

SECTION 6

RETAIL AND TOWN CENTRES

- 6.1 Town centres play an essential role in community life and are intrinsic to perceptions of places. National planning policy states that town centres should be recognised as the heart of their communities, and Local Plans should pursue policies to support their viability and vitality. Town centres bring people together to shop, do business, and enjoy leisure time, and can also be a place to live. Medway has a complex geography with five towns, and many neighbourhood, local and village centres at a smaller scale. There is also a district centre at Hempstead Valley, which has a good presence of major retailers.
- 6.2 There have been radical changes to how we shop over recent decades, notably the rise in online shopping. These trends have led to changes in our traditional high streets, with decline in some town centre and the closure of many retailers. Changes to permitted development rights have extended the ability to change the use of buildings in town centres, such as from shops to restaurants and homes. Retailers have shown more interest in developing in out of centre locations, such as retail parks, rather than in town centres. Local people in Medway have raised concerns about the health and attractiveness of the main centres, and have asked that the Local Plan address decline in areas such as Chatham, Gillingham and Strood. This is central to the plan's vision and strategic objectives for economic success, environmental wellbeing and quality of life. The Medway 2035 regeneration strategy also promotes a strong and revitalised role for town centres.
- 6.3 Medway Council commissioned a North Kent Retail Study⁶² in collaboration with Gravesham Borough Council as part of the evidence base for the new Local Plan. The findings for Medway recommended the following:
- A need for 46,100m² comparison floorspace by 2031 and 70,500m² by 2037⁶³
 - A need for 12,300m² of convenience retail floorspace by 2031 and 13,200m² by 2037⁶⁴
 - There is anticipated to be a growing spend in leisure (£237million), predominantly commercial leisure (restaurants and cafes) over the plan period. Medway's centres should focus on developing their evening economy to capture some of this spend.
- 6.4 In addition to the work commissioned in the Medway Retail Needs Assessment, the council has surveyed town, neighbourhood, local and village centres across Medway to inform policies and allocations in the new Local Plan.
- 6.5 In terms of specific advice for each of the centres, the North Kent Study advised that Chatham remains at the top of the hierarchy and should be the main location for

⁶² GVA, 'Retail and commercial leisure assessment', North Kent SHENA, Volume 1: Nov 2016, Available at : <https://www.medway.gov.uk/pdf/with%20Gravesham%20caveat%20NKSHENA%20Retail%20Vol%201%20Main%20Rept%20FINAL%20NOVEMBER%202016.pdf>

⁶³ This figure does not include commitments for floorspace

⁶⁴ This figure includes commitments for floorspace

additional comparison retail growth. No further comparison retail was recommended for any of the other centres. In order to improve Chatham it is recommended that:

- public realm works be undertaken to improve its appearance,
- sites are actively brought forward,
- further opportunities for convenience retail are explored,
- improve and plan for a stronger evening economy through commercial leisure provision; and
- resist out-of-centre proposals.

6.6 More specifically, the following recommendations were made for the remaining centres on the back of retaining the hierarchy of centres with Chatham at the top:

- Hempstead Valley: modernise and support day-to-day uses
- Rochester: consolidate rather than expand. Protect the primary shopping area (PSA) and provide a small foodstore if a site becomes available. Consider a cap on the provision of restaurants and cafes in order to protect the retail core.
- Strood: improve integration between the retail park and District Centre, and improve the public realm. No further expansion is recommended.
- Gillingham: Consider redevelopment of the former Budgens store.
- Rainham: Focus on refurbishing and/or redevelopment. Consider an additional foodstore if a site should become available.

Retail Strategy

6.7 Medway Council is committed to securing healthy and vibrant town and local centres to meet community needs, provide choice, and as an important component of our local economy. Town centres are key to sustainable development, as the cluster of services can minimise the need to travel, and they are well located in relation to a range of transport options.

6.8 Through the Local Plan, it will set out a strategy by which these ambitions can be met. The strategy aims to strengthen its centres through directing and retaining spend in the defined town centres, and managing proposals in inappropriate locations that would dilute the role and viability of the town centres. This may include clawing back some trade being lost to locations outside Medway. The strategy will also seek to manage other retail designations and larger retail locations to ensure each functions appropriately and complementary to the defined centres.

6.9 The Development Strategy options set out in Section 3 indicate that urban regeneration sites will form the foundation of the plan's growth. These offer opportunities to strengthen the role of town centres, including increasing the supply of housing and wider commercial and leisure activities. This approach would drive up footfall in town centres. The proposal for a rural town on the Hoo Peninsula would require specific development of a retail offer in line with the character and function of a small country town. Potential development in suburban areas would be required to avoid damaging the role of existing town centres. However dependent upon the scale

of growth, there may be need to invest in new retail to provide a local centre so that residents can easily access local services.

Retail Hierarchy

- 6.10 Medway has a number of different centres, ranging from a city centre function in Chatham; the district centres in the main towns and at Hempstead Valley shopping centre; and many local, village and neighbourhood centres. The North Kent Retail Study has confirmed Chatham's role at the top of the retail hierarchy supported by district centres and local centres and is consistent with national guidance. Further in-centre surveys and retail evidence⁶⁵ updates supports these findings. This hierarchy provides a network of supporting centres to provide for the needs of the local population in a sustainable way.
- 6.11 Chatham has the largest number of comparison retail units, the largest retail floorspace, and is connected by a good transport hub and parking provision. The council recognises the need for a review of parking and signage to ensure that there is clear information about parking availability. This could help address perceptions that car parking can be difficult or in unsecure locations. Recent surveys have confirmed that people generally visit Chatham for comparison retail shopping. The district centres are distinctive with their own strengths and weaknesses, and need careful management to provide complementary offers and a healthy competitive environment. These district centres provide an important local and convenience function.
- 6.12 The retail hierarchy will clarify the sequential approach for prioritising and directing development to main town centres, and provide guidance on the approach for the requirement of new centres emerging from the plan's development strategy.

Policy RTC1: Retail hierarchy

The function of centres as multi-purpose destinations and the main locations for retail, community, leisure and employment will continue to be supported in relation to their individual role and scale. Chatham is the primary centre at the top of the hierarchy and will be the focus for the majority of comparison retail to meet the strategic needs for the authority and maintain its role in the hierarchy.

Medway's hierarchy of centres is:

I. Principal Town Centre: Chatham is the main location for comparison retail, community uses, leisure, culture and tourism (in support of local heritage assets and cultural focus).

II. District Centres: The Council will seek to maintain a balanced provision of uses appropriate and reflective of the character, scale and role of these centres: Strood, Gillingham, Rainham, Rochester, Hempstead Valley

⁶⁵ GVA, 'Retail and commercial leisure assessment', North Kent SHENA, Volume 1: Nov 2016, Available at : <https://www.medway.gov.uk/pdf/with%20Gravesham%20caveat%20NKSHENA%20Retail%20Vol%201%20Main%20Rept%20FINAL%20NOVEMBER%202016.pdf>

III. Local Centres: The authority seeks to maintain the sustainably accessed local top up shopping offer and to satisfy the day-to day needs of the local population

New local centres or shopping parades compliant with the council's retail policies may be required in the following locations depending on the defined development strategy and proposals maps in the Local Plan, the scale of the proposal.

- Hoo St Werburgh rural town
- Rainham East
- Capstone

Proposals will need to be supported by a robust justification talking into account the existing provision, character and scale of the area and the demographics.

Question RTC1:

Do you consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway?

Question RTC2:

Do you agree with the definition of Chatham as the primary centre at the top of the hierarchy?

Question RTC3:

Do you agree with the identified district centres?

Question RTC4:

How do you consider that Dockside should be recognised in Medway's retail hierarchy?

Question RTC5:

Would you propose any alternative approaches to Medway's retail hierarchy?

Sequential assessment

6.13 Government policy supports the growth and sustainability of town centres through a 'town centre first' approach. This requires a sequential approach in site selection (for proposals not in the town centre and/or not in accordance with the development strategy in the local plan) in identifying the most appropriate location for main town centre uses. Sites in the town centre are considered first and then well connected sites in closest proximity to the town centre where no town in-centre sites have successfully been identified and so on.

6.14 The sequence of undertaking the sequential assessment reflects and supports the town centre strategy, retail hierarchy, and ambitions for each centre. This will ensure a sustainable approach to providing for the needs of the local population and providing the ability to respond to future changes. To achieve this, focus and first priority is given to Chatham to support the Council's ambitions. This is then followed

by Medway's traditional (high street) centres, which are the centres that require an economic uplift, enhancements and diversity in uses to provide choice and competition. Where sites are not available in Chatham, the district centres will be the locations sought to provide a balance of uses. Hempstead Valley Shopping Centre is third on the list, reflecting the stronger economic position and ability in providing for the local population. The Council has supported its growth but recognise that a balance needs to be achieved between all its centres to create a healthy competitive environment and provide for local needs.

- 6.15 Definition of catchment areas is the first step and needs agreement with the council and is dependent on the scale of the proposal and the sphere of influence and trade draw. Through the sequential assessment, the applicant must also demonstrate flexibility in scale and format particularly taking into account of issues of locality. The sequential assessment must be proportionate to the scale of the proposal and/or importance of the site for delivery of the development strategy. Local garages can provide a top up convenience function where a retail use supports the main function. In such circumstances the ancillary nature of the retail use needs to be of appropriate in nature and scale in relation to the predominant use. There may be other circumstances that require an ancillary approach. However, this needs to be carefully managed to prevent impact on centres.

Policy RTC2: Sequential Assessment

Main town centre⁶⁶ uses are directed to Medway's centres as identified in policy RTC1.

Proposals to locate or expand main town centre uses outside of defined centres, and where not in accordance with any part of the retail and main town centre uses strategy in the development plan, are required to demonstrate through a sequential assessment, within an agreed and defined catchment area, that there are no sequentially preferable sites available in accordance with the following sequence:

I. Chatham

II. Strood, Gillingham, Rainham, Rochester

III. Hempstead Valley Shopping Centre

IV. Local centre or edge of centre, whichever is better connected and able to support 1, 2 or 3 listed above

V. Out of centre

When considering sequentially preferable edge and out of centre sites, following demonstration of the unavailability of more central sites, preference will be given to edge and out of centre sites that are accessible and well connected to town centres respectively, i.e. consideration of edge of centre sites first.

⁶⁶ Department for Communities and Local Government, 'National Planning Policy Framework', 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

The catchment area must be defined through discussions with the authority at the earliest opportunity and is dependent on the scale and type of the proposal and its ability to draw trade.

Large scale leisure proposals must be accessed by sustainable means, not have a negative impact on traffic and provide ease of access.

Proposals for ancillary development are required to be compliant with the policy set out above unless it can be:

- Justified as ancillary and necessary for the business operation;
- the type of use and scale of the proposal is secondary to the predominant/main use;
- demonstrated that there are dependencies between the proposal and the predominant/main use. Consideration will be given to the location of the proposal in relation to the predominant/main use;
- it may be necessary to manage the ancillary use through condition to maintain its secondary nature

The scale of the proposal may also require an impact assessment and therefore requires compliance with policy RTC3 where it meets the criteria.

Question RTC6:

Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?

Do you agree with the proposed sequential approach?

Would you propose alternative approaches?

Retail impact assessment thresholds

6.16 A range of factors, including recessions, the growth in online shopping, and the relocation and consolidation of main 'anchor stores' have left our high streets in a vulnerable position forcing a refocus of the role and function of our centres. The development of Bluewater shopping centre has had major impacts across a wide area, especially north Kent. The North Kent Retail Study concluded the underperformance of Chatham and the vulnerability of centres including Rainham, Strood and Gillingham. These centres have limited national retailer representation and are typified by low value/order retailer representation and a sub-standard public realm reflective of the lack of investment and a vulnerable local economy. The health of Medway's centres suffers while out of centre localities prove more viable and desirable. It is likely that further out of centre permissions will exacerbate the vulnerability and have a lasting detrimental impact on our centres. In contrast, Hempstead Valley has seen increased interest and recent investment in extending its offer.

6.17 The spending patterns indicate that a significant amount of trade is being lost to locations outside of Medway, particularly to Bluewater. Consumer choice is suffering,

with the comparison sector experiencing a low level of expenditure retention. Medway's centres may not be able to claw back a significant amount of trade, but by protecting and strengthening its centres and giving priority to all retail designations, healthier centres can be created to support the needs of the local population. There are stronger signs of market interest at Hempstead Valley, and a key consideration for the Local Plan, is the extent to which further development should be supported at this centre. Hempstead Valley could provide competition and choice for Medway residents, from external shopping centres, such as Bluewater. However growth at Hempstead would be seen to impact upon town centres, particularly Gillingham and Chatham.

- 6.18 When assessing applications for retail, leisure and office development outside town centres not in accordance with an up to date Local Plan, local authorities are expected by national policy to require an impact assessment with the application of either a locally defined threshold or the national set threshold of 2,500sqm. Proposals to date have relied upon the national threshold in absence of a locally defined threshold. 2,500sqm represents a large scale and quantity of floorspace compared to the typical size of units in each centre and would therefore have a significant impact. It is therefore too large to reflect the local context. In addition the cumulative impact of out of centre proposals will also have a resounding impact on the health of centres in Medway. Monitoring of retail developments in Medway⁶⁷ show that recently more planning permissions for A1 uses in out of centre locations compared to in town centres. This aligns with market demand being stronger in locations such as Hempstead Valley.
- 6.19 Given the vulnerability and regeneration initiatives for some of Medway's town centres, it is important that there is appropriate protection from the threat of trade being drawn to out of centre locations, and that a locally determined retail impact threshold be set. This will be defined by further detailed analysis of centres and the development strategy defined for the Local Plan.

Policy RTC3: Impact Assessments

Proposals that seek to locate or expand retail and other main town centre uses in edge or out of centre locations will be permitted where:

- a) it is supported by an impact assessment where proposals for comparison, convenience retail, or commercial leisure development exceeds a defined threshold set in the Local Plan; or other large scale leisure and office uses exceeds 2,500sqm.
- b) it is demonstrated that it would not have a significant adverse impact on:
 - Impact on the strategy - development, retail and main town centre uses strategy
 - Impact on vitality and viability of centres within the catchment of the proposal
 - Impact on existing, planned or committed town centre investment
 - Consideration is given to the cumulative impact of proposals considered relevant and to the health of centres

⁶⁷ See Medway Authority Monitoring Reports:

<http://www.medway.gov.uk/planningandbuilding/planningpolicy/authoritymonitoringreport.aspx>

- Consideration is given to the local context and the vulnerability of the authority's centres
- c) Where appropriate development proposals may be conditioned to reduce the impact on centres where there is an impact but is not considered significantly adverse to justify refusal.

Question RTC7:

Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?

Question RTC8:

Do you agree with the proposed approach to impact assessments?

Question RTC9:

What do you consider would represent an appropriate size threshold for developments to undertake an impact assessment?

Would you propose alternative approaches?

Frontages

6.20 Shop frontages play a key role in attracting footfall to centres. Very often the impact and value of frontages are ignored or underestimated. In Medway, the retail evidence⁶⁸ collated has confirmed the public's perception and observation of the centres public realm as needing improvements. Concerns about security often result in the use of grilled shutters that can detract from the quality of the public realm. Solid shutters can harm the appearance of centres, providing dead frontages, encouraging graffiti and, out of retail hours, create the perception of threatening and unsafe places to be. Centres also lack appropriate design guidance reflective of their distinct character. Improving the shop facades and public realm, where possible, forms part of the strategy to strengthen the authority's centres, attract more footfall and improve the local economy.

Policy RTC4: Frontages

Proposals within frontages of centres must be in accordance with the council's design policies and:

- provide an active frontage at ground floor level, which is accessible and attractive to pedestrians. The presence of a larger proportion of show window space is required.

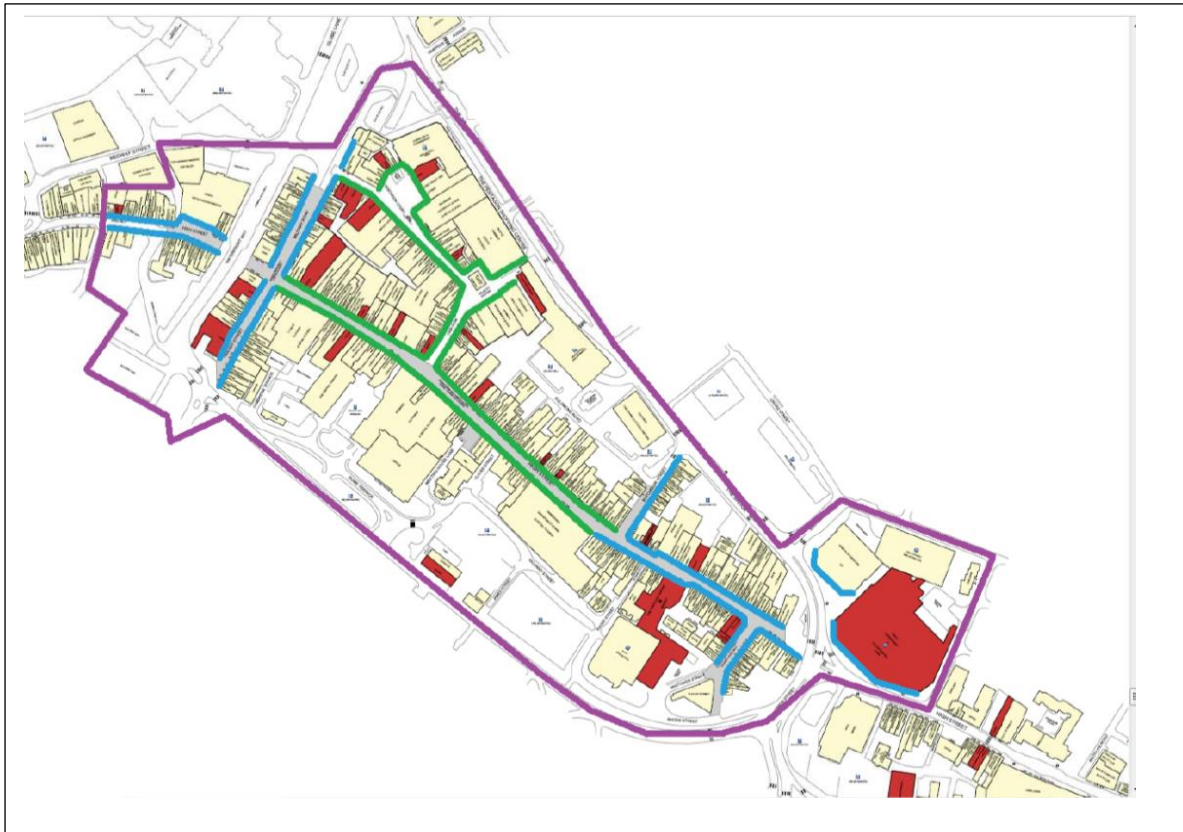
⁶⁸ GVA, 'Retail and commercial leisure assessment', North Kent SHENA, Nov 2016, Available at : <https://www.medway.gov.uk/pdf/with%20Gravesham%20caveat%20NKSHENA%20Retail%20Vol%201%20Main%20Rept%20FINAL%20NOVEMBER%202016.pdf>

- be of appropriate scale, format, design and character reflective of the facades above ground floor, the centre's role and function and the Council's ambitions as set out in RTC1 and RTC5
- Protect and where possible enhance the public realm through well planned and coordinated planting, improvements to surfacing/paving and other environmental enhancements.
- Must demonstrate no harm to other neighbouring businesses, residential public and visual amenity through impacts such as noise, light, odour, late night activity, litter and general disturbance.
- Any proposals for shutters must maintain views into shops when closed, be back lit, powder coated and any housing should relate well to shop frontage and signage.

Definition of primary and secondary frontages

- 6.21 The NPPF requires Local Plans to define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages. The council will define town centre boundaries in the draft Local Plan, informed by further assessment and evidence, including site allocations. The council welcomes comments during this round of consultation on proposals for defined boundaries for Medway's town centres.
- 6.22 The North Kent study undertook an audit of uses in each of Medway's centres and made recommendations for primary and secondary frontages. The definition of these designations is fundamental to the consideration of planning applications in relation to the sequential approach for locating main town centre uses and ultimately to support the health of our centres. Policies to protect our centres will be based on these designations. The North Kent Study recommendations for primary and secondary frontages will be used as a basis to gauge the principle of these designations and the application of policy approaches in RTC5 below. In the maps below the designations are represented as follows:
- **Primary frontages (Green):** Includes a high proportion of retail uses which may include food, drinks, clothing and household goods. Will contain a higher representation of A1 use class.
 - **Secondary frontages (Blue):** Provide greater opportunities for a diversity of uses, such as restaurants, cinemas and businesses. Will contain a lower representation of A1 use class.
 - **Retail core (purple):** represented as a retail designation captured in the 2003 Local Plan and only used here for illustrative purposes.
 - **Vacant units (Red):** as at the time of survey in 2016.

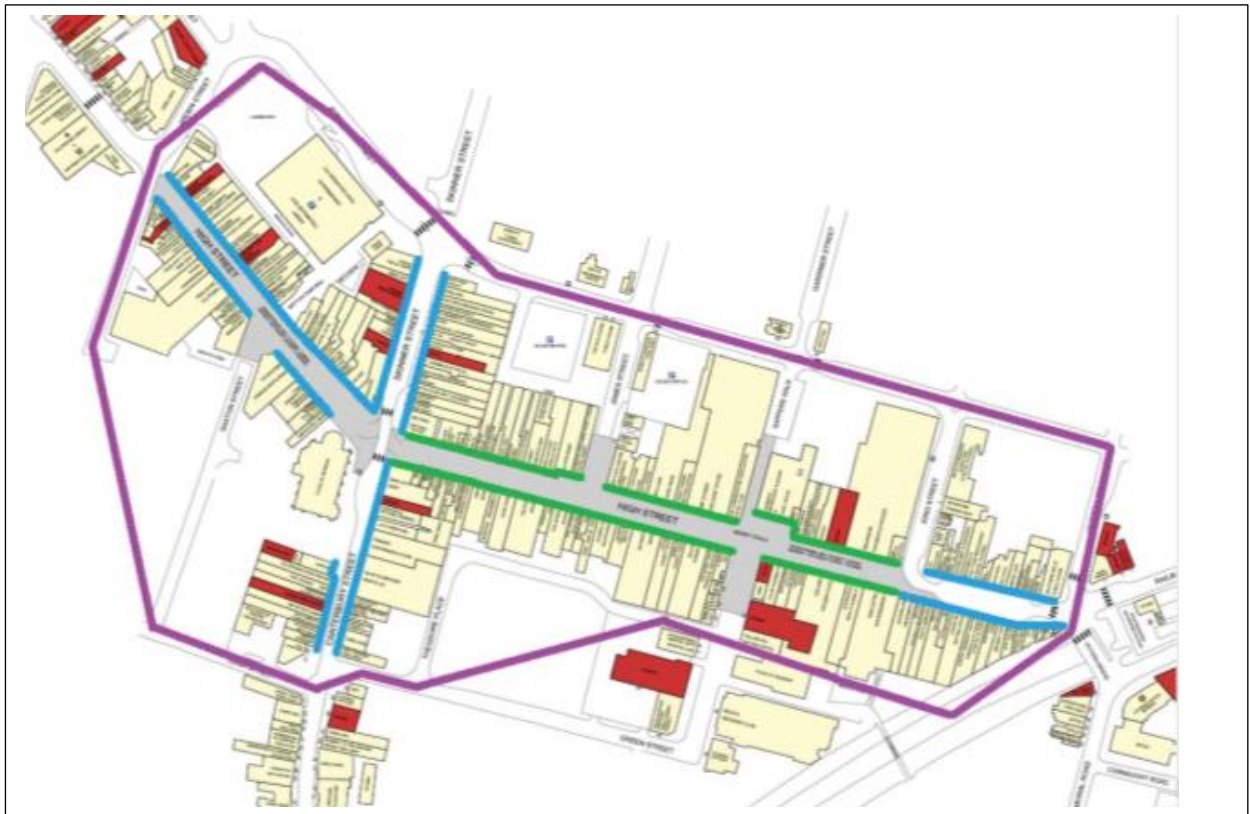
Retail Designation 5a: Chatham City Centre



Retail Designation 5b: Strood District Centre

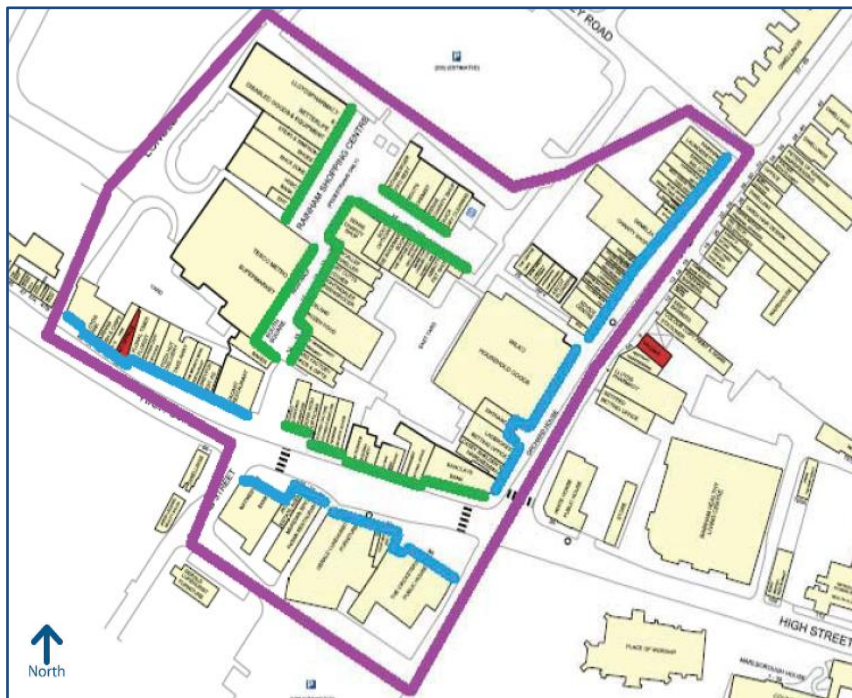


Retail Designation 5c: Gillingham District Centre



Retail Designation 5d: Rainham District Centre

Rainham District Centre



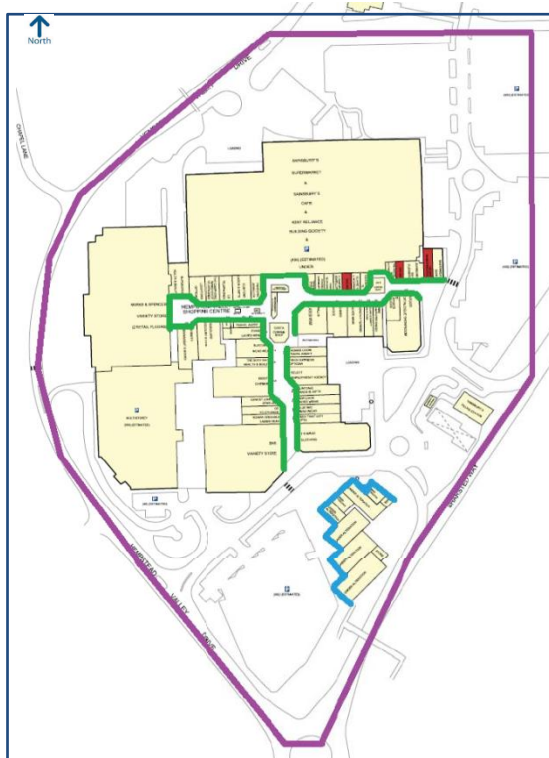
Retail Designation 5e: Rochester District Centre

Rochester District Centre



Retail Designation 5f: Hempstead Valley District Centre

Hempstead Valley



Role, Function and Management of Uses

6.23 This considers the defined centres set out in figures 5a to 5f above. The council notes that the town centre boundaries as defined in the 2003 Medway Local Plan may require review as part of the new Local Plan.

Viability

6.24 Viability plays a significant role in identifying the locations where retail proposals are sought, with some out of centre locations providing a more attractive format, placing a threat on the viability and health of our centres, and resulting in vacancies. The relocation of main anchors coupled with online shopping have left our high streets in a vulnerable position forcing a refocus of the role and function of our centres.

Evening economy⁶⁹

6.25 Centres are multi-functional with operations across day and evening time. A number of Medway's centres lack or have a limited evening offer. Current evidence⁷⁰ shows a focus on leisure provision in support of the evening economy as a current trend. Commercial leisure, such as restaurants and cafes, also tend to be a complementary offer to tourist attractions

Health of centres

6.26 The North Kent Retail Study identified that Chatham was underperforming and the vulnerability of centres including Rainham, Strood and Gillingham. Hempstead Valley and Rochester were found to be performing well, reflecting their unique offer. Hempstead Valley is the preferred location of high value national retailers. Recent years have seen expansion of the family oriented leisure offer at Dockside and commercial leisure at Hempstead Valley, which responds directly to the changing market and is fast becoming the focal points for leisure uses. Rochester on the other hand, has a unique offer reflected by its historic setting. There is potential for the role of centres to evolve reflecting the character as set out below:

- **Chatham:** location for comparison retail, community uses and services, cultural & commercial leisure and tourism based uses in support of local heritage assets, developing its evening economy and benefitting from waterfront regeneration.
- **Rochester:** continue as the location as a leisure destination focussed around the heritage assets.
- **Rainham:** continue to support its local function
- **Strood:** remains a convenience retail destination and satisfies a local function. Could potentially be supported by small scale employment – SME and start-up units

⁶⁹ Department for Communities and Local Government, 'National Planning Policy Framework', Section 2, paragraph 23, pg.7, 2015 Available at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁷⁰ GVA, 'Retail and commercial leisure assessment', North Kent SHENA, Nov 2016, Available at :
<https://www.medway.gov.uk/pdf/with%20Gravesham%20caveat%20NKSHENA%20Retail%20Vol%201%20Main%20Rept%20FINAL%20NOVEMBER%202016.pdf>

- **Gillingham:** should this become a student district centre with a focus on some small scale employment provision to collaborate more closely with the universities
- **Hempstead Valley Shopping Centre:** continue to perform a local function and high value shopping destination supported by commercial leisure

6.27 In revisiting the role of our centres to ensure sustainability in the longer term, key assets and characteristics will be identified and supported. This may involve the development of guidance for other centres, which are not the main city and district centres, such as Dockside.

Policy RTC5: Role, Function and management of uses in centres – Frontage

The council seeks to establish a robust, vital and viable retail core in support of competitive, sustainable and healthy centres compliant with its retail policies. A mix of uses is supported with due consideration of avoiding an overprovision or concentration of the same type of uses.

Primary Frontage

Proposals for non-A1 uses within the primary frontages will be supported where reflective of the role, character and function of the centre and/or supportive of an evening economy provided the provision of A3 uses do not result in an over concentration in Rochester District Centre.

Where the proposal results in the loss of A1 premises, permission will be granted where:

- i. it is consistent with the policy above.
- ii. in all other cases the unit has remained vacant for at least 6 months and the applicant can demonstrate:
 - reasonable⁷¹ attempts were made without success to let the premises for A1 use;
 - that the proposed use will make a positive contribution toward the vitality and viability, balance of uses and/or evening economy of the centre.

Greater efficiency in the use of upper floors will be supported and encouraged.

Secondary Frontage

Proposals for non-A1 uses within the secondary frontages will be supported where reflective of the role, character and function of the centre and/or supportive of an evening economy and where provision of A3 uses does not result in over provision in Rochester district centre.

Where the proposal results in the proportion of A1 representation falling below the threshold defined by the council and/or results in the loss of A1, A3, D2, community and cultural uses, permission will be granted where:

- reasonable⁶ attempts were made without success to let the premises for the last use

⁷¹ Advertised at least twice reflecting changes in adverts to demonstrate flexibility and capture retailer requirements

- the proposed use will make a positive contribution toward the vitality and viability, balance of uses and/or evening economy.

Question RTC10:

Do you agree that this proposed approach represents an effective approach to planning for the city and district centres in Medway?

Question RTC11:

Do you consider that changes are required to the town centre boundaries as defined in the figures 5a to 5f above?

Question RTC12:

Do you agree with the classification of primary and secondary shopping frontages as shown in figures 5a to 5f above?

Question RTC13:

Do you consider that there are alternative approaches to manage this aspect of Medway's main centres?

Temporary uses

6.28 Temporary permissions with time specific restrictions can address long standing vacancies in centres. Temporary uses can also provide interest for visitors and therefore have value in stimulating footfall, creating a positive image and adding to the vitality of the High Street However, the wider objective of securing uses more appropriate for the location is an overriding consideration.

Policy RTC6: Temporary uses

Proposals for a temporary use of vacant units within town and local centre frontages will be supported for a period of up to 6 months where compliant with the council's design and retail policies and:

- where the unit has been vacant for at least 2 months;
- where the proposed use makes a contribution to the vitality and viability of the centre;

Erection of structures for the operation of the business must be easily removable

Temporary permissions will only be renewed for a single additional period where:

- The original temporary permission was granted for a period of less than 4 months
- Reasonable attempts were made to let the premises without success
- The current temporary use can demonstrate benefit to the centre and success of business.

Question RTC14:

Do you agree that this proposed approach represents an effective approach to planning for temporary uses in centres in Medway?

Would you propose alternative approaches?

Supporting sustainable and healthy centres

- 6.29 Some types of retail uses have the potential for a problematic cumulative impact when there is an overconcentration in one place. Such specific uses can include places like betting shops; premises selling alcohol, particularly for consumption off the premises; some gaming centres with gambling machines, and some hot food takeaways or dessert restaurants, which tend to sell food high in fat and/or sugar. They can contribute to health issues and may undermine the attractiveness of the High Street. The council sees a robust retail offer as the core of successful town centres. The Local Plan also has a role in addressing health inequalities in Medway. Together these indicate that policy should seek to manage the range and location of particular businesses, as part of wider initiatives to promote public health and wellbeing and secure the vitality of town centres.
- 6.30 The council considers that there are grounds to identify areas⁷² that are at risk of being placed under stress resulting from the cumulative impact of concentrations of specific premises. Evidence on the location and number of existing uses that may undermine the health of the High Street can provide guidance on where further premises of the same type should be restricted or managed. In preparing policy for the draft Local Plan, the council seeks views on how it should approach this matter.

RTC7: Supporting Sustainable and Healthy centres

Development proposals will help to create healthy and sustainable places⁷³, recognising the cumulative effect individual units and specific uses can have on the success of places.

The council will seek to manage the concentration and mix of specific premises to strengthen its centres and support healthier communities.

⁷² Cumulative Impact policy applicable to Gillingham, Chatham, Luton and Rochester. Stress areas identified.
<https://democracy.medway.gov.uk/mgConvert2PDF.aspx?ID=3440&T=10>

⁷³ Department for Communities and Local Government, 'National Planning Policy Framework', Section 2, paragraph 23, pg.7, 2015 Available at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

Question RTC15:

Do you agree that development of specific uses should be restricted where it could result in an unhealthy and unsustainable overconcentration of premises in one area?

Question RTC16:

The council considers such specific uses to include 'high energy density food' outlets, which sell foods high in fat and/or sugar; betting shops; gaming centres; and premises selling alcohol, particularly for off licence sales. Do you agree with this definition? Do you think that the list should be amended?

Question RTC17:

Do you think that the council should introduce a maximum percentage for units in an area that are allowed for use by the specific businesses noted above?

Question RTC18:

Do you think that such uses should be restricted near schools and youth facilities?

Question RTC19:

Do you think that the council should not set policy in this area, but rather consider proposals for such uses on a case by case basis?

Hempstead Valley Shopping Centre

- 6.31 Hempstead Valley district centre is unique amongst the Medway centres in that it comprises, in its entirety, a purpose-built indoor shopping centre. Although a district centre in retailing terms, the relative shortage of non-retail facilities means that Hempstead Valley functions in a different way to the 'traditional' district centres of Strood, Gillingham and Rainham. There is ample free surface level car parking and has advantages over the 'traditional' town centres in Medway that expansion / reconfiguration is much easier for modern stores. It has seen stronger levels of market interest in recent years from retailers wishing to expand in this location.
- 6.32 Hempstead Valley shopping Centre is a healthy centre and has seen more proposals for expansion with a particular focus on commercial leisure uses. The North Kent retail study recommended a need for modernisation and provision of service oriented uses. The study concluded that there was no qualitative need for additional comparison and convenience retail provision. It also raised concerns over the potential for additional space to have a detrimental impact upon Chatham town centre. It is likely that Hempstead Valley Shopping Centre has the highest convenience goods turnover and is second to Chatham in having the highest comparison goods turnover. Therefore, whilst the shopping centre does provide a focus for the population living in the southern part of Medway and also helps to retain

shopping trips, there is strong case for a policy approach which manages how Hempstead Valley evolves over the life of the Plan in order to protect other town centres. It is considered that a criteria based approach to assessing retail and leisure development within the centre boundary would provide a sound approach. There are also potentially conflicting considerations on how best to manage the role of Hempstead Valley, given the draw of Bluewater on Medway's retail spend.

RTC8: Hempstead Valley District Centre

Hempstead Valley is different to the other traditional centres with high streets. The council recognises that it provides for local needs and therefore supports the modernisation and growth of this where supportive of this local function.

Further retail and leisure development, appropriate to the character and role of the centre will be supported, following a sequential or impact test, where it can be demonstrated that it does not undermine the viability of main town centres in Medway.

Question RTC20:

Do you consider this is the appropriate approach to planning for Hempstead Valley shopping centre?

Question RTC21:

Do you think that further developments at Hempstead Valley should be restricted, so that greater priority is given to retail and leisure in the main town centres in Medway?

Question RTC22:

Do you support a policy approach that seeks to achieve a balance of uses across all centres in Medway?

Dockside

6.33 Dockside Outlet Centre contains 'outlet' stores (generally selling discounted/past season stock) from a range of national multiple retailers. The main 'anchor' to the centre is a Marks & Spencer Outlet store, and there is a mix of operators. The centre also contains number of food outlets. Immediately adjacent to the Dockside Outlet Centre is a cluster of leisure and tourism uses, including an eight-screen cinema, and a number of family dining restaurants. These uses are also complemented by a nearby hotel. There is no cinema located in any of the town or district centres in Medway, and relatively limited representation from national commercial leisure operators. Therefore Chatham Dockside represents the principle 'hub' for this type of activity in Medway with the exception of Medway Valley Leisure Park. The Dockside area focuses as a distinct cluster of retail and commercial leisure activity, attracting both visitors and local residents.

- 6.34 This area has grown over the years and is evolving and responding to the changing market conditions. The Universities at Medway campus is close by, and there are a number of commercial buildings in the area. The substantial growth in and around Chatham Maritime and Gillingham Pier and future plans for development also has an influence in considering the role of this area as part of the plan's strategy. Consideration is given to its role as a family leisure destination, and the future role it could play to sustainably provide for local needs in this area.
- 6.35 The council recognises the role of Dockside as a family leisure destination, and will protect this function in the new Local Plan. It is collating further evidence to assess the appropriate future role of Dockside, and in consulting on this plan, is seeking views on what form and scale of further development would be suitable for the area.

Question RTC23:

Do you support a policy approach that recognises the family leisure role of Dockside?

Question RTC24:

What do you think is the appropriate approach to further growth? Should policy only allow a small amount of new 'convenience' retail, or support a wider range of services and shops to develop its role as a local centre?

Medway Valley Leisure Park

- 6.36 Medway Valley Leisure Park is another leisure destination within Medway with a cinema and contains a bowling rink, restaurants and hotel. There is limited potential for further expansion of this offer in this location. In addition, the retail strategy is to direct leisure to centre locations to support cultural assets and tourism as well the evening economy. It is therefore important that this area is managed appropriately.

Policy RTC9: Medway Valley Leisure Park

Medway Valley Leisure Park is a family leisure destination that attracts visitors and residents in the area.

The council's retail policy directs all leisure uses firstly to Medway's centres. Development proposals will be supported where enhancing current provision without requiring expansion beyond the designated boundary, subject to compliance with the council's retail policies:

- satisfying that no sequentially preferable sites were found;
- that the impact assessment has been satisfied where triggered

Question RTC25:

Do you consider that this is an appropriate approach to planning for Medway Valley Leisure Park?

Question RTC26:

Do you think that there should be a specific policy to manage the development of Medway Valley Leisure Park, or if proposals should only be determined by use of wider retail policies?

Local centres

- 6.37 National guidance recognises the importance of providing local shops to satisfy the needs of local communities. Local planning authorities are required to plan positively for local shops to enhance the sustainability of communities and guard against unnecessary loss of valued facilities and services. Local centres play an important role in creating the aspirations for a high quality built environment and strong, vibrant and healthy communities⁷⁴. It is necessary to support sustainable living patterns and smaller centres play a bigger role in rural areas. The council recognises the key role of services in villages, and the higher dependency of rural residents on local services. Smaller centres are a meeting place and support community cohesion. Support and protection of these centres are therefore vital to support the day to day activities of residents and the sustainability of settlements and communities⁷⁵.
- 6.38 At the heart of the policy approach is the aim to support a sustainable way of living. Officers are reviewing centres to determine the current condition of all centres in Medway. The assessment will confirm which could be designated as local centres and where boundary reviews are required to reflect changes. The next version of the draft Local Plan will provide a list of centres with proposed boundary changes.

Policy RTC10: Healthy sustainable communities

The council will support the provision of services and facilities, in accessible locations, to support the day-to-day activities of residents in a sustainable manner. Considerations of sustainability will include the offer (balance of retail, community uses and services), and accessibility - the mode of travel and distance.

The council recognises the importance of local services in villages as critical to sustainable rural communities.

Question RTC27:

Do you agree with this proposed approach to sustainable communities?

What alternative approaches would you suggest?

⁷⁴ Department for Communities and Local Government, 'National Planning Policy Framework', Section 2,8,11, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁷⁵ *ibid* 74

6.39 Local, village and neighbourhood centres play a local role and as such should not contain uses of large scale, form or massing. The scale of provision should be appropriate to the location and the function for local services. Cinemas, drive through restaurants, concert halls etc. are therefore not appropriate for smaller centres. Smaller centres are fundamentally based on their retailing role, but also perform a community function.

RTC11: Local Centres and shopping parades

Uses within a defined local centre or smaller shopping parades must be appropriate to the scale, character and role of the centre or parade, be compliant with the council's retail policies and include the following uses to support the core function:

- Convenience retail offer to provide top up shopping
- Community uses (such as hall, library, notice board)
- Services (such as hairdressers, cash machines)
- provide convenience for local communities (allowing various activities to be undertaken)

Proposals resulting in the loss of the core uses listed above will be permitted in local centres and shopping parades where in compliance with the council's retail policies:

- it is demonstrated that the loss is mitigated by similar uses of community value in close proximity;
- it is demonstrated that the proposed use would make a positive contribution to the vitality and viability and balance of uses in the centre and is of appropriate scale and character;
- the unit has remained vacant for at least 6 months and can be demonstrated that reasonable attempts have been made, without success, to let or sell the premises for a shop or community use.

Question RTC28:

Do you consider that this is the appropriate approach to planning for small retail areas?

Do you think that it would be better if there were no specific policy for local centres and shopping parades, and development proposals were considered on a case by case basis?

Retail Warehousing

6.40 The NPPF makes clear that proposals for new main town centre uses, including retail, should be located by preference within or on the edge of town centres. It also advises local authorities to set policies for the consideration of proposals which cannot be accommodated in such locations. Retail parks form part of this bigger picture and can provide a supportive role to centres if located in appropriate locations

and the uses are managed to address potential conflict or impact on neighbouring centres.

- 6.41 Retail parks have traditionally had specific characteristics based around the type of uses, the format and scale of provision, the location, access and parking requirements. However, time has moved on and so has national guidance. Whilst provision in all parks remains predominantly large scale at present and broadly consistent with the traditional retail park characteristics, recent planning permissions have resulted in the provision of smaller units and uses considered complementary such as cafes and hot food takeaways/restaurants. This appears to be a wider national trend.
- 6.42 'Gillingham Retail Park' demonstrates characteristics of a retail park following a complicated history. It now has occupation of units by high street convenience and comparison retailers, and is therefore not wholly compliant with the criteria consistent with the traditional retail park. Recent planning applications have also seen a rise in proposals for further open A1 planning applications and the identification of uses that would be better suited to a town centre location.
- 6.43 The North Kent Retail Study found the retail locations outside of Gillingham District Centre are performing much better than the district centre itself. This includes retail provision in 'Gillingham Retail Park' and the nearby Tesco Extra store. Links between the vulnerability and health of Gillingham District Centre and the well performing Gillingham Retail Park and accompanying Tesco Store on Courtney Road were drawn in the study. A similar trend was noted in Strood, i.e. Strood Retail Park was performing better than the district centre.
- 6.44 A better definition of function and role is required to manage the impact on centres. The policy approach will seek to define retail warehouse areas and specify appropriate uses reflecting the current and emerging trends.

Policy RTC12: Retail Parks

Retail proposals will be permitted in defined retail parks (Strood Retail Park, Horsted Park, Gillingham Retail Park) appropriate to their character where the following criteria are satisfied:

- Provision of suitable access, parking or parking arrangements;
- It is demonstrated that no locations in-centres are available where uses are typical of and more appropriate for a town centre location;
- It is demonstrated satisfaction of an impact assessment that there will be no impact on centres, with particular attention to vitality, viability, vibrancy and sustainability of the existing centres and their vulnerabilities
- No significant impact on the transport network and parking in the surrounding area
- Good public realm and linkage to the neighbouring centre is provided assisting in linked trips and increasing dwell time in the neighbouring centre.

An impact and sequential assessment for non-minor retail (above 2,500sqm) will be required to take account of the cumulative impact of recent significant proposals.

Where appropriate the council will require:

- conditions or legal agreements will be required to manage impact on centres, including a condition on the type and range of goods.
- Public realm works to facilitate better linkage with the centre.

Question RTC29:

Do you consider that this is a effective approach to planning for retail parks?

Would you suggest alternative policies for planning of development in retail parks?