

UNIT C

IMPERIAL RETAIL PARK, GRAVESEND

PLANNING AND RETAIL STATEMENT

11 AUGUST 2023



THIS IS THE CONTENTS

1. INTRODUCTION.....	3
2. THE APPLICATION SITE AND PLANNING HISTORY.....	5
3. THE PROPOSED DEVELOPMENT.....	8
4. PLANNING POLICY OVERVIEW.....	11
5. THE SEQUENTIAL TEST.....	17
6. OTHER PLANNING CONSIDERATIONS.....	23
7. SUMMARY AND CONCLUSIONS.....	25

APPENDIX 1 – SCHEDULE OF VACANT UNITS – GRAVESEND TOWN CENTRE

APPENDIX 2 – GRAVESEND, MAP OF VACANT UNITS

APPENDIX 3 – LETTER FORM FARMFOODS DATED 09 AUGUST 2023

1. INTRODUCTION

- 1.1 This Planning and Retail Statement has been prepared on behalf of Box+Ill Gravesend Limited, the owners of Imperial Retail Park in Gravesend ('the Site'). This application proposes a variation under Section 73 to widen the use of the ground floor of Unit C at the Site ('the Unit') in order to secure its re-occupation.
- 1.2 The purpose of the application is to allow the Unit to be occupied by Farmfoods. The Unit is currently vacant, having previously been occupied by Bensons until their closure in 2021. Therefore, the proposed development is being pursued in order to secure the long-term re-occupation of the Unit.
- 1.3 Unit C comprises approximately 928 sq. m of floorspace at ground floor, with a trading mezzanine floor of 449.2 sq. m. This application relates to the use of the ground floor only, with the use of the mezzanine unaffected by the proposal.
- 1.4 The Site is a well-established out-of-centre retail destination, which is well served by the highway network and public transport. The Site is very well connected to Gravesend Town Centre, being just a 10 minute walk away.
- 1.5 Farmfoods is an established specialist convenience goods retailer. The operator currently occupies a store in Gravesend Town Centre within the Thamesgate Shopping Centre. Their existing store measures just 470 sq. m size, and no longer meets Farmfoods' requirements for the Gravesend area. The new store will enable Farmfoods to better serve their existing customers, in a well-connected out-of-centre location, with good links to the Town Centre.
- 1.6 The operative planning permission for the Unit (LPA Ref. GR/92/124) restricts the retail sale of food from the Unit, and therefore, this application seeks to amend the current permission to allow Farmfoods to trade.
- 1.7 The description of development is as follows:

"Variation to Conditions 4 and 14 of Planning Permission ref. GR/92/124 to allow for the retail sale of food and ancillary non-food goods from Unit C"
- 1.8 In our opinion, the issues relevant to the determination of this application are limited and straightforward, and can be summarised as follows:
 - Is the proposed development situated in a sequentially preferable location?
 - Will the proposals give rise to any material changes in transport and car parking issues which will result in a 'severe' impact; and
 - Are there any other planning reasons why the development should not be permitted?
- 1.9 This Statement sets out how the relevant planning policies and other key material considerations to the determination of the application have been considered. It should be read in conjunction with other documents which have been prepared in support of this application.
- 1.10 The remainder of the Statement is structured as follows:

- 2. The Application Site and Relevant Planning History** – This section provides an overview of the Site and summarises the relevant planning history.

3. **The Proposed Development** – This section provides an overview of the development proposals, and of the proposed occupier, Farmfoods.
4. **Relevant Planning Policy** – This section identifies the relevant planning policy at a national and local level which the development proposals will be assessed against. At a local level, this includes the Statutory Development Plan for Gravesham, including the Local Plan Core Strategy and Local Plan Policies Map (2014) and the Local Plan First Review (1994) – saved Policies
5. **The Sequential Test** – Here we assess whether there are any other more centrally located sites capable of accommodating the development proposals.
6. **Other Planning Considerations** – This section assesses all other planning matters relating to the consideration of the application, including retail impact, transport, and socio-economic factors.
7. **Summary and Conclusions** – Finally we provide a summary of the key planning issues and conclusions of the assessment.

- 1.11 We conclude that the proposed development will allow Farmfoods to continue to trade from Gravesend, in a store that will better meet the needs of their customers. The development will deliver material socio-economic benefits by securing the long-term occupation of the Unit, providing secure employment opportunities to the local community.
- 1.12 This Statement will also demonstrate that the proposed development will widen consumer choice and increase competition at a sequentially preferable location, without having a significant adverse impact on the local highway network or on Gravesend Town Centre.
- 1.13 The development therefore accords with the relevant policies in the development plan. As there are no other material considerations to outweigh this conclusion, there is no reason to refuse permission. We therefore consider that planning permission should be granted.

2. THE APPLICATION SITE AND PLANNING HISTORY

THE SITE AND SURROUNDINGS

- 2.1 The Unit comprises approximately 928 sq. m GIA of floorspace at ground floor, with a trading mezzanine floor of 449.2 sq. m, and forms part of Imperial Retail Park. The Site is located within the administrative boundary of Gravesham Borough Council and is located just south of the River Thames. Gravesend Town Centre is located approximately 600m to the south east, approximately a 10-minute walk.
- 2.2 The immediate surrounding land uses are largely commercial retail warehouse units, alongside a number of industrial and logistics uses. Occupiers within the Imperial Retail Park are predominantly established national retailers including Lidl, B&Q, Halfords, Pets at Home and Tim Hortons, amongst others. The Site provides parking for approximately 409 vehicles.
- 2.3 The Unit is located towards the north eastern side of the Site. Immediately to the north is the Thames Path and the River Thames. There is a direct access between the Site and the Thames Path adjacent to Unit C, as shown on **Figure 2.1** below.



Figure 2.1 – View of Unit from Thames Path (source: Google Maps)

- 2.4 Customer access to the Site is from the Thames Way roundabout to the south, while HGV access to Unit C is via Clifton Marine Parade to the east. Immediately to the east of the rear service yard of the Unit are three six storey residential apartment blocks, known as Baltic Wharf.
- 2.5 In addition to the Town Centre pedestrian connectivity, the Site is also extremely well connected to the surrounding riverside residential areas via the Thames Path, which provides the Site with a strong level of pedestrian footfall and connectivity.

- 2.6 The closest train station to the Unit is Gravesend Railway Station which is a 12-minute walk (1 km), providing a direct connection to Central London, stations towards Faversham in Kent, and north of London to Luton. The station is also served by HS1, providing a high-speed rail link to London St Pancras via Ebbsfleet and Stratford.
- 2.7 The closest bus stops 'Lennox Road' are located on Overcliffe approximately 660m to the south of the Site which provide access to buses on Routes 306, 480 Sapphire, 490 Sapphire, AZ Fastrack, B Fastrack and S1. Additional stops can be accessed on Barrack Row and Garrick Street approximately 920m east of the Site.
- 2.8 The Site is well connected to the wider road network. Thames Way runs all the way from the Site to Ebbsfleet International Station, approximately 3km to the west. It also leads onto Springhead Road at Northfleet, providing access to the A2 which runs between South East London to the west and towards Rochester, Sittingbourne and Canterbury to the east.
- 2.9 The Site is located within Flood Zone 3, which means that it has a high probability of flooding from rivers and the sea, as shown on the map at **Figure 2.2** below.

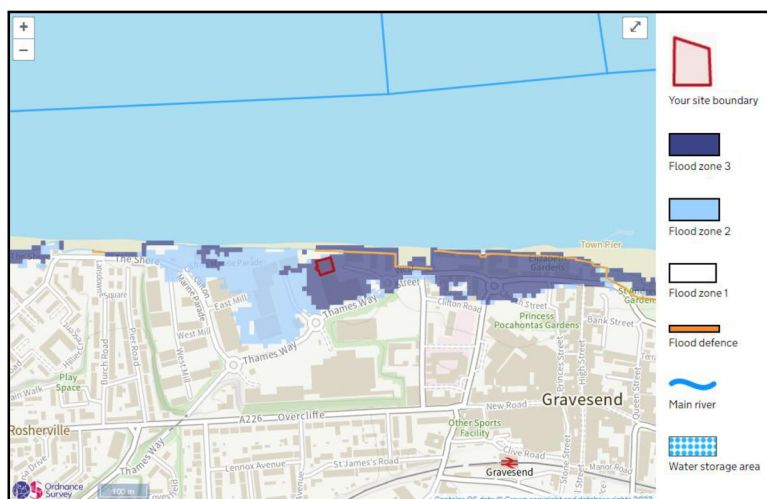


Figure 2.2 Source: <https://flood-map-for-planning.service.gov.uk/>

- 2.10 Gravesend Town Centre is located approximately 600m to the south east of the Site. Gravesend is an allocated Town Centre as set out within the Gravesham Core Strategy and comprises the primary retail focus within the Borough. The Site is well connected to the Town Centre with an established pedestrian route through Asda including escalators to take pedestrians up from the lower level to Overcliffe Road. This providing an excellent opportunity for linked trips between the Site and the Town Centre.
- 2.11 The Town Centre provides a mix of both comparison and convenience retail, 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 accommodates a number of multiple retailers including Tesco Express, B&M, Boots and Superdrug.

PLANNING HISTORY

- 2.12 Unit C forms part of Phase 2 of the Imperial Retail Park, which was approved under planning permission GR/92/124 on 31st March 1992 ('the 1992 permission'). The permission was subject to 20 conditions, and Condition 4 restricts the use of the Unit as follows:

"Notwithstanding the provisions of Article 3 of Class A1 of Part A of the Schedule to the Town and Country Planning (Use Classes) Order 1987 none of the retail floorspace hereby permitted shall be used for the sale of food, save with the prior permission, in writing, of the District Planning Authority."

2.13 Other conditions of the 1993 Permission relevant to the use of the Unit are as follows:

- Condition 6 precludes the subdivision of any unit at the park to a unit size of less than 474 sq. m;
- Condition 7 precludes the extension of a unit via the installation of mezzanine floorspace;
- Condition 13 restricted the total amount of floorspace to that shown on the submitted drawings; and
- Condition 14 further restricted the use of the Unit as follows:
 - *"The range of goods offered for sale from the retail units hereby permitted, save with the prior permission in writing of the District Planning Authority, be drawn from the following broad categories:*
 - *Do-it-yourself goods;*
 - *Electrical goods*
 - *Auto parts and car care product;*
 - *Household furniture;*
 - *Carpets; and*
 - *Garden sundries*

2.14 Planning Permission was granted at Appeal on 22 February 1995 ('the 1995 Appeal') for a variation to Permission Ref. GR/92/124 to allow the sale of food from Unit E (Appeal Ref. T/APP/K2230/A/94/24834/P5). Although the Applicant only applied to vary Condition 4 restricting the sale of food, the Inspector noted that Condition 14 relating to permitted sale of non-food goods would also need to be varied.

2.15 Notwithstanding that the permission comprised a variation to the baseline permission for the Site, the Inspector did not reattach all of the relevant planning conditions to the Decision. Instead, Conditions 4 and 14 were replaced with the following restrictive condition in relation to Unit E2 (now Poundstretcher) only:

2. The use of Unit E2 shall only be used for retail purposes within Class A1 of Part A of the Schedule to the Town and Country Planning (Use Classes) Order 1987 and for no other purpose.

2.16 Planning Permission Ref. GR/03/224 was granted on 19 May 2003 for the installation of a mezzanine floor for part sales area and part storage within Unit C. The permission did not contain any conditions relating to the use of the mezzanine floor.

2.17 On 21 July 2020, Planning Permission Ref. 20200452 was permitted for the part change of use of Unit C from fully Class A1 to Class A1 (Retail Use) and Class D2 (Gymnasium) following subdivision of the Unit and reconfiguration of mezzanine floorspace within the subdivided unit. An associated external alterations permission (LPA Ref. 20200450) was approved in conjunction with this permission. However, neither permission was implemented, and therefore now expired.

2.18 Taking account of the above, the original 1992 Permission remains the operative permission for Unit C.

3. THE PROPOSED DEVELOPMENT

3.1 This application seeks to vary Conditions 4 and 14 of Planning Permission Ref. GR/92/124 to allow for the sale of food alongside ancillary non-food goods from the ground floor of Unit C (928 sq. m). The use of the existing mezzanine floor will be unaffected by the development.

3.2 The current wording of Conditions 4 and 14 Planning Permission Ref. GR/92/124 are worded as follows:

"Notwithstanding the provisions of Article 3 of Class A1 of Part A of the Schedule to the Town and Country Planning (Use Classes) Order 1987 none of the retail floorspace hereby permitted shall be used for the sale of food, save with the prior permission, in writing, of the District Planning Authority"

"The range of goods offered for sale from the retail units hereby permitted, save with the prior permission in writing of the District Planning Authority, be drawn from the following broad categories:

- *Do-it-yourself goods;*
- *Electrical goods*
- *Auto parts and car care product;*
- *Household furniture;*
- *Carpets; and*
- *Garden sundries*

3.3 This application seeks to consolidate these into a single planning condition, and amend to allow the sale of food from Unit C. The proposed change will also incorporate the variation to Unit E2, as approved by the 1995 Appeal, as follows:

"Except for Unit E2, the retail units hereby permitted cannot be used for the sale of food, save with the prior permission in writing of the Local Planning Authority. Further, the retail units can only be used for the sale of goods drawn from the following broad categories, save with the prior permission in writing of the Local Planning Authority:

- *Do-it-yourself goods;*
- *Electrical goods*
- *Auto parts and car care product;*
- *Household furniture;*
- *Carpets; and*
- *Garden sundries*

In addition, Unit C can be also used for the retail sale of food with ancillary non-food retail within Class E(a) of Part A of the Schedule to the Town and Country Planning (Use Classes) Order 2020

The use of E2 shall only be used for retail purposes within Class E(a) of Part A of the Schedule to the Town and Country Planning (Use Classes) Order 2020, and for no other purpose".

- 3.4 The application relates to the use of the ground floor of Unit C only, and there is no proposed change in the quantum of the floorspace at the Site.
- 3.5 The Unit has been vacant since 2021, when Bensons closed their store. The development will enable the reoccupation of the Unit by Farmfoods.
- 3.6 Farmfoods currently operate a store in the Thamesgate Shopping Centre in Gravesend Town Centre, with their current lease due to expire in March 2025. However, the store is only 470 sq. m and is therefore too small to accommodate their current business model requirements for Gravesend.
- 3.7 Given the lack of suitability and upcoming lease expiry, Farmfoods have identified a requirement for a larger store in the Gravesend area. As a family owned business, they need to ensure their long term viability by continuing to provide a competitive offering against the major food retailers such as Asda, Lidl, Aldi, and Morrisons.
- 3.8 The 928 sq. m ground floor of Unit C at Imperial Retail Park has been identified as an appropriate size that will provide room for their full product offering and the space for a pleasant shopping experience. The Site will also provide free car parking immediately adjacent to the Unit, which again will enable Farmfoods to compete against the major food retailers. This is in contrast to the paid parking at Thamesgate, accommodated in a multi storey car park above the Shopping Centre, which can cause issue for shoppers carrying heavy bags.

Overview of the Farmfoods Business Model

- 3.9 The UK food store market comprises four key sectors; superstores; secondary foodstores; limited assortment discount retailers (LADs) and convenience stores and specialists.
- 3.10 Superstores are typically operated by the largest four supermarket operators (Tesco, Sainsburys, Asda and Morrisons) and comprise large floor plates in excess of 2,500 sq. m, with some ranging as large as 10,000 sq. m, offering a comprehensive range of food goods, often with a range of ancillary and non-food goods.
- 3.11 Secondary foodstores are generally smaller typically ranging between 500 sq. m and 3,000 sq. m, with typical operators including Waitrose, M&S, and Co-op. The stores provide less choice and less ancillary products.
- 3.12 The main LADs operators in UK are Lidl and Aldi. The stores typically range between 1,000 sq. m and 2,500 sq. m, offering a limited range of 'essential' products.
- 3.13 The convenience stores and specialists' sector can be split into two parts. Convenience stores comprise much smaller stores typically located in busy centres with high footfall serving as a top up facility. Outlets such as Tesco Express, M&S Simply Food and Sainsbury's Local have adapted their larger format stores to enter and serve the convenience market.
- 3.14 Other specialist formats include frozen food retailers (such as Iceland and Farmfoods) and these account for a smaller proportion of the overall grocery market.
- 3.15 Iceland (trading as 'Food Warehouse') and Farmfoods have now started to operate larger format stores that provide improved consumer choice and variety, these stores compliment more traditional food retail provision. The new format stores occupy large format retail premises and enable the companies to cater for larger shopping trips including some 'bulky buy' offers. The stores require dedicated customer parking reflecting the larger and bulky basket size.

- 3.16 Farmfoods is a specialist convenience goods retailer which operates from a range of traditional high street, standalone or large format retail locations. They specialise in the sale of frozen foods, often described as freezer centres. They also sell a range of non-frozen goods including dry, packeted, and tinned products plus a small range of ambient and fresh lines. Farmfoods does not sell alcohol, cigarettes or lottery tickets, nor does it provide dedicated instore facilities such as bakeries or delicatessen counters. Each store is convenience food focused with only a very minor level of ancillary comparison goods items sold.
- 3.17 Farmfoods' current business model requires larger format Foodstore style units to accommodate its full range of frozen and ambient convenience goods. The offer is designed for the destination led trolley/main-food shopper. Consequently, Farmfoods customers must visit other shops and services to complete their regular food shopping requirements during a normal week. A letter from Farmfoods is enclosed in Appendix 3.0 of this document setting out the specific requirements of their business model.
- 3.18 The introduction of an improved budget frozen foods specialist supermarket will complement and improve the existing supermarket provision in Gravesend. Although currently located within the Town Centre, Farmfoods have outgrown their current premises within Gravesend, and therefore the proposal will improve competition and consumer choice within the convenience goods market in the area.

Foodstore market in Gravesend and Surrounding Area

- 3.19 The Gravesend foodstore market comprises a range of operators across the majority of the sectors. Across the superstore and convenience store market Tesco and Asda have strong representation within the both the Town Centre and surrounding neighbourhoods and local centres. An Asda superstore is located within 200m to the south of the Site, and there are four Tesco Express stores within the Town Centre and other Local Centres to the south.
- 3.20 Lidl and Aldi both have representation within Gravesend, with Lidl also being located at Imperial Retail Park, and Aldi located on London Road, approximately 500m to the west of the Site.
- 3.21 In terms of specialist retailers there is limited diversity, particularly within the frozen goods market. Iceland has representation within the Gravesend area with a single store on the western edge of the Town Centre, while Farmfoods currently operates from a single undersized store within the Town Centre.
- 3.22 Within the wider area, the next closest Farmfoods store is located north of the River Thames River in Grays over 5km to the northwest. The introduction of an improved specialist frozen goods retailer would therefore provide increased consumer choice and competition in the market, complimenting the existing provision.

4. PLANNING POLICY OVERVIEW

- 4.1 This section sets out a planning policy overview relevant to the consideration of this application. We consider national policy contained in the National Planning Policy Framework 2021 (NPPF) and the accompanying guidance contained in the Planning Practice Guidance (PPG).
- 4.2 At a local level, we consider the statutory development plan comprises the following documents:
- Gravesham Local Plan Core Strategy and Local Plan Policies Map (Adopted 2014)
 - Gravesham Local Plan First Review (Adopted 1994) – Saved Policies
 - Kent County Council Minerals and Waste Local Plan 2013-30 (Adopted 2020)

NATIONAL PLANNING POLICY

- 4.3 The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to contribute to the achievement of sustainable development - performing economic, social and environmental roles. The three roles are interdependent and need to be mutually supported.
- 4.4 Paragraphs 7-11 confirm that at the heart of the NPPF is a presumption in favour of sustainable development. The planning system should therefore promote sustainable development solutions.

ECONOMIC GROWTH

- 4.5 Paragraphs 81-83 state that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Planning decisions should also recognise the specific locational requirement of different sectors.

TOWN CENTRES

- 4.6 Paragraphs 86-91 of the NPPF seek to ensure the vitality of town centres and requires 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. Paragraph 87 requires proposals to demonstrate compliance with the sequential test, and paragraph 89 to demonstrate that the proposals will not have a significantly adverse impact on any designated local centres.
- 4.7 LPA's should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. That is to say 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.

4.8 Details of how this policy should be applied are contained in the NPPF Planning Practice Guidance 2019 as well as relevant Secretary of State decisions, which are explored in more detail later in this Statement.

4.9 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 Planning Practice Guidance):

“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, preference should be given to accessible sites that are well connected to the town centre. It is important to set out any associated reasoning 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.

If there are no suitable sequentially preferable locations, the sequential test is passed.”

4.10 Paragraph 012 of the PPG guidance further states that the implementation of the sequential test should reflect the specific characteristics of the development proposals:

“Use of the sequential test 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”

4.11 With regards to retail impact, Paragraph 90 of the NPPF requires applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, to be supported by an impact assessment if the development is over a proportionate, locally set floorspace threshold. Where there is no locally set threshold, the default threshold is 2,500 sq. m of gross floorspace. The impact assessment should consider:

- a) 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
- b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

TRANSPORT

4.12 Transport issues should be considered from the earliest stages of development proposals. In assessing specific applications for development, it should be ensured that:

- Appropriate opportunities to promote sustainable transport modes can be taken up, given the type of development and its location;
- Safe and suitable access to the site can be achieved for all users; and
- Any significant impacts from the development on the transport network or on highway safety can be cost effectively mitigated and acceptable to a degree.

- 4.13 Paragraphs 110-113 of the NPPF confirms that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.14 All developments that will generate significant amounts of movement should be required to provide a Travel Plan and the application should be supported by a transport statement or transport assessment to enable the likely impacts of the proposal to be assessed.

SUSTAINABILITY

- 4.15 Paragraph 152 of the NPPF confirms that the planning system should support the transition to a low carbon future in a changing climate, including encouraging the re-use of existing resources, such as the conversion of existing buildings.

LOCAL PLANNING POLICY

GRAVESHAM LOCAL PLAN CORE STRATEGY (2014)

- 4.16 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.
- 4.17 **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.
- 4.18 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.
- 4.19 New retail and leisure development should be directed to the 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. However, Policy CS08 also states that where a case has been made for large format retail/commercial leisure development and no suitable sites can be identified following the application of the sequential approach set out above, the Council will support development in the West of Town Centre sub-area (3.2) as its preferred out of centre location for such development. Imperial Retail Park is included within the sub area recognised as being suitable for large format retail uses.

GRAVESHAM LOCAL PLAN FIRST REVIEW SAVED POLICIES (1994)

- 4.20 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

- 4.21 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).
- 4.22 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.
- 4.23 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.
- 4.24 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.
- 4.25 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) so no weight is afforded to it.

RETAIL AND COMMERCIAL LEISURE ASSESSMENT (2016)

- 4.26 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 Retail Study”.
- 4.27 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.
- 4.28 The Retail Study 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.
- 4.29 Excluding commitments, the Assessment identified a need for a at least a further 6,300 sq. m to 7,200 sq. m of net convenience floorspace in Gravesham by 2037. 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)

- 4.30 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.
- 4.31 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.
- 4.32 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.

SUMMARY OF PLANNING POLICY

- 4.33 In the context of the scale and type of development proposed, it is our opinion that the proposals should be considered against the following:
- ***Are the proposals for a scale of retail development appropriate?*** The proposed development is located within an established retail and commercial destination close to the Town Centre and relates to the re-use of an existing retail unit. The application will not result in an increase in floorspace at the Site. It is therefore considered to be of an appropriate scale.
 - ***Is the proposed development appropriate to the character and appearance of the site and the surrounding built environment?*** The proposed development comprises the internal refurbishment and re-use of an existing retail unit, improving the quality and vitality of the unit, contributing to the overall quality of commercial surroundings. There are no external alterations proposed by this application, and we therefore conclude that the proposals are fully compliant with regard to character and appearance.
 - ***Is the proposed development easily accessible, or capable of being made easily accessible, by a choice of means of transport, including by public transport, walking and cycling?*** The application site forms part of an existing retail and commercial destination that is very easily accessible by both public and private vehicles. The Site benefits from good pedestrian and cycle links to the residential areas surrounding the Site, and is less than a 10 minute walk from Gravesend Town Centre. As confirmed by the Transport Assessment the Site is accessible by all modes of transport.
 - ***Will the proposals comprise sustainable economic development?*** The development ensures that the Unit can be re-occupied by a new occupier, therefore maintaining and enhancing employment opportunities at the Site, and generally meet sustainable economic development objectives. As such, we conclude that the proposals are compliant in this regard.

- ***Are there any sequentially preferable sites?*** A sequential assessment has been undertaken and is set out within Section 5 of this Statement. The assessment has been undertaken on the basis of the specific occupier-led floorspace and business model requirements, which concludes that the Site is the most sequentially preferable for the proposed development.

5. THE SEQUENTIAL TEST

- 5.1 Paragraph 87 of the NPPF and Policy CS08 of the adopted Core Strategy require a sequential assessment to be undertaken for planning applications for main town centre uses, which are not in an existing centre, comprise an allocated site, or are in accordance with an up-to-date development plan.
- 5.2 Although the Site is allocated within an established retail and commercial area which is well connected to Gravesend Town Centre, it is necessary to consider the relevant national and local policy tests associated with widening the range of permitted goods to enable the sale of food from the Unit.

SCOPE OF SEQUENTIAL TEST

- 5.3 The sequential test means, wherever possible, seeking to focus new development within, or failing that, on well-located sites on the edge of existing centres. Only if in-centre or edge-of-centre sites are not available will out-of-centre locations be appropriate, provided they are acceptable in other respects.
- 5.4 Applying the sequential approach should have regard to the need, both 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 retailers 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.
- 5.5 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.
- 5.6 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 retailers 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.
- 5.7 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.

- 5.8 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"

- 5.9 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".

- 5.10 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.

- 5.11 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.'*

- 5.12 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.

- 5.13 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".

- 5.14 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.

- 5.15 In December 2014, the Communities and Local Government Committee assessed the operation of the NPPF and discussed where 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.

- 5.16 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)*

- 5.17 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.***

- 5.18 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.

- 5.19 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.

SCOPE OF THE SEQUENTIAL ASSESSMENT

- 5.20 The Site is a well-established retail destination, within a wider mixed retail and commercial area. Whilst located out-of-centre, the Site is extremely well connected and is within a ten minute walk of Gravesend Town Centre. The pedestrian link through the Asda supermarket to the south through to the Town Centre, means that there is a real scope for 'linked trips' with both the Asda and Town Centre stores, as well as with the other units within the Imperial Retail Park.
- 5.21 Furthermore, the variation of Condition 4 in particular is to meet the specific requirements of Farmfoods, the proposed occupier of Unit C. Although Farmfoods currently occupy a smaller 475 sqm store within Gravesend Town Centre, they have significantly outgrown their premises and are seeking a floor area almost double the size of the existing unit. The proposals would facilitate Farmfoods remaining in Gravesend, in a significantly enhanced unit, better meeting their operational needs, therefore improving consumer choice and competition.

- 5.22 The assessment of sequential sites has been undertaken using a methodology and scope which accords with the relevant local and national planning policies and guidance and the latest authority from case law, set out above.
- 5.23 The scale of the development has been driven by the requirements of the proposed occupier. Should the floorspace be any smaller, it would be unable to accommodate the proposals and compromise Farmfoods' business model and would therefore have an unacceptable commercial impact on the viability of the facility to operate. Any larger and the costs associated with additional rents and business rates again could prove unviable.
- 5.24 Farmfoods will operate from the ground floor of Unit C only, which comprises 928 sq. m. The application does not relate to the existing mezzanine which comprises 470 sqm, which will not be used by Farmfoods, as such has been excluded for the purposes of the sequential assessment.
- 5.25 As recognised above, there is no requirement to disaggregate the floorspace, as such the sequential test considers whole units, or units that are adjacent to one another that could be amalgamated. The assessment does not consider the possibility of occupying multiple units that are not adjacent to one another.
- 5.26 In identifying potential sites, the Applicant can consider the specific format of the development, the business model of the operator and the role and function it intends to meet. To demonstrate a degree of flexibility, we have applied a 10% tolerance in the size of proposed Unit C, i.e. the sequential test will consider units between 835 sq. m and 1,020 sq. m in size, across a single level. In addition, any site would need to be large enough to accommodate sufficient car parking and servicing arrangements.
- 5.27 Given the identified need is to create a larger store to better serve the residents of Gravesend, the sequential assessment considers Gravesend Town Centre only.

ASSESSMENT OF ALTERNATIVE SITES

GRAVESEND TOWN CENTRE

- 5.28 A site visit to Gravesend Town Centre was conducted on 12 July 2023, which provided an update to the previously published Goad data, whilst also using the opportunity to assess any other potential development sites across the centre.
- 5.29 The site visit identified a total of 75 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 1 and 2**. It should be noted that the Goad Plan, and therefore these figures, includes an area extending beyond the Town Centre boundary to the east beyond Queen Street and Parrock Street. As such the assessment primarily focuses on those units within the Town Centre Boundary, whilst also considering edge-of-centre sites and well connected out of centre locations.
- 5.30 Although there are a number of vacant units within Gravesend Town Centre, these are predominantly significantly below the minimum floorspace required by Farmfoods. There is only unit above the minimum threshold of 835 sq. m, the former Debenhams unit on New Road, which is assessed in detail below.

Former Debenhams, 74-76 New Road

- 5.31 The former Debenhams unit measures 2,900 sq. m in size, and forms part of the Thamesgate Shopping Centre which is accessed from both New Road to the north and Clive Road to the south. The unit is therefore substantially above the

floorspace threshold, extending to almost three times the maximum size floorspace that Farmfoods could viably operate from. The unit would therefore need to be subdivided and reconfigured to create a unit of an appropriate size. This would need to be undertaken as part of a comprehensive proposal and we are not aware of any proposals to reconfigure the floorspace, and there are no current planning applications at the site.

- 5.32 Furthermore the unit is not served by any surface level car parking, which is a key requirement of Farmfoods as outlined above. This, alongside the unit being too small, is one of the reasons why the existing Farmfoods unit, which is also located within the Thamesgate Shopping Centre, is no longer suitable. Whilst there is a multi-storey car park above the Shopping Centre, this does not provide the level access required to provide customers with a safe and usable route to transport their large shop sizes associated with the larger format store.
- 5.33 Therefore on the basis that the former Debenhams is substantially larger than the requisite floorspace of the operator, and that it does not provide appropriate customer vehicular arrangements, this unit can be discounted as a sequentially preferable site.

Vacant Units with the Potential to be Amalgamated

- 5.34 The next largest vacant units identified from the surveys comprise less than 600 sqm, which is 30% smaller than the minimum floorspace threshold. However, in the interests of robustness we have also considered the potential for amalgamating adjacent vacant units to provide the requisite minimum floorspace.
- 5.35 Although there are a few clusters of shops which could in theory be amalgamated to create a larger unit, even the largest amalgamation, which would be 24 and 25 St Georges Centre, would continue to fall substantially below the minimum floorspace requirements. Furthermore there is no nearby surface level car parking.
- 5.36 There is also a vacant unit adjacent to the existing Farmfoods store in the Thamesgate Shopping Centre. However, the unit comprises just 110 sqm, which could only result in a new amalgamated store of 580 sqm, again considerably below the minimum threshold.
- 5.37 Taking the above into account, we conclude that there is no opportunity within Gravesend Town Centre to amalgamate adjacent units to provide a sequentially preferable site.
- 5.38 As the development cannot be accommodated within the vacant units within the Town 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.
- 5.39 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, all of these Sites are allocated for substantial redevelopment, and the development of a single foodstore unit would not accord with the policy objectives. Furthermore this application relates to the reoccupation of an existing retail unit, which represents a much more sustainable form of development than constructing a new store and leaving an existing unit unused.
- 5.40 Taking account of well-located out-of-centre sites, Imperial Retail Park is located in a sustainable location, with good pedestrian and vehicular access, close to other retail and commercial uses with good access to Gravesend Town Centre. Local Plan Policy CS08 recognises this, and confirms that large format retail proposals that pass the sequential test should be directed to sub area 3.2 to the west of the Town Centre which includes Imperial Retail Park.

- 5.41 In the absence of any sites within or on the edge of Gravesend Town Centre, the Application Site is therefore the most sequentially preferable location for the development. It therefore follows that the sequential test is passed in respect of Gravesend.

SUMMARY AND CONCLUSIONS

- 5.42 The sequential assessment has considered whether there are any more centrally located sites that are available and capable of accommodating the floorspace associated with the proposed development. This assessment concludes that the application site is the most sequentially preferable site to accommodate the development. The application therefore accords with Policy CS08 of the adopted Core Strategy and Paragraph 87 of the NPPF.
- 5.43 The Site is located in a highly accessible established retail destination, located close to the Town Centre, and is recognised within the Local Plan as being a suitable location for large format retailing – Sub area 3.2.
- 5.44 We therefore conclude that given the lack of available sites within and edge-of-centre locations, the application site is the most sequentially preferable location for the development proposals.

6. OTHER PLANNING CONSIDERATIONS

- 6.1 In this section we consider the acceptability of the proposed development against other relevant national and local planning policy, including retail impact, sustainable economic development, and transport.

Retail Impact

- 6.2 Local Plan Core Strategy Policy CS08 seeks to protect and enhance designated Town and Local Centres by resisting proposals that would have detrimental impact on the continued function, vitality and viability of a centre. The policy states that retail proposals outside the Primary Shopping Area, exceeding 2,500 sq. m floorspace, will be subject to an impact assessment. This reiterates the 2,500 sqm threshold set out in the NPPF.
- 6.3 The applications relate to the widening of the permitted use for 926 sq. m of floorspace only within an existing retail unit. There is therefore no policy requirement to assess the potential impact of the development.

Sustainable Economic Development

- 6.4 Sustainable development is the cornerstone of the planning system under the NPPF. The application proposals relate to existing brownfield land and site within a well-established commercial destination within Gravesham. The proposal will result in the re-use of an existing building which is currently vacant and providing no jobs.
- 6.5 In terms of its location, the Site is situated within an accessible location, with excellent access to the road network and is within walking distance of the town centre. The Site's location also provides opportunities for linked trips with the existing retail provision within the immediate area including to the Town Centre which is within a 10 minute walk of the Site.
- 6.6 The proposed development will result in investment in the local area and the creation of approximately 25 jobs at the Unit in a range of full and part time positions. Farmfoods offers a dedicated training scheme for their employees. The proposals will therefore contribute to job creation, economic growth and investment within Gravesend and the wider area.

Highways

- 6.7 The application is supported by a Transport Statement (TS) prepared by TTP Consulting, which considers the potential impact of the proposals on accessibility and transport issues. The Statement confirms that the Site is accessible by a range of different transport modes, including public transport, private car on foot and by bike.
- 6.8 The Site has provision for 409 surface level car parking spaces including 17 disabled parking spaces. The proposals do not include any external alterations and therefore there is no change to the quantum of parking spaces. The TS confirms that there could be demand for a further 10 – 15 spaces each hour across the day with a peak of 33 spaces. However this remains within the capacity of the existing parking provision, as such it is unlikely to affect the availability of parking under normal operating conditions.

- 6.9 The TS also analyses the potential changes in trip generation in respect of customer and servicing trips. The Statement confirms that there could be an additional 10 to 17 movements each way along Thamesway to the east of the Park, with an additional 2 to 7 movements each-way along Thamesway west of the Site, and that these levels of increase would not impact the operation of the local highway.
- 6.10 Therefore the proposed development is likely to have a negligible impact on the local highway, and therefore accords with Local Plan Policy CS14.

7. SUMMARY AND CONCLUSIONS

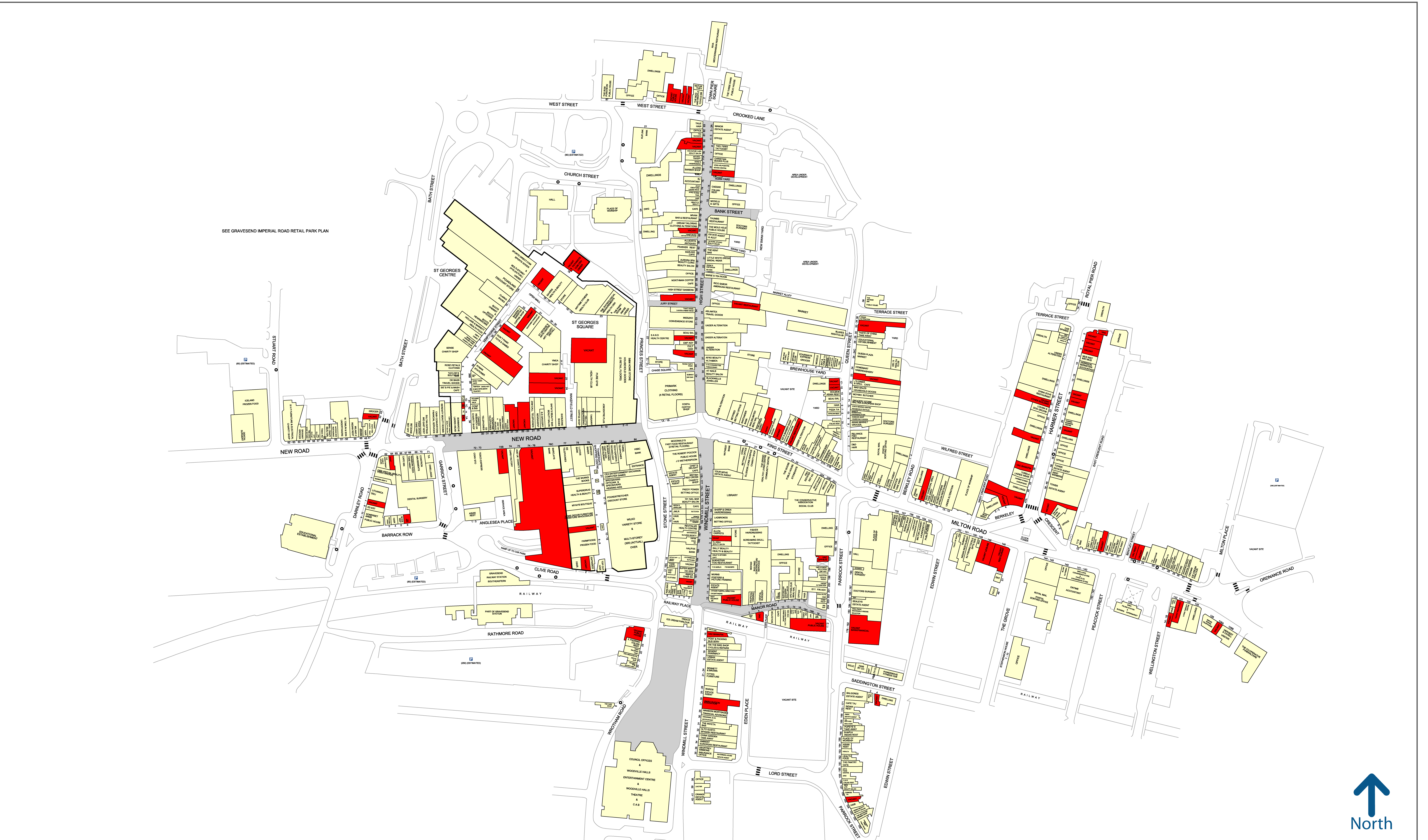
- 7.1 This Planning and Retail Statement has been prepared in support of an application for the variation of Conditions 4 and 14 of planning permission GR/92/124 in order to allow for the sale of food and ancillary non-food sales from the ground floor of Unit C at Imperial Retail Park. The application is submitted to facilitate the occupation of the Unit by Farmfoods. The application does not relate to the mezzanine floor within the unit, and therefore only applies to the 928 sq. m at ground level.
- 7.2 Farmfoods currently operate a store in Gravesend Town Centre. However this store is only 470 sq. m in size, and Farmfoods have now outgrown this unit. With their current lease due to expire in March 2025, and given the lack of suitability of the existing unit, Farmfoods have identified a requirement for a larger store in the Gravesend area.
- 7.3 The development will create approximately 25 jobs at the Site and represents a significant investment by the Applicant and Farmfoods, while at the same time securing the long-term occupation of the Unit.
- 7.4 This Planning and Retail Statement has considered the acceptability of the proposal against the relevant policies contained in the NPPF and the Development Plan policy, and concludes the following:
- The Site is an established designated out-of-town retail destination in Gravesend, recognised as being suitable for large format retail as identified in Local Plan Policy CS08;
 - The proposed development will deliver significant investment into the local economy by way of new employment opportunities;
 - The sequential assessment concludes that there are no sequentially preferable sites within Gravesend Town Centre capable of accommodating the development;
 - The development presents sustainable development, resulting in the enhancement and re-occupation of an existing retail unit, in an accessible location; and
 - The proposed development is acceptable in all other respects.
- 7.5 Accordingly, we conclude that the application fully accords with both national and local planning policy and should therefore be considered favourably by the Council.

Appendix 1

Gravesend Town Centre - Schedule of Vacant Units

Street Number	Road Name	Postcode	Use Class	Primary Activity	Goad Area_m2	Trading Floors
1A	ST GEORGES CENTRE, KEMPTHORNE STREET	DA11 0TA	E/F.2	VACANT	10	1
1C	ST GEORGES CENTRE , KEMPTHORNE STREET	DA11 0TA	ESG	VACANT ASG	10	1
131	MILTON ROAD	DA12 2RQ	E	VACANT RESTAURANT	100	1
15	KING STREET	DA12 2EB	E	VACANT RESTAURANT	100	1
7	THAMESGATE SHOPPING CENTRE	DA11 0AU	E/F.2	VACANT	110	1
34	ST GEORGES CENTRE, KEMPTHORNE STREET	DA11 0TA	E/F.2	VACANT	110	1
	HIGH STREET	DA11 0AZ	E	VACANT RESTAURANT	120	1
9	MILTON ROAD	DA12 2RE	E/F.2	VACANT	120	1
32	ST GEORGES CENTRE , ST GEORGES SQUARE	DA11 0TB	E/F.2	VACANT	120	1
20	ST GEORGES CENTRE, NEW ROAD	DA11 0AA	E/F.2	VACANT	120	1
1	MANOR ROAD	DA12 1AA	ESG	VACANT PUBLIC HOUSE	130	1
153	MILTON ROAD	DA12 2RG	ESG	VACANT PUBLIC HOUSE	130	1
	WEST STREET	DA11 0BL	ESG	VACANT PUBLIC HOUSE	140	1
31	HARMER STREET	DA12 2AP	E/F.2	VACANT	150	1
24	STONE STREET	DA11 0NP	ESG	VACANT PUBLIC HOUSE	150	1
4	THAMESGATE SHOPPING CENTRE	DA11 0AU	E/F.2	VACANT	150	1
24 - 25	ST GEORGES CENTRE , NEW ROAD	DA11 0AA	E/F.2	VACANT	160	1
	ST GEORGES CENTRE , NEW ROAD	DA11 0AA	E/F.2	VACANT	160	1
72B	NEW ROAD	DA11 0AF	E/F.2	VACANT	160	1
6	BERKLEY CRESCENT	DA12 2AH	E/F.2	VACANT	160	1
21	HARMER STREET	DA12 2AX	UC	VACANT OTHER BUILDING	180	1
14 - 15	ST GEORGES CENTRE, ST GEORGES SQUARE	DA11 0TB	E/F.2	VACANT	190	1
16 - 17	KING STREET	DA12 2EB	E	VACANT RESTAURANT	190	1
148	MILTON ROAD	DA12 2RG	F.2	VACANT LEISURE	220	1
22 - 23	ST GEORGES CENTRE , NEW ROAD	DA11 0AA	E/F.2	VACANT	220	1
14	QUEEN STREET	DA12 2EE	E/F.2	VACANT	230	1
25	ST GEORGES CENTRE, WAKEFIELD STREET	DA11 0TD	E/F.2	VACANT	240	1
27 - 28	WINDMILL STREET	DA12 1AX	E	VACANT BANK/FINANCIAL	240	1
27 - 28	HIGH STREET	DA11 0AZ	E/F.2	VACANT	240	1
146	MILTON ROAD	DA12 2RG	E	VACANT RESTAURANT	250	1
24	ST GEORGES CENTRE, WAKEFIELD STREET	DA11 0TD	E/F.2	VACANT	250	1
32 - 34	QUEEN STREET	DA12 2EE	E/F.2	VACANT	260	1
47A	HARMER STREET	DA12 2AP	E/F.2	VACANT	280	1
1 - 2	PARROCK STREET	DA12 1EW	ESG	VACANT PUBLIC HOUSE	290	1
74 - 76	NEW ROAD	DA11 0AF	E/F.2	VACANT	2900	1
	TERRACE STREET	DA11 0TA	E/F.2	VACANT	30	1
5	THAMESGATE SHOPPING CENTRE	DA11 0AU	E/F.2	VACANT	320	1
37	ST GEORGES CENTRE, KEMPTHORNE STREET	DA11 0TA	E/F.2	VACANT	390	1
4	SADDINGTON ROAD	DA12 1ED	E/F.2	VACANT	40	1
3	SADDINGTON STREET	DA12 1ED	E/F.2	VACANT	40	1
6	BARRACK ROW	DA11 0RT	E	VACANT RESTAURANT	40	1
15	QUEEN STREET	DA12 2EQ	E/F.2	VACANT	40	1
1A - 1B	WELLINGTON STREET	DA12 1JA	E/F.2	VACANT	40	1
4	MANOR ROAD	DA12 1AA	E/F.2	VACANT	40	1
17	QUEEN STREET	DA12 2EQ	E/F.2	VACANT	40	1
197	PARROCK STREET	DA12 1EW	E	VACANT OFFICE/BUSINESS	50	1
155	PARROCK STREET	DA12 1ER	E/F.2	VACANT	50	1
128A	MILTON ROAD	DA12 2PG	E/F.2	VACANT	50	1
178 - 182	PARROCK STREET	DA12 1ES	E	VACANT BANK/FINANCIAL	540	1
	ST GEORGES CENTRE , NEW ROAD	DA11 0AA	E/F.2	VACANT	580	1
	WEST STREET	DA11 0BL	E/F.2	VACANT	60	1
42	BATH STREET	DA11 0DE	E/F.2	VACANT	60	1
22	MILTON ROAD	DA12 2RF	E	VACANT RESTAURANT	60	1
160	WINDMILL STREET	DA12 1AH	E/F.2	VACANT	60	1
	WEST STREET	DA11 0BL	E/F.2	VACANT	60	1
7	DARNLEY ROAD	DA11 0RU	E/F.2	VACANT	60	1
66	HIGH STREET	DA11 0BB	E/F.2	VACANT	60	1
2	WINDMILL STREET	DA12 1AD	E/F.2	VACANT	70	1
49	HIGH STREET	DA11 0AY	E/F.2	VACANT	70	1
16	WINDMILL STREET	DA12 1AS	E	VACANT BANK/FINANCIAL	70	1
80	HIGH STREET	DA11 0BH	E/F.2	VACANT	70	1
12	KING STREET	DA12 2EB	E/F.2	VACANT	80	1
38	WINDMILL STREET	DA12 1BA	E/F.2	VACANT	80	1
18	MILTON ROAD	DA12 2RF	E/F.2	VACANT	80	1
18	HARMER STREET	DA12 2AX	UC	VACANT OTHER BUILDING	80	1
2	THAMESGATE SHOPPING CENTRE , CLIVE ROAD	DA11 0AU	E/F.2	VACANT	80	1
6	HARMER STREET	DA12 2AX	E/F.2	VACANT	80	1

46	HIGH STREET	DA11 0AY	E/F.2	VACANT	90	1
20	HARMER STREET	DA12 2AX	E/F.2	VACANT	90	1
4	HARMER STREET	DA12 2AX	E/F.2	VACANT	90	1
28	HARMER STREET	DA12 2AX	E/F.2	VACANT	90	1
39	HARMER STREET	DA12 2AP	E	VACANT BANK/FINANCIAL	90	1
2	HARMER STREET	DA12 2AX	E/F.2	VACANT	90	1
10	HIGH STREET	DA11 0BQ	E/F.2	VACANT	90	1
4	BERKLEY CRESCENT	DA12 2AD	E/F.2	VACANT	90	1





Lucy Turner
Montagu Evans LLP
70 St Mary Axe
London
EC3A 8BE

9th August 2023

Dear Lucy

PROPOSED FARMFOODS STORE – Unit C, Imperial Retail Park, Gravesend
SUPPORTING STATEMENT

I refer to the above proposal and wish to confirm our strong support and commitment to the proposal subject of a planning application by Box+III Gravesend Limited.

As requested, this letter confirms that support together with explaining the operational and commercial reasons for requiring alternative premises to our current store in Gravesend Town Centre. We have agreed Heads of Terms on a subject to planning basis to occupy Unit C of the Imperial Retail Park. Subject to the outcome of the planning process, we hope to commence trading from early 2024.

About Farmfoods

Farmfoods Ltd is a privately owned retailer that specialises in the sale of frozen foods, often described as freezer centres. However, we also sell other dry, packeted, and tinned products, and a small range of ambient, fresh and non-food lines. We do not sell alcohol or cigarettes.

The business was founded in 1954 and is still owned by the Herd family, now under the leadership of the third generation. Based in Scotland we operate throughout Great Britain with stores from the north of Scotland down to Cornwall and Dover. We currently have approximately 340 stores.

Our customers come from two broad locations: walk-in and local – 'basket trade'; and destination trade which is car borne or taxi/public transport – 'trolley trade'. A typical customer profile for Farmfoods would be the same as for discount supermarkets like Aldi and Lidl – a working family with children who are budget conscious and purchase substantial volumes of groceries.

The key to the long-term viability and success of Farmfoods has been and continues to be a great value for money offering to our customers and a business focus on costs and efficiency. Rent and other property costs are a significant recurring cost and must be kept under control. Meanwhile, larger average-spend rates drive greater efficiency in our shops' operations. This is only achievable if customers have an ability to buy and transport large volumes to their cars. All new stores are over 6,000sqft and have adjacent car parking for trolley-to-car transfer of bulky groceries, rather like our competitors Food Warehouse, Lidl and Aldi.

Our store acquisition focus in the past 6-7 years has been on larger format premises, typically 6-10,000sqft but more recently 10,000sqft+ and as large as 21,000sqft. Regardless of size however,

a constant requirement is dedicated customer car parking. Our trading locations are often roadside close to large areas of housing.

We are delivering our requirements either through new stores in towns where we are not represented or via relocation of existing stores to improved viable trading locations. One such example is the closure of our former store in Woodseats District Centre, Sheffield to the nearby Woodside Retail Park. This was permitted in 2022 with Sheffield City Council being satisfied the relocation was acceptable in retail policy terms.

Our existing store in Gravesend

Our current store in Gravesend Town Centre is units 7-9 Thamesgate Centre. However, this no longer meets all of our trading requirements.

The current store is 4,657sqft and opened in 2000 with its size and configuration reflecting the type of store that we would occupy at that time but is now too small to meet operational and customer requirements. It cannot accommodate our full range of goods that customers expect. The existing store also suffers from poor visibility with no active main street frontage and the chargeable multi-storey car park acts as a further deterrent to customers and potential customers. These features leave us struggling to compete in an increasingly crowded convenience goods market in the Gravesend area.

Our proposed store in Gravesend

We are seeking a new store with a regular-shaped sales area of at least 929 sq.m (10,000 sq.ft), a prominent and visible trading location, easily accessible to customers by a variety of transport methods, access to ample free customer car parking and articulated HGV delivery capability.

Following a search, we have not been able to identify any alternative units in and on the edge of the Gravesend Town Centre so have identified the Imperial Retail Park as a suitable and viable option. We are committed to Gravesend and consider this unit to be the only suitable trading opportunity to maintain and also enhance our retail offering for the benefit of the town and our customers.

Our existing store employs 14 people (full and part-time). Our planned new store will create up to 10-15 new roles (a combination of full and part-time). Most employees will continue to originate from the local community.

I hope this statement provides you and the Council a sufficient overview of our existing and proposed retail operation in Gravesend. I would be pleased to accompany Council officers on a tour of our existing store in the Town Centre should it assist to better understand the trading position explained in this letter and why a new facility is being sought. I can also answer any questions about our proposals.

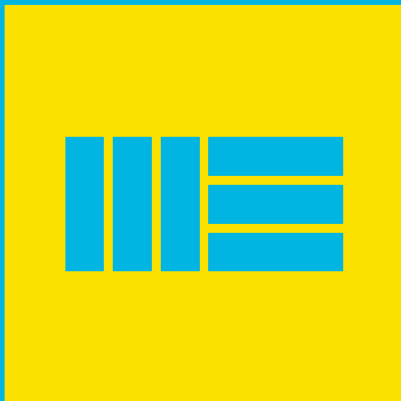
Yours sincerely

A large black rectangular box redacting the signature of the Property Director.

A
Property Director

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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.