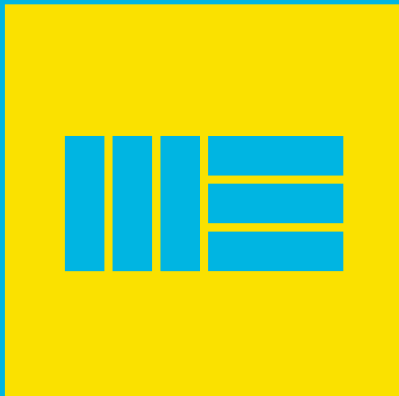


NORTHFLEET HARBOURSIDE

ADDENDUM RETAIL AND LEISURE STATEMENT

LPA REF. 20221064

29 AUGUST 2023



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1.0 INTRODUCTION

1.1 This Addendum Retail and Leisure (R&L) Statement (“the Addendum 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”). The Council’s planning reference for the application is 20221064.

1.2 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 are reserved and will be subject to reserved matters applications at a later date.

1.3 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.”

1.4 Northfleet Central 1 Limited 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.

1.5 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, alongside Food and Beverage (F&B) and other leisure uses to support residents and visitors to the Site.

1.6 A detailed Retail and Leisure Statement (‘the R&L Statement’) was submitted with the Application, which included an assessment of the proposed retail and food and beverage elements of the Proposed Development against the relevant planning policy. It identified the key retail and leisure policies at a national and local level, which are relevant to the consideration of the Application, and provided an assessment of the proposals against these key policies. The acceptability of the other commercial uses, including the proposed hotel and office space, was addressed in the accompanying Planning Statement

1.7 The Council has sought external advice on the application, including on retail and leisure matters, from Avison Young (AY). AY have provided a review of the application dated May 2023 (‘the AY Review’). Separately, comments have been provided by the Planning Policy Team at GBC, which also includes a review of retail and leisure policy matters, requesting additional information and clarification on several aspects of the submitted R&L Statement.

- 1.8 This Addendum Statement addresses the comments made by both AY and the Council's Planning Policy team, and in doing so concludes that the proposed development is fully in accordance with national and local retail and leisure policy. and should therefore be considered favourably.

2.0 PLANNING POLICY AND AVISON YOUNG COMMENTS

- 2.1 As set out above, GBC appointed AY to review the Application as a whole, including retail and leisure policy matters. The Council's Planning Policy team have also provided comments relating to the retail and leisure aspects of the application.
- 2.2 The key matters raised by both parties are set out below.

GRAVESHAM BOROUGH COUNCIL PLANNING POLICY COMMENTS

- 2.3 The Council have provided initial comments on the Proposed Development, dated 19 May 2023. In relation to retail and leisure matters, the following comments were made:
- The combined impact on other town centres of development at Ebbsfleet Central and Northfleet Harbourside needs to be assessed, having regard to all other commitments.
 - The Northfleet Harbourside application appears to ignore the extant Bluewater permission for a significant extension on the basis that the rest of the approved floorspace not yet constructed may not be delivered. In the interests of robustness, this should also be included in the assessment.
- 2.4 In relation to the first point, the R&L Statement included a cumulative impact assessment which considered the impact of both Ebbsfleet Central and the Proposed Development on the vitality and viability of the centres in the Catchment Area ('the CA'), in addition to Eastern Quarry. The assessment has been updated as part of this Addendum Statement.
- 2.5 Dartford Borough Council is currently considering an application for a change of use of a number of retail units at Bluewater Shopping Centre, to provide a hybrid leisure and restaurant, bar, and dining type uses, while at the same time significantly reducing the amount of Class E(a) retail floorspace (LPA Ref 23/.00429/COU).
- 2.6 Paragraphs 2.25- 2.27 of the Planning Statement submitted in support of the application discuss the previously approved extension permission, and Paragraph 2.27 confirms that:
- "The ability to secure the remaining balance of 24,871 sq.m NIA of consented retail floorspace has lapsed, a decision which the Applicant undertook due to limited demand for retail floorspace, further justifying the need for the centre to diversity and evolve as a regional and specialist shopping centre".*
- 2.7 It is therefore clear that the planning permission to extend Bluewater Shopping Centre for additional retail floorspace is no longer extant, and therefore does not need to be included in the assessment. Further, should the current change of use application be approved, the amount of retail floorspace at Bluewater will reduce by approximately 9,750 sq. m.
- 2.8 We are not aware of any other commitments which should be included as part of this cumulative assessment and have not been made aware of any by either the Council or AY. The updated impact assessment therefore continues to focus on the potential impact of Northfleet Harbourside, Ebbsfleet Central and Eastern Quarry only.
- 2.9 We therefore conclude that the queries raised by Gravesham Borough Council have been fully addressed in this Addendum.

AVISON YOUNG COMMENTS

- 2.10 AY produced their review of the application, titled “Northfleet Harbourside Masterplan Review” in May 2023. Appendix V of the Review focusses solely on the retail and leisure policy considerations of the Proposed Development.
- 2.11 Whilst AY agree with many of the key assumptions, it is their opinion that the R&L Statement does not provide a robust assessment to enable a conclusion on the sequential and impact policy tests to be reached. AY have made the following comments in respect of additional information / clarification that they would be seeking:

MATTERS RELATING TO THE SEQUENTIAL TEST

1. The scope of the sequential test to include the development as a whole has not been justified, as this includes a number of non ‘main town centre’ use. Further information is therefore required in relation to the Applicant’s approach to flexibility for scale and format when assessing alternative sites.
2. In order to justify the centres assessed, can the pattern of trade draw be provided?
3. It is unclear whether the assessment has concentrated on sites and premises in just town centre locations or whether edge and well located out-of-centre locations have been considered as well.

MATTERS RELATING TO IMPACT

4. There is a need to expand the financial impact assessment to include the proposed convenience element.
5. There is a need to expand the financial impact assessment to include the proposed food and beverage (F&B) floorspace element.
6. Confirmation from the application that it wishes the proposed comparison goods floorspace to sell all types of comparison goods without restriction.
7. Is there an opportunity to use more up-to date population forecasts rather than the ones contained in the 2016 Retail and Commercial Assessment
8. Is there an opportunity to update the expenditure data with the latest data from Experian.
9. Provide a full copy of the raw household survey data commissioned for this planning application.
10. Confirmation of whether there are any additional commitments which need to be included.
11. As part of its updated analysis, ME to provide a forecast pattern of trade draw for the comparison, convenience, and food/beverage floorspace from each of the study area zones.
12. Health Check Assessments updated to include information on Goad Categories and market share of retail and food/beverage categories.
13. Town Centre Investment – The Council to confirm whether there are any planned or committed investment projects which need to be assessed (N.B. no further details on projects to assess have been provided by the Council).

14. Given that Ebbsfleet Development Corporation (EDC) have raised concerns over the potential impact of the proposal planned investment at Ebbsfleet Central, further information and analysis on this issue is recommended (from both the Applicant and also EDC).

1.10 Finally, AY have suggested that it would be beneficial at this stage to consider any suitable conditions relating to the use of the retail and leisure floorspace which may be attached to the permission to help guide the application of the sequential and impact policy test, particularly in relation to:

- a) retail and food/beverage unit sizes;
- b) the range of retail goods to be sold;
- c) maximum net / gross floorspace quantum; and
- d) Any flexibility within Use Class E.

1.11 The above queries / comments raised by AY are addressed through the remainder of this Report.

3.0 THE SEQUENTIAL TEST

3.1 Section 3 of the AY Review includes a review of the sequential assessment contained within the submitted Retail and Leisure Statement. AY have requested additional information relating to the following.

1. The anticipated trade draw of development and appropriateness to justify only considering Gravesend and Dartford Town Centre for alternative sites;
2. Justification for the adopted methodology which includes the full development including all non-main town centre uses in the assessment of alternative sites, including:
3.
 - a. Further justification of the viability issues associated with the linkages between the main land use elements in light of non-town centre uses being included in the assessment of alternative locations; and
 - b. additional information on the approach to flexibility for scale and format when assessing alternative sites.
4. Confirmation of whether the assessment has concentrated on sites and premises in just town centre location or whether edge and well located out-of-centre locations have also been considered.

3.2 In addition, GBC have also requested a sequential assessment in relation to the office element of the development. The above matters are considered in turn below.

TRADE DRAW OF DEVELOPMENT AND SCOPE OF CENTRES ASSESSED

3.3 The AY Review also refers to the search area of sequentially preferable alternative sites, namely that the proposed development would have the potential to draw trade from a wider catchment than just Gravesend and Dartford Town Centres. As such, the AY Review suggests that although Gravesend and Dartford Town Centres should be the primary focus on the of the assessment, other defined centres *could* also be included.

3.4 It should be noted that Gravesend and Dartford Town Centres were specifically chosen as the primary focus based on the results of the Household Survey undertaken to support the Application. All other centres identified are either too small in scale or are located too far away from the Site to serve the same catchment. For ease of reference, the Catchment Area for the Proposed Development is set out at **Figure 3.1** below.

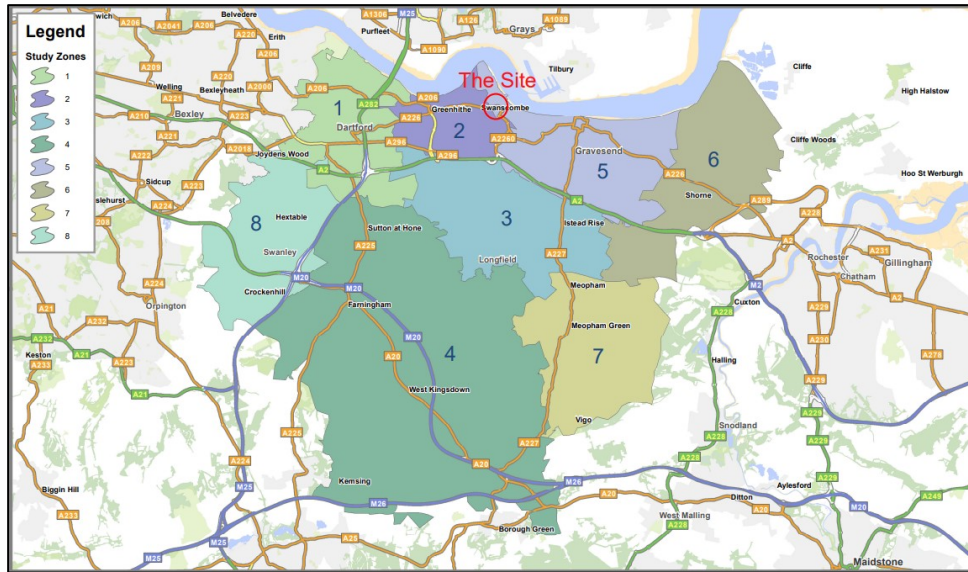


Figure 3.1 – Catchment Area of Proposed Development

3.5 A trade draw assessment was undertaken to underpin the retail impact tables contained within the R&L Statement. A copy of this is included in the updated retail impact tables at **Appendix 1** and replicated in **Figure 3.2** below for reference. This pattern of trade draw has been defined based on current shopping habits within the CA, based on the results of the Household Survey undertaken to support the 2016 Retail Study, and an assumption of trade from outside from the CA, primarily due to linked trips with the stadium use.

Zone	Trade Draw
	%
1 Dartford Zone	11.0%
2 Greenhithe / Swanscombe Zone	9.0%
3 Southfleet / Longfield Zone	5.0%
4 West Kingsdown Zone	7.5%
5 Northfleet / Gravesend Zone	37.5%
6 Shorne / Cobham Zone	2.0%
7 Meopham Zone	2.0%
8 Swanley Zone	1.0%
Other	25.0%
Total	100.0%

Figure 3.2 – Estimated Trade Draw to Proposed Development

3.6 The pattern of trade draw is expected to be similar for both the comparison and F&B uses, given that they are closely linked. The pattern of trade draw for the convenience floorspace is expected to be much more localised and focussed on Zone 5, with the primary role being to meet the day to day needs of those living and working in the immediate area. However, for reasons set out in Section 4, given that a detailed impact assessment has not been undertaken for the convenience floorspace, we have not set out the trade draw patterns for the convenience floorspace.

- 3.7 The pattern of trade draw confirms that the majority of the trade to the development is expected to come from the Gravesham and Dartford zones, with Gravesend and Dartford Town Centres being the only centres of an appropriate size to accommodate the scale of development proposed by the Application. Therefore, as agreed with the Council at the pre-application stage, it is appropriate that the sequential test focusses on these centres only.
- 3.8 We can also confirm that the sequential assessment has considered all town and edge-of-centre sites in these centres, including any allocations identified for retail uses in both the Gravesham and Dartford Development Plans. We have also had regard for potential sites in well located out-of-centre sites but are not aware of any such sites which are currently available and suitable for the Proposed Development. Neither GBC nor Dartford Borough Council have provided details of any potential alternative sites that should be considered

SCOPE OF USES INCLUDED IN SEQUENTIAL TEST

- 3.9 Paragraph 3.3 of the AY Review comments on the approach methodology of the sequential test, namely that the assessment of alternative sites focuses 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.
- 3.10 Paragraph 3.6 of the AY Review then sets out that the sequential test should apply to all proposals for main town centre uses which are not located within a defined 'town centre' and not in accordance with the development plan. The AY Review suggests that the approach taken in our sequential assessment is therefore an unusual one and that the applicant should look to only include the proposed main town centre uses (i.e. retail, service, food / beverage, hotel, office and indoor sport / recreation uses) within the sequential test, rather than the development as a whole (i.e. including residential and the multi-use stadium).
- 3.11 As set out in the supporting information to the planning application, the key role of the proposed retail and F&B uses is to complement the overall development and cater to both the new residents and visitors of the football stadium. A significant proportion of the planned economic activity will come from the residents, employees of the proposed offices and hotel, and football stadium attendees.
- 3.12 One of the key aims of the Proposed Development is to help to create a leisure destination, distinctly different to the offer in either Gravesend and Dartford Town Centres, with the retail and F&B uses helping to support the stadium use, both in terms of its viability but also complementary uses. The proposal must deliver a critical mass of floorspace of the appropriate scale and nature to ensure that it is distinctive from both Dartford and Gravesend Town Centres and has the ability to retain more spend in the Borough.
- 3.13 The proposed retail and F&B offering is therefore intrinsically linked to the viability of the proposed improvements to the stadium and the development as a whole, with the level of funding and investment required for the proposed improvements only achievable through the introduction of these supporting uses. Not only does the level of development proposed (i.e. residential, hotel, retail, F&B uses) allow for the funding of the improved stadium, the critical mass of visitors that will be drawn to the Site will support the non-football functions of the stadium, providing alternative sources of income for the football club.
- 3.14 It is therefore not considered either feasible or practical to separate these uses from the broader development. Separating the retail and F&B from the stadium use for example, would not result in the creation of a key leisure destination, and would therefore undermine the viability of the stadium, which will very much be supported by the F&B offer in particular, but also the retail.

- 3.15 Notwithstanding the above, in order to demonstrate flexibility in line with the comments within the AY Review, we have considered whether there are any alternative sites that are capable of accommodating the proposed 22,500 sq. m of retail floorspace in isolation with the 9,500 sq. m of F&B floorspace – i.e. up to 32,000 sq. m of Class E floorspace. This in addition to the other town centre uses, namely the indoor sport and healthcare space, local service uses, offices, community uses and hotels floorspace, which would result in a further 47,3000 sq. m of floorspace – 79,000 sq. m in total.
- 3.16 As confirmed by the sequential test submitted with the application, there are no clusters of vacant units in either Dartford or Gravesend Town Centres large enough to accommodate this scale of floorspace.
- 3.17 Within Gravesend Town Centre, the Heritage Quarter Key Site has been identified as capable of accommodating additional retail and F&B floorspace. However, the Gravesham Local Plan Core Strategy allocates the Site to provide approximately 10,500 sq. m of primarily comparison retail floorspace over the plan period. It would therefore not be large enough to accommodate even the retail, let alone all the town centre uses, if these were to be separated from the rest of the scheme. It can therefore be dismissed as a sequentially preferable site.
- 3.18 There are no allocated sites within Dartford Town Centre capable of accommodating the scale of floorspace proposed, as confirmed by the R&L Statement.
- 3.19 In terms of other allocations, the R&L Statement also considered the Ebbsfleet Valley Strategic Site, which proposes up to 10,000 new homes, a business district and associated leisure, retail and community facilities to support local residents. It is clear that the role of the retail and leisure uses in this location are focussed on meeting the needs of the new residents and workers. This contrasts with the Proposed Development, where the quantum of retail and leisure has been designed to support viability of the football stadium by creating a leisure destination, where visitors can combine a trip to the stadium with food, drink and retailing, in addition to meeting the day-to-day needs of the new and existing local residents and workers. This is demonstrated by the projected trade draw patterns, with just 37.5% of trade expected to come from the Northfleet / Gravesend area, with the remaining 62.5% from the wider area, including 25% from outside the Catchment Area.
- 3.20 The Ebbsfleet Central application proposes a similar amount of retail floorspace to that proposed at Northfleet Harbourside, circa 21,500 sq. m. However, the nature of this floorspace is different, with a much larger amount of convenience goods floorspace proposed. We note that the proposed retail floorspace also includes F&B uses, therefore the total amount of comparison floorspace will be significantly below the level within the Proposed Development. The level of comparison retail is expected to be closer to 12,500 sq. m GIA and will form a new District Centre, with larger scale units to serve the wider Ebbsfleet area. It is therefore clear that, even if the retail and F&B elements were separated from the rest of the development, Ebbsfleet Central could not be considered to be a sequentially preferable location for either the retail and other town centre uses, or the Proposed Development as a whole.
- 3.21 We are not aware of any other potentially sequential sites, and none have been suggested by either AY or GBC.
- 3.22 As set out in the R&L Statement, and recognised by AY, the sequential assessment considered sites which could accommodate the Proposed Development as a whole. However, as recognised above, even if the retail and F&B uses were considered in isolation, the conclusions of the sequential test would be the same in that there are no more centrally located available sites which are large enough to accommodate the relevant floorspace.

OFFICE USES

- 3.23 The Proposed Development includes up to 18,000 sq. m GEA of office uses (Class E(g)). As with the retail and F&B uses, the proposed office space is directly linked to the wider development, providing modern and sustainable workspace with a wider leisure and residential development. However, even if the office space were to be separated out from the other

town centre uses, which is not a requirement of planning policy, there are no sites located within wither Gravesend of Dartford Town Centres capable of accommodating this level of floorspace.

- 3.24 Further, the proposed office and employment uses within the Ebbsfleet Strategic Site is of a much more strategic scale, with the Ebbsfleet Central proposal currently under consideration proposing in excess of 100,000 sq. m GIA of business and office floorspace within the maximum parameters. It is therefore clear that the office floorspace proposed at Northfleet Harbourside is of a much smaller and nature, than that proposed within Ebbsfleet.
- 3.25 It is proposed that the office floorspace would serve international corporate companies who seek UK HQ office space in the context of rationalising their portfolios, whilst also demanding the best-in-class buildings that meet their ESG agenda. A schedule is provided within the Office Market Overview document which outlines instances where corporate companies have relocated to lesser established office markets, evidencing that where quality office space is provided, there is an associated occupier demand.
- 3.26 The Site is strategically placed to provide office floorspace given that Ebbsfleet International can be reached by train in just 18 minutes from St Pancras. It is however established within the submitted Office Market Overview document that the Northfleet office market is currently relatively unestablished. There is currently a restricted supply in the submarket, with the current office space requirements exceeding the availability.
- 3.27 Therefore, notwithstanding the fact that the office use forms part of the wider development, and should be assessed as such, it is concluded there are no more centrally located sites which could accommodate the proposed office floorspace.

SUMMARY AND CONCLUSIONS

- 3.28 In light of the above, we reaffirm our initial conclusions that the application site is the most sequentially preferable site to accommodate the Proposed Development. It follows that the proposal accords with Policy CS08 of the Gravesham Borough Council Core Strategy and Paragraph 87 of the NPPF.

4.0 THE IMPACT ASSESSMENT

4.1 Paragraph 4.1 onwards of the AY Review considers impact and, inter alia, additional information has been requested in respect of the following:

1. Quantitative impact assessment of convenience floorspace;
2. Quantitative impact assessment of food and beverage floorspace;
3. Clarification of type of comparison goods to be sold;
4. Update to population forecasts;
5. Update impact assessment with latest data from Experian;
6. Provision of full copy of the raw household survey data;
7. Inclusion of additional commitments;
8. Confirmation of Trade Draw of Proposal;
9. Update Health Check Assessments to include information on Goad Categories and market share of retail and food/beverage uses;
10. More information on potential impact on existing Town Centre Investment;
11. Additional information on cumulative impact with Ebbsfleet Central.

4.2 These matters are addressed in turn below.

CONVENIENCE IMPACT ASSESSMENT

4.3 It is anticipated that of the 17,100 sq. m of net retail floorspace proposed by the development, approximately 16,325 sq. m will be used for comparison goods sales. The remaining 855 sq. m will be used for convenience sales.

4.4 It is important to note that this will not be provided within a single unit, rather it will be spread around several small-format convenience stores as well as convenience floorspace as part of a larger non-food retail units. It is not anticipated that any single convenience unit will be above 280 sq. m in size.

4.5 The impact of the convenience floorspace was not assessed within the application on the basis that it is de-minimis in the context of the development. The level of convenience floorspace proposed also falls well short of the threshold for undertaking a retail impact assessment, which is set at 2,500 sq. m.

4.6 Further, the primary purpose of the convenience floorspace is to meet the day-to-day needs of those living and working the Site. The proposals will not include a large foodstore which will draw in trade from the wider area. Therefore any impact on the turnover of any of the nearby centres as a result of the floorspace will be negligible.

4.7 As confirmed by Table 6.1 of the R&L Statement, the residential element of the Proposed Development alone could generate up to £13.48m of convenience spend by 2032. This does not take include any additional spend generated by the office workers or those visiting the leisure facilities.

4.8 Based on a sales density of £11,000 per square metre at 2022¹, the convenience floorspace could have a turnover of approximately £8.6m in 2032 meaning that it can easily be supported by the residential uses alone, with additional capacity

¹ Taking account of Mintel Retail Rankings 2022 figures for Spar UK Ltd, Costcutter, M&S Food, Co-Op, Sainsbury's Local and Tesco Express. Grown to 2032 based on Table 1a of Experian Retail Planner Briefing Note 20 (February 2023)

for convenience spend within the wider area. Adopting a sales density of £11,000 per sq. m is considered to be robust, given that the turnover of small scale and independent retailers would be expected to be lower.

- 4.9 Therefore, although it would be possible to undertake an assessment of the convenience impact, it would be unnecessary to do so, as any diversion of trade from existing stores and centres would be more than off-set by the expenditure generated by the residential element of the development.
- 4.10 Further, given the nature of the proposed convenience floorspace, although a significant amount of trade is expected to be drawn from the immediate residential area to meet the day-to-day needs of the new residents, the remainder of trade is expected to follow the same trade draw patterns as the comparison and F&B floorspace set out at Figure 3.2 above, meaning that any trade diversion will be spread over a wide area and not focused on any single store or centre.
- 4.11 For reasons set out above, we remain of the view that an impact assessment of the proposed convenience goods floorspace is not necessary to support the application.

FOOD AND BEVERAGE IMPACT ASSESSMENT

- 4.12 AY note at Paragraph 2.6 of their Review that it is recommended that GBC request a financial impact assessment of the proposed food and drink offer. The Retail and Leisure Statement undertook a detailed qualitative assessment of the proposed F&B offer, which confirms the following:
- The F&B offer in Gravesend and Dartford Town Centres differs to that proposed at the Site;
 - The centres are dominated by independent operators, with national chains located at Bluewater instead;
 - There is considerable leakage from Gravesham to Bluewater, with 31% of evening restaurant trade from the Northfleet / Gravesend zone being lost to Bluewater.
- 4.13 The R&L Statement concludes that 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 either current trade or planned investment.
- 4.14 In assessing the potential impact of the F&B floorspace, it is important to recognise that the vast majority of the spend is expected to be linked to the other uses at the Site, in particular the stadium, but also the office and residential uses. Although there will inevitably be some trade which is not linked to any other use, this is expected to be the minority. This is an important and relevant consideration for the impact assessment, as it affects the nature and pattern of trade diversion.
- 4.15 Whilst the methodology for assessing the impact of F&B uses is the same as retail, as set out in the Planning Practice Guidance, there is less published data available. For example, whilst the growth in leisure spend is addressed in the Experian Retail Planner Briefing Notes, this is not broken down into different use type (ie restaurants, cafes, take aways, public houses etc) and no data is provided for growth in efficiencies.
- 4.16 Indeed, we note that the 2016 Retail and Commercial Leisure Assessment undertaken by GVA (now part of AY) included a very comprehensive assessment of comparison and convenience goods capacity, including providing estimates of the retail turnovers of the relevant centres. However, the assessment for leisure floorspace as much less detailed with no information on the total leisure and restaurants spend within the relevant centres. This trend continues with the current application at Bluewater, which has not included a quantitative impact assessment, and instead has relied upon a qualitative assessment only. These examples are indicative of the approach to new development including leisure, including F&B, across the country.

- 4.17 Notwithstanding this, to assist the Council in understanding how the quantum of F&B floorspace is likely to function within the wider area, we have undertaken a high level quantitative assessment as detailed below.
- 4.18 As set on in **Figure 4.1**, it is anticipated that the proposed F&B floorspace could have a turnover of approximately **£36.10m**, based on an average sales density of £5,000 per sq. m². The pattern of trade draw is expected to be in line with the proposed retail floorspace, with approximately 75% being drawn from Zones 1-8, i.e. **£27.08m**.

	Gross External Area	Gross Internal Area ³	Net Floorspace ⁴	Sales Density	Turnover	Turnover from Study Area
	(sq. m)	(sq. m)	(sq. m)	(£/sq. m)	£m	£m
Food and Beverage	9,500	9,025	7,220	5,000	36.10	27.08

Figure 4.1 - Turnover of Proposed F&B Floorspace

- 4.19 This represents just **6.15%** of the total available spend for restaurants and cafés within the Catchment Area at 2032, which is expected to be £440.08m, as set out in **Figure 4.2** below.

Year	Total (£m)
2022	£406.93
2027	£410.13
2032	£440.08
Growth 2022 - 2032	£33.14

Figure 4.2 - Total Available Restaurant and Café Spend in Study Area.

Source: Experian Micromarketer Report 2022

- 4.20 Further, available spend for restaurants and cafes is expected to grow by around **£33.14m** between 2022 and 2032, meaning that the additional floorspace can easily be accommodated based on the anticipated growth in expenditure alone, without adversely impacting upon existing floorspace.
- 4.21 This aligns with the findings of the 2016 Retail and Commercial Assessment, undertaken by GVA (now AY), which estimated leisure spend for restaurants and cafes would increase within Gravesham Borough by £47.3m between 2015 and 2027, and by £114.4 within the rest of the Study Area.
- 4.22 It is also relevant to note that the results of both the 2016 Retail and Commercial Leisure Assessment and the Household Survey undertaken to support this Application demonstrate that Bluewater is the dominant location within the CA for both daytime cafes and evening restaurants.
- 4.23 Notwithstanding this, as noted above, the primary role of the proposed F&B will be to meet the needs of those either living or working at the Site, or already visiting for leisure and retail purposes, rather than to act as a destination in its own right. However, some trade could be diverted from existing F&B offer from nearby centres.
- 4.24 As confirmed in our R&L Statement, the restaurant offer within both Dartford and Gravesend is limited, and focussed more on the smaller, independent market, serving a local need, and usually combined with another activity. For example, the

² Based on figures from Enfield Retail and Leisure Study : Updated Needs Assessment (2021), Richmond Retail Study (2014) and Tandridge Retail and Leisure Study (2015), all produced by NLP (now Lichfields). All give a sales density of £5,000, suggesting no growth in efficiency over the period 2014-2021.

³ GIA assumed to be 95% of GEA

⁴ Net area assumed to be 80% of GIA

2016 Retail and Commercial Assessment confirms that Under 1% of residents who visit Gravesend Town Centre identified evening restaurants/drinking as the main reason they visited the centre, and under 2% identified it as a secondary reason for visiting. Whilst this demonstrates Gravesend Town Centre may want to look to ways to improve its offer, is clear that any impact on the existing centre will be negligible.

- 4.25 Whilst both Gravesend and Dartford Town Centres accommodate a wide range of independent restaurants, there is a demonstrable lack of national chain restaurants, particularly within the evening dining sector, with most occupiers choosing to locate at Bluewater, as demonstrated by the results of the Household Survey and the 2016 Retail Study.
- 4.26 Therefore, there will be little impact on either Gravesend or Dartford Town Centres for residents who chose to visit independent restaurants, and who predominantly combine a trip to an evening restaurant with another activity, such as the theatre, pub, or club-uses which do not form part of the Proposed Development.
- 4.27 Further, as confirmed in our R&L Statement, the Proposed Development will not impact on the deliverability of the Heritage Quarter in Gravesend Town Centre for a leisure-led scheme to be anchored by cinema with supporting restaurant uses. The scale and nature of the proposed development at the Heritage Quarter is considerably different to that proposed at Northfleet Harbourside, where most of the trade to the F&B uses will linked with another use. Further, the capacity for additional F&B floorspace within the CA will continue to grow, even taking account of the Proposed Development
- 4.28 The above confirms that there is more than sufficient expenditure growth for cafes and restaurants over the assessment period to support the proposed F&B floorspace, without significantly adversely impacting on existing trade. Further, where trade is not directly linked to the other uses at the Site (being the primary role of the floorspace), the majority of trade diversion is expected to come from Bluewater, given the similar type and format of the proposed F&B uses. Given Bluewater's large catchment area, of which the CA is only a small part, as well as the wide range of other uses it provides, the overall impact on Bluewater, an out-of-centre shopping centre, is expected to be negligible.
- 4.29 Taking the above to account, in addition to the qualitative assessment set in the Retail and Leisure Assessment submitted with the application, we conclude that the proposed Food and Beverage floorspace will not lead to an impact on any centre or on the deliverability of existing and planned investment, which could be considered to be significantly adverse.

TYPE OF COMPARISON GOODS PROPOSED

- 4.30 As set out in the Retail and Leisure Statement submitted in support of the application, it is anticipated that proposed retail will comprise high-quality occupiers, ranging in size from around 100 sq. m to 500 sq. m. It will therefore not include large format department or variety stores. The nature of the intended proposed occupiers focussing on the mid to upper end of the retail market, means that it will not directly compete with the existing offer in Gravesend and Dartford Town Centres, which focusses more towards the discount end of the market. Instead, it will compete more directly with the out-of-centre Bluewater Shopping Centre.
- 4.31 The proposed nature of the retail is reflected in the anticipated sales density used within the retail impact assessment, as agreed with the Council at the pre-application stage. Likewise, the proposed pattern of trade diversion.
- 4.32 Notwithstanding this, the application proposes open Class E(a) retail floorspace, with no restrictions on the use, other than restricting the amount of convenience sales. As considered later in this Report, the Applicant would also accept conditions limiting the size of the units.

POPULATION FORECASTS

- 4.33 The population forecasts used in the Retail and Leisure Statement were based on the projections from the 2016 Retail Study. This was agreed with the Council at the pre-application stage, on the basis that these are the most up-to-date figures for the Catchment Area.
- 4.34 For the purposes of this Addendum Report, we have updated the population estimates provided by Experian, which comprises 2021 mid-year estimates, projected forward using ONS 2018-based subnational population projections, which were released in March 2020.
- 4.35 We note that there was a mistake in the original submission in relation to the Catchment Area zones, which the updated retail impact tables also now rectifies.
- 4.36 The effect of the change to the population forecasts is that the total estimated population across the Catchment Area is expected to increase slightly from 279,022 by 2032 to 282,071.

EXPENDITURE DATA

- 4.37 The latest Experian Retail Planner Briefing Note 20 was published in February 2023, following the submission of the application. The updated retail impact tables contained at **Appendix 1** have been updated to include the latest growth rates and assumptions around non-store based sales.
- 4.38 This has the effect of increasing the available expenditure at the 2022 baseline position, but with lower growth forecast to 2032. For reference, the change to the predicted growth rates provided by Experian are set out in **Figure 4.3** below.

	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032
Briefing Note 19	1.6	1.9	2.1	2.8	2.8	2.8	2.8	2.8	2.8	2.9	2.9	2.9	2.9
Briefing Note 20	-6.8	6.7	-0.4	-1.6	0.3	2.5	2.5	2.5	2.5	2.5	3.0	3.0	3.0

Figure 4.3

RAW HOUSEHOLD SURVEY DATA

- 4.39 A new household Survey was undertaken by NEMS in August 2022 to underpin the impact assessment submitted in support of the Application. The scope of the Survey was agreed with the Council in advance, including the size of the Study Area and the survey questions. The Study Area comprised eight study zones and included a total of 851 interviews.
- 4.40 It is not our standard practice to provide a copy of the full Household Survey results alongside the application submission, as this remains the property of the Applicant. However, in this instance, we have provided a copy alongside this Addendum Report, as requested.

COMMITMENTS

- 4.41 We are not aware of any additional planned commitments which need to be considered as part of the impact assessment. We have also not been provided with details of additional commitments to include by either the GBC or AY.

- 4.42 On this basis, we have not modelled any additional commitments beyond Ebbsfleet Central within the updated retail impact tables.
- 4.43 Notwithstanding this, it is relevant to note the current application at Bluewater Shopping Centre, as referenced in Section 2 of this Report (Dartford Ref. 23/00429/COU). This application seeks to reduce the amount of existing retail floorspace at Bluewater by around 9,500 sq. m, which could lead to a positive impact on the overall retail trade within Dartford and Gravesend Town Centres, which has not been modelled in the assessment.

FORECAST PATTERN OF TRADE DRAW

- 4.44 The forecast pattern of trade draw to the development has been included in Figure 3.1 in Section 3 above and is also provided in the updated retail tables at **Appendix 1**. This is based upon existing shopping patterns within the area, with regard to the nature of the Proposed Development as a whole, including the football stadium.
- 4.45 Please note that as the F&B and retail offer are both closely linked with the wider uses at the site, and with each other, the pattern of trade draw for both uses are considered to be the same for the purposes of the assessment.

HEALTH CHECK ASSESSMENTS

- 4.46 AY have requested that the Health Check Assessments be updated to include additional land use data and information on market shares. It should be noted that providing market share data for each centre is not a requirement of the Planning Practice Guidance (PPG), and this information in relation to comparison sales is contained in Table 5 of the retail impact tables at **Appendix 1**.
- 4.47 We have however updated the Health Check Assessments to include the numbers and proportion of the different GOAD categories. These are included at **Appendix 2** of this Report and demonstrate the diverse range of uses within both Gravesend and Dartford Town Centres.
- 4.48 Taking account of the above, we conclude that the Health Check Assessments submitted in support of the Application fully meet the requirements if the PPG and demonstrate that both Dartford and Gravesend Town Centres perform their role within the wider hierarchy well.

IMPACT ON EXISTING TOWN CENTRE INVESTMENT

- 4.49 Section 4.5 of the AY Note relates to Town Centre investment. AY confirm that they are not aware of any planned or committed investment projects although this should be confirmed by Officers at GBC. AY also state that analysis on existing planned investment has been largely ignored by the Applicant.
- 4.50 Section 6 of the R&L Statement assesses the potential impact of the Proposed Development. The first part of the Section undertakes a quantitative assessment whereby the potential direct impact on the current turnover of the relevant centres is assessed. Paragraphs 6.74 onwards builds upon this to consider the potential impact on existing, committed and planned investment, and concludes that the Proposed Development would not significantly adversely impact on the ability of any identified investment to come forward as currently planned.
- 4.51 It is important to note that both the impact on current turnover and on planned and committed investment are intrinsically linked. For example, if a development is considered to have only a negligible impact on a centre in terms of diversion of spend, it follows that any planned investment for that centre is unlikely to be significantly affected.

- 4.52 The assessment carried out in support of the application considered a number of planned investment opportunities including the expansion of The Hive Local Centre, the development of the Heritage Quarter in Gravesend, the Northern Gateway Site in Dartford, and the Ebbsfleet Vallet Strategic Site, including Ebbsfleet Central and Eastern Quarry. It was concluded that the Proposed Development would not lead to a significant adverse impact in the ability of any of these sites to come forward as currently planned.
- 4.53 Table 6.2 clearly shows that the Proposed Development will not lead to a notable impact on the existing turnover of either Dartford or Gravesend Town Centres. **Figure 4.4** below provides an updated version of this table taking account of the changes to the retail impact assessment set out above.

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	3.89%	3.60%	£0.45	£9.53
Dartford Town Centre	2.91%	2.72%	£1.75	£12.29
Bluewater	4.93%	4.53%	-£5.88	£108.22

Figure 4.4

- 4.54 The potential impact at 2027 and 2032 on the retail turnover of Gravesend Town Centre has increased slightly from our original assessment due to the updated growth rates from Experian and changes to the population forecast, from 3.44% and 3.10% to 3.89% at 2027 and 3.60% at 2032. This represents only a small increase, with the total cumulative impact remaining at level below what could be considered to be significantly adverse.
- 4.55 By contrast, the potential impact on Dartford Town Centre has fallen slightly from 3.28% at 2027 and 2.99% at 2032, to 2.91% and 2.72% respectively. **Table 4.1** also demonstrates that the turnover of both Dartford and Gravesend Town Centres will continue to grow over the assessment period, with the predicted turnover at both 2027 and 2032 being above the 2022 level, thereby protecting the existing investment.
- 4.56 Taking account of the above, we consider that the impact on current and planned investment has been adequately addressed within the R&L Statement and the updated retail impact tables attached at **Appendix 1**.

CUMULATIVE IMPACT WITH EBBSFLEET CENTRAL

- 4.57 Our Retail and Leisure Assessment provided a clear assessment of the cumulative impact of the Proposed Development with Ebbsfleet Central. This is set out in **Table 7** of the original and updated retail impact tables, contained at Appendix 1.
- 4.58 We note that the Ebbsfleet Development Corporation (EDC) have objected to the application, as follows:

“The submitted Retail and Leisure Assessment concludes that the proposed development would not have a ‘significant adverse impact’ on the vitality or viability of any existing or planned retail centre. Whilst ultimately a matter for the Borough Council to consider in assessing this planning application, EDC is unconvinced by this conclusion and consider that the quantum of retail and leisure floorspace proposed would compete with the

existing and planned centres at Gravesend, Northfleet, Swanscombe and Ebbsfleet Central East and therefore have concerns that this would result in an adverse impact and divert potential investment away from these areas”.

- 4.59 However, it is relevant to note that EDC do not provide any of their own analysis or provide any further detail about how the Proposed Development could significantly adversely impact the ability for Ebbsfleet Central, to be developed.
- 4.60 As recognised in our R&L Statement, the ambition for Ebbsfleet Central is to create a new centre with catchment 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. 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. This proposes a similar level of net comparison goods floorspace as the Proposed Development, but a considerably higher amount of convenience goods floorspace.
- 4.61 It is important to note that the plans for Ebbsfleet Central comprise much more than simply a retail and leisure development. The development is intrinsically linked with Ebbsfleet International Station and proposes up to 485,000 sq. m of floorspace across the site, including residential, residential institutions, co-living space and other commercial uses, including up to 100,000 sq. m of office and business space.
- 4.62 The proposed retail at Ebbsfleet Central is designed to meet the needs of those living, working, and using the facilities within Ebbsfleet, rather than seeking to directly compete with other existing retail locations in the area.
- 4.63 This need for supporting retail floorspace at Ebbsfleet Central, including a considerable amount of convenience floorspace, will not be significantly adversely affected by the Proposed Development, which seeks to serve a different catchment and meet a different need. The retail floorspace at Ebbsfleet Central will include District Centre to provide larger units (up to 2,500 sq. m in size), in addition to smaller units within a local centre, which units up to 750 sq. m.
- 4.64 This is distinctly different to Northfleet Harbourside, where the units will typically range from 100 sq. m to 500 sq. m in size. Further, very little convenience floorspace is proposed, with supporting small scale convenience provision only, rather than a main foodstore, unlike Ebbsfleet Central, where up to 4,031 sq. m of convenience floorspace is proposed.
- 4.65 It is therefore clear Northfleet Harbourside and Ebbsfleet Central will not be competing for the same type and scale of retailers.
- 4.66 In any event, as confirmed by the updates retail impact tables at Appendix 1, there is sufficient expenditure to support both proposals, without leading to a significant adverse impact on any identified centre.
- 4.67 Therefore, we remain of the view that there is no reason to suggest that the Proposed Development would lead to Ebbsfleet Central becoming undeliverable for the following reasons:
- the role of the proposed retail floorspace at Ebbsfleet Central being to form a District and Local Centre to support the wider Ebbsfleet development;
 - the different type and scale of retail is markedly different to that proposed at Northfleet Harbourside; and
 - the addendum retail impact tables at Appendix 1 confirm that there is sufficient capacity to support both proposals.

CONCLUSIONS ON IMPACT

- 4.68 In this section, we have provided an update to the impact assessment submitted within the R&L Statement to take account of the comments by AY. Notwithstanding this, the conclusions remain the same in the Proposed Development will not lead

to a significant adverse impact on either the vitality and viability of any allocated centre, or on the ability for existing, committed, and proposed investment to be realised.

5.0 PLANNING CONDITIONS

5.1 Section 5.7 of the AY Review queries whether it would be possible to agree planning conditions at this stage which seek to control the use of the proposed retail and F&B floorspace, including:

- i) The size of the retail and food/beverage unit;
- ii) Controlling the range of goods to be sold from the units;
- iii) Applying maximum net / gross floorspace quantum; and
- iv) Controlling any flexibility within Use Class E

5.2 We confirm that the Applicant would be willing to discuss the potential to include planning conditions relating to the use of the floorspace, including:

- i) No single convenience goods unit within Class E(a) may exceed 280 sq. m (GIA) in size, unless first agreed in writing by the Local Planning Authority
- ii) No single comparison goods unit within Class E(a) may exceed 500 sq. m (GIA) in size, unless first agreed in writing by the Local Planning Authority
- iii) No single food and beverage unit within Class E(d) may exceed 500 sq. m (GIA) in size, unless first agreed in writing by the Local Planning Authority
- iv) No additional floorspace can be created within the units at mezzanine level, unless first agreed in writing by the Local Planning Authority
- v) No retail or food and beverage unit can come into use until work has commenced on the construction of the new stadium.

5.3 We are happy to discuss these further with Officers as the application progresses.

6.0 SUMMARY AND CONCLUSIONS

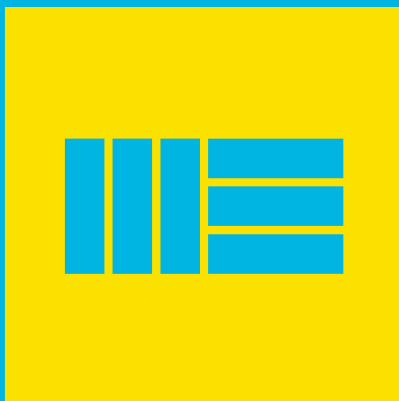
- 6.1 This Addendum Retail and Leisure Statement has been prepared in support of an application for outline planning permission for the redevelopment and regeneration of the site known as Northfleet Harbourside to create a vibrant mixed-use development delivering new sporting facilities for Ebbsfleet United FC, new homes, retail, community, and office uses, as well as extensive areas of public realm and improved pedestrian and cycle connections (LPA Ref.20221064).
- 6.2 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 format 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.
- 6.3 The proposed retail and F&B offering intrinsically linked to the viability of the proposed improvements to the stadium and the development as a whole, with the level of funding and investment required for the proposed improvements only achievable through the introduction of these supporting uses. The critical mass of visitors that will be drawn to the Site will help to support the non-football functions of the stadium, providing alternative sources of income for the football club.
- 6.4 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 and, most importantly, visitors to/supporters of the football team. 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.
- 6.5 This Statement has addressed the comments made by Avison Young in relation to retail and leisure matters in their appraisal of the planning application submission, as well as matters raised by the Council's Planning policy team. In doing, this Statement confirms the following:
- The application site remains the most sequentially preferable location for the Proposed Development, even when assessing proposed retail and F&B floorspace only;
 - The proposed retail and F&B floorspace element is crucial for the viability of the proposed stadium and the development as a whole and does not act as a destination in its own right;
 - There remains no need to undertake a detailed quantitative convenience goods assessment;
 - A high-level quantitative F&B assessment has been undertaken which confirms that there is sufficient growth in expenditure to support the development without impacting on existing floorspace.
 - Combined with the previously submitted qualitative assessment, this Statement confirms that the F&B element of the Proposed Development will not lead to a significant adverse impact on the vitality or viability of any identified centre.
- 6.6 Taking account of the above, we conclude that the application fully accords with both national and local retail and leisure policy and should therefore be considered favourably by the Council.

APPENDIX 1.0

RETAIL IMPACT TABLES

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WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.