

Matter 8 – Retail, Town Centres and Leisure

Issue

Whether the Plan and its policies relating to retail, town centres and leisure are clear, positively prepared, justified, effective and consistent with national policy.

Questions

Policy S15: Town Centres Strategy

8.4 Does the Medway Retail and Town Centres study (B13) cover Hoo?

We note the intention of policy S15 with regard to creating new centres in strategic locations as a means of supporting sustainable growth and travel patterns.

However, as set out in our response to Matter 2, we believe that development on the Hoo Peninsula will not be sustainable.

The comments we made on policy S15 haven't been captured in the Council's consultation statement A10.2 (ID4611 CPRE Kent).

Our key concern relates to the potential unintended consequences of new local/rural centres in relation to the impact they will have on existing facilities and whether these developments will be truly sustainably located in terms of being accessible on foot/bike or bus.

The Council's Strategic Transport Assessment, Mode Share Strategy (B18.3) states that there will only be a 10% reduction in modal share of all trips by car (from 70% to 60%) for development on the Hoo Peninsula (as a consequence cycling/LCWIP and Bus Rapid Transit initiatives) (Tables 2 and 3).

The Bus Rapid Transit, which is marked as critical infrastructure in the Council's Infrastructure Delivery Plan (B2), has yet to be confirmed in terms of the delivery body, cost and funding source.

While we support the principle of the provision of appropriate facilities to serve new development, for the reasons cited in Matters 1 and 2 we consider the Council's spatial strategy to be flawed and therefore this policy will need to be amended.

Policy S16: Hierarchy of Centres

8.12 How has the Medway Retail and Town Centres study (B13) been used to inform the hierarchy?

As drafted, policy S16 appears to place centres that have not yet been built into the hierarchy of centres.

We query how a future local centre can also be considered a rural centre. Once greenfields are built on (at the scale proposed) they are no longer rural. Unless, of course, this is recognition of the fact that the proposed strategic allocations are being unsustainably located.

The notion that the primary offer at local centres on strategic allocations would be community shopping and sustainably accessed local top up shopping appears to understate what is actually intended.

For example, the Deangate Retail Park on the A228 is set at the outer edge of the Hoo and Chattenden developments which for many residents may be too remote a location. It is noted that policy SA8(9) – “principally providing for a 25,000 sqf GIA supermarket to cater for the Hoo Peninsula, with other retail and ancillary food and drink” - refers to the provision of a new pedestrian crossing over the A228 (a 4-lane dual carriageway). We query whether this is also a cycle accessible route too.

Furthermore, this policy not only identifies Deangate as a retail park, but also identifies land east of Hoo as a main centre, with a further network of small centres within defined neighbourhoods. None of these categories appear to sit satisfactorily within the specified hierarchy of principal, district or local/rural.

We note that for the avoidance of doubt the Medway Retail and Town Centres study (B13) recommended that a clear list of all local and rural centres be included in the lower tier of the hierarchy.

Policy S22: Hoo Peninsula

8.54 Why is the creation of a total of three new centres on the Hoo Peninsula justified under Policy S22?

8.55 Why is the preferred location for the main neighbourhood centre to the east of Hoo, under Policy S22?

8.56 When this part of Policy S22 refers to this centre being located in an ‘attractive location’ what does this mean?

Policy S22 sets out that new growth on the Hoo Peninsula would require supporting infrastructure and that current deficiencies provide an opportunity to make provision for existing residents.

We support the principle of the provision of appropriate facilities to serve new development and addressing the needs of existing residents is welcomed. However, this policy should not be seen as a green light for accepting a development strategy which in its own right, is unsustainable (in terms of identifying the Hoo Peninsula as an area of significant growth for housing).

The three centres identified would be in addition to the Deansgate Retail Park SA8(9) and the existing village centre.

The categorisation/status of each centre does not follow the hierarchy set out in policy S16, which is confusing.

As set out above and in our response to Matter 2, The Council's Strategic Transport Assessment, Mode Share Strategy (B18.3) states that there will only be a 10% reduction in modal share of all trips by car (from 70% to 60%) for development on the Hoo Peninsula (as a consequence cycling/LCWIP and Bus Rapid Transit initiatives) (Tables 2 and 3), indicating that there will be little to no modal shift.

In addition, the Bus Rapid Transit, which is marked as critical infrastructure in the Council's Infrastructure Delivery Plan (B2), has yet to be confirmed in terms of the delivery body, cost and funding source.

It is not clear how the main centre location will encourage investment for main town centre uses, when presumably such uses have not been attractive as an investment opportunity in terms of the retail needs of existing residents. If Hoo has a poor investment record, this begs the question as to whether additional residential development will bring with it the anticipated infrastructure, or whether in fact the environmental value of the area will be trashed at the expense of an unsustainable development.