



OTTERPOOL PARK

COUNTRYSIDE • CONNECTED • CREATIVE

DOCUMENTS SUBMITTED IN SUPPORT

OP5 APPENDIX 11.2 – **RETAIL IMPACT ASSESSMENT**

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March 2022



OTTERPOOL PARK

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APPLICATION CONTENTS

Application Administration

OP1	Covering Letter
OP2	Planning Fee
OP3	Outline Planning Application Form, including relevant certificates & CIL Form.

Environmental Statement

OP4	Non-technical Summary
OP5	Environmental Statement which assesses the impact of the proposed development on the following topics:

Chapter 1	Introduction
Chapter 2	EIA Approach and Methodology
Chapter 3	Development and Consideration of Alternatives
Chapter 4	The Site and Proposed Development
Chapter 5	Agriculture and Soils
Chapter 6	Air Quality
Chapter 7	Ecology and Biodiversity
Chapter 8	Climate Change
Chapter 9	Cultural Heritage
Chapter 10	Geology, Hydrology and Land Quality
Chapter 11	Human Health
Chapter 12	Landscape and Visual Impact
Chapter 13	Noise and Vibration
Chapter 14	Socioeconomic effects and community
Chapter 15	Surface water resources and flood risk
Chapter 16	Transport
Chapter 17	Waste and resource management

Please refer to ES Contents page which provides a full list of ES Appendices

Documents submitted for approval

OP5 Appendix 4.1	Development Specification
OP5 Appendix 4.2	Site Boundary and Parameter Plans
OP5 Appendix 2.8	Alternative Parameter Plans (with permitted waste facility in situ)
OP5 Appendix 4.3	Strategic Design Principles

Documents submitted in support

OP5 Appendix 2.6	Commitments Register
OP5 Appendix 2.7	Infrastructure Assessment (regarding the permitted waste facility)
OP5 Appendix 4.4	Illustrative accommodation schedule
OP5 Appendix 4.5	Illustrative plans

OP5 Appendix 4.6	Indicative phasing plan
OP5 Appendix 4.8	Utilities Strategy
OP5 Appendix 4.9	Energy Strategy
OP5 Appendix 4.10	Community Development and Facilities Strategy
OP5 Appendix 4.11	Green Infrastructure Strategy
OP5 Appendix 4.12	Heritage Strategy
OP5 Appendix 4.13	Governance and Stewardship Strategy
OP5 Appendix 4.14	Housing Strategy (including affordable housing strategy)
OP5 Appendix 4.15	Overarching Delivery Management Strategy
OP5 Appendix 4.16	Design and Access Statement
OP5 Appendix 9.25	Conservation Management Plan
OP5 Appendix 9.26	Schedule Monument Consent Decision
OP5 Appendix 11.1	Health Impact Assessment
OP5 Appendix 11.2	Retail Impact Assessment
OP5 Appendix 12.5	Kentish Vernacular Study and Colour Studies
OP5 Appendix 14.1	Economic Strategy
OP5 Appendix 15.1	Flood Risk Assessment and Surface Water Drainage Strategy
OP5 Appendix 15.2	Water Cycle Study
OP5 Appendix 16.4	Transport Assessment
OP5 Appendix 16.5	Transport Strategy
OP5 Appendix 16.6	Framework Travel Plan
OP5 Appendix 17.2	Minerals Assessment
OP5 Appendix 17.3	Outline site waste management plan

OP6	Guide to the Planning Application
OP7	Spatial Vision
OP8	Planning and Delivery Statement
OP9	Sustainability Statement
OP10	Monitoring and Evaluation Framework document
OP11	Mobility Vision Report
OP12	User-centric travel document
OP13	Access and Movement Mode Share Targets
OP14	Cultural and Creative Strategy
OP15	Statement of Community Involvement
OP16	Supplemental Statement of Community Involvement



Quod

Retail Impact Assessment

Otterpool Park

MARCH 2022

Q80641

Contents

1	Introduction	1
2	Policy Context	3
3	Sequential Approach	7
4	Trading Effects of the Proposed Development	10
5	Conclusions	25

Documents

1	Site Location Plan
2	Retail Impact Analysis
3	Food and Beverage Impact Analysis
4	Overall Retail / Food and Beverage Impact
5	Retail Impact Methodology Note

1 Introduction

Scope and Purpose

1.1 This Retail Impact Assessment (RIA) has been prepared by Quod on behalf of Otterpool Park LLP ('the Applicant') in support of the outline planning application for a garden settlement on land bounded by the M20 and Channel Tunnel Railway Line (CTRL) to the north; the A20 / Stone Street and Sandling Park to the east; Harringe Lane to the west, and: Aldington Road to the south ('the Application Site').

1.2 Specifically, the application seeks approval for the following development:

Outline planning application seeking permission for the redevelopment of the site through the demolition or conversion of identified existing buildings and erection of a residential led mixed use development comprising up to 8,500 residential homes including market and affordable homes; age restricted homes, assisted living homes, extra care facilities, care homes, sheltered housing and care villages; a range of community uses including primary and secondary schools, health centres and nursery facilities; retail and related uses; leisure facilities; business and commercial uses; open space and public realm; burial ground, sustainable urban drainage systems; utility and energy facilities and infrastructure; waste and waste water infrastructure and management facilities; vehicular bridge links; undercroft, surface and multi-storey car parking; creation of new vehicular and pedestrian accesses into the site, and creation of a new vehicular, pedestrian and cycle network within the site; improvements to the existing highway and local road network; lighting; engineering works, infrastructure and associated facilities; together with interim works or temporary structures required by the development and other associated works including temporary meanwhile uses. Layout, scale, appearance, landscaping and means of access are reserved for approval.

1.3 This RIA has been prepared to assess retail policy in respect of the proposals and demonstrate how the development meets national and local planning policies. This RIA takes into account the comments provided by Lichfields (dated 28th May 2019) on behalf of Folkestone and Hythe District Council (F&HDC) to the original impact assessment prepared in support of the application proposals.

Location and Context of Application Site

1.4 The Application Site extends to approximately 589 hectares and is predominantly greenfield in nature, occupied by agricultural uses and associated farm holdings as well as some residential, light commercial and leisure uses.

1.5 A Site Location Plan is contained at **Document 1**.

1.6 The Applicant proposes to deliver a new garden settlement and is committed to ensuring the creation of a high-quality sustainable community based on the principles of garden town development.

- 1.7 As part of the new settlement, high quality new homes and supporting uses, including a new town centre (as supported by adopted local planning policy) to meet the needs of the new residential community are proposed. Full details of the application proposal are provided in the accompanying Design and Access Statement and Planning and Delivery Statement.
- 1.8 In short, the proposed development is a residential-led new garden town providing a new settlement to deliver approximately 8,500 homes, new commercial floorspace and associated infrastructure.
- 1.9 As part of the proposals a new vibrant town centre is proposed. This town centre will be located within the north eastern element of the Application Site, benefiting from its accessibility to existing transport routes via Westernhanger Station and Junction 11 of the M20 Motorway.
- 1.10 The following retail uses are envisaged:
- Up to 15,000 square metres (gross) of Class E (retail) floorspace; and
 - Up to 4,200 square metres of food and beverage (F&B) (Sui Generis Class) floorspace.
- 1.11 The mix of uses proposed reflects the expected need, and it is critical in creating a sense of place and identity. The nature and scale of uses are intended to be of a proportionate scale to the population of the overall proposals and will be delivered on a phased basis. Although it will be important to provide the critical mass of main town centre uses at the earlier stages of development to provide a viable retail location and a sense of place.
- 1.12 This RIA has identified and assessed the likely impact of the main town centre uses¹ proposed. However, when considering this it is important to note that such uses will principally be provided within a newly created town centre (as supported by adopted local planning policy, which is well advanced) that will be highly accessible and will serve the needs of the new community created as part of the wider development.

Structure of Report

- 1.13 The report addresses the retail planning issues arising from the proposal, setting out background to, and detailed justification for the application. The RIA is structured as follows:
- **Section 2** – sets out the relevant retail and town centre policy context against which the proposals need to be assessed;
 - **Section 3** – provides the sequential approach to site selection;
 - **Section 4** – assesses the proposals against the impact test; and
 - **Section 5** – draws the report's conclusions.

¹ Defined at Annex 2 of the NPPF (2021) as: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

2 Policy Context

2.1 A full policy overview is provided within the supporting Planning Statement. For the purposes of this report, the retail and town centre policies relevant to the proposals is outlined below.

Development Plan

2.2 The development plan for the Application Site comprises the Folkestone and Hythe Core Strategy Review (2022) and the Folkestone & Hythe District Places and Policies Local Plan (2020) together with the Kent Minerals and Waste Local Plan (2020).

2.3 With respect to retailing and town centres, Policy SS4 of the Core Strategy Review outlines that major commercial development (including retail) should be located in accordance with the Priority Centres of Activity network and should reinforce the role of the centre.

2.4 The Priority Centres of Activity Network is defined as follows:

- **Town Centres:** Folkestone; Hythe; and New Romney
- **District Centres:** Cheriton; Lydd; Hawkinge
- **Local Centres:** Sandgate Village; Dymchurch; Lyminge; Elham; and Sellindge.

2.5 Policy SS4 also states that:

“A 'town centre first' policy will operate for applicable uses in line with national policy. Potential town centre activities or those creating significant transport demand, including retail, leisure and major office uses, should be located sequentially, looking firstly at locations within town centres, then on the edge of centres, and only then out of centre; and with regard to their impact on the vitality and viability of the defined town, district and local centres.”

2.6 The Priority Centre of Activity Network outlined within the Core Strategy is consistent with the retail hierarchy (Policy RL1) of the Places and Policies Local Plan.

2.7 Local planning policies seek to focus retail and other main town centre uses within existing centres.

2.8 With regard to retail and town centre uses elsewhere, Policy RL8 of the Places and Policies Local Plan states that planning permission for such uses will be permitted provided that certain criteria is met. This includes, *inter alia*:

- The sequential approach to site selection.
- An assessment of the impact the proposal would have on existing centres; and
- Demonstrating that the site is in an accessible location and well connected to the centre enabling easy access by non-car modes.

- 2.9 The Policy also sets an impact threshold for when an impact assessment is required of 500 square metres (gross) outside the town and district centres, and 200 square metres (gross) outside local centres. The policy confirms that the threshold to be applied will be based on the nearest centre to the proposal.
- 2.10 The Core Strategy Review identifies Otterpool Park as a new garden settlement to meet the district's housing needs on a strategic scale (draft Policy SS6). Policy SS7 goes on to state that as part of the new garden settlement a vibrant town centre will be provided to act as a focal point.
- 2.11 Specifically, Policy SS7(b) outlines that:

“Food shopping (convenience retail) shall be provided within the town centre to allow choice and variety as well as reducing the need to travel for day-to-day needs. The Retail and Leisure Need Assessment (June 2019 update) indicates that the new garden settlement can support up to 4,284sqm (gross) of convenience retail floorspace within the plan period to 2037. A range of other shopping floorspace (comparison retail) shall also be provided to create a vibrant town centre. The Retail and Leisure Need Assessment (June 2019 update) indicates that the new garden settlement can support up to 9,108sqm (gross) of comparison retail floorspace within the plan period. A mix of other town centre uses should be provided, including food and beverage space (up to 3,305sqm gross) and non-retail and financial and professional services (approximately 3,300sqm gross). The stated floorspace projections by use class type (baseline values) as drawn from the Retail and Leisure Need Assessment (June 2019 update) are to represent the upper limit of floorspace provision within the garden settlement across the plan period, so that it only meets the needs generated by the development itself. Should any phase of development propose a provision of floorspace that, when considered cumulatively to take account of the total floorspace provision across the garden settlement, would lead to the exceedance of one or more of the floorspace values stated within this policy, or if any individual comparison retail unit were to exceed 500sqm gross floorspace, then the promoter shall have to submit an impact assessment to demonstrate that there would be no detrimental significant impacts on the vitality and viability (including local consumer choice and trade) of nearby local village centres and other town centres including Folkestone, Hythe, New Romney, Dover and Ashford, by the scale and/or phasing of town centre development.”

- 2.12 In terms of main town centre uses within the garden settlement, the adopted Core Strategy (para. 4.179) goes on to identify that:

“At the heart of the development will be a vibrant town centre that will meet the needs of residents, workers and visitors with attractive cultural, community shopping and leisure facilities, as well as spaces for events and meetings to foster community cohesion.”

- 2.13 Paragraph 4.179 also states that:

“It is expected that the retail provision will be provided as part of the new town centre, which should be located at the heart of the garden settlement, within easy walking distance of the station. Other small-scale retail development would be expected to be provided at ‘local centres’ in neighbourhoods through the separate phases of the development. It is expected that the individual units provided for comparison retail will not exceed in the region of 500sqm, unless justified by a retail impact assessment, and that the majority of retail development will

be provided as small local stores. Details of how the retail development is proposed to be phased across the development, to align with residential development, should be submitted with the application.”

- 2.14 Within this context, adopted local planning policy allocates Otterpool Park as a new settlement, which includes the provision of retail and other uses within a town centre to meet the needs of the new residential community.

Material Considerations

National Planning Policy Framework (2021)

- 2.15 The NPPF is underpinned by a presumption in favour of sustainable development which is embodied within Paragraph 11.

- 2.16 Paragraph 8 sets out the economic objective to *‘help build a strong, responsive and competitive economy’*. Paragraph 81 goes on to advise that *‘planning policies and decisions should help to 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...’*

- 2.17 Moreover, Paragraph 38 sets out that local planning authorities should:

“...work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.”

- 2.18 In terms of town centre and retail policies, these are set out at paragraphs 86 to 91 inclusive. Paragraph 86 advises that needs for all main town centres are met in full and not compromised by limited site availability. It goes on to note (para. 87) that local planning authorities should apply the sequential test to planning applications for main town centre uses that are not in an existing centre and not in accordance with an up-to-date Local Plan. In undertaking such an assessment, Paragraph 88 states that applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.

- 2.19 In terms of retail impact, Paragraph 90 advises that for retail development outside of town centres (which is not in accordance with an up-to-date plan) local planning authorities should:

“...require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500sqm). This should include an assessment of:

- *the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
- *the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider retail catchment (as applicable to the scale and nature of the scheme).”*

Other Material Considerations

- 2.20 Lichfields produced the Folkestone & Hythe Retail and Leisure Need Assessment (RLNA) (June 2019 update) on behalf of F&HDC.
- 2.21 This updated the earlier 2015 Study and included analysis and recommendations on the implications of the updated need assessment and commentary on how this can be met, including the role that the new Garden Settlement at Otterpool Park can play in meeting this need.

Summary

- 2.22 The starting point for determining the planning application is the development plan. Consideration must also be given to national planning policy, which is an important material consideration in the determination of the proposal.
- 2.23 It is recognised that planning policy at both the national and local level requires proposals for retail and other main town centre uses outside existing centres and not allocated in an up-to-date development to apply the sequential approach to site selection and (for certain scale of development) address retail impact.
- 2.24 Recently adopted local planning policy identifies Otterpool Park as a strategic allocation to meet housing needs, and that the new garden settlement will include a new town centre and local centres delivering more than 17,200 square metres (gross) of retail and F&B floorspace to meet the needs of the new community.

3 Sequential Approach

- 3.1 National and local planning policy requires that the sequential approach to site selection be applied for main town centre uses that are not in an existing centre and not in accordance with an up-to-date plan. Whilst the sequential approach seeks to focus new retail development in defined centres, it does not preclude sites coming forward elsewhere if no in-centre or edge-of-centre opportunities exist.
- 3.2 It is acknowledged that the Application Site does not comprise an existing centre, however when considering the sequential approach to site selection it is important to note that the retail and main town centre uses proposed will largely serve the needs of the new settlement.
- 3.3 Indeed, in applying the sequential approach it is important to note the following:
- The adopted Core Strategy Review identifies that a vibrant town centre will be delivered as part of the new garden settlement at Otterpool Park to meet the needs of residents, workers and visitors with attractive cultural, community shopping and leisure facilities, as well as spaces for events and meetings to foster community cohesion.
 - The provision of the proposed ‘town centre uses’ on the Application Site is essential to the creation of place. The overarching vision to create a new garden town that meets the pressing housing needs in the district and wider sub-region, and one that also meets the needs of the local population in a sustainable location; and
 - In addition to place making, the town centre uses will principally meet the needs of the new community created within the new settlement. The scheme includes the delivery of c. 8,500 residential units, which, once completed, will itself generate a new resident population of approximately 17,850 people. This substantial on-site population will generate in the region of £147 million of retail expenditure per annum by 2042 – the anticipated completion date of the 8,500 homes and supporting uses proposed by the planning application. The scale and type of town centre uses proposed will support the day-to-day needs of the Site’s living and working population, which in turn will lead to sustainability benefits, reducing the needs of the population to travel off-site. This position is equally true when considering other main town centre uses, such as leisure and food and beverage (F&B) outlets.

In comparing the potential turnover of the proposed retail floorspace (up to £63.53 million by 2042²) fits comfortably with the ‘on site’ expenditure generated by the resident population (up to £147 million by 2042³). Whilst it is acknowledged that the proposed development will not retain 100% of the on-site expenditure generated, based on realistic retention levels derived from the RLNA the potential retained expenditure (£84.65 million)⁴ means that the turnover of the proposal (up to £63.53 million) represents approximately 75% of this expenditure. The demonstrates that the scale of retail uses proposed are appropriate in scale to the need that it is intended to serve. Likewise, for F&B uses, the level of expenditure generated on site (based on realistic assumptions in

² As derived from Table 2d at Document 2

³ As derived from Table 1 at Document 2

⁴ As derived from Table 2e at Document 2

terms of retention levels⁵) means that the turnover of the proposal (up to £18.20 million by 2042) fits comfortably within the available on-site expenditure that could realistically be retained (£25.88 million)⁶.

Likewise, the Core Strategy Review (Policy SS7) identifies that the Council's retail evidence (the RLNA) indicates that the new garden settlement can support up to 4,284 square metres (gross) of convenience retail floorspace and up to 9,108 square metres (gross) of comparison retail floorspace within the plan period to 2037, together with a mix of other town centre uses (c. 6,605 square metres), including up to 3,305 square metres of F&B floorspace, which should be provided. Whilst the proposals marginally exceed this floorspace requirements in terms of F&B and convenience floorspace, it is significant to note that the indicative figures provided within the adopted Local Plan cover the period to 2037 whereas it is not until 2042 that the 8,500 houses and supporting infrastructure subject to this planning application is expected to be delivered.

- 3.4 In this context, the principle of additional retail and F&B floorspace as part of the new settlement is supported by adopted local planning policy. Furthermore, the quantum of floorspace is largely within the floorspace parameters identified by adopted planning policy (informed by the findings of the RLNA) as being capable of being supported by the new community as part of the required town centre.
- 3.5 Against this background, it is not possible to disaggregate the main town centre uses from the wider development proposals.
- 3.6 The purpose of the main town centre uses is to provide local retail facilities to serve the proposed community at Otterpool Park. The main requirements of the retail and other town centres proposed are location specific. To propose the requisite level of floorspace elsewhere in existing centres outside the application site would be to promote unsustainable patterns of development by leading to the need of future residents of the proposed garden town having to travel to other facilities outside of the natural hinterland of the Otterpool Park development. Consistent with the overarching objective of the development, the retail and main town centre uses proposed have been located on areas that are highly accessible to residents. This is acknowledged in the adopted local planning policy, which recognises the importance of a vibrant town centre of the broad scale proposed to meet the needs of the new residential community.
- 3.7 In considering this matter, when addressing the sequential tests, the Planning Practice Guidance (PPG) that accompanies national policy advises⁷ that the application of the sequential test should:

“...be proportionate and appropriate for the given proposal.”

- 3.8 Furthermore, the PPG goes on to state⁸ that:

⁵ Derived from the RLNA

⁶ As derived from Table 2e at Document 3

⁷ Reference ID: 2b-011-20190722

⁸ Reference ID: 2b-012-20190722

“Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which means that they may only be accommodated in specific locations.”

- 3.9 Both these factors are pertinent in considering the form and nature of development proposed by this application.
- 3.10 Against this background, given the site-specific requirements, it is not deemed necessary to apply the sequential approach to site selection given the specific type of development proposed, and the policy context.
- 3.11 Nevertheless, we are not aware of any sequentially preferable location that could accommodate the broad scale of development being proposed. There can be no other suitable site(s) on which the proposed town centre uses could be located, and the sequential test should be considered to be passed, even if it applied.

4 Trading Effects of the Proposed Development

Context

- 4.1 An assessment of impact is required for proposals for retail and leisure development outside town centres and not in accordance with an up-to-date plan above the default threshold of 2,500 square metres or any locally set threshold. Whilst there is a locally set threshold of 200 square metres (Policy RL8), it is acknowledged that the proposals exceed both the national and locally set threshold when an impact assessment is required. However, it is significant to note that adopted local planning policy is supportive of substantial retail and F&B floorspace as part of the wider new garden settlement at Otterpool Park. Adopted policy states that retail impact is only a consideration for proposals that exceed the floorspace requirements and where individual comparison retail unit exceeds 500 square metres (gross). As previously indicated, the quantum of floorspace proposed is broadly in line with planning policy, and therefore it can be argued retail impact will only need to be assessed for any floorspace that exceeds the floorspace figures outlined in adopted policy. This is identified to be just c. 500 square metres. It is therefore in this context that the trading effects of the proposal needs to be considered.
- 4.2 Despite this, for completeness we have assessed the likely trading effects of the full quantum of retail and F&B floorspace proposed. This represents a very robust approach given the adopted local planning policy.
- 4.3 The NPPF (para. 90) sets out the impact considerations against which planning applications for retail and leisure uses should be assessed. Applicants are required to address a two-pronged impact assessment of:
- The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
 - The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).
- 4.4 In undertaking this assessment, it is important to note that in considering the potential impact associated with new development, the NPPF (para. 91) states that an application should only be refused where the proposed development is likely to have a 'significant adverse' impact (our emphasis). Consequently, the threshold of what is considered unacceptable is set high when considering impact.
- 4.5 For an impact to be deemed significant adverse there needs to be demonstrable evidence. This is illustrated by for example an appeal decision at Derby⁹. This decision highlighted that a demonstration of impact does not necessarily mean that the proposal is unacceptable.

⁹ APP/C1055/A/11/2161815

Instead, the Inspector at Derby recognised that there needs to be evidence that any impact is likely to be significant. Paragraph 116 of the Inspector’s Report stated that:

“To justify an objection to the proposal it is not sufficient to simply suggest that there will be an impact. There is no persuasive evidence of such a significant impact that would be likely to undermine the vitality and viability of the city centre trade/turnover and trade in the wider area, arising from the appeal proposal.” (our emphasis)

4.6 The fact that there must be some evidence to demonstrate that any impact is likely to be significant is an important factor to consider when understanding the specific application proposal, which will largely meet ‘on site’ needs.

4.7 When assessing retail impact, established practice and recent appeal / Secretary of State decisions have confirmed that the requirement is to consider the impact on the centre as a whole rather than an impact on specific retailers or sub-sectors.

4.8 For example, in the Secretary of State decision at Scotch Corner, North Yorkshire¹⁰, the Inspector concluded that:

“Superficially, DBC’s [Darlington Borough Council] “sub-sectoral” approach appears attractive. However, I agree with the applicant and RDC that such an approach conflicts with national policy where the impact test requires any adverse impact to be assessed in light of the vitality and viability of a town centre as a whole.” (our emphasis)

4.9 The Inspector’s position was supported by the Secretary of State in stating (Paragraph 12 of his report) that:

“For the reasons given at IR11.11–11.15, he agrees with the Inspector’s conclusions on the numerical assessments of the impact on town centre turnover put forward by various parties, and further agrees with the Inspector’s conclusions in giving little weight to the ‘sub-sectoral’ approach put forward by Darlington Borough Council.”

4.10 This approach has been further supported by the Secretary of State decision at Tollgate West, Essex¹¹ where in considering impact, the Inspector (Paragraph 12.4.5, Inspector’s Report) stated that:

“The assessment of impact must be made against the town centre as a whole.” (our emphasis)

4.11 Given that it has been established that the relevant test is to consider the impact on the vitality and viability of a centre as a whole rather than specific sectors or retailers. Such an approach has been reflected in our assessment.

4.12 The Secretary of State decision at Tollgate West, Essex also recognised that there are two broad principle considerations when assessing impact¹².

¹⁰ APP/V2723/V/15/313873

¹¹ APP/A1530/W/16/3147039

¹² Paras. 12.4.6 to 12.4.7, Inspector’s Report

- 4.13 The first approach, as established by the Rushden Lakes Secretary of State decision¹³, is to assess significance of impact by comparing town centre turnover in the base year of the assessment against predicted turnover with the proposed development in place.
- 4.14 The second approach – established by the Scotch Corner Secretary of State decision (referred to above) – is that it is necessary to provide a judgment of the current health of town centres and to understand whether the level of impact resulting from the proposal will be significant.
- 4.15 Both approaches have been considered in understanding whether the proposal is likely to lead to a significant adverse impact on the vitality and viability of existing centres.
- 4.16 It is against this background that the likely effects of each main town centre use proposed are tested against planning policy at the national and local level.

Impact on Investment

- 4.17 The PPG provides a helpful insight about measuring the effect of development outside a defined centre on in centre investment. Specifically, the PPG¹⁴ states that:

“Where wider town centre development or investments are in progress, it will also be appropriate to assess the impact of relevant applications on that investment. Key considerations will include:

- *The policy status of the investment (i.e. whether it is outlined in the Development Plan)*
- *The progress made towards securing the investment (for example if contracts are established)*
- *The extent to which an application is likely to undermine planned developments or investments based on the effects on current / forecast turnovers, operator demand and investor confidence.”*

- 4.18 The Secretary of State decision at Rushden Lakes also provided commentary on the ‘planned investment’ test. Paragraph 8.60 of the Inspector’s Report concludes that:

“NPPF [26] requires an assessment of the impact (if any) of the proposal on “existing, committed and planned public and private investment” in a centre. That requirement is quite straightforward, only investment that has been made, and been committed or is planned warrants consideration. There appears to be general agreement that “existing” investment is to be taken as a reference to investment that has already been made and that “committed” investment is that which is contractually committed (private) or subject to resolution (public).”
(our emphasis)

- 4.19 Whilst there was disagreement at the Inquiry as to what constituted ‘planned investment’ the Inspector pointed the parties to the advice contained within the December 2009 Practice Guidance. This has now been superseded by the current PPG, but the guidance talks about instances where the local planning authority and/or the private sector has identified town centre

¹³ APP/G2815/V/12/2190175

¹⁴ Reference ID: 2b-015-20190722

development opportunities and is 'actively progressing them'. In determining the impact, a list of key considerations is then set out, which is very similar to the PPG commentary, as set out above. It is in this context that potential impact on future investment must be considered.

- 4.20 We are not aware of any current or committed investment proposals in the existing centres in the Borough that the proposals may have an unacceptable impact upon. The delivery of a new town centre comprising the broad quanta of floorspace being proposed by this application is supported by adopted local planning policy and reflects F&HDC's strategic approach to growth.
- 4.21 Furthermore, the NPPF (para. 90) only requires the impact on planned investment in a centre or centres in the catchment area of the proposal. As has been demonstrated, the proposed development will principally serve the needs of the new residential community. Indeed, the anticipated turnover of the retail floorspace is less than the available retail expenditure likely to be generated by the completed development that is available to support new retail and other main town centre uses.
- 4.22 As such, there is no evidence to suggest that the proposals will lead to a significant adverse impact on planned investment in the catchment area of the proposal. The catchment area is the new settlement, where adopted planning policy requires the delivery of a new town centre for the broad quantum of floorspace being proposed.

Trading Effects of the Proposed Retail Floorspace

- 4.23 In terms of the retail (Class E) floorspace being proposed, the approach undertaken has been to assess the trading effects following established practice (as reflected in the PPG). Detailed analysis is contained at **Document 2**.

Proposed Turnover

- 4.24 Prior to determining the potential impact of the proposed development, it is important to quantify the level of expected turnover that it is anticipated to be generated by this element of the overall proposal.
- 4.25 The precise tenant mix of the development has not yet been ascertained. To ensure flexibility and demonstrate a robust approach in assessing the proposed land uses, the following scenario has been tested:
- Up to 15,000 square metres of Class E floorspace, inclusive of a foodstore of up to 500 square metres.
 - Of the residual floorspace¹⁵ (14,500 square metres), this is identified to be split 40% (or 5,800 square metres) for convenience goods and 60% (or 8,700 square metres) for comparison goods.
- 4.26 This scenario represents the maximum quantum of floorspace for the Class E uses.
- 4.27 By way of comparison the adopted local planning policy identifies that the new garden settlement could deliver up to 4,284 square metres (gross) of convenience floorspace and up

¹⁵ Excluding foodstore of 500 square metres (gross)

to 9,108 square metres (gross) of comparison goods by 2037. As previously highlighted, the timeframe for the delivery of the proposed development is identified to be by 2042, with the retail floorspace provided over a number of phases. The anticipated phasing of the retail floorspace coming forward over this period is provided at **Table 2a-d** at **Document 2**.

4.28 Based on this approach, for the Class E (or retail) floorspace the following average sales densities have been applied:

- Proposed foodstore: £10,000 per square metre for convenience goods / £7,000 per square metre for comparison goods;
- Other convenience: £5,000 per square metre; and
- Other comparison: £3,500 per square metre.

4.29 By applying these sales densities, the potential turnover of the proposed floorspace (coming forward on phased basis over the period to 2042) is provided at **Document 2**.

4.30 In understanding the likely trading effects of the proposal, it is important to reiterate that the residential element of the scheme will itself generate retail expenditure (identified to be in the region of £120 million once all the residential units have been completed). Much of the retail floorspace proposed will meet the day-to-day needs of this population.

4.31 For the purposes of this assessment, it is assumed that 75% of the on-site convenience expenditure is retained on site, with 50% of on-site comparison goods expenditure retained. Such an approach is entirely consistent with the approach undertaken within the RLNA when considering the likely retention levels of new retail floorspace at Otterpool Park. This equates to c. 59% of the on-site residential expenditure generated).

4.32 After allowing for this retention of on-site expenditure, there will remain approximately £50 million of retail expenditure that would be available to support existing and future retail floorspace elsewhere. This includes Folkestone, Hythe and Ashford. This substantial increase in 'local spend' has the potential to further support retail facilities in the district and wider sub-region. This is an important factor to take into account when considering the likely trading effects of the proposal. By not allowing for this 'spin off' expenditure benefits, the assessment undertaken in support of the application proposals is robust and will overstate the likely trading effects.

4.33 Much of the identified overall turnover of the proposal will be met by the substantial 'on site' expenditure generated by the new resident community. As previously highlighted, whilst it would be unrealistic to assume that all this expenditure will be retained by new facilities within the proposed new garden town, based on a consistent approach with the RLNA that approximately 59% is retained, the available retail expenditure to be retained in 2042 exceeds the potential turnover of the proposal – by £4.28 million in the convenience sector and by £1.84 million in the comparison sector. This is of significance when considering whether the proposal is likely to lead to a significant adverse impact (the policy test). It is this turnover that is the focus of the impact assessment undertaken.

4.34 However, it is acknowledged that much of the retail floorspace proposed will be delivered before the residential element of the scheme is fully completed. This is to provide a sense of

place for the new settlement and to provide the critical mass to achieve a viable and vibrant town centre.

4.35 Reflecting this, this impact assessment has assessed the trading effects in 2026 (which reflects the timeframe outlined in the PPG¹⁶) together with 2031, 2037 (the local plan period) and 2042 (the estimated end date for the delivery of the scheme) to provide a longer-term assessment.

4.36 It is in this context that the impact of the proposal needs to be considered.

Anticipated Trade Draw of the Proposal

4.37 When assessing impact, the PPG acknowledges the need to assess the potential impact of a scheme against other similar retailers in the area. The PPG¹⁷ states that:

“Retail uses tend to compete with their most comparable competitive facilities.”

4.38 It is necessary to understand the type of development proposed and current shopping patterns within the local area. As previously highlighted, the proposal seeks to principally serve the new resident community and employment uses created on site, but also (to a lesser extent) meet some of the day-to-day needs of the neighbouring areas.

4.39 To understand existing shopping patterns and the likely trade draw of the proposal, the findings of RLNA, which was underpinned by a household telephone survey, have been utilised. A summary of existing shopping patterns is provided at **Table 4a-e** and **Table 5a-e** at **Document 2**.

Effects of the Retail Floorspace Proposed

4.40 Table 4.1 provides a breakdown of the impact of the proposal based on the maximum parameters being sought by the proposal and assesses the trading effects of the proposal based on the overall turnover of existing centres (the policy test established by Secretary of State / Inspector decisions).

Table 4.1: Impact of the Proposed Class E(a) Floorspace on Main Centres

Centre	Impact			
	2026	2031	2037	2042
Hythe	-0.8%	-5.8%	-2.4%	+5.8%
Folkestone / Cheriton	0.0%	-1.1%	+0.2%	+1.2%
Ashford	+0.1%	-0.8%	+0.3%	+1.0%
Canterbury	+0.1%	-1.0%	+0.6%	+1.2%
New Romney	-0.1%	-0.4%	-0.2%	+0.4%
Dover	0.0%	-0.4%	0.0%	+0.4%

Table 10 at Document 2

¹⁶ Reference ID: 2b-018-20190722

¹⁷ Reference ID: 2b-015-20190722

- 4.41 The levels of impact identified for any centre will not be at a level that is likely to lead to a significant adverse impact upon their continued vitality and viability. The turnover of all existing centres post development (the impact test recognised in the Rushden Lakes Secretary of State decision) will continue to increase between 2021 and 2042 – even before allowing for the uplift of expenditure generated by the ‘on site’ expenditure not retained and available to support facilities elsewhere.
- 4.42 When considering the likely trading effects on existing centres, this is likely to be overstated. The approach of the RLNA (which has underpinned our assessment) does not distinguish between retail destinations within and outside existing centres. A significant proportion of the proposal’s retail turnover, beyond that from the new residents of Otterpool Park, will be derived from out-of-centre retail destinations, particularly in the convenience goods sector where there are a number of large-format out-of-centre retail outlets. Such destinations are afforded no policy protection. By grouping all the destinations under one ‘area’ (as has been agreed following direct discussions with F&HDC’s retail consultants) the potential impact on defined centres will be overstated.
- 4.43 In addition, by 2042, given that the potential turnover of the proposal is less than the on-site expenditure available to support new retail floorspace as part of the garden settlement (reflecting the appropriateness of the scale of retail floorspace proposed), neighbouring centres will see a positive impact due to the increased spending power in the local area
- 4.44 Given this, together with the fact that the retail floorspace can be supported by on-site expenditure, there is no evidence to suggest that the proposals will lead to a significant adverse impact. Critically, the quantum of retail floorspace reflects the quantum envisaged for Otterpool Park in adopted local planning policy.

Trading Effects of the Other Main Town Centres Use Proposed

- 4.45 The NPPF (para. 90) requires an impact assessment to be undertaken for retail and leisure development outside an existing centre and not in accordance with an up-to-date plan. As previously highlighted, it is expected that the bulk of the retail and F&B floorspace proposed will be supported by adopted local planning policy by the time the application is determined. However, to maintain the very robust approach of this assessment, the full trading effects of the other main town centre uses proposed has been undertaken.
- 4.46 In terms of the leisure uses proposed, these could include a community centre or hall, hotel, and other cultural uses or indoor sports provision. There is no commonly accepted approach to assessing the impact of such uses. However, again such uses will serve the new residential community and are at a scale that it is entirely appropriate to serve the new community. The scale of floorspace proposed is such that would not lead to the development being a destination that would seek to compete with the offer of neighbouring centres.
- 4.47 In addition, these types of uses would contribute to the wider place making objective set out within this application proposal and will serve the new community.
- 4.48 Given the nature of leisure uses proposed, an assessment of the likely impact is not deemed necessary. However, an assessment of the impact of the F&B floorspace proposed has been undertaken. This analysis is contained at **Document 3**.

- 4.49 Any impact associated with the F&B uses would be limited. As with retail expenditure, the new residential community will also generate substantial F&B expenditure (in the region of £37 million by 2042). This will be available to support a substantial quantum of F&B floorspace.
- 4.50 Based on 70% of expenditure being retained at Otterpool Park (as assumed as realistic by the RLNA) some £25.88 million of expenditure is identified to be available to support new F&B floorspace on-site. By way of comparison, the F&B floorspace is identified to generate a turnover of up to £18.20 million once the scheme is completed. The estimated turnover is considerably less than the on-site expenditure available.
- 4.51 It is acknowledged that the level of F&B floorspace (4,200 square metres) exceeds that identified by adopted local planning policy (of 3,305 square metres), albeit identified for period to 2037 and not 2042. The difference in floorspace capacity is principally reflective of the very high turnover density applied in the RLNA (of £5,000 per square metre) in estimating future F&B floorspace requirements. It is our view that this sales density is not representative of the likely turnover that would be achieved by F&B floorspace provided as part of a town centre to serve a new garden settlement.
- 4.52 Significantly, in capacity terms, the RLNA identifies capacity to support new F&B floorspace of £19.96 million by 2037. This is greater than the anticipated turnover of the proposal in both 2037 and 2042. As such, if a more realistic sales density is applied in estimating the likely turnover of the proposed F&B floorspace and a longer period is assessed (i.e. to 2042), it is our view that the quantum of floorspace proposed fits within the level of F&B floorspace that could be supported at Otterpool Park identified by the RLNA. As the F&B floorspace can be supported by on site expenditure, any impact will be negligible or nil.
- 4.53 It is in this context that the scale of F&B floorspace proposed and its likely impacts need to be considered.
- 4.54 Consistent with the assessment of the trading effects of the retail floorspace, the likely trading effects of the F&B floorspace has been undertaken based on its phased delivery over the period 2021 to 2042.
- 4.55 In understanding where the F&B element of the proposal will be derived from, consistent with the assessment of the trading effects of the retail element, the findings of the RLNA have been utilised. A summary of existing patterns for F&B use is contained at **Table 4a-e** at **Document 3**.
- 4.56 As previously highlighted, the bulk of the proposal's turnover will be derived from the on-site expenditure generated, the residual turnover. By 2042 the level of 'on site' expenditure will exceed the potential turnover of the F&B floorspace (by more than £7 million). As a result of the increased spending power in the local area, neighbouring centres could see an increase in turnover post development.
- 4.57 In terms of the identified levels of impact in the preceding period to 2042, whilst the level of turnover marginally exceeds the on-site expenditure generated in the early stages of delivery for place making reasons to deliver the necessary critical mass of commercial floorspace, this is limited (up to £2.74 million), and any turnover not supported by on-site expenditure during this period will be derived from a variety of locations both within and outside the district broadly

on the basis of existing patterns of activity on a zone-by-zone basis, taking into account the nature of the proposals and the strength and proximity of competing provision (as outlined at **Table 5 at Document 3**).

4.58 Table 4.2 provides a summary of the likely trading effects of the F&B floorspace over the development timeframe until 2042.

Table 4.2: Impact of the Proposed Class F&B Floorspace on Main Centres

Centre	Impact			
	2026	2031	2037	2042
Hythe	-0.6%	-3.0%	-1.5%	+7.4%
Folkestone / Cheriton	-0.1%	-0.5%	-0.2%	+1.2%
Ashford	-0.1%	-0.7%	-0.3%	+1.7%
New Romney	-0.1%	-0.2%	-0.1%	+0.6%
Dover	-0.2%	-1.1%	-0.6%	+2.7%
Canterbury	0.0%	-0.1%	-0.1%	+0.3%

Table 6 at Document 3

4.59 The above analysis shows the impact of the F&B offer will be limited (highest impact on Hythe of -3.0% in 2031). Such low levels and will not undermine the vitality and viability of existing centres.

4.60 In monetary terms the trade diversion from any centre will be limited and more than offset by the forecast growth in turnover of each centre post development. Post development all centres will see a substantial increase in F&B turnover – as outlined at Table 6 at Document 3.

4.61 Whilst the levels of impact are higher during earlier phases of delivery (for example in 2031 and 2037 when the number of residential units completed will be proportionally less to the F&B floorspace), the identified impacts remain at levels that are not deemed significant adverse. Critically, throughout the development programme the F&B turnover of all destinations will increase post completion of the Otterpool Park garden settlement development in 2042.

4.62 Overall, there is no evidence to suggest that the proposed floorspace is likely to lead to a significant adverse impact. As outlined above, based on applying realistic turnover assumptions, the quantum of F&B floorspace proposed is broadly in line with the capacity identified by the RLNA.

Impact on Neighbouring Centres

4.63 Building upon the analysis outlined above, a summary of the trading effects of the proposal on the vitality and viability of the following neighbouring centres within the local area is provided:

- Hythe town centre;
- Folkestone town centre;
- New Romney town centre;

- Ashford town centre (within the neighbouring authority of Ashford Borough Council); and
- Cheriton district centre.

4.64 A summary of the overall impact of the retail and F&B turnover of the neighbouring centres is provided at Table 4.3.

Table 4.3: Impact of the Proposed Development (Retail and F&B) on Existing Centres

Centre	Impact			
	2026	2031	2037	2042
Hythe	-0.8%	-4.9%	-2.1%	+6.3%
Folkestone / Cheriton	0.0%	-1.0%	+0.1%	+1.2%
Ashford	0.0%	-0.8%	+0.2%	+1.1%
Dover	0.0%	-0.4%	-0.1%	+0.7%
New Romney	-0.1%	-0.4%	-0.2%	+0.5%

Source: Table 1 at Document 4

4.65 Further consideration of the above impacts on the key centres is provided below.

Hythe Town Centre

4.66 Hythe is designated a town centre within the development plan and is located approximately 6 kilometres south east of the proposed development.

4.67 Hythe is principally a linear centre with retail activity focused along High Street between Station Road and Malthouse Hill, and includes representation from Iceland, Boots, WH Smith and a range of independent retailers and local service providers. The town centre (as defined by Experian Goad) is identified to contain 210 units occupying approximately 26,510 square metres of floorspace¹⁸.

4.68 Based on the findings of the RLNA (updated where appropriate), Hythe is identified to achieve a retail / F&B turnover of approximately £131 million in 2021.

4.69 Reflecting the existing offer of the town centre, our assessment demonstrates that the proposal will have a limited impact on Hythe – the highest impact being up to -4.9% in 2031). Such a level of impact cannot be viewed as significant adverse given the strength, role and function of the town centre.

4.70 Hythe is identified to be performing well with vacancies accounting for just 6.7% of all units (or 9.8% of total floorspace). This compares favourably to the national average of 15.6% and 15.9% respectively. Accordingly, despite the impact of the ongoing Covid-19 pandemic, which has an effect on the retail sector does not appear to have adversely impacted on the vitality and viability of Hythe. The proportion of vacancies is comparable to the position in 2016, when

¹⁸ Experian Goad (updated by Quod October 2021)

9.2% of units were identified to be vacant¹⁹. The vacancy rate in Hythe does not suggest a centre that is in decline or poorly performing.

- 4.71 Furthermore, by 2042 the overall impact of the scheme will be positive on Hythe due to the increase in spending power in the local area that is generated by the proposed new settlement.
- 4.72 Overall, the limited impacts of the proposal will not undermine the long-term vitality and viability of Hythe, which will continue to serve an important role as a retail and service destination for residents.

Folkestone Town Centre

- 4.73 Folkestone is the largest centre in the district and is located approximately 12 kilometres south east of the proposed development.
- 4.74 Commercial activity is focused along a pedestrianised 'high street' (Sandgate Street) together with a covered shopping area (Bouverie Place). The latest Experian Goad report²⁰ identifies that the town centre contains 386 outlets occupying more than 73,000 square metres of floorspace.
- 4.75 Folkestone contains a number of major retailers, including representation from Sainsbury's, Next, Asda and Primark. The comparison retail sector is well represented, with 36.7%²¹ of units falling within this sector against a national average of 34.3%. In addition to its retail offer, the Town Centre also has a wide service and F&B offer.
- 4.76 Drawing upon the findings of the RLNA, the Town Centre (along with the neighbouring Cheriton district centre, which was grouped with Folkestone in the study) is identified to achieve a retail and F&B turnover in excess of £513 million in 2021²². Given the strength of the existing offer of the town centre, the proposals are identified to have only a modest impact – up to -1.0% by 2031).
- 4.77 Such low levels of impact will not undermine the long-term vitality and viability of Folkestone, which is identified to performing well. Whilst the proposition of vacant units is marginally above the national average, vacant floorspace (at 14.9%) is below the national average (15.9%). In addition, vacancies have declined since 2018, when they represented 22.2%²³ of all units.
- 4.78 Again, vacancy levels do not suggest that the town centre is vulnerable and will be adversely impacted upon by the modest levels of impact identified. Furthermore, post development, the turnover of the centre will continue to increase in all impact years tested through to completion of the proposed development in 2042.
- 4.79 Overall, Folkestone town centre is performing well. The centre has a good convenience offer, as well as a high level of comparison retailers, cafes, restaurants and other services. The centre was busy on the day of our site visit and vacancies have decreased in recent years. It can therefore be determined that the centre is in good health. There is no evidence to suggest

¹⁹ Experian Goad, 2016

²⁰ June 2021

²¹ *Ibid*

²² Although this includes Cheriton district centre which was grouped with Folkestone within the RLNA

²³ Experian Goad, 2018

that the proposal is likely to lead to a significant adverse impact on the vitality and viability of the centre. Folkestone will continue to be the principal retail destination in the district drawing trade from a wide area, together with attracting tourism, which itself will generate expenditure to support the Town Centre.

New Romney Town Centre

- 4.80 New Romney is a market town located approximately 14 kilometres south of the proposed development. Retail activity is focused along High Street, which comprises predominantly independent retailers.
- 4.81 As recognised by the Shepway Town Centre Study²⁴, the town also has an important tourism function, serving the focal point for a number of heritage and outdoor activities. This tourism expenditure will further support the town centre businesses.
- 4.82 Drawing upon the findings of the RLNA, New Romney is identified to achieve a retail and F&B turnover in excess of £53 million, the bulk of which (c. 56%) is generated by the convenience retail sector. This role will not be undermined by the proposed development, where any foodstore will be limited in size to no more than 500 square metres.
- 4.83 Reflecting the role and function of New Romney, and the nature of development proposed, the identified impact will be limited (up to -0.4% in 2031). Such low levels of impact will not undermine the long-term vitality and viability of the centre. New Romney is identified to be performing well, with a convenience and service role alongside a tourist base for the wider Romney Marsh area. Vacancies also remain very low within the town centre (representing just 4% of all units²⁵).
- 4.84 In addition, post development of all the commercial floorspace proposed as part of the Otterpool Park garden settlement development, the turnover of Romney town centre continues to increase throughout the period to 2042 – the test set by the Rushden Lakes Secretary of State decision.
- 4.85 Against this background, there is no evidence to suggest that the proposed development will undermine the long-term vitality and viability of New Romney.

Ashford Town Centre

- 4.86 Ashford is the largest centre within the neighbouring authority of Ashford Borough Council and is located approximately 10 kilometres north west of the proposed new settlement. The Primary Shopping Area (as defined by the Local Plan) extends from the railway station from the south to Park Street to the north. The core area (i.e. the primary retail frontage) focuses on the Park Mall and County Square shopping centres and High Street. The town centre comprises a mix of national and independent retailers. This includes representation from retailers such as Sports Direct, Next and River Island.

²⁴ Undertaken by PBA on behalf of Shepway District Council

²⁵ Experian Goad, updated October 2021

- 4.87 Overall, the town centre is identified to comprise 310 units²⁶. Vacancies account for 21.9% of all units, which is above to the national average (15.8%)²⁷. Vacancies include the large-format Debenhams and M&S have become vacant in recent years. Although vacancies are above the national average, this has been a longstanding issue in Ashford. For example, the Ashford Retail and Leisure Needs Assessment (June 2015) identified above average vacancies, particularly around the two shopping centres of County Square
- 4.88 However, there has been investment in recent years, and further is planned, including the Commercial Quarter and the redevelopment of Elwick Place, which will strengthen the overall attraction of the town centre.
- 4.89 Our analysis identifies that Ashford achieves an overall retail and F&B turnover to be over £194 million in 2021, with the proposed development having a limited impact – of up to -0.8% in 2031.
- 4.90 Whilst such a low level of impact will not undermine the long-term vitality and viability of Ashford, this impact is likely to be overstated due to the turnover of the town centre being underestimated. The turnover of Ashford for the purposes of our assessment has been based on the findings of the RLNA. However, Ashford falls outside the study area adopted for the RLNA. As such, the full extent of the retail catchment of Ashford town centre has not been included. If the full catchment was to be included the turnover of the town centre would increase. Indeed, the Ashford Retail Leisure Needs Assessment²⁸, identified that the town centre achieved a retail turnover of more than £289 million in 2020. This is substantially greater than retail turnover identified for Ashford by the RLNA (£169 million). This retail turnover increases to more than £742 million if you include edge and out-of-centre facilities in Ashford²⁹.
- 4.91 Within this context, notwithstanding the fact that we do not consider the levels of impact identified on Ashford to be significant (of up to -0.8%), this is overstated and by applying a more realistic estimate of the turnover of retail facilities in Ashford the levels of impact would be substantially lower.
- 4.92 Against this background, there is no evidence to suggest that the proposal will lead to a significant adverse impact.

Cheriton District Centre

- 4.93 Cheriton is principally a linear centre, with commercial activity focused along Cheriton Road / Cheriton High Street. The District Centre is located approximately nine kilometres from the proposed development.
- 4.94 The district centre contains 123 outlets within over 15,800 square metres of floorspace³⁰. The centre's 'offer' is dominated by independent operators, which reflects its close proximity to the larger centre of Folkestone. Reflecting its existing offer, the centre serves a localised role for the surrounding residential community. Cheriton is identified to be performing well, with

²⁶ Experian Goad, December 2020

²⁷ Experian Goad

²⁸ Undertaken on behalf of Ashford Borough Council

²⁹ The RLNA does not separate out-of-centre facilities which are afforded no policy protection where the proposal will derive some trade. As such the level of trade diversion will be overstated.

³⁰ Experian Goad, updated by Quod, October 2021

vacancies in October 2021 accounting for 8.9% of outlets and 8.3% of floorspace, which is well below the national average (15.6% and 15.9% respectively).

- 4.95 Due to the approach of the RLNA grouping the turnover of Cheriton with nearby Folkestone it is not possible to assess the specific trading effects of the proposal on the District Centre. However, given the current role and performance, any impact on Cheriton will be limited and will not undermine its long-term vitality and viability.

Other Centres

- 4.96 In terms of impact on other nearby centres such as Lyminge and Sellinge, these are defined as Local Centres within the adopted development plan serving a localised role. This role will continue alongside the proposed development, which will principally meet the on site needs of the new residential community.
- 4.97 For example, Sellindge local centre is identified to contain just six retail units, including a small format Co-op store, alongside a number of local services including doctor's surgery and primary school. These facilities provide an important role for the local community, and this role continue alongside the proposed development.
- 4.98 Due to the fact that the scale of retail and F&B floorspace reflects the on-site needs created by the new residential community, there is no evidence to suggest that the proposal will undermine the role and function of small local centres in the surrounding area.

Impact on Local Consumer Choice

- 4.99 Paragraph 90 of the NPPF requires local planning authorities to assess the impact the proposals have on consumer choice.
- 4.100 The application proposals will improve the choice and distribution in accessible location through the provision of a vibrant town centre to meet the future residential community of Otterpool Park (as envisaged by adopted local planning policy). The development will have the positive effect of reducing the need for residents to travel to destinations further afield but will also improve consumer choice – in line with Government objectives. Thus, the proposals will significantly benefit, rather than adversely impact upon local consumer choice.

Summary

- 4.101 The projected retail spend that will become established as Otterpool Park is delivered will be such that the proposed retail and F&B floorspace will be supported by the needs of the resident community. Whilst there may be some impact on existing centres (which is likely to be overstated due to the robust approach undertaken), this will be limited. As previously highlighted the policy requirement is for there to be demonstrable evidence that the development is likely to have a significant adverse impact. It has been demonstrated that this is not the case in this instance.
- 4.102 The limited impact reflects the fact that the quantum of retail floorspace, and the vast majority of F&B floorspace, reflects the scale of floorspace identified by the RLNA as being supported

by the on-site residential expenditure that could realistically be retained by the new community at Otterpool Park.

- 4.103 Post development of all the commercial floorspace proposed being delivered at Otterpool Park, once the new settlement is delivered, the turnover of all neighbouring centres will increase. There is also the potential for those defined centres closest to the new settlement to benefit from the increase in locally generated expenditure and footfall.
- 4.104 Likewise, the nature and scale of other leisure uses proposed is entirely appropriate for a new settlement of the proposed scale and there is no suggestion that such uses will adversely impact in a material way on the vitality and viability of neighbouring centres.
- 4.105 There is also no evidence to suggest that the proposals will undermine future and planned investment in centres elsewhere. Critically, the retail floorspace being proposed is location specific to principally meet the needs of the new community and is supported by adopted local planning policy, which is well advanced. As such, the retail floorspace is not seeking to meet the same market opportunity of investment planned elsewhere.
- 4.106 Instead, the wider positive impacts associated with the retail and F&B floorspace proposed (such as sustainability and place making), coupled with the increase in locally generated expenditure available to support other centres, far outweigh any perceived adverse impacts.

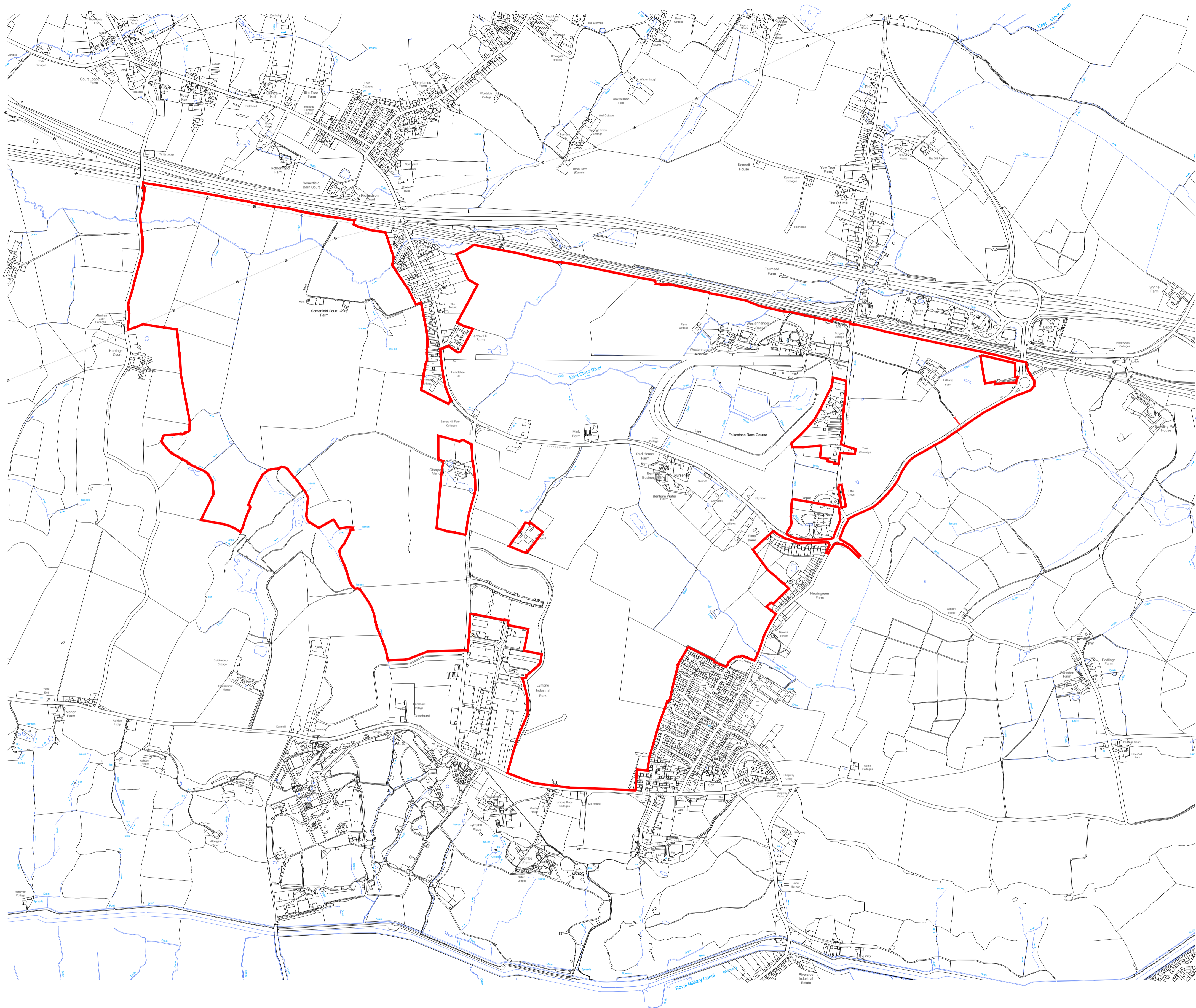
5 Conclusions

- 5.1 This RIA has been prepared by Quod on behalf of Otterpool Park LLP to justify the retail and other main town centre floorspace proposed within the overall planning application for the delivery of a new garden settlement, taking into account the development plan and material considerations.
- 5.2 It has been demonstrated that the main town centre uses proposed is entirely proportionate to the new residential community created. The overall quantum of retail floorspace proposed (15,000 square metres) can be supported by the on-site expenditure generated and is comparable to that envisaged by adopted local planning policy (13,392 square metres by 2037), which is well advanced. Further population and expenditure growth post 2037 through to 2042 (the anticipated timeframe for the delivery of the planning application) will be available to support further retail floorspace.
- 5.3 Likewise, the level of F&B floorspace (up to 4,200 square metres) reflects the findings of the Council's retail evidence and adopted policy in terms of the level of floorspace that could be supported at Otterpool Park.
- 5.4 As such, the level of retail and F&B floorspace proposed is location specific in terms of seeking to meet the needs of the new community – as envisaged by adopted local planning policy. The main town centres are also location specific in respect of place making and encouraging sustainability. Against this background, there is no requirement to address the sequential approach to site selection in this instance.
- 5.5 With regard to retail impact, on-site residents will generate substantially more retail expenditure than the expected turnover of the proposal. Accordingly, the fact that a substantial quantum of expenditure is generated on site means that any impact on existing centres will not be significant adverse (the policy test). The levels of impact identified on any centre are not deemed to be significant, and post development of the commercial floorspace to be delivered from the Otterpool Park garden settlement, the retail turnover of all neighbouring centres will continue to increase over the period to 2042.
- 5.6 The retail and F&B floorspace proposed will principally meet the needs of the new residential community. Any impact on existing centres (either in terms of vitality and viability and investment) will not be significantly adverse. Instead, the increase in population and available expenditure, which will not all be met by the retail floorspace being proposed, means that there is an opportunity for neighbouring centres to benefit from increased population and expenditure in the local area.
- 5.7 Overall, the proposals are in accordance with relevant national and local retail planning policy and there is no retail policy reason why planning permission should not be granted.





Document 1

Site Location Plan



— Application Red Line Boundary

 <p>OTTERPOOL PARK COUNTRYSIDE · CONNECTED · CREATIVE</p>	CLIENT	REVISIONS	DATE	STATUS	SCALE	PROJECT	DRAWING NAME	DRAWING NUMBER	
	Otterpool Park LLP	rev A: 18-08-17 rev B: 21-08-17 rev C: 21-08-17 rev D: 21-08-17 rev E: 04-09-17 rev F: 02-01-18 rev G: 28-02-18 rev H: 09-05-18	rev J: 17-07-18 rev K: 24-08-18 rev L: 09-09-18 rev M: 17-09-18 rev N: 19-09-18 rev P: 16-10-18 rev Q: 11-02-19 rev R: 25-10-19	11-07-17	FOR APPROVAL	1:10,000 @ A1	OTTERPOOL PARK	APPLICATION RED LINE BOUNDARY	



Document 2

Retail Impact Analysis

Table 1: Population and Expenditure Generated by New Settlement

Year	No. of Dwellings	Population	Average Expenditure per Capita (£)		Turnover (£m)		Total
			Convenience	Comparison	Convenience	Comparison	
2021	0	0	2,570	3,630	0.00	0.00	0.00
2026	716	1,504	2,509	4,028	3.77	6.06	9.83
2031	2,968	6,233	2,491	4,526	15.53	28.21	43.74
2037	5,059	10,624	2,494	5,290	26.50	56.20	82.69
2042	8,500	17,850	2,499	6,049	44.61	107.98	152.59

Notes:

1. Population based on number of homes delivered and assuming an average household size of 2.1 occupants per household
2. Average expenditure per capita based on the average identified for the Study Area (Table 3b and Table 3c)
3. Turnover = population x expenditure per capita

At 2020 Prices

Table 2a: Potential Turnover of Proposed Retail Floorspace (Class E(a)) in 2026

	Gross Floorspace (sq m)		Net Floorspace (sq m)		Sales Density (£ per sq m)		Turnover (£m)	
	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison
Retail (Class E(a))	1,500		1,100		-	-	4.30	2.07
Foodstore	500		350		10,000	7,000	2.80	0.49
Other - convenience	400		300		5,000	0	1.50	0.00
Other - comparison	600		450		0	3,500	0.00	1.58

- Notes:**
1. Net floorspace identified to be 70% of the gross floorspace for the foodstore and 70% for other floorspace
 2. Sales densities based on professional judgements informed by the nature of development
 3. Turnover = net floorspace x sales density

At 2020 Prices

Table 2b: Potential Turnover of Proposed Retail Floorspace (Class E(a)) in 2031

	Gross Floorspace (sq m)		Net Floorspace (sq m)		Sales Density (£ per sq m)		Turnover (£m)	
	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison
Retail (Class E(a))	11,250		8,413				19.63	22.12
Foodstore	500		350		10,000	7,990	3.50	2.80
Other - convenience	4,300		3,225		5,000	0	16.13	0.00
Other - comparison	6,450		4,838		0	3,995	0.00	19.32

- Notes:**
1. Net floorspace identified to be 70% of the gross floorspace for the foodstore and 75% for other floorspace
 2. Sales densities based on professional judgements informed by the nature of development, and allows for increase in turnover efficiency in line with the latest estimates provided by Experian (Retail Planner Briefing Note 18, October 2020)
 3. Turnover = net floorspace x sales density

At 2020 Prices

Table 2c: Potential Turnover of Proposed Retail Floorspace (Class E(a)) in 2037

	Gross Floorspace (sq m)		Net Floorspace (sq m)		Sales Density (£ per sq m)		Turnover (£m)	
	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison
Retail (Class E(a))	15,000		11,225				25.25	33.67
Foodstore	500		350		10,000	9,320	3.50	3.26
Other - convenience	5,800		4,350		5,000	0	21.75	0.00
Other - comparison	8,700		6,525		0	4,660	0.00	30.41

- Notes:**
1. Net floorspace identified to be 70% of the gross floorspace for the foodstore and 75% for other floorspace
 2. Sales densities based on professional judgements informed by the nature of development, and allows for increase in turnover efficiency in line with the latest estimates provided by Experian (Retail Planner Briefing Note 18, October 2020)
 3. Turnover = net floorspace x sales density

At 2020 Prices

Table 2d: Potential Turnover of Proposed Retail Floorspace (Class E(a)) in 2042

	Gross Floorspace (sq m)		Net Floorspace (sq m)		Sales Density (£ per sq m)		Turnover (£m)	
	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison
Retail (Class E(a))	15,000		11,225				25.25	38.28
Foodstore	500		350		10,000	10,596	3.50	3.71
Other - convenience	5,800		4,350		5,000	0	21.75	0.00
Other - comparison	8,700		6,525		0	5,298	0.00	34.57

- Notes:**
1. Net floorspace identified to be 70% of the gross floorspace for the foodstore and 80% for other floorspace
 2. Sales densities based on professional judgements informed by the nature of development, and allows for increase in turnover efficiency in line with the latest estimates provided by Experian (Retail Planner Briefing Note 18, October 2020)
 3. Turnover = net floorspace x sales density

At 2020 Prices

Table 2e: Proportion of Turnover Generated by Residential Development

	Total Spending Generated (£m)				Potential Retained Spending (%)	Potential Retained Spending (£m)				Turnover of Proposal from Non On-site Residents (£m)			
	2026	2031	2037	2042		2026	2031	2037	2042	2026	2031	2037	2042
Convenience	3.77	15.53	26.50	44.61	75%	2.83	11.65	19.87	33.45	1.47	7.98	5.38	-8.20
Comparison	6.06	28.21	56.20	107.98	50%	3.03	14.10	28.10	53.99	-0.96	8.02	-5.98	-15.71
Total	9.83	43.74	82.69	152.59	-	5.86	25.75	47.97	87.45	0.51	15.99	-0.60	-23.92

- Notes:**
1. Total Spending Generated taken from Table 1
 2. Proportion retained spending derived from Folkstone & Hythe Retail and Leisure Need Assessment 2018 Update (Amended June 2019)
 3. Turnover of Proposal taken from Table 2b
 4. Proportion of retained spending to turnover equates to turnover of proposal expressed as a proportion of retained spending

At 2020 Prices

Table 2f: Trade Draw of Proposal (2026)

	Study Area							Sub-Total Study Area	Elsewhere	Total
	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7			
Trade draw (%)	10.0%	75.0%	3.5%	0.5%	2.5%	5.0%	1.0%	97.5%	2.5%	100.0%
Convenience										
Available Expenditure (£m)	127.27	49.51	41.63	37.42	37.69	38.81	48.62	380.96	-	-
Trade draw to Proposal (£m)	0.15	1.10	0.05	0.01	0.04	0.07	0.01	1.43	0.04	1.47
Resultant Market Share	0.1%	2.2%	0.1%	0.0%	0.1%	0.2%	0.0%	0.4%	-	-
Comparison										
Available Expenditure (£m)	185.87	79.50	63.09	55.34	65.29	66.22	83.25	598.55	-	-
Trade draw to Proposal (£m)	-0.10	-0.72	-0.03	0.00	-0.02	-0.05	-0.01	-0.94	-0.02	-0.96
Resultant Market Share	-0.1%	-0.9%	-0.1%	0.0%	0.0%	-0.1%	0.0%	-0.2%	-	-

- Notes:**
1. Trade draw of proposal based on professional assumptions taking into account the nature of development and existing shopping patterns
 2. Available expenditure taken from Table 3d and Table 3e
 3. Turnover of Proposal taken from Table 2b
 4. Proportion of retained spending to turnover equates to turnover of proposal expressed as a proportion of retained spending

At 2020 Prices

Table 3a: Population within Study Area

	Zone 1	Zone 2	Zone 3	Survey Zone Zone 4	Zone 5	Zone 6	Zone 7	TOTAL
2021	53,236	18,696	16,763	14,406	13,040	15,334	17,057	149,432
2026	55,055	19,190	17,239	15,007	14,618	15,993	17,632	154,734
2031	56,733	19,584	17,682	15,482	15,221	16,566	18,132	159,400
2037	58,847	19,879	18,063	16,000	15,848	17,162	18,717	164,516
2042	60,611	20,078	18,369	16,436	16,365	17,645	18,801	168,304

Notes:

1. Population derived from Experian Location Analyst (January 2022) (2021 estimates)

Table 3b: Expenditure per Capita (Convenience)

	Zone 1	Zone 2	Zone 3	Survey Zone Zone 4	Zone 5	Zone 6	Zone 7
2020	2,669	2,979	2,788	2,879	2,977	2,802	3,184
2020 (excluding SFT @6.3%)	2,501	2,791	2,612	2,698	2,789	2,625	2,983
2021	2,368	2,643	2,474	2,555	2,642	2,486	2,825
2026	2,312	2,580	2,415	2,494	2,578	2,427	2,758
2031	2,296	2,562	2,398	2,476	2,560	2,410	2,738
2037	2,298	2,565	2,400	2,479	2,563	2,412	2,741
2042	2,302	2,570	2,405	2,484	2,568	2,417	2,747

Notes:

1. Expenditure per capita taken from Experian Location Analyst (January 2022) (2020 estimates)
2. Growth rates in line with the latest estimates published by Experian (Figure 6 of Appendix 3 to Experian Retail Planner Briefing Note 18, October 2020)
3. Makes allowance for Special Forms of Trading (e.g. online shopping) in line with the latest estimates published by Experian for 2020 (Figure 5 of Appendix 3 to Experian Retail Planner Briefing Note 18, October 2020)

At 2020 Prices

Table 3d: Expenditure (Convenience)

	Zone 1	Zone 2	Zone 3	Survey Zone Zone 4	Zone 5	Zone 6	Zone 7	TOTAL
2021	126.08	49.42	41.47	36.80	36.82	38.13	48.19	376.91
2026	127.27	49.51	41.63	37.42	37.69	38.81	48.62	380.96
2031	130.23	50.18	42.40	38.34	38.97	39.92	49.65	389.69
2037	135.22	50.98	43.36	39.66	40.62	41.40	51.31	402.54
2042	139.55	51.60	44.18	40.82	42.03	42.65	51.64	412.46

Notes:

1. Expenditure = population (Table 3a) x expenditure per capita (Table 3b)

At 2020 Prices

Table 3c: Expenditure per Capita (Comparison)

	Zone 1	Zone 2	Zone 3	Survey Zone Zone 4	Zone 5	Zone 6	Zone 7
2020	3,651	4,480	3,958	3,988	4,830	4,478	5,106
2020 (excluding SFT @22.9%)	2,815	3,454	3,062	3,075	3,724	3,453	3,937
2021	3,043	3,734	3,299	3,324	4,026	3,732	4,256
2026	3,376	4,143	3,660	3,686	4,466	4,141	4,721
2031	3,794	4,655	4,113	4,144	5,019	4,653	5,305
2037	4,434	5,441	4,807	4,843	5,866	5,438	6,201
2044	5,071	6,222	5,497	5,539	6,708	6,219	7,091

Notes:

1. Expenditure per capita taken from Experian Location Analyst (January 2022) (2020 estimates)
2. Growth rates in line with the latest estimates published by Experian (Figure 6 of Appendix 3 to Experian Retail Planner Briefing Note 18, October 2020)
3. Makes allowance for Special Forms of Trading (e.g. online shopping) in line with the latest estimates published by Experian for 2020 (Figure 5 of Appendix 3 to Experian Retail Planner Briefing Note 18, October 2020)

At 2020 Prices

Table 3e: Expenditure (Comparison)

	Zone 1	Zone 2	Zone 3	Survey Zone Zone 4	Zone 5	Zone 6	Zone 7	TOTAL
2021	161.99	69.81	55.30	47.88	56.12	57.23	72.59	520.92
2026	165.87	79.50	63.09	55.34	65.29	66.22	83.25	598.55
2031	215.22	91.16	72.72	64.15	78.39	77.08	98.20	693.93
2037	260.92	108.15	86.82	77.49	92.96	93.33	116.06	835.74
2044	307.33	124.92	100.97	91.03	109.77	109.73	133.33	977.09

Notes:

1. Expenditure = population (Table 3a) x expenditure per capita (Table 3b)

At 2020 Prices

Table 6: Trade Draw of Proposal (Convenience Goods) (2026)

Description	Zone 1			Zone 2			Zone 3			Survey Zone			Zone 5			Zone 6			Zone 7			Sub-total Survey Zones				Elsewhere	TOTAL TURNOVER (Pm)										
	Existing Market Share	Drawdown in Proposal (Gt)	Resultant Turnover (Gt)	Existing Market Share	Drawdown in Proposal (Gt)	Resultant Turnover (Gt)	Existing Market Share	Drawdown in Proposal (Gt)	Resultant Turnover (Gt)	Existing Market Share	Drawdown in Proposal (Gt)	Resultant Turnover (Gt)	Existing Market Share	Drawdown in Proposal (Gt)	Resultant Turnover (Gt)	Existing Market Share	Drawdown in Proposal (Gt)	Resultant Turnover (Gt)	Existing Market Share	Drawdown in Proposal (Gt)	Resultant Turnover (Gt)	Market Share	Turnover (Gt)	Drawdown in Proposal (Gt)	Resultant Turnover (Gt)												
Available Expenditure			0.13			1.10			0.02			0.01			0.04			0.02			0.02			0.01			0.01			0.04			0.01			1.47	
Zone 1 - Fifelestone / Chertton	90.2%	90.0%	0.13	17.1%	17.0%	0.19	15.1%	15.0%	0.01	2.7%	3.0%	0.00	6.0%	6.0%	0.00	68.0%	68.0%	0.00	13.9%	14.0%	0.00	26.6%	0.00	30.0%	0.01										0.39		
Zone 2 - Hythe	4.1%	4.0%	0.01	79.8%	79.5%	0.88	26.6%	27.0%	0.01	3.7%	3.5%	0.00	9.9%	10.0%	0.00	4.7%	5.0%	0.00	4.7%	4.8%	0.00	63.1%	0.00	30.0%	0.01											0.30	
Zone 3 - New Romney	0.1%	0.0%	0.00	0.4%	0.5%	0.01	39.9%	40.0%	0.02	28.3%	28.0%	0.00	0.3%	0.3%	0.00	0.2%	0.0%	0.00	0.0%	0.0%	0.00	2.0%	0.00	6.0%	0.00												0.03
Other in District (Zone 4/5)	2.1%	2.0%	0.00	0.5%	0.5%	0.01	0.8%	1.0%	0.00	2.9%	3.0%	0.00	8.2%	8.3%	0.00	18.8%	18.8%	0.01	2.7%	2.8%	0.00	1.9%	0.00	10.0%	0.00											0.03	
District Total	96.5%	96.0%	0.14	97.8%	97.5%	1.08	82.6%	83.0%	0.04	37.6%	37.5%	0.00	36.4%	36.3%	0.01	91.0%	91.0%	0.07	31.3%	31.8%	0.06	92.6%	0.00	76.0%	0.04											1.37	
Rest of study area (outside District)	0.0%	0.0%	0.00	0.1%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	3.2%	3.0%	0.00	0.1%	0.0%	0.00	3.2%	3.2%	0.00	0.1%	0.00	0.5%	0.00											0.00	
RAFaird	1.3%	1.0%	0.00	2.1%	2.0%	0.02	16.0%	16.0%	0.01	23.6%	23.0%	0.00	69.9%	69.0%	0.03	1.2%	1.0%	0.00	18.6%	18.5%	0.00	4.4%	0.00	13.0%	0.00												0.07
Cartersley	0.3%	0.0%	0.00	0.1%	0.0%	0.00	0.0%	0.0%	0.00	0.1%	0.0%	0.00	0.7%	0.0%	0.00	0.9%	0.0%	0.00	23.3%	23.0%	0.00	6.3%	0.00	2.0%	0.00											0.00	
Claver	1.3%	1.0%	0.00	0.1%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	4.9%	4.0%	0.00	0.0%	0.0%	0.00	24.8%	24.8%	0.00	0.7%	0.00	4.0%	0.00											0.01	
Espe	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	19.5%	20.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.1%	0.00	0.5%	0.00												0.01
Faversham	0.0%	0.0%	0.00	0.7%	0.5%	0.01	0.0%	0.0%	0.00	3.9%	4.0%	0.00	1.0%	1.0%	0.00	0.4%	0.5%	0.00	0.5%	0.5%	0.00	0.5%	0.00	2.0%	0.00											0.01	
Essex	0.8%	0.0%	0.00	0.1%	0.0%	0.00	0.1%	0.0%	0.00	15.0%	15.0%	0.00	0.4%	0.5%	0.00	1.4%	1.5%	0.00	8.3%	8.5%	0.00	0.9%	0.00	2.0%	0.00												0.01
Outside Study Area Total	2.5%	2.3%	0.01	3.2%	2.8%	0.03	17.6%	17.6%	0.03	64.4%	62.5%	0.00	78.6%	76.9%	0.03	8.3%	8.2%	0.01	18.7%	18.5%	0.01	6.4%	0.00	24.0%	0.04												0.10
TOTAL	100.0%	100.0%	0.15	100.0%	100.0%	1.10	100.0%	100.0%	0.07	100.0%	100.0%	0.01	100.0%	100.0%	0.04	100.0%	100.0%	0.07	100.0%	100.0%	0.07	100.0%	1.03	100.0%	0.04											1.47	

Notes:
 1. Existing market shares taken from Table 4a
 2. Turnover of proposal taken from Table 6f
 3. Drawdown in proposal based on professional assumptions taking into account existing shopping patterns and the nature of development proposed
 4. Resultant turnover = turnover pre development minus trade drawdown in proposal

Table 7: Trade Draw of Proposal (Comparison Goods) (2026)

Description	Survey Zone																					Sub-area Survey Zones				TOTAL TURNOVER (Zn)					
	Existing Market Share	Deviation to Proposal (Zn)	Resultant Turnover (Zn)	Existing Market Share	Deviation to Proposal (Zn)	Resultant Turnover (Zn)	Existing Market Share	Deviation to Proposal (Zn)	Resultant Turnover (Zn)	Existing Market Share	Deviation to Proposal (Zn)	Resultant Turnover (Zn)	Existing Market Share	Deviation to Proposal (Zn)	Resultant Turnover (Zn)	Existing Market Share	Deviation to Proposal (Zn)	Resultant Turnover (Zn)	Existing Market Share	Deviation to Proposal (Zn)	Resultant Turnover (Zn)	Existing Market Share	Deviation to Proposal (Zn)	Resultant Turnover (Zn)	Existing Market Share		Deviation to Proposal (Zn)	Resultant Turnover (Zn)			
Available Expenditure			-0.15			-0.72			-0.23			0.00			-0.23			0.00			-0.15			0.00			-0.24			-0.12	
Zone 1 - Fifehouse / Chertton	75.6%	70.0%	-0.07	45.9%	43.5%	-0.31	21.3%	20.0%	-0.01	10.8%	10.0%	0.00	8.3%	7.0%	0.00	69.9%	60.0%	-0.03	10.2%	9.3%	0.00	44.0%	-0.01	20.0%	-0.01	0.00	0.00	10.0%	0.00	0.00	
Zone 2 - Hylhe	1.5%	1.0%	0.00	17.5%	15.0%	-0.11	4.5%	4.0%	0.00	1.8%	1.5%	0.00	1.0%	1.0%	0.00	1.6%	1.3%	0.00	0.6%	0.5%	0.00	11.6%	-0.11	10.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Zone 3 - New Romney	0.0%	0.0%	0.00	0.1%	0.0%	0.00	10.4%	10.0%	0.00	5.7%	5.0%	0.00	0.1%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.4%	0.00	1.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other in District (Zone 4/5)	0.1%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	2.3%	2.0%	0.00	0.0%	0.0%	0.00	0.6%	0.5%	0.00	0.1%	0.0%	0.00	0.0%	0.00	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Outside Total	77.2%	71.0%	-0.07	63.5%	57.5%	-0.40	36.2%	34.0%	-0.01	18.6%	16.5%	0.00	9.9%	8.0%	0.00	81.1%	61.8%	-0.08	10.9%	9.8%	0.00	56.3%	-0.03	36.0%	-0.03	0.00	0.00	0.00	0.00	0.00	0.00
Rest of study area (outside District)	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	1.1%	1.0%	0.00	0.0%	0.0%	0.00	0.4%	0.5%	0.00	0.0%	0.00	1.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Beaford	0.6%	0.0%	-0.01	14.0%	16.0%	0.12	48.0%	48.0%	0.00	44.0%	40.0%	-0.20	61.9%	62.0%	0.00	2.6%	3.6%	0.00	12.1%	13.3%	0.00	77.1%	-0.18	20.3%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Chertferry	11.0%	12.0%	0.01	6.2%	6.0%	-0.12	6.2%	6.0%	0.00	4.2%	4.0%	0.00	15.6%	16.0%	0.00	23.1%	23.5%	0.00	53.4%	53.5%	0.00	16.0%	-0.15	20.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clowar	0.8%	0.8%	0.00	0.3%	0.3%	0.00	0.3%	0.3%	0.00	0.3%	0.3%	0.00	0.1%	0.3%	0.00	1.9%	1.9%	0.00	13.3%	13.3%	0.00	0.7%	-0.01	3.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clunton / West End	1.1%	1.0%	0.00	1.7%	1.8%	0.01	1.2%	1.2%	0.00	1.2%	1.2%	0.00	1.7%	2.0%	0.00	0.5%	0.6%	0.00	1.0%	1.0%	0.00	1.7%	-0.02	3.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Healdings	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.2%	0.3%	0.00	0.0%	0.0%	0.00	0.1%	0.00	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Beaconsfield / West Lakeside	1.3%	1.8%	0.00	3.2%	4.8%	0.00	4.8%	4.8%	0.00	3.2%	3.2%	0.00	2.1%	3.0%	0.00	0.0%	0.0%	0.00	2.3%	2.3%	0.00	4.7%	-0.04	5.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Rye	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.3%	0.3%	0.00	0.1%	0.00	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Meltonmore	0.0%	1.0%	0.00	0.3%	0.3%	0.00	1.2%	1.2%	0.00	1.7%	1.8%	0.00	1.0%	1.0%	0.00	0.3%	0.3%	0.00	0.3%	0.3%	0.00	0.4%	0.00	1.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other	2.4%	3.0%	0.00	2.1%	3.0%	0.00	1.7%	1.8%	0.00	8.0%	8.0%	0.00	5.6%	5.9%	0.00	1.2%	1.3%	0.00	5.7%	5.8%	0.00	3.6%	-0.03	1.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Outside District/ Area Total	22.8%	30.0%	-0.03	62.5%	62.5%	-0.31	53.8%	55.0%	-0.02	36.1%	31.3%	0.00	38.1%	38.0%	-0.02	35.3%	36.3%	-0.02	88.1%	88.3%	-0.01	13.7%	-0.01	54.0%	-0.01	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	100.0%	100.0%	-0.10	100.0%	100.0%	-0.72	100.0%	100.0%	-0.03	100.0%	100.0%	0.00	100.0%	100.0%	-0.02	100.0%	100.0%	-0.02	100.0%	100.0%	-0.01	100.0%	-0.04	100.0%	-0.02	0.00	0.00	0.00	0.00	-0.06	

Notes:
 1. Existing market share taken from Table 5a
 2. Turnover of proposal taken from Table 2f
 3. Deviation to proposal based on proportional assumptions using the current existing shopping patterns and the nature of development proposed
 4. Resultant turnover = turnover pre-development minus trade diversion to proposal

Table 8: Trading Effects of Proposal (Convenience Goods)

Destination	Turnover Pre-Development (£m)					2021	2026 (£m)	Trade Diversion to Proposal				Turnover Post-Development (£m)					Impact			
	2021	2026	2031	2037	2042			(%)	2026 (£m)	2031 (£m)	2037 (£m)	2042 (£m)	2026	2031	2037	2042	2026	2031	2037	2042
Proposal												1.47	7.98	5.38	-6.28					
Zone 1 - Folkestone / Cheriton	180.69	182.57	186.86	193.63	199.29	26.7%	0.39	2.13	1.44	-2.19	182.18	184.73	192.19	201.48	-0.2%	-1.1%	-0.7%	1.1%		
Zone 2 - Hythe	70.63	70.99	72.21	73.81	75.06	62.3%	0.92	4.97	3.35	-5.11	70.07	67.24	70.46	80.17	-1.3%	-6.9%	-4.5%	6.8%		
Zone 3 - New Romney	30.22	30.49	31.12	31.97	32.71	2.1%	0.03	0.17	0.11	-0.17	30.46	30.96	31.86	32.88	-0.1%	-0.5%	-0.4%	0.5%		
Other in District (Zone 4/6)	17.36	17.64	18.13	18.80	19.34	2.1%	0.03	0.17	0.11	-0.17	17.61	17.96	18.69	19.51	-0.2%	-0.9%	-0.6%	0.9%		
District Total	236.90	231.68	236.32	246.21	256.40	93.2%	1.37	7.43	5.01	-7.65	236.31	236.88	246.20	256.75	-0.6%	-2.4%	-1.6%	2.3%		
Rest of study area (outside District)	2.81	2.85	2.93	3.03	3.09	0.1%	0.00	0.01	0.01	-0.01	2.85	2.92	3.03	3.10	-0.1%	-0.3%	-0.2%	0.3%		
Ashford	53.04	53.91	55.40	57.41	58.94	4.6%	0.07	0.37	0.25	-0.38	53.85	55.03	57.16	59.32	-0.1%	-0.7%	-0.4%	0.6%		
Canterbury	12.29	12.41	12.68	13.11	13.22	0.3%	0.00	0.03	0.02	-0.03	12.41	12.65	13.09	13.25	0.0%	-0.2%	-0.1%	0.2%		
Dover	15.97	16.14	16.50	17.06	17.27	0.8%	0.01	0.06	0.04	-0.06	16.13	16.44	17.02	17.34	-0.1%	-0.4%	-0.2%	0.4%		
Rye	7.48	7.61	7.79	8.05	8.30	0.1%	0.00	0.01	0.01	-0.01	7.78	8.06	8.31	8.51	-0.1%	-0.1%	-0.1%	0.1%		
Tenterden	2.54	2.58	2.64	2.73	2.80	0.5%	0.01	0.04	0.03	-0.04	2.57	2.60	2.71	2.84	-0.3%	-1.5%	-1.0%	1.4%		
Other	11.05	11.20	11.46	11.85	12.11	0.3%	0.01	0.03	0.02	-0.03	11.19	11.43	11.84	12.14	0.0%	-0.2%	-0.2%	0.2%		
Outside Study Area Total	105.19	106.70	109.40	113.26	115.74	6.8%	0.10	0.54	0.37	-0.56	106.60	108.86	112.99	116.29	-0.1%	-0.5%	-0.3%	0.5%		
TOTAL	404.68	408.38	417.72	431.47	442.13	100.0%	1.47	7.98	5.38	-8.21	408.38	417.72	431.47	442.14	0.0%	0.0%	0.0%	0.0%		

- Notes:
1. Turnover pre-development based on rolling forward current market share (Table 4a-c) against available expenditure (Table 3d)
 2. Trade diversion to proposal derived from Table 6
 3. Turnover post-development = turnover pre-development minus trade diversion to proposal
 4. Impact = change in turnover post-development expressed as a proportion of turnover pre-development
 5. Change in turnover = turnover post-development minus turnover pre-development in 2021

Table 9: Trading Effects of Proposal (Comparison Goods)

Destination	Turnover Pre-Development (£m)					2026 (%)	Trade Diversion to Proposal				Turnover Post-Development (£m)					Impact			
	2021	2026	2031	2037	2042		2026 (£m)	2031 (£m)	2037 (£m)	2041 (£m)	2026	2031	2037	2042	2026	2031	2037	2042	
Proposal																			
Zone 1 - Folkestone / Cheriton	251.13	288.26	333.57	402.67	472.14	43.8%	-0.42	3.51	-2.62	-6.88	288.68	330.07	405.29	479.02	0.1%	-1.1%	0.6%	1.5%	
Zone 2 - Hythe	23.22	26.53	30.55	36.49	42.38	11.8%	-0.11	0.95	-0.71	-1.86	26.65	29.60	37.19	44.24	0.4%	-3.1%	1.9%	4.4%	
Zone 3 - New Romney	9.90	11.34	13.10	15.69	18.31	0.4%	0.00	0.03	-0.02	-0.06	11.34	13.06	15.72	18.38	0.0%	-0.2%	0.2%	0.3%	
Other in District (Zone 4/6)	1.93	2.23	2.59	3.13	3.67	0.0%	0.00	0.00	0.00	-0.01	2.23	2.58	3.13	3.68	0.0%	-0.1%	0.1%	0.1%	
District Total	286.18	328.36	379.81	457.98	536.51	56.0%	-0.64	4.49	-3.35	-8.81	328.90	375.31	461.33	545.32	0.2%	-1.2%	0.7%	1.6%	
Rest of study area (outside District)	1.15	1.33	1.55	1.87	2.20	0.1%	0.00	0.00	0.00	-0.01	1.33	1.54	1.88	2.21	0.0%	-0.3%	0.2%	0.4%	
Ashford	116.37	134.05	155.46	187.48	219.47	17.2%	-0.17	1.38	-1.03	-2.70	134.21	154.08	188.50	222.17	0.1%	-0.9%	0.5%	1.2%	
Canterbury	94.26	108.30	125.37	151.27	175.92	16.1%	-0.15	1.29	-0.96	-2.53	108.46	124.08	152.24	178.45	0.1%	-1.0%	0.6%	1.4%	
Dover	12.40	14.22	16.45	19.85	22.91	0.7%	-0.01	0.06	-0.04	-0.12	14.23	16.39	19.89	23.03	0.1%	-0.4%	0.2%	0.5%	
Central London / West End	6.39	7.34	8.49	10.24	11.95	1.7%	-0.02	0.14	-0.10	-0.27	7.36	8.36	10.34	12.22	0.2%	-1.6%	1.0%	2.2%	
Hastings	6.66	7.70	8.93	10.76	12.66	0.1%	0.00	0.01	-0.01	-0.02	7.70	8.92	10.79	12.68	0.0%	-0.1%	0.1%	0.1%	
Bluewater / Intra Lakeside	9.38	10.76	12.44	14.96	17.45	4.7%	-0.04	0.37	-0.28	-0.73	10.80	12.06	15.24	18.18	0.4%	-3.0%	1.9%	4.2%	
Rye	3.48	4.02	4.65	5.62	6.59	0.1%	0.00	0.00	0.00	-0.01	4.02	4.65	5.62	6.60	0.0%	-0.1%	0.1%	0.1%	
Maidstone	3.89	4.48	5.19	6.27	7.35	0.4%	0.00	0.03	-0.02	-0.07	4.48	5.16	6.30	7.42	0.1%	-0.6%	0.4%	0.9%	
Other	18.09	20.83	24.13	29.15	34.06	2.9%	-0.03	0.24	-0.18	-0.46	20.85	23.90	29.33	34.52	0.1%	-1.0%	0.6%	1.4%	
Outside Study Area Total	272.07	313.02	362.66	437.49	510.56	44.0%	-0.42	3.52	-2.63	-6.91	313.44	369.14	440.12	517.47	0.1%	-1.0%	0.6%	1.4%	
TOTAL	558.24	641.38	742.47	895.47	1,047.07	100.0%	-0.96	8.02	-5.98	-15.71	641.38	742.47	895.47	1,047.07	0.0%	0.0%	0.0%	0.0%	

- Notes:
1. Turnover pre-development based on rolling forward current market share (Table 5a-e) against available expenditure (Table 3e)
 2. Trade diversion to proposal derived from Table 7
 3. Turnover post development = turnover pre development minus trade diversion to proposal
 4. Impact = change in turnover post development expressed as a proportion of turnover pre-development
 5. Change in turnover = turnover post development minus turnover pre-development in 2021

Table 10: Overall Trading Effects of Proposal (Convenience & Comparison Goods)

Destination	Turnover Pre-Development (€m)					Trade Diversion to Proposal				Turnover Post Development (€m)				Impact				Change in Turnover Post Development (€m)			
	2021	2026	2031	2037	2042	2026 (€m)	2031 (€m)	2037 (€m)	2042 (€m)	2026	2031	2037	2042	2026	2031	2037	2042	2021-2026	2021-2031	2021-2037	2021-2042
Proposal										0.51	15.99	-0.60	-23.92								
Zone 1 - Folkestone / Cheriton	431.82	470.83	520.43	596.30	671.43	-0.03	5.64	-1.18	-9.07	470.85	514.79	597.48	680.50	0.0%	-1.1%	0.2%	1.4%	39.04	82.98	165.66	248.68
Zone 2 - Hythe	93.85	97.52	102.76	110.29	117.44	0.80	5.92	2.64	-6.97	96.72	96.84	107.65	124.41	-0.8%	-5.8%	-2.4%	5.9%	2.87	-0.68	4.89	14.12
Zone 3 - New Romney	40.12	41.83	44.22	47.67	51.02	0.03	0.20	0.09	-0.23	41.80	44.02	47.58	51.26	-0.1%	-0.4%	-0.2%	0.5%	1.68	2.19	3.36	3.59
Other in District (Zone 4/6)	19.29	19.87	20.71	21.93	23.01	0.03	0.17	0.11	-0.18	19.84	20.54	21.82	23.19	-0.2%	-0.8%	-0.5%	0.8%	0.55	0.67	1.10	1.27
District Total	585.07	630.05	688.12	776.19	862.91	0.83	11.93	1.66	-16.45	629.21	676.20	774.53	879.36	-0.1%	-1.7%	-0.2%	1.9%	44.14	85.16	175.02	267.66
Rest of study area (outside District)	3.96	4.18	4.47	4.91	5.29	0.00	0.01	0.00	-0.02	4.18	4.46	4.90	5.31	0.0%	-0.3%	-0.1%	0.4%	0.22	0.28	0.43	0.40
Ashford	169.41	187.96	210.86	244.89	278.40	-0.10	1.75	-0.78	-3.08	188.06	209.11	245.67	281.49	0.1%	-0.8%	0.3%	1.1%	18.64	21.15	34.81	36.60
Canterbury	106.55	120.71	138.05	164.38	189.14	-0.15	1.32	-0.94	-2.55	120.86	136.74	165.33	191.70	0.1%	-1.0%	0.6%	1.3%	14.31	16.02	27.27	27.31
Dover	28.37	30.36	32.94	36.91	40.19	0.00	0.12	0.00	-0.18	30.36	32.82	36.91	40.37	0.0%	-0.4%	0.0%	0.4%	1.99	2.46	3.97	3.46
Rye	10.96	11.62	12.45	13.68	14.89	0.00	0.01	0.00	-0.02	11.62	12.43	13.68	14.91	0.0%	-0.1%	0.0%	0.1%	0.66	0.81	1.23	1.23
Tenterden	2.54	2.58	2.64	2.73	2.80	0.01	0.04	0.03	-0.04	2.57	2.60	2.71	2.84	-0.3%	-1.5%	-1.0%	1.4%	0.03	0.02	0.06	0.11
Other	55.46	62.30	70.65	83.26	95.58	-0.09	0.82	-0.57	-1.57	62.39	69.83	83.83	97.15	0.1%	-1.2%	0.7%	1.6%	6.93	7.53	13.18	13.90
Outside Study Area Total	377.25	419.72	472.06	550.75	626.29	-0.32	4.07	-2.26	-7.47	420.04	467.99	553.02	633.76	0.1%	-0.9%	0.4%	1.2%	42.79	48.27	80.95	83.01
TOTAL	962.33	1,049.76	1,160.19	1,326.94	1,489.21	0.51	15.99	-0.60	-23.92	1,049.76	1,160.19	1,326.94	1,489.21	0.0%	0.0%	0.0%	0.0%	86.93	133.43	255.97	350.66

Notes:
1. Taken from Table 8 and Table 9

AT 2020 PRICES



Document 3

Food and Beverage Impact Analysis

Table 1: Population and Expenditure Generated by New Settlement

Year	No. of Dwellings	Population	Average Expenditure per Capita (£ per sqm)	F&B Turnover (£m)
2021	0	0	1,553	0.00
2026	716	1,504	1,791	2.69
2031	2,968	6,233	1,911	11.91
2037	5,059	10,624	2,016	21.42
2042	8,500	17,850	2,109	37.64

Notes:

1. Population based on number of homes delivered and assuming an average household size of 2.1 occupants per household
2. Average expenditure per capita based on the average identified for the Study Area (Table 3b)
3. Turnover = population x expenditure per capita

At 2020 Prices

Table 2a: Potential Turnover of Proposed Food & Beverage Floorspace in 2026

	Gross Floorspace (sq m)	Sales Density (£ per sq m)	Turnover (£m)
Food & Beverage	600	4,000	2.40

Notes:

- Sales densities based on professional judgements informed by the nature of development
- Turnover = net floorspace x sales density

At 2020 Prices

Table 2b: Potential Turnover of Proposed Food & Beverage in 2031

	Gross Floorspace (sq m)	Sales Density (£ per sq m)	Turnover (£m)
Food & Beverage	2,700	4,101	11.07

Notes:

- Sales densities based on professional judgements informed by the nature of development, and allows for increase in turnover efficiency in line with the latest estimates provided by Experian (Retail Planner Briefing Note 18, October 2020)
- Turnover = net floorspace x sales density

At 2020 Prices

Table 2c: Potential Turnover of Proposed Food & Beverage in 2037

	Gross Floorspace (sq m)	Sales Density (£ per sq m)	Turnover (£m)
Food & Beverage	3,900	4,226	16.48

Notes:

- Sales densities based on professional judgements informed by the nature of development, and allows for increase in turnover efficiency in line with the latest estimates provided by Experian (Retail Planner Briefing Note 18, October 2020)
- Turnover = net floorspace x sales density

At 2020 Prices

Table 2d: Potential Turnover of Proposed Food & Beverage in 2042

	Gross Floorspace (sq m)	Sales Density (£ per sq m)	Turnover (£m)
Food & Beverage	4,200	4,332	18.20

Notes:

- Sales densities based on professional judgements informed by the nature of development, and allows for increase in turnover efficiency in line with the latest estimates provided by Experian (Retail Planner Briefing Note 18, October 2020)
- Turnover = net floorspace x sales density

At 2020 Prices

Table 2e: Proportion of Turnover Generated by Residential Development

	Total Spending Generated (£m)				Potential Retained Spending (%)	Potential Retained Spending (£m)				Turnover of Proposal from Non on-site Residents (£m)			
	2026	2031	2037	2042		2026	2031	2037	2042	2026	2031	2037	2042
Food & Beverage	2.69	11.91	21.42	37.64	70%	1.89	8.34	14.99	26.35	0.51	2.74	1.49	-8.15

Notes:

- Total Spending Generated taken from Table 1
- Proportion retained spending derived from Folkestone & Hythe Retail and Leisure Need Assessment 2018 Update (Amended June 2019)
- Turnover of Proposal taken from Table 2a-d
- Proportion of retained spending to turnover equates to turnover of proposal expressed as a proportion of retained spending

At 2020 Prices

Table 2f: Trade Draw of Proposal (2026)

	Zone 1	Zone 2	Zone 3	Study Area Zone 4	Zone 5	Zone 6	Zone 7	Sub-Total Study Area	Elsewhere	Total
Trade draw (%)	10.0%	75.0%	3.5%	0.5%	2.5%	5.0%	1.0%	97.5%	2.5%	100.0%
Food & Beverage										
Available Expenditure (£m)	86.93	36.79	28.17	23.58	28.28	29.72	36.08	269.55	-	-
Trade draw to Proposal (£m)	0.05	0.39	0.02	0.00	0.01	0.03	0.01	0.50	0.01	0.51
Resultant Market Share	0.1%	1.0%	0.1%	0.0%	0.0%	0.1%	0.0%	0.2%	-	-

Notes:

- Trade draw of proposal based on professional assumptions taking into account the nature of development and existing shopping patterns
- Available expenditure taken from Table 3b
- Turnover of Proposal taken from Table 2a-e
- Proportion of retained spending to turnover equates to turnover of proposal expressed as a proportion of retained spending

At 2020 Prices

Table 3a: Population within Study Area

	Zone 1	Zone 2	Zone 3	Survey Zone				TOTAL
				Zone 4	Zone 5	Zone 6	Zone 7	
2021	53,236	18,696	16,763	14,406	13,940	15,334	17,057	149,432
2026	55,055	19,190	17,239	15,007	14,618	15,993	17,632	154,734
2031	56,733	19,584	17,682	15,482	15,221	16,566	18,132	159,400
2037	58,847	19,879	18,063	16,000	15,848	17,162	18,717	164,516
2042	60,611	20,078	18,369	16,436	16,365	17,645	18,801	168,304

Notes:

1. Population derived from Experian Location Analyst (2020 estimates)

Table 3b: Expenditure per Capita (Food & Beverage)

	Zone 1	Zone 2	Zone 3	Survey Zone			
				Zone 4	Zone 5	Zone 6	Zone 7
2020	831	1,009	860	827	1,018	978	1,077
2021	1,369	1,662	1,416	1,362	1,677	1,611	1,774
2026	1,579	1,917	1,634	1,571	1,934	1,858	2,046
2031	1,684	2,045	1,743	1,676	2,063	1,982	2,183
2037	1,777	2,158	1,839	1,768	2,177	2,091	2,303
2042	1,858	2,257	1,923	1,850	2,277	2,187	2,409

Notes:

1. Expenditure per capita taken from Experian Location Analyst (January 2022) (2020 estimates)

2. Growth rates in line with the latest estimates published by Experian (Figure 1a, Experian Retail Planner Briefing Note 18, October 2020)

At 2020 Prices

Table 3c: Expenditure (Food & Beverage)

	Zone 1	Zone 2	Zone 3	Survey Zone				TOTAL
				Zone 4	Zone 5	Zone 6	Zone 7	
2021	72.86	31.07	23.74	19.62	23.37	24.70	30.26	225.62
2026	86.93	36.79	28.17	23.58	28.28	29.72	36.08	269.55
2031	95.54	40.04	30.82	25.95	31.40	32.83	39.57	296.16
2037	104.57	42.89	33.22	28.30	34.50	35.89	43.11	322.48
2042	112.64	45.31	35.33	30.40	37.26	38.59	45.29	344.81

Notes:

1. Expenditure = population (Table 3a) x expenditure per capita (Table 3b)

At 2020 Prices

Table 4a: Food & Beverage Patterns & Turnover by Zone (2021)

Table with columns: Destination, Available Expenditure, Zone 1, Zone 2, Zone 3, Survey Zone (Zone 4), Zone 5, Zone 6, Zone 7, Sub-total Survey Zones, Inflow, and Total Turnover (€m).

Table 4b: Food & Beverage Patterns & Turnover by Zone (2026)

Table with columns: Destination, Available Expenditure, Zone 1, Zone 2, Zone 3, Survey Zone (Zone 4), Zone 5, Zone 6, Zone 7, Sub-total Survey Zones, Inflow, and Total Turnover (€m).

Table 4c: Food & Beverage Patterns & Turnover by Zone (2031)

Table with columns: Destination, Available Expenditure, Zone 1, Zone 2, Zone 3, Survey Zone (Zone 4), Zone 5, Zone 6, Zone 7, Sub-total Survey Zones, Inflow, and Total Turnover (€m).

Table 4d: Food & Beverage Patterns & Turnover by Zone (2037)

Table with columns: Destination, Available Expenditure, Zone 1, Zone 2, Zone 3, Survey Zone (Zone 4), Zone 5, Zone 6, Zone 7, Sub-total Survey Zones, Inflow, and Total Turnover (€m).

Table 4e: Food & Beverage Patterns & Turnover by Zone (2042)

Table with columns: Destination, Available Expenditure, Zone 1, Zone 2, Zone 3, Survey Zone (Zone 4), Zone 5, Zone 6, Zone 7, Sub-total Survey Zones, Inflow, and Total Turnover (€m).

Notes: 1. Market shares derived from the Fokstons & Hyde Retail and Leisure Need (Appendix 3). 2. Turnover - retail spend & available expenditure by zone (Table 3c).

Table 5: Trade Draw of Proposal (Food & Beverage) (2026)

Development	Zone 1			Zone 2			Zone 3			Survey Zone			Zone 5			Zone 6			Zone 7			Sub-total Survey Zones				Elsewhere	TOTAL TURNOVER (\$M)			
	Existing Market Share	Decrease in Proposed (Gt)	Resultant Turnover (Zt)	Existing Market Share	Decrease in Proposed (Gt)	Resultant Turnover (Zt)	Existing Market Share	Decrease in Proposed (Gt)	Resultant Turnover (Zt)	Existing Market Share	Decrease in Proposed (Gt)	Resultant Turnover (Zt)	Existing Market Share	Decrease in Proposed (Gt)	Resultant Turnover (Zt)	Existing Market Share	Decrease in Proposed (Gt)	Resultant Turnover (Zt)	Existing Market Share	Decrease in Proposed (Gt)	Resultant Turnover (Zt)	Market Share	Turnover (Zt)	Decrease in Proposed (Gt)	Resultant Turnover (Zt)					
Available Expenditure			0.0			0.33			0.52			0.00			0.21			0.12			0.61			0.20			0.12			0.51
Zone 1 - Fifehouse / Clontarf	74.5%	74.5%	0.04	10.0%	11.0%	0.04	12.3%	12.0%	0.00	4.3%	4.3%	0.00	3.1%	3.0%	0.00	42.4%	42.0%	0.01	4.8%	4.8%	0.00	16.0%	0.00		4.8%	4.8%	0.00	16.0%	0.00	0.18
Zone 2 - Hyde	6.0%	6.0%	0.00	66.5%	66.5%	0.26	13.8%	13.8%	0.00	2.8%	2.8%	0.00	5.0%	5.0%	0.00	12.1%	12.0%	0.00	1.9%	2.0%	0.00	1.9%	2.0%	0.00	53.1%	0.27		25.0%	0.00	0.27
Zone 3 - New Romney	0.3%	0.0%	0.00	0.0%	0.0%	0.00	38.6%	38.5%	0.01	13.3%	13.3%	0.00	0.0%	1.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.3%	0.0%	0.00	1.8%	0.01		5.0%	0.00	0.01
Other in District (Zone 4/5)	2.3%	2.5%	0.00	2.5%	2.5%	0.01	8.7%	8.5%	0.00	10.3%	10.3%	0.00	27.8%	27.8%	0.00	21.8%	21.8%	0.01	15.1%	15.0%	0.00	15.1%	15.0%	0.00	4.8%	0.02		11.5%	0.00	0.02
Outside Total	85.1%	83.0%	0.04	80.0%	80.0%	0.31	73.6%	73.3%	0.01	30.7%	30.5%	0.00	37.4%	37.3%	0.00	76.3%	76.3%	0.00	30.1%	32.8%	0.06	77.0%	0.30		76.0%	0.44	0.40			
Alford	5.6%	5.5%	0.00	5.4%	5.5%	0.02	16.1%	16.0%	0.00	24.8%	24.8%	0.00	41.8%	41.8%	0.01	2.7%	2.8%	0.00	6.8%	6.8%	0.00	6.8%	6.8%	0.00	6.8%	0.00		6.8%	0.00	0.00
Cherrybury	6.4%	6.0%	0.00	7.8%	8.0%	0.03	1.1%	1.0%	0.00	2.2%	2.2%	0.00	6.3%	6.2%	0.00	18.8%	18.8%	0.00	42.3%	42.3%	0.00	8.2%	8.2%	0.00	10.0%	10.0%	0.00	8.2%	0.00	0.00
Fife	0.0%	0.0%	0.00	0.3%	0.3%	0.00	21.9%	21.9%	0.00	2.2%	2.2%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	2.7%	2.8%	0.00	2.7%	2.8%	0.00	0.0%	0.00		0.0%	0.00	0.00
Fifehouse	0.0%	0.0%	0.00	1.8%	1.8%	0.00	0.4%	0.3%	0.00	0.0%	0.0%	0.00	6.0%	5.9%	0.00	7.0%	6.9%	0.00	0.0%	0.0%	0.00	3.0%	3.0%	0.00	3.7%	0.01		2.0%	0.00	0.01
Hyde	1.0%	1.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	2.8%	2.8%	0.00	3.9%	3.9%	0.00	19.0%	0.00		6.8%	0.00	0.00			
Hywings	0.0%	0.0%	0.00	0.0%	0.0%	0.00	1.3%	1.3%	0.00	4.2%	4.3%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.0%	0.00	0.0%	0.00	0.00			
Other	4.4%	4.0%	0.00	4.2%	4.0%	0.02	2.3%	2.3%	0.00	5.8%	5.8%	0.00	5.4%	5.3%	0.00	2.6%	2.8%	0.00	15.0%	15.0%	0.00	15.0%	15.0%	0.00	4.1%	0.02		5.0%	0.00	0.02
Outside Mixed Area Total	16.5%	17.6%	0.01	30.1%	30.0%	0.06	24.8%	24.8%	0.00	66.3%	66.3%	0.01	22.3%	22.3%	0.01	64.0%	64.0%	0.00	77.6%	78.0%	0.00	22.1%	0.11		76.0%	0.25	0.11			
TOTAL	100.0%	100.0%	0.05	100.0%	100.0%	0.39	100.0%	100.0%	0.02	100.0%	100.0%	0.00	100.0%	100.0%	0.01	100.0%	100.0%	0.00	100.0%	102.9%	0.01	100.0%	0.30		100.0%	0.41	0.51			

Notes:
1. Existing market shares taken from Table 4a
2. Turnover of proposal taken from Table 5f
3. Direction to proposal based on professional assumptions taking into account existing food & beverage patterns and the nature of development proposed
4. Resultant turnover = turnover pre development minus trade diversion to proposal

Table 6: Trading Effects of Proposal (Food & Beverage)

Destination	Turnover Pre-Development (£m)					Trade Diversion to Proposal					Turnover Post-Development (£m)				Impact				Change in Turnover Post-Development (£m)				
	2021	2026	2031	2037	2042	(%)	2026 (£m)	2031 (£m)	2037 (£m)	2042 (£m)	2026	2031	2037	2042	2026	2031	2037	2042	2021-2026	2021-2031	2021-2037	2021-2042	
Proposal:											9.41	9.74	9.44	9.16									
Zone 1 - Fokstone / Chertton	81.49	97.31	106.97	116.87	125.62	19.0%	0.10	0.52	0.28	-1.55	97.21	106.45	116.58	127.17	-0.1%	-0.5%	-0.2%	1.2%	15.72	24.96	35.09	45.88	
Zone 2 - Hythe	37.10	44.10	48.21	52.00	55.25	52.6%	0.27	1.44	0.78	-4.29	43.83	46.77	51.21	59.54	-0.6%	-3.0%	-1.5%	7.8%	6.73	9.66	14.11	22.44	
Zone 3 - New Romney	13.52	16.10	17.64	19.07	20.34	1.6%	0.01	0.04	0.02	-0.13	16.09	17.59	19.05	20.47	-0.1%	-0.2%	-0.1%	0.6%	2.56	4.07	5.53	6.94	
Other in District (Zone 4/6)	25.29	30.35	33.46	36.53	39.09	4.7%	0.02	0.13	0.07	-0.38	30.32	33.33	36.46	39.47	-0.1%	-0.4%	-0.2%	1.0%	5.03	8.04	11.17	14.18	
District Total	197.41	187.85	196.27	224.46	240.30	77.9%	0.40	2.13	1.16	-6.35	187.46	204.14	223.31	246.65	-0.2%	-1.0%	-0.5%	2.0%	30.04	46.73	65.90	84.25	
Road of study area (outside District)	26.94	32.31	35.61	38.86	41.68	6.7%	0.03	0.18	0.10	-0.54	32.28	35.43	38.76	42.22	-0.1%	-0.5%	-0.3%	1.3%	5.34	8.49	11.82	15.28	
Ashford	25.17	30.07	33.03	35.99	38.20	8.2%	0.04	0.22	0.12	-0.67	30.03	32.81	35.87	38.87	-0.1%	-0.7%	-0.3%	1.8%	4.88	7.83	10.69	13.69	
Canterbury	8.28	9.93	10.93	11.91	12.76	0.8%	0.00	0.02	0.01	-0.05	9.93	10.91	11.90	12.80	0.0%	-0.1%	-0.1%	0.4%	1.65	2.63	3.62	4.63	
Dover	3.12	3.75	4.13	4.49	4.81	1.7%	0.01	0.05	0.02	-0.14	3.74	4.08	4.47	4.95	-0.2%	-1.1%	-0.6%	2.8%	0.81	0.96	1.34	1.82	
Rye	4.97	5.93	6.51	7.10	7.53	0.8%	0.00	0.02	0.01	-0.07	5.92	6.49	7.09	7.59	-0.3%	-0.3%	-0.2%	0.9%	0.98	1.52	2.12	2.63	
Tunbridge	1.13	1.36	1.48	1.62	1.74	0.1%	0.00	0.00	-0.01	1.38	1.49	1.62	1.74	1.74	0.0%	-0.1%	-0.1%	0.4%	0.22	0.36	0.49	0.61	
Other	12.91	15.42	16.94	18.46	19.65	4.1%	0.02	0.11	0.06	-0.34	15.40	16.83	18.40	19.99	-0.1%	-0.7%	-0.3%	1.7%	2.49	3.92	5.49	7.08	
Outside Study Area Total	93.83	98.77	108.64	118.92	126.38	32.2%	0.11	0.68	0.33	-7.80	98.86	108.04	118.10	128.16	-0.1%	-0.8%	-0.3%	1.4%	16.13	24.91	34.87	46.83	
TOTAL	239.93	286.63	314.91	342.89	366.66	100.0%	0.51	2.74	1.49	-6.15	286.63	314.91	342.89	366.66	0.0%	0.0%	0.0%	0.0%	46.18	72.24	101.47	134.88	

Notes:
 1. Turnover pre-development based on rolling forward current market share (Table 4a-e) against available expenditure (Table 2a)
 2. Trade diversion to proposal derived from Table 5
 3. Turnover post-development = turnover pre-development minus trade diversion to proposal
 4. Impact = change in turnover post-development expressed as a proportion of turnover pre-development
 5. Change in turnover = turnover post-development minus turnover pre-development in 2021



Document 4

Overall Retail / Food and Beverage Impact

Table 1: Overall Trading Effects of Proposal (Retail & F&B)

Destination	Turnover Pre-Development (€m)					Trade Diversion to Proposal				Turnover Post Development (€m)				Impact				Change in Turnover Post Development (€m)			
	2021	2026	2031	2037	2042	2026 (€m)	2031 (€m)	2037 (€m)	2042 (€m)	2026	2031	2037	2042	2026	2031	2037	2042	2021-2026	2021-2031	2021-2037	2021-2042
Proposal										0.42	15.96	-3.23	-36.15								
Zone 1 - Folkestone / Cheriton	513.31	568.13	627.40	713.17	797.05	0.07	6.16	-0.90	-10.62	568.06	621.24	714.06	807.68	0.0%	-1.0%	0.1%	1.3%	54.75	107.93	200.76	294.37
Zone 2 - Hythe	130.95	141.62	150.97	162.29	172.70	1.07	7.36	3.42	-11.26	140.55	143.61	158.87	183.95	-0.8%	-4.9%	-2.1%	6.5%	9.60	1.98	7.90	21.66
Zone 3 - New Romney	53.64	57.92	61.86	66.74	71.36	0.03	0.24	0.11	-0.36	57.89	61.61	66.63	71.72	-0.1%	-0.4%	-0.2%	0.5%	4.25	3.69	4.77	4.98
Other in District (Zone 4/6)	44.58	50.22	54.17	58.45	62.11	0.05	0.30	0.18	-0.56	50.16	53.87	58.27	62.67	-0.1%	-0.6%	-0.3%	0.9%	5.58	3.65	4.10	4.21
District Total	742.48	817.90	894.39	1,000.65	1,103.22	1.23	14.06	2.82	-22.80	816.67	880.33	997.83	1,126.02	-0.2%	-1.6%	-0.3%	2.1%	74.19	117.26	217.53	325.23
Rest of study area (outside District)	30.90	36.49	40.08	43.77	46.96	0.04	0.20	0.10	-0.56	36.46	39.89	43.67	47.53	-0.1%	-0.5%	-0.2%	1.2%	5.56	3.40	3.58	3.76
Ashford	194.59	218.03	243.89	280.87	316.60	-0.06	1.97	-0.66	-3.75	218.09	241.91	281.53	320.35	0.0%	-0.8%	0.2%	1.2%	23.50	23.88	37.64	39.48
Canterbury	114.83	130.65	148.98	176.29	201.90	-0.15	1.33	-0.93	-2.60	130.80	147.65	177.23	204.50	0.1%	-0.9%	0.5%	1.3%	15.97	17.00	28.25	28.21
Dover	31.49	34.11	37.07	41.40	45.00	0.01	0.17	0.02	-0.31	34.09	36.91	41.38	45.31	0.0%	-0.4%	-0.1%	0.7%	2.60	2.80	4.31	3.91
Rye	15.93	17.55	18.96	20.78	22.41	0.01	0.04	0.02	-0.08	17.55	18.92	20.76	22.50	0.0%	-0.2%	-0.1%	0.4%	1.62	1.37	1.81	1.72
Tenterden	3.68	3.94	4.13	4.35	4.54	0.01	0.04	0.03	-0.05	3.93	4.09	4.32	4.59	-0.2%	-1.0%	-0.6%	1.0%	0.25	0.15	0.19	0.23
Other	68.37	77.72	87.59	101.72	115.23	-0.07	0.93	-0.51	-1.91	77.79	86.66	102.22	117.14	0.1%	-1.1%	0.5%	1.7%	9.42	8.94	14.64	15.42
Outside Study Area Total	459.78	518.49	580.70	669.16	752.65	-0.21	4.67	-1.93	-9.27	518.70	576.03	671.11	761.92	0.0%	-0.8%	0.3%	1.2%	58.92	57.54	90.41	92.74
TOTAL	1,202.26	1,336.39	1,475.09	1,669.83	1,855.86	1.02	18.73	0.89	-32.07	1,335.79	1,472.32	1,665.71	1,851.78	0.0%	-0.2%	-0.2%	-0.2%	133.10	174.80	307.94	417.96

Notes:
1. Taken from Table 10 at Document 2 and Table 6 at Document 3

AT 2020 PRICES



Document 5

Retail Impact Methodology Note



Note

Retail Methodology (January 2022)

1 Scope & Purpose

- 1.1 In the interests of clarity, we have assessed the trading effects of the proposal following a standard and recognised methodology, which is summarised below.

2 Study Area

- 2.1 The Study Area is defined based on that identified for the Folkestone & Hythe Retail and Leisure Need Assessment (RLNA) (June 2019 update) undertaken on behalf of Folkestone and Hythe District Council (F&HDC).

3 Base and Assessment Years

- 3.1 A base year of 2021 has been applied, with assessment years of 2026, 2031, 2037 and 2042 (the anticipated year of completion of all the commercial floorspace proposed).
- 3.2 All monetary values are expressed at 2020 prices.

4 Population and Expenditure

- 4.1 Population forecasts and expenditure per person expenditure for each zone that comprises the Study Area has been derived from Experian Location Analyst (2020 estimates). This represents the most up-to-date population and expenditure estimates available and supersede those utilised in the RLNA – also derived from Experian.
- 4.2 In terms of future growth in retail expenditure, the latest estimate provided by Experian adjusted for Special Forms of Trading (Figure 6 of Appendix 3 to Experian Retail Planner Briefing Note 18, October 2020) for the period 2020 to 2040.
- 4.3 Post 2040, the latest Experian evidence does not provide growth rates, as such the forecast growth rate of +2.7% per annum and 0.0% per annum for comparison goods and convenience goods respectively identified for 2039-2040 has been applied for this period.
- 4.4 Accordingly, the following retail expenditure growth rates have been applied:

	<u>Comparison Goods</u>	<u>Convenience Goods</u>
▪ 2020-2021:	+8.1%	-5.3%
▪ 2021-2022:	+2.9%	+0.2%
▪ 2022-2023:	+2.7%	-0.3%
▪ 2023-2024:	+2.0%	-0.2%
▪ 2024-2025:	+1.9%	-0.1%
▪ 2025-2026:	+2.0%	-0.2%
▪ 2026-2027:	+2.1%	-0.2%



Note continued

▪ 2027-2028:	+2.3%	-0.1%
▪ 2028-2029:	+2.4%	-0.1%
▪ 2029-2030:	+2.5%	-0.2%
▪ 2030-2031:	+2.5%	-0.1%
▪ 2031-2032:	+2.5%	0.0%
▪ 2032-2033:	+2.6%	0.0%
▪ 2033-2034:	+2.6%	0.0%
▪ 2034-2035:	+2.7%	+0.1%
▪ 2035-2036:	+2.7%	0.0%
▪ 2036-2037:	+2.7%	0.0%
▪ 2037-2038:	+2.8%	0.1%
▪ 2038-2039:	+2.7%	0.1%
▪ 2039-2040:	+2.7%	0.0%
▪ 2040-2041:	+2.7%	0.0%
▪ 2041-2042:	+2.7%	0.0%

- 4.5 An allowance for the influence of Special Forms of Trading (such as online shopping) has also been made for 2020 based on the deduction identified by Experian of 22.9% for comparison goods and 6.3% for convenience goods (Figure 5 of Appendix 3 to Experian Retail Planner Briefing Note 18, October 2020, 'Adjusted for SFT sales from stores').
- 4.6 With regard to 'food and beverage' expenditure, again this has been derived from Experian (2020 estimates). In terms of future expenditure growth the long-term growth estimates identified by Experian (Figure 1a, Retail Planner Briefing Note 18, October 2020) of +0.9% per annum over the period to 2042.
- 4.7 Market shares, derived from the RLNA, have been utilised against the updated expenditure levels generated on a zone-by-zone basis within the Study Area.