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Chief Executive  
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21 September 2012

Dear Mr Maye

**Analysis of Derry/Londonderry Retail Study - August 2012 as prepared by  
Department of Environment, Strategic Planning Division.**

I refer to the Department of Environment, Strategic Planning Division's Retail Study for Derry/Londonderry as published on the Department's web site in August 2012.

I should advise you that NIIRTA is extremely disappointed with the Department's recently completed Retail Study for Derry/Londonderry in terms of its lack of balance in the overall assessment of the retail need for the city, the partial nature of the background provided to the Retail Study and the conclusions drawn from the report which pave the way for Departmental decisions on nine current retail applications.

Although the Department has indicated that no decision has been made, it is clear from the way that the document has been written, that it is intended to provide "*a post rationalisation*" of the Department's position. This was outlined by the Director of Strategic Planning in her letter to the Planning Appeals Commission on 9 February 2012, when she indicated that "*the Department has been able to come to a decision on two of these schemes which includes Tesco's reduced proposal at Buncrana Road*". It is evident from the recent Retail Study that the Department is intent on approving the application at Crescent Link Retail Park (ASDA) and also the Tesco proposal at Buncrana Road. The conclusions make this very clear and the report has been written in a way to try to justify these two applications being approved.

NIIRTA does not regard the Retail Report as being an adequate tool upon which to determine these applications and the report does not fulfil the scope of a Retail Capacity Study, which we were led to believe was being prepared by the Department. We have been awaiting this report for some 6 months and it was supposedly on this basis that the Department withdrew from the Public Inquiry in respect of Buncrana Road. In NIIRTA's view the document as published is not "*fit for purpose*", is inadequate and requires to be more realistic. In short there is a lack of qualitative and quantitative research. A clear indication and justification of the location and the amount of retail floorspace needed in each sector of the city is required and the mitigation measures to protect the city centre.

**Introduction**

The introductory section does not adequately set out the background to the nine applications. Indeed the paragraph is factually incorrect as there are at least 10

current retail applications or perhaps 11 in Derry city, depending on how they are counted. The Fort George application (A/2012/0335/O) is not even referred to even though there is a substantial retail element (3,927 sq m) encompassed within the proposal. Secondly there are two applications on the Bunrana Road site (Tesco), which the Department appear to have counted as a single proposal. The lack of accuracy is a recurring theme throughout the Study undermining its credibility. The aim of the Retail Study is set out in a very simplistic explanation without clearly defining its objectives and purpose. There is no adequate explanation of the background to the Retail Study, how it came about, what weight and status it will have. There has been no public consultation period and it appears to merely be window dressing to justify and post-rationalise decisions that have already been made and mitigated against multiple Judicial Reviews that are likely to arise.

A much more open and transparent explanation by the Department would have been more convincing, that it had reached an opinion to refuse permission for both the Tesco applications at Bunrana Road and had requested a public inquiry to be held before the Planning Appeals Commission (PAC). This would have been more persuasive of a neutral opinion and a balanced approach.

An up-front admission of an apparent “u-turn” by the Director of Strategic Planning when the Department was unable to produce its Statement of Case by the due date to the PAC and withdrew from the Public Inquiry under the claim that a “*fundamental review of the retail applications in Londonderry*” was taking place and would be available shortly. This approach convinced no one and the subsequent 6 months work to produce this less than adequate report has simply reinforced the image of a Department trying to justify their view. This was unnecessary and could easily have been presented at the Public Inquiry and been subject to public scrutiny. The approach followed has simply reinforced this untenable position.

### **Current Applications**

The Department summarises the position on each of the applications, although it excludes any reference to Ford George as mentioned in my opening comments in the introduction. The Department in its statement on each application is less than accurate, which gives the impression of a “*fait accompli*” by the Department and a less than forthright approach. The Department omits any reference to the location of each application in policy terms, which would have been helpful. Indeed a statement to the effect that all of the proposals are “*out of centre*” except where outlined would also have been of assistance.

The second paragraph referring to the Tesco proposal at Bunrana Road (A/2009/0212/F) does not reflect the correct position. There is no reference to the Article 31 determination, the Notice of Opinion to Refuse permission issued on 29 March 2009, or the Public Inquiry request, which was to commence in April 2012.

The third paragraph does not correctly reflect the correct position in respect of the McCormick application (A/2006/0180/O) at Skeoge on Bunrana Road (Whitehouse). There is no reference to the Article 31 determination, the issue of the Notice of Opinion to Refuse (NOP) permission on 22 November 2010 and the Minister’s statement that the Department has not consulted Donegal County Council in the Republic of Ireland (ROI) so that the NOP had to be withdrawn to allow consultation.

Rosstowney Road (A/2012/0261/O) is the only application where the location in policy terms is referred to. The proposal is sited immediately outside the Derry/Londonderry Central Area and is considered to be “*an edge of centre*” location.

Springtown District Centre (A/2010/0966/F) is referred to even though a previous approval for an extension to the centre has been approved (A/2003/0966/F). At the same time the Department has recently approved two applications during the preparation of the Retail Study for the redevelopment of two existing District Centres at Lisnagelvin (A/2007/0145/F) and Northside (A/2010/0337/F). It would have been more logical to complete the picture with these included.

### **Catchment Area**

NIIRTA notes that for convenience retailing the Department has used a 15 minute drive time, which is the accepted norm for defining a catchment area. The 2001 census has been used to define the drive time isochrones and the Department has estimated the catchment population to range between 96,463 and 106,311 in 2001. When this is projected forward the Department estimates the population by the base year 2012 to be between 104,156 and 114,789 and between 106,358 and 117,217 at the design year 2015. It is unclear why the 2011 census figures were not used as a more accurate base.

The Department has updated the per head expenditure figures at 2009 for both the base and design years, based on the Retail Expenditure Survey 2011/12. The total available expenditure for convenience goods within each of the catchments ranges between £202.5m and £223.17 m. The total available expenditure within catchments for comparison goods ranges between £198.93 m and £219.24m.

The Department has then identified the nature and extent of the retail offer within Derry/Londonderry from a variety of sources including the various Retail Impact Assessments (RIA) submitted in support of the retail applications and provided existing convenience and comparison floorspace for the catchment areas.

### **Derry/Londonderry City Centre**

It is accepted that Derry/Londonderry is the main shopping destination in the North West as identified in the Regional Development Strategy (RDS) 2035. The Department estimates that there is a net convenience floorspace of 37,655 sq m and a net comparison floorspace of 84,750 sq m. This however does not square up with the claim that only 7.78% of the land use is occupied by convenience shopping, which seems to be remarkably low for the main shopping destination and suggests the city centre requires better protection in planning policy terms. The comparable figure for comparison shopping is 18.4% but no figure for services is provided.

The Department estimates that the overall vacancy rate for Derry/Londonderry city centre is 16.55%, with 14.55% of this being retail vacancies (Table 6). This compares with an average vacancy rate of 18.5% for the whole of Northern Ireland July 2012 (British Retail Consortium). This estimate does not accord with NIIRTA's own survey of a number of selected streets in Derry city centre in April 2012. Derry City Traders identified over 100 vacant retail properties within Carlisle Road (41%), Duke Street (50%) and Waterloo Place (25%), which equated with an overall vacancy rate of 23.25%, which is higher than the Northern Ireland average.

NIIRTA's clear assessment of Derry/Londonderry city centre is that the vacancy rate is actually higher than the Northern Ireland average and the city centre has a lower than expected convenience shopping floorspace than would normally be expected within this primary shopping destination. In addition as a result of recent decisions in respect of approvals for major convenience shopping outside the city centre the

vacancy rate has risen with many small shops closing as they are unable to compete with the large out of city shopping centres.

The Department also claim that there is little evidence to suggest linked trips between the city centre convenience stores and the rest of the city centre, but offer no quantitative evidence to back this up. The Department's own land use survey indicated that only 26.26% of the city centre land use was occupied by convenience and comparison retail space. The remaining 73.74% was occupied by services, education and industry which suggested that many employees working in the city centre are likely to shop and carry out other linked services in the city centre.

### **District Centres**

The Department has confirmed that there are four District Centres, whose primary role is the provision of locally accessible convenience goods.

Lisnagelvin is the largest district centre in Derry/Londonderry and the only district centre on Waterside. It consists of the main shopping centre and a smaller parade of shops, where the main convenience anchor stores are Tesco and Supervalu. This provides a degree of competition and an opportunity for linked trips and includes some comparison retailing.

The other three district centres of Northside, Rath Mor and Springtown each have convenience anchor stores of Supervalu, Costcutter and Dunnes Stores and provide an important community function in addition to the primary retail offer. Lisnagelvin (A/2007/0415/F) and Northside (2010/0337/F) district centres have been granted recent approvals for redevelopment; however there has been no commencement of the development, nor is it likely until the other applications are determined.

### **Local Centres**

The Department has confirmed that Crescent Link Retail Park is a retail warehousing development. However it does also include a Marks & Spencer Simply Food and a Tesco Express and an adjacent Costcutter which provide a top up convenience function for local residents and those working in the locality.

The Department has assessed that the Buncrana Road has an existing local centre at Whitehouse anchored by a NISA store and other shops. However there are no other local centres on the Buncrana Road as the Springtown District Centre is so close to the Buncrana Road/Templemore junction that it provides that function.

There are some six new local centres identified in the development plan which include one on the east side of Buncrana Road, two on the west side of Buncrana Road, Lower Galliagh Road and Ballyarnett to serve large areas of proposed residential development. The final local centre is already existing at Crescent Link as referred to above. To consider any further centres on the Buncrana Road will simply result in retail development all the way along the Buncrana Road to the city centre which is quite close to Strand Road.

The remainder of the other local centres of Culmore, New Buildings, Strathfoyle, Claudy, Eglinton and Greysteel are assessed as providing primarily a top up shopping function.

## **Other Centres**

The Department has outlined that there are a number of other centres whose role and function are of relevance to this study. These include Strabane which is a major convenience shopping destination and also has a range of comparison shopping. Dungiven however is assessed as performing as a main food shopping destination for a small number of people, but has primarily a top-up shopping function.

In addition the Department identifies a number of centres in Donegal (ROI) which are important to the study, but these throw up apparent contradictions. These include Letterkenny, the main retail centre for Donegal where on one hand the Department indicates that a number of convenience retailers have been affected by convenience leakage, whereas the shift to retail warehousing has stemmed the comparison leakage to Derry/Londonderry. This requires to be clarified as it appears to be one of the quirks thrown up by such a small sample of interviewees.

Other Donegal towns, such as Buncrana does not have the range and quantity of retail facilities that would be expected of a town of its size. The majority are convenience retailers and there is little comparison shopping due to the proximity and influence of Derry/Londonderry. The remaining centres, which include Muff, Carndonagh and Moville, provide mainly convenience retailers with limited comparison retailing.

## **Turnover of Centres**

Following examination of the retail offer at the various centres the Department estimated the potential turnovers of those centres most likely to be affected by the various foodstore proposals. These were derived from a variety of sources including the Mintel Retail Rankings, the submitted Retail Impact Assessments (RIA) submitted in support of applications, shopper surveys and observational site visits. It is noted that there are no details of the sampling method or how these shopper surveys were focus tested, nor the weight given to them in the Department's assessment.

It is evident that the Department's strategy in their assessment of the estimated potential turnover of surrounding centres is to boost the performance of all District Centres as they will be most directly affected by the Tesco Buncrana Road and ASDA, Crescent Link proposals. The logic being followed is that if the estimated performance and turnover of these District Centres is boosted then the impact of the anticipated approvals for Tesco, Buncrana Road and ASDA, Crescent Link will be so much less and these District Centres will still remain viable.

Whilst NIIRTA agrees with the Department that the Lisnagelvin Tesco store is clearly overtrading, but it considers that the Department's assessment is over-optimistic and that the estimated turnover is excessive. It is accepted that the Supervalu store adds an element of competition and choice for customers. However NIIRTA considers that the sales density at Tesco Lisnagelvin should be similar to Tesco Quayside which would result in an overall turnover closer to £40m rather than £48.63m as estimated.

On the other hand the Department has assessed the Dunnes Stores outlet in Springtown District Centre and concluded that it is trading at a higher level than claimed in the RIA, which accompanied their application, without adequate justification. NIIRTA on the other hand is of the view that the Dunnes Stores outlet is trading below the company average as it requires modernisation and upgrading which has been delayed due to the "black cloud" of uncertainty of the Tesco application over-hanging Buncrana Road since 2004. The effect of the Tesco

proposal has been to lead to a significant loss of investment in the existing Springtown district centre. The turnover of the Dunnes Store outlet is closer to £10m than the £12.56m estimated.

The other interesting fact is that the Department does not include any assessment of the turnover of the Supervalu store at Northside District Centre which is also very close to the proposed Tesco Buncrana Road store. The estimated turnover for the Supervalu store is again higher than the company average, with no justification or rationale provided. This District Centre has an approval for redevelopment, but again this has not yet been taken up. The Tesco application at Buncrana Road has acted as a deterrent over this proposal for many years and has led to a significant loss of investment in the Northside District Centre, which will be directly affected by approval of the Tesco store.

On the other hand the Department focuses its attention on the Costcutter store at the Rath Mor District Centre and the Lidl store at Buncrana Road where it is claimed that they have a higher than average turnover. The intention is to pave the way for the Tesco and ASDA approvals by reducing the likely impact that can then be claimed.

### **Shopper Surveys**

The Department carried out minimal shopper surveys at locations around the city in order to make judgements as to the amount of trade that will be likely to be diverted from existing centres to proposals that are approved in Derry/Londonderry. In addition shopper surveys were carried out in Strabane and County Donegal.

The Department does not provide any details of the customer surveys, the methodology used, or where the surveys were carried out and how much weight was given to the results. A significant sample (5-10%) of the overall customers within a town or centre will be required to ensure meaningful results; otherwise the results will be biased to producing the outcome desired. The interview technique will require to be focus tested to ensure consistent interpretation of answers and meaningful results. The usual method is to carry out rigorous training of staff before any interviews take place to ensure a consistent standard.

There is no indication of the location of the interviews, the time of the day or the days on which they were carried out as the origin of the customers may vary depending on the day or evening chosen. There is no indication if the surveys in Derry/Londonderry city centre were carried out for example in Waterloo Place, Guildhall Square, Strand Road or within the Foyle side Centre as this will have a huge bearing upon the results. In the case of the Donegal surveys such as Letterkenny there is no indication where the 37 interviews took place or how the interviewees were chosen.

It is clear however that the surveys involved a very small sample of customers, ranging from just 20 interviews in some of the District Centres to a maximum of 76 interviews in Derry City Centre. The interviews at each centre appear to have been carried out on one day and at a certain time, which distorts the results and validity of the conclusions.

In NIIRTA's view the shopper surveys display a considerable number of flaws which substantially undermine the validity of any of the results. These surveys cannot now be corrected after the event. The only way to overcome the in-built flaws is by repeating the shopper surveys based on the accepted quantitative sampling techniques. Unless this is done these results will be challenged.

NIIRTA would also point out that in addition to the significant flaws in the sampling technique of the shopper surveys, the results of these flawed surveys do not even add up to 100% and appear to be both inaccurate and a rushed compilation.

For example the Derry/Londonderry city centre shopper survey includes a question on comparison shopping (Question 9). The results of this are reproduced in Appendix B and reveal that the majority of respondents carried out comparison shopping in Derry/Londonderry (93.42%), Limavady (1.32%), online (2.63%) and unspecified (2.63%). However these results bear no resemblance to the summary of the same question in paragraph 3 of page 30, where it is claimed that comparison shopping was carried out by the majority of respondents in Derry/Londonderry (86%), Belfast (4%), Moville(1%) and Online (3%), which only totals 94%. This simply undermines the report, reinforces the flawed results and demonstrates that little or no weight can be attached to this Retail Study.

It is noted that the Department is very anxious to ensure that everyone has heard the message in relation to the Rath Mor District Centre. *"It benefits from a high level of support from the local community"* as outlined on page15. This same message is repeated again under the shopper surveys on page 31 to ensure that the status of Rath Mor District Centre is recognised and the impact on it will be less significant.

### **County Donegal Shopper Surveys**

The Department has continued to make the same mistakes with the carrying out of shopper surveys in County Donegal as they did in Derry/Londonderry. The number of interviews carried out is very small and a proper sampling and interview technique had not been adopted regarding a variation of days, time, location and questions. The results are therefore flawed and have a degree of in-built bias which cannot be eradicated, without a fresh survey being carried out.

The results of the small sample of Letterkenny shoppers survey (37) are fairly predictable, revealing that a third carry out their main food shopping in Letterkenny(32%), Dunnes Letterkenny (30%), ASDA Strabane (27%) and Sainsbury's Strand Road (11%). This is hardly surprising given that 32% of respondents work in Derry/Londonderry.

The Inishowen Peninsula shopper survey has an even smaller sample with only 22 shoppers interviewed in Bunrana, 10 in Moville and 10 in Cardonagh. These samples are so small that they are virtually meaningless and a valid interpretation cannot be based upon them. The Department's interpretation of the results produce a headline claim that 29% from Inishowen Peninsula shop in Tesco Lisnagelvin and adds weight to the fact that Tesco Lisnagelvin is over trading. This claim is basically flawed, as it is based upon very low numbers, which are not a significant sample. A total of 5 people from Bunrana, 5 from Moville and 2 from Cardonagh have produced this claimed result and in any event it is unsurprising as they all appear to work in Derry/Londonderry. This also contradicts the earlier lack of linked trips claim.

### **Strabane Shopper Surveys**

The Department's headline claim is that many people from Derry/Londonderry and County Donegal were travelling to ASDA Strabane to carry out their main food shopping. They go on to claim in paragraph 3 page 36 that 21% travelled from Derry/Londonderry to Strabane for their main food shopping. This is contradicted by a 23% claim for the same shoppers from Derry/Londonderry to Strabane in

paragraph 1 of page 59, which undermines the credibility of the survey and the Departmental figures. It also demonstrates the haste to prepare this Review.

The claims in relation to the Strabane shopper surveys relate to Question 3 to identify where the shoppers have travelled from for their main shopping. The figures in Appendix B show that 14.29% travelled from Letterkenny, 17.14% from Derry/Londonderry and only 22.86% from Strabane. These are based on very small samples of only 5, 6 and 8 customers respectively out of a total of 35 interviews.

These figures produced from the questionnaires do not accord with the summary figures produced in paragraph 3 of page 36. The Department claims that either 21% or 23% (depending on whether you choose either page 36 of 59), travel to Strabane from Derry/Londonderry to do their main shopping. They further claim that only 3.5% travel from Strabane, which appears highly doubtful. The result is that these figures are totally contradictory, depending on which section of the Retail Study they are taken from and the claims of the Department cannot be substantiated.

The fundamental problem is that the sample of interviews used is so small that any discrepancy is exaggerated and therefore the figures are unreliable. The suggestion that only 3.5% of customers to Strabane are from Strabane is unbelievable whereas the questionnaire suggests some 22.86% are from Strabane. NIIRTA would contend that nothing can be interpreted from these shopper surveys as they are so fundamentally flawed. The Department should not have rushed to publish them without editing and checking them before issue.

### **Other factors influencing trade draw**

The Department claims that the Weekday Annual Average Daily Traffic data has been derived from the Roads Service Traffic Census Report (2005) and projected forward to a design year of 2015 to assist in the assessment of each of the applications. They go on to claim that the average daily traffic flow on Buncrana Road grows from 20,602 at Whitehouse to 27,144 at Branch Road roundabout.

The Department assumes that the proposals on Buncrana Road (Tesco) will *“reap the benefits from much of this passing trade. Similarly the proposals at Crescent Link can enjoy some 23,330 cars passing nearby the sites daily”*. This factor appears to have been introduced to post rationalise the two decisions at Tesco Buncrana Road and ASDA Crescent Link, which the Department has already made.

However the Department's logic is again flawed as it does not take into account the construction of the Skeoge Road roundabout near Whitehouse which was only opened after the 2005 Roads Service census and does not take into account the redistribution of the traffic on Buncrana Road and local networks. This link road provides a much quicker link to the Foyle Bridge and Crescent Link Road than going down the Buncrana Road via the city centre and Craigavon Bridge. The figures used by the Department will not grow to the extent claimed.

The second factor in relation to the ASDA proposal is that the additional traffic passing along Crescent Link Road will also be applicable to the Lisnagelvin District Centre which is already existing, the Caw (Gransha) proposal, the Drumahoe proposal, the Rosstown proposal and the Sainsbury proposal at Kilfennan Link roundabout. There is no real advantage to the ASDA proposal other than the Department has already made its decision and is trying to justify it.

The Department then turns to public transport to try to justify the Crescent Link (ASDA ) proposal and the Buncrana Road (Tesco) proposal on the basis that not everyone has access to a private car. This is only 63% in Derry/Londonderry compared to 73% average for Northern Ireland. There is however again a fundamental flaw in the Department's logic as very few shoppers will use public transport to carry a weekly shop, due to the infrequency of the services, the need for multiple bus trips, whilst carrying heavy shopping.

However the Department's logic appears to be to try and advance a case for Buncrana Road (Tesco) and Crescent Link (ASDA) using bus accessibility. This is nonsense as bus services weave in and out of estates to maximise the number of fare paying passengers but the length of time is extended significantly, which defeats the purpose of weekly shoppers using this mode. On this basis the Department appears to have rejected the Drumahoe proposal as it is not easily accessed by bus

The Department appears to accept this on page 45 where it states that, *"Given the main food shopping nature of the majority of the proposals, it is unlikely that residents will be willing to embark on multiple bus journeys in order to undertake a large food shop"*. On the other hand shoppers from the ROI where average journeys can be up to an hour are unlikely to use this mode even for Buncrana Road as claimed by the Department, as all services will link to the city centre

A survey of any shopping centre in any town in Northern Ireland will reveal that the most used method of transport for a weekly shop for non car owners is that of private taxis, rather than any public transport even if it is on a circular route. The cost of a private taxi is so much less in NI than in the rest of the United Kingdom that this transport mode is cost effective for shoppers who have no access to a private car.

Significantly the Department spends less time assessing the use of taxis by shoppers, which in NIIRTA's view would be a more relevant mode for those carrying out weekly convenience shopping.

### **Committed Developments**

NIIRTA accepts that there are several extant approvals within the catchment area which will form part of the cumulative retail impact of the various foodstore proposals.

The Buncrana Road (Tesco) site was part of Faustina retail warehouse park which was to include six retail warehouses in addition to the DIY store on the site of the former Fruit of the Loom factory. The Department was warned by Roger Tym back in 2002 in its report on Retailing in Northern Ireland that there was an oversupply of retail warehousing and an embargo on further retail warehousing should be imposed. The Department ignored this recommendation and approved Faustina Retail Park.

The main DIY unit has been built and subdivided in two, but the remaining six retail warehouse units and non-food unit have not yet been built as there is still an over-supply of retail warehousing. This land should have been protected for industrial use under PPS4 and there is no need for either retail warehousing nor the proposed foodstore at this location as there is more than adequate convenience retailing provided at the two district centres on either side of Buncrana Road. The committed retail warehousing at this location does not extend to a convenience superstore.

The remaining committed developments are all located within the existing District Centres of Northside, Lisnagelvin and Springtown. Northside has some 2,670 sq metres existing floorspace and 3,717 sq m floorspace approved to be redeveloped.

Lisnagelvin has some 7,418 sq m existing floorspace and some 14,669 sq m floorspace has been approved for the redevelopment of the centre. Springtown district centre has permission for the partial demolition of a former factory and subdivision into two retail warehouse units amounting to 3,232 sq m.

## **Conclusions**

NIIRTA has opposed each of the ten retail applications in Derry/Londonderry and continues to do so as there is no need for any more out of centre retail approvals.

NIIRTA therefore has challenged this Retail Study report as being rushed, inaccurate and riddled with mistakes that undermine its credibility. The sampling method, the small scale of the sample and the flawed shopper surveys have resulted in conclusions that cannot be relied upon and undermine the whole report. Many of the conclusions and much of the assessment is littered with apparent contradictions in an attempt to justify the pre-determined outcome.

It is clear that the Departmental conclusions have been influenced by its prior decision to approve both the Tesco Buncrana Road site and the ASDA Crescent Link site, which was concluded back in February 2012 when the Department withdrew from the proposed public inquiry into the Buncrana Road site. This post rationalisation has been prepared during the last six months by working backwards from these decisions and preparing a justification for such outcomes to try and mitigate against multiple Judicial Reviews.

The Retail Study has been written with this object in mind and has resulted in the introduction of many irrelevant factors such as the lengthy examination of bus services, the lack of balance in the assessment and the partial nature of the context provided. The result of the report is a foregone conclusion that the Tesco Buncrana Road site and the ASDA Crescent Link site will be approved and Derry/Londonderry city centre convenience shopping will be the loser with an even higher vacancy rate.

Yours sincerely

**Glyn Roberts**  
**Chief Executive**

cc. Mary McIntyre - Director of Strategic Planning  
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Brona Shepherd