



**Northfleet  
Harbourside**

## **Retail and Leisure Statement**

# NORTHFLEET HARBOURSIDE

## RETAIL AND LEISURE STATEMENT

Gravesend Borough Council



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# 1.0

# INTRODUCTION

Gravesham Borough Council

# 1.0 INTRODUCTION

1.1 This Retail and Leisure Statement (“the Statement”) has been prepared by Montagu Evans LLP in support of an application for outline planning permission (“the Application” or “the Application Proposals”) submitted to Gravesham Borough Council (“GBC” or “the Council”) on behalf of Northfleet Central 1 Limited (“the Applicant”), for the redevelopment of the site at Stonebridge Road referred to as “Northfleet Harbourside” (“the Site” or “the Application Site”).

1.2 The description of development for the Application is as follows:

*“Outline planning application with all matters reserved, except for the primary means of access, for a mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation / remediation works, and the development of residential units (Use Class C3), Use Class E floorspace including floorspace for retail, food and beverage, office floorspace and flexible Class E floorspace, floorspace for a new multi-use stadium with associated business and leisure facilities, floorspace for a hotel (Use Class C1), floorspace for community uses (Use Class F2) and other sui generis uses, delivery of open space and the realignment of the A226 Galley Hill Road / Stonebridge Road with hard / soft landscaping, car and cycle parking, highways works, infrastructure works, ancillary and associated works.”*

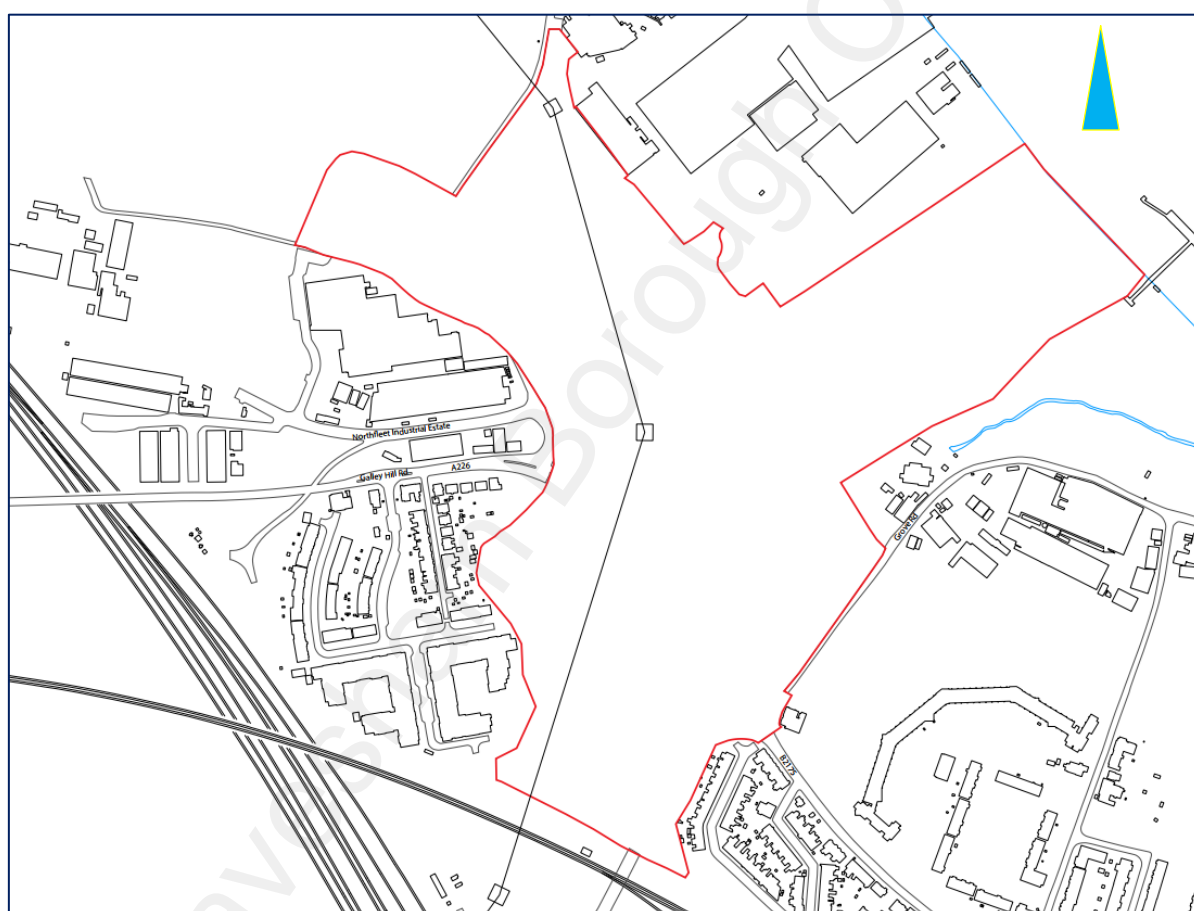
1.3 The Application reserves all matters for later approval, with the exception of means of access into and out of the Site from the highway network. All remaining matters relating to scale, layout, appearance and landscaping will be reserved and subject to reserved matters applications at a later date.

1.4 A full explanation of the Proposed Development is contained within the Planning Statement, however in summary the Proposed Development will deliver the following:

- Site clearance, including demolition and removal of the existing industrial uses/buildings on-site and remediation of brownfield land;
- Realignment of the A226 Galley Hill Road / Stonebridge Road;
- Provision of hard and soft landscaping delivering new areas of public realm;
- Car and cycle parking provision;
- Highway works
- Construction of a new multi-use stadium (with associated facilities) (Sui Generis Use) with up to 8,000 seats and comprising up to 18,000 sqm (GEA);
- New buildings ranging between 2 and 20 storeys to deliver the following:
  - Up to 3,500 residential units (Use Class C3);
  - Up to 22,500 sqm (GEA) retail floorspace (Use Class E(a));
  - Up to 9,500 sqm (GEA) food and beverage / drinking establishment uses (Use Class E(b) / Sui Generis);
  - Up to 1,100 sqm (GEA) local services uses (Use Class E(c) / Sui Generis);

- Up to 1,200 sqm (GEA) indoor sport, recreation and fitness uses (Use Class E(d));
- Up to 1,500 sqm (GEA) healthcare space (Use Class E(e)
- Up to 1,500 sqm (GEA) creche or nursery uses (Use Class E(f));
- Up to 18,000 sqm (GEA) office use (Use Class E(g));
- Up to 4,000 sqm (GEA) local community use (Use Class F2)); and
- Up to 20,000 sqm (GEA) hotel use (Use Class C1

1.5 An extract from the Site Location Plan is provided at **Figure 1.1** below.



*Figure 1.1 Northfleet Harbourside Site Location Plan (Not to Scale)*

- 1.6 The Applicant is Northfleet Central 1 Limited, which is working in partnership with Ebbsfleet United Football Club to deliver the scheme. This partnership approach will ensure that the football club remains at the heart of the Northfleet community and will have a viable future through the provision of new sporting facilities that support growth and promotion.
- 1.7 A key element of the masterplan is the provision of a diverse and wide-ranging programme of retail accommodation. The Marketplace in particular focuses on a 'village like' retail experience with an open-air retail environment. The units will range in size from around 100 sq. m up to circa 500 sq. m. It is anticipated that the retail will be comparison-led, although there will be elements of small-scale convenience retail to support residents and visitors to the Site.

- 1.8 The proposed investment in the football stadium will allow Ebbsfleet United to play from the venue with a sustainable and self-sufficient future whilst also allowing for a reinvestment of funds and much needed facilities into the wider community of Northfleet.
- 1.9 This Retail and Leisure Statement provides an assessment against the relevant planning policy with regards to the proposed retail and food and beverage elements of the Proposed Development. It identifies the key retail policies at a national and local level, which are relevant to the consideration of the Application, and provides an assessment of the proposals against these key policies. The acceptability of the other commercial uses, including the proposed hotel and office space, is addressed in the accompanying Planning Statement.
- 1.10 The scope of this document has been discussed with Planning Officers at Gravesham Borough Council at the pre-application stage. A Retail Scoping Report was submitted to the Council on 21 July 2022, which set out the main factors relating to the retail and leisure uses which would be addressed in this Statement.
- 1.11 The remainder of the Statement is structured as follows:
- 2.0 The Site Context and Proposed Development** – Considers the context of the Site within the wider retail landscape, and provides an overview of the retail and leisure uses proposed by the application;
  - 3.0 Relevant Planning Policy** – This section identifies the relevant retail and leisure planning policy at a national and local level to be addressed by the Application;
  - 4.0 Background Information** – This sets out the background information to be used to inform the retail assessment and details of the Household Survey which was undertaken by the Applicant to understand current shopping patterns;
  - 5.0 The Sequential Test** – This section considers the application of the sequential test (in respect of the retail floorspace) and identifies whether there are any more centrally located sites available;
  - 6.0 The Retail Impact Assessment** – This section analyses the potential impact of the retail floorspace on the allocated centres within the wider catchment area.
  - 7.0 The Leisure Impact Assessment** – This section analyses the potential impact of the proposed food and beverage floorspace on existing centres;
  - 8.0 Summary and Conclusions** – This section summarises the key issues considered in the Report and provides the conclusions of the assessment.
- 1.12 This Statement concludes that the provision of the proposed retail and food and beverage uses, associated with the Proposed Development, is fully in line with national and local policy in terms of impact and the sequential test, and should therefore be considered favourably.

# 2.0 THE PROPOSED DEVELOPMENT AND SITE CONTEXT

- 2.1 The description of the Site and Proposed Development are set out in length in the accompanying Planning Statement. However, for the purposes of this Statement, it is useful to set out the context of the Site in terms of its relationship with surrounding centres.
- 2.2 The application seeks permission for a maximum gross floorspace cap of 22,500 sq. m (GEA) for retail floorspace and up to 9,500 sq. m (GEA) of food and beverage (F&B) leisure uses within Class E. The majority of the retail floorspace will be located within the Marketplace Neighbourhood, with a small element falling within the Stadium Neighbourhood. The proposed F&B floorspace will be spread across the Site, serving both the residents and visitors to the football stadium and Marketplace.
- 2.3 In addition, the application proposes up to 1,100 sq. m of 'local services', with the primary purpose being to support both the existing and introduced residents and employees within the immediate area. It is anticipated that some of these local services *could* include small-scale retail uses within Class E(a), including convenience floorspace. Therefore, for the purposes of this Retail and Leisure Statement, we have assumed that up to 50% i.e., 550 sq. m of the Local Services floorspace could be used for retail sales, in addition to the 25,500 sq. m of floorspace.
- 2.4 **Figures 2.1 and 2.2** below show the general layout of the development and how it fits into the wider area, including the 'Neighbourhood Areas' to be created within the Site



Figure 2.1 – Proposed Site Layout

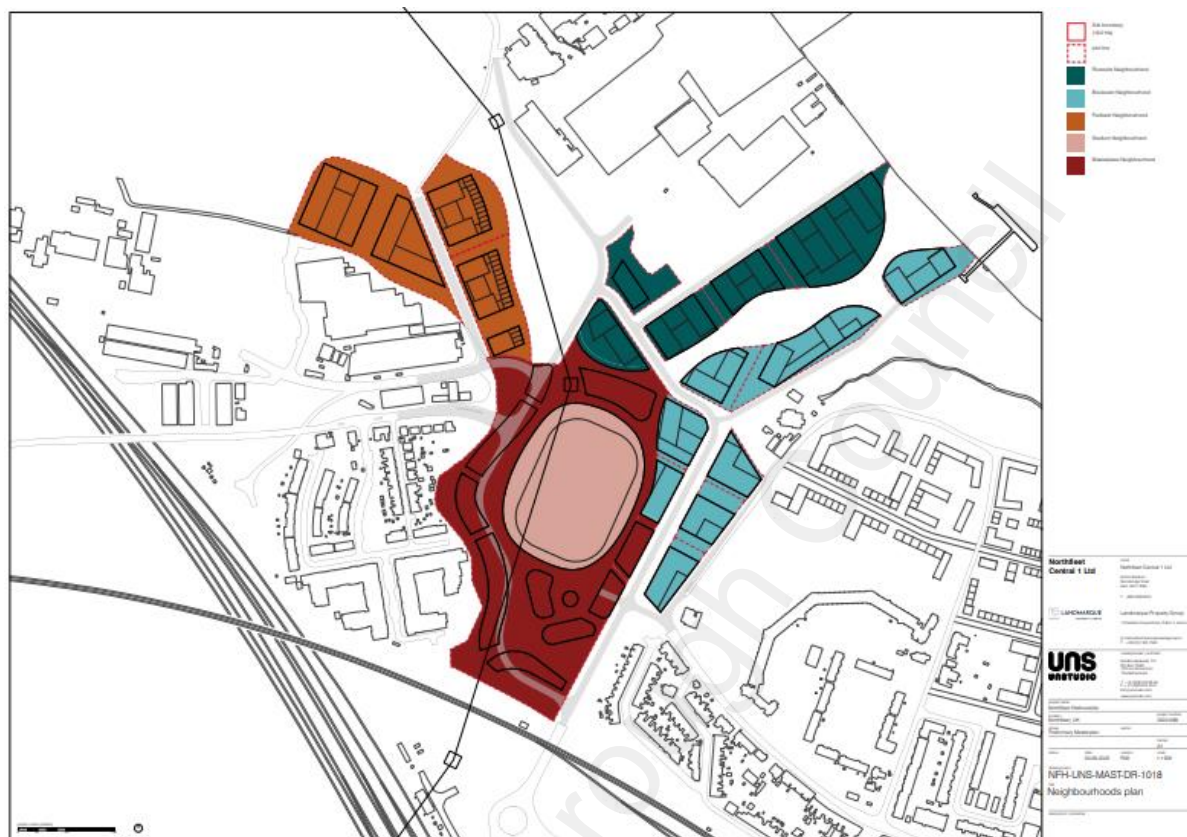


Figure 2.2 – Proposed Neighbourhood Areas

## THE PROPOSED RETAIL AND F&B OFFER

- 2.5 The new stadium to house Ebbsfleet United Football Club lies at the heart of the Proposed Development, with the capability of hosting additional cultural, music and community events. The proposed retail floorspace is a key part of the overall masterplan, allowing the delivery of the stadium to come forward. It will provide a diverse and wide-range of retail accommodation.
- 2.6 The proposed retail and F&B offer is crucial to the development as a whole. The level of investment to deliver a step-change in the quality of the stadium can only be achieved through the introduction of supporting town centre uses (e.g. hotel, retail and food & beverage) alongside residential development of scale commensurate with that proposed. Not only does this level of development allow for the funding of the new stadium (delivered by adjusting its location and moving the A226), but it also introduces a critical mass of visitors that will support the non-football functions of the stadium which provide other sources of income for the football club.
- 2.7 The majority of the retail floorspace (up to 18,000 sq. GEA) will be located within the Marketplace Neighbourhood, focussed along a pedestrianised walkway on the western side of the new stadium, known as Harbourside Walk. It is anticipated that the Marketplace Neighbourhood will provide a high-quality retail experience that works closely with the leisure activities of the new stadium and will act as a destination for both visitors and residents, with activity all year round. The Marketplace in particular focuses on a 'village like' retail experience with an open-air retail environment.
- 2.8 The units will typically be small in scale, ranging in size from around 100 sq. m, up to circa 500 sq. m in size. It is anticipated that the retail will be comparison-led, although there will be elements of small-scale convenience retail to support the day to day needs of those living and working at the Site. The retail provision in this area will be predominately of a 'high-street'

format, to complement the wider uses proposed at the Site, and the existing retail provision currently found within Gravesham Borough.

- 2.9 Up to 4,000 sq. m of retail floorspace will also be located within the Stadium Neighbourhood, alongside a variety of other uses linked to the stadium itself, including conference facilities and health and fitness uses, as well as the stadium and football pitch. The nature of the retail floorspace within the Stadium Neighbourhood will broadly accord with that contained within the Marketplace Neighbourhood, comprising predominantly comparison-led uses, contained in small-scale units.
- 2.10 The proposed F&B offer will be spread across the Site in several of the Neighbourhoods. The main concentration of the F&B will be in the Boulevard Neighbourhood, which will accommodate the proposed office uses, up to 950 residential units, as well as local services, including medical and health. The F&B offer in this area is likely to focus on meeting the day-to-day needs of those working and living within the Proposed Development. Additional pockets of F&B will be provided across the Site, including in the Riverside Neighbourhood fronting the River Thames, the Marketplace Neighbourhood, as well as the Stadium Neighbourhood. The F&B offer has not been designed to act as a destination in its own right, rather it is intended to support the other uses being provided.
- 2.11 In particular, the Masterplan for the Site envisages:
- Small / medium scale food and beverage units centred around the entrance to the masterplan and the Stadium;
  - Food and beverage units along the ground floor of the Boulevard and Riverside Neighbourhoods;
  - Double height retail units around the boundary of the Marketplace Neighbourhood and western Stadium area forming a retail street around the central stadium;
  - Larger food and beverage units at the ground floor of the residential, hotel and office spaces along the Boulevard Neighbourhood;
  - Unique waterfront food and beverage experience at the top floor of the buildings directly adjacent to the Thames River within the Riverside Neighbourhood; and
  - Smaller food and beverage units distributed within the public realm spaces

## THE WIDER SITE CONTEXT

- 2.12 The Site is situated within the Borough of Gravesham, and adjacent to the Ebbsfleet Development Corporation's administrative boundary both in both easterly and westerly directions. It is also close to the border with the Borough of Dartford. The Site is located 'out-of-centre' in policy terms. An overview of the site location in the context of the wider area is shown in **Figure 2.3** below.

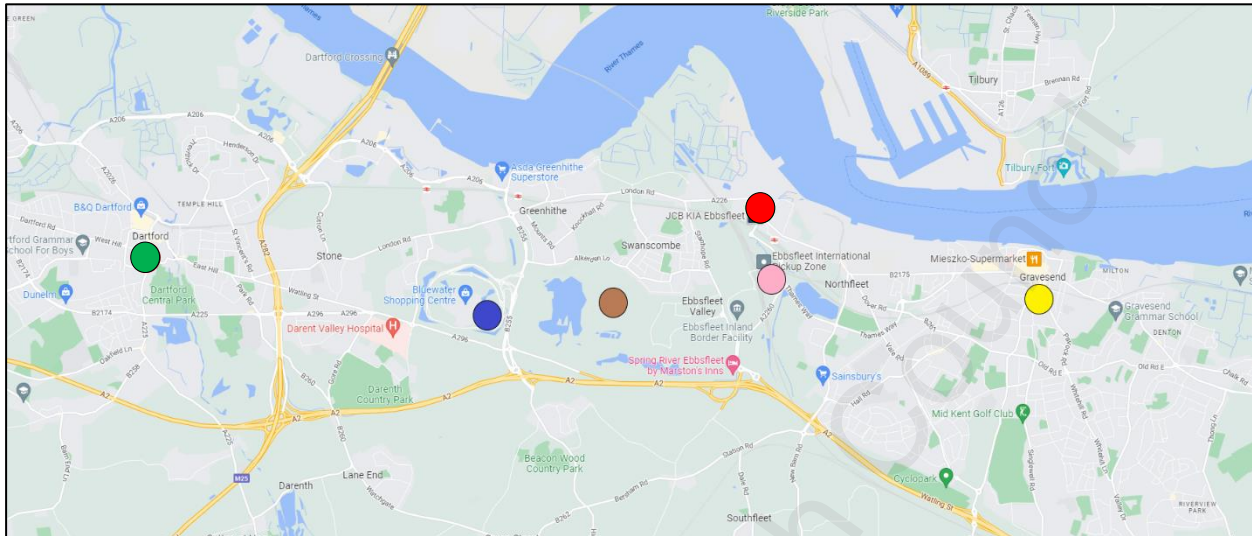


Figure 2.3 – Wider Site Context showing The Application Site (Red), Gravesend TC (Yellow), Dartford TC (Green), Bluewater SC (Blue), Ebbsfleet Central (Pink), Eastern Quarry (Brown)

- 2.13 The Site is located within the **Northfleet Embankment and Swanscombe Peninsula East Opportunity Area**. Paragraph 4.4.1 of the Gravesend Local Plan Core Strategy (2014) identifies the area as presenting clear opportunities to make more efficient use of land, facilitate river related activity, accommodate new development and secure environmental improvement as part of the wider regeneration of the area.
- 2.14 Policy CS03 of the Core Strategy refers specifically to the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area, stating that the area comprises a “*substantial opportunity for major riverside regeneration in Gravesend. Development will bring significant benefits to existing adjoining residential communities and the Borough as a whole through the delivery of new housing and jobs whilst achieving environmental improvement, especially in air quality, and a high standard of design*”.
- 2.15 Core Strategy Policy CS03 goes on to set out sub-areas within the Opportunity Area. As per the policy and accompanying Core Strategy Figure 4, the Site falls predominantly within sub-area 1.3 – Grove Road and Lower Ebbsfleet Area, and partially within sub-area 1.2 Swanscombe Peninsula East Riverside Industrial Area.
- 2.16 Sub area 1.3 of this Opportunity Area has been divided in to two, with land to the south of the wharf identified as a “key site” for development, and the remainder of the area included for redevelopment and growth. It is clear that the Council has regeneration ambitions for the Application Site by virtue of its inclusion within the wider Opportunity Area. Policy CS03 identifies the OA as a “substantial opportunity for major riverside regeneration in Gravesend. Development will bring significant benefits to existing adjoining residential communities and the Borough as a whole through the delivery of new housing and jobs whilst achieving environmental improvement, especially in air quality, and a high standard of design”. The policy goes on to set out that the Council will support the regeneration for residential and employment uses of the Grove Road and Lower Ebbsfleet Area (sub-area 1.3 which includes Robins Wharf, and the Key Site on Grove Road) taking into account the ground conditions and existing uses.
- 2.17 The Proposed Development adheres to the overarching goals of the sub area 1.3, delivering new residential and commercial uses in a comprehensive manner. It will deliver significant improvements to public realm and remove the impact of heavy commercial traffic through the diversion of the A226 and existing uses which have the ability to impact upon adjacent sites through noise and air quality issues. The Proposed Development therefore accords with the objectives and requirements of Policy CS03 in this regard.

## EXISTING / PROPOSED CENTRES AND RETAIL PROVISION

- 2.18 In this section we set out the existing and proposed centres and retail destination which the Proposed Development *could* have a *significant* impact upon.
- 2.19 The Site is adjacent to the Ebbsfleet Development Corporation boundary, which promotes the comprehensive regeneration of a number of sites both within the Boroughs of Dartford and Gravesham. Of particular note are Eastern Quarry and Ebbsfleet Green as well as Ebbsfleet Central, including the Ebbsfleet (Gravesham) Opportunity Area.
- 2.20 Ebbsfleet Central lies in the centre of Ebbsfleet River valley, with Ebbsfleet International Station forming a central focus for the area. Surrounding the station are a number of development parcels including surface parking and filled areas, some of which is used for open space. The Springhead Quarter lies in the south eastern segment of the Ebbsfleet, within Gravesham, and has already been subject to extensive residential development.
- 2.21 The role of Ebbsfleet Central is to create an urban heart for the Ebbsfleet that is complementary to the offer provided at Dartford and Gravesend Town Centres and Bluewater Regional Shopping Centre. Rather than creating a retail destination in its own right, the Ebbsfleet Implementation Framework document, prepared by the Ebbsfleet Development Corporation in 2017, envisages a network of local centres and mixed use commercial and community use areas. It is envisaged that up to circa 18,400 sq. m of retail uses could be provided within this area to support the 3,384 new dwellings, 455,000 sq. m of office space, and other leisure uses such as hotels. The Dartford and Ebbsfleet Retail and Leisure Study (2021) confirms that it is assumed all the retail floorspace will be open and trading by 2036.
- 2.22 An outline planning application was submitted in September 2022 for a mixed-use development at Ebbsfleet Central to include approximately 21,500 sq. m of gross comparison retail floorspace within Class E(a) (16,125 sq. m net) and 4,031 sq. m net of convenience goods floorspace (LPA Ref. EDC/22/0168). The main purpose of the retail is to support the wider mixed-use scheme, which includes up to 250,000 sq. m GIA of residential floorspace, although the application does recognise that some trade will be diverted from the surrounding network of centres, including Gravesend, Dartford and Bluewater Shopping Centre. The parameter plans submitted in support of the application show the proposed retail floorspace spread out across the site.
- 2.23 Eastern Quarry, a former chalk quarry, includes areas of landscape and waterscape and initial infrastructure to support development. The site is broadly split into three village areas, and residential development has already started to be developed on the site. Located in proximity to new neighbourhoods and along the transport spine, four new local centres will be located at Castle Hill, Alkerden, Western Cross and Ebbsfleet Green. Of these, Alkerden Centre will be of a size and critical mass required to attract commercial uses and services that meet the needs of residents, as well as being closely integrated with a new education campus. The Ebbsfleet Implementation Framework identifies that the site as a whole could deliver up to 16,900 sq. m of Class E(a) retail floorspace, predominantly focused in the Alkerden area, with pockets of local retail provided elsewhere.
- 2.24 The Dartford and Ebbsfleet Retail and Leisure Study (2021) ('the 2021 Retail Study') estimates retail floorspace planned for the three villages could total 5,850 sq. m gross, of which just 2,576 sq. m gross (1,932 sqm net) would be used for the sale of comparison goods. It is clear from the Framework that the floorspace proposed in the Eastern Quarry will support the local need created by the proposed residential and education uses, rather than acting as a destination in its own right, drawing trade from a wide catchment. Its impact on the existing retail provision in the area is therefore likely to be limited. The application for Ebbsfleet Central assumes Eastern Quarry as a commitment, with a comparison goods turnover of £9.3m from the survey area of the development and a convenience goods turnover of £18.3m.
- 2.25 The closest allocated centre to the application Site is The Hive, located approximately 0.6 km to the south east. The Hive comprises a designated Local Centre within the Gravesham Local Plan Core Strategy (2014). The Centre was originally constructed as part of the redevelopment of Northfleet High Street in the 1960s and is set back from road around a public

square at base of block of flats. The Centre adjoins the main A226 through route and lies approximately 180m north east of Northfleet Station. The Hive is well connected via public transport with bus stops situated on High Street to the south served by a range of bus services providing connections to wider area. The centre offers a limited retail offer with the mix of uses reflective of its role in serving the immediate population living within walking distance. The Hive provides just 13 units, with notable occupiers including a newsagent, launderette, a take away and charity shop.

- 2.26 The expansion of The Hive is supported in the Gravesham Core Strategy under policy CS03 through the Old Northfleet Residential Extension Key Site (sub-area 1.4), which seeks to provide a residential development of around 530 dwellings, open space, an extension and improvements to the Hive local centre and provision of community facilities.
- 2.27 Gravesend Town Centre is located approximately 3km to the west of the Site. Gravesend is an allocated Town Centre as set out within the Gravesham Core Strategy and comprises the primary retail focus within Gravesham. The Town Centre provides a mix of both a comparison and convenience retail offer, as well as cultural, leisure and administrative uses, including a library, the Woodville Halls theatre and the Gravesham Borough Council Offices which adjoins Gravesend Community Square, a prominent public space in the Town. The Town Centre is well served by local bus routes as well as Gravesend train station providing a High-Speed rail link to London St Pancras. The centre contains a number of multiple retailers including Tesco Metro, Primark, Boots, Superdrug and Wilkos but is largely characterised by largely lower value retailers, which have dictated the growth of retail representation in the Centre towards the mid-lower end of the market.
- 2.28 Dartford Town Centre is located approximately 7km to the west of the Site and is the main centre within Dartford Borough. It is allocated as a Main Town centre within the Dartford Core Strategy (2011). Dartford Town Centre provides a range of retail, services, leisure, cultural and civic facilities although it is considered to function primarily as a lower to mid-tier retail and service destination. The centre accommodates a range of comparison goods retailers including Asda Living, Boots, Poundland Primark and JD Sports. It also accommodates a strong convenience offer, including Sainsbury's and Aldi. It mainly caters for day-to-day food and non-food shopping needs with a retail offer that is largely value-led. The largely traditional retail offer within Dartford is also complemented by various markets held on weekly basis.
- 2.29 In addition to the retail representation, Dartford Town Centre accommodates the Dartford Council civic offices, the Orchard Theatre, a library, a range of bars and restaurants as well as the Dartford Central Park, all of which act as important assets in generating visits, footfall and general activity in the Town Centre.
- 2.30 Bluewater Shopping Centre is situated circa 3.5 km south-west of the Site. Located within Dartford Borough, Bluewater is bounded to its south by the A296, the B255 to its east and the A226 to the north. By virtue of its location in proximity to strategic road networks, specifically the M25, the Centre draws trade from a broad catchment with customers predominantly accessing the destination by car which is reflected by the presence of some 13,000 managed car parking spaces.
- 2.31 Bluewater is not a defined Town Centre, being specifically recognised as being out-of-centre within the Dartford Core Strategy. However, it is recognised as a 'Regional Comparison-Shopping Centre' within the retail hierarchy for Dartford Borough, and the Core Strategy confirms that a proportion of local expenditure growth can be accommodated by providing additional floorspace at Bluewater. The retail offer at Bluewater is dominated by national multiple retailers, services and leisure operators trading from modern format stores. Bluewater is formed of three distinct malls arranged over two floors which collectively house a large range of comparison goods retailers which include department stores as well as high end fashion retail and high street fashion retail. Retail occupiers within Bluewater include John Lewis, Marks and Spencer's, House of Fraser, Apple, Next, Boots and Dyson.
- 2.32 Bluewater has also sought further diversification in its offer through the provision of permanent and temporary leisure uses. These include the temporary erection of an Ice Rink and Christmas Grotto in the winter months, as well as an urban beach, fairground rides, attractions, food and drink stalls and associated facilities during the Summer. This is in addition to a 17-screen Showcase Imax cinema, and upwards of 60 restaurants trading alongside the retail offer.

- 2.33 Outline permission was granted in June 2017 under Planning Permission Ref. 16/01207/OUT for the extensions and alterations to the shopping centre through part demolition, alteration and refurbishment of existing buildings/structures and erection of new buildings/structures to provide up to 19,950 sq. m of comparison retail and related uses. Reserved Matters were approved in October 2019.
- 2.34 However, it is not known how much of the floorspace has been implemented, and how much will eventually come forward. At the time of the 2021 Retail Study in January 2021, it was noted that, around 4,267 sq. m gross of comparison retail floorspace had been developed to date. It was forecast that the residual comparison goods floorspace could achieve a total turnover of £12.4m in 2025 and the convenience goods floorspace could achieve a total turnover of £1.9m. However, there was some uncertainty at the time of the study whether the committed floorspace would be delivered as planned due to the impact of recent market trends on the retail sector and is still not clear whether the remainder of the floorspace will continue to be developed as planned.
- 2.35 Beyond these, there are a number of other centres and retail locations which draw trade from the wider Gravesham / Dartford area, including Lakeside Shopping Centre and associated retail parks in West Thurrock, Crayford (including the Tower Retail Park which sits on the edge of the Town Centre) Sevenoaks and Central London, although the influence of the development proposals over these centres will be less than the ones outlined above, and will not be at a level which could be considered to be *significant*.

## LOCAL ECONOMIC CONTEXT

- 2.36 The supporting Planning Statement and Socio-Economic chapter of the Environmental Statement confirm that there is an overriding need for development in this location that is capable of delivering economic growth and prosperity not only for Northfleet but Gravesham as a whole. The socio-economic analysis of the Site has identified that as of June 2022, 2,695 people in Gravesham were claiming out-of-work benefits, from a working age population of c.52,613. This is a claimant rate of approximately 5.12% - higher than the Kent average of 3.96% and National average of 4.61%.
- 2.37 This context is acknowledged by commentary within the Core Strategy which sets out that “Gravesham has the smallest economy in Kent. It has undergone significant restructuring in recent years with a slight fall in employment...Unemployment above county and regional rates has prevailed in Gravesham over the past decade. This could be linked to the fact that, on average, Gravesham residents of working age have lower attainment and skills levels than other parts of the South East and nationally”. Whilst the Core Strategy is dated, the statistical evidence confirms that this observation is still relevant.
- 2.38 As this Statement will discuss, there is a significant amount of retail spend originating within the Borough, which is spent in other locations, representing significant leakage of revenue that would be spent within Gravesham and deliver associated economic benefits.
- 2.39 Paragraph 2.7.5 of the Core Strategy notes that there is a need to improve the local economy by improving the skills of the local workforce, providing a greater number, variety and quality of jobs, and maximising the economic regeneration potential offered by high-speed rail services from Ebbsfleet and Gravesend Town Centre by ensuring a ready supply of good quality sites for economic development. The jobs associated with the proposed retail and leisure uses will provide a significant opportunity to boost the local economy.

# 3.0 RELEVANT PLANNING POLICY

3.1 This Section sets out the planning policy relating to retail and F&B uses, which is considered to be relevant to this Statement and, in turn, consideration of the Application. It considers, firstly, national policy contained in the National Planning Policy Framework 2021 (NPPF) and the extant accompanying guidance contained in the Planning Practice Guidance (PPG). It then considers local policy, namely the Gravesham Development Plan which comprises the Gravesham Local Plan Core Strategy (2014) and the Gravesham Local Plan First Review Saved Policies (1994).

## NATIONAL PLANNING POLICY

3.2 **Chapter 7** of the NPPF contains the principal policies on Ensuring the Vitality of Town Centres. Paragraphs 86-91 of the NPPF seek to ensure the vitality of town centres and thus require that planning policy should provide a framework to assess proposals for main town centre uses, such as retail, which cannot be accommodated in or adjacent to town centres.

3.3 Specifically, **Paragraph 86** states that planning policies, and decisions should support the role of town centres by taking a positive approach in relation to growth, management and adaptation. **Part a)** refers to a hierarchy of town centres and the need to promote long term vitality and viability by allowing growth and diversity that respond to the rapid changes in the retail and leisure industries.

3.4 Further, **paragraph 87** requires the planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan to be subject of a sequential test. Both the proposed retail and F&B offer would constitute a 'main town centre use'.

3.5 The rationale supporting this requirement is that 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. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, and the sequential test should be considered in light of the latest NPPF policy, which confirms that when considering availability, it is necessary to consider sites which may become available within a reasonable period.

3.6 **Paragraph 88** of the NPPF states that in considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Further, in order to comprehensively explore a breadth of opportunities for town centre uses, applicants and local authorities should demonstrate a degree of flexibility in respect of format and scale.

3.7 **Paragraph 90** of the Framework requires an impact assessment to be undertaken where retail and leisure development sits outside town centres and exceeds a locally set threshold. In the absence of a locally prescribed threshold and in line with national policy, a default 2,500 sq. m gross external floorspace threshold is applied. **Paragraph 91** confirms that development should be refused permission if it is likely to have a *significant adverse* impact. The proposed retail and leisure development would exceed the default floorspace threshold [and there is no locally prescribed threshold?].

3.8 The latest revision of the Planning Practice Guidance pertaining to town centres and retail was published in September 2020 and provides specific guidance on plan-making and decision taking for retail and other town centre uses. Specifically, it sets out details of how the sequential test should be applied by Applicants and considered by Local Authorities.

3.9 The application of the sequential test should be proportionate and appropriate for the given proposal. The following considerations should be taken into account in determining whether a proposal complies with the sequential test (Paragraph 011 of the Planning Practice Guidance<sup>1</sup>):

- Is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal;
- In light of the above mentioned flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where an edge of centre or out of centre location is proposed, preference should be given to accessible sites that are well connected to the town centre; and
- If there are no suitable sequentially preferable locations, the sequential test is passed.

3.10 As noted above, when assessing applications for retail development outside of town centres, which fail to accord with an up-to-date Local Plan, paragraph 90 of the NPPF provides that LPAs should require an impact assessment if the development is over 2,500 sq. m. or a proportionate, locally set floorspace threshold. This should include assessment of:

- The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider retail catchment area.

3.11 The Planning Practice Guidance notes that the impact test should also be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. Retail uses tend to compete with their most comparable competitive facilities. As such, impact should be assessed on a like-for-like basis.

3.12 A judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances. Where evidence shows that there is not likely to be a significant impact on a town centre, the LPA must then consider all other material considerations in determining the application, as it would for any other development.

3.13 Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, paragraph 91 of the NPPF provides that it should be refused.

## **LOCAL PLANNING POLICY**

3.14 The adopted development plan for Gravesham Borough Council comprises of the following documents:

- *Gravesham Local Plan Core Strategy (2014)*;
- *Gravesham Local Plan First Review Saved Policies (1994)*; and
- *Kent Minerals and Waste Local Plan 2013 – 2030 (2016, revised 2020)*.

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<sup>1</sup> Reference ID: 2b-011-20190722

## GRAVESHAM LOCAL PLAN CORE STRATEGY (2014)

- 3.15 The Core Strategy was adopted by the Council in September 2014 and represents the principal policy document within the Gravesham Local Plan. The Core Strategy sets out a long-term vision for the future of the Borough based on the distinctive characteristics of Gravesham and what in turn is required to support communities to create an attractive place to both live and work. The Strategy guides the amount, type, location and detailed design of future development as well as supporting other priorities such as the Councils regeneration proposals, investment in infrastructure, job creation and promotion of healthy communities.
- 3.16 **Policy CS08** (Retail, Leisure and the Hierarchy of Centres) sets out the Council's strategic approach in respect of retail and commercial leisure uses and the application of national policy with regards to the 'sequential' and 'impact' tests as required by Chapter 7 of the NPPF. The Proposed Development includes retail, leisure and other main town centre uses and will, therefore, need to have regard to this policy.
- 3.17 Gravesend Town Centre is at the top of the hierarchy of centres within Gravesham and is the preferred location for new retail and leisure facilities. Below this are a network of Local Centres, the role of which is to provide retail shops and services such as post offices, petrol stations and public houses, which enable local communities to meet their everyday needs. In line with this, the Council shall apply a sequential approach to the location of main town centre uses and require an impact assessment of larger retail and leisure development. The policy also seeks to safeguard the retail character and function of existing and new centres by resisting development that would adversely affect their vitality and viability. Retail proposals as well as leisure entertainment facilities that exceed 2,500 sq. m are subject to an impact assessment in accordance with national policy.
- 3.18 New retail and leisure development should be directed to Primary Shopping Area of Gravesend in the first instance, although it is recognised that there is insufficient space to accommodate all the need which will arise over the Plan Period. The Heritage Quarter is identified as a Key Site for expanding the retail offer within the Town Centre, including the provision of larger format units retail, as well as a cinema and restaurant units.

## GRAVESHAM LOCAL PLAN FIRST REVIEW SAVED POLICIES (1994)

- 3.19 Although a number of policies from the 1994 Local Plan remain in place, none of these are relevant for the purposes of this Assessment.

## EMERGING POLICY

- 3.20 In line with paragraph 33 of the NPPF, the Council undertook a review of the Core Strategy in 2019. This review found a requirement for a partial review of the Core Strategy in respect of Policy CS02 (Scale and Distribution of Development).
- 3.21 Following initial consultation in 2018, the Council undertook Regulation 18 (Stage 2) consultation on the Partial Review of the Local Plan Core Strategy, Site Allocations and Development Management Policies Document between October and December 2020. Views were sought on the following documents:
- Part 1: Local Plan Core Strategy Partial Review and Site Allocations Document;
  - Part 2: Development Management Policies Document; and
  - Supporting Documents.

- 3.22 Part 1 sets out the housing, employment and retail issues and needs of the Borough to 2036 and sought comments on the proposed options for addressing them, as well as on proposed site allocations. Part 2 provides detailed policies which apply to the whole Borough and will be taken into account when considering planning applications.
- 3.23 The Regulation 18 (Stage 2) Consultation document identifies a need for a further 24,300 sq. m of comparison floorspace and 11,100 sq., m of convenience floorspace across the Borough to 2037. This sought views on whether the focus for growth should continue to be on Gravesend Town Centre, or whether the centre should be allowed to diversify, with retail floorspace being directed to other areas within the Borough to support the local area and sustainability.
- 3.24 On the basis that the updated Local Plan has yet to be submitted for Examination, the preparation of the Local Plan has not progressed beyond the Regulation 18 stage (in late 2020) no weight is afforded to it.

### RETAIL AND COMMERCIAL LEISURE ASSESSMENT (2016)

- 3.25 The latest Retail and Commercial Leisure Assessment covering Gravesham Borough was published in November 2016 and covers both Gravesham Borough and Medway Council. This document is hereafter referred to as “the 2016 Retail Study”.
- 3.26 It was undertaken as part of a wider instruction to inform the North Kent Strategic Housing and Economic Needs Assessment (SHENA) and covered a wider area than the Primary Catchment Area for the proposed development (see Section 4), although the Study Area has been used to guide the survey zones for the retail assessment for this application.
- 3.27 The Retail and Commercial Leisure Assessment provides a qualitative and quantitative assessment of the needs for retail and leisure development in the Gravesham and Medway areas through to 2038, based on a range of differing scenarios in terms of population growth and growth in retail and leisure spending. The survey was underpinned by a household survey undertaken by NEMS, who have also undertaken the survey for this application.
- 3.28 The Assessment describes the changing roles of the town centres, instigated by the continued ramifications of the financial crisis and the progressive rise of online shopping. It also highlights the dominance of Bluewater on the Gravesend area, noting that the ability of Gravesend Town Centre to maintain or even extend its catchment will, over the course of the study period, be limited by Bluewater’s ongoing strength as a shopping destination. It concludes that Gravesend Town Centre will continue to need to have a role and function that differs from Bluewater in order to be a strong performing centre.
- 3.29 Excluding commitments, the Assessment identified a need for a at least a further **16,600 sq. m** net of comparison floorspace in Gravesham by 2037, increasing to **17,600 sq. m** based on higher population growth. However, given the time that has passed since the publication of the 2016 Retail Study, these figures are likely to have changed due to changes in expenditure forecast and new developments / commitments coming forward.

### GRAVESHAM RETAIL AND COMMERCIAL BACKGROUND PAPER (2020)

- 3.30 As part of reviewing the evidence base supporting the emerging Local Plan, the Council consulted on the Gravesham Retail and Commercial Background Paper in October 2020 as part of Regulation 18 (Stage 2) consultation.
- 3.31 The background paper develops much of the evidence base set out in the 2016 Retail Study and provides a context for the emerging Local Plan. The paper identifies Gravesend Town Centre as the primary focus of retail and service activity in the Borough, in addition to a number of ‘local centres’ and lone village shops serving individual neighbourhoods beneath it within the local hierarchy. The paper references the impact of Bluewater shopping in eroding the comparison good retail offer in both Gravesend and Dartford Town Centres.

- 3.32 The findings of the background paper also reiterate those made in the 2016 Study in seeking to increase the number of people living in the Gravesend Town Centre to further support existing retail floorspace, particularly smaller independent traders which provide a distinct offer from the national multiples available elsewhere. The paper also maintains that Gravesend Town Centre will continue to be the primary focus of main town centre uses in the Borough and the area to which major investment will be directed.
- 3.33 It is clear from both the 2016 Retail Study and the 2020 Background Paper, that Gravesend Town Centre needs to continue to diversify its offering to ensure that it offers a distinctly different offering from Bluewater. This could be to focus on a more convenience-led, lower market offer, providing opportunities for independent retailers, as well as promoting its heritage assets as part of a wider town centre offer.

### DARTFORD AND EBBSFLEET RETAIL AND LEISURE STUDY (2021)

- 3.34 The Dartford and Ebbsfleet Retail and Leisure Study was published in January 2021 on behalf of both Dartford Borough Council and the Ebbsfleet Development Corporation. The purpose of the Study was to provide a robust evidence base needed to inform the retail and leisure planning policies that form part of Dartford Borough Council's Local Plan Review. For the Ebbsfleet Development Corporation the purpose of the Study was to help to inform the planning and delivery of new sustainable centres as part of the wider regeneration of Ebbsfleet Garden City. Reference is made to "the 2021 Retail Study" throughout this Statement, where relevant.

### CONCLUSIONS ON PLANNING POLICY

- 3.35 Taking account of the above, it is possible to draw the following conclusions in relation to the relevant planning policy:
- The Site is out-of-centre in policy terms. Therefore, the application must demonstrate that:
    - there are no more sequentially preferable sites capable of accommodating the Proposed Development. Within Gravesham, the focus for the sequential test should be on Gravesend Town Centre; and
    - the development will not lead to an impact on any existing or proposed centre to an extent that could be considered to be *significantly adverse*;
  - with regard to the wider retail context, Bluewater Shopping Centre has a dominant presence within the Catchment, meaning that Gravesend and Dartford Town Centres have had to evolve to serve a different market, as they are unable to compete on a like-for-like basis. This diversification will should continue.

# 4.0 BACKGROUND INFORMATION

- 4.1 This chapter of the Statement sets out the background work which has been undertaken in order to undertake the sequential test and to assess the impact of the Proposed Development.
- 4.2 The proposed scope of the background information to support the retail assessment was submitted to the Council as part of the pre-application discussions in a Retail Scoping Report dated 21 July 2022. A copy of the Retail Scoping Report is contained at **Appendix 1** of this Statement
- 4.3 In particular, this Retail Scoping Report sought to agree the following:
- The parts of the development proposal which will be assessed within the Retail Statement;
  - The format of the Household Survey to understand the existing shopping patterns in the Primary Catchment Area;
  - The Study Area for the Household Survey;
  - The Baseline Data, including the following:
    - The scope of the Sequential Test; and
    - The scope of the Town Centre Health Checks, including which centres to assess.
- 4.4 Following feedback from the Council on a number of matters, including the scope of the Study Area for the Household Survey and the centres to assess, this Section sets out the background work which has been undertaken to inform the assessment, the key assumption which have been made, and the relevant data sources which have been used. These are set out in turn below.

## THE STUDY AREA

- 4.5 The Study Area for the development has been based on the Study Area for the 2016 Retail Study, updated in line with comments made by Gravesham Borough Council at the pre-application stage. The Study Area is broken down into eight Zones, as set out in **Figure 4.1** below, and shown on the plan at **Appendix 2**.

Zone	Post Codes
1 Dartford Zone	DA1 1, DA1 5, DA2 6. DA2 7 (eastern part), DA1, 2
2 Greenhithe / Swanscombe	DA9 9, DA10.0, DA10 1
3 Southfleet / Longfield Zone	DA2 8, DA3 7, DA13,9
4 West Kingsdown Zone	DA3 8, DA4 0, DA4 9, TN15 6, TN15 7
5 Northfleet / Gravesend Zone	DA11 0. DA11 7, DA11 8, DA11 9, DA12 1, DA12 2, DA12 4, DA12 5
6 Shorne / Cobham Zone	DA12 3, ME3, 7 (part – to include Higham and Lower Higham)
7 Meopham Zone	DA13 0
8 Swanley Zone	BR8 7, BR8 8, DA2 7 (western part)

Figure 4.1 -Study Area Zones

## THE HOUSEHOLD SURVEY

- 4.6 A Household Survey was undertaken by NEMS, with a total of 851 interviews conducted between Monday 8th and Thursday 25th August 2022. NEMS also undertook the Household Survey for the 2016 Retail Study, which was used a guide for both the questions asked and the scope of the survey area
- 4.7 Interviews were conducted using NEMS in-house CATI (Computer Assisted Telephone Interviewing) Unit. Respondents were contacted during the day and in the evening. All respondents were the main shopper in the household, determined using preliminary filter questions. The results of the Household Survey have been used to understand the current shopping patterns within the Study Area.

## THE BASELINE DATA

- 4.8 The section below set out the baseline data and data sources which have been used to inform the retail impact assessment, and have been agreed with the Council at the pre-application stage unless otherwise stated.

## BASE AND ASSESSMENT YEARS

- 4.9 The base year for the retail impact assessment is 2022, being the year the planning application is submitted.
- 4.10 The Assessment year is 2027, being five years following the submission of the application. Assuming that planning permission is granted in 2023, this could represent the first full year of trading, where the greatest impacts are likely to be

observed. The Horizon Year is 2032, being ten years following the submission of the application, and allowing sufficient time for changes to shopping patterns to stabilise.

## **PRICE BASE**

- 4.11 The price base for the impact assessment is 2018, in line with the latest figures from the Experian Retail Planner Briefing Note 19 (January 2022).

## **POPULATION AND POPULATION GROWTH ESTIMATES**

- 4.12 Population and population growth estimates have been taken from the 2016 Retail Study, which provides population growth estimates up to 2037, beyond the Horizon assessment year. This approach has been agreed with the Council at the pre-application stage. The total population of the Study Area is 256,055 in 2022, rising to 266,243 in 2027 and 279,002 by 2032.

## **EXPENDITURE ESTIMATES AND GROWTH**

- 4.13 The 2022 expenditure rates for comparison and convenience goods have been provided by Experian for the survey zones identified above. These have been grown in line with the latest Experian figures as set out in Table 1a of the Retail Planner Briefing Note 19. This is the same methodology adopted for the 2016 Retail Study.

## **SPECIAL FORMS OF TRADING**

- 4.14 A deduction for Special Forms of Trading has been made at the Base, Assessment and Horizon years, in line with the figures set out in Appendix 3 of the Experian Retail Planner Briefing Note 19.

## **PROPOSED TURNOVER / SALES DENSITIES**

- 4.15 The anticipated sales densities for the proposed retail floorspace associated with the development will be split as follows:

- Retail uses along Harbourside Walk and the Stadium Neighbourhood - £6,500 per sq. m
- Other local / community retail uses - £4,000 per sq. m

- 4.16 This is based on the turnovers for similar type of floorspace set out in the 2016 Retail Study, which adopted a sales density of £6,000 per sq. m,

## **SALES EFFICIENCIES**

- 4.17 We have not applied a growth in the sales efficiency of the development, as there is no justification or evidence to suggest that sales efficiencies of the newly built floorspace will increase on a year-by-year basis in the short term. This method has also been adopted in the retail impact assessment for the Ebbsfleet Central application.

## COMMITMENTS

- 4.18 No commitments of any note were identified at the pre-application stage through the discussions with the Council. However, since this time, an outline planning application has been submitted for Ebbsfleet Central, and this has therefore been included as a commitment to allow the Council to understand the cumulative impacts should both developments be approved. We also consider the cumulative impact of the proposed retail floorspace at Eastern Quarry.
- 4.19 We understand that some of the floorspace approved for the extension to Bluewater Shopping Centre has not yet been built out in full. Given the uncertainty as to whether the residual floorspace will come forward, this has not been modelled within the impact tables. However, the effects of this proposal as well as implications for delivery of the extended floorspace are addressed in Section 6 of this Statement.

## EXPENDITURE INFLOW FROM OUTSIDE CATCHMENT AREA

- 4.20 As set out in the Retail Scoping Report, given the nature of the proposals and the links with the stadium use, it is anticipated that 75% of the turnover of the proposed retail floorspace will come from within the Study Area. This represents the Primary Catchment Area (PCA), resulting in an inflow of around 25%. While the vast majority of the regular users of the retail floorspace will come from the PCA, given the type and scale of retail proposed and the very nature of the football stadium, which will welcome visitors for football matches or other live events, some trade will be drawn from a much wider area.
- 4.21 The diversion of trade is likely to come from a wide range of existing stores and centres across a large geographical area, meaning that the impact on any single centre as a result of this diversion would be negligible. This has been agreed with the Council at the pre-application stage.
- 4.22 Please note that this figure will only apply to the retail units focussed along Harbourside Walk (in the Marketplace Neighbourhood) and the Stadium Neighbourhood, forming part of the wider leisure destination. It is anticipated that the small-scale retail designed to meet the local needs, including any small-scale convenience units, are likely to have a much higher proportion of their expenditure generated from within the PCA, at around 95%.

## THE SCOPE OF THE SEQUENTIAL TEST

- 4.23 A sequential test has been undertaken to understand whether there are any more centrally located sites capable of accommodating the proposals. In doing so, we have focused in the first instance on the ability to accommodate the development in its entirety, rather than the retail and F&B uses in isolation, either in whole or in a disaggregated format. However, to demonstrate flexibility we have also considered sites which could accommodate the retail and F&B offer in isolation, bearing in mind their role with the Proposed Development as a whole.
- 4.24 The Sequential Test focuses on the following centres:
- Gravesend Town Centre
  - Dartford Town Centre
- 4.25 Bluewater Regional Shopping Centre is not a Town Centre and is only forecast to provide an additional 5,000 sq. m of floorspace within the Dartford Local Plan. Notwithstanding the fact that there is an extant permission for additional retail floorspace, which has only in part been implemented, it is not appropriate to consider it for the purposes of the sequential

test for the Proposed Development. The Hive Local Centre has also been excluded due to the nature and scale of the centre, meeting a very localised need.

- 4.26 For retail purposes, edge-of-centre sites are defined within the NPPF as accessible sites located within 300 metres of the Primary Shopping Areas (PSA) and Frontages and for other uses (including leisure), sites within 300 metres of a town centre boundary. Anything beyond this, including sites which may be closer to the PSA but not easily accessible, have been considered to be out-of-centre.

## TOWN CENTRE HEALTH CHECKS / IMPACT

- 4.27 The Retail Impact Assessment (RIA) as set out in Section 6, considers the potential impact of the development on the vitality and viability of existing stores and centres upon which the Proposed Development *could* have a *significant adverse* impact. The RIA also considers the potential impact of the Proposed Development on planned and committed investment in these centres. Although Bluewater is not an allocated Town Centre, the Council has requested that this is also considered in terms of the potential impact.
- 4.28 The RIA also includes Town Centre Health Checks, which will consider how any diversion of trade from these centres could affect their overall vitality and viability. This is essential to understand whether any impacts identified in the RIA tables could lead to an impact that would be considered 'significantly adverse' in the context of the centres considered.
- 4.29 Health Checks have been undertaken for the following centres:
- Gravesend Town Centre
  - Dartford Town Centre
  - The Hive Local Centre
  - Bluewater Regional Shopping Centre
- 4.30 As advocated by the Planning Practice Guidance, the Health Checks consider the following criteria (where information is available), to provide an overview of how well they are performing:
- Diversity of uses
  - Proportion of vacant street level property
  - Commercial yields on non-domestic property
  - Customers' experience and behaviour
  - Retailer representation and intentions to change representation
  - Commercial rents
  - Pedestrian flows
  - Accessibility
  - Perception of safety and occurrence of crime
  - State of town centre environmental quality
  - Balance between independent and multiple stores
  - Extent to which there is evidence of barriers to new businesses opening and existing businesses expanding
  - Opening hours/availability/extent to which there is an evening and night time economy offer.

4.31 In addition, the assessment will also consider the potential impact on the proposed retail centre at Ebbsfleet Central, as requested by the Council at the pre-application stage, as well as the potential impact of the development on Eastern Quarry.

Gravesham Borough Council

# 5.0 THE SEQUENTIAL TEST

- 5.1 This section of the Statement assesses the Proposed Development against the provisions of Paragraph 87 of the NPPF and Policy CS08 of the adopted Core Strategy, which both require a sequential assessment to be undertaken for planning applications for main town centre uses, including retail and F&B, which are not in an existing centre or in accordance with an up-to-date development plan. As noted in Section 4, the scope of the sequential test was discussed and agreed at the pre-application stage.
- 5.2 As set out previously in this Statement, the Site is considered to be out-of-centre for all purposes of the retail assessment. Policy therefore dictates that the application must be accompanied by a sequential assessment considering whether there are any more centrally located sites capable of accommodating the Proposed Development.
- 5.3 Notwithstanding this, the site forms part of the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area, which the Core Strategy recognises could support additional jobs as well as housing. Further, the re-provision of the football stadium lies at the heart of the development, and the supporting retail and leisure uses will help to support ongoing viability of this key community asset. Therefore, there is a location-specific need, as the proposed retail and F&B offer in this location will help to support the viability of the football stadium, which cannot be achieved if these elements are disaggregated.

## SCOPE OF SEQUENTIAL TEST

- 5.4 The Planning Practice Guidance (PPG) provides a checklist of matters for Local Planning Authorities to consider when determining applications for town centre uses in out-of-centre locations. These are as follows:
- With due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered;
  - Where the proposal would be located in an edge-of centre or out-of-centre location, has preference been given to accessible sites that are well connected to the town centre. Any associated reasoning should be set out clearly;
  - Is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal; and
  - If there are no suitable sequentially preferable locations, the sequential test is passed.
- 5.5 It follows that applying the sequential approach should have regard to the need, both as regards the consumer and operator, that will be met by the development. It is not an academic exercise divorced from the commercial realities of what it is that developers and landlords are seeking to supply in response to market demand. For it to have meaning, the sequential approach must be applied in a way that allows the identified need to be fully met. Applicants and local planning authorities are to demonstrate flexibility in terms of format and scale of the developments.
- 5.6 The PPG advises that applicants and planning authorities should consider what contribution more central sites are able to make individually to accommodate the proposal. This should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations.

5.1 There have been a series of court and appeal decisions which explain the correct application of national policy relating to the sequential test. The Supreme Court in *Tesco Stores v Dundee City Council* [2012] UKSC 13, 21 March 2012, considered how the sequential test should be applied. It concluded that:

*“...it is the proposal for which the developer seeks permission that has to be considered when the question is asked whether no suitable site is available within or on the edge of the town centre”*

5.2 The Supreme Court was clear that a developer or retailer should not be required to materially change a development to operate in an artificial world. At Paragraph 38 of the transcript, Lord Hope states:

*“The whole exercise is directed to what the developer is proposing, not some other proposal which the planning authority might seek to substitute for which is something less than that sought by the developer...” “But these (sequential assessment) criteria are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest in doing so”.*

5.3 It is not the intention of the policy to require a developer to materially alter the proposal so it can be accommodated by an alternative site.

5.4 The Court provided further analysis in *Zurich Assurance Limited (t/a Threadneedle Property Investments) V North Lincolnshire Council and Simons Developments* [2012] EWHC 3708 (Admin). In the judgement, Justice Hickinbottom concluded that: *‘It is also important to mark that developers, and planning authorities, work in the real world. Working in the real world, the [planning] committee were entitled (and, indeed, bound) to take into account the evidence... Marks and Spencer would not locate to Scunthorpe town centre in the event that this application for the site was refused.’*

5.5 The Judgement is explicit in that it requires decision makers to take into consideration the commercial requirements and objectives of operators, developers and the wider commercial sector. Of particular relevance from the *Zurich* case was the acceptance that, should planning permission not be granted for the proposed development, the tenant would not occupy any of the sites that had been identified as alternatives. This accords with the principal objective of the sequential approach which is to direct development to defined centres in the first instance.

5.6 In *Aldergate Properties Ltd v Mansfield District Council*, the application of the policies in respect of suitability and availability, and the requirements for applicants to demonstrate ‘flexibility’ were considered. The Judgement states:

*“In my judgement, “suitable” and “available” generally mean “suitable” and “available” for the broad type of development which is proposed in the application by approximate size, type and range of goods. This incorporates the requirement for flexibility in [what was then paragraph 24 of the NPPF 2012], and excludes, generally, the identity or personal or corporate attitudes of an individual retailers”.*

5.7 The NPPF requires applicants to consider sequential sites that are ‘available’ which is defined as including sites due to become available within a ‘reasonable period’. A ‘reasonable period’ is not defined by the NPPF or PPG but is considered to be ‘reasonable’ having regard for the requirement the development is intended to meet and the relevant local context.

5.8 In the Scotch Corner Secretary of State Decision in December 2016 (APP/V2723/V/15/3132873 & APP/V2723/V/16/3143678) the Inspector found:

*“In carrying out the sequential test it is acknowledged that whilst [what was then paragraph 24 of the NPPF 2012] indicates that applicants should demonstrate flexibility on issues such as format and scale, **it does not require the applicant to disaggregate the scheme**. The sequential test seeks to see **if the application, i.e. what is proposed, can be accommodated on a town centre site or on sequentially preferable sites...**” (IR paragraph 11.7)*

5.9 More recently, on 1 October 2018, the Secretary of State has issued his decision in respect of development at *Cribbs Causeway* (APP/P0119/V/17/3170627). In that decision, the requirement for 'disaggregation' is specifically considered within the context that an explicit requirement was not re-introduced in the revised NPPF:

*In the Tollgate Village case the Inspector did consider that there was scope for disaggregating the proposals and spreading them onto different sites, even though ultimately such sites were found not to be available. However, the findings here were case specific and it is noted that they were not specifically endorsed by the Secretary of State in his decision. As a general principle an approach that involves disaggregation does not seem to me to fit well with the Aldergate Properties or Warners Retail judgements referred to above.*

5.10 In December 2014, the Communities and Local Government Committee assessed the operation of the NPPF and discussed whether disaggregation should be re-introduced into the application of the sequential approach. This was rejected by the Government and not seen as necessary, given the established policy and requirement to demonstrate 'flexibility'. The requirement to disaggregate a specific development was seen to go beyond the requirements of this policy.

5.11 It is therefore clear that there is no requirement to disaggregate a proposal into its smaller constituent parts when applying the sequential test, and when considering sequential sites, these need to be suitable for the development broadly proposed, and not an alternative hypothetical version of the proposal.

5.12 Based on the above, it is the case that:

- A site should be 'suitable' and 'available' to accommodate the full development as proposed having regard to the requirement for 'flexibility'. It is not the requirement of policy for a development to be materially altered to fit onto a more central site; and
- There is no policy requirement to consider the 'disaggregation' of a single development scheme into constituent parts.

5.7 The application proposals involve a comprehensive mixed-use development, including a replacement football stadium, up to 3,500 residential units, a 15,000 sq. m hotel, up to 18,000 sq. m of office floorspace and other community and healthcare uses, in addition to the retail and F&B uses considered in this Statement. The re-provision of the football stadium lies at the heart of the development, and the supporting retail and F&B uses will help to support ongoing viability of this key community asset.

5.13 The Site as a whole has a site area of approximately 19 hectares. With this in mind and taking account of the Case Law set out above, the sequential test should focus on sites capable of accommodating the floorspace associated with the proposed development i.e., 19 hectares. Although the retail and F&B use associated with the proposed development extend to a much smaller area, a maximum of circa 32,000 sq. m (gross GEA), as noted above and set out in more detail in the accompanying Planning Statement, the purpose of this floorspace is to support the remainder of the proposed development and is integral to viability of the development as a whole.

5.14 The proposed retail and F&B uses are intended to complement the wider development and will serve the incoming residential population, as well as visitors to the football stadium. Many of the trips generated to the Site, and turnover associated with these uses, will be derived from occupants of the proposed residential properties, workers associated with the proposed office and hotel uses, as well as those visiting the football stadium.

5.15 As such, it is neither viable nor practical to disaggregate these uses from the wider application proposals. Seeking to locate these uses elsewhere would not meet the specific customer need created by the wider uses at the Site. It therefore follows

that the sequential test should focus on sites capable of accommodating the development as a whole. Notwithstanding this, it is clear that there is a requirement for both Local Authorities and developers to apply a degree of flexibility when considering the sequential test. With this in mind, in this section we do consider opportunities for the proposed retail floorspace in isolation from the rest of the development, where it will still be possible for this floorspace to contribute to the overall viability of the Proposed Development.

5.16 Given the Site's location in the context of the wider area, and as agreed with the Council at the pre-application stage, the following centres have been considered as part of the sequential test in this instance are:

1. Gravesend Town Centre; and
2. Dartford Town Centre;
3. Ebbsfleet Valley Strategic Site.

5.17 The above locations are the only allocated sites within the PCA that are of scale to potentially accommodate the development. We consider both locations in turn below.

## ASSESSMENT OF ALTERNATIVE SITES

### GRAVESEND TOWN CENTRE

5.18 A site visit to identify any potential alternative sites in Gravesend Town Centre was undertaken on 10 August 2022, and further online checks have been made to identify whether any potential sites have become available since this date.

5.19 The initial site visit identified a total of 79 vacant units within Gravesend Town Centre, ranging from 10 sq. m to 2,900 sq. m. These are shown on the Goad Plan and accompanying schedule contained at **Appendix 3**.

5.20 Although there are a number of vacant units within Gravesend Town Centre, these are spread across the centre as a whole, with the largest vacancy being the former Debenhams on New Road at 2,900 sq. m in size (ground floor area). As the development is too large to be accommodated within the vacant units within the centre, it is necessary to understand whether there are any development sites within or on the edge of the Town Centre capable of accommodating the development.

5.21 Gravesham Local Plan Core Strategy identifies areas where major change is likely to take place over the plan period and identifies a number of 'Key Sites' for development within the Borough. However, the Heritage Quarter Key Site is the only Key Site located within Gravesend Town Centre capable of accommodating additional retail and F&B floorspace.

5.22 The Heritage Quarter Key Site (Key Site 3.1) has been identified as an area that could accommodate around 10,500 sq. m of primarily comparison retail floorspace over the plan period. Planning permission was originally granted for a mixed-use development to provide between 10,512 sq. m and 12,196 sq. m of retail floorspace within the western part of the Site as part of a large-scale mixed-use development in May 2014 under planning permission ref. 20120931, although the planning permission was not implemented.

5.23 More recently, planning permission was granted under planning permission ref. 20200343 for the redevelopment of the eastern part of the site for 242 residential units, with work commencing on the site in 2021. The plans for the remainder of the site, including for the provision of additional retail floorspace in the western area, have not been finalised. In any event, given the scale of development proposed by this application, the Heritage Quarter would not be large enough to accommodate the retail and F&B floorspace proposed, even if this was to be separated from the rest of the scheme.

- 5.24 Although it is likely that additional F&B floorspace may come forward, potentially linked to the creation of a new cinema, it will not be of the scale proposed at the Proposed Development. The Heritage Quarter Key Site can therefore be dismissed as a sequentially preferable site.
- 5.25 There are no other potential development sites either in or on the edge of Gravesend Town Centre capable of accommodating the development proposals. It therefore follows that the sequential test is passed in respect of Gravesend.

## DARTFORD TOWN CENTRE

- 5.26 A site visit to Dartford Town Centre to identify any potential alternative sites was undertaken on 10 August 2022, and further online checks have been made to identify whether any potential sites have become available since. The site visit identified a total of 36 vacant units within the Town Centre, ranging from 20 sq. m to 710 sq. m. These are shown on the Goad Plan and accompanying schedule contained at **Appendix 4**. Although there are a number of vacant units within Dartford Town Centre, these are not of a scale that could be considered suitable to accommodate the Proposed Development.
- 5.27 In terms of potential development sites, the Dartford Borough Council Core Strategy identifies one 'Strategic Site' within the Borough, although outside of the Town Centre, where major change is likely to take place over the plan period, including the provision of additional comparison goods floorspace. The **Northern Gateway Strategic Site** is located on the northern boundary of Dartford Town Centre and is an area comprising largely of vacant and redundant employment sites in a number of ownerships. The site is allocated for the provision of up to 2,040 homes and 1,200 jobs in a mix of employment uses. The allocation also includes provision for a mix of uses including local shops and leisure facilities to support the residential population. Given that the allocation only includes provision for local shops and leisure to support the residential population, it would not be suitable for the retail proposed by this application. Further, the site is too small to accommodate the development proposals and has now been built out for a residential-led development. It can therefore be dismissed as a sequentially preferable site.
- 5.28 There are no other potential development sites either in or on the edge of Dartford Town Centre capable of accommodating the development proposals. It therefore follows that the sequential test is passed in respect of the Town Centre.

## EBBSFLEET VALLEY STRATEGIC SITE

- 5.29 As set out in Section 2, The **Ebbsfleet Valley Strategic Site** has been identified as an area that could provide a new community of up to 10,000 new homes (up to 5,250 of which would be provided in the Plan period), a business district providing approximately 16,900 jobs (up to 9,500 which would be provided in the Plan period), associated leisure, retail and community facility uses to support local residents.
- 5.30 The Ebbsfleet Valley Strategic Site sits within the Ebbsfleet to Stone Priority Area within the Dartford Borough Council Core Strategy (2011), and is made up of three main sites: Ebbsfleet Central, Eastern Quarry and Ebbsfleet Green. Retail and leisure facilities will be provided as part of the overall offer, as well as hotels and community uses. Most of the retail will be designed to meet the day to day needs of the local population.
- 5.31 Although a considerable amount of retail and leisure floorspace is proposed across these allocations, specifically Ebbsfleet Central and Ebbsfleet Quarry, it would not be possible to locate the development as a whole, including the replacement football stadium, within any of the allocated Ebbsfleet sites, due to the range and scale of other uses to be provided in these areas, as demonstrated by the masterplan submitted in support of the Ebbsfleet Central application. There are also locational requirements associated with the proposed football stadium given the fact that the surrounding area has been the home of what is now known as Ebbsfleet United FC since the 1940's and therefore holds significant value to the football club.

- 5.32 Further, given that the primary purpose of the proposed retail and leisure floorspace is to support the viability of the new football stadium uses at the site, it would not be appropriate to disaggregate this element from the rest of the development. Although there is a need to demonstrate flexibility, disaggregating the retail element across the Application Site and either of the Ebbsfleet sites highlighted above would significantly undermine the role of the retail helping to support the viability and ongoing use of the stadium. Taking this into account, we conclude that the Ebbsfleet Valley Strategic Site as a whole can be dismissed as a sequentially preferable site.
- 5.33 Although not an allocated centre, it is acknowledged that **Bluewater Shopping Centre** does fall within the retail hierarchy for Dartford Borough. However, we note that Bluewater would not be large enough to accommodate the Proposed Development in its entirety. Further, as would be the case with the Ebbsfleet Valley Strategic Site, disaggregating the retail element across the Application Site and Bluewater Shopping Centre would significantly undermine the role of the retail helping to support the viability and ongoing use of the stadium. It can therefore be dismissed as a sequential site for the purposes of this assessment.

### **SUMMARY OF SEQUENTIAL ASSESSMENT**

- 5.34 The sequential assessment has considered whether there are any more centrally located sites that are available and capable of accommodating the development proposals as a whole. This assessment concludes that the application site is the most sequentially preferable site to accommodate the Proposed Development and accords with Policy CS08 of the adopted Core Strategy and Paragraph 87 of the NPPF.

# 6.0 THE IMPACT ASSESSMENT

- 6.1 **Paragraph 90** of the NPPF states that when assessing applications for retail and leisure development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. If there is no locally set threshold, the national default threshold is 2,500 sq. m. In this case, paragraphs 5.2.29-30 of the Core Strategy confirm that the local threshold has also been set at 2,500 sq. m for retail uses outside the primary shopping area and for leisure proposals outside the town centre.
- 6.2 The Planning Practice Guidance sets out a checklist for applying the impact test<sup>2</sup>, and notes that the following steps need be taken:
- establish the state of existing centres and the nature of current shopping patterns (base year)
  - determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur
  - examine the 'no development' scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);
  - assess the proposal's turnover and trade draw\* (drawing on information from comparable schemes, the operator's benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw)
  - consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities (which may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact)
  - set out the likely impact of the proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues
  - any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal's trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences for the vitality and viability of existing town centres
- 6.3 The PPG confirms that a judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances. Where evidence shows that there would be no likely significant impact on a town centre from an edge of centre or out of centre proposal, the local planning authority must then consider all other material considerations in determining the application, as it would for any other development.
- 6.4 The design year for impact testing will need to be selected to represent the year when the proposal has achieved a 'mature' trading pattern. This is conventionally taken as the second full calendar year of trading after the opening of each phase of a new retail development, but it may take longer for some developments to become established. As the retail development may not be fully established at the Design Year of 2027, we have also included an assessment at the Horizon Year of 2032.

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<sup>2</sup> Paragraph: 018 Reference ID: 2b-018-20190722

- 6.5 The application proposes up to 22,500 sq. m GEA of retail floorspace, up to 9,500 sq. m GEA of F&B floorspace and up to 1,100 sq. m GEA of other local community uses, which could include an element of retail. As such, an impact assessment is required to be submitted alongside the application in line with the adopted Local Plan.
- 6.6 The role and function of the existing comparison floorspace within the survey area has been established, enabling an assessment of trade diversion from each of these stores to take place, determining the resultant impact of the Proposed Development. The proposed retail floorspace will measure up to 22,500 sq. m (GEA) and up to 21,375 sq. m (GIA), of which approximately 80% (17,100 sq. m) will be used as net retail sales floorspace. It is estimated that up to 95% of this will be used for comparison sales, with the remaining 5% used for the sale of convenience goods.
- 6.7 It is important to note that the NPPF is concerned with '*significant adverse impact*'; the focus of **Paragraph 91** of the NPPF is not whether there will be an impact, but whether this impact is significant and adverse.
- 6.8 It is now a well-established principle that, where a proposal relates to a specific type of goods, an impact assessment should focus on that specific sector, with a 'like for like' principle. The NPPG is explicit in this regard and states:
- “As a guiding principle impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town centre stores as they would normally not compete directly). Retail uses tend to compete with their most comparable competitive facilities”.*
- 6.9 The development proposes up to 22,500 GEA of high street retail, in small-mid size units. It will therefore mostly compete with stores and centres selling similar ranges of goods, in similar store formats. Given the nature and the scale of the units proposed, the development will not accommodate large-format, value-led retailers, and is therefore unlikely to compete directly with value-led retail which comprises much of the retail provision in both Gravesend and Dartford Town Centres.
- 6.10 Although the development could include some convenience retail, this is likely to be small in scale and designed to meet the local need created by the residential and office uses. We have assumed that up to 5% of the main retail floorspace (in the Marketplace and Stadium Neighbourhoods) and 50% of the retail forming the local service floorspace could be used for convenience sales.
- 6.11 This section considers the potential impact from the retail floorspace forming part of the Proposed Development only. The potential impact of the F&B offer is considered separately within Section 7 of this Statement.
- 6.12 The associated retail impact tables are contained at **Appendix 5** of this Statement. Table 7 of **Appendix 5** confirms that the Proposed Development could generate a comparison goods turnover of **£106.86m**, which would be for the main high street retail in the Marketplace and Stadium Neighbourhoods, with a turnover of **£1.69m** relating to the local services, comprising both comparison and convenience goods to support the new residences and office space forming part of the development.
- 6.13 Although there is no longer a requirement to demonstrate the 'need' for a development, to fully understand impact, it is useful to understand the 'need' served by the new residential and employment floorspace.
- 6.14 As **Table 6.1** below sets out, the residential element alone could generate a total retail spend of up to **£39.86m** by 2032.

Dwellings	Up to 3,500
Total Population	Up to 5,552
Estimated Convenience Expenditure per capita	£2,427

Estimated Comparison Expenditure per capita	£4,751
Total Convenience Expenditure	Up to £13.48m
Total Comparison Expenditure	Up to £26.38m
Total Retail Spend	Up to £39.86m

Table 6.1 – Estimated Expenditure Generated by the Residential Development in 2032

- 6.15 This means that the expenditure generated by the proposed residential units creates more than sufficient expenditure to support the retail associated with the proposed convenience floorspace and local services. Given that this part of the development is intended predominantly to support those living at the Site, the impact of this local convenience retail has not been included within the RIA. The proposed residential floorspace will also create additional expenditure in addition that required to support the retail associated with the local services, part of which is likely to be spent at the main retail floorspace within the Site, but also within the wider network of centres, including Gravesend Town Centre.
- 6.16 Taking account of the above, the impact assessment set out in this section therefore focusses on the proposed high-street style retail contained in the Marketplace and Stadium Neighbourhoods as the remainder will be supported by the other uses within the Site, with little to no impact on wider shopping patterns.

## STATE OF EXISTING CENTRES

- 6.17 **Paragraph 90** of the NPPF requires an assessment to be undertaken of potential impacts upon town centre vitality and viability, including local consumer choice and trade in the town centre and wider retail catchment, as well as the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal. In order to be able to assess the likely impact of a development on a defined centre, it is necessary to undertake an assessment of that centre. The assessment should seek to establish the principal role and function of the relevant centres and their current performance and viability. As set out in Paragraph 017 of the NPPG:

*“A judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances”.*

- 6.18 Establishing the role and function of existing centres within the catchment area from which trade could be diverted is a key first step to undertaking an impact assessment and, accordingly, this assessment considers the health of the following allocated centres:

- Gravesend Town Centre
- Dartford Town Centre
- The Hive Local Centre
- Bluewater Regional Shopping Centre

- 6.19 Although only allocated as a Local Centre, given the proximity to the application site, an assessment of the Hive has been undertaken. In addition, upon the Council's request, we have also assessed the health of Bluewater Shopping Centre.

- 6.20 Retail is a fast changing and evolving market. Therefore, Montagu Evans undertook a site visit to all centres on 22 August 2022 in order to ensure accurate and up-to-date evidence of their vitality and viability. The centres are assessed against the series of established indicators as set out Paragraph 4.29 of this Statement.
- 6.21 A full Health Check of each centre is contained at **Appendices 7-9** of this Statement and each of these is summarised in turn below.

## GRAVESEND TOWN CENTRE

- 6.22 Gravesend Town Centre is the primary focus of retail and service activity in the Borough of Gravesham. The centre is well served by public transport with a high number of bus stops served by a range of services. Further, Gravesend train station is also located to the south west of the centre immediately west of Gravesend Community Square, providing a high-speed connection to central London, as well as other areas of Kent and south-east London. The Town Centre is therefore well connected in terms of non-car modes of transport.
- 6.23 At the time of the site visit, the centre had a vacancy rate of 14.4%, a notable decrease since the date of the 2016 Retail Study when the vacancy rate was 16.67%. This demonstrates an improvement in the centre over this period, despite the effects of Covid and the closure of national retailers including Debenhams.
- 6.24 There is a reasonably good range of uses found in the Town Centre, although it is noted that in recent years there has been a growth in low value offers, for example with B&M replacing Marks & Spencer in 2016. However, the retail services sector, as well as health and beauty have a strong representation within the centre, and it does contain a number of national retailers.
- 6.25 The centre has evolved since the opening of Bluewater Shopping Centre in 1999 to cater more towards the low-end retail market, as demonstrated by the opening of B&M. This can be seen as a strength, as it differentiates itself from the higher end offer at Bluewater.
- 6.26 In terms of its leisure offering, the centre accommodates a number of independent restaurants and cafes, pubs, bars clubs, as well as a multi-use theatre/ cinema/ exhibition space contained within Woodville Hall, which complement the retail offer.
- 6.27 The environmental quality of the town centre was observed be relatively high within in the retail core, in terms of being well-maintained, clean and pedestrian-friendly. The centre also accommodates a number of historic buildings which contribute to its overall appearance.
- 6.28 Significant portions of the Town Centre, particularly around the Council buildings, are pedestrianised and offer attractive public realm and space where users can convene and share positive interactions. The environmental quality of peripheral areas within the centre were in notably poorer condition, with litter observed and a greater prevalence of vandalism. It should be noted that these areas of worse environmental quality were observed to be less busy compared to core areas of the Town Centre.
- 6.29 The health check concludes that whilst the environmental quality of the centre is relatively health, there are opportunities for investment as the Town Centre continues to evolve.

## DARTFORD TOWN CENTRE

- 6.30 Dartford Town Centre provides a range of retail, services, leisure, cultural and civic facilities. The primary function of the centre has evolved as a lower to mid-tier retail and service destination catering predominantly towards local residents of the wider Dartford area. The Town Centre's retail and leisure offering is focused on the pedestrianised High Street and within its three main shopping centres; Priory Shopping Centre, Orchards Shopping Centre and Prospect Place.
- 6.31 With regard to accessibility, Dartford Town Centre benefits from excellent links via the rail, bus, and road network that connect it with the rest of Kent, the South East and London. The Town Centre also operates 24 bus services which link communities to Dartford Town Centre, Bluewater, Ebbsfleet and Gravesend Town Centre.
- 6.32 Environmental quality in the Town Centre is relatively strong and it has a total of 38 listed buildings and structures which help to create a distinctive historic urban character. There are a number of important strategic public spaces that contribute towards the Town Centre's overall environment. These include Central Park which provides the Town Centre with an attractive green space, the pedestrianised High Street, and the Station Concourse which acts as the main arrival point and gateway to Dartford. The Council is continually investing to improve these areas as part of its public realm strategy for the Town Centre.
- 6.33 Dartford also has a market town character which remains important to the success of the Town Centre. Markets take place on Thursdays and Saturdays on the High Street, where a variety of food and non-food goods can be purchased including fruit, vegetables, meat, fish, clothing, footwear, jewellery and hardware items. Dartford also hosts a variety of speciality markets every year including a French, Italian and Christmas Market.
- 6.34 The Town Centre has a relatively good mix of both national multiples and independent businesses. The key comparison goods retailers include Poundland, Boots, Primark, Ryman, WH Smith, JD Sports and New Look. Prospect Place accommodates a number of major national multiples including Asda Living, B&Q, Matalan and TK Maxx. Sainsburys in the Priory Centre is considered the main foodstore anchor. The other food stores comprise Marks & Spencer Simply Food, Aldi and Iceland. There is also a selection of independent retailers which are mainly located on the secondary streets and areas.
- 6.35 In terms of cafes, restaurants and pubs, there are limited national occupiers in the Town Centre, which suggests that there remains a clear gap in Dartford's market for food and beverage offer. The main brands comprise McDonalds, Wimpy, Pizza Hut, Costa Coffee, Subway.
- 6.36 As per the 2021 Retail Study, the vacancy rate recorded in Dartford Town Centre from 2019 was estimated at 18.6%, which was significantly higher than the Experian GOAD national average of 11.9%. The Town Centre has, however, shown clear signs of progression in the last 10 years given that in 2009 the vacancy rate was some 21.9% and in 2015 was 18.9%. At the time of the site visit in August 2022, 36 of the 392 units were identified as being vacant, equating to a vacancy rate of 9%. This therefore demonstrates that a significant improvement has occurred in terms of vacancies in Dartford Town Centre over the last 13 years. The vacancy rate has also fallen well below the national average of 18.6% (national vacancy rate taken from Experian Retail Planner Briefing Note 19) which shows that the centre is clearly performing well and in good health.
- 6.37 The 2021 Retail Study concludes that Dartford has several strengths including a diverse mix of independent and national multiple businesses, the street markets, theatre and Central Park. The location of the Town Centre in a wider context and the train station are also major attractions for people looking to live within commutable distance of London.

## THE HIVE LOCAL CENTRE

- 6.38 The Hive comprises a local shopping centre in the urban area of Northfleet. The Local Centre offers a limited retail offer with the range reflective of the convenience-based nature of the destination.
- 6.39 Access for those travelling to the centre by car is limited with a lack of dedicated space for parking. The primary source of provision comprises on street parking along residential roads in the vicinity. Despite being used largely by local residents within walking distance, the centre is highly accessible by public transport with bus stops situated on High Street to the south served by a range of bus services, all of which provide connections to wider areas and centres, namely Bluewater, Ebbsfleet and Gravesend. The centre is also located a short walk from Northfleet Train station situated approximately 180m south west.
- 6.40 The diversity of retail uses at the Hive is limited, comprising a newsagent, laundrette, takeaway, charity shop and convenience store/off license. Other uses include a library and training centre. While the diversity of uses is limited, given that the Local Centre only comprises circa 13 units (all of which have a small floorspace), a diverse range of retailers at this specific destination is unlikely. The mix of retail uses at the Hive reflects the centre's primary role in serving local residents, the vast majority of which will travel by foot/public transport. The retail uses are therefore underpinned by convenience with customers seeking a more varied offering naturally commuting to neighbouring centres where national retailers are present.
- 6.41 At the time of the visit, pedestrian flow around the Hive was very limited. The public realm was in relatively poor condition and the area appeared poorly-maintained. The Hive does offer seating, comprising walling around planting areas as opposed to purpose made benches. Attempts at improving the environmental quality within the centre were evident by way of variations in paving colour to create a patterned effect as well as tree planting. However, overall, the centre was clearly dated, run down and in need of investment to improve its appearance. Notwithstanding this, it is considered that the centre meets its objective in serving the day to day needs of the residents living close by.

## BLUEWATER REGIONAL SHOPPING CENTRE

- 6.42 Bluewater is an out-of-centre retail destination (identified as a Regional Comparison Centre) within Dartford Borough and is one of the UK's largest shopping and leisure destinations, with the centre having over 320 shops, cafes and restaurants. The shopping centre is anchored by three main department stores, namely John Lewis, House of Fraser and Marks & Spencer. In addition, the shopping centre is also home to a variety of high end and high street fashion retail. Retail occupiers within Bluewater including Apple, The White Company, Ted Baker, Boots, Dyson, JD Sports and Zara.
- 6.43 In addition to the retail facilities, Bluewater also includes the provision of both permanent and temporary leisure uses. Bluewater represents a major commercial leisure destination comprising three 'leisure villages' which together provide the likes of a 17-screen Showcase Imax cinema and over 60 restaurants including brands including Pizza Express, Ask, Cote and Nandos. Leisure uses also include a trampoline park and a zip-wire, as well as seasonal events.
- 6.44 Bluewater's retail offering is largely dominated by comparison goods, with a mid-high value offer. With regard to convenience floorspace, a planning condition at the site restricts the convenience goods retail floorspace which is reflected in the fact that Bluewater only has 16 convenience outlets equating to 1,254 sq. m. This represents just 5% of all units and 0.8% of the total floorspace. It should be noted that the Experian GOAD data does not account for the food hall in M&S and Waitrose, which equates to approximately 1,858 sq. m. Outside of the M&S and Waitrose offering the comparison retailing is mainly characterised by small scale, specialist food outlets, such as Hotel Chocolat and Lindt.
- 6.45 In terms of accessibility, Bluewater is easily accessed by public transport with rail connections available from Greenhithe and Ebbsfleet stations, which connect the centre to south east and central London, as well as north west Kent. Both train

stations are accessible via a fast-track bus service which provide access between Bluewater, Dartford, Ebbsfleet and Gravesend. Bluewater is easily accessible by car which is how the majority of visitors access the centre. The shopping centre has around 13,000 free car parking spaces.

- 6.46 Bluewater is a well-managed covered shopping centre that benefits from a clean, well maintained and high-quality environment and public realm. There is a good provision of seating and planted areas within the malls that add to the overall quality of environment. There is also a good provision of wayfinding and signage located around the centre. Outside of the covered malls Bluewater benefits from the attraction of lakes and play areas, all set within natural landscaped grounds.
- 6.47 In terms of vacancy rates, the Dartford and Ebbsfleet Retail and Leisure Study outlines that the number of vacancies recorded in the centre fell from 31 units in July 2010 to just 15 in November 2015. In 2019, vacancies rate rose to 28 vacant units which represented an overall vacancy rate of 8.7%. Observations from our site visit undertaken in August 2022 recorded an 11.5% vacancy rate which, although an increase on the 2019 rate, is still significantly below the UK average of 18.6% (national vacancy rate taken from Experian Retail Planner Briefing Note 19).
- 6.48 The 2021 Retail Study confirms that Bluewater covers a catchment area that extends across a wide area, well beyond the Borough area. The shopping centre is a key retail and leisure destination that provides a strong, high-quality comparison offering with a strong representation of national multiple retailers to serve the wider regional area.

## SHOPPING PATTERNS

- 6.49 In order to understand how the Proposed Development could impact upon shopping patterns in the wider area, it is first necessary to understand what the shopping patterns currently are at the 'pre-development' stage.
- 6.1 A household telephone survey has been undertaken in support of this assessment in order to understand the current shopping habits. This is set out in detail in Section 4 of this Statement. The key conclusions in terms of shopping patterns were as follows:
- Within the Northfleet / Gravesend 'home zone', Gravesend Town Centre has the largest market share for comparison goods (31.26%), although there is a significant amount of leakage out of the Borough, most notably to Bluewater (27.73%), but also to Dartford (6.53%).
  - Bluewater is the dominant centre in all other zones, including the other Gravesham zones, with Bluewater having a market share of 34.66% in Zone 6 (Cobham / Shorne) and 45.05% in Zone 7 (Meopham), compared to 7.10% and 8.43% respectively for Gravesend Town Centre.
  - Bluewater has the highest turnover of any retail destination in the PCA, with a *survey derived turnover* of £276.11m at 2022, almost three times higher than the turnover of Gravesend Town Centre (£98.08m)
- 6.50 The turnover of the stores and centres identified through the Household Survey have been derived by applying their market shares to the amount of available expenditure in each zone, based on the projected changes in population and expenditure rates<sup>3</sup>.
- 6.51 With regards to Bluewater, it is important to note that the area to which this figure relates only represents a small proportion of the entire Bluewater Catchment Area. Table A5 of the retail impact assessment submitted in support of the application to extend Bluewater in 2016 (Dartford LPA Ref 16/01207/OUT) confirms that 95% of the turnover of Bluewater is expected to come from a total of 16 study zones. The PCA for this current application includes all of Zone 1, just over half of the post-code sectors in Zone 2, just under half of the postcode sector in Zone 3, and a small area (two postcode sectors) of Zone 8. This equates to approximately 25% of the turnover from Bluewater's 95% Catchment Area. Therefore, based on the

<sup>3</sup> See footnotes to RIA Tables in Appendix 5

results of the latest household survey, Bluewater is expected to have a turnover of at approximately £1,280.08m by 2027, increasing to £1,435.48m by 2032.

## IMPACT ON IN-CENTRE TRADE / TURNOVER

- 6.52 The majority of the proposed retail floorspace will be used for the sale of comparison goods. The majority of trade to any convenience floorspace in the development will largely be driven by those living and working there. In the event that trade is drawn from outside the development, which is expected to be negligible, trade diversion is expected to be from a range of stores, and it would not lead to a significantly adverse impact on any single store or centre. It therefore follows that the convenience floorspace is not a primary function and the turnover created and trade diverted is considered to be de minimis in the context of the defined centres assessed.
- 6.53 In light of the above, the statistical analysis and assessment of trade diversion contained in this section only relates to comparison retail floorspace to be located within Marketplace and Stadium Neighbourhoods. The statistical tables setting out the analysis of the turnover and trade diversion are included at **Appendix 5** and are summarised below. These focus on the potential impact of the development in **2027** and **2032**.

## SUMMARY OF ANTICIPATED IMPACT

- 6.54 The RIA tables contained at Appendix 5 clearly set out the quantitative impact assessment and include all relevant footnotes. A summary of the key outcomes from the tables is set out below.
- 6.55 **Table 1** sets out the population figures for each of the eight zones that comprise the Primary Catchment Area (PCA). This shows that the total population within the PCA is expected to increase from 256,055 in 2022 to 266,24 in 2027 and 279,022 by 2032. Within the Northfleet / Gravesend Zone (Zone 5) the population is expected to increase from 91,330 to 98,663 over the ten-year period.
- 6.56 **Table 2** outlines the comparison and convenience expenditure per capita figures for each Zone and how they are set to grow over between 2022 and 2032. This shows that there is an increase in per capita expenditure in every zone over this period.
- 6.57 **Table 3** sets out the total available expenditure for comparison goods within the PCA, with a deduction made for non-store trading at each year in line with Experian Retail Planner Briefing Note 19. This shows that the total amount of comparison retail expenditure is forecast to increase from £810.95m in 2022 to 934.71m in 2027 and £1,095.35m by 2032.
- 6.58 **Table 4** estimates the turnover of the retail floorspace associated with the Proposed Development. The table separates the proposed turnover based on the maximum floorspace proposed for each of the different use types; retail floorspace turnover (22,500 sq. m), and local services turnover (1,100 sq. m) (not assessed in line with Paragraph 6.16 of this Statement). The turnover has been calculated based on an anticipated sales density of £6,500 per sq. m for the proposed retail uses along Harbourside Walk and within the Stadium Neighbourhood, and £4,000 per sq. m for retail floorspace associated with the local services. The anticipated turnover figure for the main retail comparison retail floorspace is £106.86m.
- 6.59 **Table 5** outlines the total comparison turnover of the identified centres across the PCA prior to the Proposed Development. This is the turnover from the PCA only and does not allow for any inflow of trade. As noted earlier in this section, Bluewater Shopping Centre is the dominant centre within the PCA, followed by Gravesend Town Centre. Gravesend edge and out-of-centre stores also feature highly, which includes many bulky retailers as well as foodstores.

- 6.60 **Table 6** sets out the anticipated turnover of the commitments identified in Section 4 of this Statement, namely Ebbsfleet Central and Eastern Quarry. The turnovers and trade diversion of the commitments is based on the information contained in the retail impact assessment submitted in support of the Ebbsfleet Central planning application. We note that this is based on the anticipated turnover of both proposals from the Survey Area of Ebbsfleet Central, which covers a wider area than the PCA for this application, ensuring that the assessment is fully robust. This assumes that the combined comparison turnover of both developments would be £49.90m at 2022, which no growth rate applied over time as it relates to new floorspace.
- 6.61 **Table 7** sets out the potential impact of both the commitments and the Proposed Development on the comparison turnover at both 2027 and 2032. This is based on 25% of the trade to the Proposed Development coming from outside of the PCA, as agreed with the Council at the pre-application stage, as well as assumptions on the trade draw of the development from across the eight zones. The largest amount of trade is expected to come from Zone 5 (Northfleet / Gravesend), followed by Zone 1 (Dartford) and Zone 2 (Greenhithe / Swanscombe).
- 6.62 It is estimated that the majority of trade diverted to the Proposed Development will have come from Bluewater Shopping Centre (circa £60.72m), given the similar nature of the retail proposed, and the proximity of Bluewater to the Site. The Proposed Development therefore presents a real opportunity for retail spend generated within Gravesham Borough to be retained, rather than being lost outside the Borough.
- 6.63 Approximately £3.76m could be diverted from stores in Gravesend Town Centre. Although located close to the Site, the type of offer in Gravesend with large-format and value-driven key anchors including Primark and B&M, means that there is less opportunity for trade to be diverted. Further, although Gravesend is the dominant centre within Zone 5, its market share is much lower across the other Gravesham zones which have a much lower proportion of expenditure directed towards Gravesend than Bluewater.
- 6.64 Approximately £2.43m could be diverted from stores in Dartford Town Centre. As with Gravesend, Dartford Town Centre is anchored by large-format value-led stores, including Matalan, Primark and Wilko, as well as having a strong Town Centre convenience offer, meaning that opportunities for diversion of trade are limited. However, due to the proximity of Dartford to the Site, it is inevitable that some trade will be diverted.
- 6.65 It is anticipated that trade could also be diverted from a range of stores and centres outside the Catchment Area, including Lakeside Shopping Centre and the retail warehousing at West Thurrock and Tower Retail Park on the edge of Crayford Town Centre, as well as a range of other centres and retail parks within the wider area. However, any diversion of trade will not be at a level that could be considered to be significantly adverse, partially in light of their markedly different catchment areas to the Proposed Development.
- 6.66 **Table 7** confirms that the Proposed Development could have a direct impact on the comparison turnover of Gravesend Town Centre of 3.48% at 2027, decreasing to 3.10% by 2032. This increases to 6.83% and 6.09% respectively once the effect of the commitments has been taken into account. However, the comparison turnover of the centre is still expected to grow by over £15.65m between 2022 and 2032.
- 6.67 There could be a direct impact of 2.56% on the comparison turnover of Dartford Town Centre in 2027, decreasing to 2.29% by 2032. This increases to 6.88% and 6.13% respectively once the effect of the commitments has been taken into account. Again, the comparison turnover of the centre is still expected to grow by £13.53m between 2022 and 2032.
- 6.68 Bluewater Shopping Centre could see a direct impact on its comparison goods turnover of 4.74% in 2027, decreasing to 4.23% by 2032. This increases to 7.08% and 6.32% respectively once the effect of the commitments has been taken into account. The comparison goods turnover is still expected to grow by over £182.26 between 2022 and 2032.
- 6.69 However, the impact tests set out in Paragraph 90 of the NPPF are concerned with the impact on the centre as a whole, not simply a single service type. Therefore, **Table 8** considers the potential impact on Gravesend and Dartford Town Centres,

and Bluewater Shopping Centre as a whole, taking account of both comparison and convenience goods. This is summarised in **Table 6.2** below.

Centre	Total Impact on Centre 2027	Total Impact on Centre 2032	Change in Turnover 2022 – 2027 (in £m)	Change in Turnover 2022 – 2032 (in £m)
Gravesend Town Centre*	3.44%	3.10%	£6.16m	£20.38
Dartford Town Centre*	3.28%	2.99%	£5.57m	£19.08
Bluewater	4..74%	4.25%	£55.62	£214.87

Table 6.2 – Total retail impact of development at 2027 and 2032

\* survey derived turnover / impact only

- 6.70 It is important to note that all of the centres are expected to trade in excess of their pre-development turnover at 2022 turnover by 2027, meaning that any impact from the Proposed Development will only be felt temporarily. Further, at less than 4% for Gravesend and Dartford and less than 5% for Bluewater, the impact of the Proposed Development is not considered to be significantly adverse in the context of these centres.
- 6.71 It is also important to note that the above figures only take account of the *retail turnover* of these centres. Bluewater in particular has a sizable leisure offer, which adds to its total turnover. The turnovers of Gravesend and Dartford also exclude any inflow to these centres, which means that, in reality, the impact on these centres will be lower, particularly for Dartford which is likely to attract trade from the west of the PCA in particular which would not be captured within the survey-derived turnover.
- 6.72 As set out earlier in this Section, all of the centres are performing well, and in fulfil their role in their respective hierarchies. Although there are improvements that could be made to the overall retail and leisure offer, both Dartford and Gravesend Town Centres have both seen their vacancy rate reduce in recent years, and Bluewater continues to perform as one of the top retail and leisure destination in the country, drawing trade from a wide area. Therefore, although trade could be diverted from all of these centres, it will not be to an extent that their overall vitality and viability will be undermined.
- 6.73 Notwithstanding this, it is recognised that Gravesend Town Centre in particular, could benefit from investment, particularly through the redevelopment of the Heritage Quarter area. Further, the closest centre to the Site, The Hive, is allocated for a potential expansion, in line to support additional residential uses proposed to come forward to the north. The impact of the development proposals on the investment potential of these centres is considered below.

## THE IMPACT OF THE PROPOSAL ON EXISTING, COMMITTED AND PLANNED PUBLIC AND PRIVATE INVESTMENT

- 6.74 Paragraph 90 of the NPPF also requires the RIA to consider the potential impact of relevant development proposals on existing, committed and planned public and private investment.
- 6.75 It is clear that the development proposals comprise a significant investment in Gravesham and will help to retain more retail spend within the Borough, creating more sustainable shopping patterns for Gravesham residents. However, it is also important to understand how the development could impact on planned investment within the centres identified.

- 6.76 **The Hive** Local Centre is allocated for an extension to its local retail and service offer to support wider residential development in the area of around 530 dwellings. The residential development itself will create additional expenditure to support the provision of new local shops and services within the extended Local Centre. Further, although located just 0.6km from the edge of the Site, both The Hive and the local service provision within the Proposed Development will serve their own immediate local populations. Therefore, the creation of local provision to meet the residential and office space forming part of the Proposed Development is not expected to affect the potential for The Hive to expand its offer in line with local need in due course.
- 6.77 **The Heritage Quarter** within Gravesend Town Centre is identified as a Key Site in the Core Strategy, capable of accommodating around 10,500 sq. m of mostly comparison floorspace over the Plan Period. However, as set out in Section 5, although part of the site is currently being developed for a residential-led development, there are no clear plans as to how the rest of the site will come forward. However, it should be noted that the residential development on the eastern part of the site will help to drive footfall in the Town Centre as a whole, having an overall positive effect going forward.
- 6.78 We understand that it is the Council's intention for the Heritage Quarter site to now have a more leisure focus, with the provision of a boutique cinema and a number of restaurants, in addition to supporting retail. Therefore, the provision of any additional retail floorspace in this area is likely to be limited, and certainly not of a scale originally foreseen.
- 6.79 In any event, only limited trade diversion from Gravesend is expected, with available turnover to support new floorspace continuing to grow over the Plan Period. Further, given the aspirations for the provisions of a cinema and large floorplate retail units at the Heritage Quarter, the Proposed Development is likely to have little impact on the ability for the Heritage Quarter site to come forward.
- 6.80 The **Northern Gateway Strategic Site** in Dartford is allocated for a mix of mainly residential and employment floorspace, with local shops and leisure facilities designed to meet the needs of the local population only. The development of the site is therefore unlikely to be affected by the limited trade diversion anticipated from Dartford Town Centre.
- 6.81 Although there are a number of vacant units within both Gravesend and Dartford Town Centres, the vacancy rate in both centres has fallen in recent years, demonstrating investor confidence. Although some trade is forecast to be diverted away from Dartford Town Centre, given the different type of offer proposed at Northfleet Harbourside and the intrinsic link between the retail and the other uses at the Site, the impact on the ability for Dartford to continue to grow and prosper is minimal.
- 6.82 The largest of Dartford's Priority Areas is the Ebbsfleet to Stone Priority Area which runs east to west across part of the Borough. The **Ebbsfleet Valley Strategic Site** sits within the Ebbsfleet to Stone Priority Area and is made up of three main sites, Ebbsfleet Central, Eastern Quarry and Ebbsfleet Green. The Site is allocated to deliver up to 10,000 new homes and business district supporting approximately 16,900 new jobs. Retail and leisure facilities will be provided as part of the overall offer, as well as hotels and community uses. The majority of the retail will be designed to meet the day to day needs of the local population, particularly in the Ebbsfleet Green and Northfleet Embankment West areas, where limited retail is proposed.
- 6.83 **Ebbsfleet Central** is an area focused around the Ebbsfleet river valley, with Ebbsfleet International Station forming a central focus for the area. Of the four sites that comprise Ebbsfleet Central, those that sit in Dartford Borough (Station Quarter North and South) form part of the Ebbsfleet Valley Strategic Site and the Ebbsfleet to Stone Priority Area. The Ebbsfleet Central sites located within Gravesham Borough (Springhead and Northfleet Rise) sit within the Ebbsfleet (Gravesham) Opportunity Area.
- 6.84 The aim for Ebbsfleet Central is to create a new centre with a national catchment, one that could be compared to the likes of Kings Cross in central London in terms of function. The area will act as a standalone 'activity hub' with a focus on business, employment, education, medical, community and cultural uses. As stated within the Ebbsfleet Implementation Framework (2017) the aim is to create a new urban heart for Ebbsfleet that is complementary to the offering provided at Dartford and Gravesend Town Centres and Bluewater Regional Shopping Centre. The current application for Ebbsfleet Central proposes

up to 16,125 sq. m net comparison floorspace and 4,031 sq. m net convenience floorspace, as part of a comprehensive mixed-use scheme.

- 6.85 We note that the Study Area for the Ebbsfleet Central application differs to the PCA for this application, extending into Bexley Borough to the west, with much of Gravesend Town Centre sitting just outside of the eastern boundary. Although the majority (70%) of the turnover is expected to come from Ebbsfleet Central's the Study Area, 30% will come from outside.
- 6.86 The proposed retail at Ebbsfleet Central will be designed to support the other uses within the site, namely Ebbsfleet International Station alongside the residential and commercial uses. Further, as modelled in the RIA tables, there is sufficient expenditure in the catchment area to support both proposals. Given the different nature and catchment of the two schemes, alongside the strategic role of Ebbsfleet focussed on the International Station and supporting employment uses, the proposed at Northfleet Harbourside will not have a *significant adverse* effect on the ability for it to come forward as currently envisaged.
- 6.87 **Eastern Quarry** is located to the west of Ebbsfleet Central and comprises a former chalk quarry that includes areas of landscape and waterscape and initial infrastructure to support development. The area is broadly split into three character areas known as Castle Hill, Alkerden and Western Cross. Eastern Quarry is located within the Ebbsfleet Valley Strategic Site and the Ebbsfleet to Stone Priority Area in the Dartford Core Strategy. The area is allocated to deliver up to 6,250 homes supporting up to 120,000 sq. m of office space, up to 26,000 sq. m of retail space and 24,000 sq. m of leisure space, alongside up to 50,000 sq. m of community uses and 11,000 sq. m of hotel space.
- 6.88 The floorspace proposed at Eastern Quarry sites will support the local need created by the proposed residential and education uses, rather than acting as a destination in its own right, and therefore the Proposed Development is unlikely to have any effect of the ability for this floorspace to be developed, and certainly not to an extent which could be considered to be *significantly adverse*.
- 6.89 As noted in this Section, the majority of trade diverted to the Proposed Development is expected to come from Bluewater Shopping Centre, with a smaller amount from Gravesend and Dartford Town Centres, as well as other stores and centres both inside and outside of the PCA. It will therefore not affect the ability for the various sites at Ebbsfleet to come forward for retail development, which is intrinsically linked to the wider regeneration of this area and the supporting residential, education and office uses.
- 6.90 The Dartford Core Strategy sets a guideline figure for additional retail floorspace provision at **Bluewater Shopping Centre** of 5,000 sq. m up to the year 2016, and planning permission has been granted for a comprehensive extension to include additional retail and leisure floorspace (LPA Ref. DA/16/01207/OUT and 19/01296/REM (the extension permission)). We understand that the permission has been implemented and that part of the extension has been constructed. However, it is not clear exactly whether the remaining floorspace approved under the extension permission will come forward, and in what form.
- 6.91 In any event, the Proposed Development will have no effect on the ability for the additional floorspace to be come forward at Bluewater in its approved form. The Retail Assessment submitted in support of the Bluewater application confirmed that the development as could have a comparison goods turnover of £172,460m<sup>4</sup>, part of which has already been developed. Table 7 of **Appendix 5** of this Statement confirms that the turnover of Bluewater is expected to grow by over £182.26m between 2022 and 2032, more than enough to support the level of floorspace allowed through the Dartford Core Strategy and as approved under the extension permission. The development will therefore not lead to a *significant adverse impact* on Bluewater.

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<sup>4</sup> Table 7.3 of Retail Impact Assessment for Permission Ref. DA/16/01207/OUT

## SUMMARY OF RETAIL IMPACT ASSESSMENT

- 6.92 In this Section we have considered the potential impact of the development on the designated centres within PCA, most notably Gravesend and Dartford Town Centres, as well as The Hive Local Centre, Bluewater Shopping Centre, and the planned developments at Ebbsfleet Central, Eastern Quarry.
- 6.93 The majority of trade diverted to the Proposed Development is likely to come from Bluewater, given the similar type of retail development proposed. However, trade will also be diverted from both Gravesend and Dartford, as well as other stores and centres, both within and outside of the PCA. However, the anticipated trade diversion will not be at level that could be considered to be *significantly adverse*, and all of the above centres will be trading well in excess of their 2022 turnover at both the Design Year of 2027 and the Horizon Year of 2032.
- 6.94 Although comparison goods retailing is a key activity in all of the centres, they all accommodate a range of other uses which means that they can be expected to continue to thrive despite the trade diversion. Both Gravesend and Dartford accommodate a range of civic uses, including being the administrative centres for each local authority area.
- 6.95 In terms of Bluewater Shopping Centre, given its strategic nature and that it covers such a large catchment area, it generates a very high turnover which is expected to reach approximately £1,280.08m by 2027, increasing to £1,435.48m by 2032. As such, it is expected that Bluewater will generate enough expenditure to be able to support both the proposed extension and the proposed development, even if the remainder of the proposed extension is to come forward in its entirety. Bluewater also has an extensive leisure offer, including a cinema, a trampoline park, a zip-wire, as well as other regular temporary leisure activities. All of these additional uses, combined with the forecast growth in expenditure, notwithstanding the diversion of trade to the Proposed Development, reinforce the conclusion that the impacts on viability and vitality identified in this section will not be significantly adverse.
- 6.96 With regard to the impact of the Proposed Development on public and private investment, it is clear that the retail floorspace proposed in the Eastern Central and Eastern Quarry Sites are integral to the wider regeneration of these areas and will support the local need created by the proposed residential and education uses, rather than acting as destinations in their own right. The impact of the Proposed Development on any existing or forthcoming retail provision in these areas is therefore likely to be very limited.
- 6.97 On the basis of the above, it has been demonstrated that the Proposed Development will not result in a significant adverse impact on the vitality and viability of any defined retail centre, or on any planned public or private investments. As such, it follows that the proposals accord with Paragraph 90 of the NPPF and Policy CS08 of the Gravesham Core Strategy Local Plan.

# 7.0 THE LEISURE ASSESSMENT

- 7.1 This section of the Statement considers the impact of the F&B (leisure) uses proposed as part of the development. This builds upon the retail impact assessment contained at Section 6 to identify what effect the proposed F&B uses could have on the centres within the Primary Catchment Area.

## NATURE OF PROPOSED F&B OFFER

- 7.2 The application proposes up to 9,500sq. m of F&B floorspace. The proposed offer will be spread across the Site within a number of the neighbourhood areas. Up to 1,000 sq. m of this will be located in the Marketplace Neighbourhood, with a further 4,000 sq. m located within the Boulevard, and 2,500sq. m within the Stadium Neighbourhood.
- 7.3 Up to 2,000 sq. m of the 9,500 sq. m of F&B floorspace could be provided within the Riverside Neighbourhood. The design code for this area seeks to create a new residential community, and the proposed F&B floorspace will cater predominantly for those living within the immediate area, within small to mid-scale units. The F&B offer in this Neighbourhood will also include a unique waterfront experience on the top floor of the buildings, with views over the River Thames. While the majority of users of this area are expected to come from the immediate area, trade is also expected to be drawn from the wider Northfleet / Gravesham area as well, as well as those visiting the site for retail and stadium-related uses.
- 7.4 Up to 4,000 sq. m of F&B floor space will be provided in the Boulevard Neighbourhood. The Boulevard forms the primary access from Stonebridge Road, into the heart of the Proposed Development. As well as providing homes, the surrounding buildings house a hotel, offices and a community and business incubator hub. The F&B offer contained in this area will be located in larger units, on the ground floor of the residential, hotel and office space. It will mainly cater for those living and working in the immediate area. Although some trade is also expected to be drawn from beyond, its primary function will be to meet the needs of those living and working within the Northfleet Harbourside development.
- 7.5 Up to 2,500 sq. m of F&B floorspace will be centred around the entrance to the Stadium within the Stadium Neighbourhood. This will predominantly cater for visitors to the stadium and well as the retail uses within the Marketplace Neighbourhood Area. The offer in this area will comprise a mix of small and medium size units. It is anticipated that most of the trade will be intrinsically linked to the use of the stadium and the retail offer.
- 7.6 Up to 1,000 sq. m of floorspace will also be provided within the Marketplace, predominantly in small-scale units to support the comparison retail offer. The trade draw patterns of the F&B offer are expected to broadly follow that of the proposed retail floorspace in this area, due to its ancillary role to the main retail use.
- 7.7 The majority of the floorspace will therefore be for the day to day needs of the living and working either in or close to the Site, with the rest predominantly meeting the needs of those already using the Site for leisure and shopping purposes.
- 7.8 Of the 9,500 sq. m of floorspace proposed across the Site, there will be a mix of daytime focussed coffee shops and cafes, evening restaurants, as well as a fast-food / grab-and-go type offer, to meet the needs all the different types of users of the development. Although there is likely to be a mix of national operators and local independents, the focus is likely to be on national operators, which are generally underrepresented within Gravesham.

## LEISURE IMPACT ASSESSMENT

- 7.9 As noted in Sections 3 and 6 of this Statement, **Paragraph 90** of the NPPF states that when assessing applications for main town centre uses outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. If there is no locally set threshold, the national default threshold is 2,500 sq. m. Given that F&B uses are classed as a 'main town centre use', within the NPPF, this means that an assessment of the potential impact is required by the NPPF.
- 7.10 The NPPF requires an assessment to be undertaken of potential impacts upon town centre vitality and viability, including local consumer choice and trade in the town centre and wider retail catchment, as well as the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal.
- 7.11 The PPG confirms that a judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances. Where evidence shows that there would be no likely significant impact on a town centre from an edge of centre or out of centre proposal, the local planning authority must then consider all other material considerations in determining the application, as it would for any other development.
- 7.12 As with the retail impact assessment contained in Section 6, the leisure impact assessment associated with the F&B uses should focus on the following centres, being the centres which the Proposed Development is likely to have the most impact upon:
- Gravesend Town Centre
  - Dartford Town Centre
  - The Hive Local Centre
  - Bluewater Regional Shopping Centre
- 7.13 The Health Checks contained at **Appendices 6-9** of this Statement, and summarised in Section 6, provide an overview of the type of F&B offer found. In this section, we assess the potential impact on the existing F&B offer in these locations, and whether any diversion of trade could affect the ability for new development to come forward. We also consider the potential impact on the planned developments at Eastern Quarry and Ebbsfleet Central.
- 7.14 In undertaking the assessment, it is important to note that much of the F&B trade will be linked to residents of the new development, those occupying the office space, visitors to the football stadium, and those visiting the retail in the Marketplace Neighbourhood. Although it is inevitable that some residents will use the F&B offer in isolation, most notably those on the riverfront, and any restaurants which are open into the evening, the majority of the day time trade is expected to come from those already using the Site.
- 7.15 It is also important to understand the current market shares of restaurants in Gravesham. The Household Survey undertaken in support of this application confirms that Gravesend Town Centre retains around 41% of the trade for evening restaurants from the Northfleet / Gravesend Zone (Zone 5). However, it is important to note that 31% of evening trade from Zone 5 is leaked to Bluewater Shopping Centre.
- 7.16 The retention within Gravesend falls considerably for the other two Gravesham Zones with 15.4% of residents using Gravesend Town Centre for evening dining, compared to 21.94% for Bluewater within Zone 6. Within Zone 7 the figures are 11.6% and 17.44% respectively. The Proposed Development therefore provides a real opportunity to retain evening dining spend within the Borough.

- 7.17 In assessing the potential impact of the proposed F&B floorspace, we consider how the offer proposed as part of the Proposed Development will differ from the offer in the locations set out above,

## GRAVESEND AND DARTFORD TOWN CENTRES

- 7.18 Town centres, including Gravesend and Dartford, generally have an allure for the F&B sector which is very different and distinct to out-of-centre and purpose-built locations. Importantly, there are some operators which would consider town centre locations but would not contemplate an out-of-centre opportunity. Town centres tend to be more architecturally rich and provide interesting and differing buildings which cannot be replicated on new, purpose-built developments. Restaurant and bars are very 'at home' with older and listed buildings and indeed many operators insist on buildings with character as part of their acquisition programme.
- 7.19 Town Centres also have more of a cultural dimension with museums, theatres and music halls; all forums that need to be readily supported by a good F&B offering. This is true of both Gravesend and Dartford, both of which have a theatre, as well as Bluewater Shopping Centre, with the F&B offer supporting the other leisure uses and extensive retail offer.
- 7.20 Both Gravesend and Dartford Town Centres have a core office worker audience that needs a good grab and go / grab and stay lunch time offer, places for expense entertaining and drinks/food after work. Town Centres also hold very much more allure for the independent operators which gives rise to thriving enclaves and diversity.
- 7.21 Further, while both Dartford and Gravesend Town Centre accommodate a wide range of independent restaurants, there is a clear lack of national chain restaurants, particularly within the evening dining sector, with most occupiers choosing to locate at Bluewater instead, as demonstrated by the results of the Household Survey. Therefore, there will be little impact on either Gravesend or Dartford Town Centres for residents who chose to visit independent restaurants, or who may combine a trip to a restaurant with another evening activity, such as the theatre, pub, or club.
- 7.22 We understand from the that the latest plans for the Heritage Quarter in Gravesend could include a boutique cinema and supporting restaurant uses<sup>5</sup>, although these plans are not yet fixed. The restaurants will form part a leisure destination within Gravesend, intrinsically linked to the cinema use, providing a type of leisure offer which is currently not found within the Town Centre. Although some F&B trade could be diverted to Northfleet Harbourside, the type of leisure offer is different to that proposed at the Heritage Quarter, and crucially, while the Northfleet Harbourside development seeks to provide a multi-functional amphitheatre space, which could include outdoor cinema events, it will not include the provision of a traditional cinema. Therefore, any diversion of trade which could impact the ability for a leisure development to come forward in the Heritage Quarter is therefore likely to be limited.
- 7.23 We are not aware of any planned development within Dartford Town Centre which is predicated on the provision of additional F&B floorspace. In any event, the proposed F&B floorspace is unlikely to have a significant impact on the ability for additional F&B floorspace to come forward in the future, to support the existing retail cultural and office uses within the Town Centre, due to the limited diversion of trade expected from the Town Centre.
- 7.24 Although some trade could be diverted from Dartford and Gravesend Town Centres to the F&B offer within the Proposed Development, taking account of the above, it is unlikely to be to an extent which would be considered to be *significantly adverse*.

## THE HIVE LOCAL CENTRE

- 7.25 Due to the scale of the centre, the Hive does not offer a comprehensive F&B offer, with just a single take-away unit. The Proposed Development will therefore not have an impact on The Hive. Further, given the local need that The Hive is

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<sup>5</sup> [www.gravesend-town-centre-regen-com](http://www.gravesend-town-centre-regen-com)

designed to meet, the Proposed Development will also not have an impact on the ability for F&B uses to be included within the planned extension of the centre.

## BLUEWATER SHOPPING CENTRE

- 7.26 As noted above, much of the day-time trade to the F&B offer is expected to be linked to the other uses on the Site namely the residential, office, stadium and retail uses. Given that much of the retail trade is expected to be diverted from Bluewater, it follows that trade to the F&B offer in the Marketplace Neighbourhood, including coffee shops and a grab-and-go offer will also be diverted from Bluewater. However, as with the retail offer, this diversion of trade will not be to an extent that the vitality and viability of Bluewater will be significantly adversely impacted.
- 7.27 Where trade to the F&B offer is not linked to the other uses and the Site, and comprises a visit simply for that purpose, for example an evening meal, the majority of trade is expected to be diverted from Bluewater due to the similar type of offer at the two locations. However, this diversion of trade will be focussed on the PCA, including residents of Gravesham who currently visit Bluewater for evening dining, due to the lack of national operators within the Borough. This only represents a small part of the wider Bluewater catchment, which will be largely unaffected. Further, visitors to the F&B offer in Bluewater have the opportunity to link a trip to another use, including the cinema or other leisure uses, meaning that these trips will also be unaffected.
- 7.28 Therefore, although trade is expected to be diverted from Bluewater, particularly linked to the food-only trips from residents of Gravesham Borough, as well as the trips linked to the retail diversion considered in Section 6, given the scale of the offer at Bluewater, both in terms of its retail and leisure uses, as well as its extensive catchment area, the potential diversion of trade to the Proposed Development could not be at a level which could be considered to be *significantly adverse*
- 7.29 The proposed extension of Bluewater Shopping Centre includes the provision of additional of F&B floorspace. However, of the 30,000 sq. m of net additional floorspace, only 1,500 sq. m is likely to be for F&B uses. The F&B offer is therefore very much ancillary to the main comparison goods floorspace. Even if some trade is diverted from the F&B offer, from only a part of the wider Bluewater catchment, it is not expected that there will be a significant effect on the ability for the extension as a whole to come forward.

## EASTERN QUARRY AND EBBSFLEET CENTRAL

- 7.30 We understand that some food and beverage offer will be provided at Eastern Quarry and Ebbsfleet Central. However, given the limited floorspace proposed, it is likely that it will only perform an ancillary role in both locations designed to support the wider uses at these sites. It will therefore not be affected by the proposed F&B offer at the Proposed Development.
- 7.31 This is demonstrated by the planned development at Ebbsfleet Central, which includes the provision of a maximum total of 21,500 sqm GIA retail floorspace, including Class E(b) uses (e.g. food and beverage outlets) as well as Class E(a). The Retail Assessment submitted in support of the application assumes that the remaining 15% (or more) could come forward under Class E(b) and/or F2(a). It is clear that the proposed F&B floorspace will therefore be ancillary to the other uses at the Site, and the development as a whole is not predicated on these uses coming forward. Notwithstanding this, the scale of F&B proposed at the site means that it will largely meet the day-to-day needs of those living, visiting and working in the Ebbsfleet Central area, meaning that there will be little opportunity of diversion of trade to Northfleet Harbourside.
- 7.32 The Proposed Development will therefore not lead to a significant impact on the ability of the two Ebbsfleet sites to come forward as planned.

## CONCLUSIONS ON LEISURE IMPACT

- 7.33 In this section, we have considered the potential impact of the proposed F&B offer on the centres identified above, as well as the planned developments at Eastern Quarry and Ebbsfleet Central. In doing so, we conclude that the nature of the proposed F&B offer and its primary purpose is to meet the needs of those either living or working at the Site, or already visiting for leisure and retail purposes. Although some trade could be diverted from existing F&B offer in the PCA, particularly from Bluewater, this will not be to an extent which will result which will lead to a significant adverse impact on wither current trade or planned investment.
- 7.34 Taking account of the above, we conclude that this element of the development will therefore not lead to a significant adverse impact on any identified centres / sites considered above.

# 8.0 SUMMARY AND CONCLUSIONS

- 8.1 This Retail and Leisure Statement has been prepared in support of an application for that seeks outline planning permission for the redevelopment and regeneration of the site known as Northfleet Harbourside to create a vibrant mixed-use development delivering new sporting facilities for Ebbsfleet United FC, new homes, retail, community and office uses, as well as extensive areas of public realm and improved pedestrian and cycle connections.
- 8.2 The retail floorspace proposed as part of the Proposed Development is a key part of the overall masterplan allowing the delivery of the stadium to come forward and will provide a diverse programme of retail accommodation. The retail units will typically be small scale comparison led, with small scale convenience retail to support the day to day needs of those living and working at the Site. The retail provision in this area will be predominately of small 'high-street' form units to complement the wider uses proposed at the Site, and to provide a type of retail offer currently not found within the Borough of Gravesham.
- 8.3 The F&B offer proposed as part of the development will predominantly focus on meeting the day-to-day needs of those working and living within the development. The F&B offer has not been designed to act as a destination but is rather intended to support the other retail and leisure uses.
- 8.4 Given the location of the application site in the wider context, this Retail and Leisure Statement has assessed the impact of the Proposed Development on Gravesend and Dartford Town Centres, The Hive Local Centre, Bluewater Shopping Centre and the planned developments at Eastern Quarry and Ebbsfleet Central. It has also considered whether any more sequentially preferable sites are available and suitable to accommodate the proposals.
- 8.5 The sequential assessment undertaken in support of this application concludes that the application site is the most sequentially preferable site to accommodate the Proposed Development, and therefore accords with Policy CS08 of the adopted Core Strategy and Paragraph 87 of the NPPF.
- 8.6 The retail impact assessment undertaken in support of this application concludes that the Proposed Development will not result in a significant adverse impact on the vitality and viability of any defined retail centre, or any planned public or private investments. The largest impact will be on Bluewater Shopping Centre, which, although recognised as a retail destination within the Dartford hierarchy of centres, is not an allocated town centre. In any event, the diversion of trade from Bluewater will not be at a level which could be considered to be *significantly adverse* and will not have an effect on any planned future expansion. The Proposed Development is therefore considered to satisfy the requirements of the impact test and it follows that the proposals accord with Paragraph 90 of the NPPF.
- 8.7 The leisure impact assessment concludes that the proposed F&B offer's primary purpose will be to meet needs of those either living or working at the Site, or already visiting for leisure and retail purposes. Although trade could be diverted from existing provision within the PCA, it will not be to an extent which will lead to a significant adverse impact on any identified centre or planned development.
- 8.8 This Statement has considered the acceptability of the proposal against the relevant town centre policies contained in the NPPF and in local Development Plan policy, and concludes the following:
- Notwithstanding the out-of-centre location of the site, the sequential assessment concludes that there are no sequentially preferable sites within or on the edge of either Gravesend or Dartford Town Centres capable of accommodating the development as a whole, and the application site is therefore the most sequentially preferable location;

- The proposal will not lead to a significant adverse impact on the performance and vitality and viability of any designated centre either within or outside the Primary Catchment Area; and
- The Proposed Development will not impact on the ability for planned and committed investment to come forward within the Primary Catchment Area, including the development of the Heritage Quarter in Gravesend, the planned expansion of Bluewater and the continuing development of Ebbsfleet, including Ebbsfleet Central and Eastern Quarry.

8.9 Accordingly, we conclude that the application fully accords with both national and local retail planning policy and should therefore be considered favourably by the Council.

# APPENDIX 1.0

# RETAIL SCOPING REPORT

Gravesham Borough Council

# NORTHFLEET HARBOURSIDE

## RETAIL SCOPING REPORT

21 JULY 2022



# THIS IS THE CONTENTS

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Gravesham Borough Council

# 1.0 INTRODUCTION

## INTRODUCTION

- 1.1 This Retail Scoping Report has been prepared ahead of an application for outline planning permission for a mixed-use development in Northfleet, Kent, known as Northfleet Harbourside.
- 1.2 Northfleet Central 1 Ltd ('The Applicant') is seeking to redevelop Northfleet Harbourside ('the Site'), an area covering approximately 45 acres, with direct frontage to the River Thames. The Site is currently occupied by mix of uses, including industrial, including an aggregates depot, small-scale retail and leisure units, some residential and a football stadium.
- 1.3 This Retail Scoping Report sets out the key assumptions that will be used within the retail assessment to support the application. These relate to both the potential effect of the development proposals on the trading patterns within the Primary Catchment Area (Impact), and whether there are any allocated or more centrally located sites that could accommodate the development (Sequential Test).
- 1.4 The Site falls within the Northfleet Embankment & Swanscombe Peninsular East Opportunity Area, as allocated in the Gravesham Borough Core Strategy (2014). The Site incorporates part of sub-areas 1.2 and 1.3 of the wider Opportunity Area, neither of which contain any policy support for additional retail floorspace.
- 1.5 The edge of the Site is located approximately 700m from the edge of Hive Road Local Centre in Northfleet and 3.2km from the edge of Primary Shopping Area of Gravesend Town Centre. The entire site is therefore located in an out-of-centre location in policy terms and does not contain a policy designation for additional retail uses.

## THE PROPOSED DEVELOPMENT

- 1.6 The development proposals involve a comprehensive redevelopment of the Site, which will see Ebbsfleet United Football Club's ground be relocated at the heart of the new development. The proposed scheme seeks to deliver 3,500 new homes, new retail and employment space and new leisure opportunities. These will create three mixed use neighbourhoods, taking advantage of the new open space that is to be created and frontage to the River Thames.
- 1.7 The working Description of Development is as follows:

*Demolition of the existing buildings and the phased redevelopment of the site for a mixed use scheme comprising a multi-purpose leisure centre (sui generis), commercial and business uses (Class E), residential dwellings (Class C3), new public square and new public realm with hard and soft landscaping, highways works, parking, access and servicing arrangements, and associated works.*
- 1.8 A copy of the Site Location Plan is attached at **Appendix 1**.
- 1.9 Approximately 32,000 sq. m of retail and food and beverage floorspace is proposed across the Site, alongside circa 9,000 sq. m of local community uses and local services, including facilities such as hairdressers and banks, small scale medical and health services, a nursery and health and fitness facilities.
- 1.10 The majority of the retail uses will be focussed within the Marketplace Character Area, focussed along a pedestrianised walkway on the western side of the new stadium, known as Harbourside Walk. The Food and Beverage (F&B) offer will be

focussed along the eastern and southern sides of the stadium. The units will typically be small in scale, ranging in size from around 100 sq. m, up to circa 500 sq. m in size. It is anticipated that the retail will be comparison-led, although there will be elements of small-scale convenience retail. The retail provision in this area will be predominately of a 'high-street' format, including middle -market retail to complement the leisure destination focussed on the new stadium.

- 1.11 A copy of the current draft layout for the retail and associated uses are contained at **Appendix 2** of this Report.
- 1.12 There will be additional pockets of retail and F&B across the Site, supporting the proposed residential and office uses, including within the Riverside and Riverside Waterfront areas, adjacent to the Thames. These uses will be contained within small-scale units.
- 1.13 The breakdown of proposed town centre uses and their location within the Site are as follows:
- Retail (Marketplace) – 22,500 sq. m
  - Food and Beverage (Riverside, Marketplace, Boulevard and Stadium) – 9,500 sq. m
  - Local Services, e.g. hairdressers, banks (Parkland and Marketplace) - 1,100 sq. m
  - Indoor Sport, Recreation and Fitness (Riverside, Parkland, Marketplace, and Boulevard) – 1,200 sq. m
  - Medical or Health Services (Riverside, Parkland, and Boulevard) – 1,500 sq. m
  - Creche or Nursery (Riverside, Parkland, Marketplace, and Boulevard) – 1,200 sq. m
  - Local Community Uses (Marketplace) – 4,000 sq. m
- 1.14 The proposed local amenity and community uses will provide a mix of uses. These will include those falling within Class E, such as small-scale retail, professional services and retail businesses, and might include, but limited to, café's, barbers, essential services, bakers, delis, grocers, medical and health services and a crèche.
- 1.15 The end occupiers of the retail units are not known at this stage. The application will therefore seek to apply for a flexible Class E use across the entire retail floorspace proposed at the Site, with a maximum for areas for each use clearly set out within the application. Given that the local service floorspace to be provided across the Site will provide a mix of uses, a ratio of 50% retail floorspace under Class E(a) will be applied for the purposes of the retail assessment.
- 1.16 The proposed retail will not only deliver the needs of the local community, realising local retail based essential services, but provide a destination retail offer, and complement the redeveloped and realigned football stadium, creating a unique flagship leisure destination. It will also meet the essential day-to-day needs of the new residents of the scheme, existing residents of the wider Northfleet area, as well as supporting the employment floorspace proposed as part of the development.
- 1.17 Notwithstanding this, given that the Site is located out-of-centre, and in line with Paragraphs 87-91 of the National Planning Policy Framework (NPPF) and Gravesham Local Core Strategy Policy CS08, both a Retail Impact Assessment (RIA) and Sequential Assessment are required to support the planning application.

# 2.0 STUDY AREA AND HOUSEHOLD SURVEY

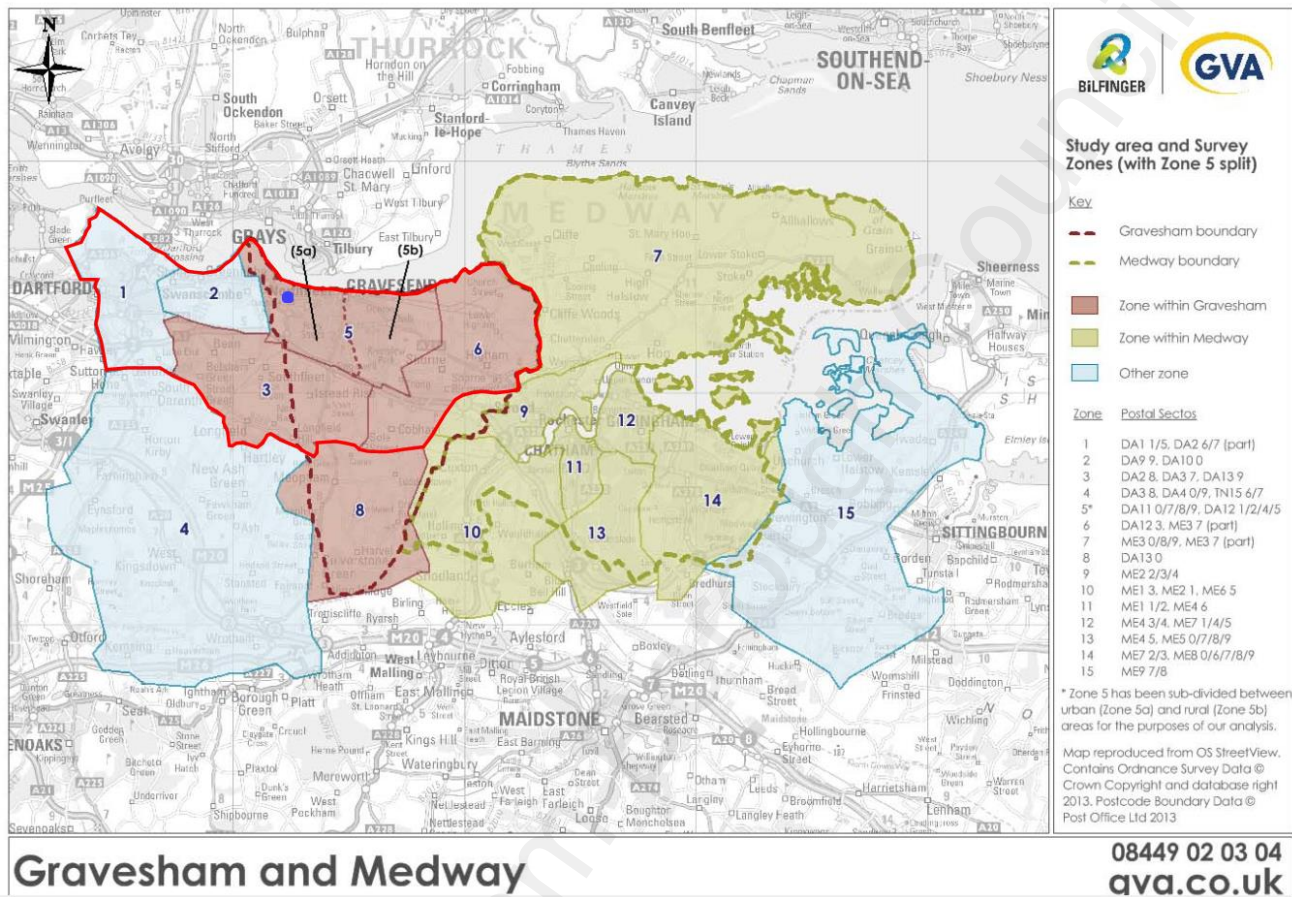
## INTRODUCTION

- 2.1 In this Section, we set out the scope of the Study Area and baseline data on shopping habits upon which the Retail Assessment to support the outline planning application will be based.
- 2.2 We understand that the most recent Retail Study for Gravesham is the November 2016 North Kent SHENA Retail and Commercial Leisure Assessment ('the 2016 Retail Study'), which was commissioned jointly between Gravesham and Medway Councils. Although a subsequent Background Paper was produced to support the Regulation 18 Stage 2 consultation of the Gravesham Local Plan was produced in 2020, the 2016 Retail Assessment is the most up-to-date document in terms of a comprehensive Retail Study. This will therefore form the basis of the assessment.
- 2.3 Given that the 2016 Retail Study is now almost six years old, it will be necessary to update the information in shopping patterns, as set out in more detail below.

## THE STUDY AREA

- 2.4 The proposed retail and other Class E floorspace within the development has been designed to meet the needs of both the immediate local residents within Northfleet, as well as those living within the wider area through the creation of a new leisure destination, to support the stadium's improvement as a multi-event stadium. The anticipated catchment population will therefore be a mix of those living within or close to the Site, as well as the wider Gravesham Area and beyond.
- 2.5 Having reviewed the Study Area from the 2016 Retail Study, it has been determined that the Primary Catchment Area (PCA) will broadly encompass the same area as Zones 1, 2, 3, 5 and 6. This includes the northern part of Gravesham Borough, excluding rural area to the south of Sole Steet. It also includes the area immediately to the west, including Dartford Town Centre and Swanscombe.
- 2.6 The relevant postcode sectors for each Zone are as follows:
- Zone 1 – DA1 1/5, DA2 6/7 (part)
  - Zone 2 – DA9 9, DA10.0
  - Zone 3 – DA2 8, DA3, 7, DA13,9
  - Zone 5 – DA11 0//7/8/9, DA12 1/2/4/5
  - Zone 6 – DA12 3, ME3, 7 (part)

2.7 The extent of the anticipated PCA is set out in red on the plan below from the 2016 Retail Study, with the application site marked in blue.



2.8 This is the area from which most, but not all of the trade to the development is expected to be drawn from. Given the nature of the proposals and the links with the stadium use, it is expected that approximately 75% of trade will be drawn from this PCA.

## HOUSEHOLD SURVEY

- 2.9 To inform the retail assessment, a new Household Survey will be commissioned in order to get an up-to-date understanding of the current shopping patterns within the PCA. This will be commissioned through NEMS, who undertook the survey for the 2016 Retail Study.
- 2.10 The Survey will comprise a total of 500 questionnaire across the five zones, with 100 questionnaires per zone. The number of questionnaires per zone has been recommended by NEMS and is considered to be statistically accurate.
- 2.11 The format of the proposed questions will follow those used for the 2016 Retail Study as much as possible, to allow for a direct comparison of how shopping patterns have changes over time. The full list of questions to be included within the questionnaires are set out below.

1. In which shop or town/local centre do you do most of your household's main food shopping?
  - a. Which retailer do you purchase your food internet / home delivery shopping from most often?
2. How do you normally travel to (STORE MENTIONED AT Q01)?
3. Apart from the (STORE / CENTRE MENTIONED AT Q01), is there any other store or centre that you use regularly to do a main food shop?
  - a. Which online retailer is that?
4. Where do you do most of your household's small scale 'top-up' food shopping?
5. Where do you usually do most of your household's shopping for clothes, footwear and other fashion goods?
  - a. Which internet / home delivery retailer do you use most often for your household's shopping for clothing, footwear and other fashion goods?
6. Where else do you do your household's shopping for clothes, footwear and other fashion goods?
  - a. Which other internet / home delivery retailer do you use most often for your household's shopping for clothing, footwear and other fashion goods? (If internet please state.)
7. Where do you do most of your household's shopping for furniture, floor coverings and household textiles?
  - a. Which internet / home delivery retailer do you use most often for your household's shopping for furniture, floor coverings and household textiles? (If internet please state.)
8. Where do you do most of your household's shopping for DIY and decorating goods?
  - a. Which internet / home delivery retailer do you use most often for your household's shopping for DIY and decorating goods?
9. Where do you do most of your household's shopping for domestic appliances such as washing machines, fridges cookers and kettles?
  - a. Which internet / home delivery retailer do you use most often for your household's shopping for domestic appliances such as washing machines, fridges, cookers and kettles?
10. Where do you do most of your household's shopping for TV, Hi-Fi, Radio, photographic and computer equipment?
11. At which centre or store do you do most of your household's shopping on goods for personal care, such as soaps, beauty products, medical goods?
12. At which centre or store do you do most of your household's shopping on goods for recreational and luxury goods including books, games, sports, pets and pet products, bicycles, jewellery?
13. Which of the following centres do you visit most often? (list to be provided)
14. How often do you shop in (CENTRE MENTIONED AT Q13)?
15. What is usually the main purpose of your trip to (CENTRE MENTIONED AT Q13)?
16. Why else do you visit (CENTRE MENTIONED AT Q13)?
17. How often do you visit (CENTRE MENTIONED AT Q13)?

18. What do you like about (CENTRE MENTIONED AT Q13)?
19. What do you dislike about (CENTRE MENTIONED AT Q13)?
20. How do you think (CENTRE MENTIONED AT Q13) Town Centre could be improved?
21. Where do you most often visit for small scale / local and independent retailers and services?
22. Where do you most often visit for markets / pop-up events?
23. Do you take part in any of the following leisure or cultural activities? (list to be provided)
24. What town centre do you visit most often for daytime cafes / restaurants?
25. What town centre do you visit most often for evening restaurants?
26. What town centre do you visit most often for pubs/clubs?
27. Where do you go most often to visit children soft play venues?
28. Which entertainment venues do you visit most often?
29. Where do you go most often to visit health & fitness clubs?
30. Where do you go most often for musical performances / theatres / museums / art galleries?
31. Where do you most often hire community space (for evens, children's parties etc.)?

2.12 We welcome the Council's comments on both the extent of the Primary Catchment Area and the list of questions for the Household Survey.

# 3.0 BASELINE DATA

3.1 In this section, we set out the baseline data and data sources which will be used to underpin the outcome of the retail impact assessment.

## BASE AND ASSESSMENT YEARS

3.2 The Base year for the retail impact assessment will be 2022, being the year the planning application is submitted.

3.3 The Assessment year will be 2027, being five years following the submission of the application, and the first full year of trading, where the greatest impacts are likely to be felt.

3.4 The Horizon Year will be 2032, being ten years following the submission of the application, and allowing sufficient time for changes to shopping patterns to stabilise.

## PRICE BASE

3.5 The price base for the impact assessment will be 2018, in line with the latest figures from the Experian Retail Planner Briefing Note 19 (January 2022).

## POPULATION AND POPULATION GROWTH ESTIMATES

3.6 Population and population growth estimates will be taken from the 2016 Retail Study, which provides population growth estimates up to 2037, beyond the Horizon assessment year.

## EXPENDITURE ESTIMATES AND GROWTH

3.7 The 2022 expenditure rates for comparison and convenience goods will be provided by Experian for the survey zones identified in Section 2. These will be grown in line with the latest Experian figures as set out in Table 1a of the Retail Planner Briefing Note 19.

## SPECIAL FORMS OF TRADING

3.8 A deduction for Special Forms of Trading will be made at the Base, Assessment and Horizon years, in line with the figures set out in Appendix 3 of the Experian Retail Planner Briefing Note 19.

## PROPOSED TURNOVER / SALES DENSITIES

3.9 The anticipated sales densities for the proposed retail floorspace associated with the development will be split as follows:

- Retail uses along Harbourside Walk - £6,500 per sq. m
- Other local / community retail uses - £4,000 per sq. m

3.10 All units will assume to have a net sales area of 80% of the GIA area.

### **SALES EFFICIENCIES**

3.11 As the proposed development is for new floorspace, the assessment will not consider sales efficiencies of the proposed floorspace. There is no justification or evidence to suggest that sales efficiencies of the newly built floorspace will increase on a year-by-year basis in the short term

### **COMMITMENTS**

3.12 We would welcome the Council's input on planning permissions within the Borough for new retail and leisure proposals, which have been granted planning permission but have not yet opened, and would therefore not be included within the results of the Household Survey

3.13 This will be complemented with a review of recent planning permissions from both Gravesham and Dartford Borough's online planning systems.

### **EXPENDITURE INFLOW FROM OUTSIDE CATCHMENT AREA**

3.14 As noted in Section 2, it is anticipated that 75% of the turnover of the proposed retail floorspace will come from within the Primary Shopping Area, resulting in an inflow of around 25%.

3.15 Please note that this figure will only apply to the retail units focussed along Harbourside Walk, forming part of the wider leisure destination. It is anticipated that the community and local amenity uses are likely to have a much higher proportion of their expenditure generated from within the PCA, at around 95%.

3.16 The reason for 25% of the turnover of the retail uses focussed along Harbourside Walk, is that while the vast majority of the regular users of the retail will come from the PCA, the very nature of the of the football stadium, whether it be for football matches or other live events, means that inevitably trade will be drawn from a much wider area. For trips associated with the football use, this could be from right across the Country as a whole.

3.17 It is therefore realistic to assume that up to 25% of the turnover of these retail units could come from 'elsewhere'. The diversion of trade is likely to come from a wide range of existing stores and centres across a large geographical area, meaning that the impact on any single centre as a result of this diversion would be negligible.

# 4.0 TOWN CENTRE HEALTH CHECKS

- 4.1 The retail impact assessment (RIA) will consider the potential impact of the development on all stores and centres upon which it could have an impact, including those outside of the PCA. These impacts will be assessed within a series of RIA tables and will be based on the baseline assumptions set out in Sections 2 and 3 above.
- 4.2 The RIA will also include Town Centre Health Checks, which will consider how any diversion of trade from these centres could affect their overall vitality and viability. This is essential to understand whether any impacts identified in the RIA tables could lead to an impact that would be considered 'significantly adverse' in the context of the individual centre.
- 4.3 Health Checks will be undertaken for the following centres:
- Gravesend Town Centre
  - Dartford Town Centre
- 4.4 Although not a designated Town Centre, a Health Check will also be undertaken on Bluewater Shopping Centre within Dartford Borough.
- 4.5 We welcome the Council's view on whether any other centres should also be assessed.
- 4.6 As advocated by the Planning Practice Guidance, the Health Checks will consider the following criteria (where information is available), to provide an overview of how well they are performing:
- Diversity of uses
  - Proportion of vacant street level property
  - Commercial yields on non-domestic property
  - Customers' experience and behaviour
  - Retailer representation and intentions to change representation
  - Commercial rents
  - Pedestrian flows
  - Accessibility
  - Perception of safety and occurrence of crime
  - State of town centre environmental quality
  - Balance between independent and multiple stores
  - Extent to which there is evidence of barriers to new businesses opening and existing businesses expanding
  - Opening hours/availability/extent to which there is an evening and night time economy offer

# 5.0 THE SEQUENTIAL TEST

- 5.1 The retail assessment will include the consideration of the sequential test, to understand whether there are any more centrally located sites capable of accommodating the proposals. In doing so, it will have regard to the ability to accommodate the development as a whole, rather than the retail and community uses in isolation, either in whole or in a disaggregated format.
- 5.2 As part of this pre-application process, we would like to seek to identify and agree the sites to be considered as part of the Sequential Site Assessment. It is our intention that the sequential test will focus on the following Centres, and will include a consideration of vacant units, potential development sites, and sites that have been allocated by the Council:
- Gravesend Town Centre
  - Dartford Town Centre
- 5.3 We would welcome the Council's view on whether any other centres should be included as part of the sequential test.
- 5.4 Edge-of-centre sites are defined as accessible sites located within 300 metres of the Primary Shopping Areas (PSA) and Frontages. Anything beyond this, including sites which may be within 30 meters of the PSA but not easily accessible, will be considered to be out-of-centre.
- 5.5 The approach to the sequential test will follow the advice contained within the NPPF and the Planning Practice Guidance (PPG), along with the prevailing case law, as set out below.

## *Judgements*

- Dundee – Tesco Stores Limited v Dundee City Council (Scotland), 21 March 2012
- Scunthorpe – Zurich Assurance Limited v North Lincolnshire Council, 20 December 2012
- Mansfield – Aldergate Properties v Mansfield District Council, October 2015
- Leeds - Asda Stores Limited v Leeds City Council, January 2021

## *Secretary of State / Appeal Decisions*

- Rushden Lakes: Ref. APP/G2815/V/12/2190175
- Sheffield: Ref. APP/J4423/A/13/2189893
- Stoke-on-Trent: Ref. APP/M3455/A/13/2195541
- Scotch Corner: APP/V2723/V/15/3132873 and APP/V2723/V/16/3143678

# 6.0 CONCLUSIONS

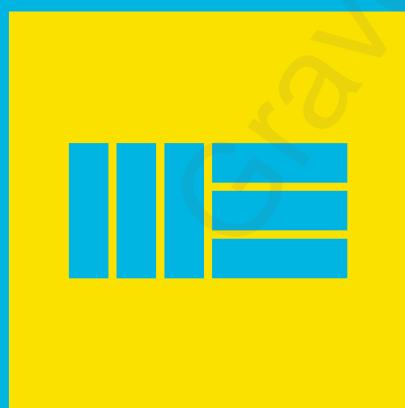
- 6.1 This Retail Scoping Report has been prepared ahead of an application for a mixed-use development in Northfleet, known as Northfleet Harbourside. The development proposes approximately 22,600 sq. m of 'high-street' retail associated with the wider leisure use, approximately 9,500 sq. m of associated food and beverage uses, and 9,000 sq. m of local amenity and community uses.
- 6.2 The purpose of this Retail Scoping Note is to agree the full scope of the Retail Assessment which will be submitted in support of this application. We welcome the Council's comments on all the information set out in this document, but in particular:
- The Scope of the Primary Area, including assumptions on inflow of expenditure;
  - The wording of the Household Survey questions;
  - Recent retail commitments – both food and non-food;
  - The baseline assumptions for the retail impact assessment; and
  - The scope of the sequential assessment

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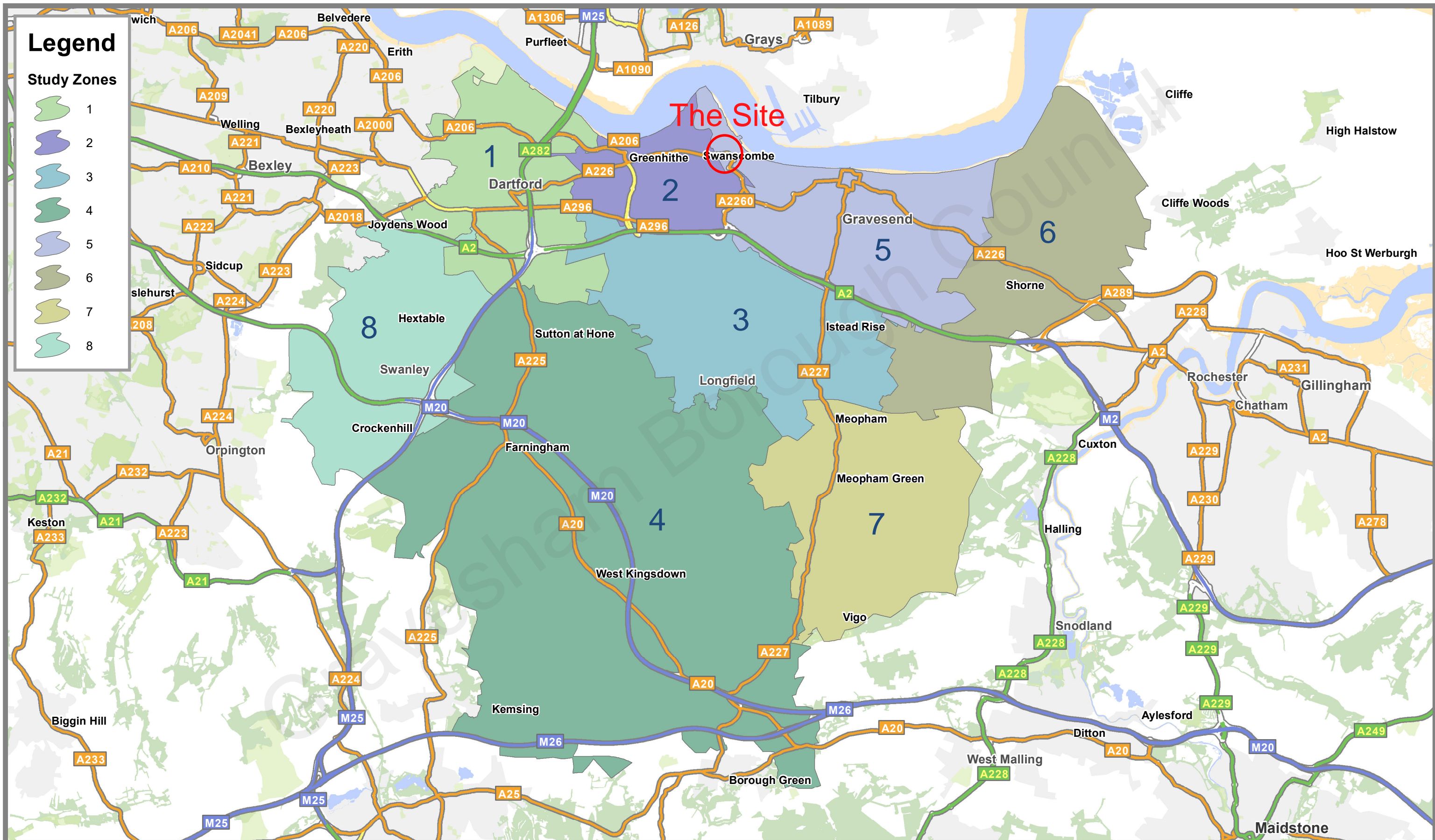
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# APPENDIX 2.0

# PRIMARY CATCHMENT AREA

Gravesham Borough Council



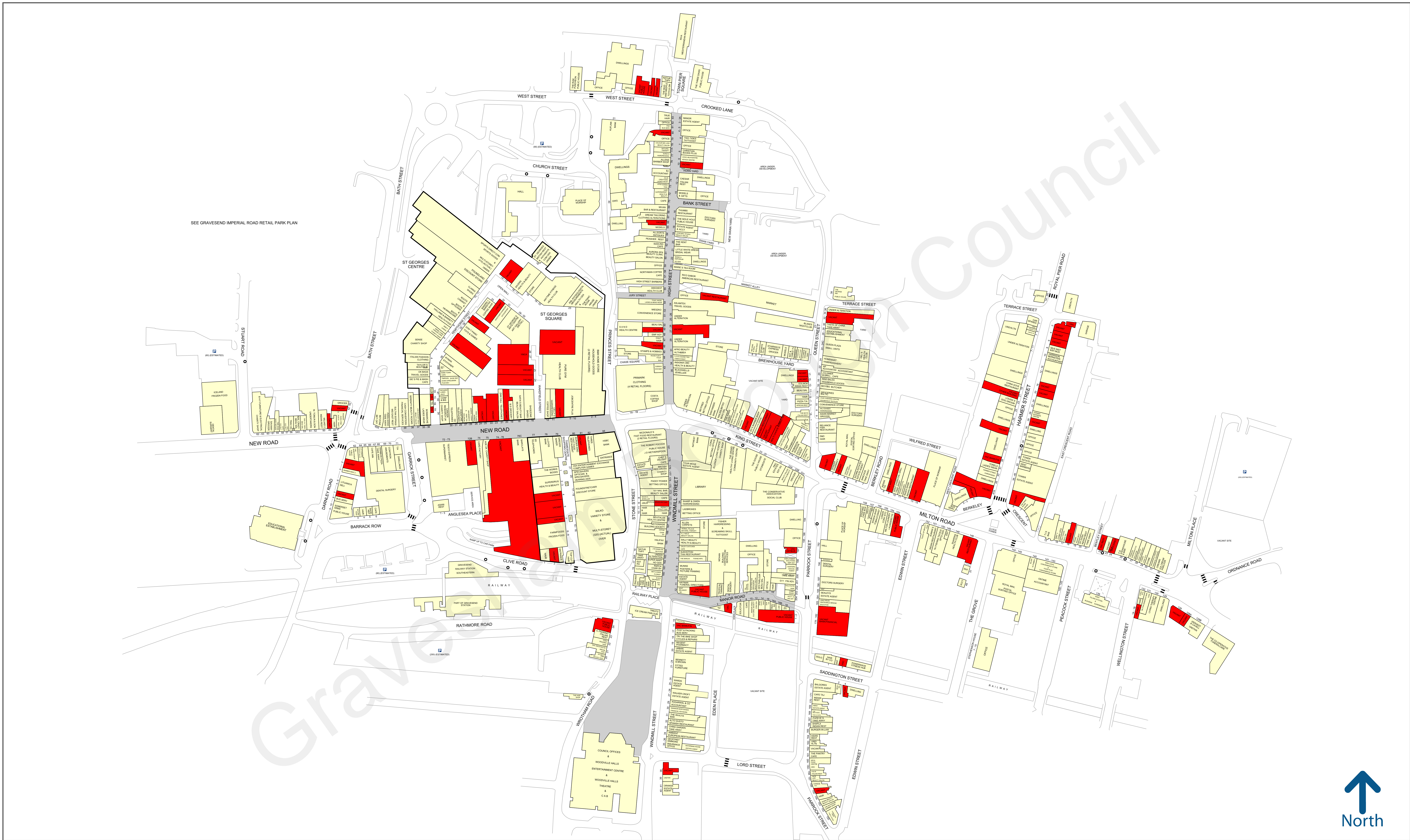
## Legend

### Study Zones

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

**APPENDIX 3.0**  
**GRAVESEND**  
**TOWN CENTRE**  
**– GOAD AND**  
**SCHEDULE OF**  
**VACANT UNITS**

Gravesend



50 metres

August 2022



Experian Goad Plan Created: 07/10/2022  
Created By: Montagu Evans



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# Gravesend Town Centre - Vacant Unit Schedule



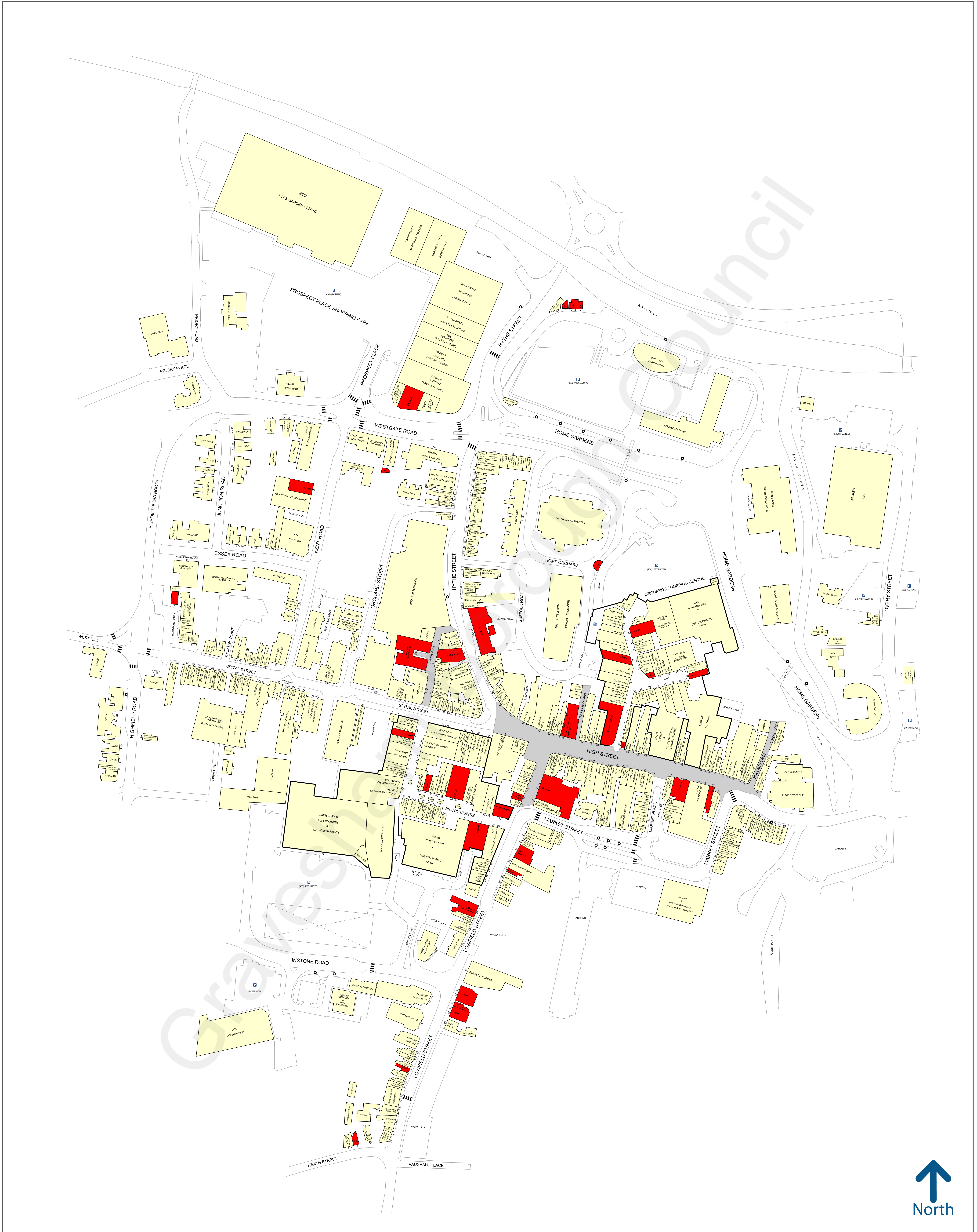
Category	Use Class	Street Number	Road Name	Goald Number	Postcode	Goald Area_m2
VACANT RETAIL/SERVICE	E/F.2	46	HIGH STREET	98143	DA11 0AY	90
VACANT RETAIL/SERVICE	E/F.2	20	HARMER STREET	98212	DA12 2AX	90
VACANT RETAIL/SERVICE	E/F.2	4	HARMER STREET	98132	DA12 2AX	90
VACANT RETAIL/SERVICE	E/F.2	28	HARMER STREET	98253	DA12 2AX	90
VACANT RETAIL/SERVICE	E	39	HARMER STREET	98283	DA12 2AP	90
VACANT RETAIL/SERVICE	E/F.2	2	HARMER STREET	98120	DA12 2AX	90
VACANT RETAIL/SERVICE	E/F.2	10	HIGH STREET	98050	DA11 0BQ	90
VACANT RETAIL/SERVICE	E/F.2	4	BERKLEY CRESCENT	98333	DA12 2AD	90
VACANT RETAIL/SERVICE	E/F.2	12	KING STREET	389689	DA12 2EB	80
VACANT RETAIL/SERVICE	E/F.2	38	WINDMILL STREET	547793	DA12 1BA	80
VACANT RETAIL/SERVICE	E/F.2	18	MILTON ROAD	98380	DA12 2RF	80
VACANT OTHER BUILDINGS	UC	18	HARMER STREET	547821	DA12 2AX	80
VACANT RETAIL/SERVICE	E/F.2	2	THAMESGATE SHOPPING CENTRE , CLIVE ROAD	98413	DA11 0AU	80
VACANT RETAIL/SERVICE	E/F.2	6	HARMER STREET	98139	DA12 2AX	80
RETAIL/SERVICE	E/F.2	24	MILTON ROAD	98402	DA12 2RF	70
VACANT RETAIL/SERVICE	E/F.2	49	HIGH STREET	98124	DA11 0AY	70
VACANT RETAIL/SERVICE	E	16	WINDMILL STREET	98514	DA12 1AS	70
VACANT RETAIL/SERVICE	E/F.2	80	HIGH STREET	98044	DA11 0BH	70
VACANT RETAIL/SERVICE	E/F.2	3	MILTON ROAD	98303	DA12 2RE	70
VACANT RETAIL/SERVICE	E/F.2		WEST STREET	508921	DA11 0BL	60
VACANT RETAIL/SERVICE	E/F.2	42	BATH STREET	98221	DA11 0DE	60
VACANT RETAIL/SERVICE	E	22	MILTON ROAD	98394	DA12 2RF	60
VACANT RETAIL/SERVICE	E/F.2		WEST STREET	508920	DA11 0BL	60
VACANT RETAIL/SERVICE	E/F.2	7	DARNLEY ROAD	98339	DA11 0RU	60
VACANT RETAIL/SERVICE	E/F.2	66	HIGH STREET	98068	DA11 0BB	60
VACANT RETAIL/SERVICE	E/F.2		ST GEORGES CENTRE , NEW ROAD	771386	DA11 0AA	580
VACANT RETAIL/SERVICE	E	178 - 182	PARROCK STREET	98476	DA12 1ES	540
VACANT OTHER BUILDINGS	E	197	PARROCK STREET	98410	DA12 1EW	50
VACANT RETAIL/SERVICE	E/F.2	155	PARROCK STREET	547811	DA12 1ER	50
VACANT RETAIL/SERVICE	E/F.2	128A	MILTON ROAD	378448	DA12 2PG	50
RETAIL/SERVICE	E/F.2	171	WINDMILL STREET	98354	DA12 1AH	50
RETAIL/SERVICE	E/F.2	26 - 27	ST GEORGES CENTRE, WAKEFIELD STREET	98147	DA11 0TD	420
VACANT RETAIL/SERVICE	E/F.2	4	SADDINGTON ROAD	508929	DA12 1ED	40
VACANT RETAIL/SERVICE	E/F.2	3	SADDINGTON STREET	2015779	DA12 1ED	40
VACANT RETAIL/SERVICE	E/F.2	49	NEW ROAD	98243	DA11 0AD	40
VACANT RETAIL/SERVICE	E/F.2	15	QUEEN STREET	372737	DA12 2EQ	40
VACANT RETAIL/SERVICE	E/F.2	1A - 1B	WELLINGTON STREET	508935	DA12 1JA	40
VACANT RETAIL/SERVICE	E/F.2	4	MANOR ROAD	98473	DA12 1AA	40
VACANT RETAIL/SERVICE	E/F.2	17	QUEEN STREET	98173	DA12 2EQ	40
VACANT RETAIL/SERVICE	E/F.2	37	ST GEORGES CENTRE, KEMPTHORNE STREET	98135	DA11 0TA	390
VACANT RETAIL/SERVICE	E/F.2	5	THAMESGATE SHOPPING CENTRE	98350	DA11 0AU	320
VACANT RETAIL/SERVICE	E/F.2		TERRACE STREET	98121	DA11 0TA	30
VACANT RETAIL/SERVICE	E/F.2	74 - 76	NEW ROAD	98276	DA11 0AF	2900
VACANT RETAIL/SERVICE	ESG	1 - 2	PARROCK STREET	98477	DA12 1EW	290
VACANT RETAIL/SERVICE	E/F.2	47A	HARMER STREET	98328	DA12 2AP	280
VACANT RETAIL/SERVICE	E/F.2	13 - 14	MILTON ROAD	98324	DA12 2RE	260
VACANT RETAIL/SERVICE	E/F.2	32 - 34	QUEEN STREET	98114	DA12 2EE	260
VACANT RETAIL/SERVICE	E	146	MILTON ROAD	98395	DA12 2RG	250
VACANT RETAIL/SERVICE	E/F.2	24	ST GEORGES CENTRE, WAKEFIELD STREET	98178	DA11 0TD	250
VACANT RETAIL/SERVICE	E/F.2	25	ST GEORGES CENTRE, WAKEFIELD STREET	98169	DA11 0TD	240
VACANT RETAIL/SERVICE	E/F.2	27 - 28	HIGH STREET	98127	DA11 0AZ	240
VACANT RETAIL/SERVICE	E/F.2	22 - 23	ST GEORGES CENTRE , NEW ROAD	98207	DA11 0AA	220
VACANT RETAIL/SERVICE	E/F.2	14 - 15	ST GEORGES CENTRE, ST GEORGES SQUARE	98080	DA11 0TB	190
VACANT RETAIL/SERVICE	E	16 - 17	KING STREET	98245	DA12 2EB	190
RETAIL/SERVICE	E/F.2	18	KING STREET	98246	DA12 2EB	180
VACANT OTHER BUILDINGS	UC	21	HARMER STREET	508937	DA12 2AX	180
VACANT RETAIL/SERVICE	E/F.2	24 - 25	ST GEORGES CENTRE , NEW ROAD	98213	DA11 0AA	160
VACANT RETAIL/SERVICE	E/F.2		ST GEORGES CENTRE , NEW ROAD	2015782	DA11 0AA	160
VACANT RETAIL/SERVICE	E/F.2	72B	NEW ROAD	486865	DA11 0AF	160
VACANT RETAIL/SERVICE	E/F.2	6	BERKLEY CRESCENT	98338	DA12 2AH	160
VACANT RETAIL/SERVICE	E/F.2	31	HARMER STREET	98248	DA12 2AP	150
VACANT RETAIL/SERVICE	E/F.2	2	DARNLEY ROAD	98307	DA11 0RU	150
VACANT RETAIL/SERVICE	ESG	24	STONE STREET	98478	DA11 0NP	150
VACANT RETAIL/SERVICE	E/F.2	4	THAMESGATE SHOPPING CENTRE	98340	DA11 0AU	150
VACANT RETAIL/SERVICE	ESG		WEST STREET	524278	DA11 0BL	140
VACANT RETAIL/SERVICE	ESG	1	MANOR ROAD	98457	DA12 1AA	130
VACANT RETAIL/SERVICE	ESG	153	MILTON ROAD	98370	DA12 2RG	130
VACANT RETAIL/SERVICE	E		HIGH STREET	627472	DA11 0AZ	120
VACANT RETAIL/SERVICE	E/F.2	9	MILTON ROAD	389690	DA12 2RE	120
VACANT RETAIL/SERVICE	E/F.2	32	ST GEORGES CENTRE , ST GEORGES SQUARE	98101	DA11 0TB	120
VACANT RETAIL/SERVICE	E/F.2	20	ST GEORGES CENTRE, NEW ROAD	98199	DA11 0AA	120
VACANT RETAIL/SERVICE	E/F.2	1	MILTON ROAD	98299	DA12 2RE	120



VACANT RETAIL/SERVICE	E/F.2	7	THAMESGATE SHOPPING CENTRE	98373	DA11 0AU	110
VACANT RETAIL/SERVICE	E/F.2	34	ST GEORGES CENTRE, KEMPTHORNE STREET	98113	DA11 0TA	110
VACANT RETAIL/SERVICE	E/F.2	128	MILTON ROAD	378449	DA12 2PG	110
JEWELLERY, WATCHES & SILVER	E/F.2	81	THAMESGATE SHOPPING CENTRE , NEW ROAD	98268	DA11 0AF	100
VACANT RETAIL/SERVICE	E	15	KING STREET	98239	DA12 2EB	100
VACANT RETAIL/SERVICE	E/F.2	1A	ST GEORGES CENTRE, KEMPTHORNE STREET	486868	DA11 0TA	10
VACANT RETAIL/SERVICE	ESG	1C	ST GEORGES CENTRE , KEMPTHORNE STREET	486870	DA11 0TA	10

Gravesham Borough Council

**APPENDIX 4.0**  
**DARTFORD**  
**TOWN CENTRE**  
**– GOAD AND**  
**SCHEDULE OF**  
**VACANT UNITS**



50 metres

August 2022

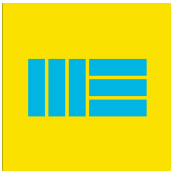
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# Dartford Town Centre - Vacant Unit Schedule



Category	Use Class	Street Number	Road Name	Postcode	Goald Area_m2	Goald Number
GROCERS & DELICATESSENS	E/F.2	51	HIGH STREET	DA1 1DS	90	96714
VACANT RETAIL/SERVICE	E/F.2	24	ORCHARDS SHOPPING CENTRE	DA1 1DN	80	404374
VACANT RETAIL/SERVICE	E/F.2	4 - 10	LOWFIELD STREET	DA1 1HA	710	96705
VACANT RETAIL/SERVICE	E/F.2	44	PRIORY CENTRE	DA1 2HR	70	96704
RETAIL/SERVICE	E/F.2	20	HIGH STREET	DA1 1BY	70	96647
VACANT RETAIL/SERVICE	ESG	7	WESTGATE HOUSE, SPITAL STREET	DA1 2EH	60	96512
VACANT RETAIL/SERVICE	E	3A	COPPERFIELDS	DA1 2DE	570	318004
VACANT RETAIL/SERVICE	E/F.2	11 - 27	HYTHE STREET	DA1 1BE	540	340825
VACANT OTHER BUILDINGS	E	12	LOWFIELD STREET	DA1 1HA	50	96717
VACANT RETAIL/SERVICE	E/F.2	2 - 3	STATION APPROACH	DA1 1BP	50	648766
RETAIL/SERVICE	E/F.2	1	ORCHARDS SHOPPING CENTRE	DA1 1DN	450	461734
VACANT RETAIL/SERVICE	E	28	LOWFIELD STREET	DA1 1HD	40	96777
VACANT RETAIL/SERVICE	E	73	LOWFIELD STREET	DA1 1HP	40	96821
VACANT RETAIL/SERVICE	E/F.2		HOME ORCHARD	DA1 1EG	40	353862
VACANT RETAIL/SERVICE	ESG	1	HEATH STREET	DA1 2LD	40	96848
VACANT RETAIL/SERVICE	ESG	52	LOWFIELD STREET	DA1 1HJ	40	96808
VACANT RETAIL/SERVICE	E/F.2	38 - 40	PRIORY CENTRE	DA1 2HR	390	96690
VACANT RETAIL/SERVICE	E/F.2	19 - 21	PRIORY CENTRE	DA1 2HR	380	411311
VACANT RETAIL/SERVICE	E/F.2	18	ORCHARDS SHOPPING CENTRE	DA1 1DN	30	96586
VACANT RETAIL/SERVICE	E/F.2		PROSPECT PLACE SHOPPING PARK, PROSPECT PLACE	DA1 1DY	290	639421
RETAIL/SERVICE	E/F.2	22	HIGH STREET	DA1 1BY	240	96635
VACANT RETAIL/SERVICE	E	14	HYTHE STREET	DA1 1BD	230	96561
VACANT RETAIL/SERVICE	ESG	33	LOWFIELD STREET	DA1 1EW	220	96784
VACANT RETAIL/SERVICE	E/F.2	45	HIGH STREET	DA1 1DJ	220	96709
VACANT RETAIL/SERVICE	E/F.2	48 - 50	LOWFIELD STREET	DA1 1HJ	200	96806
VACANT RETAIL/SERVICE	E/F.2	15	ORCHARDS SHOPPING CENTRE	DA1 1DN	200	96534
VACANT RETAIL/SERVICE	E/F.2	35A	ORCHARDS SHOPPING CENTRE	DA1 1DN	20	96670
VACANT RETAIL/SERVICE	E/F.2		WESTGATE ROAD	DA1 2AR	20	96855
VACANT RETAIL/SERVICE	E/F.2	1	STATION APPROACH	DA1 1BP	20	610680
VACANT RETAIL/SERVICE	E	4	STATION APPROACH	DA1 1BP	20	96439
VACANT RETAIL/SERVICE	E/F.2	25	KENT ROAD	DA1 2AA	190	648765
VACANT RETAIL/SERVICE	E	24	LOWFIELD STREET	DA1 1HD	170	96765
RETAIL/SERVICE	E/F.2	6	ORCHARDS SHOPPING CENTRE	DA1 1DN	170	96562
RETAIL/SERVICE	E/F.2	32	PRIORY CENTRE	DA1 2HR	160	96731
VACANT RETAIL/SERVICE	E/F.2	56 - 58	LOWFIELD STREET	DA1 1HJ	140	96809
VACANT RETAIL/SERVICE	E/F.2	4	PRIORY CENTRE	DA1 2HR	100	96655

Gravesham Borough Council

# APPENDIX 5.0

# RETAIL IMPACT

# TABLES

Gravesham Borough Council

Northfleet Harbourside  
Retail Impact Assessment

**Table 1 - Population**

Zone	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Total
2022	48,291	22,249	17,007	34,431	91,330	10,045	22,959	9,742	256,055
2027	50,816	23,422	17,761	35,822	94,748	9,669	23,897	10,108	266,243
2032	53,641	24,730	18,613	37,374	98,663	10,477	24,988	10,536	279,022

**Notes**

1. Population base taken from Table 1 'Survey Population Forecasts' of the North Kent SHENA Retail & Commercial Leisure Assessment (Nov 2016)
2. Population grown in line with the medium growth scenario from Table 1 'Survey Population Forecasts' of the North Kent SHENA Retail & Commercial Leisure Assessment (Nov 2016)

**Northfleet Harbourside  
Retail Impact Assessment**

**Table 2 - Per Capita Expenditure - Comparison Goods**

<b>Zone</b>	<b>Zone 1</b>	<b>Zone 2</b>	<b>Zone 3</b>	<b>Zone 4</b>	<b>Zone 5</b>	<b>Zone 6</b>	<b>Zone 7</b>	<b>Zone 8</b>
2022	£3,816	£4,041	£5,057	£4,898	£3,659	£4,952	£4,894	£4,158
2027	£4,381	£4,639	£5,806	£5,623	£4,201	£5,685	£5,737	£4,874
2032	£5,050	£5,346	£6,692	£6,481	£4,842	£6,552	£6,612	£5,617

**Notes**

1. 2020 figure provided by Experian
2. Price base adjusted to from 2020 to 2018 using Appendix 4B of Experian Retail Planner Briefing Note 19 (January 20202)
3. Grown in accordance with Figures 1a and 1b of Experian Retail Planner Briefing Note 19 (January 20202)
4. Does not exclude SFT

2018 Prices

Gravesham Borough Council

**Northfleet Harbourside  
Retail Impact Assessment**

**Table 3 - Total Available Expenditure - Comparison Goods (£m)**

Zone	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Total	Total minus SFT	Growth
2022	£184.29	£89.90	£86.01	£168.64	£334.18	£49.74	£112.37	£40.51	£1,065.63	£810.95	
2027	£222.64	£108.65	£103.12	£201.43	£398.01	£54.97	£137.10	£49.26	£1,275.18	£934.71	15.26%
2032	£270.86	£132.22	£124.55	£242.22	£477.68	£68.65	£165.22	£59.18	£1,540.58	£1,095.35	17.19%

**Notes**

1. Table 1 x Table 2
2. SFT deducted in accordance with Figure 5, Appendix 3 of Retail Planner Briefing Note 19 (January 2022)

2018 Prices

Gravesham Borough Council

**Northfleet Harbourside  
Retail Impact Assessment**

**Table 4 - Turnover of Proposed Development**

	Gross External Area	Gross Internal Area	Net Retail Sales Floorspace	Net Comparison Floorspace	Sales Density	Turnover (£m)
	(sq. m)	(sq. m)	(sq. m)	(sq. m)	(£/sq. m)	
Retail	22,500	21,375	17,100	16,245	6,500	£106.86
Other Local / Community Uses	1,100	1,045	836	418	4,000	£1.69

**Notes**

1. Net Retail Floorspace assumed to be 80% of GEA
2. Sales density as stated on Retail Scoping Note
3. 50% Local Community Use floorspace assumed to be for retail sales
4. GIA assumed to be 95% of GEA

Northfleet Harbourside  
Retail Impact Assessment

Table 5 - Pre-Development Turnover 2022 - Comparison Goods

Store / Centre	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Total
Gravesend Town Centre	£2.16	£2.57	£5.39	£0.53	£79.49	£2.69	£5.25	£0.00	£98.08
Gravesend Edge / Out-of-Centre	£1.08	£4.84	£9.39	£3.65	£48.42	£9.20	£8.73	£0.01	£85.32
Dartford Town Centre	£44.87	£7.79	£3.76	£8.43	£16.60	£0.75	£0.79	£2.97	£85.96
Dartford Edge / Out of Centre	£2.66	£0.05	£0.67	£0.57	£2.48	£0.15	£0.88	£0.55	£8.02
Bluewater Shopping Centre	£51.15	£31.86	£34.93	£37.29	£70.53	£13.12	£28.07	£9.16	£276.11
<b>Other Centres in Catchment Area</b>									
Longfield Villiage Centre	£0.09	£0.00	£1.98	£3.38	£0.00	£0.07	£0.04	£0.00	£5.56
Other Centres in Catchment Area	£2.09	£2.27	£0.96	£4.49	£3.07	£1.17	£4.99	£2.10	£21.15
<b>Other Centres in Catchment Area Total</b>	<b>£2.19</b>	<b>£2.27</b>	<b>£2.94</b>	<b>£7.87</b>	<b>£3.07</b>	<b>£1.24</b>	<b>£5.03</b>	<b>£2.10</b>	<b>£26.71</b>
<b>Other stores in Catchment Area</b>									
Other stores in Catchment Area	£0.00	£0.00	£0.07	£0.00	£0.00	£0.00	£0.00	£0.54	£0.61
<b>Other stores in Catchment Area Total</b>	<b>£3.31</b>	<b>£9.59</b>	<b>£0.25</b>	<b>£4.89</b>	<b>£3.25</b>	<b>£0.00</b>	<b>£0.25</b>	<b>£4.04</b>	<b>£25.57</b>
<b>Catchment Area Total</b>	<b>£107.42</b>	<b>£58.97</b>	<b>£57.32</b>	<b>£63.25</b>	<b>£223.84</b>	<b>£27.15</b>	<b>£48.99</b>	<b>£18.83</b>	<b>£605.77</b>
<b>Other Centres Outside Catchment Area</b>									
Sevenoaks Town Centre	£0.00	£0.00	£0.15	£12.97	£0.34	£0.00	£1.53	£0.70	£15.70
Orpington Town Centre	£0.57	£0.00	£1.28	£3.39	£0.43	£0.00	£0.11	£0.81	£6.60
Crayford Town Centre	£3.11	£0.84	£0.18	£0.00	£0.00	£0.00	£0.00	£0.70	£4.83
Royal Tunbridge Wells Town Centre	£0.00	£0.00	£0.00	£5.12	£0.00	£0.00	£0.31	£0.00	£5.43
Central London / West End	£0.09	£0.20	£0.18	£0.79	£6.14	£1.10	£0.77	£0.26	£9.52
Other Centres Outside Catchment Area	£2.19	£0.39	£0.76	£5.99	£4.27	£2.97	£1.22	£1.46	£19.23
<b>Other Centres Outside Catchment Area Total</b>	<b>£5.96</b>	<b>£1.43</b>	<b>£2.54</b>	<b>£28.25</b>	<b>£11.19</b>	<b>£4.07</b>	<b>£3.94</b>	<b>£3.92</b>	<b>£61.31</b>
<b>Other Stores Outside Catchment Area</b>									
Lakeside / Wrest Thurrock	£4.08	£1.92	£2.31	£3.42	£6.46	£0.49	£2.36	£0.31	£21.37
Nugent Shopping Park, Orpington	£0.00	£0.00	£0.00	£2.73	£0.00	£0.00	£0.00	£2.31	£5.04
Tower Retail Park, Crayford	£20.42	£5.47	£1.68	£2.48	£5.09	£0.00	£0.89	£0.78	£36.81
Springvale Retail Park, Orpington	£0.13	£0.00	£0.09	£6.12	£0.28	£0.50	£0.14	£2.56	£9.82
South Aylesford Retail Park, Aylesford	£0.00	£0.00	£0.00	£2.66	£0.00	£0.00	£2.94	£0.00	£5.60
Other Stores Outside Catchment Area	£2.23	£0.52	£0.91	£18.74	£7.45	£5.64	£3.03	£2.09	£40.61
<b>Other Stores Outside Catchment Area Total</b>	<b>£26.86</b>	<b>£7.91</b>	<b>£5.00</b>	<b>£36.14</b>	<b>£19.28</b>	<b>£6.63</b>	<b>£9.37</b>	<b>£8.06</b>	<b>£119.25</b>
<b>TOTAL</b>	<b>£140.24</b>	<b>£68.31</b>	<b>£64.86</b>	<b>£127.64</b>	<b>£254.31</b>	<b>£37.85</b>	<b>£62.30</b>	<b>£30.81</b>	<b>£786.33</b>

Notes

1. Based on results of household survey

**Northfleet Harbourside  
Retail Impact Assessment**

**Table 6 - Commitments**

Commitment	Comparison Net Sales Area	Estimated Survey Derived Comparison Turnover	Convenience Net Sales Area	Estimated Survey Derived Convenience Turnover
	sq. m	£m	sq. m	£m
Ebbsfleet Central	9,675	£40.60	4,031	£28.20
Eastern Quarry	1,932	£9.30	2,292	£18.30
<b>Total</b>	<b>11,607</b>	<b>£49.90</b>	<b>6,323</b>	<b>£46.50</b>

Notes

1. Details of Comparison Turnover taken from Tables 7 and 10 of Retail Impact Assessment for Planning App Ref.EDC/22/0168
2. Details of Convenience Turnover taken from Tables 7 and 10 of Retail Impact Assessment for Planning App Ref.EDC/22/0168

Gravesham Borough Council

Northfleet Harbourside  
Retail Impact Assessment

Table 7 - Comparison Trade Diversion - 2027 & 2032

Centre	Pre-Development Turnover £m			Total Diversion to Ebbsfleet Central and Eastern Quarry	Diversion to Proposal (£m)	Survey Derived Post Development Turnover £m		Direct Impact		Cumulative Comparison Impact		Change in Turnover	
	2022	2027	2032			2027	2032	2027	2032	2027	2032	2022 - 2027	2022 - 2032
Gravesend Town Centre	£98.08	£108.00	£121.11	3.62	£3.76	£100.62	£113.73	3.48%	3.10%	6.83%	6.09%	£2.54	£15.65
Gravesend Edge / Out-of-Centre	£85.32	£93.94	£105.35	1.40	£1.21	£91.33	£102.73	1.29%	1.15%	2.78%	2.48%	£6.01	£17.42
Dartford Town Centre	£85.96	£94.65	£106.14	4.09	£2.43	£88.14	£99.63	2.56%	2.29%	6.88%	6.13%	£2.18	£13.67
Dartford Edge / Out of Centre	£8.02	£8.83	£9.90	0.59	£0.00	£8.24	£9.31	0.00%	0.00%	6.70%	5.98%	£0.22	£1.29
Bluewater	£1,162.55	£1,280.08	£1,435.48	29.94	£60.72	£1,189.42	£1,344.82	4.74%	4.23%	7.08%	6.32%	£26.86	£182.26
Other Stores / Centres in Catchment Area	£52.28	£57.56	£63.38	0.56	£2.20	£54.80	£60.62	3.82%	3.47%	4.79%	4.35%	£2.53	£8.34
Other Stores / Centres Outside Catchment Area	£180.56	£198.81	£218.91	9.70	£9.78	£179.33	£199.43	-	-	-	-	-	-

Notes

- 1 Trade Draw patterns based on Montagu Evans Assumptions
- 2 Direct Impact on Turnover from PCA only (apart from Bluewater, see note (3) below)
- 3 Expenditure from PCA assumed to be 25% of Bluewater's turnover from its own PCA (95% of its total turnover). An allowance for a further 5% inflow has been included in line with Retail Assessment for Dartford Application Ref. 16/01207/OUT(Table A4, Appendix 7)
- 4 Diversion to Ebbsfleet Central based on Table 13 of Appendix 4 of Retail Impact Assessment for Planning App Ref.EDC/22/0168
- 5 Diversion to Eastern Quarry based on Table 8 of Appendix 4 of Retail Impact Assessment for Planning App Ref.EDC/22/0168 and ME assumptions

Gravesham Borough

Northfleet Harbourside  
Retail Impact Assessment

Table 8- Total Impact

Centre	Total Pre-Developmnet Turnover			Diversion to Proposal and Commitments		Total Post-Developmnet and Commitments Turnover		Total Impct of Proposal and Commitments		Change in Turnover	
	2022	2027	2032	2027	2032	2027	2032	2027	2032	2022 - 2027	2022 - 2032
Gravesend Town Centre	£120.42	£131.08	£145.30	£4.50	£4.50	£126.58	£140.79	3.44%	3.10%	£6.16	£20.38
Dartford Town Centre	£126.91	£136.98	£150.49	£4.50	£4.50	£132.48	£145.99	3.28%	2.99%	£5.57	£19.08
Bluewater	£1,240.45	£1,360.60	£1,519.84	£64.52	£64.52	£1,296.07	£1,455.32	4.74%	4.25%	£55.62	£214.87

Notes

1 Includes convenience impact of commitments based on Tables 4, 8, and 14 of Appendix 5 of Retail Impact Assesmet for Planning App Ref.EDC/22/0168 and ME assumptions

2. Convenience imapcts assume some trade diversion from Easten Quarry to Ebbsfleet Central, in line with Table 14 of Appendix 5 of Retail Impact Assesmet for Planning App Ref.EDC/22/0168 and ME assumptions

Gravesham Borough

# APPENDIX 6.0

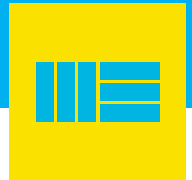
# GRAVESEND

# TOWN CENTRE

# HEALTH

# CHECK



Gravesham Borough Council



<b>CENTRE:</b>	Gravesend Town Centre
<b>LOCAL AUTHORITY:</b>	Gravesham Council
<b>DATE UNDERTAKEN:</b>	Wednesday 10 August 2022

1.	<p><b><u>Diversity Of Uses</u></b></p> <p>Gravesend Town Centre provides a range of retail, services, leisure, cultural and civic uses. The primary function of the town centre appears to be focused towards the lower to mid-tier retail and services.</p> <p>The main retail and leisure offer within the Town Centre is focussed on the pedestrianised High Street as well as the two main shopping centres. These are:</p> <ol style="list-style-type: none"><li>1. <b>St George Shopping Centre</b> comprises 13,320 sqm of retail floorspace across 43 units and served by a 370 space multi store car park. The shopping centre is anchored by Boots, WH Smith, Sports Direct and Anytime Fitness</li><li>2. <b>Thames Gateway Shopping Centre</b> comprises 9290 sqm of retail floorspace across 18 units and is anchored by Wilko.</li></ol> <p>Gravesend also features its own indoor 'Borough Market', open everyday except on Sundays. The market features a range of local traders occupying stalls on a fixed and temporary basis offering a variety of food and non-food goods including fruit and vegetables, fresh meat, fish, clothing, footwear, jewellery and hardware items.</p> <p>The Town Centre does also comprise a mix of commercial leisure uses which also support the retail offer. These include a range of cafes, restaurants, bars and pubs, as well as a multi-use theatre / cinema / exhibition space contained within Woodville Hall.</p>
2.	<p><b><u>Proportion Of Vacant Street Level Property</u></b></p> <p>At the time of the site visit, the centre had a vacancy rate of 14.4%, a decrease since the date of the 2016 Retail and Commercial Leisure Assessment when the vacancy rate was 16.67%. This demonstrates an improvement in the centre over this period, despite the effects of Covid and the closure of national retailers including Debenhams which had previously comprised an anchor tenant within in the Town Centre.</p> <p>It is recognised that some level of vacancy within centres is beneficial, as it allows for 'churn' as the market changes and evolves.</p>

3	<p><b><u>Customers' Experience and Behaviour</u></b></p> <p>The most recent Retail Study (2016) did not assess the customer experienter/ behaviour in detail, and a survey to understand this has not been undertaken in support of this application.</p>
4	<p><b><u>Retailer Representation and Intentions to Change Representation</u></b></p> <p>The retailer representation highlighted a relatively wide variety of both national retailers and independent stores independent stores.</p> <p>In regard to comparison goods, the main national multiple retailers include B&amp;M, Wilko, Poundstretcher, Cardfactory, Primark, Poundland, Clarks, Sports Direct and Holland &amp; Barrett. The St George's Centre and the Thamesgate accommodates many these major national multiple retailers.</p> <p>Given the size of Gravesend Town Centre, a greater national retailer representation could be expected within the Town Centre, and the centre has seen the loss of a number of higher-end retailers in recent years, such as Marks and Spencer and Debenhams. However, the centre does accommodate a wide variety of independent comparison goods retailers, most commonly found on the secondary frontages.</p> <p>In terms of food and convenience representation, Tesco Express comprises the main foodstore anchor with the Town Centre itself, although the Asda store on Thames Way is a short walk from the Town Centre, accessed by an escalator from Overcliffe, which was busy with shoppers linking trips between the store and the Town Centre at the time of the site visit. The remaining convenience representation is characterised by small scale independent stores located throughout the Town Centre.</p> <p>It is clear that Gravesend has undergone recent changes in its representation with the closure of departments stores such as M&amp;S and Debenhams. These uses have been replaced by more value-driven retailers such as B&amp;M.</p>
5	<p><b><u>Commercial Rents</u></b></p> <p>According to the latest PMA PROMIS Report from 30 September 2022, the estimated Prime Zone A retail rent for Dartford Town Centre stood at £25 per sq. ft. This represents no change on the end of 2021 level of prime rents in the town. This is lower than both Dartford and Gravesend.</p>
6	<p><b><u>Pedestrian Flows</u></b></p> <p>The retail core of the Town Centre is focused on New Road and King Street which benefits from the strongest levels of footfall. From the site visit, it was evident that a significant proportion of the footfall within the Town Centre was drive by the national retailers located in along New Road as well as the St Georges and Thamesgate Shopping Centres.</p> <p>Pedestrian traffic is also highest in this area of the centre given its close- proximity to Gravesend Train Station – a key point of access into the town centre from neighbouring areas.</p> <p>While neighbouring sections of the town centre were able to draw form this footfall, as expected, areas further out of the town centre were observed to have far lower rates of pedestrian flow.</p>

7	<p><b><u>Accessibility – This Includes Transport Accessibility And Accessibility For People With Different Impairments Or Health Conditions, As Well As Older People With Mobility Requirements.</u></b></p> <p>Gravesend Town Centre is widely accessible by a variety of modes of transport. The centre is well served by public transport with a high number of bus stops served by a range of services.</p> <p>Gravesend train station is located to the south west of the centre immediately west of Gravesend Community Square, providing a high-speed connection to Central London, as well as services north of London to St Albans and Luton, and Kent-bound to Rochester, Margate and Ramsgate.</p> <p>For those wishing to access the centre via private vehicle, Gravesend also features a good level of parking provision, namely the Parrock Street car park and further parking provision located on Rathmore Road.</p> <p>Large parts of the Town Centre, particularly the retail core, are pedestrianised which maximises permeability. These areas are also highly accessible for those with limited mobility.</p>
8	<p><b><u>Perception Of Safety and Occurrence of Crime</u></b></p> <p>The general perception of safety within the Town Centre was high while the occurrence of crime appeared to be low. Vandalism and other indication of anti-social behaviour was generally absent from the Town Centre at the time of the visit, during the day.</p> <p>According to <a href="http://www.police.uk">www.police.uk</a>, the 187 crimes were recorded within the Pelham Area, which covers much of the Town Centre, in August 2022, including 63 for violence and sexual offences, 26 for shoplifting, 25 for anti-social behaviour and 17 for criminal damage and arson.</p>
9	<p><b><u>State Of Town Centre Environmental Quality</u></b></p> <p>Gravesend Town Centres environmental quality was perceived to be good, with the provision of street furniture / seating, in addition to planting and landscaping. The centre does offer large pedestrianised and public spaces where the environmental quality was observed to be relatively high, encouraging positive social interactions between users. There are also a number of historic buildings within the Town Centre which add to its environmental quality. However, the quality of the Town Centre does reduce beyond the main pedestrianised retail core.</p> <div style="display: flex; justify-content: space-around;">   </div>

10	<p><b><u>Balance Between Independent and Multiple Stores</u></b></p> <p>While there is a relative strong representation of national multiple retailers in Gravesend, diversity within occupying units, generally towards the low-mid retail market. The national retailers were generally occupied larger format stores, located principally in more central part of the Town Centre. In these locations smaller independent shops were less common. A higher proportion of independent occupiers, particularly cafes and restaurants are located in the secondary parts of centre, in areas characterised by smaller units.</p>
11	<p><b><u>Extent To Which There Is Evidence of Barriers to New Businesses Opening And Existing Businesses Expanding</u></b></p> <p>At the time of the site visit there were a number of vacant units which could accommodate new businesses. However, the majority of these are small scale, being below 100 sq. m in size. The largest unit, the former Debenhams, would be too large for many businesses to take on, and would therefore need to be subject to a comprehensive re-modelling, which presents a barrier.</p> <p>There are a number of mid-size units, between 300-500 sq. m in size, which could accommodate new/expanded businesses, but there are no vacant large footprint units, apart from the Debenhams, which presents a barrier to those looking for larger floorplate units.</p> <p>Notwithstanding this, there is evidence of some new businesses locating within the Town Centre, since the time of the time of the previous GOAD plan update.</p>
12	<p><b><u>Opening Hours/Availability/Extent to Which There Is an Evening And Night Time Economy Offer</u></b></p> <p>The majority of main town centre services are limited to daytime / early evening hours and activities focused on the daytime activities, such as shopping and a supporting F&amp;B offer.</p> <p>The Town Centre does have a number of pubs and independent restaurants that are open into the evening, as well as the Woodville Halls theatre and late-night bars and clubs. However, although there are a number of national pub chains, there are no main national restaurant operators in the centre open into the evening, which limits the overall offer.</p> <p>Although there is a theatre, there are no other evening leisure uses in the Town Centre, such as a cinema or bowling alley.</p>

# APPENDIX 7.0

# DARTFORD

# TOWN CENTRE

# HEALTH

# CHECK

Gravesend Borough Council



<b>CENTRE:</b>	Dartford
<b>LOCAL AUTHORITY:</b>	Dartford Borough Council
<b>DATE UNDERTAKEN:</b>	Wednesday 10 August 2022

1.	<p><b><u>Diversity Of Uses</u></b></p> <p>Dartford Town Centre provides a range of retail, services, leisure, cultural and civic facilities. It is considered that the primary function is as a lower to mid-tier retail and service destination for local residents.</p> <p>According to the latest Experian Goad data, there are 354 retail and service outlets in the Town Centre, trading from a total floorspace of 85,779 sq. m. The Town Centres main retail and leisure offer is focusses on the pedestrianised High Street and in the three main shopping centres. These are:</p> <ol style="list-style-type: none"><li>1. <b>Priory Shopping Centre:</b> comprises of 13,470 sq. m of retail floorspace and is anchored by Sainsburys;</li><li>2. <b>Orchards Shopping Centre:</b> comprises of 10,035 sq. m of retail floorspace and includes an Aldi supermarket; and</li><li>3. <b>Prospect Place:</b> comprises of 14 units with a total floorspace of 17,837 sq. m. Offer is characterised by large format multiple retailers and leisure operators including TK Maxx, M&amp;S, Matalan and Pizza Hut.</li></ol> <p>Dartford Town Centre also has a market character which has a positive impact on its attraction, vitality and viability. There are two market days, Thursday and Saturday, which both take place on the High Street. Stalls sell a wide range of food and non-food goods including fruit and vegetables, fresh meat, fish, clothing, footwear, jewellery and hardware items.</p> <p>The Town Centre also has a number of leisure facilities that together make a significant contribution to the diversity of the traditional retail, commercial and service offer. The main attractions include:</p> <ol style="list-style-type: none"><li>1. <b>The Orchard Theatre</b></li><li>2. <b>Central Park:</b> A 19ha park, which accommodates a café, children's playground, skate park and a basketball court.</li></ol>
2	<p><b><u>Proportion Of Vacant Street Level Property</u></b></p> <p>On the day of the site visit the town centre had a total of 36 vacant units out of 392, representing an 9% vacancy rate. This shows the continued decrease in the vacancy rate over time as set out in the 2021 Dartford and Ebbsfleet Retail Study which noted there was a vacancy rate of 18.6% in 2019, 18.9% in 2015</p>

	<p>and 21.9% in 2009. This demonstrates an improvement in the centre over this period, demonstrating investor confidence in the town.</p>
3	<p><b><u>Customers' Experience and Behaviour</u></b></p> <p>The 2021 Retail Study did not contain any data on customer's views and behaviour, in terms of how Dartford Town Centre is viewed by local residents, and a survey to understand this has not been undertaken in support of this application.</p>
4	<p><b><u>Retailer Representation and Intentions to Change Representation</u></b></p> <p>Dartford Town Centre has a good mix of national multiples and independent businesses.</p> <p>In regard to comparison goods, the main retailers include Poundland, Boots, Primary, WH Smith and New Look. Prospect Place accommodates a number of the major national multiples in larger format retail uses, including Asda Living, B&amp;Q and Matalan. However, Dartford no longer has a major department store or variety store following the closure of Co-Op in February 2007.</p> <p>In terms of food and convenience representation, Sainsbury's in the Priory Centre is considered the main foodstore anchor. The former Waitrose in the Orchards Centre was identified in the 2010 Retail Study as underperforming and has subsequently been replaced by Aldi. The other food stores comprise Marks &amp; Spencer Simply Food at Prospect Place and Iceland.</p> <p>In terms of cafes, restaurants and pubs, there are limited national franchises in the Town Centre. The main brands comprise McDonalds, Wimpy, Pizza Hut, Costa Coffee, Subway. There are also few branded pubs, although the centre does have pubs operated by Weatherspoon's and Shepherd Neame. There therefore remains a clear gap in Dartford's market for food and beverage offer.</p> <p>The centre doe accommodates a number of independent retailers, although these are mainly located within the more secondary areas.</p>
5	<p><b><u>Commercial Rents</u></b></p> <p>According to the latest PMA PROMIS Report from 30 September 2022, the estimated Prime Zone A retail rent for Dartford Town Centre stood at £30 per sq. ft. This represents no change on the end of 2021 level of prime rents in the town. This higher than Gravesend, but lower than Bluewater.</p>
6	<p><b><u>Pedestrian Flows</u></b></p> <p>Pedestrian flows experienced during the site visit were considered to be relatively heavy throughout town, although the highest level of footfall was experienced along High Street (West) as well as within the Orchards Shopping Centre.</p>

7 **Accessibility – This Includes Transport Accessibility and Accessibility For People With Different Impairments Or Health Conditions, As Well As Older People With Mobility Requirements.**

In regard to accessibility, Dartford Town Centre benefits from excellent links via the rail, bus, and road network that connect it with the rest of Kent, the South East and London, as well as areas north of London including St Albans and Luton. It does not however benefit from a high-speed rail link to London.

The Town Centre benefits from a total of 24 bus services which provide access to the surrounding residential areas, as well as Darent Valley Hospital, Bluewater, Ebbsfleet and Gravesend Town Centre.

There are also a number of car parks for visitors to the Town Centre. Further, much of the Town Centre along High Street is pedestrianised, providing ease of access for those with limited mobility.

8 **Perception Of Safety And Occurrence Of Crime**

At the time of the site visit, during the day, there was a good perception of safety within the Town Centre, and the occurrence of crime was perceived to be low.

According to [www.police.uk](http://www.police.uk), the 177 crimes were recorded within the Orchard Area, which covers much of the Town Centre, in August 2022, including 45 for violence and sexual offences, 26 for shoplifting, 43 for anti-social behaviour. According to the 2021 Retail Study, the main hotspots for crime within Dartford are the 'pinch points' where Market Street, High Street and Spital Street meet.

9 **State Of Town Centre Environmental Quality**

Environmental quality in the Town Centre was considered to be relatively strong at the time of the site visit, given that the Town Centre is covered by the largest Conservation Area in the Borough. The Town Centre is home to a total of 38 listed buildings and structures which help to create a distinctive historic urban character.



	<p>There are a number of important strategic public spaces that contribute towards the Town Centres overall environment. These include Central Park which provides an attractive green space, the pedestrianised High Street, and the Station Concourse which acts as the main arrival point and gateway to Dartford.</p> <p>There is evidence that the Council is investing into improving these areas as part of its public realm strategy through the provision of a good level of street furniture, street decoration and public art, as seen by the image of the mural and bunting on the pictures above.</p>
10	<p><b><u>Balance Between Independent and Multiple Stores</u></b></p> <p>The Town Centre has a relatively good mix of both national multiples and independent businesses. The key comparison goods retailers include Poundland, Boots, Primark, Ryman, WH Smith, JD Sports and New Look. Prospect Place, a purpose-built development which sits to the north of the traditional centre, accommodates a number of major national multiples including Asda Living, B&amp;Q, Matalan and TK Maxx. Sainsburys in the Priory Centre is the main foodstore anchor, alongside Marks &amp; Spencer Food Hall, Aldi and Iceland.</p> <p>The centre also provides for a mix of independent retailer and food and beverage occupiers, although these are mainly located on the secondary streets and areas.</p>
11	<p><b><u>Extent To Which There Is Evidence of Barriers to New Businesses Opening and Existing Businesses Expanding</u></b></p> <p>The continued decrease in the vacancy rate suggest that new businesses have chosen to come to the Town Centre, with others potentially expanding. However, as fewer vacant units become available, there is less opportunity for businesses to locate to the centre. There are a range of vacant units in the town, although only four of these are over 400 sq. m in size, which presents a barrier to businesses looking for larger floorplates.</p> <p>The historical nature of the centre means that it could be difficult to provide for larger units within the traditional centre, as seen with the development of Prospect Place which provides the main concentration of larger units within the town.</p>
12	<p><b><u>Opening Hours/Availability/Extent To Which There Is An Evening And Night Time Economy Offer</u></b></p> <p>The majority of main town centre are limited to daytime / early evening activities such as shopping and the supporting F&amp;B offer. However, Dartford does have a relatively strong evening economy, with a number of pubs, bars, clubs and restaurants. However, the restaurants are independent focused, with a clear lack on chain restaurants within the centre.</p> <p>There is also the Orchard Theatre, although there are very few other cultural / leisure uses within the town open into the evening.</p>

# APPENDIX 8.0

**THE HIVE**

**LOCAL**

**CENTRE**

**HEALTH**

**CHECK**

Gravesham Borough Council




<b>CENTRE:</b>	<b>The Hive Local Centre</b>
<b>LOCAL AUTHORITY:</b>	<b>Gravesham Borough Council</b>
<b>DATE UNDERTAKEN:</b>	<b>Wednesday 10 August 2022</b>

1.	<p><b><u>Diversity Of Uses</u></b></p> <p>The range of retail uses at The Hive Local Centre is fairly be limited given its size, comparison 13 units in total. However, it does include a newsagent, laundrette, takeaway, charity shop and convenience store/ off licence.</p> <p>It is considered that the mix of retail uses at the Hive reflect the centre's primary role in serving residents.</p>
2	<p><b><u>Proportion Of Vacant Street Level Property</u></b></p> <p>At the time of the site visit, several of the units appeared to be closed. This suggests an increase from the time of the Gravesham Background Retail and Commercial Leisure Paper (October 2020) when just one vacant unit was identified. One further unit appeared to be closed, and there was one that could not be determined.</p>
3	<p><b><u>Customers' Experience and Behaviour</u></b></p> <p>The most recent Retail Study (2016) did not assess the customer experienter/ behaviour in detail, and a survey to understand this has not been undertaken in support of this application.</p>
4	<p><b><u>Retailer Representation and Intentions to Change Representation</u></b></p> <p>Given the nature of the centre, the retailer representation is limited, and dominated by service-led independent occupiers accommodating small units.</p> <p>The Gravesham Core Strategy Local Plan supports the expansion of the centre in line to support additional residential developments in the area. Such an expansion could provide an opportunity to improve the overall offer, an introduce national retailers, depending on the scale of the extension and the footprint of the new units.</p>

5	<p><b><u>Commercial Rents</u></b></p> <p>A PMA PROMIS report is not available for The Hive Neighbourhood Centre.</p>
6	<p><b><u>Pedestrian Flows</u></b></p> <p>Pedestrian footfall around the Hive was very limited at the time of the site visit, which much of the footfall involving groups of people congregating in the open space outside the shop frontages, rather than using the shops themselves.</p>
7	<p><b><u>Accessibility – This Includes Transport Accessibility and Accessibility For People With Different Impairments Or Health Conditions, As Well As Older People With Mobility Requirements.</u></b></p> <p>The centre is easily accessible on foot from the surrounding residential area. The primary points of access are to the south and west from High Street and Fisherman Hill respectively. Disabled access is also reasonable with ramped areas adjacent to steps to serve wheelchair users or more generally those with reduced mobility.</p> <p>The centre is served by a number of bus routes providing connections to the surrounding residential areas as well as Bluewater, Ebbsfleet and Gravesend. Northfleet Train station is also accessible on foot, being located approximately 180m to the south west.</p> <p>However, access for those travelling to the centre by car is more limited with a lack of dedicated space for parking.</p>
8	<p><b><u>Perception Of Safety and Occurrence of Crime</u></b></p> <p>The general perception of safety within the neighbourhood centre was average, and a few instances of vandalism were noted, albeit not in prominent locations, i.e. not on shop frontages.</p> <p>Further while there is a large area of open space outside shop units, as this is set back from the main road, natural surveillance levels are relatively limited.</p> <p>According to <a href="http://www.police.uk">www.police.uk</a>, the 179 crimes were recorded within the Stone Castle Area in August 2022, which covers includes The Hive, as well as Bluewater Shopping Centre, including 73 for shoplifting, 41 for violence and sexual offences, and 16 for anti-social behaviour.</p>
9	<p><b><u>State Of Town Centre Environmental Quality</u></b></p> <p>There was some evidence of community efforts with what appeared to be community-based planting, however these were in poor condition showing signs of insufficient upkeep.</p> <p>The public realm was in relatively poor condition due to lack of maintenance and proper upkeep, although the centre does provide dedicated seating, comprised of walling around planting areas.</p> <p>Overall, the centre feels dated and in need of investment to improve its appearance.</p>



	
10	<p><b><u><a href="#">Balance Between Independent and Multiple Stores</a></u></b></p> <p>There is only one national occupier in The Hive, a Costcutter convenience store. The remaining units were all occupied by independents.</p>
11	<p><b><u><a href="#">Extent To Which There Is Evidence of Barriers to New Businesses Opening And Existing Businesses Expanding</a></u></b></p> <p>The most discernible barrier to new businesses entering the centre is likely to include the size and number of the units, both of which are very limited, although typical of a Local Centre, meeting the day-to-day needs of a relatively small population, as well as the overall environmental quality and level of footfall.</p>
12	<p><b><u><a href="#">Opening Hours/Availability/Extent to Which There Is an Evening And Night Time Economy Offer</a></u></b></p> <p>The majority of units focused on daytime activities meeting the day-to-day needs of the immediate population. However, in the wider area outside of the Local Centre boundary, there is a pub and a restaurant which are open into the evening.</p>

# APPENDIX 9.0

# BLUEWATER SHOPPING CENTRE HEALTH CHECK

Gravesham Borough Council



<b>CENTRE:</b>	<b>Bluewater Shopping Centre</b>
<b>LOCAL AUTHORITY:</b>	<b>Dartford Borough Council</b>
<b>DATE UNDERTAKEN:</b>	<b>Wednesday 10 August 2022</b>

<b>1.</b>	<p><b><u>Diversity Of Uses</u></b></p> <p>Bluewater is a major comparison-led goods shopping centre, focussing on the mid-high end retail market. The convenience retailers present within Bluewater are high-end retailers that cater towards the health and gift markets, including Hotel Chocolat, Godiva Chocolatiers and Holland &amp; Barrett, as well as the convenience offer within Marks and Spencer and the Waitrose Food Hall with John Lewis.</p> <p>The centre accommodates three large department stores as well as over 300 shops, including a range of retailers including high-end occupiers such as Apple, L'Occitane, LK Bennett, Molton Brown and The White Company.</p> <p>Bluewater also includes a over 60 large variety of restaurants, as well as a 17-screen cinema, and other leisure activities including a trampoline park, and a zip-wire and a nature trail.</p>
<b>2</b>	<p><b><u>Proportion Of Vacant Property</u></b></p> <p>On the day of the site visit Bluewater had a total of 40 vacant units out of 347. This figure equates to an 11.5% vacancy rate. This is an increase from the time of the 2021 Dartford and Ebbsfleet Retail Study, which noted that the number of vacancies fell from 31 units in July 2010 to just 15 in November 2015, rising again to 28 in 2019, representing an overall vacancy rate of 8.7%.</p> <p>Some of these vacancies have resulted from the recent market conditions, including the closure of the Forever 21 and Topshop / Topman stores.</p>
<b>3</b>	<p><b><u>Customers' Experience and Behaviour</u></b></p> <p>The 2021 Retail Study did not contain any data on customer's views and behaviour, and a survey to understand this has not been undertaken in support of this application.</p> <p>However, during the site visit it was observed that there was a diverse range of visitors, including many families.</p>

4	<p><b><u>Retailer Representation and Intentions to Change Representation</u></b></p> <p>Bluewater is largely characterised by a range of national multiples retailer representation, with a focus on a mid-high end retail offer.</p> <p>Bluewater predominantly caters for the sale of comparison goods, which comprise 59% of the total outlets. The shopping centre is anchored by three main department stores, namely John Lewis, House of Fraser and Marks &amp; Spencer. In addition, the shopping centre is also home to a variety of high end and high street fashion retail. Retail occupiers within Bluewater include Apple, Boots, Dyson, Primark, JD Sports and Zara.</p> <p>The main convenience representation at Bluewater is M&amp;S and Waitrose. Outside of this, the convenience offering is mainly characterised by small scale food and convenience.</p> <p>In terms of cafes, restaurants and pubs, there are a large selection of national occupiers, including Pizza Express, McDonalds, Nando's, Bella Italia, Pizza Hut and Café Rouge. These cater for both the daytime and evening trade, with many of the restaurants open until 10 and 11pm.</p>
5	<p><b><u>Commercial Rents</u></b></p> <p>The latest PMA PROMIS report indicates that Bluewater achieved an estimated Prime Zone A retail rent of approximately £280 per sq. ft, significantly above both Dartford and Gravesend Town Centres.</p> <p>Although this does represent a decline in prime rents since 2017 of -28.2%, this is lower than the PROMIS average rate of decline of -34.9%.</p>
6	<p><b><u>Pedestrian Flows</u></b></p> <p>The Shopping Centre was fairly busy throughout at the time of the site visit, although footfall is likely to have been impacted by the time of the visit, during the day on weekday.</p>
7	<p><b><u>Accessibility – This Includes Transport Accessibility and Accessibility For People With Different Impairments Or Health Conditions, as Well as Older People With Mobility Requirements.</u></b></p> <p>Although the centre itself does not have a train station, Bluewater is easily accessed by public transport with rail connections available from Greenhithe and Ebbsfleet stations, which provide services to Central and South East London, as well as Kent, including high speed services. Both train stations are accessible via a fast-track bus service which provide access between Bluewater, Dartford, Ebbsfleet and Gravesend.</p> <p>Bluewater has a dedicated bus station, providing bus services to a wide sub-regional area, including south east London, Gravesend, Chatham, Dartford, West Thurrock and other areas within Kent. Bluewater is also easily accessible by car and has around 13,000 free car parking spaces.</p>
8	<p><b><u>Perception Of Safety and Occurrence Of Crime</u></b></p> <p>There was a strong perception of safety within Bluewater, and the occurrence of crime was perceived to be low. The centre is well managed and is a safe environment with good CCTV provision and security surveillance.</p>

According to [www.police.uk](http://www.police.uk), the 179 crimes were recorded within the Stone Castle Area, which covers includes Bluewater Shopping Centre in August 2022, including 73 for shoplifting, 41 for violence and sexual offences, and 16 for anti-social behaviour.

9 **State Of Town Centre Environmental Quality**

Bluewater is a well-managed covered shopping centre that benefits from a clean, well maintained and high quality environment and public realm. There is a good provision of seating and planted areas within the malls that add to the overall quality of environment.

There is also a good provision of wayfinding and signage located around the centre. Outside of the covered malls Bluewater benefits from the attraction of lakes and play areas, all set within natural landscaped grounds. Overall the environmental quality is considered to be good.



10 **Balance Between Independent and Multiple Stores**

Bluewater is largely characterised by a strong representation of national multiple retailers, services and leisure operators. Although there are a number of independent retailers, the emphasis is very much on national operators.

11	<p><b><u>Extent To Which There Is Evidence of Barriers to New Businesses Opening and Existing Businesses Expanding</u></b></p> <p>There are a number of vacant units at the centre with differing floorplates, which offer opportunities for new and expanding businesses. However, the prime rents in comparison to other nearby centres could be a barrier, particularly for independent retailers.</p> <p>We understand that there is a part implemented planning consent which allows for the provision of additional retail and F&amp;B floor space, which could provide further opportunities for businesses if completed.</p>
12	<p><b><u>Opening Hours/Availability/Extent to Which There Is an Evening And Night Time Economy Offer</u></b></p> <p>Many of the retail shops are open to the public from 10am – 9pm Monday to Saturday, and from 11am – 5pm on Sundays. It therefore benefits from longer opening hours than the stores in nearby Dartford and Gravesend Town Centres.</p> <p>In addition, many of the leisure uses, including the cinema and restaurants are open later than the retail offer, until 10/11pm, meaning that they are able to act a destination in their own right, separate from the main retail use.</p>

**MONTAGU EVANS**

**70 ST MARY AXE**

**LONDON**

**EC3A 8BE**



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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.  
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.