



# THE GOODSYARD

Retail Assessment

September 2019



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## **PREFACE**

This is a Retail Assessment prepared by Urban Shape.

It is submitted in relation to amendments ("Proposed Amendments") that are being made to the planning applications and applications for listed building consent (the "Applications") for the redevelopment of Bishopsgate Goodsyrd. The Applications as amended by the Proposed Amendments form the "Revised Scheme".

On 21st July 2014 Bishopsgate Goodsyrd Regeneration Limited (the "Applicant") submitted the Applications to the London Borough of Hackney and the London Borough of Tower Hamlets (the "Boroughs").

On 23rd September 2015 the then Mayor of London directed that he would act as local planning authority for the purposes of determining the Applications.

On 12th April 2016 the then Mayor deferred the determination of the Applications to allow the Applicant to address the issues raised in the Stage III Report.

The Applicant has carefully reviewed the issues raised in the Stage III Report and has liaised closely with the Mayor of London, the Boroughs and other stakeholders and consultees and is now submitting amendments to the Applications to address their feedback.

In broad terms, the Applicant is making the following Proposed Amendments to the Applications:

### **Plot 1 (Formerly Plots A and B)**

The Proposed Amendments maintain the height of the building and the type of uses, as currently proposed and retains the bridging over the East London Line box. The building massing is proposed to be revised to include setbacks at the upper levels as a result of feedback from the GLA and the Boroughs to address the relationship with adjacent buildings.

### **Plot 2 (Formerly Plots F and G)**

The Proposed Amendments replace the two tallest residential buildings with a commercial building with retail at the ground floor. The building would extend up to 17 - 29 storeys and would be the tallest building proposed. This building is being submitted with all matters in detail.

The reduction in height of Plot 2 means that no part of the scheme is now visible in views from the South Bastion of Tower Bridge.

### **Plot 3 (Formerly Plot K)**

The Proposed Amendments maintain the height and footprint of the building and the type of uses, as currently proposed. The Proposed Amendments address design comments in respect of the treatment to Phoenix Street and the listed Oriel Wall along Commercial Street.

### **Plot 4 (Formerly Plot C)**

The Proposed Amendments maintain the uses within this building and comprise retail at ground floor with residential above. The height of the building is proposed to be reduced to 19 storeys.

### **Plot 5 (Formerly Plot D)**

The Proposed Amendments maintain the uses within this building and comprise retail at ground floor with residential above. The height of the building is proposed to be reduced to between 6 -13 storeys.

### **Plot 6 (Formerly Plot E)**

The Proposed Amendments change the use of this building to a cultural type use with retail use. The height of the building is proposed to be reduced to up to 5 storeys in order to address comments raised by the GLA in respect of daylight and sunlight impacts along Sclater Street and the massing in the north-east part of the site.

### **Plots 7, (Formerly Plots H, I, J), 8A, 8B, 8C, 10 and 11 (the Pavilion)**

The Proposed Amendments maintain the mix of retail uses within the Oriel as well as the potential for Class D1/D2 uses within the Braithwaite arches with public open space above, as currently proposed (Plot 7). Plot 8 introduces hotel and residential

uses with access at ground floor level within a 25 storey building to the west of Braithwaite Street, plus 4 storey pavilion buildings on top of the existing arches. The Proposed Amendments introduce residential within Plot 10 with retail at ground floor. The Proposed Amendments introduce retail use within a single storey building in Plot 11.

### **Public Open Space**

The overall amount of public space as part of the Proposed Amendments would increase at platform level, including an area of consolidated open space at the eastern end of the platform.

The Proposed Amendments, and the rationale for them, are explained fully in the Planning Statement prepared by DP9 Ltd.

The Proposed Amendments to the Applications have required some changes to be made to the Retail Assessment and other documentation originally submitted with the Applications.

Rather than issuing tracked changed documents, the Applicant has issued this revised Retail Assessment which replaces in its entirety that submitted previously.

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Appendix 1      Household Telephone Survey Area

Appendix 2      2015 Retail Impact Assessment

# THE GOODSYARD

## 1.0 INTRODUCTION

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## 1.1 INTRODUCTION

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References in this document to ‘application’ should be taken to read ‘applications’ reflecting the fact that two identical planning applications have been submitted – one to LB Hackney and one to LB Tower Hamlets. Each Borough will determine whether consent should be granted for the extent of the Proposed Development that falls within its respective area. Therefore, references to ‘planning permission’ should be taken to read ‘planning permissions’ given that two planning permissions will be required for the Proposed Development to proceed in its entirety.

- 1.1.1 This Retail Assessment has been prepared by Urban Shape planning consultants on behalf of Bishopsgate Goodsyards Regeneration Ltd (hereafter referred to as ‘the Applicant’). It forms part of a suite of documents accompanying the application for planning permission at The Goodsyards (the ‘development site’).
- 1.1.2 The site falls partly within the London Borough of Tower Hamlets (LBTH) and partly within the London Borough of Hackney (LBH). Each borough is to determine the application for the part of the site within its jurisdiction.

### 1.1.3 Background

- 1.1.3.1 Planning applications for the comprehensive redevelopment of the Goodsyards site were submitted to the London Boroughs of Hackney (LBH) and Tower Hamlets (LBTH) in 2014 (Ref: 2014/2425 and PA/14/02011). In September 2015, the Mayor of London informed LBH and LBTH that he would act as the local planning authority for the purposes of determining the application. Following consideration of the proposals, he subsequently (April 2016) agreed to defer determination in order to allow time to amend the application to address outstanding concerns.
- 1.1.3.2 The most recent Retail Assessment in support of redevelopment proposals at The Goodsyards was prepared by DP9 in 2015. In response to amendments to the original 2014 planning application, the 2015 report formed a revised Retail Assessment in order to demonstrate the role and function of the retail offer proposed at the Goodsyards. The 2015 Retail Assessment identified that the application site is located within the Central Activities Zone (CAZ), that the London Plan supports the CAZ as a focus for retail development, and that development proposals were in accordance with existing and emerging development plans in both LBH and LBTH.
- 1.1.3.3 Nevertheless, in the context of pre-application discussions, the 2015 Retail Assessment presented a full and robust sequential site and retail impact assessment. In parallel with the ‘Leasing Strategy’ prepared by Shackletons, the outputs provided certainty that the proposals would not compete with nearby retail provision/town centres but would instead deliver a complementary offer.
- 1.1.3.4 The Mayor, in his Representation Hearing Report (The Stage 3 Report, 8th April 2016), did not raise the level and type of retail and leisure floorspace being proposed as a contentious issue or a reason for refusal. The Stage 3 Report did not disagree with the findings of the 2015 Assessment which concluded that there were no alternative sequentially preferable sites, and that there would be no significant adverse impacts arising on existing centres or future investment as a result of the development proposals. There was no suggestion that the retail and leisure floorspace being proposed was anything other than in full compliance with policy.

### 1.1.4 The Amended Scheme

- 1.1.4.1 This Retail Assessment is submitted to support amendments that are being made to the 2014 planning application. It has been prepared to demonstrate the role and function of the retail offer proposed at The Goodsyards, taking into consideration relevant provisions of the statutory development plan and other material planning guidance.
- 1.1.4.2 A full description of the amended scheme is provided in the revised Development Specification and the revised Planning Statement. The 2019 Retail Assessment specifically assesses the impact of the proposals to provide up to 19,547 sq m (GEA) A1, A2, A3 and A5 retail floorspace on The Goodsyards site - representing a small reduction from that previously proposed. The Assessment is structured as follows:
- Section 2 provides a brief review of the site location, the development proposals and the proposed retail offer;
  - Section 3 summarises the relevant retail planning policies;
  - Section 4 provides a qualitative review of the health of nearby and competing centres;
  - Section 5 considers whether there are any sequentially preferable sites that are suitable and available to accommodate the proposal;
  - Section 6 assesses the impact of the proposal against the relevant retail impact tests;
  - Section 7 assesses the impact of the proposed A2, A3 and A5 floorspace; and
  - Section 8 sets out a summary and conclusions.

# THE GOODSYARD

## 2.0 THE SITE & APPLICATION PROPOSALS



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## 1.2 THE SITE AND DEVELOPMENT PROPOSALS

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### 1.2.1 The Site

#### 1.2.1.1 Site Description

- 1.2.1.1.1 The site is approximately 4.4 ha and is centred at Ordnance Survey (OS) National Grid Reference (NGR) TQ 33618 82233. The site has been in a derelict state since a fire in December 1964 and demolition of buildings on-site in 2004. In 2010 the Shoreditch High Street Rail Station opened in the centre of the site, serving the East London Line (London Overground) between Highbury & Islington and several stations south of the River Thames.
- 1.2.1.1.2 The site is bounded by transportation infrastructure in the form of road and rail. The site is bounded by the A1209 Bethnal Green Road and Sclater Street to the north, Brick Lane to the east and the A10 Shoreditch High Street to the west. The Great Eastern Main Line and West Anglia Main Line railways from Liverpool Street station form most of the southern boundary of the site, with the A1202 Commercial Street to the southwest. Wheeler Street / Braithwaite Street run north/south through the centre of the site. Aside from the Shoreditch High Street Rail Station building and associated elevated London Overground rail line, there are currently no other permanent buildings on the site. As of December 2011, there are several temporary 'recycled metal shipping containers' used as a pop-up retail hub known as the 'Boxpark'.
- 1.2.1.1.3 Through the centre of the site in a west/east orientation are multiple games pitches, including eight 'five-a-side' football pitches operated by Powerleague Fives Ltd. The southern section of the site including the listed arches and viaduct is vacant and overgrown with scrub-like vegetation and several low value trees.
- 1.2.1.1.4 The site falls within the Central Activities Zone (CAZ), an area in London with a distinctive variety of functions including large concentrations of commercial, retail, leisure and cultural uses. In the Draft London Plan, Shoreditch is identified as a 'Retail Cluster', a designation which now sits within the identified London-wide town centre retail hierarchy (Annex 1). In addition, the site is also allocated for comprehensive redevelopment in both the LBTH and LBH development plan documents, including the provision of retail and leisure uses.

#### 1.2.1.2 Surrounding Area

- 1.2.1.2.1 The site falls within the most southern part of Hackney, South Shoreditch. The South Shoreditch area provides a mix of uses including commercial, light industrial, retail, entertainment and residential uses. To the north of the site there are converted warehouse buildings which provide a mix of office, design studio, restaurant and bar uses.
- 1.2.1.2.2 The designated Brick Lane district centre bounds the east of the site. Brick Lane district centre is a vibrant shopping street which provides a range of independent shops and restaurants, and is a hub for the Bangladeshi community, as well as being a visitor destination. Careful consideration has been made to ensure that the function of the development proposals provide a complementary function to existing centres such as Brick Lane.
- 1.2.1.2.3 Spitalfields Market is located to the south of the site and provides a retail and leisure offer which serves both workers and residents during the week, but also attracts a high proportion of visitors and tourists during the weekend. Further to the south and east of the site there are a mix of commercial uses including large floorplate office buildings and ancillary shops and services, which reflect the nature of the CAZ.

### 1.2.2 The Amended Scheme

- 1.2.2.1 This section sets out a description of the retail development proposals which are being considered as part of this Retail Assessment. Full details of the scheme are set out in the revised Development Specification and revised Planning Statement.

#### 1.2.2.2 Proposed concept and retail offer

- 1.2.2.2.1 The location of The Goodsyards provides an opportunity to create a retail and leisure link route between the visitors shopping at Spitalfields to the south of the site, then northwards along Brick Lane, and westwards to The Goodsyards. The proposals will create a retail hub which will complement the surrounding existing retail and leisure uses within the retail link route, as well as serving visitors to the north and west of the site as part of future development sites, for example at Shoreditch Village and the Stage, which will also become visitor attractors.
- 1.2.2.2.2 The retail hub will attract an eclectic mix of independent retailers and restaurants that will serve both local residents and office workers, as well as attracting London residents from a wider area and tourists.
- 1.2.2.2.3 The proposed retail floorspace provides a mix of units sizes up to 1,000 sq m, including 45% of the units being less than 80 sq m thereby providing the opportunity to let a significant proportion of the development to local, independent or start-up occupiers. Only 4% of the units will be over 500 sq m, and not, therefore, dominated by large global brands. The composition of the scheme will be comparable to locations across London such as Carnaby Street, Covent Garden, Seven Dials and Kings Cross.

- 1.2.2.2.4 The retail units will function as a shopping street, with the largest retail units provided outdoors in the west of the site, as well as a row of units running west/east underneath the high-level park. Smaller retail units will be provided along the northern and southern boundaries to the site.
- 1.2.2.2.5 There is an aspiration for the A3 and A5 retail leisure uses to primarily occupy edges of public squares to activate the frontage in these areas, all with dedicated outside seating. In addition, restaurants are proposed to be located on the upper level fronting the high-level park, which are intended to serve visitors to the park and also create activity.
- 1.2.2.3 Retail leasing strategy**
- 1.2.2.3.1 An up-to-date retail leasing strategy is being led by Shackleton following detailed analysis of retailer demand and previous public consultation feedback to secure a commercial and viable retail concept as part of The Goodsyard development proposals. The leasing strategy accompanies this planning application.
- 1.2.2.3.2 Shackleton have carefully constructed their retail leasing strategy to align the proposed retail mix with community aspirations for the site. As part of the strategy, successful local East London retailers who are looking to expand are being targeted as potential tenants, and the scheme will provide incubator retail units to local start up retailers to complement the existing retail offer surrounding the site.
- 1.2.2.3.3 Public consultation identified that the proposed target retailers should not be a replica of typical retail units and restaurants found on Brick Lane, but there should be a focus on local and independent shops as well as speciality shops. By adopting this principle, this will ensure that the target market at The Goodsyard is not competing with existing retailers at Brick Lane.
- 1.2.2.3.4 The proposed retail unit mix provides a variety of unit sizes, and small units on flexible lease terms will be made available to support start up retailers and ensure that new locally grown retailers already in the area have the opportunity to grow into larger premises.
- 1.2.2.3.5 Shackleton anticipate that the site will provide a combination of retail shops and food and beverage outlets targeted at a mix of local demand and the aspirational retail offer. Aspirational retailers are identified in the Leasing Strategy, with the proposed tenant mix being a combination of fashion, lifestyle, food and beverage and leisure retailers. The retail strategy proposes to provide units to accommodate identified demand from British aspirational retailers as well as overseas retailers seeking to debut in the UK.
- 1.2.2.4 Proposed retail function of The Goodsyard**
- 1.2.2.4.1 As a result of the carefully considered retail offer and leasing strategy the proposed retail function of the retail and leisure floorspace will ensure that the proposals do not compete with the existing retail provision, and provides a complementary role.
- 1.2.2.4.2 The commitment to supporting local start up retailers demonstrates that the proposed function of the retail units will provide a beneficial impact to local retailing. The proposed mix of independent and aspirational retailers will ensure that the retail offer at The Goodsyard is diverse and has an East London 'buzz'.
- 1.2.2.4.3 The retail and leisure offer at the Goodsyard will cater to a wide variety of catchment areas including existing local residents, new residents at The Goodsyard, the weekday office workers and the visitors from wider London and tourists from the UK and abroad.
- 1.2.2.5 Proposed retail floorspace**
- 1.2.2.5.1 The Amended Scheme comprises a mixed-use development with retail uses provided at ground and first floor level. In total the scheme comprises up to a maximum of 19,547 m<sup>2</sup> GEA for retail uses (Use Class A1/2/3/5).
- 1.2.2.5.2 For the purposes of the Amended Scheme we have tested the impact of the maximum amount of retail floorspace proposed in order to assess the theoretical worst case scenario in impact terms. In this scenario, it is assumed that the maximum amount of retail floorspace is let and trading at a high sales density. In practice, however, the small incubators and start up retail units would not trade at the higher levels reached by the more aspirational retailers; and it should also be noted that the final development might not reach the maximum levels identified. The scenario tested is the worst-case impact scenario.
- 1.2.2.5.3 The majority of the retail floorspace proposed is in plots which fall within the jurisdiction of LBTH (up to 14,677 m<sup>2</sup> A1, A2, A3 and A5 GEA retail), whilst a smaller proportion of retail floorspace is proposed within LBH (up to 4,870 m<sup>2</sup> GEA).
- 1.2.2.5.4 At this stage it is not yet known what proportion of the proposed retail floorspace will be used for different A1, A2, A3 or A5 uses. The Applicant is seeking a flexible planning consent in order to adapt to changing market demand and retail trends. However, it is envisaged that the scheme will be a predominantly comparison goods led shopping destination. The amended scheme does not include a convenience foodstore, and this type of floorspace has not, therefore, been tested within this Retail Assessment.

- 1.2.2.5.5 We envisage that the proposed retail floorspace will be of a sufficient critical mass and of an appropriate retail offer to attract a high proportion of visitors, tourists and workers, which are not local to the Shoreditch area. Accordingly, we have assumed that the proposed floorspace will attract a reasonably high proportion of inflow from outside the survey area (Appendix 1) (as discussed in more detail in Section 6 of this report).
- 1.2.2.5.6 We have provided a conservative estimate that there will be an inflow of 40% from beyond the local study area for comparison goods. This has been informed by research undertaken for the New West End Company which identified that approximately 27% of visitors to the West End were visiting from Greater London and the South East of England, and 50% of visitors to the West End were tourists from the UK and abroad. This demonstrates the high proportion of tourist and visitor spend arising in retail destinations within the CAZ.
- 1.2.2.6 Proposed retail floorspace split**
- 1.2.2.6.1 A major convenience foodstore element will not form part of the scheme, and at this stage the exact proportion of comparison and leisure retail is not known. Therefore, for the purpose of this development we have tested a maximum comparison goods floorspace of 19,547 sq m GEA – more than is realistic given the required mix of uses, but less than that tested previously.
- 1.2.2.6.2 In addition, the assessment considers the potential impact of the proposed A2, A3 and A5 retail uses, which could come forward as part of the Amended Scheme (Section 7).

# THE GOODSYARD

## 3.0 PLANNING POLICY CONTEXT

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## 1.3 PLANNING POLICY CONTEXT

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1.3.1 The National Planning Policy Framework (NPPF) (2019) provides national planning guidance, and sets out a presumption in favour of sustainable development. The NPPF is a material consideration in the determination of planning applications. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended), the proposed development must be determined in accordance with the development plan unless material considerations indicate otherwise. In this section, we set out an assessment of the relevant retail policies within the development plan.

### 1.3.2 National Retail Planning Policies

#### 1.3.2.1 National Planning Policy Framework (2019)

1.3.2.1.1 The revised National Planning Policy Framework was updated on 19 February 2019 and sets out the Government's commitment to create jobs and prosperity. This revised Framework replaces the previous National Planning Policy Framework published in March 2012, and the revised July 2018 version.

1.3.2.1.2 The NPPF requires local planning authorities to adopt a positive approach to decision-taking, and to apply a presumption in favour of sustainable development. The NPPF requires that applications which accord with the development plan should be approved 'without delay'. In instances where there are no relevant development plan policies, or the policies (which are most important for determining the application) are out-of-date, the NPPF states that permission should be granted, unless the adverse impacts of doing so would significantly outweigh the benefits of the development, when assessed against the policies in the NPPF.

1.3.2.1.3 In terms of policies relating to retailing and town centres, the NPPF advocates a 'town centres first' approach, and requires local planning authorities' development plans to positively promote competitive town centre environments and manage the growth of centres over their development plan period.

1.3.2.1.4 Paragraph 86 of the NPPF (as revised) states that a sequential assessment is required for planning applications for 'main town centre uses' (which include retail) that are not in an existing centre and are not in accordance with an up to date Local Plan. Applications for main town centre uses should be located in town centre locations, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. Paragraph 87 adds that when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and LPAs should demonstrate flexibility on issues such as format and scale.

1.3.2.1.5 Paragraph 89 of the NPPF confirms that when assessing applications for retail and leisure development outside of town centres, which are not in accordance with an up-to-date development plan, LPAs should require an impact assessment if the development is over a proportionate, locally set threshold. If there is no locally set floorspace threshold, the default threshold is 2,500 sq m of gross floorspace.

1.3.2.1.6 Impact assessments are required to assess:

- 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).

1.3.2.1.7 The NPPF directs that where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 89, it should be refused.

#### 1.3.2.2 National Planning Policy Guidance (March 2014)

1.3.2.2.1 National Planning Policy Guidance (PPG) was first published on 6 March 2014 and seeks to ensure the vitality of town centres.

1.3.2.2.2 Paragraph 010 of the PPG states that in determining planning applications and where applicable, the applicant must demonstrate compliance with the sequential test, the requirements of which must be proportionate and appropriate for the given proposal. Applicants must show that the suitability of more central sites to accommodate the proposal has been considered and demonstrate to decision makers whether there is scope for flexibility in the format and/or scale of the proposal.

1.3.2.2.3 Paragraph 010 clarifies that it is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal. If there are no suitable preferable locations, the sequential test is passed.

- 1.3.2.2.4 Paragraph 011 states that 'the use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification must be provided where this is the case.'
- 1.3.2.2.5 In relation to the impact test, paragraph 017 provides a step by step guide to applying the impact test in order to consider the potential impacts of the proposed development's turnover and trade draw. Impacts should be considered on existing, committed and planned investment within the given catchment area, town centre vitality and viability, and in centre trade and trade in the wider area.
- 1.3.2.2.6 Where the impacts of the proposed development are not likely to be significantly adverse, then the positive and negative effects should be considered alongside all other material considerations to determine the outcome of the application.

### 1.3.3 Regional Retail Planning Policies

#### 1.3.3.1 The London Plan, March 2016

- 1.3.3.1.1 The London Plan identifies the existing role and function of town centres in the London retail hierarchy and provides a broad indication of future growth potential for each centre. We set out the London hierarchy of centres below, with a focus on centres which fall within the Boroughs of Tower Hamlets and Hackney [Source: London Plan, Annex 2, A2.3]:
- International centres: Globally renowned retail destinations with a wide range of high-order comparison and specialist shopping with excellent levels of public transport accessibility (e.g. West End and Knightsbridge, no international centres located within Study Area, although nearby Stratford (LB Newham) has been identified as having the potential to change classification to International Centre over the Plan period);
  - Metropolitan centres: Serve wide catchments which can extend over several boroughs, containing at least 100,000 m<sup>2</sup> of retail floorspace with a significant proportion of high-order comparison goods (e.g. Kingston and Croydon, no metropolitan centres located within Study Area, although Canary Wharf (LBTH) has been identified as having the potential to change classification to Metropolitan Centre over the Plan period);
  - Major centres: Generally contain over 50,000 m<sup>2</sup> retail floorspace with a relatively high proportion of comparison goods and significant employment, leisure, service and civic functions (e.g. Dalston in Hackney and Canary Wharf in Tower Hamlets. Nearby, Canada Water (LB Southwark) has been identified as having the potential to change classification to Major Centre over the Plan period);
  - District Centres: Typically containing between 10-50,000 m<sup>2</sup> retail floorspace providing a mix of convenience goods and services (e.g. Mare Street and Stoke Newington in Hackney, and Bethnal Green, Brick Lane, Chrisp Street, Roman Road (east and west), Watney Market and Whitechapel in Tower Hamlets) (Bromley-by-Bow and Crossharbour (LB Tower Hamlets) – currently unclassified – have been identified as having the potential to change classification to District Centre over the Plan period);
  - Neighbourhood and more local centres: Serving a localised catchment such as local parades and small clusters of shops (centres of this scale are not specified in London Plan).
- 1.3.3.1.2 The London Plan (March 2016) was informed by two reports; the 2013 London Town Centre Health Check Analysis Report (GLA, March 2014), and the Consumer Expenditure and Comparison Goods Floorspace Need in London report (GLA and Experian, October 2013). In summarising the findings of the latter, the London Plan (2015) states that 'taking account of growth in commuter and tourist spending, retailers making more efficient use of existing space and special forms of retailing like e-tailing, it is estimated that London could have a baseline need for an additional 0.9 – 2.2 million sq m of comparison goods retail floorspace by 2036' (paragraph 4.40). When schemes in the planning pipeline are factored into the analysis, London could need an additional 0.4 - 1.6 million sq m of comparison goods retail floorspace by 2036.
- 1.3.3.1.3 Policy 2.15 of the London Plan (2015) seeks to ensure that development proposals in town centres should, inter alia: sustain and enhance the vitality and viability of the centre; support and enhance the competitiveness, quality and diversity of town centre retail and be in scale with the centre.
- 1.3.3.1.4 Paragraph 4.47 of the London Plan (2015) states that a vibrant and diverse retail sector is essential to London's success, and that it is vital to ensure that Londoners have access to the goods and services that they need.
- 1.3.3.1.5 Policy 4.7 states that in taking planning decisions on proposed retail and town centre development, the following principles should be applied:
- The scale of retail, commercial, culture and leisure development should be related to the size, role and function of a town centre and its catchment;
  - Retail, commercial culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport; and

- Proposals for new, or extensions to existing, edge or out of centre development will be subject to an assessment of impact.

1.3.3.1.6 The site is located within the Central Activities Zone (CAZ). Policy 2.10 sets out the strategic policies for the CAZ which include supporting and improving the retail offer of the CAZ for residents, workers, visitors and international tourists. The Policy confirms that the priority should be to sustain and manage the attractions of the CAZ as the world's leading visitor destination. Policy 4.8 supports a successful and diverse retail sector.

1.3.3.1.7 Policy 2.11 states that a key strategic function within the CAZ is to enhance and expand retail capacity to meet strategic and local needs. In addition, night time activities should be provided in strategic clusters in and around the CAZ. The London Plan identifies that 45 per cent of the gross baseline need for additional comparison goods floorspace is in the CAZ (paragraph 4.41).

#### **1.3.3.2 Draft New London Plan, December 2017**

1.3.3.2.1 The Mayor of London published the Draft London Plan (DLP) for consultation in December 2017. The Examination into the Draft London Plan commenced on 15th January 2019 and closed during May 2019. The plan remains in draft and does not currently form part of the LBTH and LBH Development Plan, but is moving towards adoption and some weight can be applied to the document when considering The Goodsyard planning application.

1.3.3.2.2 In general, the new draft London Plan policy framework remains consistent with the previous 2016 adopted version. The draft document continues to seek a vibrant and diverse retail sector, sets out the principles to be applied when considering planning applications, and recognises the role of the CAZ in supporting and improving the retail offer for residents, workers visitors and international tourists. The Goodsyard site continues to sit within the CAZ boundary.

1.3.3.2.3 Paragraph 2.4.10 identifies the CAZ as containing a vibrant, successful and diverse retail offer at a scale and quality that makes it a shopping destination of global significance. It is described as containing a range of unique centres and mixed-use clusters with a predominant retail function which perform different roles in the wider London Plan town centre network.

1.3.3.2.4 Annex 1, The Town Centre Network, introduces a new 'town centre' category – CAZ Retail Clusters. They are defined as significant mixed-use clusters located within the Central Activities Zone, with a predominant retail function and, in terms of scale, broadly comparable to Major or District centres.

1.3.3.2.5 Table A1.1 (Annex 1) classifies London's larger town centres into five categories including International, Metropolitan, Major and District centres, as well as CAZ retail clusters. Shoreditch – within which the Goodsyard application site is located – is categorised as a CAZ retail cluster, and can therefore be defined as one of London's larger designated town centres. Policy SD4 directs local authorities to define the detailed boundary of these specialist clusters in their Development Plans.

1.3.3.2.6 The Draft London Plan (2017) is informed by two up-to-date reports; the 2018 London Town Centre Health Check, and Consumer Expenditure and Comparison Goods Retail Floorspace Need in London report (2017). As an update to the adopted London Plan, the new Draft London Plan states that 'taking into account projected growth in household, commuter and tourist spending, retailers making more efficient use of existing space, and special forms of trading, it is estimated that London could have a baseline need for additional comparison goods retailing of around 1.6 million sqm over the period 2016-2041, or 1.2 million sqm when current schemes in the planning pipeline are taken into account.'

1.3.3.2.7 Overall, the CAZ is projected to have demand for approximately 375,000 sq m of additional comparison goods retail floorspace over the period 2016-2041 (after the committed pipeline of retail development is taken into account). Within this context the vitality and viability of the international shopping centres and other CAZ retail clusters – including Shoreditch – should be enhanced along with improvements to the quality of the environment and public realm.

#### **1.3.4 Tower Hamlets Local Plan**

##### **1.3.4.1 Tower Hamlets Local Plan (September 2010)**

1.3.4.1.1 The Tower Hamlets Core Strategy was adopted in September 2010 and sets the planning policy context for the Borough. The application site falls within the Shoreditch area, and Policy LAP 1&2 identifies that The Goodsyard is a major opportunity for mixed-use development.

1.3.4.1.2 Core Strategy Policy SP01.1 seeks to apply the town centre hierarchy as follows: a) Central Activity Zone; b) Tower Hamlets Activity Areas; c) Major Centre; d) District Centre; e) Neighbourhood Centre. Core Strategy Policy SP01.2 seeks to ensure that the scale and type of uses within town centres are consistent with the hierarchy, scale and role of each town centre. SP01.3 seeks to promote food design in town centres.

1.3.4.1.3 The policy also seeks to maintain, focus and increase the supply of town centre activity and retail floorspace across the borough to meet identified demand and support town centres as vibrant economic hubs. Policy SP01.4.



encourages, as a priority, 16,600 m<sup>2</sup> (net) floorspace of comparison retail in the town centres of Canary Wharf, Chrisp Street, Brick Lane, Bethnal Green, Crossharbour and Bromley by Bow.

- 1.3.4.1.4 Core Strategy Policy SP01.5. promotes areas outside, and at the edge of town centres, as places that support and assist in the creation of sustainable communities by promoting mixed use development at the edge of town centres and supporting uses outside of town centres.

#### **1.3.4.2 Tower Hamlets Managing Development Document (April 2013)**

- 1.3.4.2.1 The Managing Development Document (MDD) was adopted by the London Borough of Tower Hamlets in April 2013. The document forms part of the Development Plan and provides site allocations and development management policies.
- 1.3.4.2.2 The application site is allocated for a 'comprehensive mixed-use development opportunity required to provide a strategic housing development, a local park, an Idea Store and a district heating facility (where possible). The development will also include commercial floorspace and other compatible uses'.
- 1.3.4.2.3 The indicative development capacity for the site is for 350,000 m<sup>2</sup> of total development for the site comprising approximately 75,000-150,000 m<sup>2</sup> of employment, retail and community uses, alongside up to 2,000 homes and 1.8 hectares of publicly accessible open space.

#### **1.3.4.3 Bishopsgate Goodsyard Interim Planning Guidance (2009)**

- 1.3.4.3.1 The Bishopsgate Goodsyard Interim Planning Guidance (IPG) was prepared and adopted prior to the adoption of the Local Plan. Although somewhat out of date, this document is drawn upon for the purposes of development management and are used alongside the Local Plan to determine planning applications.
- 1.3.4.3.2 The Interim Planning Guidance (IPG) for Bishopsgate has been prepared jointly by the London Borough of Tower Hamlets, the London Borough of Hackney and the Greater London Authority. The IPG brings together planning policies – relevant at that time – to provide a framework for the redevelopment of the site.
- 1.3.4.3.3 Paragraph BG7 of the IPG seeks for the redevelopment to strengthen local character by providing a mix of uses including uses which provide activity during the day and into the evening, space for small scale shops to meet day to day needs and more specialist retail and flexible space for small and medium sized businesses.
- 1.3.4.3.4 Paragraph BG18 states that 'development should include active ground floor uses that will strengthen the retail character of Shoreditch High Street'.
- 1.3.4.3.5 Paragraph 3.20 states that uses associated with the evening economy (restaurants and bars) 'may be appropriate as part of the development of the Goodsyard, where it can be demonstrated that they can be located and operate in a way that would not give rise to increased problems of late night noise and disturbance to local residents...In order to create a balanced mix of retail uses, no more than 25% of all retail floorspace should be taken up by cafes, restaurants and bars'.

#### **1.3.4.4 Draft Tower Hamlets Local Plan 2031 (October 2017)**

- 1.3.4.4.1 LBTH are at an advanced stage in developing their new Local Plan. It is currently undergoing an independent public examination following its submission to the government in February 2018. As part of the examination process, the government-appointed inspector has proposed changes to the Local Plan and is inviting comments on them. The consultation ran from 25th March 2019 to 9th May 2019.
- 1.3.4.4.2 Policy S.TC1 supports the network and hierarchy of centres, and confirms that development is required to support the role and function of the borough's town centre hierarchy and the provision of town centre uses in line with the principles set out in Policy S.TC1. In respect of development within the Central Activities Zone (CAZ), the Policy directs relevant parties and decision makers to apply the London Plan's approach/policy framework.
- 1.3.4.4.3 Paragraph 6.6 identifies that the western part of the borough (as shown on figures 5 and 12) lies within the Central Activities Zone. The Central Activities Zone is described as the geographical, economic and administrative heart of London, one of the world's most important financial and business centres, containing the major employment, leisure and retail designations within London. In support of Policy S.TC1, paragraph 6.7 confirms that all development proposals within this zone should primarily refer to the relevant policies set out in the London Plan and the Central Activities Zone Supplementary Planning Guidance.
- 1.3.4.4.4 Policy S.TC1, point 2, sets out that new development within the Central Activities Zone, Tower Hamlets Activity Areas and designated Major, District and Neighbourhood Centres will be expected to support the delivery of new retail and leisure floorspace to meet identified needs. Table 4, page 99, identifies a comparison goods retail floorspace need of 6,590 sq m over the plan period, but adds that proposals beyond those figures are acceptable provided it can be demonstrated that a demand does exist for such floorspace and that it would not detrimentally harm the viability and vitality of existing floorspace in nearby town centres.



- 1.3.4.4.5 Floorspace need was an issue discussed at the current Examination in Public, and figures set out in the draft new Local Plan may change. Reference was made to new development having the ability to draw in new visitors, increasing market share, thereby supporting an additional level of retail floorspace above baseline 'need' – a point raised, discussed and accepted by LBTH at the Examination Hearing.
- 1.3.4.4.6 Policy D.TC5, 'food, drink, entertainment and the night-time' economy confirms that cafés, restaurants and drinking establishments (use classes A3, A4 and AA) will be supported within the Central Activities Zone, Major Centre, Tower Hamlets Activity Areas, District Centres and Neighbourhood Centres (as shown on the Policies Map) provided that it can be demonstrated that the overall vitality and viability of the town centre would be enhanced.
- 1.3.4.4.7 In order to realise the vision and objectives of the Local Plan, a series of sub-areas have been identified to positively manage development opportunities and change in the borough at the strategic level. Bishopsgate Goodsyards – the application site – is located within the City Fringe Sub-Area.
- 1.3.4.4.8 The Vision for City Fringe aspires for it to become a more attractive place to live, work and visit. New communities will be well integrated into the area, benefiting from the close proximity to existing and new employment, and retail and leisure uses within the wider area. Whitechapel, Cambridge Heath, Shoreditch (the location of the Goodsyards), Spitalfields and Aldgate will all have a more diverse mix of commercial, cultural, leisure, tourism and night-time activities.
- 1.3.4.4.9 Paragraph 2.7 confirms Bishopsgate Goodsyards as one of four key strategic mixed-use site allocations within the City Fringe. Page 183 sets out the design requirements for the Goodsyards, including the improvement of walking and cycling routes to, from and within the site to establish connections to Shoreditch High Street Overground station, Brick Lane district town centre and the new open space. These should align with the existing urban grain to support permeability and legibility.

### **1.3.5 Hackney Local Plan**

#### **1.3.5.1 Hackney Core Strategy (November 2010)**

- 1.3.5.1.1 The Hackney Core Strategy was adopted in November 2010 and sets out the planning policy context for the Borough. One element of the spatial vision for 2025 is that economic growth is accommodated in appropriate locations, with retail and commercial uses primarily focused around town centres and transport hubs.
- 1.3.5.1.2 Within South Shoreditch (within which the site is located), the spatial vision for 2025 is that the area will continue to thrive with its mix of commercial, niche retail, and evening economy, as well as an attractive destination for inner city living and lifestyle.
- 1.3.5.1.3 Core Strategy Policy 13 (town centres) states that the Council will promote and encourage development of retail, office, community, leisure, entertainment facilities, recreation uses, arts, culture and tourism activities within its major and district centres.
- 1.3.5.1.4 The vitality and viability of town centres will be safeguarded by requiring planning applications for town centre uses to follow the assessment approach set out in the relevant national planning policy guidance.

#### **1.3.5.2 Hackney Development Management Local Plan (DMLP) (July 2015)**

- 1.3.5.2.1 The development management local plan (DMLP) sets out detailed, generally criteria-based, planning policies which are used, together with the London plan, the core strategy and other supplementary planning documents, to assess planning applications. The Council formally adopted the development management local plan (DMLP), including the policies map, on 22 July 2015.
- 1.3.5.2.2 Policy DM7 (new retail development) states that proposals for new, or extensions to existing edge or out-of-centre, retail or leisure development in excess of 200 sq m gross floorspace will not be granted planning permission, unless they meet the Council's sequential assessment requirements and the Council is satisfied with a retail and impact assessment submitted with an application for proposals in excess of the above threshold.
- 1.3.5.2.3 Paragraph 4.2.2. acknowledges that whilst the CAZ provides a mix of uses, it is not a designated town centre in Hackney, and as such it is not considered a focus for retailing and other town centre uses. Given the passage of time, this policy point is out-of-date. Policy LP32 of the Draft Submission Local Plan – discussed later in this section – emphasises that identified retail floorspace need should be directed to the network of town centres including the CAZ (and Shoreditch more specifically).
- 1.3.5.2.4 Paragraph 4.2.2 is also inconsistent with the more recent 2016 London Plan and new (draft) London Plan, both of which emphasise that a key function within the CAZ is an enhancement and expansion of retail capacity to meet strategic and local needs. In the new (draft) London Plan, Shoreditch is identified as a Retail Cluster – an acknowledged and identified 'town centre' in the London-wide retail hierarchy (Annex 1 of Draft London Plan).

- 1.3.5.2.5 Paragraph 4.2.6. states that new large scale retail and leisure development should incorporate mixed uses, to ensure optimal use of land and the vibrancy and vitality of town centres are improved and enhanced.
- 1.3.5.2.6 Proposed Policy DM8 (small and independent shops) requires planning applications for more than 1,000 m<sup>2</sup> A use class retail use to incorporate small shop units (generally less than 80 m<sup>2</sup> GIA) suitable for small and independent retailers, equivalent to at least 10% of the total amount of proposed retail GIA.
- 1.3.5.3 Hackney Site Allocations Local Plan (SALP) (July 2016)**
- 1.3.5.3.1 The site allocations local plan (SALP) will support the delivery of the core strategy and the development management local plan, as it identifies key strategic sites for development across the borough. The SALP was adopted by the Council on 20 July 2016. The adopted SALP includes the modification recommended by the planning inspector to make the plan sound and / or legally compliant.
- 1.3.5.3.2 Site Allocation 108 covers the Bishopsgate Goods Yard area. The allocation establishes that the site is currently used as a temporary 'pop up' retail mall. The proposed allocation states that 'in terms of appropriate uses in Hackney's section of the site, office-led mixed use including residential, retail, and public open space may be appropriate on the site'. The site allocation supports retail on site and therefore the proposals accord with the development plan and the NPPF.
- 1.3.5.4 South Shoreditch SPD (February 2006)**
- 1.3.5.4.1 The South Shoreditch SPD provides a planning framework for this area of the borough, which encompasses the development site. SSSPD Policy 2.3 (retail) states that 'the Council will seek to promote retail uses as part of a mix of uses, in appropriate locations; retail uses which would provide valuable facilities for local residents and workers, including vulnerable people' are supported.
- 1.3.5.4.2 SSSPD Policy 10.3 (v) states that at Bishopsgate Goods Yard, 'the Council will seek the phased comprehensive mixed use development over the entire Goodsyard site which could include residential (C3), business (B1), small-scale retail/leisure (A1,A2,A3,A4,D2), and public open space'.
- 1.3.5.5 Hackney Draft Submission Local Plan (LP33) (November 2018)**
- 1.3.5.5.1 Like Tower Hamlets, LB Hackney are at an advanced stage in the preparation of their new Local Plan. The Draft Submission Local Plan was consulted upon from 19 November 2018 to 7 January 2019, and was submitted to the Planning Inspectorate on 23 January for examination in public.
- 1.3.5.5.2 In discussing the character of Shoreditch (para.4.69), it is recognised that the area is at the centre of the UK's cultural and digital economy, and that there is a thriving night time economy in and around the South Shoreditch Triangle. The document adds that it is identified in the London Plan as a part of the capital that is of international importance for night time activity, and that there are opportunities for offices, retail and residential development along with supporting community infrastructure.
- 1.3.5.5.3 Paragraph 4.78 states that Bishopsgate Goodsyard is identified as a major development opportunity, and confirms that further details on development capacities and site allocations will be set out in the Future Shoreditch Area Action Plan (discussed below).
- 1.3.5.5.4 Chapter 9 plans for Vibrant Town Centres across Hackney and confirms that there is a requirement for 34,000 sq m of retail and leisure floorspace across the borough by 2033.
- 1.3.5.5.5 Policy LP32 confirms that this floorspace should be directed to the network of town centres including Shoreditch within the CAZ. Part B of Policy LP32 adds that the development of retail (all A classes) and/or leisure uses over 200sqm outside of the town centres listed in part (A) of this policy (excluding the CAZ) will not be permitted unless it can be demonstrated that there is no suitable premises available in the designated centres and that there would be no harm to the vitality and viability of these centres.
- 1.3.5.5.6 Bishopsgate Goodsyard is located both within Shoreditch and the CAZ and Part B of Policy LP32 is therefore not applicable. Policy LP32 confirms that the development proposals are not required to demonstrate compliance with either the sequential or impact test.
- 1.3.5.5.7 Paragraph 9.4 states that Shoreditch is not currently identified as a shopping destination or as a town centre. It does, however, sit within London's Central Activities Zone (CAZ), and the draft Local Plan proposes that Shoreditch remains part of the CAZ and therefore will not be coming forward as a standalone designated town centre. The CAZ is identified as an appropriate location for retail and leisure uses and directs the reader to the emerging Future Shoreditch AAP for details on the approach in this area.
- 1.3.5.6 Draft Future Shoreditch Area Action Plan (April 2019)**
- 1.3.5.6.1 Hackney have prepared an area action plan for Shoreditch, called Future Shoreditch. The plan sets out a vision for what Shoreditch will look like in 2034 and also the planning policies to guide and manage future development

and investment in the area. It will be a key document when making planning decisions in Shoreditch. The Council are now consulting on the draft document from 29th April to 21st June 2019.

- 1.3.5.6.2 The Vision Statement aspires to a positive, balanced land use strategy which will set the basis for a diverse mix of activities including employment, retail, cultural, leisure and residential uses. Building on the area's world-renowned heritage for culture, theatrics, entertainment and leisure, the evening and night-time economy will include more diverse uses.
- 1.3.5.6.3 The draft AAP recognises that Shoreditch does not have a traditional retail core. Instead the area has much more fluidity and variation between existing and emerging retail and commercial leisure provision dispersed throughout the area (p.38). One of the overarching objectives is to maintain and enhance the retail and leisure uses associated with Shoreditch and its role within the CAZ as a competitive retail destination for London and Hackney (p.35).
- 1.3.5.6.4 Policy FS02 aims to achieve a balanced mix of uses, avoiding proposals with 100% B1 use class, and encouraging ground floor retail, leisure, entertainment or community uses to support a vibrant mix of uses in the Central Activities Zones.
- 1.3.5.6.5 Policy FS05 supports major new arts culture and entertainment in Shoreditch, and also proposals for uses that would result in the diversification of the evening and night time economy will be supported.
- 1.3.5.6.6 As a tool to help manage new development proposals coming forward, a number of 'neighbourhoods' have been defined in the Future Shoreditch AAP. Bishopsgate Goodsyards is identified as a priority development opportunity within the Shoreditch High Street and Hackney Road neighbourhood. This area is recognised as having a more balanced mix of uses than other parts of the Future Shoreditch area, and it is therefore considered appropriate here to promote a more mixed and balanced set of land uses in redevelopment proposals,
- 1.3.5.6.7 In particular, retail and community uses which, on a day-by-day basis, support local communities and their residents will need to be provided as part of mixed-use development proposals which increase the local resident population.
- 1.3.5.6.8 The Bishopsgate Goodsyards allocation is the focus of Policy FSOS 10 (p.130). The priority opportunity site is recognised as a significant opportunity for optimising density with a mixed-use development. Retail and leisure uses are identified as being likely to perform an important role to play in the creative use of unique spaces across the site. Indicative development capacity includes 39,000 sq m of retail/community space, of which 10,000 sq m could be provided within Hackney. As already noted in Section 2, the current application proposals include 4,870 sq m of A1/2/3/5 retail floorspace within the London Borough of Hackney.

### **1.3.6 Retail Evidence Base**

#### **1.3.6.1 Tower Hamlets Town Centre Retail Capacity Study (2016)**

- 1.3.6.1.1 The Town Centre Retail Capacity Study was prepared by Carter Jonas in 2016 to inform the LB Tower Hamlets Draft Local Plan (2017). The assessment was underpinned by a new Household Telephone Survey undertaken in May 2016 and presents the most up-to-date overview of shopping patterns in the borough and adjoining catchment areas.
- 1.3.6.1.2 The Study concludes a deficiency in comparison goods need over the plan period as a consequence of major planned schemes such as Wood Wharf which will deliver a significant quantum of retail floorspace. These outputs are, however, based on current market share and make no allowance for increased trade retention or trade inflow resulting from an improved and consolidated retail offer. Paragraph 22.5 confirms that the retail capacity assessment assumes that the retail market is in 'equilibrium' at the base year (2016) and that market shares remain constant over the study period.
- 1.3.6.1.3 Paragraph 18.37 emphasises that it should be noted that the capacity assessment does not take account of the potential for major planned investment to increase the rate of expenditure retention for the Borough. Key regeneration schemes for Canary Wharf and Whitechapel are, for example, expected to enhance the profile of these centres. For Canary Wharf, the planned provision of 14,000 sqm of new comparison goods floorspace is almost certain to claw back expenditure lost to Westfield Stratford and Central London. Should this occur an increase in the Borough's comparison goods expenditure retention will increase forecast capacity for Tower Hamlets and its centres.
- 1.3.6.1.4 In this context, all development proposals should be considered on their own merits, taking into account scale, mix, range of goods, and type/extent of likely catchment area. Given the caveats made throughout the evidence based document, the 'need' figures quoted should not be read as the final and only option for the borough. This position is confirmed by the outputs of the most recent Experian 'Consumer Expenditure and Comparison Goods Floorspace Need in London' report (2017) which identifies a need for 375,000 sq m of retail floorspace across the CAZ to the period 2041. This is broadly equivalent to four additional Westfield Shopping Malls of the scale located in Stratford, Newham.

### 1.3.6.2 Hackney Town Centre and Retail Study (2017)

- 1.3.6.2.1 The Town Centre and Retail Study was prepared by GVA in 2017 to inform the LB Hackney Draft Local Plan (2018). The assessment was underpinned by a new Household Telephone Survey undertaken in March 2017 and presents the most up-to-date overview of shopping patterns in the borough and adjoining catchment areas.
- 1.3.6.2.2 Table 10.4 sets out a need for additional comparison goods floorspace of between 16,600 and 19,500 sq m to the period 2033, over and above the implementation of key commitments including The Stage, Shoreditch Village and art'otel Great Eastern Street/Rivington Street.
- 1.3.6.2.3 Consistent with the methodology used for the Tower Hamlets evidence based, the Hackney need forecasts are based on current market share and also make no allowance for increased trade retention or trade inflow resulting from an improved and consolidated retail offer. There is therefore opportunity to support a greater level of comparison goods floorspace if it is assumed that new floorspace will increase trade retention – thereby increasing market share – and also trade inflow from beyond the survey area, given the London-wide, national and international draw of Shoreditch and the City Fringe.

### 1.3.7 Conclusion

- 1.3.7.1 The previous 2015 Retail Assessment (in support of the Goodsyards planning application), concluded that the application site is allocated for comprehensive redevelopment in both the LBTH and LBH development plans. The site allocations included the provision of an element of retail uses, but the amount was not quantified. The 2015 Study confirmed that the Goodsyards application site is located within the CAZ – an area considered to be a strategic location for retail and leisure development to support local residents, workers, domestic visitors and international tourists.
- 1.3.7.2 The policy framework reviewed in the 2015 Retail Assessment remains adopted and therefore relevant to the consideration of the planning application, but the GLA, LBTH and LBH are all in the advanced stages of preparing new development plans. All are moving through the final examination process. The review of emerging policy set out in this section has identified a stronger and more proactive policy approach to the development of retail and leisure floorspace at the Goodsyards site since 2015. We summarise the key areas of change as follows:
- The Draft New London Plan (2017) introduces a new 'town centre' category within the town centre network (Annex 1) – a CAZ Retail Cluster. Shoreditch is categorised as a CAZ Retail Cluster, and can therefore be defined as one of London's larger designated town centres.
  - The Draft Tower Hamlets Local Plan (2017) allocates Bishopsgate Goodsyards as a key strategic mixed-use development site within the City Fringe.
  - Policy S.TC1 of the Draft Tower Hamlets Local Plan (2017) states that new development within the CAZ will be expected to support the delivery of new retail and leisure floorspace to meet identified needs. The draft Local Plan confirms that development proposals within the CAZ should primarily refer to the relevant policies set out in the London Plan and CAZ SPG.
  - Hackney Site Allocations Local Plan (2016) supports mixed-use development at the Bishopsgate Goodsyards including retail floorspace.
  - Policy LP32 of the Hackney Draft Submission Local Plan (2018) states that identified retail and leisure floorspace need (34,000 sq m) should be directed to the network of town centres including Shoreditch within the CAZ.
  - The Hackney Draft Submission Local Plan (2018) states that Bishopsgate Goodsyards is identified as a major development opportunity, but that further details on development capacities and site allocations will be set out in the Future Shoreditch Area Action Plan.
  - The Draft Future Shoreditch AAP (2019) identifies indicative development capacity of 39,000 sq m of retail/community space within the Bishopsgate Goodsyards 'priority development opportunity'.
  - Policy FS02 of the Draft Future Shoreditch AAP (2019) encourages a balanced mix of uses across Shoreditch – to include retail/leisure – in order to support a vibrant mix of uses in the CAZ. Within Bishopsgate Goodsyards, retail uses are encouraged as part of mixed-use development proposals which increase the local resident population.

# THE GOODSYARD

## 4.0 ANALYSIS OF EXISTING CENTRES

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## 1.4 ANALYSIS OF EXISTING CENTRES

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1.4.1 In this section, we provide an assessment of the network of centres in the immediate proximity (i.e. within 1km) of the application site, in order to understand the current performance and 'vitality and viability' of each centre. The assessment draws on empirical evidence provided in the Council's published Retail Studies and our own observations of the centres.

1.4.2 We also provide an assessment of the retail offer in higher-order centres further afield, such as Central London/The West End, Angel and Stratford, to help contextualise the positioning of the offer of the Goodsyards within the wider central and East London context. Our findings set out in this section in turn informs our assessment of the ability of the network of centres to withstand the modest impacts which can be expected to arise as a consequence of the application scheme (detailed further in our impact assessment, Section 6).

1.4.3 In undertaking our analysis of the 'health' of nearby centres, we have principally drawn on the evidence base studies undertaken in support of LB Tower Hamlets and LB Hackney's respective new Local Plans. These are the Tower Hamlets Retail Capacity Study (Carter Jonas, 2016) and the Hackney Retail & Town Centres Study (GVA, 2017). Both studies undertook comprehensive 'health checks' of centres at all levels in each Borough's respective retail hierarchies, and their recent publication and role as Local Plan evidence base studies ensures they form a robust position on which to assess the current performance of the local network of centres. For centres which fall outside LBH and LBTH, we have used a combination of desktop research and site visits to undertake our assessments.

### 1.4.4 Part 1: Centres within 1km of the application site

#### 1.4.4.1 Brick Lane (district centre, LB Tower Hamlets)

1.4.4.1.1 Brick Lane is the closest policy-defined centre to the application site and adjoins its eastern boundary. A detailed 'health check' of Brick Lane district centre was undertaken as part of the LBTH Retail Capacity Study (THRCS) (2016). The centre is a large centre, stretching from Redchurch Street/Bethnal Green Road to the north (the part of the centre which lies proximate to the application site) to Whitechapel Road to the south.

1.4.4.1.2 The THRCS identified that 'The scale of the land uses found along Brick Lane is different to those across the rest of the borough due to the larger concentration of leisure uses including an evening economy appealing to both local residents and visitors and creative industries. Brick Lane has experienced major change over recent years and has transformed into a centre which has become a focus for the creative industries, fashion industries and a strong evening economy, particularly for Bangladeshi restaurants.'

1.4.4.1.3 In terms of diversity of uses, the health check found that:

- Brick Lane has a lower than average proportion of comparison (non-food) uses in the centre, with a particular focus on fashion and vintage clothing, as well as art galleries, record shops and textile shops. The health checks notes that whilst 'provision is considered to be below the average number of units, the overall provision is much more varied and distinctive than in other district centres within the Borough, therefore a wider range of people are attracted to visit the centre'. It adds that the alternative/independent offer of Brick Lane is one of its main attractions, and this should not be undermined by an influx of national multiple retailers opening in the centre.
- Convenience provision is strong, though entirely consisting of independent convenience and confectionary stores, together with a market selling convenience goods on a Sunday. A need for a larger-format supermarket to meet local residents' shopping needs is identified.
- Brick Lane's café and restaurant provision is amongst the strongest across the whole of LBTH, with a vast number of Indian restaurants and cafes which are distributed along the length of the centre helping to make Brick Lane a distinct and diverse visitor destination. The health check identifies scope for the evening economy to be further enhanced by additional public house/bar provision.
- The street market, which trades on a Sunday only, further adds to the diversity of uses in the centre, and attracts both local residents and tourists. The privately-run markets which operate every Sunday in the Truman Brewery (e.g. SundayUp for vintage clothing and food; Backyard Market for arts & crafts and The Tea Rooms for antiques and homeware are identified as a destination in their own right. The health checks suggests that consideration should be given to opening the market on Saturdays.
- Vacancy levels were lower than the UK average (10% at the time of survey), and barring a small concentration on Redchurch Street, vacant units were mostly small shop/restaurant units spread throughout the centre.

1.4.4.1.4 The THRCS health check identified the following strengths of Brick Lane district centre:



- 'Brick Lane's high time economy, specifically in terms of restaurants and cafés is considered to be one of the strongest within the borough. The centre is famous for its abundance of curry houses. Alongside this are a number of unique cafes/restaurants, which help to make Brick Lane a distinctive visitor destination, attracting those from across London.
- The street market operates every Sunday and is one of the most popular markets within borough and London. The traditional market is known for selling everything including bikes, clothing, jewellery, antiques and vintage clothing. There are also five markets held within the Truman Brewery including the Boiler House Food Hall which sells a variety of food from across the world. This provides Brick Lane Market with a distinctive offer which is different to any of the other markets operating in the borough.
- Street art is found across the centre. Despite graffiti being viewed as vandalism in many of the other centres, it is perceived as being one of Brick Lane's key assets and contributes to the centre's unique character.
- Over recent years Brick Lane has become home to the creative industries. This is seen as being an asset to the centre and helps to diversify the number of uses along Brick Lane.
- Although comparison provision is just below the national average, the provision that is within the centre is diverse despite the lack of national multiples. Goods sold include fashion (including vintage and leather goods), music records, art and textiles.'

#### 1.4.4.1.5 The THRCS health check identified the following weaknesses of Brick Lane district centre:

- 'The market only operates on a Sunday. During the week there is less activity throughout the centre and it is considered that it could be beneficial for the centre to increase the frequency of a market to attract more visitors to Brick Lane during weekdays or on Saturdays.
- The centre could benefit from attracting a larger supermarket to Brick Lane. Only small convenience stores occupy the centre and the majority of these generally target the local Bangladeshi community.
- There are a cluster of vacant units located along Redchurch Street which need to be managed to ensure they do not become derelict and additional units do not also become vacant.
- Pedestrian accessibility around Brick Lane is somewhat confusing and additional signage is needed.
- The surrounding street layout is complex and could be difficult for new visitors who are coming to the centre to navigate.'

#### 1.4.4.1.6 It is clear from the health check that Brick Lane is performing well as a centre, and its diverse offer, particularly when enhanced by the Sunday street and Truman Brewery markets, are making it both a centre to meet local shopping needs, but also playing a significant role as a tourism destination. It is expected that the development of the application scheme will assist in permeability of the area for both visitors and locals, helping to create a clearly defined 'circuit' linking Brick Lane, Shoreditch and Spitalfields, thus responding to one of the weaknesses of the centre identified in the health check analysis.

#### 1.4.4.2 Whitechapel (district centre, LB Tower Hamlets)

- 1.4.4.2.1 Whitechapel district centre is located 750m to the south of the application site (and is most easily accessed via Brick Lane district centre, as reviewed above). The centre is a historic linear centre running along the busy Whitechapel Road, with commercial activity predominantly concentrated on the northern side of the road. The THRCS identifies that in addition to its shopping function, the centre has a number of major attractions and institutions which draw people to the centre, e.g. the Royal London Hospital, a campus of Queen Mary University, and the Whitechapel Idea Store, which is London's second biggest public library. Whitechapel will also benefit from being located on the Elizabeth Line upon its opening, and construction works on new interchange facilities at the station are ongoing.
- 1.4.4.2.2 Subsequent to the publication of the THRCS, it has been confirmed that LB Tower Hamlets will relocate their Civic Centre to Whitechapel in 2022, which will deliver additional footfall and spend in the centre, and provide further diversity of uses.
- 1.4.4.2.3 The centre is anchored by a large Sainsbury's store which bookends the eastern end of the centre; units run west from this along Whitechapel Road until it meets the City. The Sainsbury's site has been the subject of proposals in recent years to densify the site and deliver residential uses above a re-developed foodstore. Several other parcels of land within or close to the district centre boundary are identified as having redevelopment potential.
- 1.4.4.2.4 The daily street market makes a highly important contribution to the overall vitality and viability of the centre, the THRCS noting that it is the only street market in the Borough to operate at full capacity during certain days of the week. The THRCS adds that the market is 'considered to be an important economic and social hub for the local community and it assists with the generation of footfall and activity across the centre. The market is considered to

be popular with local residents, particularly those from the surrounding Bangladeshi community which accounts for 38% of Whitechapel's population'.

1.4.4.2.5 The THRCS identified Whitechapel as having a vacancy rate of 6.7%, below the UK average of 11.2%. Vacant units were found to be mostly located in peripheral parts of the centre. The study noted that 'the redevelopment of Whitechapel station, the arrival of Crossrail and the delivery of other investment projects in the centre are likely to drive demand for shop units and increase rents. This in turn is likely to reduce vacancies assuming current vacant stock can be adapted to meet retailer requirements.'

1.4.4.2.6 The THRCS health check identified the following strengths of Whitechapel district centre:

- 'The centre is characterised by a high proportion of convenience floorspace, anchored by a Sainsbury's and supported by a wide range of independent grocers, butchers and bakers, including ethnic/specialist food retailers. The street market also sells food goods.
- There is a strong provision of financial and professional services across the centre, mainly including banks. There are approximately eight retail banks in Whitechapel.
- The current vacancy rate is 6.72% which is a reduction in the vacancy rate recorded by Experian Goad in 2014 (although it is an increase since the 2008 survey). However, this vacancy rate is below the UK average and suggests that the centre is generally healthy and performing well.
- The station is currently being redeveloped to accommodate the new Crossrail station. This will increase the accessibility of the centre alongside creative new investment and regeneration opportunities for the centre.
- Many of the buildings are considered to be of an interesting architectural style which should be enhanced to reflect Whitechapel's historic character.'

1.4.4.2.7 The THRCS health check identified the following weaknesses of Whitechapel district centre:

- 'Although Whitechapel appears to have a strong leisure provision with an above average proportion of units occupied by this use, closer analysis shows that Whitechapel's food and beverage offer is largely dominated by independent fast food/takeaway outlets. The Experian audit identified approximately 15 takeaway outlets which is equivalent to 42% of the total leisure provision.
- Despite the market being one of Whitechapel's key assets, similarly to Bethnal Green the pavements are congested due the arrangement of the market stalls which also conceal Whitechapel road street frontage and causes accessibility issues for pedestrians. The market's offer is also considered to be in need of a wider offer to help attract commuters and visitors from outside of the centre.
- Many of the buildings are poorly maintained and in need of repair. There are also issues with littering and graffiti across the centre.'

#### **1.4.4.3 Bethnal Green (district centre, LB Tower Hamlets)**

1.4.4.3.1 Bethnal Green is a busy district centre, located either side of Bethnal Green Road c.660m north-east of the application site. The boundary of the district centre also extends southwards along Cambridge Heath Road. The 'anchor' stores to the district centre are Tesco and Iceland stores located on Bethnal Green Road, whilst the comparison goods offer is orientated towards serving the local Bangladeshi community and, with the exception of Boots and Specsavers, there are few national comparison retailers. A street market also trades in the centre from Monday to Saturday, selling a mixture of clothing, homeware, fruit & veg, and health & beauty goods. The centre also has a strong service function, with several banks present in the centre (e.g. HSBC, Barclays and Santander) and eight estate agents. In short, it is clear that the centre is currently performing the role and function one would expect of a district centre.

1.4.4.3.2 The centre offers a number of restaurants, pubs and bars, most of which are operated by local/independent operators, with the exception of Nando's and La Porchetta, a north London-based pizza chain. The Star of Bethnal Green is a popular drinking destination which also hosts a number of club nights.

1.4.4.3.3 The THRCS health check identified the centre to have a low vacancy rate of just 1.9%, compared to a UK average of 11.2%.

1.4.4.3.4 The THRCS identified the following key strengths of Bethnal Green district centre:

- 'Convenience provision is strong and is higher than the national average. The centre is anchored by a Tesco Metro which sells a small range of comparison goods in addition to food goods. An Iceland store and Sainsburys Local are also in the centre.
- Bethnal Green's vacancy rate is significantly lower than the UK national average (1.92% compared to 11.39%) which suggests the centre is healthy.



- The market contributes to Bethnal Green's overall character and helps to attract local residents to the centre.'

1.4.4.3.5 The THRCS identified the following key weaknesses of Bethnal Green district centre:

- 'High levels of traffic congestion along Bethnal Green Road detract from the centre's environmental quality. High levels of noise pollution deter from the pedestrian experience.
- There are a number of units that are in need of refurbishment and modernisation. Many of the buildings are of historic architectural interest therefore buildings should be enhanced and maintained to reflect this.'

#### **1.4.4.4 Liverpool Street/Bishopsgate (CAZ Retail Cluster, City of London)**

1.4.4.4.1 The Liverpool Street / Bishopsgate centre is located in the CAZ near to Liverpool Street station and is situated approximately 540m to the south of the site. The core retail frontages of the centre are linear in nature, focused along Old Broad Street, Wormwood Street and Liverpool Street. The centre comprises approximately 120 retail units, predominantly multiple comparison retailers including clothes shops, mobile phone retailers, chemists and opticians.

1.4.4.4.2 The offer of the centre primarily serves employees within the City, commuters using Liverpool Street station, as well as City residents and tourists. Reflecting this, its retail offer is principally orientated towards convenience and food/drink retailers, including a high number of sandwich bars and similar 'food to go' outlets. Sitting alongside this is a range of smaller-format 'everyday' comparison goods retail, catered towards the needs of passing commuter traffic, and the majority of the centre's comparison goods offer is contained within Liverpool Street station itself – such as WHSmith, Boots, Accessorize, Hotel Chocolat, Cards Galore, Scribbler (cards/gifts), Carphone Warehouse and Vodafone.

#### **1.4.4.5 Columbia Road (neighbourhood centre, LB Tower Hamlets)**

1.4.4.5.1 Columbia Road (c.600m north of the application site) is a famous centre despite its classification as a lower-tier neighbourhood centre, on account of the popular Columbia Road Flower Market which is held every Sunday between 8am and 2pm, transforming the street into a bustling flower market covering approximately 50 stalls. Like Brick Lane, the centre attracts both locals and tourists. The centre benefits from proximity to another local shopping centre at Broadway Market (in LB Hackney). Sitting alongside the flower market are 47 retail units, all of which are occupied by independent retailers, and mostly specialising in higher-end gifts, homewares and lifestyle goods. There are also two cafes and three public houses, plus two small convenience goods shops.

1.4.4.5.2 Such is the success and popularity of the Flower Market, many of the retailers in the centre only open on Sundays or at weekends. Therefore it does not fulfil the role of a typical neighbourhood centre either in terms of its hours of operation, or the range of goods it sells (i.e. there is very little in the way of 'day to day' shopping facilities for local residents). Nevertheless, the centre is popular and has a low vacancy rate, and in this context can be considered to be performing well.

#### **1.4.4.6 Mile End (neighbourhood centre, LB Tower Hamlets)**

1.4.4.6.1 A relatively large neighbourhood centre focussed around Mile End LUL station and adjacent roads, approximately 900m from the application site. The centre is anchored by a Co-Op supermarket on Mile End Road, and a strong leisure provision which include branches of Starbucks, Costa and Nando's. In addition to local residents and commuters, the centre can also be expected to meet some of the day-to-day needs of the student community at the nearby Queen Mary University campus. The vitality and viability of the centre appears generally positive, and at 12.5% (2016) the vacancy rate is broadly in line with the UK average (11.2%).

#### **1.4.4.7 Hoxton Street (local shopping centre, LB Hackney)**

1.4.4.7.1 The vitality and viability of Hoxton Street local shopping centre was considered as part of the LB Hackney Retail & Town Centres Study (2017). This identified the centre be 'performing generally well', with two clear 'anchor' stores in the form of Poundland and Iceland. The Iceland supermarket is currently the only main supermarket serving the Hoxton and South Shoreditch area. The study identified that the daily street market made a positive contribution to the overall 'health' of the centre. The centre benefits from a low vacancy rate.

1.4.4.7.2 The study identified some scope for improvement in the environmental quality of the centre, particularly in terms of improvements to shop fronts, and an absence of a bank, but considered that overall the vitality and viability of the centre was good.

#### **1.4.4.8 Whitecross Street / Barbican (local shopping centre, LB Islington)**

1.4.4.8.1 Whitecross Street local shopping centre is located in the south of LB Islington, to the north of the Barbican, around 1 km from the application site. Whitecross Street centre comprises approximately 49 units, predominantly small scale independent stores which are occupied by a high proportion of specialist comparison goods retailers, and a strong service sector. There are numerous cafes, restaurants and hot food takeaways. A Waitrose store at the southern end of the centre provides the 'anchor' store to the centre.

1.4.4.8.2 In addition, Whitecross Street is home to a daily general market, and on Thursday and Fridays provides a specialist food market which is very popular with local office workers, with a number of the retail units also clearly performing this role and function. Overall, Whitecross Street can be considered to display positive signs of vitality and viability.

#### **1.4.5 Part 2: The sub-regional network**

1.4.5.1.1 Central London / The West End (International Centre, LB Westminster/Camden)

1.4.5.1.2 Central London / the West End comprises of key retailing, employment and leisure areas such as Oxford Street, Regent Street, Tottenham Court Road, Soho, Carnaby and Covent Garden. It is recognised as an 'International' centre in the Draft London Plan, and is a globally-renowned retail and leisure destination which offers a wide range of comparison goods shopping. Central London is linked to the application site via the Central Line at Liverpool Street, as well as a bus route 8, which provides a direct connection to Tottenham Court Road.

1.4.5.1.3 The retail offer across Central London and the West End includes:

- Large flagship stores for a range of national and international brands on Oxford Street, including department stores such as Selfridges, Liberty, John Lewis and Marks & Spencer, as well as 'flagship' branches of major fashion and lifestyle brands. Regent Street and nearby Bond Street are home to higher-end brands.
- Specialist brands in Covent Garden, Soho and Carnaby Street, with a focus on boutique clothing, footwear and lifestyle stores.
- Furniture and design stores on Tottenham Court Road, including flagship branches of Paperchase, Habitat and Heal's.

1.4.5.1.4 Central London also has an extensive, long-standing commercial leisure offer which draws visitors from across London, the UK and the world. Its range of theatres, dance and opera venues, live music venues, art galleries and exhibition spaces is world-renowned. Supporting this leisure offer is a vast array of restaurants, bars, coffee shops and hotels.

1.4.5.1.5 Investment in both the retail and commercial leisure sectors remains strong, with a regular stream of new openings. The imminent arrival of Crossrail is providing considerable stimulus for the regeneration of the eastern end of Oxford Street with modern new retail floorspace and offices, and recent new openings such as the redeveloped Plaza Shopping Centre as a flagship Next store. The Mayor of London has identified an aspiration to pedestrianise Oxford Street in a phased series of works, although these have been the subject of objections from Westminster City Council.

#### **1.4.5.2 Stratford (Metropolitan Town Centre, LB Newham/LLDC)**

1.4.5.2.1 Stratford is identified as a 'Metropolitan' town centre in the Draft New London Plan (DNLP), which also identifies Stratford as having potential future classification as an 'International' centre. The DNLP also identifies Stratford as a Strategic Area for Regeneration, as well as having 'high' commercial and residential potential. The centre is highly accessible by a range of Underground, national rail, DLR and bus connections, and will in the near future benefit from enhanced connections as a result of the Elizabeth Line.

1.4.5.2.2 Stratford lies on the border between LB Newham (which covers the 'historic' town centre) and the London Legacy Development Corporation (LLDC) (which covers the Queen Elizabeth Olympic Park and the 'new' town centre, i.e. Westfield Stratford City and related development). The boundary of Stratford Metropolitan town centre extends across both administrative areas.

1.4.5.2.3 It is clear that Westfield Stratford City (WSC) has been a major success since it opened in 2011, hosting over 300 units. WSC is 'anchored' by two large department stores -- John Lewis and Marks & Spencer. These stores are supported by a wide range of mid-market 'high street' fashion retailers such as Topshop/Topman, Zara, Primark, Urban Outfitters, Uniqlo, H&M, River Island, Pull & Bear and so on, alongside more premium retailers such as Cos, Hobbs, All Saints, Diesel, Hugo Boss, Jo Malone and The White Company. The convenience offer of WSC is anchored by a Waitrose supermarket (approximately 3,000 sq. m net sales) and an M&S food hall within the M&S department store. Over 20% of the units in WSC are occupied by leisure operators, with the offer including a 17-screen Vue Cinema, All Star Lanes bowling venue, Casino, Gymbox, and a wide array of drinking and dining establishments, again predominantly operated by national or international operators.

1.4.5.2.4 The LLDC published a 'Retail Needs Assessment' in 2018 which included a 'health check' assessment of the vitality of Stratford town centre. It found that the centre offers a 'broad spectrum' of comparison and convenience goods retailing, with a clear, complementary role between the two parts of the town centre. The study also concluded that the opening of WSC has led to a significantly strengthened retail services offer, particularly food & beverage. Vacancy rates are low and there are positive levels of demand from retail and services operators.

1.4.5.2.5 Stratford town centre's already strong levels of vitality and viability will be enhanced further through planned development which will further diversify and strengthen its offer. These include the partial redevelopment and

extension of the Stratford Centre, and the development of a vacant site next to WSC known as Cherry Park for a 10,476 sq.m 'anchor' non-food retail store; both of these developments have planning permission. A proposed 'Phase 2' extension of WSC remains undetermined but will, if approved, deliver a further 75 new retail units/14,500 sq.m of new retail floorspace.

#### **1.4.5.3 Angel (Islington) (Major Town Centre, LB Islington)**

1.4.5.3.1 Angel is classified in the London Plan as a 'major' town centre, and has a strong retail and leisure offer, particularly in respect of its high-end fashion retail offer. It is served by direct connections with the application site via bus route 205 (Paddington to Bow Church). The comparison (non-food) offer is particularly strong, focussed around the Angel Central shopping centre (formerly known as the N1 Centre), which opened in 2002, as well as Upper Street, Chapel Market and Camden Passage:

- Angel Central includes stores such as H&M, Gap, Muji, Paperchase, Flying Tiger and Argos, along with a wide range of casual dining restaurants (e.g. Wagamama, GBK), the O2 Islington Academy music venue and a Vue cinema at upper levels. In 2015 CBRE acquired Angel Central and have identified plans to refurbish and enhance the physical environment, and to introduce further flagship stores and restaurants within key locations within the centre.
- Upper Street hosts recognised national and regional multiple retailers to the south (i.e. closest to Shoreditch) and higher-end fashion and homewares stores to the north (at the Highbury end), including brands such as Whistles, Jigsaw, Farrow & Ball, Aesop, Malin + Goetz and Oliver Bonas.
- Chapel Market is home to a daily street market alongside a mixture of more day-to-day retailers (e.g. Iceland, Superdrug), pubs and cafes, whilst Camden Passage accommodates specialist antiques shops and independent retailers.

1.4.5.3.2 Angel's convenience goods offer is also strong, and again geared towards the upper-end of the market. Retailers present include M&S Foodhall, Sainsbury's and Waitrose stores on Liverpool Road, and a branch of Planet Organic on nearby Essex Road, alongside several specialist independent food retailers. Angel also has a vibrant and diverse evening economy, with a wide range of pubs, bars, restaurants. These sit alongside the aforementioned Vue cinema, an independent cinema (The Screen on The Green), live music venues (Islington Assembly Hall, O2 Academy Islington and the Union Chapel) and theatres (The Almeida and the King's Head). The centre therefore clearly offers a healthy, diverse range of uses which enable it to function as a strong-performing daytime and evening destination.

#### **1.4.5.4 Dalston (Major Town Centre, LB Hackney)**

1.4.5.4.1 Dalston town centre is located to the north of the application site, and is the highest-order centre serving the London Borough of Hackney, classified as a 'major' town centre. It is directly accessible from the application site via London Overground services from Shoreditch High Street to Dalston Junction or several bus routes running north-south along Kingsland Road.

1.4.5.4.2 Dalston has a retail offer which is orientated towards discount/value retail, together with having a strong emphasis on specialist ethnic food and non-food retailing. The Kingsland Shopping Centre and Ridley Road Market are the two key drivers of footfall in the centre and act as its main focal points; the former of these including a large Sainsbury's supermarket as its 'anchor', whilst the latter plays a vital role in meeting residents' fresh food shopping needs. Other retailers present in the centre include Boots, Argos, Tesco Express, Poundland, JD and Superdrug. An M&S Foodhall has recently opened as part of the new 'FiftySevenEast' development adjacent to Dalston Kingsland station, which has also benefited from recent investment.

1.4.5.4.3 Dalston also has an independent cinema, theatre, a number of cafes and restaurants, and is particularly well known for being home to a number of small specialist live music venues, such as Cafe Oto, Servant Jazz Quarters, Vortex and Birthdays. The centre has also benefited from investment in its public spaces in recent years, such as Gillett Square and Dalston Square, which have helped improve the overall environmental quality of the centre.

1.4.5.4.4 There is an area of land to the rear of the Kingsland Shopping Centre which has been long-identified as a potential development opportunity, as its current uses (a Matalan store and car park) offer scope for intensification. We have considered this site in further detail as part of our sequential assessment.

#### **1.4.5.5 Hackney Central (District Centre, LB Hackney)**

1.4.5.5.1 Hackney Central is classified as a 'district centre', containing a strong mix of comparison and convenience goods retailers. The three long-standing 'anchor' stores of Primark, M&S and Tesco have recently been joined by a fourth, TK Maxx, as part of a new development adjacent to Hackney Central Overground station. The 'Hackney Walk' development, a high-end fashion designer outlet centre predominantly set in twelve railway arches which opened in 2017, has provided further diversification of the town centre's retail offer, although there is scope for better integration of this development with the wider town centre offer. The LB Hackney Retail & Town Centre

identified that Hackney has strengthened its role as a comparison goods shopping destination over the past decade, and now attracts a higher comparison goods turnover than that of nearby Dalston.

- 1.4.5.5.2 Hackney Central also has an important civic and cultural role, being home to Hackney Council's offices, Hackney Town Hall, a popular Picturehouse cinema, the Hackney Empire and a National Trust property, Sutton House. Reflecting its diverse retail, civic and cultural uses, Annex 2 of the Draft New London Plan (2018) proposes a reclassification upwards of Hackney Central to a 'major' town centre.
- 1.4.5.5.3 The centre has been subject of significant recent investment in the upgrading of public realm along the centre's main pedestrianised thoroughfare, Narrow Way. There are two major development opportunities in the town centre identified in the Hackney Retail & Town Centre Study, which if developed will offer the opportunity for a further strengthening of the town centre's performance.

#### **1.4.5.6 Conclusions**

- 1.4.5.6.1 The analysis set out above indicates that the existing network of centres within the 1km radius of the application site all benefit from positive levels of vitality and viability, and many have unique selling points and multiple attractors which ensure they benefit from a diverse customer base throughout the daytime and evening. The application scheme will provide a positive enhancement to the adjacent Brick Lane district centre, improving its diversity of uses and assisting in the creation of a strong retail circuit linking Brick Lane, Spitalfields and Shoreditch.
- 1.4.5.6.2 Further afield, Angel, Dalston and Hackney are all strong performing centres. Angel has a strong comparison, convenience and evening economy retail function, supported by specialist and independent retail clusters. Dalston and Hackney provide a more localised day-to-day shopping function, with a low to mid-range retail offer. Both have benefitted from recent major investment and have clearly identified town centre development opportunities with which to leverage future investment and change. Hackney Central is identified in the London Plan as having the opportunity to take a step change upwards in the retail hierarchy to become a Major town centre over the plan period.

# THE GOODSYARD

## 5.0 SEQUENTIAL ASSESSMENT

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## 1.5 SEQUENTIAL ASSESSMENT

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- 1.5.1 The NPPF requires applications for main town centre uses which are not in an existing centre and not in accordance with an up to date development plan to undertake a sequential approach to site selection. This means, wherever possible, seeking to focus new development within, or on well-located sites on the edge of existing defined town centres. The requirements of the sequential test are set out at paragraphs 86-88 of the NPPF (2019).
- 1.5.2 The application site is allocated for a mix of uses including retail in existing and emerging LBH and LBTH policy document, and the eastern part of the site falls within the policy boundary of the defined district centre at Brick Lane. The site is located within the London Plan CAZ, an area where the provision of enhanced and additional retail floorspace is supported in principle, and also within the Shoreditch Retail Cluster – a defined town centre classification in Annex 1 of the Draft London Plan.
- 1.5.3 The development of retail on the site is considered to be in accordance with an up to date development plan, and therefore a sequential assessment is not required.

### 1.5.4 Key Sequential Considerations

- 1.5.4.1 There are several key considerations which must be taken into account as part of the sequential assessment. These include:
- Retail uses on the site are supported on the site in principle, across both the LBH and LBTH adopted and emerging Development Plans – the draft versions of which are at the advanced stage of preparation;
  - In accordance with planning policy, retail floorspace is required on site in order to activate the ground floor of the site;
  - Existing retail uses at The Goodsyard site demonstrate that retail uses on the site are acceptable and suitable uses in principle;
  - The proposed revised retail floorspace is integral to the comprehensive mixed-use redevelopment of the site, and cannot – and is not required to be – disaggregated from the residential and commercial uses proposed;
  - The proposals seek to create a new retail hub and destination within the CAZ to serve a mix of residents, workers and tourists who already visit the area, and also the proposed increase in each visitor group arising as a result of committed developments in the local area. The proposed quantum of retail and leisure floorspace is necessary to provide a sufficient critical mass to draw shoppers to the development and provide a different and complementary offer to existing district centres; and
  - The proposed retail floorspace comprises a mix of units of different scales in order to meet tenant requirements and attract a diverse mix of aspirational and debut retailers.

### 1.5.5 Approach to flexibility

- 1.5.5.1 The NPPF requires applicants to demonstrate flexibility on issues such as format and scale. The Supreme Court Judgement in the Dundee case is a key consideration in assessing the sequential approach to site selection. The Judgement confirms that the sequential approach must be applied for use in the ‘real world’. The question is “whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site”. The judgement confirms that the issue of suitability is directed to the developer’s proposals and not some alternative scheme which might be suggested by the local planning authority.
- 1.5.5.2 The existing development proposals include up to 19,547 sq m (GEA) class A retail floorspace (A1/2/3/5), alongside other uses and the site extends to over 4 hectares. In order to demonstrate flexibility, we have tested potential sequential sites which would be capable of accommodating a mixed-use scheme including at least 15,000 sq.m (GIA) class A1 retail floorspace on a site of at least 2 hectares to allow for servicing and access arrangements. This consistent with the approach adopted to considering ‘flexibility’ in the 2015 Assessment; and notwithstanding the small reduction in the total quantum of class A floorspace now proposed in the revised application, it is considered that this remains an appropriate level of flexibility. We have assessed sites within centres within 1.5km radius from the application site.

### 1.5.6 Alternative sites

#### 1.5.6.1 Liverpool Street/Bishopsgate (CAZ Retail Cluster)

- 1.5.6.1.1 Liverpool Street/Bishopsgate is identified as a ‘Principal Shopping Centre’ by the City of London, and is also defined as a CAZ Retail Cluster. There are no sites within the defined Principal Shopping Centre frontage (City of



London Proposals Map, 2015) which could accommodate the proposed development, including when adopting a flexible approach.

#### **1.5.6.2 Angel (Major town centre)**

- 1.5.6.2.1 The 2015 Assessment considered sites which have been allocated for development for retail use in London Borough of Islington's Site Allocations DPD, which was published in 2013. LB Islington are currently preparing a new Local Plan and have undertaken a 'call for sites' to inform this document, but no further up to date schedule of site allocations has yet been published subsequent to the 2013 DPD. In considering the 2013 DPD, the 2015 Assessment identified that 'all of the sites within the DPD are considered to be too small to accommodate the proposed scale of retail floorspace, even at a reduced scale, and therefore none of the sites are considered to be suitable or viable to accommodate the proposed development'.
- 1.5.6.2.2 Notwithstanding this conclusion, the 2015 Assessment undertook an assessment of the two largest sites in the DPD allocated for retail uses. These sites were the former Royal Mail North London Mail Centre and Sorting Office on Almedia Street (off Upper Street), and the Royal Bank of Scotland offices on Islington High Street, adjacent to Angel LUL Station.
- 1.5.6.2.3 Subsequent to the publication of the 2013 DPD (and the submission of the 2015 Assessment), both of these sites have come forward for development:
- The former Royal Mail site is being developed as 'Islington Square', a development of 263 homes, 108 serviced apartments and c. 1,600 sq.m of retail and leisure floorspace at ground floor level, with initial tenants such as 'The Lounge by Odeon' luxury cinema and fashion retailer Cos already confirmed. Construction of the development is well advanced and it is clear that the site is not 'available' for development.
  - The Royal Bank of Scotland offices remain in active use, and some of the floorspace has been sub-let to other companies. The building is therefore not 'available' for development. Planning permission was granted by LB Islington in 2017 for major improvements to the facade of the building, which have subsequently been implemented.
- 1.5.6.2.4 We are not aware of any other sites within or on the edge of Angel town centre which represent suitable development opportunities.

#### **1.5.6.3 Kingsland Shopping Centre, Dalston Town Centre**

- 1.5.6.3.1 Kingsland Shopping Centre is a long-identified development opportunity, occupying a prime position in the town centre and currently acting as the focus of the centre's shopping offer. The site extends to cover the area currently occupied by the shopping centre itself, including the large anchor Sainsbury's store, as well as an area of land to the rear (eastern end) of the site which is occupied by a surface car park and a Matalan retail warehouse store. In total, the area of the site extends to approximately 2.6ha.
- 1.5.6.3.2 The Dalston Area Action Plan (2013) notes that the Council is seeking the comprehensive redevelopment of the site for a mixture of retail and residential uses. Proposals for the redevelopment of the centre released in 2013 which involved a high-density redevelopment of the site have not progressed.
- 1.5.6.3.3 The Hackney Retail & Town Centres Study (HRTCS) (2017) also identifies the development potential of the site, identifying that the site could, along with two identified opportunity sites in Hackney Central district centre (discussed below) accommodate the identified 'need' for comparison goods floorspace for London Borough of Hackney over the period to 2027. The HRTCS also identified that any future redevelopment of the Kingsland Centre would need to take into consideration that the proposed route of Crossrail 2 passes through part of the Kingsland Centre site, and that TfL consider that Dalston would be a suitable location for a new station on the proposed line. The study therefore advises that 'it may be case that redevelopment of the Kingsland Centre is not able to come forward until later in [the Council's Local Plan] period whilst proposals for Crossrail 2 continue to evolve'.
- 1.5.6.3.4 The centre remains in active use throughout, with high levels of occupancy across its units and a strong-performing Sainsbury's store which acts as one of the 'anchor' stores in Dalston town centre. The HRTCS identified the Sainsbury's store to be trading strongly, with a turnover some £22m above company 'benchmark' levels. Whilst the site is clearly dated and offers scope for intensification given its central location within Dalston and proximity to public transport (in other words it is 'suitable' for the type of development proposed by the application scheme), it is evidently not 'available' for development at the current time.

#### **1.5.6.4 Western and Eastern Curve Sites**

- 1.5.6.4.1 The Western and Eastern Curve sites are centred around Kingsland High Road and Dalston Lane, and comprise numerous sites which are identified in the Dalston AAP to provide a mix of complementary town centre retail, leisure, employment and open spaces. Subsequent to the publication of the AAP, the sites which together comprise the Dalston Western Curve have been developed for residential use with commercial units at ground floor level, the majority of which have been occupied. The Dalston Eastern Curve site, meanwhile, was granted

planning permission for a mixed-use residential and commercial development in June 2018. On this basis, neither site can be considered 'available' for development.

- 1.5.6.4.2 We are not aware of any other sites within or on the edge of Dalston town centre which could accommodate the proposed development, having regard for the requirement to demonstrate flexibility.

#### **1.5.6.5 Hackney Central (District Centre)**

- 1.5.6.5.1 Hackney Central is 3.5km from the application site and will therefore have a materially different catchment and user base to that of Shoreditch and the proposed development. Whilst we would therefore consider Hackney Central to be outside a realistic 'area of search' for alternative sites, for completeness we provide an updated appraisal of the sites previously considered in the 2015 Assessment – the Clapton Bus Garage site and Tesco foodstore on Morning Lane, both of which fall within the policy-defined boundary of Hackney Central district centre.

#### **1.5.6.6 Clapton Bus Garage**

- 1.5.6.6.1 The Clapton Bus Garage site is one of two sites identified in the Hackney Central Area Action Plan (AAP) (2012) as being suitable for use. It is also identified as an opportunity site in the Hackney Council's Site Allocations Local Plan (2016) and the Hackney Central & Surrounds Masterplan SPD (2017). The site is also identified in the Hackney Retail & Town Centre Study (HRTCS) as offering potential for retail use, the study noting that 'the proximity of the site to primary retail area in the district town centre means this site could act as a natural extension to the existing retail and commercial offer were it to come forward for development... The site's location adjacent to Hackney Central Overground station means there is scope for a substantially higher density development to come forward on the site than that which currently occupies it'. The site is therefore likely to be acceptable for the type of uses proposed by the application scheme.

- 1.5.6.6.2 However, the boundary of the site extends to just 0.7ha, and therefore it is too small to accommodate the proposed development, even when making allowance for a flexible approach. The site is also currently in use as a bus garage, and we are not aware of any current proposals for the relocation of these facilities. The site is therefore neither suitable for development (owing to its small size) or available for development within a reasonable period (as it remains in use).

#### **1.5.6.7 Tesco, Morning Lane**

- 1.5.6.7.1 The Tesco site at Morning Lane is the second allocation in the Hackney Central AAP in respect of sites suitable for retail use, and is again also identified as an opportunity site in Hackney Council's Site Allocations Local Plan (2016) and the Hackney Central & Surrounds Masterplan SPD (2017). The latter document identifies two options for the site - either a phased programme of site redevelopment, or a comprehensive approach necessitating the closure of the store during development works. Both options make provision for a redeveloped foodstore on the site together with a much more high-density development than currently exists. The Masterplan SPD suggests that a development of up to 421 residential units could be accommodated on the site, together with up to 16,480 sq.m of commercial floorspace.

- 1.5.6.7.2 The HRTCS also identifies the suitability of the site for retail uses, and highlights the importance of retaining a foodstore on the site given the positive contribution the existing Tesco makes to the overall 'vitality and viability' of Hackney Central district centre. In 2017, Hackney Council purchased the site to bring forward its redevelopment, however we understand no planning application has yet been submitted and the site continues to trade as a Tesco supermarket. The site is expected to come forward for development in the medium to long term, and is not currently 'available' for development.

- 1.5.6.7.3 In addition, the area of the site, at c. 1ha, is too small to accommodate the proposed development, and when having regards to the need to accommodate a replacement large-format foodstore identified in all of the Council's policy and evidence base documents, would further restrict the area which could be used to accommodate the quantum of floorspace proposed by the application, together with necessary access and servicing arrangements. It is therefore not considered suitable for development.

#### **1.5.6.8 Sites in district and local centres**

- 1.5.6.8.1 We have undertaken a high-level assessment of potential development opportunities in the centres in the lower-order district and local centres which are proximate to the application site - namely Columbia Road, Hoxton Street, Whitecross Street and Mile End. We have not identified any redevelopment sites within or on the edge of these centres which could accommodate the proposed development, including when making allowance for flexibility. The nature of these centres is that they are tightly constrained by surrounding built form, usually residential terraced properties. Vacant units within these centres are of a small size and therefore not capable of accommodating a comprehensive mixed-use scheme.

- 1.5.6.8.2 Moreover, these centres operate at a different level in the retail hierarchy, predominantly serving local day-to-day shopping needs (e.g. Mile End, Hoxton Street) or specialist shopping/destination (e.g. Columbia Road, where the vitality and viability of the centre is intrinsically linked to the weekly flower and plants market). Local centres are therefore not suitable locations for development of 'higher-order' shopping, particularly in respect of the



comparison goods shopping proposed by the application scheme, which is clearly more suited to larger District, Major and International centres, as well as appropriate other locations such as CAZ frontage. Introducing a development of the scale proposed would therefore be out of keeping with the centre's role and function in their respective boroughs' retail hierarchy, and that of the London Plan.

## **1.5.7 Conclusions**

- 1.5.7.1 We have provided a thorough assessment of alternative sequential sites within and on the edge of nearby policy-defined centres, acting as a full update to the equivalent assessment undertaken in the 2015 Assessment. There are no alternative sites which could accommodate the proposed development, including when adopting a flexible approach to site area and quantum of floorspace being development. The application therefore satisfies the requirements of the sequential test.

# THE GOODSYARD

## 6.0 IMPACT ASSESSMENT

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## 1.6 IMPACT ASSESSMENT

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- 1.6.1 The 2015 Retail Assessment included a full and detailed retail impact assessment based on a proposed comparison goods floorspace of 20,100 sq m GEA (maximum). The 2015 quantitative impact model is attached in Appendix 2. The findings concluded that there would be no significant adverse impacts arising on existing centres or future investment as a result of the development proposals. When considering the planning application and accompanying Retail Assessment, the Mayor did not raise the level and type of retail floorspace as a contentious issue or a reason for refusal. The levels of impact were not concluded to be significant.
- 1.6.2 The maximum level of comparison goods floorspace now being proposed has reduced from 20,100 sq m GEA (2015 Retail Assessment) to 19,547 sq m GEA. The levels of impact arising from the revised Bishopsgate Goodsyard proposals will therefore also lessen from that previously identified. The original retail floorspace proposed was concluded to be acceptable in impact terms, and the same must also be concluded for the revised scheme.
- 1.6.3 In the context of the planning policy framework, a full retail impact assessment is not, in any event, required. The site is allocated for mixed use redevelopment including retail, and is also located within a policy defined CAZ and the (draft) Shoreditch CAZ Retail Cluster, thereby achieving a town centre designation in the London Plan. At the request of LBTH and LBH we have, however, re-visited the 2015 retail impact assessment, updating inputs and assumptions where necessary and drawing up-to-date conclusions on the levels of impact arising.
- 1.6.4 This section sets out the impact assessment undertaken to support the proposed A1 comparison goods retail floorspace. The amended scheme seeks permission for a maximum comparison goods retail floorspace of 19,547 sq m GEA. The revised scheme does not include a convenience foodstore element and this part of the 2015 retail impact assessment has been excluded. In addition, an element of A2/3/5 floorspace is proposed. We assess the retail impact of these 'other' proposed retail uses within Section 7 of this report.

### 1.6.5 Key Data Inputs and Assumptions (2015)

- 1.6.5.1 A number of key data inputs and assumptions made in the 2015 Retail Assessment remain relevant, and have been carried forward into this up-to-date retail impact assessment. They were previously discussed and agreed with LBTH and LBH as part of the original application and 2015 revised proposals:
- The survey area used to inform the revised assessment is shown on the plan provided in Appendix 1. The survey area is divided into seven zones in order to provide a more detailed analysis of shopping patterns. The seven zones cover the central and western parts of LBTH and adjoining areas to the west of the application site in LB Hackney, LB Islington and City of London.
  - The proposed retail mix and offer is likely to perform a role which is commensurate with the site's location in the CAZ which serves both a local need as well as a substantial visitor and tourist market. Accordingly, we anticipate that the proposals will draw a significant element of spend from outside the survey area. Based on comparables and evidence discussed in Section 2 and 3, we estimate a 40% inflow.
  - In order to provide detailed information on shopping patterns in the local area, we draw on the specially commissioned household telephone survey. Interviewing and data processing was undertaken in December 2013, comprising 700 interviews across the seven survey zones.
  - The greatest trade draw of the proposed scheme will be derived from the West End and Westfield Stratford City. These are the two destinations that have the greatest influence on shopping patterns within the survey area. They have, however, significant catchment areas which extend well beyond the telephone survey area. When assessed against the total turnover that these centres achieve, the overall cumulative impact on these centres will be negligible.
  - Based on our understanding of current shopping patterns, we have assumed that the comparison goods turnover of the proposed retail floorspace (excluding inflow) will draw the majority of its trade from within Zone 1 (50%), 18% from within Zone 2, 12% from within Zone 7, 7% from within Zone 4, 6% from within Zone 3, 5% from within Zone 5 and 2% from within Zone 6. Due to our understanding of the nature of the proposed retail offer, we consider that the revised scheme will draw most of its trade from larger centres such as the West End and Westfield Stratford City, and will have a much smaller trade draw from smaller local centres.

### 1.6.6 Impact on Town Centre Vitality and Viability

#### 1.6.6.1 Population and Expenditure Forecasts

- 1.6.6.1.1 The NPPG states that the impact of a development proposal must be tested over a 5 year period, or 10 years for major schemes. The 2015 Retail Assessment forecast over the five year periods from 2013 to 2018, and 2018 to 2023 (Appendix 2). For the purposes of this updated quantitative impact assessment, we have drawn upon the

2015 Retail Assessment baseline and – given the passage of time – grown the population and expenditure forecasts from 2023 to the period 2028. This enables the analysis to test the impact of the Bishopsgate Goodsyrd over a 10 year period – from a 2018 baseline, rather than 2013 previously used.

- 1.6.6.1.2 Population forecasts bespoke to each survey zone were originally provided by Pitney Bowes MapInfo (see Table 1, Appendix 2). The outputs identified a population growth of 1.6% per annum across the survey area. Carrying the same level of growth forward, the forecasts identify a population growth of 54,123 between 2018 and 2028 (17% growth), reaching 328,936 by 2028.

**Table 6.1: Survey Area Population Growth 2013-2028**

|      | <b>Total Population Zone 1-7</b> |
|------|----------------------------------|
| 2013 | 305,502                          |
| 2018 | 328,813                          |
| 2023 | 353,901                          |
| 2028 | 382,936                          |

- 1.6.6.1.3 Expenditure forecasts utilised in the 2015 Retail Assessment were also drawn from Pitney Bowes MapInfo (Table 2, Appendix 2). The model deducted allowances for special Forms of Trading (SFT) to take into account internet shopping, vending machines, mail order and catalogue shopping in order to deduct any expenditure which is not being spent in shops and retail units.
- 1.6.6.1.4 The 2015 Retail Assessment identified that comparison goods expenditure is forecast to grow by 6.4% per annum between 2013 and 2023. Again, carrying the same level of growth forward, the forecasts identify a comparison goods expenditure growth of £871.2 million between 2018 and 2028 (77% growth). This longer term, average growth rate reflects a period of economic uncertainty and consequent conservative economic growth rates. The forecast growth set out is, as a consequence, conservative.

**Table 6.2: Survey Area Comparison Goods Expenditure Growth 2013-2028**

|      | <b>Total Comparison Goods Expenditure, Zone 1-7</b> |
|------|---|
| 2013 | £0.89 billion                                       |
| 2018 | £1.14 billion                                       |
| 2023 | £1.47 billion                                       |
| 2028 | £2.01 billion                                       |

## **1.6.6.2 Committed and Pipeline Retail Development**

- 1.6.6.2.1 The 2015 Retail Assessment factored into the analysis the likely impact of committed retail developments within the survey area (i.e. sites with extant retail planning consents). Large scale retail permissions comprising over 1,000 sq m of retail floorspace were included, and realistic assumptions were made about the likely proportion of floorspace to come forward within each committed development scheme. In addition, large pipeline development schemes were factored in, including major schemes which had received a resolution to grant consent, subject to signing a S106 agreement. The complete schedule, including nine schemes, is set out in Table 8a and 8b, Appendix 2, and a summary of turnover in 2023 and 2028 is set out in Table 6.3 below.
- 1.6.6.2.2 All nine schemes have been retained as planning commitments for the purpose of this updated retail impact assessment. The reason is twofold. First, many of these schemes remain in the pre-construction or construction phase and are not yet open for trading; and second, if schemes have been completed since 2015 and have recently opened open for trading, their influence on shopping patterns - and therefore also their claims on expenditure - have not yet been identified.
- 1.6.6.2.3 The major strategic committed and pipeline schemes will claim a proportion of the identified growth in comparison goods retail expenditure. It is evident from Table 6.3 that those schemes will claim £78.7m of comparison goods expenditure within Zones 1-7 in 2028. This equates to just 9% of the total growth (£871.2m) between 2018 and 2028. The committed schemes will absorb a very small proportion of growth, with the surplus (£793.4m) available to support the improved business efficiency of existing retail floorspace across the survey area and beyond.

**Table 6.3: Average Turnover of Committed Development 2023, Grown to 2028, as identified and set out in 2015 Retail Assessment**

| Average Turnover 2023 (£000) | Turnover from within Survey Area (£000) 2023 | Average Turnover 2028 (£000) | Turnover from within Survey Area (£000) 2028 |
|------------------------------|--|------------------------------|--|
| 157,626                      | 71,280                                       | 172,331                      | 78,650                                       |

Note: Schedule taken from 2015 Retail Assessment

1.6.6.2.4 For the purposes of the updated retail impact assessment, a number of new planning commitments have been added following an in-depth review of each respective evidence base prepared by LBH and LBTH. These committed schemes include:

**LBH Town Centre and Retail Study 2017:**

- 48-76 Dalston Lane, Hackney (Ref: 2012/1739);
- 84-86 Great Eastern Street / 1-3 Rivington Street, Shoreditch (Ref: 2015/1834);
- 21 Great Eastern Street, Shoreditch (Ref: 2015/2762);
- 1 Crown Place, Shoreditch (Ref: 2015/0877);
- 62 Paul Street, Shoreditch (Ref: 2011/3021);
- 145 City Road, Shoreditch (Ref: 2012/3259);
- Eagle House, 159-189 City Road, Shoreditch (Ref: 2008/1878).

1.6.6.2.5 Combined, the total net comparison goods floorspace totals 4,613 sq m, and will achieve a turnover in the region of £15.9m. Consistent with the 2015 Retail Assessment, and given geographic proximity and the wider catchment of workers and visitors/tourists, we assume each scheme will achieve 60% of their turnover from within Zones 1-7, with the remaining being drawn as 'inflow'. The commitments identified within LBH will claim c.£9.6m of comparison goods expenditure in 2028, equating to just 2% of the expenditure growth identified between 2018 and 2028.

**LBTH Retail Capacity Study 2016 (Appendix 7):**

- Wood Wharf (PA/13/02966) (15% trade claim);
- Hertsmere House (Ref: PA/08/02709) (15% trade claim);
- The Colt, Three Colts Lane (Ref: PA/11/03785) (60% trade claim);
- The Fusion, Brick Lane (Ref: PA/13/02529) (60% trade claim);
- Crossharbour (Ref: PA/11/03670; PA/10/01177) (10% trade claim);
- Baltimore Tower, Limeharbour, Crossharbour (Ref: PA/08/00504) (10% trade claim);
- Apart-Hotel, Watney Market (Ref: PA/14/03107) (60% trade claim);
- Aldgate Place, City Fringe (Ref: PA/13/00218) (60% trade claim);
- Goodmans Fields, City Fringe (Ref: PA/14/02817) (60% trade claim);
- Cobb Street, City Fringe (Ref: PA/14/01752) (60% trade claim);
- Redchurch Street, City Fringe (Ref: PA/15/00022) (60% trade claim);
- South Quay Plaza, Marsh Wall (Ref: PA/14/00944) (15% trade claim);
- London Docks, Virginia Street, nr Wapping (Ref: PA/13/01276) (60% trade claim).

1.6.6.2.6 Combined, the total net comparison goods floorspace totals 21,292 sq m, and will achieve a turnover in the region of £191.3m in 2028. Consistent with the 2015 Retail Assessment, those schemes within the proximity of the application site and City Fringe area, we have assumed each will achieve 60% of their turnover from within Zones 1-7, with the remaining being drawn as 'inflow'.

1.6.6.2.7 For those schemes identified in close proximity to Canary Wharf and Crossharbour, we have assumed a substantially lower trade draw from the survey area based on their location outside/on the edge of Zones 1-7 and their role and function. Crossharbour will be primarily local shopping, whilst evidence prepared by Canary Wharf for the LBTH draft Local Plan consultation demonstrates that the catchment area of the Canary Wharf retail estate spreads across the South East, wider UK and also abroad.

1.6.6.2.8 We conclude that the commitments identified in the LBTH evidence base will claim c.£36.8m of comparison goods expenditure in 2028, equating to just 5% of the expenditure growth identified between 2018 and 2028.

1.6.6.2.9 Combined, the commitments identified in the 2015 Retail Assessment and those set out in the most up-to-date evidence-based documents for LBTH and LBH, will draw c.£125m of comparison goods expenditure from within the survey area comprising Zones 1-7.

### 1.6.6.3 Turnover of the Amended Scheme

1.6.6.3.1 The 2015 Retail Assessment estimated that the Bishopsgate Goodsyards application proposals would have a retail turnover of approximately £90.5m in 2023. This was based on a maximum A1 comparison goods retail floorspace of 20,100 sq m GEA, a 75% net:gross ratio (15,075 sq m net), and a sales density of £6,000 per sq m net. Following a deduction for inflow, it was estimated that the proposed scheme would derive a retail turnover equating to approximately £54.3m at 2023 from the Zone 1-7 survey area.

1.6.6.3.2 The maximum level of comparison goods floorspace now being proposed has reduced from 20,100 sq m GEA (2015 Retail Assessment) to 19,547 sq m GEA. It is important to note that this is a 'worst case' scenario which relates to the maximum retail which could be provided on the Goodsyards site (Use Class A1/2/3/5). It is highly unlikely that the tenant mix will comprise 100% A1 comparison goods retail floorspace, with a more realistic scenario being a more balanced mix across the A Use Classes being proposed (A1/2/3/5). The impact of this maximum amount of retail floorspace will therefore be substantially less than that set out in the remainder of this section.

1.6.6.3.3 Based on the same assumptions, but a lower floorspace, the revised proposals will have a comparison goods turnover of c.£86.8m in 2028, with £52m being derived from within the Zone 1-7 survey area.

### 1.6.6.4 Comparison Goods Impact

1.6.6.4.1 The 2015 Retail Assessment tested the impact of retail planning commitments (£71.3m Survey Area Turnover) and the Bishopsgate Goodsyards proposal (£54.3m Survey Area Turnover) at 2023. When combined, this equated to a total survey area turnover of £125.6m.

1.6.6.4.2 This updated Retail Assessment tests the impact of all previous commitments from the 2015 Retail Assessment, grown to the new forecast year of 2028 (£78.7m). It also includes all current retail planning commitments identified in each respective evidence based study prepared by LBH and LBTH. The turnover of new commitments in the catchment area is estimated to be £46.4m in 2028; thereby equating to a total combined commitments turnover over of £125.10m.

1.6.6.4.3 Including the 2028 turnover of the Bishopsgate Goodsyards (£52m), this updated retail impact assessment has tested a combined 'commitments' and 'proposal' turnover of £177.1 – an uplift of £51.5m since the 2015 Retail Assessment.

1.6.6.4.4 Table 6.4 below compares the likely cumulative impact of the comparison goods proposal and all identified commitments as set out in the 2015 Retail Assessment (in 2023), and also in the revised forecast year of 2028 as updated in this Retail Assessment. Given our in-depth analysis of geographic proximity, type/mix of retail floorspace and consideration of inflow, the impact of proposals and commitments in 2028 has been apportioned to reflect that calculated in 2015. It is evident from Table 6.4 that the impact on each respective town centre – as considered acceptable in 2015 – has decreased over time to 2028; i.e. the impact on Dalston Zone 1-7 trade draw has fallen from 8.5% to 8.1%.

**Table 6.4: Impact on Trade Draw from Zones 1-7, 2023 and 2028**

|                           | <b>2023<br/>Turnover<br/>No<br/>Development<br/>Zone 1-7</b> | <b>2028<br/>Turnover<br/>No<br/>Development<br/>Zone 1-7</b> | <b>2023 Impact<br/>of<br/>Commitments<br/>and Proposed<br/>Development<br/>(£000)</b> | <b>2028 Impact<br/>of<br/>Commitments<br/>and Proposed<br/>Development<br/>(£000)</b> | <b>2023 Impact<br/>of<br/>Commitments<br/>and Proposed<br/>Development<br/>(%)</b> | <b>2028 Impact<br/>of<br/>Commitments<br/>and Proposed<br/>Development<br/>(%)</b> |
|---------------------------|--|--|---|---|--|--|
| West End                  | 304,551  | <b>415,972</b>   | -47,441   | -62,143   | -15.6%   | -14.9%   |
| Surrey Quays/Canada Water | 79,289   | <b>108,297</b>   | -2,039  | -2,671  | -2.6%  | -2.5%  |
| Dalston/Kingsland Road    | 39,963   | <b>54,584</b>  | -3,392  | -4,443  | -8.5%  | -8.1%  |
| Angel, Islington          | 110,905  | <b>151,480</b>   | -9,995  | -13,092   | -9.0%  | -8.6%  |
| Whitechapel               | 57,531   | <b>78,579</b>  | -2,122  | -2,780  | -3.7%  | -3.5%  |

|                            |         |                |         |         |        |        |
|----------------------------|---------|----------------|---------|---------|--------|--------|
| Stratford (Exc. Westfield) | 52,549  | <b>71,774</b>  | -1,138  | -1,491  | -2.2%  | -2.1%  |
| Westfield Stratford City   | 156,280 | <b>213,456</b> | -19,347 | -25,342 | -12.4% | -11.9% |
| Mile End                   | 35,349  | <b>48,282</b>  | -1,352  | -1,771  | -3.8%  | -3.7%  |
| Hackney Central            | 36,073  | <b>49,270</b>  | -2,281  | -2,988  | -6.3%  | -6.1%  |
| Canary Wharf               | 37,940  | <b>51,820</b>  | -4,365  | -5,718  | -11.5% | -11.0% |
| Beckton                    | 31,269  | <b>42,709</b>  | -236    | -309    | -0.8%  | -0.7%  |
| Lakeside                   | 32,975  | <b>45,039</b>  | -989    | -1,295  | -3.0%  | -2.9%  |
| Beckton Retail Parks       | 57,251  | <b>78,197</b>  | -3,317  | -4,345  | -5.8%  | -5.6%  |
| Tottenham Retail Parks     | 32,795  | <b>44,793</b>  | -1,556  | -2,038  | -4.7%  | -4.6%  |

- 1.6.6.4.5 It is important to note that those figures set out in Table 6.4 are 'worst case' impact, and in reality the impact on existing large centres will be significantly reduced. The results of the household telephone survey do not capture the full catchment area for any of the town centres taking into account scale, location and visitor catchment. The turnover of all town centres will be greater than the trade draw from Zones 1-7 identified in Table 6.4. The figures in Table 6.4 only identify the impact on the proportion of the centre's turnover which is derived from the survey area.
- 1.6.6.4.6 As set out earlier, comparison goods expenditure within the Zone 1-7 Survey Area is forecast to grow by £871.2m between 2018 and 2028. This is substantially greater than the combined turnover of all commitments and the Bishopsgate Goodsyards (£177.1m), enabling expenditure growth to mitigate impact of the 10 year period as identified in Table 6.4.
- 1.6.6.4.7 A further analysis demonstrates that every town centre is able to more than improve their business efficiency and turnover from 2023 growing 1.5% per annum – even when factoring in all commitments and proposals. This output is set out in Table 6.5 below.
- 1.6.6.4.8 The findings of this updated retail impact assessment are entirely consistent with the Experian Expenditure and Comparison Goods Floorspace Need in London Report (2017) referenced in earlier sections. The document explains that 'taking into account projected growth in household, commuter and tourist spending, retailers making more efficient use of existing space, and special forms of trading, it is estimated that London could have a baseline need for additional comparison goods retailing of around 1.6 million sq m over the period 2016-2041, or 1.2 million sq m when current schemes in the planning pipeline are taken into account'. It adds that the CAZ is projected to have demand for approximately 375,000 sq m of additional comparison goods retail floorspace over the period 2016-2041 – after the committed pipeline of retail development is taken into account.
- 1.6.6.4.9 This level of floorspace need identified within the CAZ is broadly the equivalent of four shopping malls the scale of Westfield Stratford City. The evidence demonstrates the significant amount of need for additional comparison goods floorspace across London, and the CAZ.
- 1.6.6.4.10 The evidence and analysis confirms that the Bishopsgate Goodsyards will not have a quantitative impact on the network of town centre, and will instead have a positive impact on the Shoreditch 'Retail Cluster' through the creation of a differentiated retail hub and a retail circuit from Spitalfields to the south, northwards along Brick Lane, and westwards to The Goodsyards, and also through to Shoreditch High Street to the east. The development proposals will have a positive impact on the Shoreditch Area as supported in the London Plan and local Development Plans.



**Table 6.5: Turnover growth through business efficiency 'v' turnover following cumulative impact and expenditure growth**

|                              | Baseline Zone 1-7<br>Trade Draw<br>2023 (£000) | Baseline Zone 1-7<br>Trade Draw<br>2028 (£000) | 2023 Baseline Grown<br>1.5% Per Annum to<br>2028 (£000) | Turnover following<br>impact of<br>Commitments and<br>Proposal in 2028<br>(£000) |
|------------------------------|--|--|---|--|
| West End                     | 304,551  | <b>415,972</b>                                 | 328.1   | 353.8  |
| Surrey Quays/Canada<br>Water | 79,289   | <b>108,297</b>                                 | 85.4  | 105.6  |
| Dalston/Kingsland Road       | 39,963   | <b>54,584</b>                                  | 43.1  | 50.1   |
| Angel, Islington             | 110,905  | <b>151,480</b>                                 | 119.5   | 138.4  |
| Whitechapel                  | 57,531   | <b>78,579</b>                                  | 62.0  | 75.8   |
| Stratford (Exc. Westfield)   | 52,549   | <b>71,774</b>                                  | 56.6  | 70.3   |
| Westfield Stratford City     | 156,280  | <b>213,456</b>                                 | 168.4   | 188.1  |
| Mile End                     | 35,349   | <b>48,282</b>                                  | 38.1  | 46.5   |
| Hackney Central              | 36,073   | <b>49,270</b>                                  | 39.9  | 46.3   |
| Canary Wharf                 | 37,940   | <b>51,820</b>                                  | 40.9  | 46.1   |
| Beckton                      | 31,269   | <b>42,709</b>                                  | 33.7  | 42.4   |
| Lakeside                     | 32,975   | <b>45,039</b>                                  | 35.5  | 43.7   |
| Beckton Retail Parks         | 57,251   | <b>78,197</b>                                  | 61.7  | 73.9   |
| Tottenham Retail Parks       | 32,795   | <b>44,793</b>                                  | 35.3  | 42.8   |

1.6.6.4.11 The 2015 Retail Assessment concluded that the proposed retail floorspace would not have an impact on the network of town centres. This was considered and concluded to be acceptable by the Mayor of London. The updated analysis demonstrates that strong growth in comparison goods expenditure will mitigate impact over the forecast period to 2028, and also allow town centres to grow and enhance their performance above required levels of business efficiency.

## 1.6.7 Impact on proposed and committed developments

1.6.7.1 The NPPF requires applications for retail development to assess the proposed impact of the development on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal.

1.6.7.2 It is acknowledged that there are planned development proposals with extant consents for future retail floorspace, identified as committed developments in the retail impact assessments. The majority of these committed developments are formed of large scale mixed use developments, which include an element of retail floorspace. In these instances commercial office floorspace is the main driver behind the development, and we do not consider that the proposed development at The Goodsyard would prejudice or undermine such developments coming forward.

1.6.7.2.1 It is envisaged that the forthcoming developments within the vicinity of the application site will seek to reinforce the emerging retail hub and the proposals will enhance linkages between the development sites and existing centres, thereby creating a mutually beneficial impact in terms of increased pedestrian flow and visitor numbers. These extant consented developments have been factored in to the impact assessment.

1.6.7.2.2 There are also large scale retail developments coming forward at Westfield Stratford City and Canada Water / Surrey Quays as part of large scale retail expansion plans which are in accordance with the development plan. These areas are already strong performing retail destinations, with wide catchment areas, with Surrey Quays



mainly extending south of the river. Given the level of expenditure growth and findings from the updated impact analysis it is evident that the proposed scheme would not prejudice these sites coming forward for development, and would only have a negligible impact.

- 1.6.7.2.3 On the basis that the proposals will attract expenditure from a wide catchment area, the proposed scheme has the potential to substantially increase the inflow of expenditure to the local area. This will generate additional capacity to support the level of floorspace proposed and will also have the impact of generating sufficient surplus of locally generated capacity to support continued investment in nearby local centres such as Bethnal Green, Mile End, Whitechapel and Dalston. Accordingly, there will be an overall beneficial impact on other planned investment within the catchment area of the proposal.

## **1.6.8 Summary**

- 1.6.8.1 The findings of the 2015 Retail Assessment concluded that there would be no significant adverse impacts arising on existing centres or future investment as a result of the development proposals. When considering the planning application and accompanying Retail Assessment, the Mayor did not raise the level and type of retail floorspace as a contentious issue or a reason for refusal. The levels of impact were not concluded to be significant.
- 1.6.8.2 The maximum level of comparison goods floorspace now being proposed has reduced from 20,100 sq m GEA (2015 Retail Assessment) to 19,547 sq m GEA. The original retail floorspace proposed was concluded to be acceptable in impact terms, and the same must also be concluded for the smaller, revised level of floorspace.
- 1.6.8.3 In the context of the planning policy framework, a full retail impact assessment is not, in any event, required. The site is allocated for mixed use redevelopment including retail, and is also located within a policy defined CAZ and the (draft) Shoreditch CAZ Retail Cluster, thereby achieving a town centre designation in the London Plan.
- 1.6.8.4 This updated retail impact assessment has tested the combined turnover of all identified commitments and The Goodsyrd development proposals; equating to an uplift in turnover of £51.5m. Nevertheless, it is evident that levels of impact will actually fall over the forecast period to 2028 based on the strong growth in consumer expenditure over the same time period.
- 1.6.8.5 The findings are consistent with the Experian Consumer Expenditure Report for London which confirms a need for 375,000 sq m of comparison goods floorspace across the CAZ after all development proposals are taken into consideration. This is broadly equivalent to four shopping malls the scale of Westfield Stratford.
- 1.6.8.6 Overall, the analysis clearly demonstrates that in the context of the CAZ and the nature of the proposed retail offer there would not be any significant adverse impacts arising in terms of in centre trade/turnover, town centre vitality and viability, and existing/committed/planned investment. Moreover, there are significant positive benefits associated with The Goodsyrd proposals in terms of significantly improving and widening the retail offer in the local area and providing local job opportunities.
- 1.6.8.7 On the basis of the above, it is considered that the proposals are compliant with the requirements of the NPPF.

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## 1.7 ASSESSMENT OF OTHER RETAIL USES

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1.7.1 In this section we provide an assessment of the non-A1 retail floorspace which is proposed by the application, i.e. class A2, A3 and A5. Unlike for A1 retail, there is no method of providing a conventional impact assessment and trade diversion analysis for these use classes, and therefore in this section we set out a qualitative analysis of the potential impacts of the proposed class A2, A3 and A5 uses.

### 1.7.2 Existing service retail floorspace at the application site

1.7.2.1 The application site currently has an important service function, with the upper level of the existing Boxpark Shoreditch development (together with a small number of ground floor units) occupied by class A3, A4 and A5 retail uses. Since Boxpark Shoreditch first commenced trading, the amount of floorspace within the scheme given over to service units has increased, reflecting the changing nature of operator requirements within the development:

- In 2013, a variation of condition to the original planning application for the Boxpark development (LBH reference 2011/0255) to increase the maximum number of A3 units in the scheme from 12 to 16 was approved by LB Hackney (LBH application ref 2013/0573).
- In 2015, a variation of condition to the original planning application for the Boxpark development to extend the period of consent for the development until 31/05/2021 was granted (LBH application ref 2015/3443)
- In 2017, a variation of condition to application 2015/3443 was approved, to further increase the number of class A3 units within the scheme from 16 to 20. The application also sought to introduce glazed screen to the terraces at first floor level, and the installation of a polycarbonate roof over the central two terraces at the first floor level, which is entirely given over to food & beverage uses. The application has been implemented in full.

1.7.2.2 Currently therefore, 20 of the containers, or 36% of the total number of containers at Boxpark Shoreditch, are in use for service retail. All are currently occupied by class A3 retailers. These uses assist with providing diversity to the development, and enhancing its appeal as a shopping and leisure destination throughout the daytime and evening, including providing more opportunities for linked trips with the wider surrounding area.

### 1.7.3 Existing provision in the surrounding area

1.7.3.1 The wider surrounding area is firmly established as a mixed-use retail location, and class A2-A5 uses are prevalent throughout Bishopsgate, Spitalfields, Shoreditch, Whitechapel, Hoxton and Brick Lane. These areas which surround the application site are all immensely popular as evening and night-time destinations, with Shoreditch/Hoxton in particular playing an increasingly developed role in this respect in recent years. The opening of locations such as Shoreditch House, the Ace Hotel and Citizen M in close proximity to the application site reinforces the fact that Shoreditch is an important destination for the visitor economy and tourists as much as it is to local residents and Londoners.

1.7.3.2 In terms of existing non-A1 retail uses in the surrounding area:

- Shoreditch and Hoxton act as a particular a focus for bars and restaurants, with concentrations of these along Shoreditch High Street, Old Street and Hoxton Square, including popular restaurants such as Pizza East, Dishoom, Brindisa and Flat Iron, alongside a wide range of bars and pubs, nightclubs (e.g. Cargo) and gig venues (e.g. Village Underground).
- Brick Lane is a well-established destination for Indian restaurants and a number of more specialist facilities such as All Star Lanes bowling. There is an independent cinema, Rich Mix, located at the top of Brick Lane on Bethnal Green Road.
- Spitalfields' non-A1 retail uses are generally more orientated towards the daytime and early-evening economy, with a selection of cafes and restaurants, including a recently-opened new street food court within Old Spitalfields Market.

### 1.7.4 Proposed class A2, A3 and A5 uses at the application site

1.7.4.1 The application scheme is, in common with previous proposals, intended to be a retail-led scheme; it is therefore anticipated that the majority of floorspace at the application site will be for class A1 use. Reflecting the need for a diverse scheme which will be animated and draw footfall at all times of the day, the applicant is seeking a flexible consent for up to up to 40% of the proposed floorspace as class A2, A3 and A5 uses. As explained below the intention is for the majority of this floorspace allowance to be occupied by A3 operators.

## 1.7.5 Current patterns of leisure visits

- 1.7.5.1 The 2015 application was supported by a household survey which considered patterns of usage of leisure visits across Shoreditch and wider surrounding area. Whilst no new household survey has been instructed as part of this updated assessment, the findings of the 2015 survey are considered to remain robust as none of the destinations within the local area have seen a material change in their role, function or commercial leisure offer in the intervening period.
- 1.7.5.2 The 2015 survey found the most popular destinations for different types of commercial activity for residents in the survey area to be as shown in the table below. The table shows that Shoreditch does not currently feature in the top three most popular locations for daytime or evening dining, or for evening drinking, for local residents - despite having a strong existing offer. The application scheme therefore offers an opportunity for some of this loss of market share to be re-captured, to the benefit of the wider local area.

**Table 7.1: Most Popular Destinations for Leisure Uses**

|                              | Daytime dining     | Evening dining    | Evening drinking             |
|------------------------------|--------------------|-------------------|------------------------------|
| Most popular                 | Angel (11%)        | Angel (11%)       | West End (10%)               |
| 2 <sup>nd</sup> most popular | Bethnal Green (9%) | West End (10%)    | Angel (10%)                  |
| 3 <sup>rd</sup> most popular | West End (8%)      | Canary Wharf (8%) | Hackney / Canary Wharf (=9%) |

*Source: Household survey results*

- 1.7.5.3 The results of the telephone survey also identified that centres only attract 30% of people which live within the telephone survey area, for both locations within the CAZ (Liverpool Street and Spitalfields), as well as centres outside the CAZ (Dalston). The findings of the telephone survey therefore reinforces other research that areas in central London are subject to high levels of inflow from outside the survey area in terms of commuters and tourists.

## 1.7.6 Market trends in the class A3 (café & restaurants) sector

- 1.7.6.1 The commercial leisure sector is becoming an increasingly important contributor to the vitality and viability of destinations. Leisure time is a precious commodity to consumers and in order to maximise free time, research suggests that town centre visitors often combine leisure activities as part of an overall going out experience. A wide-ranging commercial leisure offer – including Class A3 restaurants and cafes – can deliver benefits to the vitality and viability of the centre as a whole, through increased dwell-time and linked trips spend in cafes, restaurants and other commercial leisure facilities.
- 1.7.6.2 There is extensive evidence that demonstrates the importance which café culture can make to wider vitality and viability of an area. Beyond Retail's 'Redefining the Shape and Purpose of Town Centres' (November 2013) concluded that 'town centres need to develop alternative functions to draw people back and support its retail base. Town centres will remain important as a focus for social and commercial purposes however must seek to provide more than a neighbourhood shopping role. Expanding their other roles will be an important response to the polarisation of shopping and in creating a vibrant, social, commercial and cultural hub'.
- 1.7.6.3 Recent research from Cushman & Wakefield notes that food and drink alone now accounts for more than 20% of retail and leisure units across the UK. New leisure trends such as indoor crazy golf and table tennis - termed 'competitive socialising' - are increasing in popularity and have opened in a number of locations, with Junkyard Golf on Brick Lane being a nearby example.
- 1.7.6.4 Some commercial leisure sectors have expanded rapidly in recent years, taking advantage of voids in centres arising as a result of some retailers contracting their activities as consumers' shopping patterns change, with the 'casual dining' and coffee shop sectors seeing the most expansion. Recent analysis shows that the UK's coffee shop sector remains one of the most successful in the nation's economy and will continue to expand. Operators such as Costa, Starbucks and Caffè Nero are an established High Street staple, whilst the independent coffee shop sector is also growing store numbers and has welcomed a substantial number of new entrants to the market in recent years, including Taylor St Baristas, Notes Coffee, Grind and Black Sheep.
- 1.7.6.5 Also increasingly popular are 'grab and go' shops which offer coffee/breakfast options in the morning before switching to broader lunch options: examples of chains successfully adopting this model, such as Pret, Leon, Itsu, Pod and Coco Di Mama, all of which are present in Shoreditch and/or nearby in locations such as Liverpool Street/Bishopsgate.

## 1.7.7 Impact assessment

- 1.7.7.1 As stated above, non-A1 retail uses are becoming increasingly important drivers of town centre vitality and viability. As the role of traditional shopping and town centres is evolving, the retail service and leisure sectors provide important functions within a wider mixed use development and have potential to become attractions in their own right. Cafes, restaurants and retail services such as hairdressers and estate agents provide important services to local residents, workers and visitors, providing multiple reasons to visit, increasing sustainability of shopping and leisure trip patterns, extending dwell time, and encouraging 'linked trips' with other retailers and businesses to the benefit of the wider area.
- 1.7.7.2 The proposed A2, A3 and A5 retail uses should therefore be considered as complementary uses to traditional A1 retail within the proposed development. The scale of uses is appropriate, and broadly reflects, in percentage terms, the proportion of non-A1 uses which currently trades at Boxpark Shoreditch.
- 1.7.7.3 It is not expected that the development of class A2, A3 and A5 uses at the application site would place The Goodsyard in direct competition with any other policy-defined centre, e.g. Angel, Dalston, Bishopsgate/Liverpool Street or Brick Lane, or indeed any of the lower-order centres which are proximate to the application site. All of these centres have existing provision of this nature which complements their wider retail and commercial function, and the A2, A3 and A5 facilities in each centre can, for the most part, be expected to serve each centre's local catchment.
- 1.7.7.4 Our analysis in this report has shown that Angel and Dalston are both established destinations for the evening and night-time economy, owing to the presence of a number of key attractors in each centre. These have been set out in our analysis of the surrounding network of centres in this report, which identified that Angel has a broad evening economy including live music venues, two cinemas, karaoke bars and a wealth of pubs, bars and restaurants. Dalston also plays an important role as a live music location, as well as a theatre and independent cinema. The successful role and function of these centres as evening/night-time economy locations will not be undermined by the application scheme.
- 1.7.7.5 Although the application seeks flexible consent for class A2, A3 and A5 uses, the target retailers for the other retail uses are focused around café and restaurant (class A3) uses which would seek to enhance the daytime and evening leisure offer of the development, in much the same way the current provision non-A1 uses at Boxpark Shoreditch (which are also entirely class A3) do. Class A3 uses rarely act as 'destinations' in their own right, but moreover play a complementary, supporting role to a wider mix of uses of a centre or destination. This inherently limits the potential for other locations to be adversely impacted by the development of such floorspace. The retail leasing strategy also seeks to ensure that the scheme complements the existing retail and leisure provision within the adjacent Brick Lane district centre, rather than seeking to replicate the unique and specialist offer provided at that location.
- 1.7.7.6 The provision of a range of non-A1 uses on the site will ensure that the development can efficiently meet a wide range of day to day needs of the local residents and visitors. The proportion of A2, A3 and A5 retail uses proposed will also have a significant influence on placemaking at The Goodsyard, and will play a key role in supporting the quality leisure offer proposed at the high level park and enhancing vitality at this level of the development.
- 1.7.7.7 The scheme has been designed to minimise any potential impact on residential amenity and late night noise through careful consideration of where these uses are located and therefore we anticipate that the A3 and A5 units proposed would cause minimal disturbance.
- 1.7.7.8 It can be concluded that the proposed A2, A3 and A5 floorspace would not have an adverse impact on the health of nearby policy-defined centres, all of which are displaying positive signs of vitality and viability, and each of which have their own established commercial leisure/non- class A1 offer, which serve each centre's respective residents and visitor catchments. The proposals will have an overall positive impact on the local area by assisting in serving the local needs of new residents and workers on site, attracting new visitors to the area, increasing dwell time in the local vicinity and increasing the vitality and viability of the wider area by reinforcing Shoreditch's reputation as a daytime and evening economy destination.

## **8.0 CONCLUSIONS**

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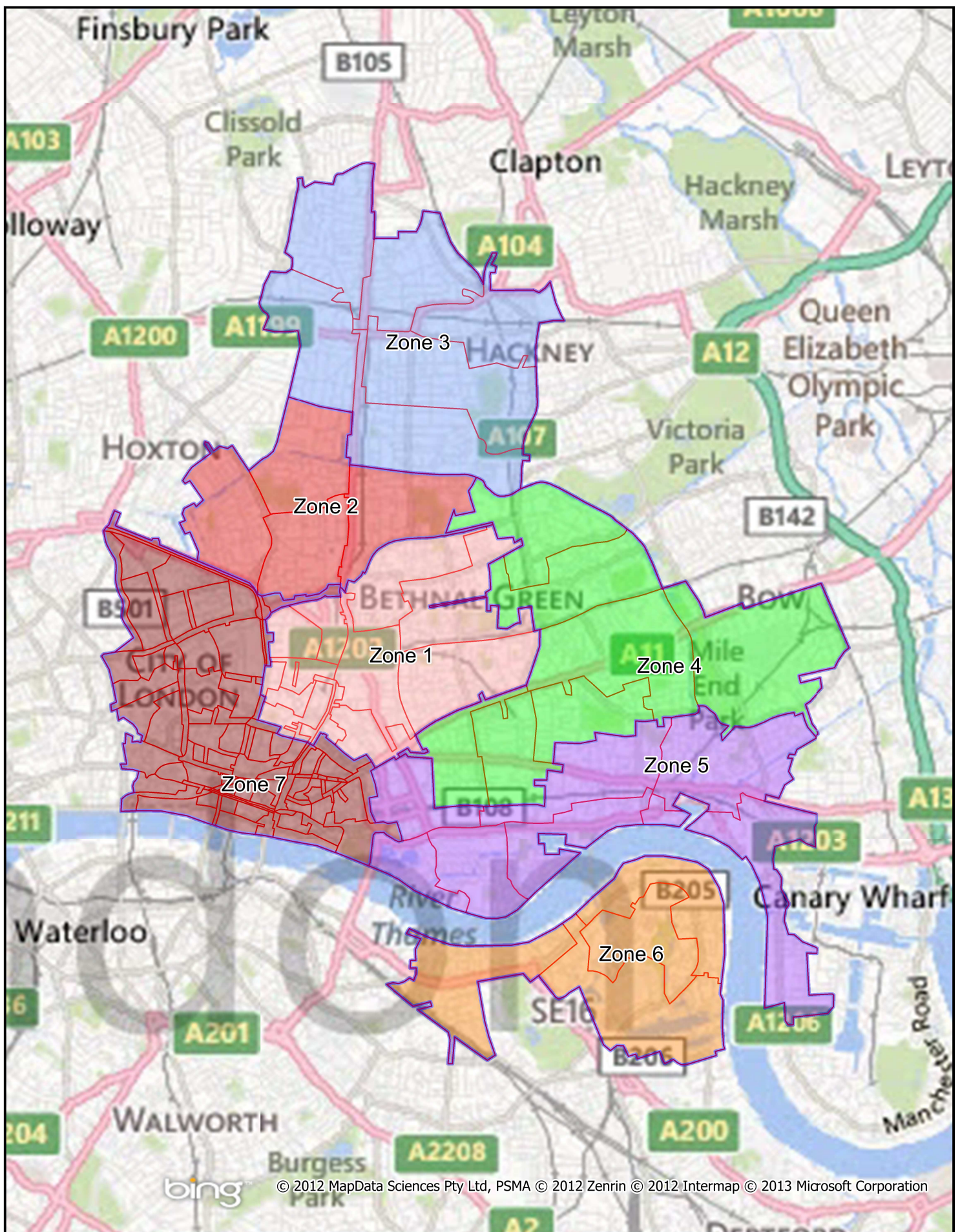
## 1.8 CONCLUSIONS

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- 1.8.1 We have demonstrated that the application proposals including a mix of uses, including retail, is in accordance with existing and emerging development plan documents. The application site is allocated for mixed use development, including retail, in both LBH and LBTH adopted development plans, and is located within the London CAZ – a strategic location for retail and leisure development to support local residents, workers, domestic visitors and international tourists.
- 1.8.2 The Draft Development Plan of relevance to the application site is at an advanced stage of development, and can be afforded weight in the consideration of this planning application. The review of emerging policy has identified a stronger and more proactive policy approach to the development of retail and leisure floorspace at the Goodsyards. The Draft London Plan allocates Shoreditch as a new Retail Cluster – a new town centre classification as defined in Annex 1, and allocates The Goodsyards as a key strategic mixed-use development site within the City Fringe.
- 1.8.3 Both LBH and LBTH draft emerging Local Plans direct that the CAZ will be expected to support the delivery of new retail and leisure floorspace to meet identified need, whilst the Draft Future Shoreditch AAP encourages retail uses, and identifies indicative development capacity of 39,000 sq m of retail/community space within the Bishopsgate Goodsyards 'priority development opportunity'.
- 1.8.4 In the context of the planning framework, a retail impact and sequential site assessment is not required in support of this application. Those assessments have, however, been undertaken in order to respond to comments raised during pre-application discussions.
- 1.8.5 The analysis has identified that the existing network of centres in the catchment all benefit from positive levels of vitality and viability, with many offering unique selling points. The application scheme will provide a positive enhancement to the adjacent Brick Lane district centre, improving its diversity of uses and assisting in the creation of a strong retail circuit linking Brick Lane, Spitalfields and Shoreditch. In terms of the sequential site assessment, no alternative sites which could accommodate the proposed development – even when adopting a flexible approach – were identified.
- 1.8.6 The findings of the 2015 retail impact assessment concluded that there would be no significant adverse impacts arising on existing centres or future investment as a result of the development proposals. When considering the planning application and accompanying Retail Assessment, the Mayor did not raise the level and type of retail floorspace as a contentious issue or a reason for refusal. The levels of impact were not concluded to be significant. The maximum level of comparison goods floorspace now being proposed has reduced from 20,100 sq m GEA (2015 Retail Assessment) to 19,547 sq m GEA. The original retail floorspace proposed was concluded to be acceptable in impact terms, and the same must also be concluded for the smaller, revised level of floorspace.
- 1.8.6.1 Overall, our analysis clearly demonstrates that there would not be any significant adverse impacts arising in terms of in centre trade/turnover, town centre vitality and viability, and existing/committed/planned investment. Contrary to impact, the analysis demonstrates that strong growth in consumer expenditure will help mitigate impact over the forecast years, and town centre turnover in every town will more than grow beyond the baseline allowance for business efficiency improvement. This is consistent with the findings of the most recent Experian Consumer Expenditure Report for London.
- 1.8.6.2 The mix of retail and leisure uses proposed will ensure that The Goodsyards development will be a vibrant and eclectic retail hub and visitor destination, generating footfall and dwell time in the local area, which will have beneficial knock on effects to existing retail facilities by completing the local retail link. The proposals will deliver significant benefits to the local area by improving the current retail offer, regenerating a derelict site, improving accessibility for comparison and convenience goods and creating opportunities for employment.

## **APPENDIX 1: SURVEY AREA**





## Bishopsgate Goodsyards Zones

**Pitney Bowes**  
Software



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## **APPENDIX 2: 2015 RETAIL IMPACT ASSESSMENT**

# The Goodsyard

## Comparison Retail Impact Assessment

**Table 1**  
**Survey Area Population Forecasts**

|             | Zone 1 | Zone 2 | Zone 3 | Zone 4 | Zone 5 | Zone 6 | Zone 7 | Total          |
|-------------|--------|--------|--------|--------|--------|--------|--------|----------------|
| <b>2013</b> | 36,800 | 31,825 | 50,740 | 69,857 | 60,720 | 25,976 | 29,584 | <b>305,502</b> |
| <b>2018</b> | 39,970 | 34,577 | 53,264 | 73,812 | 65,922 | 28,090 | 33,178 | <b>328,813</b> |
| <b>2023</b> | 43,020 | 37,215 | 57,328 | 79,444 | 70,952 | 30,233 | 35,709 | <b>353,901</b> |

Source: Pitney Bowes Business Insight Anysite Report, Bishopsgate Goods Yard January 2014 (population data at 2013 and 2018, extrapolated to 2023)

**Table 1A**  
**Survey Area Postal Sectors**

| Zone   | Postal Sectors  |
|--------|---|
| Zone 1 | E1 5/6/7, E2 6/7, EC2A 1/2/3/4, EC2M 1/2/3/4/7  |
| Zone 2 | N1 5/6/7, E2 8  |
| Zone 3 | E8 1/2/3/4, N1 4, N16 8   |
| Zone 4 | E1 1/2/3/4, E2 0/9, E3 4  |
| Zone 5 | E1 8/0, E1W 1/2/3, E14 7/8  |
| Zone 6 | SE16 4/5/6/7  |
| Zone 7 | EC3N 1/2/3/4, EC3A 2/3/5/6/7/8, EC3M 4/5, EC2N 1/2/3/4, EC3V 0/1/3/4/9, EC3R 5/6/7/8/9/0, EC3M 3/4/7/8, EC4R 1/2/3, EC4N 1/4/5/6/7/8/9, EC4V 2/3/4/5, EC4VM 5/6/7/8/9, EC2R 5/6/7/8, EC2M 5/6, EC2V 5/6/7/8, EC2Y 5/8/9, EC1Y 0/1/2/4/8, EC1A 4/7/9, EC1M 4/5/6/7, EC1V 0/1/2/3/4/7/8/9 |

# The Goodsyard

## Comparison Retail Impact Assessment

**Table 2**  
**Survey Area Retail Expenditure Forecasts Per Capita (2012 prices) - Comparison Goods**

|   |         |        |        |        |        |        |        |
|---|---------|--------|--------|--------|--------|--------|--------|
| Growth in comparison goods spending per capita: |         |        |        |        |        |        |        |
| 2012 - 2013                                     | 3.1% pa |        |        |        |        |        |        |
| 2013 - 2018                                     | 3.7% pa |        |        |        |        |        |        |
| 2018 - 2023                                     | 3.8% pa |        |        |        |        |        |        |
|   | Zone 1  | Zone 2 | Zone 3 | Zone 4 | Zone 5 | Zone 6 | Zone 7 |
| 2012  | 3,122   | 2,903  | 3,064  | 2,822  | 3,384  | 4,292  | 5,229  |
| 2013  | 3,219   | 2,993  | 3,159  | 2,909  | 3,489  | 4,425  | 5,391  |
| 2013 Minus SFT at 15.8%                         | 2,710   | 2,520  | 2,660  | 2,450  | 2,938  | 3,726  | 4,539  |
| 2018  | 3,860   | 3,589  | 3,788  | 3,489  | 4,184  | 5,307  | 6,465  |
| 2018 Minus SFT at 17.3%                         | 3,192   | 2,968  | 3,133  | 2,885  | 3,460  | 4,389  | 5,347  |
| 2023  | 4,651   | 4,325  | 4,565  | 4,204  | 5,042  | 6,394  | 7,790  |
| 2023 Minus SFT at 17.6%                         | 3,833   | 3,564  | 3,761  | 3,464  | 4,154  | 5,269  | 6,419  |

Source: Pitney Bowes Retail Expenditure Guide 2013/2014

Note: SFT deductions based on Pitney Bowes non-store retail sales (broad definition) central case figures

**Table 3**  
**Total Survey Area Comparison Goods Expenditure (2012 Prices)**

|      |         |         |         |         |         |         |         |           |
|------|---------|---------|---------|---------|---------|---------|---------|-----------|
|      | (£000)  | (£000)  | (£000)  | (£000)  | (£000)  | (£000)  | (£000)  | (£000)    |
| 2013 | 99,736  | 80,202  | 134,962 | 171,135 | 178,375 | 96,784  | 134,291 | 895,483   |
| 2018 | 127,592 | 102,634 | 166,871 | 212,982 | 228,097 | 123,273 | 177,389 | 1,138,838 |
| 2023 | 164,880 | 132,628 | 215,637 | 275,222 | 294,755 | 159,298 | 229,228 | 1,471,647 |

Source: Tables 1 & 2

# The Goodsyard

## Comparison Retail Impact Assessment

### Comparison Goods Market Share

**Table 4**  
**Comparison Goods Allocation 2013 - % Market Share**

| Zone  | Zone 1        | Zone 2        | Zone 3        | Zone 4        | Zone 5        | Zone 6        | Zone 7        |
|---|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Centre / Store  | (%)           | (%)           | (%)           | (%)           | (%)           | (%)           | (%)           |
| TOWN CENTRES  |               |               |               |               |               |               |               |
| West End (inc. Oxford Street, Regent Street, Bond Street) | 14.2%         | 24.5%         | 25.1%         | 17.5%         | 10.4%         | 18.8%         | 37.4%         |
| Surrey Quays / Canada Water                               | 1.2%          | 0.3%          | 0.8%          | 2.0%          | 7.8%          | 29.4%         | 0.0%          |
| Dalston / Kingsland Road                                  | 0.0%          | 5.2%          | 15.1%         | 0.0%          | 0.0%          | 0.0%          | 0.2%          |
| Angel, Islington  | 1.3%          | 11.1%         | 12.1%         | 0.4%          | 0.2%          | 0.3%          | 28.7%         |
| Whitechapel   | 12.9%         | 1.8%          | 0.0%          | 7.5%          | 4.5%          | 0.0%          | 0.0%          |
| Stratford (excluding Westfield Stratford City)            | 1.1%          | 2.1%          | 0.4%          | 10.9%         | 3.0%          | 2.1%          | 2.2%          |
| Westfield Stratford City                                  | 16.6%         | 7.8%          | 7.6%          | 14.3%         | 14.6%         | 3.7%          | 6.2%          |
| Mile End  | 10.1%         | 0.5%          | 0.4%          | 3.2%          | 2.8%          | 0.0%          | 0.0%          |
| Hackney Central   | 1.9%          | 7.2%          | 10.0%         | 0.5%          | 0.0%          | 0.0%          | 0.2%          |
| Canary Wharf  | 0.0%          | 0.0%          | 0.8%          | 1.8%          | 7.7%          | 5.4%          | 0.0%          |
| Beckton   | 0.0%          | 3.4%          | 0.0%          | 1.3%          | 7.8%          | 0.3%          | 0.0%          |
| SHOPPING CENTRES AND RETAIL PARKS                         |               |               |               |               |               |               |               |
| Lakeside  | 1.1%          | 0.6%          | 0.7%          | 1.3%          | 6.6%          | 1.4%          | 1.6%          |
| Beckton Retail Parks                                      | 3.8%          | 1.8%          | 0.0%          | 5.4%          | 10.7%         | 0.5%          | 0.7%          |
| Tottenham Retail Parks                                    | 2.0%          | 5.5%          | 4.1%          | 2.9%          | 0.1%          | 0.0%          | 2.1%          |
| Other   | 33.8%         | 28.2%         | 22.8%         | 31.0%         | 24.0%         | 38.3%         | 20.7%         |
| <b>Total</b>  | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

Source: NEMS Household Telephone Survey for DP9 (December 2013)

## The Goodsyard Comparison Retail Impact Assessment

**Table 5**  
**Comparison Goods Allocation 2013 - Spend (£) 2012 Prices**

| Zone  | Zone 1        | Zone 2        | Zone 3         | Zone 4         | Zone 5         | Zone 6        | Zone 7         | TOTAL          |
|---|---------------|---------------|----------------|----------------|----------------|---------------|----------------|----------------|
| Centre / Store  | (£000)        | (£000)        | (£000)         | (£000)         | (£000)         | (£000)        | (£000)         | (£000)         |
| <b>TOWN CENTRES</b>                                       |               |               |                |                |                |               |                |                |
| West End (inc. Oxford Street, Regent Street, Bond Street) | 14,140        | 19,638        | 33,934         | 30,029         | 18,479         | 18,156        | 50,248         | <b>184,623</b> |
| Surrey Quays / Canada Water                               | 1,225         | 271           | 1,110          | 3,340          | 13,840         | 28,435        | 0              | <b>48,221</b>  |
| Dalston / Kingsland Road                                  | 0             | 4,161         | 20,315         | 61             | 0              | 0             | 308            | <b>24,845</b>  |
| Angel, Islington  | 1,329         | 8,926         | 16,289         | 760            | 351            | 267           | 38,477         | <b>66,400</b>  |
| Whitechapel   | 12,867        | 1,471         | 0              | 12,832         | 7,983          | 0             | 0              | <b>35,153</b>  |
| Stratford (excluding Westfield Stratford City)            | 1,140         | 1,662         | 593            | 18,608         | 5,293          | 1,999         | 2,931          | <b>32,228</b>  |
| Westfield Stratford City                                  | 16,507        | 6,245         | 10,252         | 24,427         | 26,026         | 3,562         | 8,279          | <b>95,297</b>  |
| Mile End  | 10,081        | 423           | 556            | 5,558          | 4,937          | 0             | 0              | <b>21,554</b>  |
| Hackney Central   | 1,868         | 5,796         | 13,511         | 776            | 0              | 0             | 331            | <b>22,282</b>  |
| Canary Wharf  | 0             | 0             | 1,099          | 3,146          | 13,664         | 5,193         | 0              | <b>23,101</b>  |
| Beckton   | 0             | 2,695         | 0              | 2,145          | 13,893         | 246           | 0              | <b>18,979</b>  |
| <b>SHOPPING CENTRES AND RETAIL PARKS</b>                  |               |               |                |                |                |               |                |                |
| Lakeside  | 1,107         | 450           | 887            | 2,282          | 11,803         | 1,367         | 2,087          | <b>19,981</b>  |
| Beckton Retail Parks                                      | 3,784         | 1,453         | 0              | 9,188          | 19,002         | 489           | 945            | <b>34,860</b>  |
| Tottenham Retail Parks                                    | 2,022         | 4,372         | 5,580          | 4,948          | 266            | 0             | 2,876          | <b>20,064</b>  |
| Other   | 33,666        | 22,640        | 30,836         | 53,037         | 42,837         | 37,070        | 27,808         | <b>247,895</b> |
| <b>Total Survey Area</b>                                  | <b>99,736</b> | <b>80,202</b> | <b>134,962</b> | <b>171,135</b> | <b>178,375</b> | <b>96,784</b> | <b>134,291</b> | <b>895,483</b> |

Source: Tables 3 & 4

## The Goodsyard Comparison Retail Impact Assessment

**Table 6**  
**Comparison Goods Allocation 2018 - Spend (£) 2012 Prices**

| Zone  | Zone 1         | Zone 2         | Zone 3         | Zone 4         | Zone 5         | Zone 6         | Zone 7         | TOTAL            |
|---|----------------|----------------|----------------|----------------|----------------|----------------|----------------|------------------|
| Centre / Store  | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)           |
| <b>TOWN CENTRES</b>                                       |                |                |                |                |                |                |                |                  |
| West End (inc. Oxford Street, Regent Street, Bond Street) | 18,089         | 25,130         | 41,957         | 37,372         | 23,630         | 23,126         | 66,374         | <b>235,678</b>   |
| Surrey Quays / Canada Water                               | 1,568          | 347            | 1,373          | 4,156          | 17,697         | 36,217         | 0              | <b>61,358</b>    |
| Dalston / Kingsland Road                                  | 0              | 5,325          | 25,118         | 76             | 0              | 0              | 407            | <b>30,926</b>    |
| Angel, Islington  | 1,700          | 11,423         | 20,141         | 946            | 449            | 340            | 50,826         | <b>85,824</b>    |
| Whitechapel   | 16,461         | 1,883          | 0              | 15,969         | 10,208         | 0              | 0              | <b>44,521</b>    |
| Stratford (excluding Westfield Stratford City)            | 1,459          | 2,127          | 734            | 23,158         | 6,769          | 2,547          | 3,872          | <b>40,665</b>    |
| Westfield Stratford City                                  | 21,117         | 7,991          | 12,676         | 30,399         | 33,281         | 4,537          | 10,935         | <b>120,938</b>   |
| Mile End  | 12,896         | 542            | 687            | 6,917          | 6,313          | 0              | 0              | <b>27,355</b>    |
| Hackney Central   | 2,390          | 7,417          | 16,706         | 965            | 0              | 0              | 437            | <b>27,915</b>    |
| Canary Wharf  | 0              | 0              | 1,358          | 3,915          | 17,473         | 6,614          | 0              | <b>29,360</b>    |
| Beckton   | 0              | 3,449          | 0              | 2,669          | 17,766         | 313            | 0              | <b>24,197</b>    |
| <b>SHOPPING CENTRES AND RETAIL PARKS</b>                  |                |                |                |                |                |                |                |                  |
| Lakeside  | 1,416          | 576            | 1,096          | 2,840          | 15,093         | 1,741          | 2,757          | <b>25,518</b>    |
| Beckton Retail Parks                                      | 4,840          | 1,859          | 0              | 11,435         | 24,299         | 622            | 1,249          | <b>44,304</b>    |
| Tottenham Retail Parks                                    | 2,587          | 5,594          | 6,900          | 6,158          | 340            | 0              | 3,800          | <b>25,378</b>    |
| Other   | 43,069         | 28,972         | 38,126         | 66,007         | 54,778         | 47,216         | 36,733         | <b>314,901</b>   |
| <b>Total Survey Area</b>                                  | <b>127,592</b> | <b>102,634</b> | <b>166,871</b> | <b>212,982</b> | <b>228,097</b> | <b>123,273</b> | <b>177,389</b> | <b>1,138,838</b> |

Source: Tables 3 & 4

## The Goodsyard Comparison Retail Impact Assessment

**Table 7**  
**Comparison Goods Allocation 2023 - Spend (£) 2012 Prices**

| Zone  | Zone 1         | Zone 2         | Zone 3         | Zone 4         | Zone 5         | Zone 6         | Zone 7         | TOTAL            |
|---|----------------|----------------|----------------|----------------|----------------|----------------|----------------|------------------|
| Centre / Store  | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)           |
| <b>TOWN CENTRES</b>                                       |                |                |                |                |                |                |                |                  |
| West End (inc. Oxford Street, Regent Street, Bond Street) | 23376          | 32474          | 54218          | 48293          | 30536          | 29884          | 85771          | <b>304551</b>    |
| Surrey Quays / Canada Water                               | 2,026          | 448            | 1,774          | 5,371          | 22,869         | 46,801         | 0              | <b>79,289</b>    |
| Dalston / Kingsland Road                                  | 0              | 6,881          | 32,459         | 98             | 0              | 0              | 526            | <b>39,963</b>    |
| Angel, Islington  | 2,196          | 14,761         | 26,026         | 1,223          | 580            | 439            | 65,679         | <b>110,905</b>   |
| Whitechapel   | 21,271         | 2,433          | 0              | 20,636         | 13,191         | 0              | 0              | <b>57,531</b>    |
| Stratford (excluding Westfield Stratford City)            | 1,885          | 2,749          | 948            | 29,926         | 8,747          | 3,291          | 5,003          | <b>52,549</b>    |
| Westfield Stratford City                                  | 27,289         | 10,327         | 16,380         | 39,283         | 43,007         | 5,863          | 14,131         | <b>156,280</b>   |
| Mile End  | 16,665         | 700            | 888            | 8,938          | 8,158          | 0              | 0              | <b>35,349</b>    |
| Hackney Central   | 3,088          | 9,585          | 21,588         | 1,248          | 0              | 0              | 565            | <b>36,073</b>    |
| Canary Wharf  | 0              | 0              | 1,755          | 5,059          | 22,579         | 8,546          | 0              | <b>37,940</b>    |
| Beckton   | 0              | 4,457          | 0              | 3,449          | 22,958         | 405            | 0              | <b>31,269</b>    |
| <b>SHOPPING CENTRES AND RETAIL PARKS</b>                  |                |                |                |                |                |                |                |                  |
| Lakeside  | 1,830          | 744            | 1,417          | 3,670          | 19,503         | 2,249          | 3,562          | <b>32,975</b>    |
| Beckton Retail Parks                                      | 6,255          | 2,402          | 0              | 14,776         | 31,400         | 804            | 1,614          | <b>57,251</b>    |
| Tottenham Retail Parks                                    | 3,343          | 7,229          | 8,916          | 7,957          | 440            | 0              | 4,910          | <b>32,795</b>    |
| Other   | 55,656         | 37,438         | 49,268         | 85,296         | 70,786         | 61,015         | 47,467         | <b>406,927</b>   |
| <b>Total Survey Area</b>                                  | <b>164,880</b> | <b>132,628</b> | <b>215,637</b> | <b>275,222</b> | <b>294,755</b> | <b>159,298</b> | <b>229,228</b> | <b>1,471,647</b> |

Source: Tables 3 & 4

# The Goodsyard Comparison Retail Impact Assessment

## Committed Developments

**Table 8a**  
**Comparison Goods Committed Development**

| Site   | Estimated Net Comparison<br>Floorspace (sqm) | Benchmark Sales Density<br>(£/sqm net) | Average Turnover 2013<br>(£000) | Average Turnover 2018<br>(£000) | Turnover from within Survey Area<br>(%) | 2018 (£000)    | Average Turnover 2023<br>(£000) | Turnover from within Survey Area<br>(%) | 2023 (£000)    |
|--|--|--|---------------------------------|---------------------------------|---|----------------|---------------------------------|---|----------------|
| 261 Eagle House, City Road (LB Hackney)<br>Application Reference 2006/0201 and 2013/0758                   | 953  | £5,000                                 | £4,766                          | £5,211                          | 60%                                     | £3,126.56      | £5,697                          | 60%                                     | £3,418.27      |
| 223 Shoreditch High Street (Principal Place) (LB Hackney)<br>Application Reference 2011/0698 and 2012/0649 | 786  | £5,000                                 | £3,928                          | £4,295                          | 60%                                     | £2,576.77      | £4,695                          | 60%                                     | £2,817.18      |
| One Crown Place (LB Hackney)<br>Application Reference 2009/2464  | 588  | £5,000                                 | £2,940                          | £3,214                          | 60%                                     | £1,928.58      | £3,514                          | 60%                                     | £2,108.51      |
| 250 City Road (LB Islington)<br>Application Reference P082607  | 866  | £5,000                                 | £4,330                          | £4,734                          | 60%                                     | £2,840.39      | £5,176                          | 60%                                     | £3,105.40      |
| Canada Water Sites C + E (LB Southwark)<br>Application Reference 12/AP/4126                                | 10,178                                       | £5,000                                 | £50,890                         | £55,638                         | 40%                                     | £22,255.19     | £60,829                         | 40%                                     | £24,331.58     |
| Surrey Quays Shopping Centre Extension (LB Southwark)<br>Application Reference 11/AP/4206                  | 8,760  | £5,000                                 | £43,800                         | £47,886                         | 40%                                     | £17,520        | £52,354                         | 40%                                     | £20,941.70     |
| 120 Fenchurch Street (CoL)<br>Application Reference 11/00854/FULEIA  | 1,202  | £5,000                                 | £6,010                          | £6,571                          | 60%                                     | £3,606.19      | £7,184                          | 60%                                     | £4,310.48      |
| <b>Total</b>   | <b>23,333</b>                                | <b>£5,000.00</b>                       | <b>£116,665</b>                 | <b>£127,549</b>                 | <b>-</b>                                | <b>£53,854</b> | <b>£139,450</b>                 | <b>-</b>                                | <b>£61,033</b> |

**Table 8b**  
**Comparison Goods Pipeline Development**

| Site   | Estimated Net Comparison<br>Floorspace (sqm) | Benchmark Sales Density<br>(£/sqm net) | Average Turnover 2013<br>(£000) | Average Turnover 2018<br>(£000) | Turnover from within Survey Area<br>(%) | 2018 (£000)   | Average Turnover 2023<br>(£000) | Turnover from within Survey Area<br>(%) | 2023 (£000)    |
|--|--|--|---------------------------------|---------------------------------|---|---------------|---------------------------------|---|----------------|
| Shoreditch Village (LB Hackney)<br>Application Reference 2012/3792 | 2,153  | £5,000                                 | £10,766                         | £11,771                         | 60%                                     | £7,062.44     | £12,869                         | 60%                                     | £7,062         |
| The Stage (LB Hackney)<br>Application Reference 2012/3871          | 888  | £5,000                                 | £4,440                          | £4,854                          | 60%                                     | £2,912.55     | £5,307                          | 60%                                     | £3,184.29      |
| <b>Total</b>   | <b>3,041</b>                                 | <b>£5,000.00</b>                       | <b>£15,206</b>                  | <b>£16,625</b>                  | <b>-</b>                                | <b>£9,975</b> | <b>£18,176</b>                  | <b>-</b>                                | <b>£10,247</b> |

Note: Comparison floorspace estimates based on DP9 assumptions having regard to the information provided by the respective application supporting documentation, committee reports and decision notices.

Note: Benchmark sales densities and turnover from within study area both based on DP9 estimates

Note: Includes assumed sales density efficiencies of 1.8%pa in accordance with Pitney Bowes Retail Expenditure Guide 2013/2014

Note: Pipeline development consents have received a resolution to grant consent





**The Goodsyard**  
**Comparison Retail Impact Assessment**

**Comparison Goods Turnover - WITH COMMITTED DEVELOPMENT AT 2018**

**Table 10**  
**Comparison Goods Allocation 2018 - Spend (£) 2012 Prices**

| Zone  | Zone 1         | Zone 2         | Zone 3         | Zone 4         | Zone 5         | Zone 6         | Zone 7         | TOTAL            |
|---|----------------|----------------|----------------|----------------|----------------|----------------|----------------|------------------|
| Centre / Store  | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)           |
| LB Hackney Commitments                                    | 880            | 7,043          | 8,803          | 880            | 0              | 0              | 0              | 17,607           |
| :B Islington Commitments                                  | 142            | 1,420          | 142            | 0              | 0              | 0              | 1,136          | 2,840            |
| LB Southwark Commitments                                  | 1,193          | 0              | 0              | 3,978          | 7,955          | 24,661         | 1,989          | 39,775           |
| City of London Commitments                                | 180            | 721            | 0              | 0              | 180            | 0              | 2,524          | 3,606            |
| TOWN CENTRES  |                |                |                |                |                |                |                |                  |
| West End (inc. Oxford Street, Regent Street, Bond Street) | 17,451         | 20,922         | 38,002         | 35,561         | 21,739         | 13,880         | 63,891         | 211,447          |
| Surrey Quays / Canada Water                               | 1,568          | 347            | 1,373          | 4,156          | 17,697         | 34,985         | 0              | 60,125           |
| Dalston / Kingsland Road                                  | 0              | 4,471          | 23,616         | 76             | 0              | 0              | 407            | 28,570           |
| Angel, Islington  | 1,700          | 9,489          | 18,973         | 946            | 449            | 340            | 49,318         | 81,215           |
| Whitechapel   | 16,180         | 1,883          | 0              | 15,969         | 10,208         | 0              | 0              | 44,240           |
| Stratford (excluding Westfield Stratford City)            | 1,459          | 2,127          | 734            | 22,597         | 6,769          | 2,547          | 3,872          | 40,104           |
| Westfield Stratford City                                  | 20,274         | 7,838          | 12,676         | 29,335         | 30,932         | 4,537          | 10,451         | 116,042          |
| Mile End  | 12,871         | 542            | 687            | 6,917          | 6,313          | 0              | 0              | 27,329           |
| Hackney Central   | 2,364          | 7,335          | 16,205         | 965            | 0              | 0              | 437            | 27,307           |
| Canary Wharf  | 0              | 0              | 1,358          | 3,915          | 16,560         | 4,148          | 0              | 25,982           |
| Beckton   | 0              | 3,449          | 0              | 2,669          | 17,766         | 313            | 0              | 24,197           |
| SHOPPING CENTRES AND RETAIL PARKS                         |                |                |                |                |                |                |                |                  |
| Lakeside  | 1,416          | 576            | 1,096          | 2,840          | 15,093         | 1,741          | 2,757          | 25,518           |
| Beckton Retail Parks                                      | 4,776          | 1,859          | 0              | 11,435         | 23,158         | 622            | 1,249          | 43,100           |
| Tottenham Retail Parks                                    | 2,587          | 5,594          | 6,900          | 6,158          | 340            | 0              | 3,800          | 25,378           |
| Other   | 42,551         | 27,019         | 36,306         | 64,585         | 52,936         | 35,500         | 35,559         | 294,455          |
| <b>Total Survey Area</b>                                  | <b>127,592</b> | <b>102,634</b> | <b>166,871</b> | <b>212,982</b> | <b>228,097</b> | <b>123,273</b> | <b>177,389</b> | <b>1,138,838</b> |

Source: Tables 3 & 10

**The Goodsyard**  
**Comparison Retail Impact Assessment**

**Comparison Goods Market Share - WITH COMMITTED DEVELOPMENT AT 2023**

**Table 11**  
**Comparison Goods Allocation 2023 - % Market Share**

| Zone  | Zone 1        | Zone 2        | Zone 3        | Zone 4        | Zone 5        | Zone 6        | Zone 7        |
|---|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Centre / Store  | (%)           | (%)           | (%)           | (%)           | (%)           | (%)           | (%)           |
| LB Hackney Commitments                                    | 0.6%          | 5.6%          | 4.3%          | 0.3%          | 0.0%          | 0.0%          | 0.0%          |
| LB Islington Commitments                                  | 0.1%          | 1.2%          | 0.1%          | 0.0%          | 0.0%          | 0.0%          | 0.5%          |
| LB Southwark Commitments                                  | 0.8%          | 0.0%          | 0.0%          | 1.6%          | 3.1%          | 17.6%         | 1.0%          |
| City of London Commitments                                | 0.1%          | 0.7%          | 0.0%          | 0.0%          | 0.1%          | 0.0%          | 1.3%          |
| TOWN CENTRES  |               |               |               |               |               |               |               |
| West End (inc. Oxford Street, Regent Street, Bond Street) | 13.8%         | 20.7%         | 23.3%         | 16.8%         | 9.7%          | 12.0%         | 36.0%         |
| Surrey Quays / Canada Water                               | 1.2%          | 0.3%          | 0.8%          | 2.0%          | 7.8%          | 28.7%         | 0.0%          |
| Dalston / Kingsland Road                                  | 0.0%          | 4.7%          | 14.3%         | 0.0%          | 0.0%          | 0.0%          | 0.2%          |
| Angel, Islington  | 1.3%          | 9.6%          | 11.5%         | 0.4%          | 0.2%          | 0.3%          | 27.9%         |
| Whitechapel   | 12.7%         | 1.8%          | 0.0%          | 7.5%          | 4.5%          | 0.0%          | 0.0%          |
| Stratford (excluding Westfield Stratford City)            | 1.1%          | 2.1%          | 0.4%          | 10.7%         | 3.0%          | 2.1%          | 2.2%          |
| Westfield Stratford City                                  | 15.9%         | 7.7%          | 7.6%          | 13.9%         | 13.7%         | 3.7%          | 6.1%          |
| Mile End  | 10.1%         | 0.5%          | 0.4%          | 3.2%          | 2.8%          | 0.0%          | 0.0%          |
| Hackney Central   | 1.9%          | 7.1%          | 9.7%          | 0.5%          | 0.0%          | 0.0%          | 0.2%          |
| Canary Wharf  | 0.0%          | 0.0%          | 0.8%          | 1.8%          | 7.4%          | 4.6%          | 0.0%          |
| Beckton   | 0.0%          | 3.4%          | 0.0%          | 1.3%          | 7.8%          | 0.3%          | 0.0%          |
| SHOPPING CENTRES AND RETAIL PARKS                         |               |               |               |               |               |               |               |
| Lakeside  | 1.1%          | 0.6%          | 0.7%          | 1.3%          | 6.6%          | 1.4%          | 1.6%          |
| Beckton Retail Parks                                      | 3.7%          | 1.8%          | 0.0%          | 5.4%          | 10.3%         | 0.5%          | 0.7%          |
| Tottenham Retail Parks                                    | 2.0%          | 5.5%          | 4.1%          | 2.9%          | 0.1%          | 0.0%          | 2.1%          |
| Other   | 33.4%         | 26.9%         | 22.0%         | 30.3%         | 23.1%         | 29.0%         | 20.2%         |
| <b>Total</b>  | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

Source: NEMS Household Telephone Survey for DP9 (December 2013)

**The Goodsyard**  
**Comparison Retail Impact Assessment**

**Comparison Goods Turnover - WITH COMMITTED DEVELOPMENT AT 2023**

**Table 12**

**Comparison Goods Allocation 2023 - Spend (£) 2012 Prices**

| Zone  | Zone 1         | Zone 2         | Zone 3         | Zone 4         | Zone 5         | Zone 6         | Zone 7         | TOTAL            |
|---|----------------|----------------|----------------|----------------|----------------|----------------|----------------|------------------|
| Centre / Store  | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)           |
| LB Hackney Commitments                                    | 930            | 7,436          | 9,295          | 930            | 0              | 0              | 0              | 18,591           |
| :B Islington Commitments                                  | 155            | 1,553          | 155            | 0              | 0              | 0              | 1,242          | 3,105            |
| LB Southwark Commitments                                  | 1,358          | 0              | 0              | 4,527          | 9,055          | 28,069         | 2,264          | 45,273           |
| City of London Commitments                                | 216            | 862            | 0              | 0              | 216            | 0              | 3,017          | 4,310            |
| TOWN CENTRES  |                |                |                |                |                |                |                |                  |
| West End (inc. Oxford Street, Regent Street, Bond Street) | 22,733         | 27,434         | 50,207         | 46,367         | 28,699         | 19,052         | 82,562         | 277,053          |
| Surrey Quays / Canada Water                               | 2,026          | 448            | 1,774          | 5,371          | 22,869         | 45,686         | 0              | 78,174           |
| Dalston / Kingsland Road                                  | 0              | 6,218          | 30,734         | 98             | 0              | 0              | 526            | 37,575           |
| Angel, Islington  | 2,196          | 12,678         | 24,733         | 1,223          | 580            | 439            | 63,864         | 105,713          |
| Whitechapel   | 20,985         | 2,433          | 0              | 20,636         | 13,191         | 0              | 0              | 57,245           |
| Stratford (excluding Westfield Stratford City)            | 1,885          | 2,749          | 948            | 29,354         | 8,747          | 3,291          | 5,003          | 51,977           |
| Westfield Stratford City                                  | 26,293         | 10,194         | 16,380         | 38,210         | 40,266         | 5,863          | 13,902         | 151,108          |
| Mile End  | 16,632         | 700            | 888            | 8,938          | 8,158          | 0              | 0              | 35,316           |
| Hackney Central   | 3,055          | 9,479          | 20,941         | 1,248          | 0              | 0              | 565            | 35,287           |
| Canary Wharf  | 0              | 0              | 1,755          | 5,059          | 21,695         | 7,272          | 0              | 35,781           |
| Beckton   | 0              | 4,457          | 0              | 3,449          | 22,958         | 405            | 0              | 31,269           |
| SHOPPING CENTRES AND RETAIL PARKS                         |                |                |                |                |                |                |                |                  |
| Lakeside  | 1,830          | 744            | 1,417          | 3,670          | 19,503         | 2,249          | 3,562          | 32,975           |
| Beckton Retail Parks                                      | 6,172          | 2,402          | 0              | 14,776         | 30,221         | 804            | 1,614          | 55,990           |
| Tottenham Retail Parks                                    | 3,343          | 7,229          | 8,916          | 7,957          | 440            | 0              | 4,910          | 32,795           |
| Other   | 55,071         | 35,612         | 47,494         | 83,411         | 68,157         | 46,167         | 46,198         | 382,111          |
| <b>Total Survey Area</b>                                  | <b>164,880</b> | <b>132,628</b> | <b>215,637</b> | <b>275,222</b> | <b>294,755</b> | <b>159,298</b> | <b>229,228</b> | <b>1,471,647</b> |

**The Goodsyard**  
**Comparison Retail Impact Assessment**

**The Goodsyard - Retail Development Proposal Phasing**

**Table 13**  
**Proposed Comparison Turnover of The Goodsyard**

|  | Total Comparison<br>Bishopsgate 2018 | Total Comparison<br>Bishopsgate 2023 |
|--|--------------------------------------|--------------------------------------|
| Maximum A1 retail floorspace (sqm gross)                         | 10,050                               | 20,100                               |
| Net: Gross ratio   | 75%                                  | 75%                                  |
| Maximum A1 retail floorspace (sqm net)                           | 7,538                                | 15,075                               |
| Turnover per sqm (£)   | 6,000                                | 6,000                                |
| Total scheme turnover (£000s)                                    | 45,225                               | 90,450                               |
| Derived from within the survey area                              | 60%                                  | 60%                                  |
| <b>Total scheme turnover from within the survey area (£000s)</b> | <b>27,135</b>                        | <b>54,270</b>                        |

**The Goodsyard - Trade Draw**

**Table 14**  
**The Goodsyard Trade Draw From Within Survey Area 2018**

|                         | ZONE 1 | ZONE 2 | ZONE 3 | ZONE 4 | ZONE 5 | ZONE 6 | ZONE 7 | TOTAL  |
|-------------------------|--------|--------|--------|--------|--------|--------|--------|--------|
| DRAW FROM ZONES (%)     | 50%    | 18%    | 6%     | 7%     | 5%     | 2%     | 12%    | 100%   |
| DRAW FROM ZONES (£000s) | 13,568 | 4,884  | 1,628  | 1,899  | 1,357  | 543    | 3,256  | 27,135 |
| MARKET SHARE UPLIFT (%) | 11%    | 5%     | 1%     | 1%     | 1%     | 0%     | 2%     | -      |

Note: Inflow of 25% estimated from beyond survey area

**Table 15**  
**The Goodsyard Trade Draw From Within Survey Area 2023**

|                         | ZONE 1 | ZONE 2 | ZONE 3 | ZONE 4 | ZONE 5 | ZONE 6 | ZONE 7 | TOTAL  |
|-------------------------|--------|--------|--------|--------|--------|--------|--------|--------|
| DRAW FROM ZONES (%)     | 50%    | 18%    | 6%     | 7%     | 5%     | 2%     | 12%    | 100%   |
| DRAW FROM ZONES (£000s) | 27,135 | 9,769  | 3,256  | 3,799  | 2,714  | 1,085  | 6,512  | 54,270 |
| MARKET SHARE UPLIFT (%) | 16%    | 7%     | 2%     | 1%     | 1%     | 1%     | 3%     | -      |

Note: Inflow of 25% estimated from beyond survey area



**The Goodsyard**  
**Comparison Retail Impact Assessment**

**Comparison Goods Turnover - WITH COMMITTED DEVELOPMENT AND PROPOSED DEVELOPMENT AT 2018**

**Table 17**

**Comparison Goods Allocation 2018 - Spend (£) 2012 Prices**

| Zone  | Zone 1         | Zone 2         | Zone 3         | Zone 4         | Zone 5         | Zone 6         | Zone 7         | TOTAL            |
|---|----------------|----------------|----------------|----------------|----------------|----------------|----------------|------------------|
| Centre / Store  | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)           |
| THE GOODSYARD   | 13,568         | 4,884          | 1,628          | 1,899          | 1,357          | 543            | 3,256          | 27,135           |
| LB Hackney Commitments                                    | 753            | 7,022          | 8,720          | 880            | 0              | 0              | 0              | 17,375           |
| :B Islington Commitments                                  | 78             | 1,400          | 142            | 0              | 0              | 0              | 1,136          | 2,756            |
| LB Southwark Commitments                                  | 1,193          | 0              | 0              | 3,978          | 7,955          | 24,537         | 1,989          | 39,652           |
| City of London Commitments                                | 117            | 721            | 0              | 0              | 180            | 0              | 2,347          | 3,365            |
| <b>TOWN CENTRES</b>                                       |                |                |                |                |                |                |                |                  |
| West End (inc. Oxford Street, Regent Street, Bond Street) | 13,368         | 18,151         | 37,418         | 34,922         | 21,511         | 13,757         | 62,472         | 201,599          |
| Surrey Quays / Canada Water                               | 1,568          | 347            | 1,373          | 4,156          | 17,697         | 34,800         | 0              | 59,941           |
| Dalston / Kingsland Road                                  | 0              | 4,471          | 23,483         | 76             | 0              | 0              | 407            | 28,436           |
| Angel, Islington  | 1,572          | 8,976          | 18,822         | 946            | 449            | 340            | 48,609         | 79,715           |
| Whitechapel   | 15,287         | 1,883          | 0              | 15,863         | 10,208         | 0              | 0              | 43,240           |
| Stratford (excluding Westfield Stratford City)            | 1,459          | 2,127          | 734            | 22,384         | 6,769          | 2,547          | 3,872          | 39,891           |
| Westfield Stratford City                                  | 15,425         | 7,324          | 12,342         | 28,802         | 30,362         | 4,537          | 10,096         | 108,889          |
| Mile End  | 12,360         | 542            | 687            | 6,917          | 6,313          | 0              | 0              | 26,819           |
| Hackney Central   | 2,237          | 7,130          | 16,105         | 965            | 0              | 0              | 437            | 26,874           |
| Canary Wharf  | 0              | 0              | 1,358          | 3,915          | 16,560         | 4,148          | 0              | 25,982           |
| Beckton   | 0              | 3,449          | 0              | 2,669          | 17,652         | 313            | 0              | 24,083           |
| <b>SHOPPING CENTRES AND RETAIL PARKS</b>                  |                |                |                |                |                |                |                |                  |
| Lakeside  | 1,161          | 576            | 1,096          | 2,840          | 15,093         | 1,741          | 2,757          | 25,263           |
| Beckton Retail Parks                                      | 4,139          | 1,859          | 0              | 11,435         | 22,976         | 622            | 1,249          | 42,279           |
| Tottenham Retail Parks                                    | 2,459          | 5,286          | 6,900          | 6,158          | 340            | 0              | 3,800          | 24,943           |
| Other   | 40,849         | 26,486         | 36,063         | 64,176         | 52,674         | 35,388         | 34,964         | 290,601          |
| <b>Total Survey Area</b>                                  | <b>127,592</b> | <b>102,634</b> | <b>166,871</b> | <b>212,982</b> | <b>228,097</b> | <b>123,273</b> | <b>177,389</b> | <b>1,138,838</b> |

Source: Tables 3 & 17

**The Goodsyard**  
**Comparison Retail Impact Assessment**

**Comparison Goods Market Share - WITH COMMITTED DEVELOPMENT AND PROPOSED DEVELOPMENT AT 2023**

**Table 18**

**Comparison Goods Allocation 2023 - % Market Share**

| Zone  | Zone 1        | Zone 2        | Zone 3        | Zone 4        | Zone 5        | Zone 6        | Zone 7        |
|---|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Centre / Store  | (%)           | (%)           | (%)           | (%)           | (%)           | (%)           | (%)           |
| THE GOODSYARD   | 16.5%         | 7.4%          | 1.5%          | 1.4%          | 0.9%          | 0.7%          | 2.8%          |
| LB Hackney Commitments                                    | 0.5%          | 6.8%          | 5.2%          | 0.4%          | 0.0%          | 0.0%          | 0.0%          |
| LB Islington Commitments                                  | 0.0%          | 1.3%          | 0.1%          | 0.0%          | 0.0%          | 0.0%          | 0.6%          |
| LB Southwark Commitments                                  | 0.9%          | 0.0%          | 0.0%          | 1.9%          | 3.5%          | 19.9%         | 1.1%          |
| City of London Commitments                                | 0.0%          | 0.7%          | 0.0%          | 0.0%          | 0.1%          | 0.0%          | 1.2%          |
| TOWN CENTRES  |               |               |               |               |               |               |               |
| West End (inc. Oxford Street, Regent Street, Bond Street) | 9.2%          | 17.4%         | 22.3%         | 16.4%         | 9.4%          | 11.1%         | 35.0%         |
| Surrey Quays / Canada Water                               | 1.2%          | 0.3%          | 0.8%          | 2.0%          | 7.8%          | 28.1%         | 0.0%          |
| Dalston / Kingsland Road                                  | 0.0%          | 4.3%          | 14.1%         | 0.0%          | 0.0%          | 0.0%          | 0.2%          |
| Angel, Islington  | 0.7%          | 8.1%          | 11.3%         | 0.4%          | 0.2%          | 0.3%          | 27.2%         |
| Whitechapel   | 11.8%         | 1.8%          | 0.0%          | 7.4%          | 4.5%          | 0.0%          | 0.0%          |
| Stratford (excluding Westfield Stratford City)            | 1.1%          | 2.1%          | 0.4%          | 10.5%         | 3.0%          | 2.1%          | 2.2%          |
| Westfield Stratford City                                  | 11.0%         | 6.6%          | 7.3%          | 13.4%         | 13.2%         | 3.7%          | 5.6%          |
| Mile End  | 9.3%          | 0.5%          | 0.4%          | 3.2%          | 2.8%          | 0.0%          | 0.0%          |
| Hackney Central   | 1.5%          | 6.6%          | 9.6%          | 0.5%          | 0.0%          | 0.0%          | 0.2%          |
| Canary Wharf  | 0.0%          | 0.0%          | 0.8%          | 1.8%          | 7.3%          | 3.4%          | 0.0%          |
| Beckton   | 0.0%          | 3.4%          | 0.0%          | 1.3%          | 7.7%          | 0.3%          | 0.0%          |
| SHOPPING CENTRES AND RETAIL PARKS                         |               |               |               |               |               |               |               |
| Lakeside  | 0.5%          | 0.6%          | 0.7%          | 1.3%          | 6.6%          | 1.4%          | 1.6%          |
| Beckton Retail Parks                                      | 2.9%          | 1.8%          | 0.0%          | 5.4%          | 10.0%         | 0.5%          | 0.7%          |
| Tottenham Retail Parks                                    | 1.7%          | 4.7%          | 4.1%          | 2.9%          | 0.1%          | 0.0%          | 2.1%          |
| Other   | 31.1%         | 25.6%         | 21.4%         | 29.9%         | 23.0%         | 28.7%         | 19.3%         |
| <b>Total</b>  | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

Source: NEMS Household Telephone Survey for DP9 (December 2013)



**The Goodsyard**  
**Comparison Retail Impact Assessment**

**Comparison Goods Turnover - WITH COMMITTED DEVELOPMENT AND PROPOSED DEVELOPMENT AT 2023**

**Table 19**

**Comparison Goods Allocation 2023 - Spend (£) 2012 Prices**

| Zone  | Zone 1         | Zone 2         | Zone 3         | Zone 4         | Zone 5         | Zone 6         | Zone 7         | TOTAL            |
|---|----------------|----------------|----------------|----------------|----------------|----------------|----------------|------------------|
| Centre / Store  | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)         | (£000)           |
| THE GOODSYARD   | 27,135         | 9,769          | 3,256          | 3,799          | 2,714          | 1,085          | 6,512          | 54,270           |
| LB Hackney Commitments                                    | 808            | 9,035          | 11,268         | 1,138          | 0              | 0              | 0              | 22,248           |
| :B Islington Commitments                                  | 19             | 1,769          | 184            | 0              | 0              | 0              | 1,468          | 3,439            |
| LB Southwark Commitments                                  | 1,542          | 0              | 0              | 5,140          | 10,280         | 31,676         | 2,570          | 51,208           |
| City of London Commitments                                | 68             | 932            | 0              | 0              | 233            | 0              | 2,804          | 4,037            |
| TOWN CENTRES  |                |                |                |                |                |                |                |                  |
| West End (inc. Oxford Street, Regent Street, Bond Street) | 15,132         | 23,058         | 48,029         | 45,128         | 27,797         | 17,698         | 80,269         | 257,111          |
| Surrey Quays / Canada Water                               | 2,026          | 448            | 1,774          | 5,371          | 22,869         | 44,762         | 0              | 77,250           |
| Dalston / Kingsland Road                                  | 0              | 5,645          | 30,302         | 98             | 0              | 0              | 526            | 36,571           |
| Angel, Islington  | 1,207          | 10,803         | 24,301         | 1,223          | 580            | 439            | 62,355         | 100,910          |
| Whitechapel   | 19,425         | 2,433          | 0              | 20,361         | 13,191         | 0              | 0              | 55,409           |
| Stratford (excluding Westfield Stratford City)            | 1,885          | 2,749          | 948            | 28,788         | 8,747          | 3,291          | 5,003          | 51,411           |
| Westfield Stratford City                                  | 18,119         | 8,802          | 15,733         | 36,806         | 38,792         | 5,863          | 12,817         | 136,933          |
| Mile End  | 15,313         | 700            | 888            | 8,938          | 8,158          | 0              | 0              | 33,997           |
| Hackney Central   | 2,396          | 8,816          | 20,769         | 1,248          | 0              | 0              | 565            | 33,792           |
| Canary Wharf  | 0              | 0              | 1,755          | 5,059          | 21,400         | 5,361          | 0              | 33,575           |
| Beckton   | 0              | 4,457          | 0              | 3,449          | 22,722         | 405            | 0              | 31,033           |
| SHOPPING CENTRES AND RETAIL PARKS                         |                |                |                |                |                |                |                |                  |
| Lakeside  | 840            | 744            | 1,417          | 3,670          | 19,503         | 2,249          | 3,562          | 31,986           |
| Beckton Retail Parks                                      | 4,853          | 2,402          | 0              | 14,776         | 29,484         | 804            | 1,614          | 53,934           |
| Tottenham Retail Parks                                    | 2,848          | 6,168          | 8,916          | 7,957          | 440            | 0              | 4,910          | 31,239           |
| Other   | 51,264         | 33,900         | 46,097         | 82,275         | 67,844         | 45,665         | 44,252         | 371,295          |
| <b>Total Survey Area</b>                                  | <b>164,880</b> | <b>132,628</b> | <b>215,637</b> | <b>275,222</b> | <b>294,755</b> | <b>159,298</b> | <b>229,228</b> | <b>1,471,647</b> |

Source: Tables 3 & 19

**The Goodsyard**  
**Comparison Retail Impact Assessment**

**Comparison Impact Arising in Survey Area**

**Table 20**  
**Comparison Goods Cumulative Impact Summary**

|   | 2018 Turnover<br>No Development | 2023 Turnover<br>No Development | Turnover 2018<br>WITH Commitments<br>(£000) | 2018 IMPACT<br>of Commitments<br>(£000) | 2018 IMPACT<br>of Commitments<br>(%) | Turnover 2018<br>WITH Commitments<br>AND Proposed<br>Development (£000) | 2018 IMPACT<br>of Commitments<br>AND Proposed<br>Development<br>(£000) | 2018 IMPACT<br>of Commitments<br>AND Proposed<br>Development<br>(%) | Turnover 2023<br>WITH Commitments<br>AND Proposed<br>Development (£000) | 2023 IMPACT<br>of Commitments<br>AND Proposed<br>Development<br>(£000) | 2023 IMPACT<br>of Commitments<br>AND Proposed<br>Development<br>(%) |
|---|---------------------------------|---------------------------------|---|---|--------------------------------------|---|--|---|---|--|---|
| THE GOODSYARD   | -                               |                                 | -   | -                                       | -                                    | 27,135  | -  | -   | 54,270  |  |   |
| LB Hackney Commitments                                    | -                               |                                 | 17,607                                      | -                                       | -                                    | 17,375  | -  | -   | 22,248  |  |   |
| :B Islington Commitments                                  | -                               |                                 | 2,840                                       | -                                       | -                                    | 2,756   | -  | -   | 3,439   |  |   |
| LB Southwark Commitments                                  | -                               |                                 | 39,775                                      | -                                       | -                                    | 39,652  | -  | -   | 51,208  |  |   |
| City of London Commitments                                | -                               |                                 | 3,606                                       | -                                       | -                                    | 3,365   | -  | -   | 4,037   |  |   |
| TOWN CENTRES  |                                 |                                 |   |   |                                      |   |  |   |   |  |   |
| West End (inc. Oxford Street, Regent Street, Bond Street) | 235,678                         | 304,551                         | 211,447                                     | -24,231                                 | -10.3%                               | 201,599   | -34,079  | -14.5%  | 257,111   | -47,441  | -15.6%  |
| Surrey Quays / Canada Water                               | 61,358                          | 79,289                          | 60,125                                      | -1,233                                  | -2.0%                                | 59,941  | -1,418   | -2.3%   | 77,250  | -2,039   | -2.6%   |
| Dalston / Kingsland Road                                  | 30,926                          | 39,963                          | 28,570                                      | -2,356                                  | -7.6%                                | 28,436  | -2,489   | -8.0%   | 36,571  | -3,392   | -8.5%   |
| Angel, Islington  | 85,824                          | 110,905                         | 81,215                                      | -4,609                                  | -5.4%                                | 79,715  | -6,110   | -7.1%   | 100,910   | -9,995   | -9.0%   |
| Whitechapel   | 44,521                          | 57,531                          | 44,240                                      | -281                                    | -0.6%                                | 43,240  | -1,280   | -2.9%   | 55,409  | -2,122   | -3.7%   |
| Stratford (excluding Westfield Stratford City)            | 40,665                          | 52,549                          | 40,104                                      | -561                                    | -1.4%                                | 39,891  | -774   | -1.9%   | 51,411  | -1,138   | -2.2%   |
| Westfield Stratford City                                  | 120,938                         | 156,280                         | 116,042                                     | -4,896                                  | -4.0%                                | 108,889   | -12,049  | -10.0%  | 136,933   | -19,347  | -12.4%  |
| Mile End  | 27,355                          | 35,349                          | 27,329                                      | -26                                     | -0.1%                                | 26,819  | -536   | -2.0%   | 33,997  | -1,352   | -3.8%   |
| Hackney Central   | 27,915                          | 36,073                          | 27,307                                      | -608                                    | -2.2%                                | 26,874  | -1,041   | -3.7%   | 33,792  | -2,281   | -6.3%   |
| Canary Wharf  | 29,360                          | 37,940                          | 25,982                                      | -3,378                                  | -11.5%                               | 25,982  | -3,378   | -11.5%  | 33,575  | -4,365   | -11.5%  |
| Beckton   | 24,197                          | 31,269                          | 24,197                                      | 0                                       | 0.0%                                 | 24,083  | -114   | -0.5%   | 31,033  | -236   | -0.8%   |
| SHOPPING CENTRES AND RETAIL PARKS                         |                                 |                                 |   |   |                                      |   |  |   |   |  |   |
| Lakeside  | 25,518                          | 32,975                          | 25,518                                      | 0                                       | 0.0%                                 | 25,263  | -255   | -1.0%   | 31,986  | -989   | -3.0%   |
| Beckton Retail Parks                                      | 44,304                          | 57,251                          | 43,100                                      | -1,204                                  | -2.7%                                | 42,279  | -2,025   | -4.6%   | 53,934  | -3,317   | -5.8%   |
| Tottenham Retail Parks                                    | 25,378                          | 32,795                          | 25,378                                      | 0                                       | 0.0%                                 | 24,943  | -435   | -1.7%   | 31,239  | -1,556   | -4.7%   |
| Other   | 314,901                         | 406,927                         | 294,455                                     | -20,446                                 | -6.5%                                | 290,601   | -24,300  | -7.7%   | 371,295   | -35,632  | -8.8%   |

Note: The household survey has not captured the full catchment or turnover of all centres, as these are significantly wider than the survey area, particularly for large centres such as the West End, Surrey Quays/Canada Water, Canary Wharf and Westfield Stratford City which have much higher total turnovers. As such, the impact identified on these stores is substantially overstated.

**The Goodsyard**  
**Comparison Retail Impact Assessment**

**Comparison Impact Summary by Total Turnover**

**Table 21**

|   | 2013 Turnover from<br>Study Area<br>(£000) | 2013 Inflow<br>Turnover from<br>Outside the Survey<br>Area<br>(£000) | 2013 Total Turnover<br>Estimate<br>(£000) | 2018 Turnover from<br>Study Area<br>(£000) | 2018 Inflow Turnover<br>from Outside the<br>Survey Area<br>(£000) | 2018 Total Turnover<br>Estimate<br>(£000) | % Impact of<br>Commitments AND<br>Proposed<br>Development at 2018 | 2023 Turnover from<br>Study Area<br>(£000) | 2023 Inflow Turnover<br>from Outside the<br>Survey Area<br>(£000) | 2023 Total Turnover<br>Estimate<br>(£000) | % Impact of<br>Commitments AND<br>Proposed<br>Development at 2023 |
|---|--|--|---|--|---|---|---|--|---|---|---|
| <b>TOWN CENTRES</b>                                       |  |  |   |  |   |   |   |  |   |   |   |
| West End (inc. Oxford Street, Regent Street, Bond Street) | 184,623                                    | 7,315,377  | £7,500,000                                | £235,678                                   | £7,315,377  | £7,551,054                                | -0.5%   | £257,111                                   | £7,315,377  | £7,572,487                                | -0.6%   |
| Surrey Quays / Canada Water                               | 48,221                                     | 28,876   | £77,096                                   | £61,358                                    | £28,876   | £90,234                                   | -1.6%   | £77,250                                    | £28,876   | £106,126                                  | -1.9%   |
| Dalston / Kingsland Road                                  | 24,845                                     | 59,250   | £84,095                                   | £30,926                                    | £59,250   | £90,176                                   | -2.8%   | £36,571                                    | £59,250   | £95,821                                   | -3.5%   |
| Angel, Islington  | 66,400                                     | 102,090  | £168,490                                  | £85,824                                    | £102,090  | £187,914                                  | -3.3%   | £100,910                                   | £102,090  | £203,000                                  | -4.9%   |
| Whitechapel   | 35,153                                     | 4,775  | £39,927                                   | £44,521                                    | £4,775  | £49,295                                   | -2.6%   | £55,409                                    | £4,775  | £60,184                                   | -3.5%   |
| Stratford (excluding Westfield Stratford City)            | 32,228                                     | 36,953   | £69,180                                   | £40,665                                    | £36,953   | £77,617                                   | -1.0%   | £51,411                                    | £36,953   | £88,364                                   | -1.3%   |
| Westfield Stratford City                                  | 95,297                                     | 828,479  | £923,776                                  | £120,938                                   | £828,479  | £949,417                                  | -1.3%   | £136,933                                   | £828,479  | £965,412                                  | -2.0%   |
| Mile End  | 21,554                                     | 5,446  | £27,000                                   | £27,355                                    | £5,446  | £32,800                                   | -1.6%   | £33,997                                    | £5,446  | £39,443                                   | -3.4%   |
| Hackney Central   | 22,282                                     | 19,477   | £41,759                                   | £27,915                                    | £19,477   | £47,392                                   | -2.2%   | £33,792                                    | £19,477   | £53,269                                   | -4.3%   |
| Canary Wharf  | 23,101                                     | 81,172   | £104,273                                  | £29,360                                    | £81,172   | £110,532                                  | -3.1%   | £33,575                                    | £81,172   | £114,747                                  | -3.8%   |
| Beckton   | 18,979                                     | 33,032   | £52,011                                   | £24,197                                    | £33,032   | £57,229                                   | -0.2%   | £31,033                                    | £33,032   | £64,065                                   | -0.4%   |
| <b>SHOPPING CENTRES AND RETAIL PARKS</b>                  |  |  |   |  |   |   |   |  |   |   |   |
| Lakeside  | 19,981                                     | 258,624  | £278,606                                  | £25,518                                    | £258,624  | £284,142                                  | -0.1%   | £31,986                                    | £258,624  | £290,610                                  | -0.3%   |
| Beckton Retail Parks                                      | 34,860                                     | 105,006  | £139,866                                  | £44,304                                    | £105,006  | £149,310                                  | -1.4%   | £53,934                                    | £105,006  | £158,940                                  | -2.1%   |
| Tottenham Retail Parks                                    | 20,064                                     | 117,224  | £137,288                                  | £25,378                                    | £117,224  | £142,602                                  | -0.3%   | £31,239                                    | £117,224  | £148,463                                  | -1.0%   |
| Other   | 247,895                                    | -  | £247,895                                  | £314,901                                   | -   | £314,901                                  | -7.7%   | £371,295                                   | -   | £371,295                                  | -9.6%   |

Note: This table sets out the total turnovers of the centres (from both within and outside the telephone survey area).

Note: Assumes constant levels of inflow from outside the survey area, therefore is a conservative assumption that does not account for potential increases in market share and expenditure up to 2023. As a result the total impact on centres such as Surrey Quays, where significant growth is envisaged over the plan period, is overstated.

Note: No published turnover figures for Mile End Neighbourhood Centre are available, therefore we assume that the centre comprises c.6,000 sqm comparison floorspace achieving a turnover of £4,500

ballymore.



Hammerson