

Hearing Statement

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

- 8.1 Is taking a sequential approach to community uses, tourism and creative uses in particular (fourth bullet point of the policy) consistent with national planning policy?
 - 8.1.1 The inclusion of these land uses with reference to town centres and the sequential test is partially compliant with national policy. References to tourism and creative uses are compliant with the definition of ‘main town centre uses’ in the NPPF Glossary, although the reference to creative uses should be amended to read ‘arts and cultural uses’.
 - 8.1.2 In order to ensure strict compliance with the definition of ‘main town centre uses’ for the purposes of applying the sequential test, references to ‘community’ uses should be removed from this bullet point. However, it remains the Council’s view that ‘community uses’ are entirely suitable uses for defined ‘town centres’ in Medway, an aspiration which is already covered by the fifth bullet point in S15.
 - 8.1.3 Therefore, the Council supports an amendment to the fourth bullet point of S15 to read: *“the potential to deliver service, tourism, arts and cultural uses, leisure and food and beverage uses in town centres must be explored thoroughly as sequentially preferable locations”*.
 - 8.1.4 The full list of uses to be subject to the sequential test can be found in Policy T15.
- 8.2 What does in-centre and edge of centre locations will be explored for further provision of employment uses (sixth bullet point of the policy) mean?
 - 8.2.1 This refers to the Council’s support for locating appropriate employment uses in or near centres. The Council accepts that the current wording is unclear and could be clarified through a minor modification to the wording, which could read: *provision of employment uses in-centre and edge of centre locations*.

8.3 How has the Medway Retail and Town Centres study (B13) (paragraph 8.2.7) been utilised to specifically inform the strategy and the policy criteria?

8.3.1 The Retail and Town Centres Study (B13) has been used in a number of ways (alongside other evidence base documents) to inform the contents of Policy S15. In particular, it provides:

8.3.1.1 A detailed evidence base for the main town and district centres in Medway, including their retail, service and leisure land use function, plus their changing land use mix over the past several years (see Section 4 of the Study). This is reflected in the first paragraph of Policy S15.

8.3.3.2 An assessment of the qualitative and spatial need to identify new centres to support sustainable growth across Medway (see Section 5 of the Study). This is reflected in the third bullet point of Policy S15.

8.3.1.3 Advice on the content of policies which are used to guide and manage proposals for main town centre land uses (see Section 5 of the Study). This is reflected in the fourth bullet point of Policy S15.

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

8.4.1 Yes, please refer to paragraphs 5.49 to 5.55, which discuss the approach to the provision of new retail and main town centre uses to support new residential development across Hoo. This includes advice on the scale of grocery retail provision with the Hoo area and also an assessment of the appropriate locations for new retail/town centre land use provision (at paragraph 5.54).

8.5 Have other options to the town centre strategies been considered, including the provision of a greater amount of housing (and less retail potentially)?

8.5.1 Yes, the Sustainability Appraisal (ref: A3.2) considered Reasonable alternatives for growth options (see Chapter 5). The Regulation 18 Consultation in 2024 (ref: C2.1) included a spatial growth option with an urban regeneration focus. This would have supported increased housing at density in urban centres.

8.5.2 In reviewing evidence to support the town centre strategies, the Council noted earlier work on masterplans and development briefs for the centres, notably Chatham, recommended significantly higher levels of retail floorspace. Given recent trends and updated evidence (ref: B.13), this was not an appropriate option to follow in the town centres strategy.

Policy S16: Hierarchy of Centres

8.6 Why is Hempstead Valley defined as a District Centre in the hierarchy under Policy S16 (1.b) as it seems to have a significantly different character compared to the rest of the centres?

- 8.6.1 Hempstead Valley is a long-standing part of the formal ‘town centre’ hierarchy in Medway and is identified as a district centre in the adopted 2003 Local Plan.
- 8.6.2 Whilst it is materially different in relation to appearance and layout to the other town and district centres in Medway, Hempstead Valley provides an important retail, leisure and service function for the local community in a part of Medway that does not have a ‘traditional’ town or district centre.
- 8.6.3 The importance of Hempstead Valley is confirmed by both the Retail and Town Centres Study (ref: B13) and previous evidence base documents such as Parts 1 and 2 of the Retail and Commercial Leisure Assessment (November 2016 & March 2018).^{1,2} These documents show that:
- 8.6.3.1 As set out in Section 4 of the Retail and Town Centres Study (B13) the district centre has a large number of retail and service uses, providing a diversified offer for the local community, including grocery and non-food retail, retail, leisure and financial/business services. Over time, the land use profile of the centre has diversified (see Table 4.5 on page 28 of B13).
- 8.6.3.2 Evidence base information gathered for the Retail and Commercial Leisure Assessment Part 2³ provides confirmation (in Section 3 of that document) over the wide range of needs which are met by Hempstead Valley, along the use of the centre for multiple reasons.
- 8.6.3.3 Section 8 and Volume 2 of the Retail and Commercial Leisure Assessment Part 1 document also explain the importance of Hempstead Valley to local residents in terms of grocery and non-food shopping.
- 8.6.4 As a consequence, whilst it is a non-traditional in character, Hempstead Valley nevertheless provides an important destination for a range of retail, leisure and service needs of local residents. Indeed, given the range of commercial premises available in the centre, which are suitable for a wide range of uses, it is clearly differentiated from a traditional out-of-centre retail park. Moreover, due to its form and function, Hempstead Valley is not only an important centre for the existing population in the southern part of Medway, but it also offers a centre which is able to serve some of the needs of new and growing communities in this part of the District.
- 8.7 Does the size of Rainham’s centre warrant its specific inclusion in the hierarchy under Policy S16?

¹ GVA (2016) North Kent SHENA: Retail & Commercial Leisure Assessment. Available at: https://www.medway.gov.uk/downloads/file/3430/north_kent_shena_retail_and_commercial_leisure_assessment_part_1 [Last accessed 27 August 2026]

² GVA (2018) Retail and Commercial Leisure Assessment - Part 2. Available at: https://www.medway.gov.uk/downloads/file/2613/medway_retail_and_commercial_leisure_assessment_-_part_2 [Last accessed 27 August 2026]

³ Ibid

- 8.7.1 Yes, the amount of commercial premises and scale of floorspace, as set out in Tables 4.7 and 4.8 of the Retail and Town Centres Study (ref: B13) clearly support Rainham being identified as a district centre in the overall ‘town centre’ hierarchy. Indeed, whilst Rainham is the second smallest district centre in terms of the number of units and the smallest district centre in relation to retail and service land use floorspace, the centre accommodates circa 220,000sq ft (gross) of floorspace and 130 commercial units. This scale of provision is considerably larger than the local, neighbourhood and rural centres in Medway identified in the Local, Rural, Neighbourhood Centres and Shopping Parades Retail Topic Paper (July 2024) (C2.15).
- 8.7.2 Moreover, it is important to note that scale is not the only determinant of how a centre should be classified in the ‘town centre’ hierarchy. Other factors are also important, including the diversity of land uses which are present in the centre, its function for the local community plus its overall accessibility and sustainability characteristics. These characteristics for Rainham are covered in Section 4 of the Retail and Town Centres Study (B13) (including the diversity of land uses shown in Tables 4.7 and 4.8 on page 29) and Section 3 of the Retail and Commercial Leisure Assessment Part 2⁴ which provide evidence regarding how the local population interact with the centre.
- 8.8 Why are Medway Valley Leisure Park and Dockside not included in the hierarchy under Policy S16 as they are the subject of Policies DM13 and DM14, respectively?
- 8.8.1 The identification of Medway Valley and Dockside in DM13 & DM14 is in recognition of their role as leisure and retail destinations in Medway District. However, identification of their roles should not be seen as acknowledging that they have the characteristics of a defined ‘town centre’.
- 8.8.2 Both of these locations do not possess a wide enough range of land uses to allow them to function as a ‘town centre’ as defined by the NPPF. Medway Valley Leisure Park concentrates on leisure uses including ten pin bowling, bingo, cinema, gymnasium and food/beverage uses. The Dockside area also possesses a large amount of leisure uses, along with a large amount of predominantly non-food retail floorspace.
- 8.8.3 Therefore, given their scale and influence over leisure and non-food shopping patterns in the Medway area it is considered appropriate for the Plan to identify these two areas and to provide a framework for the assessment of future development proposals in these areas. The policy approach in DM13 & DM14 is considered effective as it clarifies the relationship of these areas to the defined

⁴ Ibid

‘town centre’ hierarchy and the expectations of the Council in relation to the application of the sequential and impact policy tests.

8.9 Have alternative approaches to this hierarchy been considered and so is it justified as an appropriate strategy under Policy S16?

8.9.1 Evidence base work, masterplans and development briefs prepared over the last 20 years since the adoption of the Medway Local Plan 2003, have consistently identified Chatham as the principal centre for Medway. This position is supported in wider plans and strategies, such as the Chatham Design Code (ref: B14) and the Council’s Regeneration Strategy, [Medway 2035](#).

8.9.2 Medway’s geography reflects a marked polycentric pattern of centres, supporting separate urban areas that have been connected over time through development. The District Centres and Local and Rural centres referenced in the Policy are appropriate for Medway’s sustainable development. The evidence base Study (B13) assessed the main centres and confirmed that they should be designated as main and district centres in the hierarchy. The assessment of Local, Rural and Neighbourhood Centres (C2.15) considered whether centres should be included as part of the hierarchy. The Main Town Centre Uses Topic Paper (B22.8) also explores the Council’s considerations in identifying its preferred approach.

8.9.3 The Retail and Commercial Leisure Assessment, Part 2, 2018 in Chapter 4⁵ considered the retail hierarchy in the context of the current Development Plan and proposed growth options in the Regulation 18 consultation in the preparation of the Plan.

8.10 Is it intended that criterion 3. under Policy S16 concerning new centres would apply to where new centres will be required under criterion 2. for the identified areas of strategic growth?

8.10.1 Yes. Whilst the provision of new centres is identified by S16 and other policies in the Plan, the Plan does not seek to provide an overly rigid approach to the scale, location, role and content of these new centres (in order to allow them to be designed in conjunction with the wider communities that they are intended to serve.

8.10.2 As a consequence, it is entirely appropriate and effective for criterion No.3 of S16 to require an assessment of the proposed detailed content of proposed new centres as and when planning applications are brought forward. This provides for an effective approach and ensures that new centres provide a harmonious relationship with other parts of the existing ‘town centre’ hierarchy across

⁵ GVA (2018) Retail and Commercial Leisure Assessment - Part 2. Available at: https://www.medway.gov.uk/downloads/file/2613/medway_retail_and_commercial_leisure_assessment_-_part_2 [Last accessed 27 August 2026]

Medway and do not become disproportionate in terms of their scale and function.

8.11 If so, would this provide an effective way of planning for the identified areas of strategic growth, as criterion 3. seems also to require justification for such centres?

8.11.1 The justification required would be to inform the appropriate scale of new centres, in order that they are in-keeping with the 'town centre' hierarchy and avoid adverse impacts on existing defined centres.

8.11.2 Whilst the Council considers that the overall thrust of criterion No.3 is sound, it is accepted that an amendment to the last sentence would aide clarity and increase effectiveness. Therefore, it is recommended that the final sentence is amended to: *"Proposals will need to be supported by a robust justification for the scale and type of land uses in the proposed new centre, taking into account the scale of existing main town centre land use provision, demographics and character of the surrounding area, along with the likely impact of the proposal on existing defined centres"*.

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

8.12.1 The Retail and Town Centres study (B13) provided a critical review of some retail and town centre policies in the Regulation 18 version of the draft Local Plan (ref: C2.1), along with the provision of additional evidence base information. This included:

8.12.1.1 Provision of up-to-date information on the land use profile of the main town and district centres in Medway, including the number of commercial units (by retail/service use) present in each location (along with the equivalent occupied floorspace).

8.12.1.2 A review of the retail hierarchy in paragraphs 5.5 to 5.8 of the study, including the definition of the various tiers in the hierarchy.

8.12.1.3 The approach to identifying new centres is contained within Section 5 of the study, including the specific locations for identified new centres (see paragraphs 5.17 to 5.56). This is reflected in the second numbered paragraph of the Policy S16.

8.12.2 The evidence at B13 has informed the hierarchy in Policy S16, with Chatham identified as the principal centre, Strood, Rochester, Gillingham, Rainham and Hempstead Valley as district centres and a wider network of smaller centres.

Policy T15: Sequential Assessment

8.13 Is applying an appropriate location-based approach within the hierarchy of centres (third paragraph of the policy) consistent with the sequential test as set out in national policy?

8.13.1 The intention of the third paragraph of the policy was to reflect a number of aspects of the NPPF and PPG in terms of the need for flexibility (in scale and format), the relevance of locational requirements for some proposals, along with opportunities to be flexible over car parking provision in certain central locations. However, upon reflection, the second sentence in the third paragraph of T15 may not as clear as it could be regarding the locational requirements.

8.13.2 Therefore, it is proposed to replace the second sentence in the third paragraph with: *“Consideration will also be given to the locational requirements depending upon the nature and scale of main town centre land use proposals”*.

8.14 Is preferring sites that are accessible and well connected to town centres, including for out of centre sites (fifth paragraph of the policy), consistent with the sequential test as set out in national policy?

8.14.1 Yes. This is consistent with the content of paragraph 92 of the 2024 version of the NPPF and also Policy TC3(2) of the new (August 2026) NPPF.

8.14.2 The main purpose of this text is to ensure that when there is more than one edge or out of centre location being considered under the sequential test, consideration is given to whether one location can be preferred (over the others) on the basis that it has materially better links (in terms of connectivity and accessibility). This requirement does not mandate that there must always be a ‘winner’ in such an assessment, as it may be found that competing edge or out of centre sites are sequentially equal. However, it is a well-established requirement of national policy to ensure that the best possible locations are chosen for main town centre uses. This approach has been endorsed by the judgement of Turner J. in *Borough of Telford & Wreken / St Modwen Developments v Secretary of State for Communities and Local Government* (CO/9668/2012).

8.15 Would smaller scale development be the subject of Policy T15?

8.15.1 Yes, all proposals for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan will be subject to T15. The only exceptions will be proposals for small scale rural offices or small-scale rural development (as outlined in paragraph 93 of the 2024 NPPF and Policy TC3(3) of the new NPPF.

8.16 In what circumstances would ancillary development be the subject of Policy T15?

8.16.1 Please refer to our response to Question 8.23. The Council does not anticipate that these circumstances would frequently arise.

Policy T16: Ancillary Development

8.17 How is ancillary development defined for the purposes of Policy T16?

8.17.1 The Council intends that, for the purposes of this policy, ancillary uses/development will comprise uses which have a function and direct link along with a subservient purpose to a wider separate land use. The supporting text to the policy refers to retail shops associated with a petrol filling station use, which is considered to be a useful and relevant example in the content of Policy T16 being placed with the Retail and Town Centres chapter of the Plan.

8.17.2 If further clarification is required for the Policy, the Council could provide wording reflecting the content of 8.17.1 in the supporting text at paragraph 8.5.1.

8.18 Is having a policy on ancillary development consistent with national policy on the vitality of town centres?

8.18.1 Yes. Whilst ancillary uses can take a variety of forms, some ancillary retail, leisure and main town centre related uses still have a trading/operational format which will compete with uses commonly found in 'town centres'. As a consequence, it is important, in the interests of protecting 'town centre' investment, vitality and viability that the Plan takes a two-part approach to assessing whether main town centre land use proposals are ancillary to a wider use. The first part is to assess (via criteria a-e in T16) whether specific proposals can genuinely be classified as ancillary uses in order to inform the sequential test and allow them to provide in specific locations away from defined centres. The second element is to assess whether ancillary uses would exhibit any harmful effects over town centres (hence requirement in T16 to undertake a proportionate impact assessment, in certain circumstances, in line with Policy T17).

8.19 How have the criteria for Policy T16 (a. to e.) been derived, in terms of whether they are justified and effective?

8.19.1 These criteria have been derived by the Council having regard to different types of land uses and land use functions. The formulation of these criteria has taken into account broad examples of how and why certain land uses are inextricably linked. This has included function and physical relationships and features.

8.19.2 Support for these criteria is also provided by paragraphs 5.102 & 5.103 of the Retail and Town Centres Study (B13)

Policy T17: Impact Assessment

8.20 What is the justification for the impact assessment thresholds, as they are substantially lower than those set out in national policy on the vitality of town centres?

8.20.1 The justification for the proposed impact assessment threshold can be found in paragraphs 5.58 to 5.82 of the Retail and Town Centres Study (B13). Considering guidance in the PPG (015 Reference ID: 2b-015-20190722), the following factors have been taken into account for the impact assessment threshold in Medway:

8.20.1.1 Drawing upon up-to-date evidence base data, an examination of the scale of existing retail floorspace within the main town centres in Medway.

8.20.1.2 An examination of the average unit size within the main town centres.

8.20.1.3 The cumulative impact of edge and out of centre retail and leisure proposals.

8.20.1.4 The uses which are important to the health of defined 'town centres' in Medway.

8.20.2 If an impact assessment lower than the national average is to apply, whether single or variable, thresholds for all retail and leisure development proposals should be adopted (also see answer to 8.21 below).

8.21 Was a differentiated threshold approach, based on location, considered?

8.21.1 Yes. The Regulation 18 consultation version of the Plan (ref: C2.1) proposed differentiated thresholds for different types of retail use in different locations. This approach was examined in the Retail and Town Centres study (B13) (see paragraphs 5.58 to 5.82) and found not to be an effective policy approach. As a consequence, a single impact assessment threshold was proposed for convenience and comparison retail and leisure land use proposals, and this is now reflected in Policy T17.

8.22 When Policy T17 (criterion a.) states that the scale of food and beverage proposals will be given locational consideration, what does this mean as regards the need for an impact assessment?

8.22.1 The Council accepts that the wording is unclear and that the final sentence of criterion (a) should be removed as a modification to the Plan.

8.23 In what circumstances would ancillary development be the subject of Policy T17?

8.23.1 Retail or leisure uses which are confirmed as ancillary development would be subject to the same floorspace triggers as 'standard' retail and leisure proposals under Policy T17. This would relate to the amount of floorspace which was proposed to be materially affected by the retail/leisure use (whether it be a defined area or mixed with other land uses). Given that ancillary retail or leisure uses could have materially different characteristics to 'standard' retail and

leisure uses (due to their functional links with other uses, and subordinate scale), the Council would expect a proportionate assessment which is related in scope to the nature of the proposal.

8.24 Where Policy T17 states (the paragraph under the b. criterion) that proposals may be conditioned or legal agreements established, what does this mean as managing the impact on centres?

8.24.1 The main rationale for the inclusion of this paragraph in T17 is to ensure that, where relevant, land use proposals are controlled to their originally intended use, in order to avoid adverse impacts on the ‘town centre’ hierarchy in Medway.

8.24.2 However, upon reflection, it is considered that the current wording of this paragraph is not clear and precise and therefore should be subject to amendment. It is proposed that the following replacement paragraph is inserted:

“Where appropriate, the Council may grant planning permission for retail or leisure development proposals subject to conditions or legal agreements in order to manage and control their impacts and to avoid harmful effects upon the health of, and investment within, defined town centres”.

8.25 Are public realm works, signage, linkages and demonstrating sustainable travel choices relevant to an impact assessment under Policy T17 (last but one paragraph) and therefore consistent with national policy?

8.25.1 A key objective for the Council is to protect and enhance the vitality and viability of the hierarchy of ‘town centres’ (see paragraph 8.2.1 of the draft Plan). As a consequence, it is considered important for retail and leisure proposals outside of the defined town centres to support these objectives, hence the proposed inclusion of the penultimate paragraph in T17. In some circumstances, improving linkages between proposed developments and defined ‘town centre’ will assist in mitigating impacts and ensuring that the local community continue to use and visit town centres.

8.25.2 However, the Council accepts that the wording of this paragraph could be improved and therefore suggests the following replacement paragraph:

“In order to provide suitable mitigation and to protect and enhance the vitality and viability of defined ‘town centres’ the Council may also require public realm works, signage or physical improvement works to facilitate better linkages with neighbouring centres to assist with linked trips”.

Policy S17: Chatham Town Centre

8.26 Please explain how the Primary Shopping Area, as shown on the Policies Map, has been defined for Chatham Town Centre?

8.26.1 The methodology is set out in the Regulation 18 (2024) Retail Topic Paper – Definition of Town Centre Boundaries and Primary Shopping Areas (ref: C2.14) and the conclusions are summarised at paragraph 3.2.

8.27 Please explain the relationship between the 2019 Chatham Masterplan and Chatham Design Code 2024 under Policy 17 (third paragraph, first bullet point), and how does this impact on the policy?

8.27.1 The Chatham Design Code (ref: B14) has been prepared in the context provided by the Chatham Town Centre Masterplan (ref: B15). The code provides more detailed assessment and guidance for development. However, the Masterplan has wider scope in some aspects, therefore is still a relevant consideration when bringing forward development in the centre of Chatham. As an example, Policy S17 references that proposals for ground floor residential uses along the High Street will be favoured on the eastern end of the High Street.

8.28 What does ‘updated strategic guidance’ (third paragraph, first bullet point), mean and how is this reflected in Policy S17, including if there are further updates to such documents?

8.28.1 This links back to supporting text in paragraphs 8.7.4 and 8.7.5 referring to the 2019 Chatham Masterplan and Chatham Design Code, and provides flexibility in the Policy for updated evidence, such as further masterplans and design guidance prepared over the plan period to be considered in applying the Policy. This allows for the potential for these plans to be updated again during the life of the Plan. It also allows us to refer to additional guidance as it becomes available. For instance, work is underway on a new Chatham Parking Strategy, looking at the impact of future supply and demand in parking, and through the lens of the referenced ‘Debenhams’ site, parking requirements for redevelopment in the vicinity of Chatham Town Centre. The draft strategy is expected later this year and will be used to support Policy S17.

8.29 Why are the units at the entrance of the Pentagon particularly important as signalling the core of the high street under Policy S17 (third paragraph, second bullet point)?

8.29.1 These units on the High Street coincide with significant footfall in the core retail area, and a main entrance to the Pentagon Centre, which forms an important component of the Primary Shopping Area.

8.30 What more broadly is the role of the Pentagon in the town centre, as it is referenced a number of times in Policy S17.

8.30.1 The Pentagon Centre is the major indoor centre in Chatham, and it makes a significant contribution to the Primary Shopping Area. It is a key part of the ‘Commercial Quarter’ identified in the Chatham Town Centre Masterplan (ref:

B:15). The Council has acquired the Centre and is managing and developing its use to meet community needs and consolidate Chatham's important role in the centre hierarchy. In response to changes in retail patterns (see Study – ref: B13 at paragraph 4.12), the Pentagon Centre offers opportunities for wider uses, particularly those aligned with its status in the hierarchy. These include new uses on the first floor of the centre, such as the major new James Williams Healthy Living Centre and Ascend coworking office space. These provide an indication of how the Pentagon Centre can respond positively to changing needs and support the objectives set out in Policy S17.

8.31 In terms of whether Policy S17 would be effective, why does this policy replicate provisions in Policy S15 that encourage employment uses in and on the edge of the centre (third paragraph, sixth bullet point)?

8.31.1 The Policy was seeking to reference the contribution of wider employment uses to strengthening the role of Chatham as Medway's main centre. However, the Council acknowledges that the Policy should be read in conjunction with Policy S15, and this reference in the sixth bullet point could be removed through a modification to the Plan.

8.32 Why is making the centre child-friendly (third paragraph, seventh bullet point) of particular relevance to this town centre?

8.32.1 This reference reflects the Council's corporate Child-Friendly Medway programme, which is supported by a range of wider local partners. Chatham in its role as the main role for Medway, offers key transport connections, leisure facilities, and comparison shopping is an important asset for communities, including children and young people. The Plan identifies there are opportunities to develop and strengthen the role and offer of Chatham town centre, and that an approach that meets the needs of children and young people is favoured.

8.32.2 This is referenced in the Chatham Town Centre Policy, but the Council acknowledges that this should be an expectation across all centres and could be reflected in Policy S15 or Policy T27.

8.33 In terms of whether Policy S17 would be effective, are the opportunity sites designated on the Policies Map?

8.33.1 The former Debenhams site is a proposed development allocation on the Policies Map – Site reference ID: CCB15.

8.33.2 Policy S17 designates two 'opportunity sites'. The Council considers that these two sites should be shown on the Policies Map.

8.34 Why is the Trafalgar Centre, as an opportunity site (as mentioned at paragraph 8.7.5), not included in Policy S17 itself?

- 8.34.1 The Trafalgar Centre is a consented site (MC/21/3671 and MC/24/1762) shown on the Policies Map – Site reference ID: CCB20. Reflecting its planning status, the Policy did not make specific reference.

Policy S18: Rochester District Centre

- 8.35 Why has a Primary Shopping Area not been defined for Rochester, unlike the rest of the District Centres?

- 8.35.1 A Primary Shopping Area has been defined for Rochester. This is set out on the Policies Map (Ref: A1 Urban Core).

- 8.36 How does Policy S18 reflect the rich heritage value associated with Rochester District Centre (paragraph 8.8.1)?

- 8.36.1 The Policy should be read in conjunction with Policy DM10: Conservation Areas. The designated centre is within the Rochester Conservation Area. Guidance is provided through the [Rochester Conservation Area Management Plan](#). This provides specific guidance in relation to the High Street.

- 8.37 How does the Policy S18 reflect the identified qualitative gap of a foodstore (paragraph 8.8.3), as it refers to the provision of specifically top-up convenience goods retailing?

- 8.37.1 The Policy reflects the constraints to large scale retail development in a historic setting and the proximity of the significant convenience retail offer in Strood.

Policy S19: Gillingham District Centre

- 8.38 Why has a Primary Shopping Area been defined for what is a District Centre (Gillingham)?

- 8.38.1 The Council has defined Primary Shopping Areas for the main centres in Medway, reflecting the polycentric development pattern and the important roles that these main centres in serving their communities. Gillingham provides a ‘town centre’ function in this context. The Primary Shopping Area designation shows where retail development is concentrated and is set out in the Topic Paper (ref: C2.14). This also supports the application of sequential and impact assessments.

- 8.39 How is improving vehicular movement in the centre consistent with providing sustainability accessed community facilities and services, under Policy S19 (second paragraph, fifth bullet point)?

- 8.39.1 This refers to opportunities mentioned in the supporting text at paragraph 8.9.7 to reduce traffic congestion, and therefore improving the amenity of the environment, and user experience. These could include active travel and public realm enhancements.

8.40 Does Policy S19 provide sufficient clarity over what it would expect developers to provide in the regeneration of the centre, in terms of whether the policy would be effective?

8.40.1 Yes, the Policy makes reference to a range of contributions to the centre's regeneration, including improvements to transport links, public realm, and the mix of uses. The Policy also refers to more detailed guidance in the Gillingham Town Centre Masterplan & Delivery Strategy, 2019 (ref B16), or updated guidance. This includes the Gillingham Town Centre Vision and Action Plan, 2025.

8.41 How has Policy S19 been informed by the Gillingham Masterplan 2019?

8.41.1 The Gillingham Town Centre Masterplan & Delivery Strategy, 2019 (ref B16, subsequently referred to as the Masterplan in this Question response) assessed the current condition of the High Street and surroundings, identifying constraints and opportunities. The report also included feedback on community engagement and a retail review and healthcheck. It used this analysis and information to identify opportunity areas and set out advice and recommendations. This work is reflected in Policy S19. A few examples of how the Council considered the Masterplan (ref B16) are given below.

8.41.2 The Masterplan (ref B16) at page 45 under Public Realm advises that public realm improvements could be focused on a square adjacent to Sappers Walk. This is reflected in the first bullet point under paragraph 2 in Policy S19.

8.41.3 The Masterplan (ref B16) assessed the potential links between the town centre and its wider context, particularly the Universities (see pages 28 and 29). Recommendations included improved linkages and public realm and an enhanced food and drink offer (see pages 45 and 50). These are reflected in the second paragraph of Policy S19 and the third and fourth bullet points under paragraph 2.

8.41.4 The recommendations (see page 46) include the conversion of the disused line between Chatham Waters and Gillingham station to bring people into the town centre. This is reflected in the sixth bullet point under paragraph 2 in Policy S19.

Policy S20: Strood District Centre

8.42 Why has a Primary Shopping Area been defined for what is a District Centre (Strood)?

8.42.1 The Council has defined Primary Shopping Areas for the main centres in Medway, reflecting the polycentric development pattern and the important roles that these main centres in serving their communities. Strood provides a 'town centre' function in this context. The Primary Shopping Area designation shows where

retail development is concentrated and is set out in the Topic Paper (ref: C2.14). This also supports the application of sequential and impact assessments.

8.43 Why is there a blank bullet point at the start of the bullet point list in Policy S20?

8.43.1 This is a typographical error and should be removed through a modification to the Policy.

8.44 What is meant by the light industrial offer under Policy S20 (fifth bullet point) and should the first letter of 'seeking' be capitalised?

8.44.1 This refers to the existing employment site shown on the Policies map and adjacent land to the south of the defined centre.

8.44.2 Yes, the first letter of 'seeking' should be capitalised.

8.45 In terms of whether Policy S20 would be effective, how would the transport interchange be delivered (sixth bullet point)?

8.45.1 The Council is working on the planning of the Strood Transport interchange, in collaboration with stakeholders, including Network Rail. This is ongoing work. Medway Council is engaged with Network Rail in the preparation of its draft Strood Station Travel Plan which covers topics including pedestrian, cycle, bus, taxi, and car access and wayfinding. Draft actions include measures with shared responsibility between Medway Council and Southeastern (the train operator), but it is important to note that on the rail side, the station has not been without investment, with an upgrade completed in 2017.

8.45.2 The interchange would have appropriate bus rapid transport (BRT) compatible bus stops and public realm between the station forecourt and the bus stops will be delivered through the development of a plan for Strood Riverside (LAA site reference SNF41) and as referenced in site allocation Policy SA5. A bus gate to the east of the site is already in place to help provide priority for bus services accessing the transport interchange.

8.45.3 The concept of the transport interchange is supported by regional plans including reference in Transport for the South East's Strategic Investment Plan (GT06 and BH01 – [Link](#)). The Council also anticipates developer contributions towards the transport infrastructure.

8.45.4 Development of a water-based connection is more hypothetical and not necessary for the delivery of Policy S20 but will be explored through development of the Council's River Strategy.

8.46 Also, in terms of whether Policy S20 would be effective, how would the new platforms at Strood Rail station be provided and is this supported by Network Rail (sixth bullet point)?

- 8.46.1 The concept of additional platforms at Strood Rail Station is, at most, desirable. Policy S20 does not depend on this scheme which remains a local and regional strategic aspiration at this point in time. Nevertheless, if delivered, it could inform (or “guide” as suggested in Policy S20) the development of proposals for growth in the centre.
- 8.46.2 The idea of adding platforms to access Chatham Main Line Services at Strood has been discussed for some time (first reference found associated with 2014 London Airport Surface Access Study – [Link](#)).
- 8.46.3 A pre-feasibility study was undertaken in 2023-24 (public references include reference to a completed study in 22 July 2024 Transport for the South East Partnership and Board Meeting Agenda and Papers – [Link](#)). However, beyond morphing into the wider transport interchange scheme, there is no evidence that it has been taken forward to a full feasibility study or strategic outline business case by Network Rail or any other party.
- 8.46.4 From the Council’s perspective the scheme remains an aspiration with written evidence submitted in consultation to the Railways Bill in 2026 stating “There are local aspirations to add ‘high-level’ platforms at Strood, increasing both interchange opportunities between the different lines that intersect at Strood and increasing the number of services available from the station.” ([Link](#))
- 8.46.5 Policy S20 does not depend on this aspiration because Strood Station already has a very good frequency of service, including the high-speed compatible services to London St Pancras. It already has more than the four trains per hour threshold used to define a “well-connected” railway station in the new NPPF (the definition completed by the entirety of Medway being within a ‘top-60’ Travel to Work Area - [Link](#)).
- 8.46.6 Strood Station currently has three platforms located between Strood Junction (the North Kent Line / Medway Valley Line junction) and Strood Tunnel, two of which are served by high-speed compatible and stopping services on the North Kent Line, and the third served only by Medway Valley Line trains (although Medway Valley Line services can use any platform).
- 8.46.7 Strood Station has 2-3 high-speed compatible trains per hour to London St Pancras (taking 34-36 minutes), including the peak-only service from Maidstone West, and two or three trains per hour to London Bridge and/or Charing Cross (taking over an hour). The station also offers a half-hourly stopping service to/from Maidstone West.
- 8.46.8 Rochester and other Medway Town Stations are also served by 3-4 trains per hour on the Chatham Main Line to London Victoria, providing connections to

different intermediate stations and additional stations towards Dover and Ramsgate.

8.46.9 Adding 'high-level' platforms on the Chatham Main Line at Strood Station would upgrade Strood Station to the most connected station in Medway. Benefits would include an increased frequency of service, and increased range of destinations for Strood itself, but the greatest driver regionally is increased interchange opportunities between the three lines, particularly if aspirations for Gatwick services from Strood / Maidstone are realised (TfSE Strategic Investment Plan Reference IG05 and one of the top Strategic Investment Priorities for Kent and Medway in Figure 10 - [Link](#)) .

8.47 [When would the strategic flood management infrastructure \(last bullet point\) need to be provided?](#)

8.47.1 The Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy (2019) (MEAS) does not identify specific delivery dates for all flood defence schemes. The current focus of the programme is on Sheerness, Queenborough and the Isle of Sheppey, where the Environment Agency has prioritised investment to address existing and future tidal flood risk. The Council is working closely with the Environment Agency to understand the timing of future schemes and any implications for growth areas within Medway, including Strood Waterfront. The Council has commissioned an appraisal of Medway's flood defences to aid ongoing, long-term collaboration with the Environment Agency. This work will update an assessment of flood defences conducted in 2011 and inform coordination with the MEAS and the Thames Estuary 2100 Plan (2012).

8.48 [Does Policy S20 provide sufficient clarity over what it would expect developers to provide in the centre, in terms of the effectiveness of the policy?](#)

8.48.1 Yes, the Policy makes reference to a range of contributions to the centre's regeneration, including improvements to infrastructure, such as transport and flood defences, public realm, and the mix of uses, including employment. The Policy also refers to more detailed guidance in the Strood Town Centre Masterplan 2019 (ref B17), or updated guidance.

8.49 [How is Policy S20 informed by the Strood Town Centre masterplan \(second paragraph\) and the opportunity sites that the masterplan identifies?](#)

8.49.1 The masterplan (ref: B17) provided the analysis to identify growth options in the Plan, in particular the potential for urban regeneration in the centre of Strood to contribute to housing supply and economic activity. This is reflected in the first paragraph of the Policy.

8.49.2 The masterplan also identified the objective of creating and improving civic and green spaces in Strood (ref: B17, page 26). This is consistent with the first full bullet point under the fourth paragraph.

8.49.3 Policy S20 should be read in conjunction with strategic site allocation Policy SA5: Strood Town Centre and Surrounds. This provides more detail on how the opportunity sites identified in the masterplan have been taken forward in the Plan as part of the development strategy.

8.50 [Would Policy S20 deliver residential riverside regeneration as per the Strood Waterfront Development Brief 2018 \(paragraph 8.10.8\)?](#)

8.51 Policy S20 should be read in conjunction with strategic site allocation Policy SA5: Strood Town Centre and Surrounds. This provides more detail on how development is being promoted that reflect the opportunities and principles in the Strood Waterfront Development Brief 2018. The development strategy includes sites SNF35 and SNF41 which are key areas in the Brief.

8.51 [What is the relationship between the Strood Town Centre masterplan and the Strood Waterfront Development Brief 2018, and how does this impact on Policy S20?](#)

8.51.1 The masterplan (ref: B17) considered the Strood Waterfront Development Brief 2018 in its consideration of the local policy context. The Development Brief had a more focused scope in setting out a framework for delivering development on eight sites along the river's edge. The masterplan had a wider scope, including the geographical reference area. It set out a spatial framework to guide future development and investment in the town centre and was used as evidence for the preparation of the Plan. The masterplan took proposals contained in the Strood Waterfront SPD as established context for the Strood Civic Centre site and the waterfront area close to Strood rail station and did not revisit these sites for the masterplanning exercise.

8.51.2 The Policy responds more directly to the masterplan, with its wider scope. The Development Brief has also informed Policy SA5.

Policy S21: Rainham District Centre

8.52 [Does Policy S21 reflect any specific opportunities there may be for improving the centre and related infrastructure, such as the rail station?](#)

8.52.1 The Policy reflects broad opportunities, such as improving transport links, public realm and the uses offer. This approach provides for updated evidence to inform a more specific approach. This is now emerging in the Rainham Reimagined delivery plan (August 2026).

8.53 Why has a Primary Shopping Area been defined for this District Centre (Rainham), given that it is of a modest size?

8.53.1 Please refer to our response to Question 8.7.1 which sets out the role of Rainham in the hierarchy. Consistent with this approach and the role of the main centres across Medway, the Council has defined a Primary Shopping Area.

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?

8.54.1 This approach follows the scale and location of growth proposed in the Plan, and the limited current retail provision. This is consistent with the evidence base advice in the Retail and Town Centres Study (ref: B13) – see paragraph 5.54 and spatial analysis in Appendix C. The evidence advises that given the scale of potential residential growth in the area, there is the opportunity for a network of modest sized centres to be provided. This study built on the earlier evidence provided in the Medway Retail and Commercial Leisure Assessment, Part 2, 2018.⁶

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

8.55.1 This reflects the masterplanning for strategic growth at Hoo and Chattenden, which identifies land to the east of Hoo St Werburgh as a location for a new centre that is complementary to the historic village centre. The new centre would include wider community facilities and is the proposed location for a new secondary school. This approach provides for linked trips and opportunities to establish a viable and vibrant new centre. Retail advice in guiding the location of the new centres in Hoo and Chattenden is given in the Study's (ref: B13) recommendations at paragraph 5.54 (c) 1. This approach is also consistent with Policy SA8 paragraph 10.

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

8.56.1 This reflects the evidence base advice in the Study's (ref: B13) recommendations at paragraph 5.54 (c). This refers to locations which are commercially attractive to investors.

8.57 Why would an impact assessment be required when triggered under Policy S22 (last paragraph), given that Policy S22 also confirms that a new main centre and two neighbourhood centres would be required?

⁶ GVA (2018) Retail and Commercial Leisure Assessment - Part 2. Available at: https://www.medway.gov.uk/downloads/file/2613/medway_retail_and_commercial_leisure_assessment_-_part_2 [Last accessed 27 August 2026]

8.57.1 Please refer to our answers to Questions 8.10 and 8.11 which set out our approach in relation to new centres.

8.58 Where would the new main centre and two neighbourhood centres under Policy S22 be found in Medway's hierarchy of centres?

8.58.1 The new main centre in Hoo would be a strengthened rural centre and may have the potential over time to provide a small district centre function, catering for both local residents and the wider Hoo Peninsula communities. The new smaller offers would be neighbourhood centres. These are referenced in S16 paragraph 2.

8.59 How has the Medway Retail and Town Centres Study (ref: B13) informed Policy S22, particularly the effect of the new main centre and two neighbourhood centres on the existing Hoo village centre and centres in the hierarchy?

8.59.1 The evidence to support the proposed approach to new centres in Hoo Peninsula can be found in paragraphs 5.49 to 5.55 of the Retail and Town Centres Study (B13). This section of the study considered the scale and location of new centres with regards to the location of existing retail and town centre land use provision and the likely areas of residential growth. It also provided recommendations regarding an appropriate policy framework in the Local Plan for the provision of new centres, including their location characteristics and scale/content. It was recommended that the final content of these planned new local centres is tested via impact assessments submitted in support of future planning applications (see answers to questions 8.10, 8.11 and 8.57).

8.59.2 The content of paragraphs 5.49-5.55 in B13 built upon the contents of Section 4 the 'Retail & Town Centre Planning Policy Advice' (ref: MLP/ED22), which provides an assessment of retail floorspace capacity issues in the Hoo Peninsula and also the scale and content of new main town centre land use provision. In turn, the 2021 document (ref: MLP/ED22) built upon the contents of paragraphs 4.35-4.63 of the Retail and Commercial Leisure Assessment – Part 2 document⁷, which also deal with retail / town centre land use issues across the Hoo Peninsula.

8.60 Is the formatting of the policy correct/as intended under 'The main centre;' and 'The neighbourhood centres'?

8.60.1 No. There are errors in breaks in the text and bullet points or paragraph referencing are required to correct the current presentation. A modification is proposed to address this formatting error.

⁷ GVA (2018) Retail and Commercial Leisure Assessment - Part 2. Available at: https://www.medway.gov.uk/downloads/file/2613/medway_retail_and_commercial_leisure_assessment_-_part_2 [Last accessed 27 August 2026]

Policy S23: Hempstead Valley District Centre

8.61 Why is this District Centre (Hempstead Valley) not defined on the Policies Map?

8.61.1 The Council has noted this modification to the Policies Map in our response to Question 1.18.

8.62 As this District Centre (Hempstead Valley) is not defined, is it the intention under Policy S23 to permit the enlargement of this centre, e.g. for a new foodstore (paragraph 8.13.4, noting the typo)?

8.62.1 The Policy provides for the potential for the centre to grow to meet identified local needs, particularly in relation to planned growth in this southern part of Medway, subject to the impact assessment outlined in the second paragraph of the Policy.

8.63 Does Policy S23 (and identifying it in the hierarchy) have the potential to undermine Chatham Town Centre and the other more traditional District Centres, as Policy S23 in principle supports further retail and leisure?

8.63.1 No. Whilst there is a clear justification for the inclusion of Hempstead Valley within the 'town centre' hierarchy (in Policy S16) and it is able to serve the day-to-day needs of existing and growing local communities in the southern part of the District, the Council also recognises that Hempstead Valley has a significant influence over shopping patterns in Medway. As a consequence, whilst Hempstead Valley is an in principle preferred location for retail, leisure and other main town centre land uses the Council is seeking to ensure that new development at Hempstead Valley does not lead to an imbalance in the formal centre hierarchy and damage the ability of the more traditional centres (including Chatham, Strood, Rochester and Rainham) to serve their local communities and catchments. In order to ensure this balance is maintained Policy S23 is clear that retail and leisure proposals at Hempstead Valley will only be supported after an assessment of their likely impact on other defined centres, with assessments undertaken in line with Policy T17.

8.64 If it does have the potential to undermine these centres, how is the policy justified?

8.64.1 The Council's approach to managing the potential adverse impacts on traditional centres is set out in our response to Question 8.63 above.

8.65 Why does Policy S23 not allow for other uses, such as housing or employment?

8.65.1 The evidence base (ref: B13) notes the planned growth in the vicinity of Hempstead Valley at Capstone and Lidsing. This strategic scale growth will provide an increased retail need. The Policy seeks to secure and develop its offer for local communities.

8.66 Please explain if/how the impact assessment under Policy S23 (second paragraph) would differ from the requirements under Policy T17?

8.66.1 The application of the impact assessment is outlined in our response to Question 8.63.1 above. The reference to the impact assessment requirements in Policy S23 is to provide clarity that retail and leisure proposals at Hempstead Valley will only be supported after an assessment of their likely impact on other defined centres, with assessments undertaken in line with Policy T17.

8.66.2 However the Council acknowledges that the Policy wording may not be clear, or the requirements may be duplicated unhelpfully across the two policies and a modification to this Policy may improve its effectiveness.

8.67 How would the Capstone Valley strategic allocation and the Lidsing proposal in Maidstone (paragraph 8.13.4) have implications for further retail provision in the area, in particular the Hempstead Valley District Centre?

8.67.1 Paragraph 5.34 of the Retail and Town Centres Study (ref: B13) concludes that part of the retail expenditure generated by growth within the Capstone Valley area would be captured by existing centres, including Hempstead Valley District Centre, and would therefore support their ongoing vitality and viability. The Retail and Town Centres Study (ref: B13) also recognises that the scale of sites allocated for development would create a need for new local or neighbourhood centres to meet day-to-day needs. These centres would be expected to serve the immediate needs of new communities and to complement rather than compete with the existing centres. Consequently, development at Capstone Valley, together with growth associated with the Lidsing Garden Community, would be expected to increase the population and expenditure available to Hempstead Valley District Centre, reinforcing its role within the retail hierarchy. At the same time, new local centres would be limited in scale and function, focusing on meeting day-to-day needs rather than providing the broader range of comparison and service functions offered by Hempstead Valley. On this basis, the evidence does not indicate a need for another district centre, nor does it suggest that the new local or neighbourhood centres would undermine the role of Hempstead Valley.

8.67.2 The Maidstone Local Plan Review Policy LPRSP4(B) for the Lidsing Garden Community includes an allocation for 1500 sqm of retail floorspace in a new small centre. The new local centre is considered at paragraph 6.11 in the Lidsing Garden Community SPD, 2026

8.68 How has the Medway and Retail Town Centres Study (paragraph 8.13.7, noting the typo) (ref: B13) informed the particular policy approach for this centre?

8.68.1 In light of the specific characteristics of Hempstead Valley, paragraphs 5.83 to 5.93 of the Retail and Town Centres Study (B13) provide an assessment of how

an appropriate balance can be struck between the positive role of Hempstead Valley in the hierarchy and the need to management retail, leisure and main town centre uses to ensure a balanced 'town centre' hierarchy. This has focused upon how the sequential and impact assessments should apply to future proposals in the district centre.

8.68.2 In addition, the role of Hempstead Valley is also discussed in relation to the opportunities that it provides for meeting the day-to-day needs of the growing local community in the southern part of Medway, particularly around the Capstone/Lidsing areas (see paragraphs 5.27 to 5.34 of B13).

Policy DM12: Local and Rural Centres

8.69 How will Policy DM12 be effective as regards the Hoo Peninsula, as it has its own retail and town centre policy (Policy S22)?

8.69.1 Policy S22 specifically refers in the penultimate paragraph to the new centre needing to be appropriate in scale and function in serving the new/growing communities.

8.69.2 The Council is proposing to delete Policy S22 (Hoo Peninsula) as a main modification. The Council considers that other aspects of retail, local centres and rural centres are sufficiently covered in Policy DM12 (Local and Rural Centres). Policy SA8 (Hoo St Werburgh and Chattenden) could be modified under criteria 10 and 11 to include specific reference to this aspect of Policy S22. This would include text: *"The new centre will need to be appropriate in scale and function in serving the new/growing communities, without adversely impacting upon existing centres"*.

8.70 How does Policy DM12 define walking distances, under criteria 2. and 3.?

8.70.1 Walking distances in Policy DM12 are left undefined to enable a case-by-case review of the impact of loss of community services and top-up shopping facilities. This is necessary because:

8.70.1.1 The shape, size and internal connectivity of local and rural centres differ from centre to centre. Alternative access to services or facilities, say 400m away, will differ in its ability to replace the core function depending on whether the alternative service or facility is still within the perceived boundary of the centre and the presence of appropriate walking infrastructure between the two locations.

8.70.1.2 The distance between a service or facility which may close, and an alternative facility is less relevant than the impact on the walking catchment of each facility. An alternative facility 400m away from the facility proposed for closure may add a 400m walk for the average user, or may add no walk

time at all depending on the geography of the centre's walking catchment in relation to the two locations.

8.70.2 In other words, it is the impact on walking connectivity from homes in the area which will matter most, not necessarily the distance between two facilities. While Policy DM12 does not define a walking distance, Policy T26 references an accessibility (or connectivity) standard of 15 minutes for major or strategic developments of new homes in relation to 'top-up' grocery shopping and places to socialise – both important functions of local and rural centres. Policy T26 also acknowledges the need for some flexibility in interpretation by requiring a description of how standards are met. For Policy DM12 a description of the impact on access from existing homes (and if applicable, allocated sites) would be appropriate, with reference, most likely qualitatively, to the impact on 15-minute catchments. Industry standard interpretations of a 15-minute catchment is 1.2km (at 4.8kph) – (standard applied for decades in DfT models and by Local Authorities, possibly originating in 1970's academic studies at University of Leeds - references include [Link](#), [Link](#), and [Link](#)).

8.71 Why is criterion 3 permissive to the loss of core uses, whilst criterion 2 is not as regards top-up shopping facilities, and will this impact on the effectiveness of Policy DM12? Alternatively, are top-up shopping facilities not a core use for the purposes of this policy?

8.71.1 The Council acknowledges that the wording of this Policy could be clarified. It is proposed to modify the Policy through deleting the second paragraph and amending paragraph 3 to read:

Proposals resulting in the loss of the core uses listed above will be permitted in local and rural centres where the proposals are in compliance with the Council's retail policies and it is demonstrated that one of the following a.-c. apply:

a. the loss is mitigated by the provision of a similar uses of equivalent value;

b. it is demonstrated that abundant provision exists in close proximity, is easily accessed, within walking distance and adds value to the centre;

c. 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, service or community use.

And; d. 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.

8.72 What does sustainability mean for the purposes of criterion 4 of Policy DM12?

8.72.1 The Council is proposing the following modification to criterion 4 of Policy DM12, in which 'sustainability' is replaced with 'vitality and viability' as follows: "In addition to the above, loss of any facilities in rural centres will need to demonstrate no or limited impact on the ~~sustainability~~ vitality and viability of the rural centre. Proposals will be resisted where determined to be demonstrably harmful to the ~~sustainability~~ vitality and viability of the rural centre."

8.73 Is the list (and addresses) of local and rural centres as set out in Policy DM12 up to date and correct, and accurately shown on the Policies Map?

8.73.1 Yes. Due to scale of the mapping, local and rural centres are shown by point data on the Policies Map. Detailed boundaries are provided at Appendix A to the Plan (ref: A1)

8.74 Where a review of centres has taken place (paragraph 8.14.2), how has this informed whether the policy would be justified and effective?

8.74.1 The Council carried out a review of centres. The methodology is set out in the Retail Topic Paper - Local, Rural and Neighbourhood Centres (ref: C2.15) in Chapters 2 and 3. This informed the classification of smaller centres, which are referenced in this Policy. Table 3 of the Retail Topic Paper - Local, Rural, Neighbourhood Centres and Shopping Parades (ref: C2.15) sets out the results of the Council's review of centres noted at paragraph 8.14.2.

Policy T18: Shopping Parades and Neighbourhood Centres

8.75 Why is Policy T18 a 'thematic' policy, whilst Policy DM12: Local and Rural Centres is a non-strategic development management policy?

8.75.1 The Council is proposing that the MLP's strategic and non-strategic policies are reclassified as modifications according to the Council's response to the Inspectors' initial query No. 9 and Appendix D within MLP/ED6. Policy T18 would be a non-strategic policy.

8.76 Is the list (and addresses) of the shopping parades and neighbourhood centres as set out in Policy T18 up-to-date and correct, and accurately shown on the Policies Map?

8.76.1 Yes, these are up to date, accurate and presented on the policies map with a symbol and as detailed correlating maps in Appendix A.

8.77 Why are shopping parades and neighbourhood centres local and rural centres in their infancy? (paragraph 8.15.1)

8.77 The Council accepts that the wording is unclear, and that the sentence could be deleted without changing the wider meaning of the supporting text.

8.78 If it is intended shopping parades and neighbourhood centres will all (or some will) grow, how will this be delivered through Policy T18 in terms of whether it would be effective?

8.78.1 The Policy primarily provides for the protection of these very localised small centres that often contribute to community wellbeing. Many are bounded by other uses and may have limited opportunities to expand. Proposals for growth or expansion of shopping parades and neighbourhood centres will be considered on a case-by-case basis, with reference to the Framework and the wider policies in the Plan.

8.79 How has this list of centres been derived/reviewed by officers of the Council? (paragraph 8.15.3)

8.79.1 The methodology is set out in the Regulation 18 (2024) Retail Topic Paper: Local, Rural, Neighbourhood Centres and Shopping Parades (ref: C2.15)

8.80 Should shopping parades and neighbourhood centres that are in rural areas be defined as local and rural centres instead (under Policy DM12)?

8.80.1 The shopping parades designation is not used in rural areas in the Plan. Neighbourhood Centres are used to refer to the smallest centres in villages. The Council however accepts that revisiting the terminology used in the classification has the opportunity to reflect the rural, or village, identity that is important to local residents.

Policy T19: Meanwhile Uses

8.81 How is Policy T19 for such uses justified in Medway?

8.81.1 Meanwhile uses don't just activate spaces, they create interest and affect perception positively, if done correctly. Medway's centres can benefit from such activation to increase footfall, particularly in the context of higher vacancy rates, and the opportunities to support local businesses, including the cultural sector.

8.82 Should Policy T19 refer to where such uses require planning permission, in terms of being effective?

8.82.1 Yes. The Council accepts that a modification to the Policy would improve effectiveness and a clearer reference to high streets or public squares may aid the application of the Policy.

8.83 Why is there an 'and' at the end of the fourth bullet point from the end of Policy T19?

8.83.1 The Council supports deletion of this 'and'.

Policy DM13: Medway Valley Leisure Park

8.84 Why is Policy DM13 justified as it seems to concern an out of centre location for the purposes of the hierarchy of centres?

8.84.1 The identification of Medway Valley Leisure Park ('MVLP') within DM13 is in recognition of its role in providing large-scale commercial uses in the District and that, subject to the sequential and impact tests being satisfied, it allows for the co-location of leisure facilities, focused upon the consolidation of leisure uses within a defined area.

8.84.2 DM13, working in conjunction with Policy S16, is clear that MVLP is not part of the formal 'town centre' hierarchy in Medway. Indeed, the policy is clear that MVLP will only be an acceptable location for new leisure uses once the potential to accommodate such uses within sequentially preferable locations has been exhausted.

8.84.2 Equally, the policy is clear that new leisure uses at MVLP will only be permitted where they will not have an unacceptable impact upon the health of, and investment within, defined centres in the hierarchy.

8.85 What does 'leisure designation' mean for the purposes of Policy DM13 (third paragraph)?

8.85.1 It is recognised that the term 'leisure designation' may be unclear in the context of the wider aims of the policy. Therefore, it is proposed to substitute the third paragraph with the following wording:

"Development proposals for leisure uses within the Medway Valley Leisure Park designation on the policies map be supported where they enhance or replace current provision without requiring expansion beyond the designated boundary unless they are justified by growth in the area and subject to consideration of necessary flood mitigation, compliance with policies DM18 and DM19 and the Council's retail policies:

- satisfying that no sequentially preferable sites were found in centres, edge or out of centre locations that are well connected;*
- that the impact assessment has been satisfied where triggered".*

8.86 How is Policy DM13 supporting proposals that will be compliant with the 'leisure designation' justified with a sequential and impact assessment-based approach, under the Plan?

8.86.1 Please see our response to Question 8.85 and the need for modifications to Policy DM13.

8.87 How does Policy DM13 deal differently from 'leisure' proposals in other out of centre locations?

8.87.1 The proposed modification set out in our response to Question 8.85.1 seeks to clarify the requirements of Policy DM13.

Policy DM14: Dockside

8.88 Why is Policy DM14 justified as it seems to concern an out of centre location for the purposes of the hierarchy of centres?

8.88.1 The identification of Dockside within DM14 is in recognition of its role in providing large-scale commercial leisure and retail uses in the District and that, subject to the sequential and impact tests being satisfied, it allows for the co-location of these uses.

8.88.2 DM14, working in conjunction with Policy S16, is clear that Dockside is not part of the formal 'town centre' hierarchy in Medway. Indeed, the policy is clear that Dockside will only be an acceptable location for new retail and leisure uses once the potential to accommodate such uses within sequentially preferable locations has been exhausted.

8.88.3 Equally, the policy is clear that new leisure uses at Dockside will only be permitted where they will not have an unacceptable impact upon the health of, and investment within, defined centres in the hierarchy.

8.89 How does Policy DM14 deal differently from leisure and retail proposals in other out of centre locations?

8.89.1 Policy DM14 recognises the unique scale and nature of Dockside, and the nature of potential impacts on existing centres, such as Chatham and Gillingham. However, the Council acknowledges that the Policy DM14 could be deleted and matters covered in a modification to DM13.