

Core Strategy Review - Inspectors' Action Points

**Matter 10 – Economic and Retail Growth -
Policy SS4: Priority Centres of Activity Strategy**

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Core Strategy Review Examination – Inspectors’ Action Points

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Matter 10 – Economic and Retail Growth and Strategy for Priority Centres of Activity - Policy SS4: Priority Centres of Activity Strategy

1. Introduction

- 1.1. During the hearing session for Matter 10, Economic and Retail Growth, the council undertook to review Policy SS4: Priority Centres of Activity Strategy.
- 1.2. Proposed modifications were identified to address the following:
 - Changes to the Use Classes Order (2020); and
 - Whether the second point of part b. should be redrafted to make it more permissive.
- 1.3. Proposed modifications to Policy SS4 addressing these points are set out in Appendix 1 to this note. Modifications are also proposed to Table 4.5: Priority Centres of Activity Network for consistency.

Appendix 1: Proposed Modifications to Policy SS4: Priority Centres of Activity Strategy and Table 4.5

4.4 Priority Centres of Activity Strategy

- 4.95 The following policy sets out the council’s approach to places at the heart of settlements or those central to future prosperity, such as town centres, to promote active places throughout the district.
- 4.96 Economic development and prosperous neighbourhoods are essential, not least to help overcome problems in deprived communities. The district’s assets and points of competitive advantage can attract investment and support existing business and start-up enterprises; businesses often seek convenient attractive locations in or around town centres, or to cluster with other concentrations of economic activity. These mixed-activity places can complement and bring together neighbourhoods, offering vibrancy and a range of job opportunities.
- 4.97 Locations with retail centres, shopping streets, mixed inner urban areas, business parks and industrial estates at their core are therefore identified as potential priority centres of activity.
- 4.98 Town and village centres play a critical role in anchoring the character and economy of settlements. Many centres have remained resilient to change over long periods, providing a sense of history as well as meeting economic and community needs. Although Folkestone’s town centre has shifted slightly inland over time, most of the district’s towns have retained their central focal point despite the decreasing importance of maritime activity and the growing influence of railways and roads over the form of settlements.
- 4.99 There has been general growth in a variety of business activities on the edge of towns, and perhaps less of a range of trade in central areas, with growing competition from services such as shopping on-line. Similarly industrial functions face particular competition and challenges to remain viable. These business locations require management as other land uses (sometimes commanding higher monetary returns) put pressures on their health, with the potential for them to be wholly undermined.
- 4.100 Town and local centres still retain a strong practical and symbolic significance. This is largely due to their proximity to many residents, provision of public transport, cultural and community services, public spaces and features of historic interest. These features are often particularly valued by visitors, although wider awareness of the appeal of some of the district’s market towns is perhaps limited.
- 4.101 The place-shaping and community-building roles of town and local centres are allied with the benefits of minimising dependence on the private car to access shops and services. Accordingly, their vitality and viability is supported in national policy. Clusters of industry also shape places by providing jobs in convenient locations for the workforce and practical services supporting other businesses and residents.

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- 4.102 As concentrations of activity and interest, these areas are where people meet face-to-face (by accident or arrangement). This is particularly likely in many of district’s historic centres originally built to a modest human scale, or those which have evolved on a simple layout such as a linear high street. At a different scale similar principles can apply to smaller centres within individual neighbourhoods or villages, underpinning quality of life and essential services, and these should also be recognised and supported.
- 4.103 To guide planning, investment and place-shaping, the general distribution of settlements with major employment sites and economic (retail) centres across the district is outlined below (Table 4.5).

Location and Development Purpose	Urban Area	Romney Marsh Area	North Downs Area
Major Employment Sites: <i>To protect existing and provide further premises for light industrial B2 and B8 type uses (B-class and similar sui generis uses) premises suitable to the needs of the district’s businesses and inward investors.</i>	Sites in Folkestone and Hythe	Site at New Romney, sites in Lydd	Site at Lympe, site at Hawkinge, sites within new garden settlement
Town Centres: <i>To accommodate the majority of identified needs for retail, office and leisure uses in the district through new development to improve their vitality, public realm, mix of uses, and daytime and evening economy.</i>	Folkestone (main town centre) and Hythe	New Romney	New garden settlement
District Centres: <i>To accommodate appropriate development to maintain their mix of uses and improve their vitality, viability and public realm.</i>	Cheriton	Lydd	Hawkinge
Local Centres: <i>To protect crucial services and accommodate development that maintains their viability for residents and visitors.</i>	Sandgate village, other neighbourhood parades	Dymchurch	Lyminge, Elham, Sellindge, sites within new garden settlement

Table 4.5: Priority Centres of Activity Network

- 4.104 Retail centres at the heart of Folkestone, Cheriton, Hythe and New Romney serve a large proportion of the district’s population but some shopping expenditure is lost to competing centres (especially Canterbury and Ashford). However, there are sites with potential for redevelopment within the district’s centres, particularly within Folkestone around the bus station and existing shop units on Guildhall Street, Gloucester Place and Shellons Street. Long-term scope also exists for the redevelopment of the Sainsbury’s store and adjacent areas of Bouverie Place West. The new garden settlement will help to retain local spending, while at the same time being of a scale that would not compete with the larger retail centres of Folkestone, Canterbury, Ashford and Dover and, more locally, Hythe and New Romney.
- 4.105 Cheriton and Sandgate in the Urban Area, Lydd and Dymchurch in the Romney Marsh, and Hawkinge, Lyminge, Elham and Sellindge in the North Downs all contain a range of services vital for the district’s residents, and often tourists. The degree of choice of shops and services varies, reflecting population density and accessibility, most notably in the Urban Area (the lengthy active frontages of Cheriton contrasting with much

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smaller but still locally important parades). Nevertheless these centres all offer vital local facilities for day-to-day life, such as Post Offices or healthcare, contribute to their sense of place and minimise the need to travel. These centres, and larger concentrations of services, are appropriate for development that maintains and enhances their role.

4.106 Figure 4.3 illustrates the range of locations driving the district’s economic development.

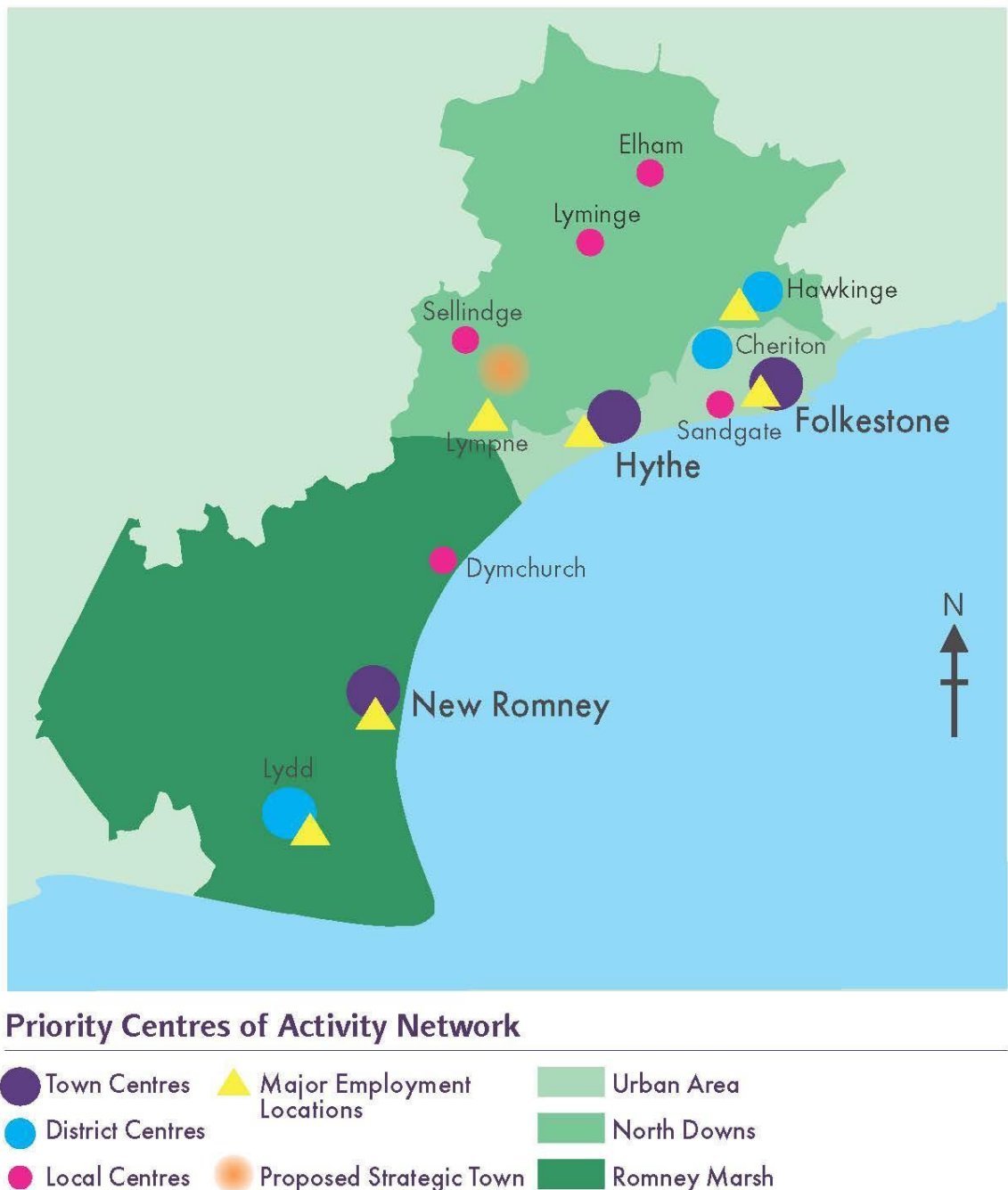


Figure 4.3 Priority Centres of Activity Network

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- 4.107 With High Speed 1 the prospects for business formation in target creative industries, financial/business services and other services are positive. Along with the provision of suitable new premises for these growth sectors, policies provide protection to resilient local industries, with the objective of building on a diverse economic base.
- 4.108 The council’s Economic Development Strategy (2015) seeks to boost the local economy and job opportunities through a number of actions, including increasing the supply and quality of employment land by identifying and bringing forward appropriate sites for commercial development, particularly around the district’s three junctions with the M20 motorway.
- 4.109 This strategy is supported by the Employment Land Review (2017) which identifies several weaknesses of the local economy, including a lack of good quality commercial space that meets modern occupier needs and an absence of strategic road access to much of the district outside Folkestone. These drawbacks have contributed to the district being highly self-contained in terms of local businesses operating in mostly local markets, with little inward investment.
- 4.110 The new garden settlement provides an opportunity to deliver a major change to the economy of the district by providing a focus for well-located strategic employment development. The Otterpool Park Garden Town Employment Opportunities Study identifies a range of potential sectors and premises that could be targeted to drive employment growth including advanced manufacturing, a business park, and an element of hybrid employment space and dispersed workspaces in local centres. These types of provision are largely absent from the current employment land portfolio and will significantly widen the market appeal of the district for inward investment from other parts of Kent and further afield.
- 4.111 However, development should not only take the form of new employment land; the Employment Land Review identified other, more qualitative, business needs. Existing industrial sites require investment with industrial and warehousing-based businesses forming a critical part of the district’s economy. New start-up business space and modern offices will also be required over the plan period.
- 4.112 Furthermore, attracting office and modern business uses – in particular to Folkestone and Hythe – is strategically significant in stimulating growth and providing additional expenditure to support local retailers. A positive approach to employment-led mixed-use development may help deliver further employment sites and economic development objectives. Similarly there is potential to enrich the appeal of the district’s larger centres by extending the hours of activity into the evening through new leisure-based enterprises.

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Policy SS4

Priority Centres of Activity Strategy

In focal points for maintaining and developing jobs and services, as represented by the Priority Centres of Activity, development will be encouraged where it complies with national policy and contributes to continued centre viability. Major commercial development, including A and B-class uses, should be located in accordance with the Priority Centres of Activity network as shown on the Policies Map and should reinforce the role of the centre. Development in Priority Centres of Activity will be allowed where it does not result in a net loss of on-site **non-retail employment B-Class** uses, and it does not jeopardise the identified commercial purpose of areas set out in the Priority Centres of Activity network (see Table 4.5).

Strategic objectives will be delivered through the following principles:

- a. A ‘town centre first’ policy will operate for applicable uses in line with national policy. Potential town centre activities or those creating significant transport demand, including retail, leisure and major office uses, should be located:
 - Sequentially, looking firstly at locations within town centres, then on the edge of centres, and only then out of centre with a preference given to accessible sites which are well connected to the town centre; and
 - With regard to their impact on the vitality and viability of, and existing, committed and planned investment in, the defined town, district and local centres.
- b. For other employment-generating (non-town centre) activities, investment should alternatively be directed to designated Major Employment Sites. If suitable sites are shown to be unavailable and unfeasible within any Priority Centre of Activity, development for employment-generating uses will **only** be acceptable where they accord with Policies SS1, SS3 and CSD3.
- c. Sustainable employment development proposals will be encouraged in appropriate locations in areas suffering longstanding deprivation where they increase employment opportunities in the area and contribute to local workforce up-skilling.
 - ~~In accordance with policies SS1, SS3 and CSD3; and~~
 - ~~Where demonstrated to be in locations suffering longstanding deprivation (and subject to directly contributing to local workforce up-skilling, sustainable transport provisions and an acceptable environmental impact on the locality).~~

To deliver commercial regeneration objectives, mixed-use development on employment land may be acceptable in line with the above principles where appropriate new **non-retail employment B-class** premises are provided **and**, the proposals provide a net gain of suitable local job opportunities, and where it can also be demonstrated that a following criterion is also satisfied (subject to the satisfaction of, unless other site specific policies) **apply**:

- At appropriate older Major Employment Sites, it directly delivers a range of small new and replacement industrial premises more appropriate to local needs; or
- In and on the edge of Town Centres, it provides a significant quantum of small incubation premises/ offices designed to meet the needs of indigenous start-up businesses.

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All development in Town and District Centres should contribute to a mix of active ground floor uses, with predominantly retail goods (A1) frontage shopping retained at the core of centres. Elsewhere in Town Centres an appropriate mix of offices (A2/B1), cultural, community and voluntary facilities, and other shop uses will be permitted; with a limited increase in the proportion of restaurants (A3) ~~where they add to the shown to be adding to the choice~~, vitality, tourist appeal and evening economy of Town Centres.

- 4.113 SS4 primarily addresses Core Strategy Review aims under the following Strategic Needs: A, C and D.
- 4.114 The above policy, and Priority Centres of Activity network, will guide plan-making and implementation, and seek to maintain a balance of uses within places and across the district, managing change in line with national policy. Detailed provisions for particular Priority Centres of Activity will be reviewed in a subsequent local plan document, with any adopted changes to the extent of designations shown on the Policies Map.
- 4.115 *Major Employment Sites*: boundaries and sites will be considered with regard to quantitative needs (SS2), national policy, and:
- Their existing or realistic future commercial quality and attractiveness as defined primarily by assessment/criteria in the Employment Land Review;
 - The need to maintain a sufficient supply of affordable premises for local industry, and to address the employment needs of deprived communities in the vicinity of the site; and
 - The desirability of access by a choice of travel modes and of promoting the reuse of previously-developed land before considering ‘greenfield’ sites.
- 4.116 *Town Centres*: Primary Shopping Frontages have been designated in Folkestone and other town centres on the Policies Map. The purpose of Primary Shopping Frontages is to prevent the loss of retail uses in main shopping streets. (Secondary Shopping Frontages have also been designated within Folkestone Town Centre to support the primary area, providing a wide range of shops, services and restaurants as well as space where more specialist and individual shops can locate to.) Folkestone Town Centre is the most sustainable and viable location for major retail, leisure and office development within the district, capable of accommodating substantial commercial growth in line with SS2 and CSD6. The Core Strategy Review will provide for the retail needs of the district by applying the Priority Centres of Activity Network and national policy.
- 4.117 *District and Local Centres*: District and Local Centres are designated on the Policies Map to safeguard the viability and the shopping and service needs of communities in smaller centres. The prospects of delivering development in Sellindge will be reviewed before confirming whether to designate it a Local Centre. Neighbourhood parades in the Urban Area will be protected in line with local evidence.
- 4.118 In town, district and local centres development should also foster a sense of vibrancy and place through a mix of public, private and voluntary facilities in accordance with SS3. These services support visitors, as well as local businesses and residents,

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complementing the tourist attractions and rural appeal of the district (policy CSD3). Modest expansion of existing business sites in sustainable locations outside the Priority Centres of Activity may accord with plan aims, but should be dealt with in accordance with national and local policy.