

Thanet District Council

Matter Statement

Matter 12 – Town and District Centres (Policies SP06 – SP10 and E04 – E06)

A large, decorative graphic at the bottom of the page consisting of several overlapping, curved bands in various shades of blue, creating a sense of movement and depth.

Q1. What criteria have been used to determine the hierarchy of centres? Does this relate to the size and existing provision within settlements?

The retail hierarchy was assessed in detail in Section 2 of the Town Centre Retail, Leisure, Tourism and Culture Assessment 2012 (CD3.1) and updated in 2016 (CD3.3) A detailed audit of each centre was presented in Appendix 3. A range of factors were taken into account including: catchment areas served by existing town centres taking account of how the centres interact with one another (derived from household and in-centre surveys), the scale and mix of facilities and rental values achieved.

Q2. Is the hierarchy of centres justified and clear to decision-makers, developers and local communities? Are the town centre boundaries illustrated on the policies maps for Westwood, Margate, Ramsgate and Broadstairs?

Section 7 of the Town Centre Retail, Leisure, Tourism and Culture Assessment 2012 (CD3.1) sets out recommendations relating to the strategy for District's centres, drawing on the detail evidence set out in the study. The Town Centre Strategy section on page 24 of the Plan sets out the retail hierarchy and its objectives, which are:

- Safeguard and sustain Westwood's role in preventing retail expenditure leaking outside the district.
- Enable the coastal towns to achieve and maintain a viable, diverse and sustainable commercial base.
- Ensure the scale of development at the District and Local Centres is sufficient to serve local catchments but not harmful to the function of the town centres.
- Allow residential development in locations that support the function of the town centres.

The extent of the town centres of Westwood, Margate, Ramsgate and Broadstairs is defined by the primary and secondary frontages together which are shown on the proposals map.

Q3. Is the Plan consistent with paragraph 23 of the Framework which, amongst other things, states that Local Plans should define the extent of town centres and primary shopping areas?

Policy E05 is clear that for the purposes of the sequential and impact tests, main town centre uses should be located within area defined as primary and secondary frontages. In policy terms this area represents the primary shopping area and extent of the town centres as referred to in paragraph 23 of the Framework. The Framework Annex 2 Glossary indicates primary shopping areas generally comprise the primary and, where contiguous, secondary frontages. The primary and secondary frontages therefore have a dual function (Policies E04 and E05)

The plan defines the extent of the town centres and primary and secondary shopping areas on the policies map. The town centre policies state that the extent of the town centre boundaries is defined by the primary and secondary frontages.

Q4. Is Westwood identified as a centre at the top of the retail hierarchy? If so, what is the justification for this?

Sections 2 and 7 of the Town Centre Retail, Leisure, Tourism and Culture Assessment 2012 (CD3.1) and Section 2 of the 2016 update (CD3.3) confirm Westwood sits at the top of the retail hierarchy in Thanet. Westwood is the largest of the town centres and commands the highest rental values. There is a presence of national multiple retailers and the catchment includes the whole of the district as well as some areas outside the district boundary.

More information on the justification for the retail hierarchy is contained within the Town Centre Retail, Leisure, Tourism and Culture Assessment 2012 CD3.1 at page 2.

Q5. Is the retail strategy (set out in paragraph 2.10 of the Plan) to retain Thanet's market share of retail expenditure in the sub region, and not increase it, the most appropriate strategy for the area? Is it justified by appropriate available evidence?

Thanet currently retains 84% of comparison shopping trade and 98% of convenience shopping within the district, as calculated from household survey results. These high market shares indicate there is limited potential to claw back expenditure leakage. Furthermore, the strategy assumes a high level of expenditure inflow (23% for comparison shopping and 12% for convenience shopping) therefore a balanced approach to in and outflows has been adopted. In the year 2000 retention of comparison shopping spend was 53.4%, which suggests the District has already achieved a significant increase following development at Westwood. Given factors such as the level of internet shopping nationally the retention figures are in the region of a best case scenario and therefore it is considered there is no need to increase Thanet's market share.

Q6. What are the figures in Table 1 based on? Are the figures for convenience and comparison goods accurate and robust? Are the figures net or gross?

Table 1 is based on the findings of the Thanet Retail and leisure Assessment 2018 Update CD3.4, Tables 2.1, 2.2 and 2.3. This report is based on the latest expenditure figures from Experian and OAN population growth, and sets out the comparison goods, convenience goods and food and beverage floorspace projections. The floorspace projections are gross floorspace up to 2031, based on constant markets shares.

Q7. What is the justification for stating that the quantitative level of retail need should be regarded as a 'guide' rather than a 'target'? Does the Plan allocate a range of suitable sites to meet the scale and type of retail needs as required by paragraph 23 of the Framework? How does the Plan ensure that the needs for retail will be met in full and will not be compromised by limited site availability?

The floorspace capacity projections are long-term (up to 2031) and are highly susceptible to change due to uncertainties relating to population and expenditure growth, home shopping, market shares and turnover densities. The Town Centre Retail, Leisure, Tourism and Culture Assessment 2012 (CD3.1) indicates the projections up to 2031 should be treated with caution, and the projections should be updated every 4-5 years. Policy SP06 states that the figures should be regarded as a guide rather than a target following queries from Development Management colleagues asking whether a development should be refused if it exceeds the retail need for a

particular area. Policy SP06 states that provision is made for these levels of need. Following the introduction of the NPPF the test of need no longer applies.

For Margate and Ramsgate capacity exists in the vacant frontages to accommodate the majority of the retail need. These town centres also contain opportunity sites which could accommodate an element retail and this would be a compatible use given their town centre locations. Other allocations in these towns such as the Margate Seafront and Harbour Arm policy and Ramsgate Waterfront and Royal Harbour also permit retail in these areas.

In Broadstairs sufficient capacity does not exist within the vacant frontages to accommodate all of the retail need and as no suitable sites exist, and in accordance with paragraph 23 of the NPPF, the Council have added wording for the consideration of out of centre sites that are well connected to Broadstairs Town Centre.

At Westwood sufficient land exists within the primary and secondary frontages to accommodate retail need within the town centre boundary over the plan period.

Q8. Does the Plan identify the need for other uses such as leisure, commercial, office, tourism, cultural, community and residential development needed in town centres? How will the need for such uses be met over the plan period, having regard to paragraph 23 of the Framework?

The Town Centre Retail, Leisure, Tourism and Culture Assessment 2012 (CD3.1 – Sections 5 and 6) looked into the need for leisure, culture and tourism uses and concluded that nothing specific was required in town centre policy. However, the plan makes provision for these uses in the secondary frontages, within the bespoke seafront areas for each of the coastal towns, opportunity sites, Margate Old Town, Dreamland, the Lido and in the flexible uses allowed for certain business parks across the District subject to the sequential test. Policies within the Tourism chapter of the plan also make provision for these uses.

The plan acknowledges that residential is an important element of the town centre mix and supports residential at first floor in the primary frontages and residential uses within the secondary frontages.

Issue 2 – Westwood - Policy SP07

Q1. What sites have been identified to meet the need for comparison retail goods at Westwood? How will the identified need be met over the plan period?

At Westwood the primary and secondary frontages cover Westwood Cross, Westwood Gateway, Westwood Retail Park, East Kent Retail Park, the Tesco site, Broadstairs Retail park and the Sainsburys site. Sufficient land exists, including scope for intensification, within this town centre boundary to accommodate retail need by way of vacancy and redevelopment and reconfiguration of car parking and stores e.g. mezzanines.

Q2. What is the justification for identifying Primary and Secondary retail frontages at Westwood? Do the frontages reflect the retail role, character and function of the centre at present?

The primary and secondary frontages at Westwood are based upon the existing retail role, character and function of the centre at present along with an appreciation of the [then] committed developments/exant permissions and their contribution to meeting the retail need at Westwood over the plan period.

Q3. What is the justification for requiring development proposals to secure the implementation of the Westwood Area SPD and Westwood Relief Scheme? What progress has been made in developing the SPD and details of the scheme? Should policy SP06 set out more detail as to the content (for example specific objectives or policies) that applications will be expected to comply with to ensure that the policy is clear and effective?

The Westwood Area SPD seeks to address the piecemeal nature of the way Westwood has grown over the years. The improvements would ensure that pedestrian access between sites is improved ensuring that Westwood becomes a cohesive town centre. The SPD also seeks to implement to Westwood Relief Strategy which ultimately looks to circumvent traffic around Westwood further achieving the aims of a cohesive town centre.

The Westwood Relief Strategy is set out in the Transport Strategy (CD6.2) section 9.4. Many of the improvements associated with the Westwood Relief Strategy have already been implemented.

In terms of development of the SPD, the work so far has involved officers from TDC planning and KCC highways scoping out the document. Three phases of implementation are envisaged:

Phase 1 – Westwood Relief Strategy/Signing

Phase 2 – Pedestrianisation/Stopping up traffic/General pedestrian improvements

Phase 3 – Remodelling the various sites following redevelopment

There has yet to be consultation with stakeholders. In terms of Policy SP07 and the interim period before the SPD is adopted the Council would not like to see further development that would jeopardise the aims of the SPD.

Q4. Is it clear to decision-makers, developers and local communities what uses will be permitted at Eurokent? Is the policy effective?

It is considered that it is clear what uses would be permitted. The “up to” figures reflect the main uses allowed in appeal decision APP/Z2260/A/14/2213265 (CD9.12 and 9.12.1)

Q5. What is the justification for allocating the site for up to 550 dwellings and 5.45 hectares of land for business uses? What is this based on and is it achievable?

The allocation reflects the appeal decision referred to above.

The site has been taken on by Homes England who have drawn up a comprehensive masterplan for the site. Phase 1 of the reserved matters for 54 houses has been approved.

It is understood that the employment elements of the development have occupiers.

Q6. What is the justification for requiring development proposals to contribute towards the Local Employment and Training Fund? Is this appropriate for all proposals? Is it clear to

decision-makers, developers and local communities what is required of proposals for new development? Is the policy justified and effective?

The Local Employment and Training Fund is designed to offset the loss of employment land associated with allowed non traditional employment uses. The Economic Growth Strategy for Thanet 2016 identified improving workforce skills as a foundational priority to delivering Thanet's job growth and therefore it was considered appropriate to collect funds for this purpose.

Q7. How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?

The mix of uses are largely based on the appeal decision referred to above.

Open Space requirements were calculated using Table 7 of the Preferred Options Plan 2015, based on the Open Space audit carried out in 2005. This has since been revised as have the Open Space standards in the local plan as discussed on Hearing Day 4.

Using the open space standards set out in Table 12, and revised number of people per household, the open space requirement should be 4.4ha

It is proposed that the policy is reworded in line with the other Strategic Site policies.

Q8. How has the effect of the proposed development on the local road network been taken into account? How will the site be accessed, and is it clear to decision-makers, developers and local communities what the necessary highway improvements consist of?

The impact of the development on the local road network has been considered as part of the Transport Strategy. Following on from Hearing Days 4 and 5 it is proposed that specific highway measures and off site contributions are referenced in the policy.

Q9. What is the justification for requiring an archaeological assessment? How has the effect of the proposed development on nearby heritage assets been considered?

As part of the SHLAA technical consultations the need for an archaeological assessment was highlighted by KCC. In this case it refers to the listed barns on east side of Haine Road towards the southern end of the allocation.

Q10. What is the justification for allocating land at Thanet Reach as part of a mixed-use development? Is the site deliverable?

Thanet Reach is an edge of town centre site and is considered suitable for mixed use development and in a desirable deliverable location. In effect this policy just cross refers the northern part of the site to Policy SP03 and and the southern part of the site to Policy H01.

It is considered that this Policy SP07(3) adds nothing to the plan and should therefore be deleted subject to Inspectors' agreement.

Q11. Is it clear to decision-makers, developers and local communities how much residential development is permitted on the site? Is the policy effective?

The residential capacity of 80 dwellings is contained in Appendix B of the plan. It may be appropriate to express this in the policy if it remains, see Q10.

The Policy is essentially a signpost to SP03 which allocates the northern section of the site for employment and HO1 which allocates the southern part of the site for residential development.

Issue 3 – Margate - Policy SP08

Q1. What is the justification for resisting the loss of existing commercial premises in Margate Old Town? Is the policy justified, effective and consistent with national planning policy?

Margate Old Town is the focal location for creative and cultural industries and this contributes significantly to the vibrancy of Margate town centre and also providing a link to the Turner Contemporary. Loss of commercial premises at ground floor in this area may damage this growing economy and would be contrary to paragraph 21 of the Framework. Some of Margate Old Town is within the flood risk area where commercial uses at ground floor would be better suited than residential uses. The area covered by the policy is relatively small and it is considered that when considered alongside the wider town centre strategy for Margate it is positive.

Q2. Is it clear to decision-makers, developers and local communities how the Council would consider whether a proposal for new development reduced the attractiveness of Dreamland or its leisure/tourism potential?

It is considered that the policy could be made clearer because the reference to “attractiveness” relates to its user not its appearance:

Dreamland will be developed as an amusement and/or theme park and will be a significant attraction supporting the regeneration of the town.

Proposals that seek to extend, upgrade or improve the attractiveness of Dreamland as an amusement and/or theme park will be permitted. Development on site that would lead to the reduction in its attractiveness as a leisure or tourist destination will be resisted, including the loss of the scenic railway.

Proposals would be required to be compatible with the context and proposals of the strategic urban design framework, and integration with appropriate proposals for redevelopment/refurbishment of neighbouring sites.

Q3. Should Policy SP08 refer to resilient design, taking account of Margate’s coastal location and the need to consider climate change and flooding? Additionally, would a reference to the need for development essential for public safety in the Margate Seafront and Harbour Arm area be justified?

The following change is recommended to paragraph 2.2 in the introduction to the town centre strategy:

*The National Planning Policy Framework states that planning policies should be positive and promote competitive **and resilient** town centre environments and set out policies for their management and growth over the plan period. Plans should recognise town centres as the heart of the community and pursue their vitality, viability, **sustainability and resilience**. A network of centres should be defined that reflects the relationship between them in order to guide future development.*

It is considered that this covers KCC's concern rather than repeating it in all of the coastal town centre policies. Other policies in the plan deal with climate change and flooding and it is considered that the plan adequately deals with resilient design.

Margate Old Town SP08(2) falls partially within the flood risk area and therefore the policy only allows residential development above ground floor in this area.

It is not considered justified to include reference to the need for development essential for public safety specifically in this policy as it would be a material consideration of any application and public safety is a consideration in the 2019 Framework.

Q4. Does the Plan adequately define the extent and purpose of the 'Opportunity Sites'? Is it clear to decision-makers, developers and local communities what is required of proposals for new development in these areas?

The Council have been deliberately flexible when defining the extent of opportunity sites so as not to be too prescriptive. The policy states that they are considered for mixed use town centre development and that the ultimate goal of redevelopment of the sites is regeneration.

Issue 4 – Ramsgate - Policy SP09

Q1. What is the justification for requiring development proposals to have regard to the emerging Ramsgate Maritime Plan? What is the current status of the Maritime Plan and is it clear to decision-makers, developers and local communities what is required of proposals for new development? Is the policy effective?

The Ramsgate Maritime Plan sets out the Council's aspirations for Ramsgate Port and Royal Harbour which are both owned by Thanet District Council. The Maritime Plan is adopted and sets out the key priorities for the Port and Harbour:

- protecting and growing the existing relationships with users of the port and harbour in order to assure service standards and secure future income streams;
- implementing the Ro-Ro strategy described in this plan to restore the commercial port's market position and recover recently lost revenue;
- making improvements at the Royal Harbour Marina (new marina management system, increasing visitor footfall and dredging) to significantly enhance the user experience and attract more visitors;
- keep the re-launched website fresh to support the commercial port and Royal Harbour Marina in order to raise substantially their market profiles.

It is considered reasonable that developments at the port should have regard to the plan and its aspirations/priorities.

In preparing the plan there has been consultation with stakeholders and separate workshops were held with participants drawn from a wide range of different interests.

Q2. Should Policy SP09 refer to resilient design, taking account of Ramsgate's coastal location and the need to consider climate change and flooding?

The following change is recommended to paragraph 2.2 in the introduction to the town centre strategy:

*The National Planning Policy Framework states that planning policies should be positive and promote competitive **and resilient** town centre environments and set out policies for their management and growth over the plan period. Plans should recognise town centres as the heart of the community and pursue their vitality, viability, **sustainability and resilience**. A network of centres should be defined that reflects the relationship between them in order to guide future development.*

It is considered that this covers KCC's concern rather than repeating it in all of the coastal town centre policies. Other policies in the plan deal with climate change and flooding and it is considered that the plan adequately deals with resilient design.

Q3. What are the reasons for not referring to heritage considerations in Policy SP09, such as the Heritage Action Zone in partnership with Historic England? Is this referred to elsewhere within the Plan?

In order to keep the town centre sections focused on topic reference to the Heritage Action Zone (HAZ) has been excluded as has the Townscape Heritage Initiative for Margate.

The Council have generally resisted referring to time limited projects in order to ensure that the Plan does not become out of date prematurely. However both the Heritage Action Zone and the Dalby Square Townscape Heritage Initiative have been referenced in the heritage section of the plan in light text preceding Policy SP34 Conservation and Enhancement of Thanet's Historic Environment.

Following a modification to Policy SP02 and its supporting text in the job growth strategy the HAZ is now cited as an example of how cultural and creative industries are being encouraged.

Issue 5 – Broadstairs - Policy SP10

Q1. What is the justification for resisting the loss of existing commercial premises along the Broadstairs Promenade and Beach Front? Is the policy justified, effective and consistent with national planning policy?

This beachfront area of Broadstairs is very important for leisure and tourism in Broadstairs and it is considerably more compact than the Margate Seafront and Harbour Arm and Ramsgate Waterfront and Royal Harbour areas affecting very few properties. Broadstairs Promenade and Beach Front also permits retail development and as such also contributes to meeting the retail need over the plan period. It is considered that the policy is positive as part of the wider strategy for the town centre.

Q2. Should Policy SP10 refer to resilient design, taking account of Broadstairs' coastal location and the need to consider climate change and flooding?

The following change is recommended to paragraph 2.2 in the introduction to the town centre strategy:

*The National Planning Policy Framework states that planning policies should be positive and promote competitive **and resilient** town centre environments and set out policies for their management and growth over the plan period. Plans should recognise town centres as the heart of the community and pursue their vitality, viability, **sustainability and resilience**. A network of centres should be defined that reflects the relationship between them in order to guide future development.*

It is considered that this covers KCC's concern rather than repeating it in all of the coastal town centre policies. Other policies in the plan deal with climate change and flooding and it is considered that the plan adequately deals with resilient design.

Issue 6- Primary and Secondary Frontages - Policy E04

Q1. What criteria have been used to determine the primary and secondary frontages? Are they justified and clear to decision-makers, developers and local communities?

The primary and secondary frontages were drawn reflecting existing commercial uses and character of the centre. Land use plans were provided in the audit of centre in Appendix 3 of the Town Centre Retail, Leisure, Tourism and Culture Assessment 2012 (CD3.1). Audits have been carried out for all subsequent years. They also took account of rental values, pedestrian flows, accessibility and vacancies consistent with the NPPF. The primary and secondary frontages are identified on the policies map.

Q2. What is the justification for the extent of the secondary frontages in the coastal town centres?

The secondary frontages were drawn reflecting existing commercial uses and the character of the area. Land use plans were provided in the audit of centre in Appendix 3 of the Town Centre Retail, Leisure, Tourism and Culture Assessment 2012 (CD3.1). Audits have been carried out for all subsequent years. The Council were particularly mindful of the need to accommodate the retail floorspace projections to the end of the Plan period.

Q3. What is the justification for allowing uses falling within Use Classes A1-A5 throughout primary frontages? Is this consistent with national planning policy?

The NPPF at paragraph 23 says that LPA's should define the extent of town centres and primary shopping areas based on a clear definition of primary and secondary frontages in designated centres and set policies that make it clear which uses will be permitted in such locations. The NPPF provides limited guidance relating to the appropriate mix of uses, and therefore local circumstances need to be considered. Primary frontages were drawn at the existing commercial heart of the town centres, where there is a high proportion of retail use. It was considered that to reinforce and consolidate the retail cores they should be restricted to the A uses. The floorspace

projections in Table 1 of the Plan indicate there is a need to maintain and enhance a mix of Class A1 – A5 uses. Other main town centre uses as defined in the NPPF, e.g. cinemas and businesses are allowed in the secondary frontages within the town centre.

Q4. What criteria will be used to determine whether a proposal within a secondary frontage would fragment or erode the frontage to a degree that compromises footfall or undermines the function of the centre? Is the policy sufficiently clear to decision-makers, developers and local communities? Is the policy effective?

An example of fragmentation or erosion to a degree that would compromise footfall or undermines a centre would be where other parts of the town centre are not visible or where the general character of the frontages is non commercial.

The NPPF provides limited guidance on how the appropriate mix of uses should be controlled. The need for more diversity, in addition to retail uses, in town centre is now widely recognised, for town centres to compete with home shopping. The suitability of other town centre uses and residential will be dependent on a wide range of factors including: nature of the proposed use, opening hours, the extent of active or dead-frontage, the specific location of the section of frontage etc. As a result, applications for non-Class A uses will need to be determined on a case by case basis. A threshold approach e.g. maximum proportion off non-retail frontage, was considered to be too inflexible.

Issue 7- Sequential and Impact Tests – Policy E05

Q1. What are the thresholds in Policy E05 based on? Are they justified by appropriate available evidence?

The PPG (paragraph 009 Ref ID: 2b-009-20140306) provides a list of six considerations of impact thresholds. These considerations relate to the scale of town centres, their vitality and viability, the vulnerability of local centres and the likely effects of development on any town centre strategy. The Town Centre Retail, Leisure, Tourism and Culture Assessment 2012 (CD3.1) suggested thresholds for the impact assessment and this is set out under “Scale of Retail Development” on page 59 of that document. This study included an analysis of the scale and role of each town centre, and the health of each centre was assessed in Appendix 3. Some centres were identified as vulnerable, particularly in terms of the high shop vacancy rate i.e. Ramsgate (over 22%) and Margate (32%).

The assessment concluded that if the NPPF threshold of 2,500sqm was adopted then a single development proposal could exceed the short to medium term floorspace projections for the district. Proposals that significantly exceed the floorspace projections for each town will reduce the turnover of existing floorspace and this impact should be tested, not least due to the high shop vacancy rate in some centres.

The assessment suggested three thresholds for all edge and out of centre retail proposals as follows:

- 1,000 sq.m gross for Westwood Cross, Margate and Ramsgate;
- 500 sq.m gross for Broadstairs, Cliftonville, Birchington and Westgate; and
- 280 sq.m gross elsewhere.

The Council decided to adopt two thresholds, one for the urban area and one for the rural area, as this was easier to apply in spatial terms, and recognising the catchments of centres in the urban area overlap to a significant extent.

The 280sqm threshold is based on Sunday Trading – in effect what is considered small scale.

Q2. Will it be clear to decision-makers, developers and local communities whether a development proposal is within the urban or rural Area?

The urban area is defined by the urban confines. The rural area comprises the open countryside and the villages. It may be appropriate to add a footnote/operational note to this effect.

Q3. Is Policy E05 consistent with paragraph 26 of the Framework in requiring impact assessments for proposals for main town centre uses?

The impact test is consistent with paragraph 26 of the Framework however, it needs to make it clear that this refers to retail, leisure and office uses “outside town centres” and this is proposed as a modification. Paragraph 26 indicates that impact assessments are required for retail, leisure and office development outside of town centres. The Annex Glossary indicates retail and leisure uses include a broad mix of uses, but arguably not arts, culture and tourism development. We note the revised NPPF now only requires impact assessment for retail and leisure uses, and not offices or other non-retail and leisure main town centre uses.

Q4. Is it necessary, effective and justified to largely repeat the requirements of paragraph 26 of the Framework within Policy E05?

The wording from paragraph 26 of the Framework is effective and justified. It is considered helpful to restate this wording in Policy E05 to set the context for the locally set thresholds.

Issue 8- District and Local Centres - Policy E06

Q1. Is Policy E06 consistent with national planning policy in requiring development proposals to meet a local need?

The aim of the policy is to ensure the scale and type of development is directed to centres at an appropriate level within the retail hierarchy, consistent with the sequential approach and strategy for each centre, whilst protecting the role of all centres (large and small). Paragraphs 2.7 and 2.8 of the Plan reflect the respective role of centres and indicate that large scale retail development is not appropriate in district and local centres.

District and local centres in Thanet are difficult to define on the proposals map because retail and main town centre uses can be fragmented and spread over a wide area. As a result, it is necessary to control the scale and nature of retail provision that would normally be permitted within these centres. Normally centre boundaries on proposals maps physically constrain large scale development.

The term local need is only meant to be descriptive of the type of shopping these centres cater for. Although the former test of need no longer applies in national policy, the term “need” could be ambiguous and it is proposed that this is deleted from the policy.

Q2. What is the justification for restricting development proposals to no more than 1,000 square metres?

This was considered the maximum size of store/development that is likely to serve the small catchments relevant to the District and Local Centres. Anything larger would serve a wider catchment area and may have an impact on other centres. The 1,000 sq.m threshold is consistent with the impact threshold for the urban area in Policy E05. Development over 1,000 sq.m would need to comply with Policy E05.