Gravesham Borough Council

Response to Issues:

ISSUE 9: GRAVESEND TOWN CENTRE OPPORTUNITY AREA – Policy CS05

Issue 9 Questions (i)-(ii)

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Gravesend Town Centre Opportunity Area – Policy CS05
Issue 9 Questions (i-ii) – Gravesham Borough Council

Issue 9 Gravesend Town Centre Opportunity Area – Policy CS05

i) Is the policy and the proposals for growth and change in this area appropriate and justified, including in relation to the NPPF, and in terms of environmental, economic and social impact, including in relation to the Heritage Quarter?

ii) Are they clear and deliverable, including in respect of the associated transport and other infrastructure requirements?

Relevant Background Documents

SCS-03 Consultation Statement May 2013 (including Errata)
SCS-05 Proposed Submission Gravesham Local Plan Core Strategy – Representations Report May 2013
SCS-08 Conformity of the Submission Gravesham Local Plan Core Strategy with the National Planning Policy Framework and the Planning Policy for Traveller Sites May 2013
SCS-14a Proposed Submission Gravesham Local Plan Core Strategy Schedule of Proposed Minor Amendments May 2013
SCS-14b Proposed Submission Gravesham Local Plan Core Strategy Document May 2013 (tracked changes version)
SCS-14c Proposed Submission Gravesham Local Plan Core Strategy Appendices May 2013 (tracked changes version)
PE-02 Implications of Revocation of the South East Plan Position Statement (May 2013)
RET-01 Retail and Commercial Leisure Background Paper (Dec 2012)
RET-02 Retail Study Update (March 2012)
RET-03 Health Check Update of Gravesend Town Centre (May 2011)
RET-04 Addendum to Gravesham LDF Retail and Commercial Leisure Study (July 2010)
RET-05 Gravesham LDF Retail and Commercial Leisure Study Final Report (Dec 2009)
JUL12-01 Gravesend Town Centre and the approach to Retail and other Main Town Centre Type Development (July 2012)
JUL12-02 Summary of representations received to Gravesham Retail Study Update and Gravesend Retail Policy Approach Update, July 2012.
REG-06 South East Plan (2009)
NAT-01 National Planning Policy Framework (2012)

Introduction

2. The policy recognises the importance of promoting the multi-functional role of the town centre, making it relevant to modern needs within the constraints imposed by a market economy, whilst taking advantage of its heritage and riverside setting as a means to enhance local distinctiveness and sense of place.

3. The Core Strategy seeks to establish, as far as is practicable, the need for retail, leisure and other main town centre type uses over the Plan period and to ensure that these needs are not compromised by limited site availability. Policy CS05 should therefore be read and understood in conjunction with policy CS08 on Retail, Leisure and the Hierarchy of Centres (see Matter Statement on Issue 2 Questions (iv) and (v)). Office development is also dealt with separately under policy CS07 (see Matter Statement on Issue 2 Question (i)).

4. In recognition of the fact that it is unlikely that the scale and form of development incorporating town centre type uses (particularly larger floor plate modern retail units) can be accommodated within the existing Primary Shopping Area, the Heritage Quarter sites are identified as a Key Site. This is the Council’s preferred option for a logical extension to the Primary Shopping Area, as fully explained in the supporting documents (see pages 98 – 112 of SCS-14c: Proposed Submission Gravesham Local Plan Core Strategy Appendices May 2013 (tracked changes version); Section 5 of RET-01: Retail and Commercial Leisure Study Background Paper Dec 2012; Section 4 of RET-02: Retail Study Update March 2012; and Section 5 of JUL12-01: Gravesend Town Centre and the approach to Retail and other Main Town Centre Type Development July 2012).

5. For information, it should be noted that proposals for the Heritage Quarter have been subject of a planning application (GR/2012/0931). This is a hybrid application including 141 dwellings, restaurants, a hotel and other works in the Eastern Quarter (full application), along with a mix of A1 [@7,300 sqm net] – A5 uses, offices and between 164 – 187 dwellings and other works in Western Quarter (outline application). It benefits from a resolution to permit subject to a section 106 legal agreement and is proceeding to determination.

(i) **Is the policy and the proposals for growth and change in this area appropriate and justified, including in relation to the NPPF, and in terms of environmental, economic and social impact, including in relation to the Heritage Quarter?**

6. The Council is of the view that the Plan’s overall approach toward Gravesend town centre is consistent with the NPPF (NAT-01). The “Conformity of the Submission Gravesham Local Plan Core Strategy with the National Planning Policy Framework and the Planning Policy for Traveller Sites May 2013” (SCS-08) sets out how the Plan is consistent with each paragraph of the NPPF. Paragraphs 23 – 27 on ‘Ensuring the vitality of town centres’ are relevant to retail, leisure, the hierarchy of centres, and cultural/tourist development. The Proposed Submission Gravesham Local Plan Core
7. In identifying Gravesend town centre as a strategic location to accommodate new development, the Council has been mindful of the requirement of the NPPF to achieve a sustainable form of development that, in combination, assists in the achievement of a range of economic, social, and environmental objectives (see paragraphs 7, 19, 21, 34, 35, 37, 70, 126 third bullet point of NAT-01: National Planning Policy Framework March 2012).

8. It is recognised in this context that the town centre acts as a focus of activity that is subject to change over time and that the built environment will inevitably be subject to remodelling as form follows function. A major challenge therefore will always be how to keep the town centre relevant to modern needs whilst addressing constraints and context. The risk of not embracing that challenge is that investment may be diverted to competing locations, to the detriment of the future vitality of the town centre.

9. A consistent message derived from the evidence is that Gravesend town centre requires investment in modern retail facilities to attract new multiple comparison outlets to diversify and improve the quality of its offer and to complement what it already has (see Section 4 of RET-02: Retail Study Update March 2012 and Section 5 of RET-05: Gravesham LDF Retail and Commercial Leisure Study Final Report Dec 2009). This is not to say that the Council sees the town centre only in terms of its retail function, rather that shopping is one of the defining functions from which it derives its historic character and sense of place. It is considered that there is no inconsistency between seeking to foster a multi-functional, diverse and resilient town centre that has regard to heritage and riverside context whilst ensuring that its retail offer is also modernised and improved.

10. The Council therefore contends that the strategic approach adopted toward the town centre is both appropriate and justified in terms of environmental, economic and social impacts.

11. Seeking to concentrate development within the town centre as an accessible location assists in facilitating sustainable lifestyles and a reduction in environmental impact compared to a more dispersed pattern of development. Economic benefits include more jobs within the town centre and increased levels of trade and service provision than might be achieved by a more dispersed pattern of development. Proximity of business activity within the town centre also brings with it potential synergies whereby higher levels of growth might be encouraged. In terms of social benefits, concentration of activity within the town centre has the potential to make access to services and the connections between them easier.

12. Overall, the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) of the Plan supports the approach adopted, stating that it is likely to have long-term positive effects on the Borough’s economy, through encouraging the regeneration of the town centre as a sustainable location (see SCS-13 Gravesham Local Plan: Sustainability Appraisal/Strategic Environmental Assessment 1 Technical Report December 2012 especially Table 5.2 page 36 for overview).
13. In terms of the identification of Heritage Quarter as a key site, the reasoning behind this and an assessment of alternatives sites in and around the town centre is set out in section 5 of the Gravesend Town Centre and approach to Retail and other Town Centre Type Development July 2012 paper (Jul12-01). This is seen as a logical extension to the Primary Shopping Area, with the main modern retail component linked directly to New Road via the existing St George’s Centre. As a well-connected edge-of-centre site, it is contended that this is consistent with the approach set out in the NPPF and other national guidance.

14. Concentrating higher density mixed-use development in Heritage Quarter to reinforce previous investment in that area is therefore considered to be an appropriate policy response.

Response to key issues raised on Policy CS05 during the Proposed Submission Local Plan Core Strategy consultation

15. The Council received a number of comments regarding policy CS05 as a result of the Proposed Submission Gravesham Local Plan Core Strategy consultation process. Key issues raised in relation to policy CS07 are set out in the Consultation Statement May 2013 – including Errata (SCS-03) at paragraphs 8.54 – 8.59. Some amendments have also been made to the text of the Core Strategy to provide clarification and correct minor errors. These are set out in the Proposed Submission Gravesham Local Plan Core Strategy Schedule of Proposed Minor Amendments May 2013 (SCS-14a) at references A57 – A68.

16. Key issues raised by consultees at the Proposed Submission Gravesham Local Plan Core Strategy consultation stage and the Council’s position on each is as follows:-

An Area Action Plan should be produced

There are a number of areas of change, including the town centre and these are defined as Opportunity Areas in the Plan. The approach set out in the Core Strategy combines giving a clear policy steer for each area whilst not treating them in isolation. It provides a coherent and co-ordinated spatial strategy for the Borough as a whole, with the important decisions that need to be made in terms of strategic priorities included in the Core Strategy and not a subservient document. This also accords with the policy approach set out in the NPPF whereby additional development plan documents should only be used where clearly justified (see paragraphs 150 – 157 of NAT-01: National Planning Policy Framework March 2012).

There is no rounded vision for the future of the town centre as a focus for shopping, leisure, service provision, culture or tourism. It is too focused on retail headroom.

The Council is of the opinion that its vision and policy for the town centre is rounded and recognises the importance of this location as a multi-functional centre at the heart of the borough.
At the same time, paragraph 23 of the NPPF states that it is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. In developing its strategy, the Council has sought to identify the general scale of need and any instances where there is a specific requirement justifying a strategic site allocation. The analysis has focused primarily on retail need because that is where industry standard analysis is most developed.

It would also be surprising if the Council had not sought to identify need in this area given that retail is and is likely to remain a significant use of land over the Plan period – even given the impact of competing centres or e-tailing. Identifying need for other uses has proven to be more difficult because of weak market demand, the lack of established methods to objectively assess need, or the fact that there is uncertainty over projects and their delivery.

This does not mean that additional allocations cannot be made through the proposed Site Allocations and Development Management Policies DPD at a later stage, should further information on other needs or projects emerge before it is prepared.

Consideration needs to be given to finding a new role for the town’s traditional shops and streets.

The intention of the Heritage Quarter development is that it complements the existing town centre offer to make it a more attractive place to live in, work, visit and shop. Increased activity in itself will help to bolster trade taking place in the town’s traditional shops and streets – particularly as the economy begins to grow again over the Plan period.

Those traditional shops and streets that are currently performing less well tend to be peripheral to the commercial core of the town centre and/or small units (sometimes in a poor state of repair) that are unattractive to the market.

The challenge here appears to relate more to town centre management (where the Council has a very good record) rather than the strategic approach subject of policy CS05.

There are objections to the approach for the Heritage Quarter (within sub-area 3.1), the development of which would result in over-development, deplete open space and disregard the townscape and heritage interest.

It is inevitable that in undertaking major development within a heritage riverside town such as Gravesend that a balance will need to be struck between a range of competing objectives such as regeneration, maintaining the vitality of the town centre, open space provision, townscape and heritage. The Council is of the opinion that policy CS05 is soundly based and has achieved an acceptable balance. The resolution to grant planning permission to the Heritage Quarter development under GR/2012/0931 is indicative that an acceptable scheme can be achieved reflecting the overall quantum set out in the policy. English Heritage has made no objections to the Core Strategy.
Lord Street and Parrock Street car parks (within sub-areas 3.1 and 3.3) should be key sites and considered as alternatives to the Heritage Quarter key site. The work on car parking provision should already have been carried out to inform the consideration of alternatives and the identification of key sites.

Urban Gravesham contend that the Council has not considered Lord Street/Parrock Street as an alternative to Heritage Quarter for both retail and housing. However, the longer term mixed-use development potential of the Lord Street and Parrock Street car parks is recognised at paragraph 4.6.31 of the Plan.

The Council did consider Lord Street and Parrock Street car parks as an alternative to Heritage Quarter, particularly in terms of the delivery of new retail floorspace (see section 5 of the (Jul12-01) Gravesend Town Centre and the approach to Retail and other Main Town Centre Type Development July 2012 document). The conclusion reached was that Heritage Quarter would be the preferable option.

Whilst there is no reason why housing should not form part of a mixed-use development of Lord Street/Parrock Street in the longer-term, this is different from saying that it is an alternative to Heritage Quarter rather than being a potential addition to it.

The Transport Quarter (within sub-area 3.1) proposals are unworkable, lack funding and are subject to traffic modelling.

The Transport Quarter proposals are being developed in conjunction with the Kent County Council as local Highway Authority and benefit from an outline planning permission (GR/2010/0098) that is being implemented in phases.

The Rathmore Road link is subject to a detailed planning application (KCC/GR/0148/2012) by Kent County Council, the body responsible for its delivery. Further transport modelling has been undertaken as part of this process to refine the design given the link is now likely to come forward in advance of the transport interchange itself. It is anticipated that this application will be determined in Summer/Autumn 2013 to allow works to progress.

Policy CS05 is not dependent on the permitted scheme (GR/2011/0246) for the transport interchange building coming forward – it simply refers to support for the principle of improved public transport access, including provision of an integrated transport interchange at Garrick Street/Barrack Row.

Paragraph 4.4.16 sets down a marker that if the current proposals are not implemented in full, the Council will still require the provision of a public transport interchange in this location. This is considered to be a logical place to create such an interchange, building on existing investment in the Garrick Street bus bays close to the railway station and the Primary Shopping Area.

(ii) Are they clear and deliverable, including in respect of the associated transport and other infrastructure requirements?
17. The Council is of the opinion that the policy and proposals are clear and deliverable over the Plan period, including associated transport and other infrastructure requirements. Infrastructure requirements related to Gravesend Town Centre and mechanisms for delivery are set out in Appendix 4 to the Plan (see SCS-14c - Proposed Submission Gravesham Local Plan Core Strategy Appendices May 2013 [tracked changes version]).

18. The main development proposal in the town centre is Heritage Quarter, which is subject of a resolution to grant planning permission (GR/2012/0931). The fact that the developer is actively progressing the scheme and has indicated that works will commence in 2014 and be built out by mid-2018 should be accorded weight.

19. Whilst the proposal was subject of a financial assessment to determine the ability of the scheme to meet s.106 requirements, it is accepted that the developer will have a more detailed understanding of the commercial viability of the scheme than the Council. The developer is therefore unlikely to be making such a significant commitment in terms of time and resources without expecting a return on investment.

20. Issues in relation to Transport Quarter are dealt with under the final sections of Paragraph 16 at page 8 above. Delivery of the project and its different elements is covered separately in Matter Statement 4 (vi) to (vii) on policy CS11 relating to Transport.

21. The remaining issues in relation to infrastructure in the Gravesend Town Centre Opportunity Area relate to water supply and sewer capacity raised by Southern Water Services in connection with the Heritage Quarter key site. The Council is of the view that these issues can be dealt with under the normal requisition procedures contained in the Water Industries Act and associated regulations at the application stage. They are not therefore considered to be an impediment on the timely delivery of development. The infrastructure required does not appear to be of a strategic scale or nature and the Council is of the view that the proposed change to policy wording has not be justified and (if it were to be justified) should properly be a matter for the proposed Site Specific Allocations and Development Management Policies DPD and not the Core Strategy.

**Further Proposed Minor Changes**

22. The following further proposed minor changes shown in blue are suggested to ensure compatibility with the other opportunity areas which do not include non-B class employment within their respective key site policies:

4.6.26 Heritage Quarter West would function as a logical extension to St George's Centre and be located relatively close to the proposed public transport interchange. It is anticipated that it could accommodate around 7,340 sq.m (NIA) retail floorspace. This could be entirely comparison retail floorspace or it may include a convenience retail floorspace element. Heritage Quarter East could provide complementary uses such as restaurants and bars which help improve the town's evening economy and a hotel to improve tourist provision. The key site could also accommodate residential development, especially Heritage Quarter East, and make provision for office uses. **It will provide around 473 new jobs of which 21 will be from B class.**
employment. It would need to make provision for public car parking to replace that lost as a result of development.

4.6.42 Development of the Heritage Quarter Key Site will provide a high quality, mixed use development of around 327 dwellings, 255 sq.m office floorspace (B1a), and around 8,533 sq.m (NIA) of commercial floorspace (7,340 sq.m retail floorspace (primarily A1 comparison floorspace), up to 1,591 sq.m food and drink floorspace (use classes A3, A4 and A5), and an hotel) which will provide around 473 new jobs. It will reconnect the town centre with the River Thames, High Street and surrounding areas and reinforce Gravesend’s character as a riverside heritage town. Replacement public car parking and improvements to the open space at St Andrews Gardens will be provided as well as a replacement St Georges Church Hall.