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**TONBRIDGE AND MALLING
BOROUGH COUNCIL**

**RETAIL ASSESSMENT STUDY –
REVIEW OF EXISTING RETAIL
HIERARCHY**

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1.0 INTRODUCTION

- 1.1 This Retail Assessment has been prepared by Nathaniel Lichfield and Partners (NLP) on behalf of Tonbridge and Malling Borough Council (TMBC).
- 1.2 The Retail Assessment responds to TMBC's requirement for a retail assessment to inform the forthcoming Local Development Framework (LDF) Documents. This analysis provides an assessment of the retail hierarchy within the TMBC area.
- 1.3 The study brief specifically excludes work relating to Tonbridge Town Centre, reflecting the Tonbridge Town Centre Study prepared by NLP in November 2004 (including work done in June 2004) which remains relatively up to date.

Retail Assessment Study Brief

- 1.4 The scope of work is set out in a study brief prepared by NLP and TMBC and contained at Appendix 1.
- 1.5 In summary, the scope of works is to undertake an assessment of the current retail hierarchy within the TMBC area, in the light of both guidance in PPS6 and input from TMBC, and advice on possible changes to this since preparation of the adopted Local Plan. Drawing on available data derived by both TMBC and NLP this seeks to address both the current and potential future role taking account of existing provision, the range and level of retail/other provision in each centre and potential significant changes arising from major retail and residential commitments / proposals.
- 1.6 The resultant analysis, which follows site work undertaken in July/August 2005
 - comments on the role and function of each centre and the anticipated extent of its catchment area (based on its geographical location and surrounding centres/facilities);
 - assesses each centre against the criteria of local centres and district centres within PPS6 (Annexe A, Table 1); and
 - provides a sound methodological basis to underpin any subsequent changes to the retail hierarchy.

Scope of Report

- 1.7 This report, which is supported by a number of appendices,
- summarises the rationale for the retail assessment in terms of National Planning Policy Guidance (Section 2.0);
 - sets out the existing retail hierarchy within the TMBC area (Section 3.0), and potential factors which may contribute to changes in this hierarchy;
 - sets out the methodology for assessing each of the relevant centres (Section 4.0);
 - summarises the findings for each centre (Section 5.0);
 - sets out a series of conclusions and recommendations for further work to be undertaken within the Stage 2 analysis (Section 6.0).

2.0 RATIONALE FOR RETAIL ASSESSMENT

- 2.1 The Tonbridge and Malling Borough Local Plan was adopted in December 1998. These policies will be replaced by the emerging Development Plan Documents contained in the Local Development Framework, bringing the retail policies in line with PPS6: Planning for Town Centres (March 2005).
- 2.2 The Local Development Scheme for Tonbridge and Malling Borough Council was approved by the Secretary of State in March 2006. Section 5.0 of this sets out the proposed Local Development Documents (LDD's) which will in part form the Local Development Framework (LDF) for the Borough.
- 2.3 PPS12: Local Development Framework (2004) sets out Government policy on the preparation of Local Development Documents. Specifically PPS12 (para. 4.8) requires policies prepared by the Local Planning Authority to be founded on a thorough understanding of the needs of their area and the opportunities and constraints which operate within that area. Specifically,

“Local planning authorities should prepare and maintain an up to date information base on key aspects of the social, economic and environmental characteristics of their area”.

National Planning Guidance on Preparation of Retail Assessments

- 2.4 PPS6 sets out government guidance on promoting growth and managing change in existing centres (Section 2.0). It states (para. 2.15) that local planning authorities should adopt a positive and proactive approach to planning for the future of all types of centres within their areas, having regard to the regional spatial strategy and the community strategy.
- 2.5 Specifically, but in summary, LPA's should:-
1. assess the need for new floorspace for retail, leisure and other main town centre uses (taking into account both qualitative and quantitative considerations);
 2. identify deficiencies in provision;
 3. assess the capacity of existing centres to accommodate new development;

4. identify centres in decline;
 5. identify the centres within which development will be focused;
 6. identify the need for any new centres of local importance;
 7. develop strategies for developing and strengthening centres;
 8. define the extent of the primary shopping area and town centre for development centres;
 9. identify and allocate sites for development;
 10. review all existing allocations; and
 11. develop policies.
- 2.6 PPS6 suggests (para. 2.32) any study should reflect the catchment area of each of the centres within the Borough as well as the catchment area of centres outside the Local Authority's boundaries (which extend into them), rather than merely focusing on centres within the authorities administrative boundaries.
- 2.7 The assessment should address quantitative and qualitative need seeking to ensure an appropriate distribution of locations with provision made for a range of sites with shopping, leisure and local services. A number of tests (including scale of development, the sequential approach, impact and accessibility) arise from this initial assessment of need.
- 2.8 This Study undertakes the initial stages of this analysis ie. reviewing the existing retail provision and setting out preliminary comments on the scope (in qualitative terms) for centres to be the focus of development and potentially move up (or down) the retail hierarchy.

3.0 RETAIL HIERARCHY WITHIN TMBC

- 3.1 This section of the report briefly summarises the existing retail hierarchy as well as the main expected changes over the coming years in terms of retail proposals and commitments and the main areas of population growth.
- 3.2 As reflected in the NLP November 2004 Report, and in Plan 1 at Appendix 2, the retail geography relating to the administrative area of Tonbridge and Malling Borough Council (TMBC) is influenced by the surrounding centres of Maidstone, Sevenoaks, Tunbridge Wells and to a lesser extent by the Medway towns in the north of the Borough. The dominance of the surrounding centres is reflected in the publication Shopping Index 2003-04 prepared by Management Horizons Europe (MHE). This provides a ranking of the main shopping centres in the UK on the basis of a weighted index of multiple retailers present in each centre. This identifies that Tonbridge, as the 266th ranked centre is below Maidstone (54th – pre Fremlin Centre), Tunbridge Wells (66th) and above Sevenoaks (404th)
- 3.3 These centres exert a significant draw on existing comparison (and to a lesser extent convenience) expenditure within the Borough. In effect, many parts of the Borough form part of the natural catchment areas of these centres.

TMBC Retail Hierarchy

- 3.4 The currently defined retail hierarchy is set out in the adopted Local Plan. This defines Tonbridge as a Town Centre – the highest level in the Borough hierarchy. Policy 5/20 subsequently defines four district centres, all within the north east of the Borough.
- Lunsford Park.
 - Quarry Wood, Aylesford (identified in error in earlier versions of the Local Plan as Aylesford within policy 5/20).
 - Martin Square, Larkfield (identified in error in earlier versions of the Local Plan as Quarry Wood, Larkfield within policy 5/20).
 - Snodland.

- 3.5 These are defined (para. 5.5.1) as *“Shopping centres in the Borough which perform a district centre function serving the day to day needs of the immediate area”*. The relevant policy (policy 5/20) states that retail development is considered suitable in principle within district shopping centres and changes of use at ground floor level to a use which does not require a shopping centre location will not be permitted. Any non retail uses permitted under this policy shall be required to maintain a window display.
- 3.6 Policy 5/23 defines seven Urban Local Centres, which are defined (para. 5.6.1) as *“small local centres and shopping parades which provide for a range of local services and retail uses to serve day to day needs”*. These centres are:
- Shipbourne Road, Tonbridge;
 - Martin Hardie Way, Tonbridge;
 - York Parade, Tonbridge;
 - Twisden Road, East Malling;
 - Premier Parade, Aylesford;
 - Woodlands Parade, Ditton;
 - Little Market Row, Leybourne.
- 3.7 Policy 5/23 states that retail uses will be permitted in the Urban Local Centres while changes of use at ground floor level to a use which does not require a shopping centre location or does not provide an appropriate service for the day to day needs of the local community will not be permitted. Proposals for residential, business (B1) and town centre office uses (A2) will be acceptable except where it would lead to the loss of residential accommodation or give rise to on-street parking problems.
- 3.8 In addition, the mixed use area of Kings Hill is identified both as an urban Local Centre and as a mixed use area under policy P2/2. The Local Plan recognises (para. 2.5.1) that the redevelopment of the former West Malling Airfield as a mixed commercial business and residential area is now firmly established. The resultant policy P2/2 notes that acceptable uses include *“the provision of local shopping facilities of a scale adequate to meet the needs of the development”*.

Rural Local Centres

- 3.9 The plan also defines a number of Rural Local Centres (policy 6/20), which (para. 6.71) *“provide an important service to local residents”*. These centres are:
- Borough Green
 - East Peckham
 - Hadlow

- Hildenborough
- West Malling
- Wrotham

- 3.10 Policy 6/20 also identifies Leybourne Grange as a local centre, although whilst planning permission has been granted for this development, it has not yet been implemented.
- 3.11 The associated policy (P6/20) is permissive of retail development while seeking to prevent change of use at ground floor level to a use which does not require a shopping centre location or provide an appropriate service for the day to day needs of the local community.
- 3.12 In addition, Peters Pit is identified as a mixed use area under policy P2/7. This allocates the site for a range of uses including an element of employment, retail and leisure. The policy states *“the scale of local shopping facilities within this areas being adequate to meet the needs of the development, but complementary to other nearby local centres”*.
- 3.13 Finally, the Local Plan identifies the established concentration of retail warehousing at Cannon Lane, Tonbridge and Quarry Wood, Aylesford (para. 5.4.2).
- 3.14 In summary, there is limited retail comparison provision within the borough (beyond Tonbridge Town Centre and the undesignated retail warehouse facilities) and a significant draw on expenditure from competing towns around.

Retail Commitments

- 3.15 TMBC have provided information on retail commitments and proposals within the Borough. Where these are located in centres, they have the potential, once implemented, to enhance the role and function of the centre.
- 3.16 A number of these are located within Tonbridge Town Centre, and therefore do not fall within the area of this retail assessment. Similarly, some relate to retail warehouse proposals at Cannon Lane and Quarry Wood.
- 3.17 The principle retail commitments relevant to the centres (as at 31st December 2005) are:

- Former Post Office, London Road, Aylesford which we understand will result in an increase of around 417 sq.m of comparison floorspace.
 - Developments in the Kings Hill Area, which we understand give rise to an additional 2,018 sq.m. of Class A1 retail units and 595 sq.m. Class D1 medical services.
 - Increases to the floorspace of the Tesco store at Lunsford Park by approximately 1,709 sq.m.
 - A convenience unit of 122 sq.m. in East Peckham as part of a petrol filling station.
 - A scheme at Leybourne Grange with a floorspace of 1,000 sq.m. to be constructed as part of the overall housing development.
- 3.18 Whilst not forming a retail commitment, we understand that there is an undetermined planning application submitted by Asda in February 2006 for an extension (by way of a mezzanine) within their existing Kings Hill store.

TMBC Large Scale Housing Commitments and Proposed Commitments

- 3.19 TMBC have provided information on large scale housing commitments and proposals within the Borough. Areas of significant forecast population growth are likely to generate a requirement for further retail floorspace in the vicinity. The implications of the proposed housing development is considered in further detail in Section 5.0.
- 3.20 The main housing commitments are summarised below and also identified on Plan 1.
- Holborough Quarry: 1,000 dwellings (under construction)
 - Leybourne Grange: 723 dwellings (commitment)
 - Kings Hill: 750 dwellings (commitment)
 - Borough Green: 200 dwellings (proposed)
 - Peters Pit: 1,000 dwellings (commitment)
 - Bushy Wood: 1,500 dwellings (post 2016 allocation)
 - Franstacht site (Larkfield): 307 dwellings (commitment)

4.0 METHODOLOGY

4.1 We have assessed each of the defined centres, and the main retail warehouse facilities against a number of criteria and drawing on a number of sources. A detailed summary of each of the District Centres, Urban Local Centres and Rural Local Centres and other locations are contained at Appendices 3, 4, 5 and 6 respectively.

4.2 The relevant criteria draw on a number of sources, including data held by TMBC, published data sources (including the Directory of the Institute of Grocery Distribution and GOAD) as well as site visits undertaken by NLP.

4.3 We summarise the relevant criteria and data sources below.

- **Current Designation:** TMBC Local Plan 1998
- **Summary of Centre:** NLP site visit
- **Accessibility/Parking:** NLP
- **Floorspace Data:** Floorspace data has been provided by TMBC. This is based on an analysis of the footprints of retail units as well as recent planning permissions for the main retail developments.

NLP, drawing on historical TMBC data have assessed both the current and historical number of units within each centre.
- **Upper Floor Uses:** NLP site visit
- **Main Food Stores:** NLP site visit drawing on IGD data (where relevant)
- **Community/Non Retail Facilities** NLP site visit
- **Constraints / Opportunities within retail hierarchy** NLP in discussion with Officers at TMBC
- **PPS Assessment of range of facilities :** NLP

PPS 6 Definitions of Centres

- 4.4 In assessing the role and function of each centre we have also had regard to the PPS 6 definition of centres. District Centres are defined (table 1 : Types of Centre and their main characteristics). This states

“District Centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non retail services such as banks, building societies and restaurants, as well as local public facilities such as a library”

- 4.5 It continues

“Local Centres include a range of small shops of a local nature, serving a small catchment. Typically local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. In rural areas, large villages may perform the role of a local centre.”

- 4.6 The footnote states that *“small parades of shops of purely neighbourhood significance are not regarded as centres for the purposes of this policy statement”*.

- 4.7 Section 5.0 sets out a summary of each of the centres in the context of each of these criteria and PPS 6 definitions. As seen from the subsequent tables, and typical of centres nationally, centres will frequently contain some but not all of these facilities. In general terms District Centres will usually have reasonable facilities to carry out some form of weekly main food shopping (either by way of a single food store or a range of shops) and provide access to services such as a bank etc. Local Centres will typically serve a smaller catchment.

- 4.8 In looking at the function and future functions of these centres, we have had regard to these factors as well as proximity to other centres / facilities that may influence their catchments and potential catchments.

5.0 SUMMARY OF CENTRES

5.1 This section of the report assesses each of the centres in the Borough.

Lunsford Park District Centre

5.2 Lunsford Park is dominated by the Tesco food store (which has recently been extended) with very limited other retail and community facilities. Whilst the Tesco store has recently been expanded, the historical survey indicates that the number of other units has fallen from three in 1994 to two in 2005.

5.3 Longer term, these facilities may experience increased demand from the housing developments at Holborough Quarry, Leybourne Grange and, beyond this, Bushy Wood, although other stores/facilities are also well placed to benefit from this increased expenditure.

5.4 The centre performs poorly against the PPS6 criteria based definition of a district centre, it lacks both the range of retail facilities as well as non retail facilities found within these centres. The Tesco store itself does however include within it a pharmacy and café which contribute to the range of services available.

Quarry Wood, Aylesford

5.5 The Quarry Wood District Centre consists solely of the Sainsbury's superstore, although adjacent to eight retail warehouse units selling primarily bulky goods products. The Sainsbury's food store has a floorspace of around 4,162 sq.m net. As with Lunsford Park, the centre lacks a number of retail and non retail facilities generally found within district centres.

Martin Square

5.6 Martin Square has around 17 retail units and accordingly a much wider range of retail/service facilities than either Lunsford Park or Quarry Wood. Convenience provision within the centre is rather limited (a medium sized Somerfield store with a floorspace of around 1,361 sq.m). The centre performs fairly well when assessed

against facilities usually found within district centres as it has a range of shops, as well as a wide range of community services including a library and health centre.

- 5.7 There is fairly limited scope for Martin Square's position within the retail hierarchy to change substantially, and given its proximity to Lunsford Park, it is likely to compete with this facility for increases in available expenditure.

Snodland District Centre

- 5.8 Snodland has the largest number of retail / service units (around 44) of any of the four district centres, although conversely it has the weakest convenience function with just two small food stores (an Alldays and a Co-op) present within the centre. This may be as a result of its proximity to Tesco at Lunsford Park.
- 5.9 Given the number of retail units present in the centre and the community facilities (including a surgery and dental practice) the centre performs well against an assessment of the PPS6 criteria for a district centre, although as noted above, it does lack a supermarket / superstore.

Shipbourne Road Urban Local Centre, Tonbridge

- 5.10 Shipbourne Road is located to the north of Tonbridge Town Centre. The designated centre contains no convenience shopping (although there is a small One-Stop store and post office nearby) and the historical data suggests that a number of retail units have been converted into housing which further weakens the role of the centre. The centre contains few of the facilities generally found within local centres as it does not contain a small supermarket/newsagents, sub-post office or pharmacy.

York Parade Urban Local Centre, Tonbridge

- 5.11 York Parade comprises a purpose built local centre existing of two parades of shops. The centre is anchored by a recently refurbished Somerfield food store which offers a range of convenience goods. Overall, the centre has the characteristics of a local centre. The historical data suggests that York Parade has maintained its function within recent years.

Martin Hardie Way Urban Local Centre, Tonbridge

- 5.12 The centre comprises around 13 retail units although has limited community facilities. The convenience provision is primarily in the form of a small Co-op store which offers a limited range of convenience goods. The historical data suggests no major changes have occurred to the retail offer in the centre. Overall, the centre has many of the facilities frequently found within a local centre.

Twisden Road Urban Local Centre

- 5.13 Twisden Road consists of a small purpose built shopping parade dominated by a One Stop food store and including various hot food takeaways. The historical data suggests that in recent years the range of retail choice has declined with a greengrocer, newsagent and bookmakers all closing being replaced with hot food takeaways and a volunteers service.
- 5.14 Overall, notwithstanding its small size the centre has many of the facilities associated with a local centre with the exception of a pharmacy.

Premier Parade, Urban Local Centre, Aylesford

- 5.15 The centre consists of a purpose built shopping parade containing six units including a small Mace food store (which appears to have contracted recently). There are very limited community facilities within the centre.
- 5.16 Overall, the centre has a number of characteristics of a local centre although lacks a pharmacy and a sub post office.

Woodlands Parade Urban Local Centre, Ditton

- 5.17 The centre is similar in nature to both Premier Parade and Twisden Road in being purpose built and containing a small food store and limited range of retail services. The main food store is the Premier Food Mini-Market, there are no significant community facilities within the centre.
- 5.18 The historical data suggests there has been a reduction in the number of convenience retailers in recent years and their replacement by a charity shop and business centre.

- 5.19 Overall, the centre has a number of the characteristics of an urban local centre although lacks a sub post office and pharmacy.

Little Market Row Urban Local Centre, Leybourne

- 5.20 This small centre has five retail units including the Little Market store which acts primarily as a newsagent also selling a limited range of convenience goods. A medical centre situated behind the parade and Leybourne Village Hall is located within the designated centre.

- 5.21 The historical data suggests that the retail function has been relatively steady since 1994. Overall, the centre has some of the characteristics of a local centre although it lacks a post office, pharmacy, hot food takeaway and launderette

Kings Hill Urban Local Centre

- 5.22 Kings Hill Centre performs part of a much wider plan led redevelopment of the former West Malling Airfield. The centre is dominated by an Asda superstore, with a further 18 units including a number which are currently vacant (reflecting the fact that they have recently been developed and are not yet occupied). There are also a number of community facilities in the wider area, although these are limited within the actual defined centre itself.

- 5.23 The presence of the Asda superstore, large number of retail units and restaurants suggests that the centre has the potential to perform a district centre rather than a local centre role. In addition, as a focus of residential development, it is likely to be appropriate to assess the level of floorspace which could be accommodated in this location to serve the developing communities, without conflicting with the Local Plan policy requirement summarised in Section 3.0 that retail development should be of a scale to meet the needs of the development.

Borough Green Rural Local Centre

- 5.24 Borough Green is contained within a fairly isolated location in the north west of the Borough, some distance from Sevenoaks, Tonbridge and other competing facilities.
- 5.25 The centre has a relatively high number of units (around 32) and there are also some retail parades outside the defined area. Despite the relatively high number of units however the centre lacks significant convenience provision, with a Nisa local store

being the largest food store within the centre and a small Co-op being located outside the centre adjacent to the railway station.

- 5.26 There are also a wide range of community facilities including a library, village hall, church hall, primary school. Therefore, the centre contains a number of elements normally found within district centres including banks / building societies, restaurants and a library. It does however lack a supermarket/superstore.

West Malling Rural Local Centre

- 5.27 West Malling is a significant rural local centre with around 88 units (almost 50% of which are in comparison use). The convenience function of the centre (around 10% of units) whilst being broadly consistent with the average of all centres surveyed by GOAD lacks a significant food store with the largest store being a Tesco Metro with a net floorspace of around 600 sq.m.
- 5.28 The retail units present, as well as community facilities including a police station, library and village hall etc. means that the centre is likely to perform a role close to that of a district centre, albeit it lacks a supermarket/superstore.
- 5.29 In the longer term, the scope for West Malling to increase its market share may be threatened by development at Kings Hill and in considering the level of retail development to be permitted subsequently at the latter it would be appropriate to consider any impact on West Malling.

Wrotham Rural Local Centre

- 5.30 Wrotham is a small centre located north of Borough Green at the north west of the Borough. Its more isolated position, as well as its proximity to Borough Green are likely to clearly constrain the retail function of the centre. It lacks a large food store and the historical survey data suggests that since 1977 a number of former retail units have been lost to residential use. The existing units are likely to come under increased pressure for alternative developments, notwithstanding its important role for surrounding residents.

East Peckham Rural Local Centre

- 5.31 East Peckham is a Rural Local Centre located east of Tonbridge. There are only nine units in the centre with the main food store being a Co-op around 120 sq.m. The

historical data suggests the retail function of the centre has remained largely constant in recent years.

- 5.32 The centre has a number of facilities originally identified with a local centre including restaurants and a library.

Hadlow Rural Local Centre

- 5.33 Hadlow is located north east of Tonbridge on the A26. The centre has 13 retail units (almost half of them in convenience use) the largest of which is Hadlow Grocers. There is also a butchers, fruit and vegetable store and bakers.
- 5.34 There are a relatively high number of community facilities in the centre including a primary school, library and medical centre/surgery.
- 5.35 Overall therefore the centre has the principle characteristics of a local centre but also contains some facilities (including a restaurant/library) consistent with a district centre.

Hildenborough Rural Local Centre

- 5.36 Hildenborough is a small centre to the north west of Tonbridge Town Centre containing around eight units, with the One Stop Shop being the principal convenience store. The historical data suggests that the retail function of Hildenborough has changed little in recent years.
- 5.37 Overall, Hildenborough appears to function as a Rural Local Centre but also contains banks / building societies and a library which are consistent with a centre higher up the retail hierarchy.

Peters Pit

- 5.38 As noted above, St Peters Pit is allocated within the adopted Local Plan for mixed use development including retail. To date however no retail development has occurred.

Other Retail Facilities

- 5.38 We have reviewed both Quarry Wood Retail Park and Cannon Lane Retail Park. Neither of these facilities display any characteristics that suggest it would be appropriate to redesignate them as local or district centres defined within PPS6.

6.0 CONCLUSIONS AND RECOMMENDATIONS

6.1 This analysis has reviewed the four district centres, eight urban centres, and seven rural local centres currently defined in the TMBC Local Plan as well as the main retail warehouse facilities. It has assessed their retail and other functions and how each of them performs against the criteria of District and Local Centres within PPS6.

6.2 We have also had regard to major retail and housing commitments and proposals as these form contributory factors to the scope for centres to move either up or down the hierarchy over the coming years.

Existing District Centres

6.3 Of the four district centres Martin Square, Larkfield complies with many of the criteria of a District Centre. Snodland, has the largest number of retail units of the four centres, but conversely has the weakest convenience function. There may be scope for both these centres to increase their convenience function to enable them better to meet weekly convenience shopping needs although this may be constrained by their proximity to the Tesco at Lunsford Park.

6.4 Both Lunsford Park and Quarry Wood, Aylesford are dominated by a single food store (Tesco and J Sainsbury respectively). Both centres therefore perform poorly against the PPS6 criteria of district centres given the lack of other service and retail facilities. Accordingly it is appropriate to consider whether it is realistic to seek to focus additional retail/service development in one or both locations to enhance their ability to perform a district centre function or whether this development would be better focussed in other locations, with these two locations being downgraded.

Other Recommendations

6.5 Kings Hill is the focus of considerable recent development. Given the scale of retail development already present, including a large Asda Store, it is likely to be performing the role of a District Centre, and this retail function is likely to be enhanced when the further residential development is brought forward. We suggest that

- consideration be given to upgrading Kings Hill to a district centre reviewing whether there is scope to accommodate further retail floorspace.
- 6.6 Consideration will also need to be given to the form and level of retail development permitted at Peters Pit. The recent outline planning permission is for a *“mixed use village centre (including A1, A3 and B1 use) community facilities and primary schools”*. It is likely this centre will perform the role of a local centre.
- 6.7 West Malling has a large number of retail units (almost 90) as well as a large number of community facilities and appears to function more akin to a District Centre, although it lacks a main food store. We suggest that consideration be given to upgrading its role to a district centre including examining whether there is scope for it to increase its convenience function.
- 6.8 Borough Green also forms a significant rural Local Centre, and the number of retail units and other services present suggest that its role is consistent with that of a District Centre. As with West Malling, it does however lack a significant convenience store. We suggest that consideration be given to upgrading its role to a district centre including examining whether there is scope for it to increase its convenience function.
- 6.9 A number of Urban Local Centres and Rural Local Centres are contracting, with the historical survey data suggesting the retail uses are coming under pressure for other uses, principally residential. These centres include Shipbourne Road and Wrotham. Twisden Road, East Malling also appears to be coming under pressure. There is likely to be limited scope to focus further retail development in these locations, but the existing retail uses should be protected as they are largely well placed to serve existing communities. Whilst it is questionable whether it is still appropriate for some of these locations to be classified as centres. PPS 6 advises (para 2.58) that Local Authorities should, where appropriate, seek to protect existing facilities which provide for peoples day to day needs. Therefore if some of these locations are removed from the retail hierarchy it would still be appropriate for TMBC to take a policy approach to protect the existing facilities.
- 6.10 Having reviewed the two main retail warehouse locations (Quarry Wood and Cannon Lane) we do not consider it is appropriate for this designation be taken forward through the Local Development Framework process. Whilst both Hadlow and Hildenborough have some facilities consistent with a District Centre (ie. restaurant,

bank and library) overall, the retail function of these centres is consistent with a Local rather than a District Centre.

Recommendations

- 6.11 Our initial suggestion is that further work is carried out to provide a quantitative assessment on:
- the scope for Snodland to increase its convenience function;
 - the scope for Martin Square, Larkfield to increase its convenience function;
 - the scope for Borough Green to increase its convenience function;
 - the scope for West Malling to increase its convenience function at Kings Hill of a scale appropriate to meet the needs of the development.
- 6.12 Notwithstanding the results of any quantitative analysis, our site visit suggest that there may be limited sites providing the opportunity to increase the retail facilities within these centres (with the exception of Kings Hill). We also understand from TMBC that there have been no approaches from developers or retailers seeking significant retail developments within these locations.