it was argued by CPG (Growen Estate's development partner) that the proposal was a Local Centre and that the Monkerton and Hill Barton Masterplan (EXM-06c) contemplated more than one centre and referred to the provision of a District Centre. However, paragraph 11.11 of the Inspector's report confirms that the requirement to deliver the strategic allocations in line with their masterplans was deleted from the final version of the adopted Core Strategy. Both the Inspector and the Secretary of State concluded that the appeal proposal was not a Local Centre and therefore contrary to the development plan strategy for the local area.
- 5.5. Subsequent to the appeal scheme being dismissed in 2016, a similar application was submitted to the City Council in 2018 and subsequently withdrawn following a Planning Committee decision to refuse it for not fitting the characteristics of a local centre. A second application was submitted in 2018 with slightly less floorspace and withdrawn in 2019 following a Planning Committee decision to refuse it for still not fitting the characteristics of a local centre and adverse impact on air quality.
- 5.6. A repeat application was submitted in 2019 and was approved in 2020 (the 2020 outline permission). A copy of the decision notice is appended (at Annex 1) to the hearing statement from Growen Estates (PS2: C-21) and available online². The 2020 outline permission scheme was treated as an out of centre retail and leisure proposal by the City Council and subject to the sequential and impact policy tests. The officer's report to planning committee included in the Growen Estates hearing statement explains the similarities and differences between the 2020 outline permission scheme and previous schemes (PS2-c21: Annex 2, third paragraph, page 20). Of particular note is the reduction in the scale of proposed retail floorspace and the commitment to deliver at least

² Available at:

https://planningdocs.exeter.gov.uk/servlets/direct/KiqinKJQ1VjuD56iAsLHFf0xiRJ/2/489937/2/1/AS_PD_F_FILE

1,000sqm of the approved retail floorspace as a food store for the sale of convenience goods. This proposal was a change from the content of previous schemes and was a key reason allowing the City Council to support the 2020 outline permission (in contrast to all of the previous proposals).

- 5.7. During the hearing session for Matter 2, Issue 4 on 4 March 2026, it was suggested by Growen Estates that the comment by officers in the committee report for 19/1461/OUT that 'in terms of scale, the proposal probably sits somewhere between a local centre and district centre when considering the sizes of existing centres in the city' was supported by advice from an external consultant regarding retail and town centre planning policy matters. The City Council can confirm that this is not the case, and no such advice was provided.
- 5.8. It is appropriate to note the content of (and reasons for) conditions 38-45 of the 2020 outline permission decision notice³. These conditions were imposed in order:
- To control the development to the scale and format assessed at the application stage
 - To provide a range of uses in line with the intention of the development
 - To avoid any unacceptable impacts and
 - That a food-store is delivered as part of the development.
- 5.9. These conditions are essential to manage the type and scale of retail uses considered appropriate on site, to ensure that the site does not undermine the vitality of the city centre and St Thomas District Centre. The designation of the site as a District Centre will preclude the City Council from being able to appropriately manage the type, and scale of retail and other main town centre uses which could come forward on the site. This will mean that the resulting development is more likely to have a negative impact on the city centre and St Thomas District Centre.
- 5.10. Following the grant of outline planning permission in February 2020, a reserved matters application was made in January 2023 (less than one month prior to the deadline for submission of these details). The proposed detailed site layout plan (EXM-06b) shows five large units in Block A and one unit (containing ground and mezzanine floorspace) in Block B. There are also single units in Blocks C, D and E.
- 5.11.** As of May 2026, the Reserved Matters application remains undetermined, with a number of matters still unresolved. These include: the impact on the amenity of neighbouring dwellings to the north due to the absence of a landscape buffer; the need for updated drainage details to reflect revised drawings; screening and arboriculture matters relating to the northern boundary; sub-station design, positioning and ground changes; landscape layout improvements; the need for footway widening at the southern boundary;

³ Available at:

https://planningdocs.exeter.gov.uk/servlets/direct/KiqinKJQ1VjuD56iAsLHFf0xiRJ/2/489937/2/1/AS_PD_F_FILE

building elevation design; renewable energy details; and staff cycle parking details.

- 5.12. It is also of note that the reserved matters application is required to be determined by the City Council's planning committee (and not under delegated authority to officers).
- 5.13. Following the grant of outline planning permission, a series of 'discharge of condition' and non-material amendment applications have been submitted. These have been approved in whole or in part.
- 5.14. A proposed change to the amount of convenience goods floorspace within the development is notable as it would materially downgrade the scale of food-store to be provided. The original (and current) requirement is for a minimum of 1,000sq m to be used for the sale of convenience goods. At that scale of provision, a reasonably large food store would be provided, capable of serving a range of main and top-up food shopping needs. The proposed downgrading to only 700sq m would remove the ability to provide a food store of that type. As set out in the officer's report, the provision of a food retailer 'formed a key part of the original site design' and 'the provision of a convenience retailer forming part of the original acceptability of the scheme' (see pages 10 and 11 of EXM-06h).
- 5.15. In addition, it is noteworthy that a further (unsuccessful) attempt to amend a condition relating to the retail floorspace/land use controls was proposed through 23/1268/NMA. This related to condition 45 on the outline permission, which prevents a current occupier in any of the city's 'town centres from occupying the Moor Exchange development unless a commitment is made to keep open the 'town centre' store for a minimum of 5 years.

Summary

- 5.16. Outline permission for retail provision was granted in 2020 (19/1461/OUT) following previous applications on the site. This was treated as an out of centre retail and leisure proposal.
- 5.17. The uses permitted on site are of a scale and nature to be considered as an out of centre retail park.
- 5.18. The subsequent reserved matters application has not yet been determined.
- 5.19. A series of conditions imposed on the permission carefully restricts the scale and type of uses on site.
- 5.20. The designation of the site as a District Centre would preclude the City Council from being able to appropriately manage the type of and scale of retail and other main town centre uses which could come forward on the site. This would mean that the resulting development would be more likely to have a negative impact on the city centre.

6. Conclusion

- 6.1. This note responds to the request by the Exeter Plan examination Inspectors to provide a summary of the City Council's position on the Moor Exchange Retail Park. It provides the justification for excluding the site from the list of District Centres included in the Publication Exeter Plan (CSD-02: paragraph 8.14, page 68).
- 6.2. There are a series of reasons which justify the exclusion of Moor Exchange from the list of District Centres:
 - Policies CP8 (retail) and CP19 (urban extensions) of the Core Strategy (SUP-DPD-01) state that a Local Centre is required at Monkerton and Hill Barton. Core Strategy policy does not, therefore, require a District Centre at Moor Exchange.
 - The Monkerton and Hill Barton masterplan (EXM-06c) includes two potential centres for a Local Centre. Significant additional food retail and a pub have come forward within and adjacent to one of the centres shown on the masterplan, whilst the other centre is safeguarded in the Publication Exeter Plan. The Moor Exchange site is shown as employment on the masterplan. The adopted masterplan does not, therefore, require a District Centre at Moor Exchange.
 - The Retail Study Update (EXM-02v) identifies that there is not a city-wide need for net additional convenience goods floorspace, no requirement to plan for large-scale food store/supermarket units and no pressing need to identify land for the provision of new comparison goods retail floorspace. Retail evidence therefore demonstrates that there is no need for retail provision, and thus no need for a District Centre, at Moor Exchange.
 - The Local and District Centres Review (EXM-02q) assesses the number of commercial properties in the centres which are currently, and are proposed in the Exeter Plan to remain as, District Centres (Topsham, Heavitree and St Thomas). All three have vastly more commercial properties than would be provided at Moor Exchange. Therefore, Moor Exchange does not justify designation as a District Centre when compared to the other centres.
 - Following on from this comparison, Moor Exchange does not meet the definition of a District Centre provided in the Exeter Plan glossary (SUP-02: page 4).
 - Moor Exchange is on the eastern edge of Exeter, located close to the M5 and A30 and served directly by Honiton Road, one of the radial routes into the city. The strategic access is therefore characteristic of an out of centre retail park, not a District Centre.

- The scheme that has outline permission (19/1461/OUT), and the associated reserved matters application (EXM-06b), includes two large retail units, three drive-through kiosk buildings and 376 parking spaces. This is demonstrably characteristic of an out of centre retail park, not a District Centre. Designation as an out of centre retail park would therefore be inappropriate.
 - None of the other out of centre retail parks in Exeter have been designated as District Centres in the adopted development plan. None are proposed to be designated as District Centres in the Publication Exeter Plan. A designation for Moor Exchange would be inconsistent with this approach.
 - Moor Exchange was consistently referred to as a retail park by the promoters at the Exeter Plan hearing. This, not a District Centre, reflects the location and function of the site.
 - The promoters stated at the Exeter Plan hearing that a district centre designation is needed to protect the investment made in the site due to competition from other sites. This is not the role of the planning system. However, it should be acknowledged that the existing outline permission provides this security. The City Council is not aware of any similar schemes in the area and, furthermore, such proposals would not be in accordance with planning policy.
- 6.3. In summary, the Moor Exchange site should not be designated as a District Centre in the Exeter Plan. Such a designation would enable open retail to come forward on the site. This would undermine the viability and vitality of the city centre and St Thomas District Centre, contrary to policies RFC1, RFC2 and S1 which provides the spatial strategy for the plan. It would also be inconsistent with policy in chapter 7 of the NPPF.
- 6.4. Following a review of this note, the City Council would invite the Inspectors to undertake a site visit to Moor Exchange and the surrounding area to inform their deliberations.

APPENDIX A: Moor Exchange – Location plan

