

# **Main Town Centre Uses Topic Paper**

## **Submission Document**

Medway Council

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# 1 Introduction

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## 1.1 Definition and purpose

- 1.1.1 Topic papers set out written material produced by the local planning authority to be submitted with a local plan for examination.
- 1.1.2 The purpose of this Topic Paper is to set out Medway Council's position on main town centre uses with reference to:
  - retail need;
  - leisure need;
  - employment land need

## 1.2 Background

- 1.2.1 The commercial development needs (retail, leisure, and employment) studies were published in June 2025, i.e. the Retail and Town Centres Study and the Employment Land Needs Assessment.
- 1.2.2 The identified retail and leisure needs draws upon evidence from 2018 up to 2025.
- 1.2.3 The employment needs assessment presents a quantum and assessment of employment designations.
- 1.2.4 Few comments were received on the Regulation 19 Draft Plan regarding the quantum of retail, leisure, and employment floorspace.
- 1.2.5 There were also limited comments in response to policies S15 (Town centres strategy), S16 (Hierarchy of centres) and T15 (Sequential assessment). The comments were equally balanced in objections and support, reflecting different stakeholders.

## 2 Development Need

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### 2.1 National guidance

- 2.1.1 The National Planning Policy Framework requires the allocation of a range of suitable sites in town centres to meet the scale and type of development likely to be needed. It goes on to state that limited site availability should not compromise meeting anticipated need.

### 2.2 Retail need

- 2.2.1 For retail land uses, the evidence base assessments undertaken in 2016, 2018 and 2021 considered a range of factors relating to the need for new retail floorspace. These factors included a district-wide assessment of quantitative need (2016 Study), along with qualitative and spatial indicators in the 2018 and 2021 studies.
- 2.2.2 Based upon this collective body of research and analysis, the 2025 Regulation 19 draft Local Plan proposed a retail and town centre strategy which seeks to concentrate retail development projects within the six main 'town centres' (guided by policies S15 & S17-S21) along with planned new centres (guided by Policy S16, S22 and S23).
- 2.2.3 In relation to retail development opportunities in the main town centres, the draft Local Plan document makes specific reference to the recent masterplan studies and the Chatham Design Code, which form part of the evidence base for the new Plan. In addition, it is to be noted that the Regulation 19 consultation did not propose to allocate sites outside of the existing defined 'town centre' network, except for allocations for new centres to serve new/growing communities in strategic growth locations.
- 2.2.4 In order to provide further evidence in relation to this proposed approach, and build upon the work undertaken in 2016, 2018 and 2021, the most recent Retail and Town Centres Study 2025 has gathered additional evidence base information in relation to macro-economic and retail expenditure trends, along with trends and evidence at the local level.
- 2.2.5 The Retail and Town Centre study 2025 noted significant shifts in national trends since the 2016 study, which demonstrate a reducing demand for retail space. The retail advice indicates that future trends will do the same. Additionally, the demand for retail floorspace in Medway's centres is reducing. The more flexible approach to use classes, makes it easier for town centres to respond to on-going changes in demand levels.
- 2.2.6 Overall, therefore, it is reasonable for the new Local Plan policy not to be significantly influenced by the quantitative need forecasts in the 2016 Study and to be based, instead, on more recent indicators such as expenditure, trends and floorspace efficiency forecasts. The Council's approach reflects the great uncertainty that structural change in retail has brought throughout the country, particularly since the Covid pandemic in 2020/21. Medway shares many of the challenges of increased vacancy rates in High Streets, the reduction and closure of many high profile multiples retailers. The

Council has drawn on its quantitative and qualitative evidence base, and recent and current masterplanning and regeneration programmes to set out an effective strategy for Medway's key centres, recognising that the high levels of retail floorspace identified in the 2010s do not reflect the current or anticipated market.

2.2.7 Medway Council's positive approach for district and town centres, whilst acknowledging that the new Local Plan intends to plan for meeting its needs is therefore a combination of:

- a. *New / replacement floorspace will naturally be encouraged by the Council's positive planning strategy for existing 'town centres.'* Even without specific site / area allocations, the new Local Plan can provide for a positive policy environment to provide new retail land uses within defined 'town centres.' In addition to the opportunities already afforded to 'town centres' through the framework provided by Class E (and other permitted development rights), the content of the Retail and Town Centres Study has shown that vacant floorspace is available to accommodate a retail need. This approach is supported by the contents of the masterplans for Chatham, Gillingham, and Strood, and the Council's economic development, culture and regeneration programmes that promote resilient and attractive town centres across Medway. By reducing vacancy levels and attracting investment, our centres will be strengthened.
- b. *Planned new 'town centres' will be providing new retail floorspace to meet identified 'needs.'* A key element of providing for retail needs, alongside other main town centre land uses, is via planned new centres. These planned new centres are likely to be the focus for net additional retail floorspace allocations, particularly in relation to the provision of new convenience goods floorspace. These reflect strategic growth locations, particularly in rural and suburban areas, where new centres are essential in delivering accessible local services and contributing to place making and community life.
- c. *New retail provision will also be provided through the development management process.* It will remain the case that proposals for new retail floorspace / retail uses will come forward outside of the plan-led system and, instead, be dealt with via the development management process. This should be allowed for in the new Local Plan strategy. Whilst such proposals will face detailed scrutiny with reference to the Local Plan's retail and wider policies, they will, if permitted, go some way to meeting the needs of the retail sector and the local community, and reflect market conditions over the plan period.

## 2.3 Leisure Need

2.3.1 In a comparable way, the leisure development need was assessed and quantified in a sequence of studies, which built upon one another up to 2025. The Regulation 19 Draft Local Plan identifies locations for leisure provision through its centres S15 & S17 – S21 and using the Sequential (Policy T15) and Impact Assessments (T17) as well as identifying specific locations that

could accommodate leisure uses through policies DM13, DM14, S22, S23, T19 (meanwhile uses) and S14. This approach links to the vision and objectives of the plan to strengthen the role of Medway's centres, to support the local economy and community wellbeing. It reflects the role of leisure in defining destinations, particularly where trends for retail floorspace are declining. Complementary land uses, such as leisure, can attract people to centres.

- 2.3.2 The plan therefore does not allocate specific sites for leisure provision outside of these identified locations but does allow for other proposals to be considered through the development management process where further details can be assessed.

## **2.4 Employment Need**

- 2.4.1 The Employment Land Needs Assessment, 2025 indicates a need for approximately 240,000sqm of office/industrial and warehousing floorspace up to 2041. This equates to approximately 52.8ha of employment land. The demand is for 51ha to accommodate 204,000sq m of net additional industrial stock, and 36,500sq m of future office need that in land terms would need 1.8 ha. The assessment also provided technical advice on the strategic approach to employment land in the new Local Plan, reflecting the distinctive locational offers across Medway and current and anticipated demand.
- 2.4.2 The Local Plan sets out a strategy in Policy S10 to meet future employment land needs, through a combination of safeguarding appropriate existing sites and providing for allocations for new sites. This seeks to deliver on the vision and objectives of the plan. The plan policies recognise changes in national policy, such as changes to use class order with the introduction of the E use class, and greater flexibilities for change of use. The strategy allocates new employment sites in line with the spatial strategy, and identifies redevelopment and investment opportunities within regeneration areas and promotes rural employment opportunities in sustainable locations.
- 2.4.3 The Local Plan strategy directs office use towards the main town centres, which supports policy S15 (town centres strategy), S17 (Chatham Town Centre), S20 (Strood District Centre).
- 2.4.4 A specific policy (S11) sets out an approach to prevent the loss of valuable employment land within the context where the E class offers an increasing amount of flexibility between uses.
- 2.4.5 Industrial and warehousing uses would be located on the periphery of Medway close to the existing strategic road network.
- 2.4.6 Policy S12 identifies new employment opportunities in Hoo, and at strategic sites at Kingsnorth and Grain that would make best use of port facilities and provide unique offers in progressing new energy schemes.
- 2.4.7 Employment opportunities in the rural area which support the sustainability of villages are encouraged by policy T13 and T14.
- 2.4.8 The approach set out in Medway's Local Plan is positively prepared to meet the needs for employment land, and also provides for flexibility over the plan period to respond to changes in the economy and the needs of businesses.

The approach reflects Medway's strengths and potential to make efficient use of land and identifies appropriate beneficial locations for the type of employment uses. In directing office growth to town centre locations, the strategy supports sustainable development and strengthening the role of Medway's main town centres.

## 3 Conclusions

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- 3.1.1 Since the initial studies in 2016 there has been delivery of floorspace (Retail, leisure, and employment) in main town centres, as set out in the annual Authority Monitoring Reports.
- 3.1.2 The strategy for retail and leisure provision is to direct growth to Medway's existing centres first. The plan identifies new areas of planned growth for provision of floorspace in strategic development proposals, and allows for proposals to come through the development management process where consistent with the town centre strategy and policies including the sequential and impact assessment mechanisms.
- 3.1.3 The employment strategy identifies ways in which to minimise loss of employment floorspace through the E class and identifies appropriate locations for growth. This approach provides flexibility for changing needs and economic trends over the plan period.