



GL Hearn

Part of Capita Real Estate

Canterbury Sequential Assessment and Wincheap Capacity Study

Canterbury City Council

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Prepared by

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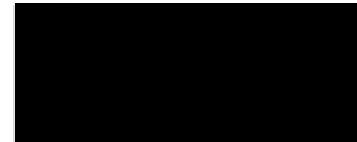
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1 INTRODUCTION

- 1.1 GL Hearn (GLH) was commissioned in November 2015 by Canterbury City Council (CCC) to prepare a report to assess the sequential opportunities and the site capacity of the Wincheap area to accommodate the retail needs identified in the GLH Retail and Leisure Study for Canterbury which was completed in June 2015.
- 1.2 The purpose of the sequential assessment is to consider the scope for in and edge of centre sites to accommodate the identified need. This assessment also considers whether there are any out of centre sites which could accommodate the needs currently identified for the Wincheap area to accommodate a satellite retail centre as envisaged in Policy TCL7 of the Canterbury District Local Plan (2014) Submission Version.
- 1.3 To assist in assessing site capacity, GLH commissioned architects/master planners BDP as sub consultants. This report sets out the combined findings.

2 POLICY CONTEXT

2.1 This section provides a review of the planning policy context in respect of the application of the sequential approach to site selection. We consider the guidance contained with the NPPF and the Planning Practice Guidance (PPG) as well as considering the hierarchy of centres currently proposed in the Canterbury District Local Plan Publication Draft (2014) (CDLP).

NPPF

2.2 Pages 37-42 of the NPPF relates to plan making and identifies that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and that Local Plans should be aspirational but realistic.

2.3 It goes on to identify that crucially, Local Plans should (amongst others) allocate sites to promote development and flexible use of land, bringing forward new land where necessary and provide detail on form, scale, access and quantum of development where appropriate.

2.4 Specifically in relation to business needs, the NPPF states that local planning authorities should use their evidence base to assess (amongst other things):

- the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;
- the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land;
- the capacity of existing centres to accommodate new town centre development.

2.5 Section 2 of the NPPF specifically relates to ensuring the vitality and viability of town centres and covers both plan making and decision taking. This identifies that in drawing up Local Plans, local planning authorities should (amongst other things):

- define a network and hierarchy of centres that is resilient to anticipated future economic changes;
- promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;
- allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. 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. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;
- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of

centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;

- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres.

Planning Practice Guidance

2.6 The Planning Practice Guidance (PPG) provides additional clarification on the national policy contained within the Framework. It includes a section titled “*ensuring the vitality of town centres*” which requires that local planning authorities should assess and plan to meet the needs of main town centre uses in full, adopting a town centre first policy.

2.7 Following this, the PPG also expects that Local planning authorities should take full account of relevant market signals when planning for town centres and should keep their retail land allocations under regular review. These market signals should be identified and analysed in terms of their impacts on town centres. This information should be used to inform policies that are responsive to changes in the market as well as the changing needs of business.

2.8 Thereafter there is section titled: What if the required development cannot be accommodated in the town centre? This states that:

It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests. This should ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise, as set out in paragraph 26 of the National Planning Policy Framework.

2.9 The PPG goes on to advise that in plan-making, the sequential approach requires a thorough assessment of the suitability, viability and availability of locations for main town centre uses. It requires clearly explained reasoning if more central opportunities to locate main town centre uses are rejected.

2.10 The checklist below sets out the matters that should be considered when taking a sequential approach to plan-making:

- Has the need for main town centre uses been assessed? The assessment should consider the current situation, recent up-take of land for main town centre uses, the supply of and demand for land for main town centre uses, forecast of future need and the type of land needed for main town centre uses;
- Can the identified need for main town centre uses land be accommodated on town centre sites? When identifying sites, the suitability, availability and viability of the site should be considered, with particular regard to the nature of the need that is to be addressed;

- If the additional main town centre uses required cannot be accommodated in town centre sites, what are the next sequentially preferable sites that it can be accommodated on?

2.11 It also goes on to acknowledge that Local Plans should contain policies to apply the sequential test to proposals for main town centre uses that may come forward outside the sites or locations allocated in the Local Plan.

Canterbury District Local Plan Publication Draft (2014)

2.12 The publication draft of the Canterbury District Local Plan identifies a hierarchy of centres which is considered to be resilient to future economic changes. This defines Canterbury City centre as a sub-regional centre for retail. The Local Plan notes that the changes in national trends are likely to result in a continued increase in the demand for the City as a retail destination. Canterbury needs to make the most of this opportunity, encourage investment in the centre, attract more of the big retail names, support the independent sector and expand the centre to meet an identified retail need. It is essential that the Council seeks to safeguard its strong retail offer in the Primary Shopping Area and retain its position as an important sub-regional centre for retail and consumer services, providing for the needs of residents, students, workers, tourists and the visitor economy generally.

2.13 In addition to Canterbury, the Local Plan defines district centres at Herne Bay and Whitstable, which have a complementary role as part of the established retail hierarchy, serving the local population. They ensure a sustainable focus and pattern for development and their position within the retail hierarchy will continue to ensure they have opportunities to enhance and strengthen their role.

2.14 Thereafter Local Neighbourhood Centres contain a range of small shops of a local nature, such as a small supermarket, newsagent, sub-post office and pharmacy and potentially other services such as a hot-food takeaway and launderette. The larger villages perform the role of village centres, and may typically include a small convenience shop, newsagents and sub-post office.

2.15 The comparison (non-food) retail need identified for Canterbury City is significant. In order to maintain Canterbury's current role and competitive position in the retail hierarchy it follows that the Council should seek to meet this need and the Local Plan is seeking to address this through Policy TCL7 of the draft submitted Local Plan 2014 which relates to the "Wincheap Retail Area". This states that:

"The Wincheap Retail Area, as shown on the proposals map, will be developed as a satellite retail area of Canterbury City, focused on retail and leisure provision. The Council will facilitate the implementation of a comprehensive mixed-use redevelopment. Any scheme will be required to:

- a) *substantially accommodate the large format retail and leisure floorspace identified by the Wincheap Retail Development Brief what is this? during the plan period; and*
- b) *form an effective, functional and complementary satellite centre of Canterbury City centre; and*
- c) *provide improved, attractive and convenient pedestrian links with Canterbury city centre: and*
- d) *contribute towards a package of transport improvements.*

Redevelopment of any part of the Wincheap Retail Area must not impede the successful implementation of the comprehensive retail and leisure-led redevelopment scheme and contribute financially to the overall delivery of transport and pedestrian infrastructure as indicated in the Development Brief. The location and design of new residential development identified as essential to viability of the scheme must be compatible with the primary retail and leisure function of the site.”

- 2.16 The reasoned justification for Policy TCL7 at Para 4.50 states that the Wincheap Retail Area (currently the Wincheap Industrial Estate and Riverside Retail Park) should...

“have a complementary retail function, catering for more mass market and large format retailers. There is already substantial retail floorspace on the estate and a target additional net retail floorspace of 50,000 sqm should be provided. Any redevelopment should seek to provide alternative premises for existing occupiers of the estate where possible.”

- 2.17 Para 4.51 states that...

“A planned redevelopment of the estate should incorporate a high quality design and enhanced environment, a traffic management scheme that would ensure essential improvements to traffic flow on Wincheap (including a new off-slip from the A2, and a relief route for Wincheap itself) and a mix of complementary retail, leisure, and business uses. The Council will encourage a residential element to the scheme where that helps deliver the Council’s priorities, and is located and designed in such a way that it is not incompatible with leisure uses.”

- 2.18 Para 4.52 states that....

“A master planning exercise will inform the preparation of a development brief for the Wincheap Retail Area.”

Background to Wincheap Evidence

- 2.19 Canterbury City Council (CCC) has long held plans to promote the regeneration of the Wincheap area of the City.

- 2.20 Wincheap is designated in the adopted District Local Plan 2006 (the Local Plan) as the Wincheap Regeneration Zone at Policy TC15, which states:

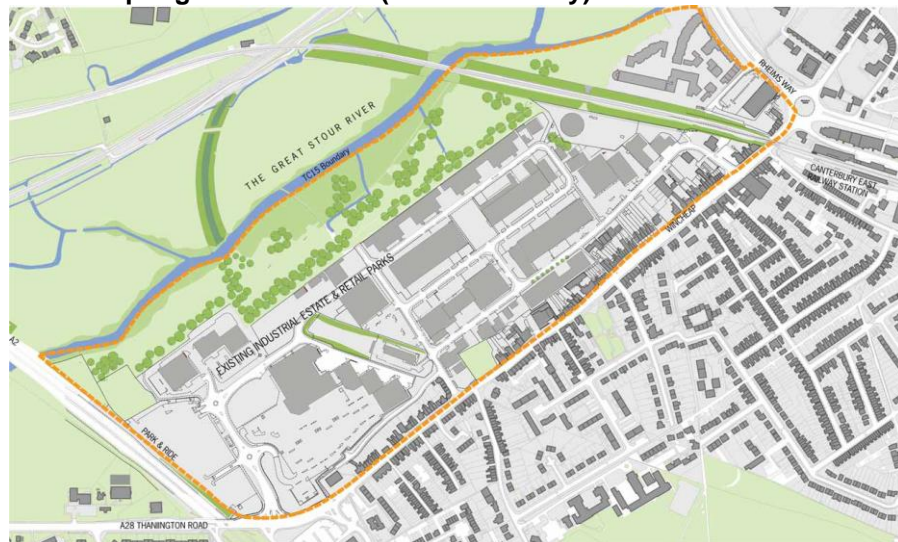
“A Regeneration Zone is designated for the redevelopment of the Wincheap area as shown on the Proposals Map (insets 1 and 2). Unless already allocated in the Proposals Map, development appropriate within the Wincheap Estate includes retail, housing, transport infrastructure, business, leisure and recreation and open space. All development

should provide a mixed use and comply with the provisions set out in the Development Brief. Development will be expected to contribute towards improving traffic management in Wincheap and environmental enhancements in the public realm.”

2.21 The area of the Regeneration Zone as identified at Policy TC15 of the adopted Local Plan is shown in the Figure 1 below. It is located south west of Canterbury City Centre, around 0.5 miles from Canterbury East railway station and 1 mile from Canterbury West railway station. It covers an area of approximately 25 acres (10 hectares).

2.22 To the north is an area of natural open space, which is bordered by the Great Stour River. The site is bordered to the south by Wincheap, which is currently the main vehicular route (A28) into the City Centre from the south west (Ashford). To the east lies the Canterbury's historic city centre and to the west, modern retail units, a Park and Ride car park and the A2 London to Dover road. Within the Regeneration Zone, Canterbury City Council is one of the principal land owners.

Figure 1: Wincheap regeneration area (TC15 boundary)



2.23 The Council and its then preferred development partner – Capital and Counties (CapCo) - prepared in partnership a draft development brief (December 2007) for public consultation. The development brief envisaged up to 1,300 residential units at the eastern end, a new retail and leisure quarter at the western end (involving a re-provision of existing space but no quantitative uplift), a new hotel, some 15,000 sqm of business, and re-provision of the park and ride.

2.24 The draft development brief was not adopted by the Local Planning Authority. However, the draft set out that proposals for the Wincheap Regeneration Zone would need to be considered in the context of the City of Canterbury as a whole.

2.25 In this regard CCC commissioned an Impact Study to assess the wider implications of the proposals on the City Centre. This was produced by DTZ in March 2008. In terms of the proposed

retail provision, the DTZ 2008 report found that..." *that there should not be a severe or protracted adverse impact upon Canterbury City Centre, provided that this new retail floorspace at Wincheap is appropriately conditioned*".

2.26 The Impact Report also carried out an initial sequential test for city centre or edge of centre sites. It concluded by finding "few sites" to take the level of retail need that existed at that time.

2.27 In January 2011 DTZ reported to CCC on retail and leisure needs in the City over the 2009 -2026 period to inform the emerging new local plan. In terms of the scenarios presented by DTZ, the study considers the most relevant is a 'constant market share approach'. Essentially this approach seeks to maintain the existing market share position such that the growth in population and expenditure support the need for additional retail floorspace over the plan period.

2.28 The 2011 DTZ report forecast retail capacity/need for some 52,000 sqm of comparison goods (net sales) by 2026 (assuming constant market share and adding in need identified for "non central uses"). The DTZ report noted (para 8.40) that....

"In this context, and given the historic city centre is more constrained than most centres, we consider that the evolving retail and leisure strategy should focus on the higher quality and specialist retail and leisure operators within the city centre, with the concept of a "satellite" centre emerging which is complementary to the city centre, catering more for bulky goods and large format retailers and leisure operators (conditioned appropriately) in an edge or out of centre location in accordance with the sequential test."

2.29 The 2011 DTZ report also reviewed potentially sequential sites. It noted (para 8.8) that...

"Canterbury city centre has few sites within the defined retail core or immediately adjacent to its which it could accommodate major new retail development."

2.30 The DTZ report continued at Para 8.34, that:

"Thus given the identified need cannot be accommodated in the retail core or city centre itself, the application of the sequential test would suggest that St George's, Canterbury West, Wincheap and Kingsmead would all need to be considered for future retail development" ...and at Para 8.35...." We recommend further detailed site specific analysis is undertaken of the four regeneration zones to compare them in terms of their suitability, availability and viability for further retail development."

2.31 Commenting on the concept of a satellite centre, the DTZ report states that (Para 9.22)...

"In impact terms we do not consider there should be a significant adverse effect on the city centre. Indeed if suitably conditioned and controlled, this could have a positive impact on the city centre relieving it of demands for all operators to be in the city centre and for relieving congestion in the city centre."

2.32 The 2008 and 2011 DTZ reports are still relevant and provide parts of the evidence base for the draft submitted Local Plan 2014 (currently being examined), and the concept of a satellite retail/leisure centre at Wincheap.

2.33 In 2015 CCC commissioned GL Hearn to update the retail needs assessment for Canterbury. GLH reported in June 2015. The 2015 (GLH) and 2011 (DTZ) are both in the public domain and before the EiP.

Canterbury Retail Assessment

2.34 The GLH retail needs assessment for Canterbury was completed in June 2015. The overall purpose of the retail study was to assess the current trading performance of retail destinations across Canterbury and establish the capacity for new retail floorspace balancing qualitative and quantitative considerations.

2.35 Canterbury is a large centre and has managed to retain and attract key retailers, thereby benefitting from the general process of polarisation into fewer larger centres. The city centre has a wide catchment area and exerts significant influence in the survey area, far beyond the City Council boundary

2.36 The 2015 GLH report was based on a new up to date telephone survey. The results of the household telephone survey reveal that Canterbury city centre is particularly popular for clothing and footwear, jewellery, personal goods, household textiles, soft furnishings and glassware.

2.37 It considers that Canterbury City is a healthily performing centre with a diverse retail offer and wide regional appeal. It (along with Maidstone) is the dominant comparison shopping destination in Kent and benefits from a strong tourism draw. However there are gaps in both the retail and leisure offer and Canterbury is not catering comprehensively to the all retail and commercial leisure needs.

2.38 Para 8.19 of the 2015 GLH report notes that:

“Given the current strong performance of Canterbury’s comparison sales densities, and acknowledging the evidence that Canterbury’s market share has tapered slightly since 2011, we would expect the city centre’s market share to reduce further over time if identified retail need is not met at suitable locations – particularly in light of recent developments in Ashford and proposed large scale retail development at Dover”

2.39 The capacity assessment identifies a comparison retail need (assuming constant market share) of some 33,800 sqm comparison (net sales) by the end of the plan period (2031).

2.40 In order to accommodate this, the report set out that the City Council consider pursuing one of two policy options, and devise a retail strategy accordingly.

1. Plan for the future of Canterbury with a reducing market share
2. Plan for Canterbury to retain market share and sustain the position in the retail hierarchy

2.41 The Council has adopted Option 2 in the Canterbury District Local Plan Publication Draft (2014) in order to protect Canterbury’s position in the retail hierarchy.

- 2.42 The 2015 GLH report identified that in pursuing Option 2, the Council will need to consider whether the city centre can accommodate the scale of the identified need through redevelopment of underutilised space, expansion of the primary shopping area, or development opportunities at edge-of-centre or well-connected out-of-centre locations with the potential to support and complement the existing provision.
- 2.43 The GLH report noted that some of the capacity could be accommodated at small in-centre sites through infill development or comprehensive redevelopment opportunities, but due to the lack of available larger sites, the Council should consider accommodating the majority of this need outside the primary shopping area. The GLH report went on to note that... *“should the Council wish to retain Canterbury’s market share and position in the retail hierarchy we would recommend that the allocation of one or more sites for major new comparison-led development outside Canterbury city centre”*.
- 2.44 At Para 8.26 the GLH report states that
“Such an allocation, if suitably conditioned and well related to the primary shopping area, could complement the role and function of the city core while meeting the shopping needs (and potentially the leisure needs) of the catchment population, and the commercial needs of potential retailers who may be attracted to Canterbury.”
- 2.45 In summary, the 2015 GLH report is based on an up to date household survey and latest retail planning assumptions. It is also based on a constant market share approach, similar to the previous DTZ Study.
- 2.46 It forecasts a lower level of comparison expenditure/floorspace than the 2011 DTZ report. Nevertheless, it still finds a substantial amount (in the order of 33,800 sqm net sales by 2031) of objectively assessed comparison retail need.

Conclusion

- 2.47 The NPPF requires that LPA’s allocate (NPPF Paragraph 23) objectively assessed need in full.
- 2.48 Both GLH (2015) and DTZ (2011) reports conclude that CCC should consider a planned allocation to accommodate this need.
- 2.49 As the Local Plan is based on meeting this assessed need for town centre uses, in accordance with the sequential approach above, issues of adverse impact should not arise. (PPG Ref: 2b-014-20140306)

3 METHODOLOGY

- 3.1 The need for main town centre uses has been assessed in the GLH retail needs assessment which considers the current situation, the demand for land for main town centre uses, forecast of future need and the type of land needed for main town centre uses as required by the PPG.
- 3.2 In this respect local planning authorities should assess and plan to meet the needs of main town centre uses in full, adopting a town centre first policy. In order to accommodate the need identified, this assessment considers the existing and potential future supply of sites.
- 3.3 This assessment starts by considering sites either within or on the edge of Canterbury and the District Centres identified in the publication draft of the Local Plan. In order to identify potential sites a number of sources have been used:
- Development Plan Search: identification of sites allocated in adopted or emerging LDPs for development;
 - Existing Permissions or Proposals: the existence of any extant permissions or current applications for retail development provided by the Council as part of their annual monitoring exercise; and
 - On the Ground Site Survey and discussions with Officers: the presence of any other sites or buildings with potential for development, such as cleared sites, undeveloped sites or redundant buildings, based on visits to and discussions around the above centres.

Site Assessment

- 3.4 Where sites have been identified, an assessment has been made of them, in order to establish their suitability and availability to accommodate some or all of the retail need. A site proforma has been prepared to assess the sites, which takes into account the following:
- Site Size: the overall size of the site to be considered;
 - Location: to establish whether the site is within or on the edge of any of the centres and if edge of centre the scope to foster links with the centre;
 - Existing Uses: to establish what current uses are at each site, whether the sites are identified as suitable for retention in evidence based documents such as the Employment Land Review or the SHLAA;
 - Other Constraints: to establish whether there are other constraints to potential development, for example, conservation area or listed building status, tree preservation orders, topography, etc;
 - Policy Issues: to consider development plan policies, in particular site specific policies, relevant to the sites identified and other constraints to a retail development for the site;
 - Servicing/Accessibility Considerations: considering if sites can be satisfactorily serviced and accessed by vehicles, with consideration given to potential impact on the local highway network and safety;
 - Planning Permissions and Other Proposals: whether there are any extant permissions for development on the sites identified, the likelihood and timescale of permissions being implemented, and details of any other proposals; and

- Commercial Viability: to consider whether the site is likely to be commercially attractive to retail and leisure operators.
- 3.5 It should be noted that site ownership/land assembly requirements have not been considered for the smaller in and edge of centre sites, as it would be expected that sites within multiple ownership, or other land assembly issues could potentially be overcome during the plan period.
- 3.6 Once the above considerations have been taken into account, an assessment is made as to the overall suitability of the site for retailing purposes. If it is considered suitable, then an assessment is made given the site's location and its constraints as to whether it is more suited for a standalone retail development or a potential extension to an existing unit(s).
- 3.7 In terms of the potential for sites to deliver retail floorspace, the key assumptions are:
- Town centre sites – car parking provided elsewhere
 - Edge of centre sites – car parking provided on site
 - The gross to net ratio is 70%, reflecting town centre proposals
 - Commercial assumptions – whether there is scope for mezzanine, if so 50% coverage at first floor
- 3.8 The findings of the sequential assessment for the individual sites are identified in the following section:

4 SEQUENTIAL SITE ASSESSMENT

4.1 This section provides an overview of the sequential site assessment. The sites identified have been categorised into in, edge and out of centre sites in respect to the guidance in the NPPF/PPG for the identified centres at Canterbury, Herne Bay and Whitstable. The sites are identified in Appendices A and D and in the table below:

Table 1: Sequential site locations

Centre/Location	Canterbury	Herne Bay	Whitstable
In Centre			
White Horse Lane	x		
Edge of Centre			
Car Park Adjacent to Canterbury West Station	x		
Former Peugeot Garage	x		
Watling Street Car Park	x		
Gorrell Tank Car Park			x
Herne Bay Bus Station		x	
Herne Bay Central Development Area		x	

4.2 The full assessments of the in and edge of centre sites are identified in Appendix A and this considers in more the detail the criteria established in section 3.

In Centre Sites

4.3 The Annex of the NPPF identifies that edge of centre sites for retail purposes, is a location that is well connected and up to 300 metres of the primary shopping area. Therefore an in centre site is a site within the primary shopping area.

4.4 Accordingly, there is only one in centre site as summarised below:

White Horse Lane, Canterbury

4.5 The site lies within the primary shopping area and therefore would be a suitable location for retail. Notwithstanding this the site is irregular in shape and contains a number of existing uses and it principally lies to the rear of 39-40 High Street and adjacent to the rear of 46-47 High Street. Therefore it may offer an opportunity for an extension to either unit's retail floorspace, although this may only be a theoretical proposal as it would provide a 'L' shaped unit, not particularly suitable for retail operators.

4.6 As the site has no other opportunity for a retail frontage into the main shopping area, the remainder of the site is probably best suited for residential and community uses as envisaged in emerging Policy TCL10.

- 4.7 Nevertheless a small extension to the shops fronting High Street, as shown in Appendix A, could potentially deliver an additional floorspace of around 400sqm, of which 280 sqm is assumed to be net trading area.

Edge of Centre Sites

Car Park Adjacent to Canterbury West Station

- 4.8 The site currently contains a large amount of trees on its frontage. The trees are not covered by TPO's but would require Conservation Area Consent to lop or remove.
- 4.9 This site is on the limits of what could be considered edge of centre from the PSA, but is acknowledged to be in a sustainable location adjacent to Canterbury West station. It is also noted that the Employment Land Review identifies the site potentially suitable for offices (which is another main town centre use).
- 4.10 Subject to the acceptability of the loss of the car parking facilities for the station, this site could be suitable for a mixed use development, which could accommodate some retail, subject to addressing the relevant tests.
- 4.11 Therefore a proposal including some retail and office/commercial on the ground floor with some residential accommodation above could be suitable for the site. If this were to be developed, some on site car parking for the uses would be expected to be provided. A potential ground floor commercial footplate for the development could extend to around 1,400 sqm gross floorspace.
- 4.12 If it is assumed that half of a ground floor footprint could be occupied retail uses, this site could potentially deliver a net floorspace of around 500sqm. In this location it may however be more suitable for occupation by convenience goods rather comparison.

Peugeot Garage, Rhodaus Town

- 4.13 This is an edge of centre site, but currently benefits from planning permission for the erection of a student accommodation development comprising 539 bedrooms, ancillary gymnasium, administration/catering/welfare facilities, refuse and recycling facilities, cycle parking, car parking and landscaped open space.
- 4.14 As the planning permission has been implemented, the site is not available.

Watling Street Car Park

- 4.15 The Watling Street car park is irregular in shape and is designated as a scheduled ancient monument (Roman Remains) and given that this monument covers the entire site, it is unlikely that the protection of this structure could be achieved with a retail development. In addition the land to

the south of the site also contains the City Walls and several other heritage structures which prevent the expansion of the site to the south. Furthermore any potential development will have to consider the potential impact on these monuments.

- 4.16 The car park is well used and within the Transport Plan is noted to be at 100% capacity with 10 cars circling the car park looking for spaces. The redevelopment of the car park would have to demonstrate that the loss of the busiest car park in the Transport Plan would not have an unacceptable impact on car parking across the City.
- 4.17 Although the site is within 30m of the primary shopping frontage, it is located to the rear of the main shopping centre, directly opposite the shopping centre's service entrance. The rear of the shopping centre also contains a number of flats which overlook the site. The site has no visual connection with the remainder of the shops in the centre and there is no opportunity to improve the connections to improve this connectivity.
- 4.18 Until the issues with the scheduled ancient monument, car parking and lack of connectivity with the remainder of the shops is overcome, this site is not considered a suitable site for a retail development as part of this sequential assessment.

Herne Bay Bus Station

- 4.19 This is an edge of centre site, which is adjacent to the main shopping area and is immediately adjoining the shops on High Street. As such it would be considered a logical retail extension to the shopping facilities at Herne Bay. Notwithstanding this, it is noted that the Employment Land Review considers that this site is considered suitable for offices (which is also an acceptable main town centre use).
- 4.20 The site is still in use as a bus depot. Stagecoach is currently implementing its planning permission for a new depot on Eddington Lane near to the Herne Bay train station; it is expected that its operation will move across by summer/autumn 2016. It is anticipated that this site will soon be available; however the site is in a flood zone 2, which led to Sainsbury's withdrawing a planning application in 2009.
- 4.21 Assuming that the flooding issues could be overcome, a standalone or small run of retail units may be a suitable option for the site, subject to market demand. In this location some car parking and a servicing area would be required to cater for the needs of modern retailers and an indicative layout is presented in Appendix A.
- 4.22 It is anticipated that a unit(s) could be delivered providing around 2,100 sqm gross floorspace. Once this is reduced down to a net figure, this would provide a trading floorspace of around 1,500 sqm. In

order to provide a robust assessment of the site, the potential for mezzanines should be included and working on the basis of a 50% coverage, this could provide an additional 750sqm of retail floorspace at the site.

Herne Bay Central Development Area

- 4.23 The Central Development Area (CDA) is actually in an edge of centre location for retail purposes, but is well related to the main retail facilities fronting High Street. It is currently in use as a car park. The Council have granted planning permission for an Aldi on the King's Road Car Park with construction expected to start imminently and as such this western part of the site is not available.
- 4.24 Any further loss of car parking for Herne Bay needs to be carefully considered, especially as parking is nearly at capacity on Saturdays. This is critical if car parking were to be replaced with further retail, which in turn would be likely to create a further demand for car parking.
- 4.25 Until some replacement or additional car parking facilities can be found for Saturday, no further development of the car parks would be anticipated.
- 4.26 Assuming this could be overcome during the plan period, then the site could accommodate a number of options. There would be a need to retain some car parking, suitable access to the rear of the retail units fronting High Street to the north and the pedestrian access through to William Street to the east of the car park.
- 4.27 The site is identified within the adopted Herne Bay Masterplan (2011) which recognises an opportunity to develop the northern part of the carpark with three storeys of accommodation comprising A3 and A1 uses on the ground floor with two storeys of residential accommodation above. The unit to the north could provide 2,700 sqm (gross) or approximately 1,900sqm (net) of retail floorspace.
- 4.28 To the south a six storey unit is envisaged which will accommodate two storeys of A1 retail use above this will be two storeys of healthcare accommodation and two storeys of hotel accommodation. The unit to the south could provide 1,850 sqm (gross) or approximately 1,300 sqm of retail floorspace.
- 4.29 In total this location could accommodate a mixed use development with an A1 retail floorspace of around 4,550 sqm (gross) or 3,200sqm (net). This is a robust assessment of the total quantum of floorspace as it is likely that there would be some convenience floorspace provided within the two units identified.

Summary

- 4.30 As has been identified in the GLH Study, some of the capacity identified could be accommodated at a range of small in-centre (and edge of centre) sites, but it was acknowledged that there would be a lack of available sites.
- 4.31 The sites which have been identified within and on the edge of centres to accommodate some of the identified need are summarised below:

Table 2: In and edge of centre sites with retail development potential

Site	Capacity (sqm, net)
In Centre	
White Horse Lane	280
Edge of Centre	
Car park Adjacent to Canterbury West Station	500
Herne Bay Bus Station	2,250
Herne Bay CDA	3,200
Total	6,230

Planning Permissions

- 4.32 Canterbury City Council has provided details of A1 retail planning permissions approved over the previous three years. This identifies that there has been a cumulative additional retail floorspace approved of 7,713sqm (gross), which would equate to around 5,399 sqm net floorspace in the District as a whole. This excludes any A1 convenience floorspace proposals. Over the same period, there has been retail floorspace lost. This totals 6,826sqm gross, or around 4,778sqm net and again removes any identified A1 convenience floorspace. Over that period 34 sqm (24 sqm net) of retail floorspace previously approved expired.
- 4.33 Therefore, current retail planning permissions for comparison goods in Canterbury district could potentially add an additional 597 sqm (net).
- 4.34 Therefore overall existing approved (597sqm) and potentially sequential sites (6,230 sqm) totals 6,827 sqm. This therefore leaves around 27,000 sqm of floorspace (33,800 – 6,827= 26,973sqm) which still needs to be accommodated over the plan period.

Out of Centre Sites

- 4.35 In accordance with the Guidance, this assessment goes on to consider what are the next sequentially preferable sites to accommodate the additional main town centre uses which cannot be accommodated on in or edge of centre sites. This section considers whether there are any out of centre sites which could accommodate the needs currently identified for the Wincheap Retail Area as identified in TLC7 of the Canterbury District Local Plan Publication Draft (2014).

4.36 The potential out of centre sites considered are identified below:

Table 3: Potential out of centre sites

Out of Centre	Canterbury	Whitstable
Gorrell Tank Car Park		x
Land to the north of Canterbury West Station	x	
Roger Britton Carpets	X	
Former Coach Park and Serco Site	X	

4.37 The full assessments of the out of centre sites are identified in Appendix B and this considers in more the detail the criteria established in section 3.

Gorrell Tank Car Park

4.38 Although the site is 400m from the PSA, it is still located within the town centre boundary. The site benefits from a good frontage to Harbour Street and good access from Westgate Terrace, where the current car park use gains its access. It is however noted that part of the car park has been closed due to issues with the tank below.

4.39 Despite these positive aspects, the site is within flood zone 3 and the tank protects homes in the area from flooding. As such any development would need to consider the exception test for development, unless developed for water compatible or water based uses. Retail is not one of those uses.

4.40 Car parking in Whitstable is clearly an issue and is close to capacity at weekends, therefore in addition to the exception test, the loss of car parking would need to be carefully considered.

4.41 Until these matters have been resolved, and it is doubtful whether the flooding issue could be addressed, then this site is not suitable for retail purposes as part of this sequential assessment.

Land North of Canterbury West Station

4.42 This is a greenfield site to the east of Canterbury West Station which is currently grassed. It is an out of centre site, and does not have any obvious links with the remainder of the shopping facilities in Canterbury. Notwithstanding this the site is a sustainable location.

4.43 As the site is in an out of centre location with no obvious connections to the centre and is allocated in the draft Local Plan (2014) for housing, it is not considered a suitable sequential site for this assessment.

Roger Britton Carpets

- 4.44 Although this site is currently identified in the emerging local plan as suitable for housing and leisure, it currently benefits from planning permission for the redevelopment for retail and residential purposes. This includes the reduction in retail floorspace of 450 sqm (gross).
- 4.45 As this site benefits from planning permission, including a reduced level of retail floorspace, it is not considered available for further retail purposes.

Kingsmead

- 4.46 The site is in an out of centre location, but is included in emerging policy TCL10 which suggests that retail, leisure, business and residential uses would be appropriate in principle.
- 4.47 In May 2015 Bouygues Development was chosen as Canterbury City Council's preferred Development Partner. An initial round of consultation was undertaken in the final quarter of 2015 and this identified an initial quantum of development including:
- A new state-of-the-art cinema with 8 to 10 screens
 - A wide range of commercial units, including restaurants, shops, bars and other leisure uses
 - A cultural square providing an area to host civic events, markets, outdoor theatre productions and seasonal activities such as ice skating
 - 500 purpose built and managed student living units
 - A mixture of 65 family homes and apartments
 - 300 car parking spaces in an undercroft car park
 - Additional parking for all family homes and apartments
 - Opening up public access to the River Stour through a new riverside walkway

- 4.48 It is noted that there was no quantum of A1 retail floorspace for the proposal, but given that there is a range of development proposed in a mixed use proposal for the site, the proposed level of floorspace is anticipated to be relatively small. In any case it would need to address the relevant tests for out of centre proposals.

- 4.49 In any case it would need to address the relevant tests for out of centre proposals, but in order to provide a robust assessment the maximum cap of 2,500sqm (gross) identified in the Development Brief would indicate a potential net floorspace of 1,750sqm.

Summary

- 4.50 The assessment of out of centre sites above identifies that on the coach park and Serco site has the potential to provide some comparison goods floorspace, which, subject to meeting the tests for out of centre proposals, could provide 1,750 sqm of net retail floorspace.

4.51 This still leaves in excess of 25,000 sqm (27,000 sqm -1,750sqm) of comparison goods floorspace which still needs to be accommodated over the plan period. The potential for the Wincheap area of the city to accommodate this is identified further below.

5 SITE CAPACITY STUDY

5.1 GL Hearn has worked with BDP to identify working assumptions for the site capacity testing. BDP's report is attached at Appendix C.

5.2 Key assumptions for the site capacity study are:

- Draft Policy TCL7 targets an additional net retail floorspace of 50,000 sqm to be provided and that development should... *“seek to provide alternative premises for existing occupiers of the estate where possible”*.
- We have tested accommodating both forecast needs as well as re-providing existing space. We have excluded the existing retail uses on Wincheap Retail Park, Riverside Retail Park and Morrisons (assumed to remain in situ) for the purposes of the site capacity study.
- We have assumed that the existing Park and Ride site is retained for Park and Ride expansion.
- The identified location for a potential “satellite centre” is the land largely in CCC ownership comprising the Wincheap Industrial estate as illustrated at Figure 1. This comprises a site area of approximately 9 hectares, excluding the gasholder site.
- According to the DTZ 2008 report, the identified area comprises existing retail and service uses of 27,763 sqm (GEA).
- The identified retail need post the GLH sequential assessment 25,000 sqm (comparison) in NET SALES. This equates to 41,667 sqm in GEA (assuming 60% net: gross which reflects large format retail uses as would be complementary to the city centre).
- If the existing retail space were to be provided on site, then the total retail floorspace requirement would be 69,430 sqm GEA (i.e. the GLH forecast need after sequential assessment, plus the existing space to be replaced).
- A maximum of 75% of the site area is built out for retail, with a minimum 25% for roads, car parking and servicing.
- A new main road/route is provided to the rear of new retail units to relieve traffic flows on Wincheap.
- Commercial and design assumptions are ground floor plus 50% coverage at first floor – reflecting large format retail requirements.
- Car parking provision of 1 space per 30 sqm GEA.
- A simple “L” shaped run of retail large format units is envisaged (in keeping with the complementary role/nature of the proposed satellite/ancillary centre to the city centre), wrapped around car parking on the north side.

5.3 Table 4 summarises the BDP report's findings which assesses 4 site capacity options.

Table 4: Site capacity scenarios

	Retail GEA sqm	Retail Net sales sqm	Parking spaces
Scenario 1 – all surface car parking	45,400	27,240	1513
Scenario 2 – 1 deck/2 level car park	62,862	37,717	2095
Scenario 3 – 2 deck/3level car park	72,106	43,263	2404
Scenario 4 – 3 deck/4 level car park	77,829	46,697	2594

- 5.4 Scenario 1 shows an all surface car parking scheme. We consider that this would be the most desirable commercially. This scenario would accommodate a net addition of 45,400 sqm GEA (or 27,240 sqm net sales area). This compares with 41,667 sqm GEA (or 25,000 sqm net sales) of the need identified.
- 5.5 Thus Scenario 1 exceeds the identified additional retail need. It however falls short if the existing space is also accounted for and re-provided in full.
- 5.6 Scenarios 2, 3 and 4 show how additional retail floorspace can potentially be accommodated by providing car parking in a decked multi-storey car park. We consider these maybe less desirable commercially, but should not be ruled out given market conditions change over time.
- 5.7 Scenario 3 and 4 exceeds the total net additional floorspace of 69,430 GEA sqm, i.e. meeting all identified need and re-providing existing space in full.

6 CONCLUSIONS

- 6.1 GL Hearn (GLH) was commissioned in November 2015 by Canterbury City Council (CCC) to prepare a report to assess the sequential opportunities to accommodate some or all of the retail needs identified in the GLH Retail and Leisure Study for Canterbury which was completed in June 2015.
- 6.2 The June 2015 GLH report identified a comparison retail need (assuming constant market share) of some 33,800 sqm comparison (net sales) by the end of the plan period (2031).
- 6.3 The purpose of the sequential assessment is to consider the scope for in and edge of centre sites to accommodate the identified need. This assessment also considers whether there are any out of centre sites which could accommodate the needs currently identified for the Wincheap Retail Area as identified in TLC7 of the Canterbury District Local Plan Publication Draft (2014).
- 6.4 The publication draft of the Canterbury District Local Plan identifies a hierarchy of centres which is considered to be resilient to future economic changes. This defines Canterbury City centre as a sub-regional centre for retail. In addition to Canterbury, the Local Plan defines district centres at Herne Bay and Whitstable, which have a complementary role as part of the established retail hierarchy, serving the local population. Thereafter Local Neighbourhood Centres contain a range of small shops of a local nature, such as a small supermarket, newsagent, sub-post office and pharmacy and potentially other services such a hot-food takeaway and launderette.
- 6.5 This hierarchy has been assessed for suitable sequential sites within and on the edge of centres to accommodate some of the identified need. The conclusions of this assessment are summarised below:

Table 5: In and edge of centre sites with retail development potential

Site	Capacity (sqm, net)
In Centre	
White Horse Lane	280
Edge of Centre	
Car park Adjacent to Canterbury West Station	500
Herne Bay Bus Station	2,250
Herne Bay CDA	3,200
Total	6,230

- 6.6 Canterbury City Council has provided details of A1 retail planning permissions approved over the previous three years. There are currently retail planning permissions for comparison goods in Canterbury district could potentially add an additional 597 sqm (net) of retail floorspace.

- 6.7 Therefore overall existing approved (597sqm) and potentially sequential sites (6,230 sqm) totals 6,827 sqm. This therefore leaves around 27,000 sqm of floorspace ($33,800 - 6,827 = 26,973$ sqm) which still needs to be accommodated over the plan period.
- 6.8 In accordance with the Guidance, this assessment goes on to consider what are the next sequentially preferable sites to accommodate the additional main town centre uses which cannot be accommodated on in or edge of centre sites.
- 6.9 The assessment of out of centre sites above identifies that on the coach park and Serco site has the potential to provide some comparison goods floorspace, which, subject to meeting the tests for out of centre proposals, could provide 1,750 sqm of net retail floorspace.
- 6.10 This still leaves in excess of 25,000 sqm (net sales) of comparison goods floorspace which needs to be accommodated over the plan period.
- 6.11 In order to maintain Canterbury's current role and competitive position in the retail hierarchy it follows that the Council should seek to meet this need and the Local Plan is seeking to address this through Policy TCL7 of the draft submitted Local Plan 2014 which relates to the "Wincheap Retail Area".
- 6.12 With our sub-consultants BDP, we have considered four site capacity scenarios for the Wincheap Industrial Estate area.
- 6.13 Scenario 1 is based around surface car parking. We consider that this would be the most desirable commercially at the current time, although scenarios 2, 3, and 4 which embrace decked car parking should not be ruled out.
- 6.14 Scenario 1 could accommodate in the order of 27,240 sqm net sales, which is 2,240 sqm net (3,733 sqm GEA) over the comparison retail need identified by GLH (2015 Report) over the full plan period, after the sequential exercise (25,000 sqm) is accounted for.
- 6.15 As the sequential assessment found capacity for 6,230 sqm, then Scenario 1 could absorb the surplus need that could not be accommodated in sequentially preferable sites. As such a satellite centre at Wincheap would be an appropriate planning policy response, and in keeping with NPPF policy which requires needs to be met in full.
- 6.16 Scenario 1 would not however have the capacity to accommodate the identified need and all the existing retail space if the latter were to be fully re-provided on site.
- 6.17 There may be the potential to increase the Scenario 1 floorspace capacity further through more detailed design work and/or expansion of the site area (for example to include the gasholder site

and/or part of the Park and Ride site). In addition a new scheme may well be phased allowing some existing uses to remain in place or to be accommodated in the new development.

- 6.18 The submitted supporting text (para 4.50) to Policy TCL7 as drafted is that “where possible” existing space should be provided. We consider that “where possible” provides some flexibility in the policy.
- 6.19 Our site capacity work leaves the Wincheap and Riverside retail parks in situ. This is relatively high value and modern retail space, which we would not expect to be quickly redeveloped (NOTE: the Cap Co proposals included the Riverside retail park as this space was owned by them).
- 6.20 The existing retail space on the Wincheap Industrial estate (that would be redeveloped – potentially in phases – to facilitate a new satellite or ancillary retail centre to the city centre) - is generally of a lower quality and less intensively used. However, it accommodates a number of “quasi” retail uses, such as warehousing and storage (although we understand from the DTZ 2008 report are “A” class uses).
- 6.21 It is possible there is potential to rationalise existing uses/premises, and/or accommodate them in the new satellite/ancillary development, given its complementary role to the city centre. However, CCC will need to consider where the existing retail and service uses could be accommodated over time, given their role in the local retail economy and the jobs they support.
- 6.22 Canterbury CC may therefore wish to consider amending draft Policy TCL7. For example, to clarify that the local plan policy priority is the comprehensive (albeit potentially phased) regeneration of Wincheap for a new satellite/ancillary retail centre, but that development proposals would need to identify suitable relocation opportunities.

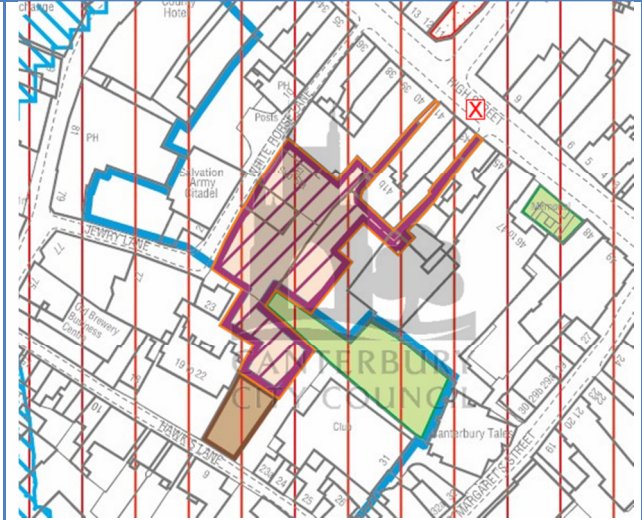
Appendices

APPENDIX A: Potential in and edge of centre sites

Site Appraisal

Site Description:	Ref:	Site Size:	Estimated Capacity:
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White Horse Lane, Canterbury	1	0.19ha	280sqm
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Availability:	Current Use:	Surface car parking and industrial / retail units	Surrounding Uses/Character:	Mix of retail and leisure uses. Buildings are largely traditional in character.		
Existing Structures:	The existing buildings include the existing retail, industrial buildings and an electrical sub station					
Protected Areas:	TPO:	N/A	Heritage:	None on the site itself. The building to the north of the site and some to the south are listed.	Conservation Area:	Lies within the Canterbury City Conservation Area
Suitability:	Site Access:	The site has no direct access to the main shopping streets. Access to the site could be taken from White Horse Lane which is a narrow single track road.	Flooding:	The site is not liable to flooding	Distance to Primary Shopping Area:	Site lies within the primary shopping area.
Planning History:	CA/00/00854 Change of use of building to restaurant (Class A3) with associated external alternations – this is currently operating as the Foundry Brew Pub.					
Relevant Policy:	Site is identified in Policy TCL10 of the draft local plan as allocated for mixed use development with retail, residential and community uses indicated as appropriate as part of any development.					
Evidence Base:	The site does not feature in the Employment Land Review.					
Potential Developable Area:	<p>The site is irregular in shape and contains a number of existing uses. It principally lies to the rear of the no 39-40 High Street and adjacent to the rear of 46-47 High Street and therefore may offer an opportunity for some extension to either retail floorspace, subject to addressing issues with the listed building and relocating the sub-station. This may only be a theoretical proposal as it would provide an "L" shaped unit, which may not be suitable to cater for modern retail requirements.</p> <p>If this were considered suitable in retail and design terms, a small extension to the unit could potentially deliver an additional floorspace of around 400 sqm (gross), or a net floorspace of around 280sqm.</p>					



Summary

The site lies within the primary shopping area and therefore would be a suitable location for retail. Notwithstanding this, the site is irregular in shape and contains a number of existing buildings and structures and it principally lies to the rear of 39-40 High Street and adjacent to the rear of 46-47 High Street. It therefore may offer an opportunity for an extension to either retail floorspace, although this may only be a theoretical proposal it would provide an "L" shaped unit which would be unlikely to be suitable for the needs of modern retailers.

As the site has no other opportunity for a retail frontage into the main shopping area, the remainder of the site is probably best suited for residential and community uses as envisaged in emerging Policy TCL10.

Nevertheless a small extension to the shops fronting High Street could potentially deliver an additional floorspace of around 280sqm, which would assumed to be all net trading area.

Site Appraisal

Site Description:	Ref:	Site Size:	Estimated Capacity:
Car Park adjacent to Canterbury West Station, Canterbury	2	0.4ha	500sqm



Availability:	Current Use:	The site is currently in use as a surface car park	Surrounding Uses/Character:	The surrounding uses are largely residential with the railway line and station falling to the north of the site.		
Existing Structures:	N/A					
Protected Areas:	TPO:	No	Heritage:	N/A	Conservation Area:	Lies within Canterbury (West Station) Conservation Area.
Suitability:	Site Access:	Access to the site would be taken from Station Road West this current accommodates traffic to the station and to the existing car park and as such no issues would be expected.	Flooding:	N/A	Distance to Primary Shopping Area:	300m Measured using the mapping tool within the local plan
Planning History:	No planning history found					
Relevant Policy:	The site is included in the draft local plan allocated under policy EMP1 as employment land.					
Evidence Base:	The site is included in the Employment Land review (EL3) with the potential use being Office (A2, B1a)					
Potential Developable Area:	<p>The trees on the frontage of the site would need to be carefully considered as well as the loss of the car parking facilities for the station, but this small site could be suitable for a mixed use development, which could potentially accommodate some retail, subject to addressing the relevant tests.</p> <p>Therefore a proposal including some retail and office/commercial on the ground floor with some residential accommodate above, could be suitable for the site. If this were to be developed some on site car parking for the uses would be expected to be provided. A potential ground floor commercial footplate for the site could extend to around 1,400 sqm gross floorspace.</p> <p>If half of this was to be occupied by occupied by retail uses, albeit it may be more suitable for occupation by convenience goods rather comparison, and a gross to net ratio of 70% were to be used as a guide, this site could potentially deliver around 500sqm.</p>					



Summary

The site currently contains a large amount of trees on its frontage. The trees are not covered by TPO's but would require Conservation Area Consent to lop or remove.

This site is on the limits of what could be considered edge of centre from the PSA, but is acknowledged to be in a sustainable location adjacent to the station. It is also noted that the Employment Land Review identifies the site potentially suitable for offices (which is another main town centre use)

Subject to the acceptability of the loss of the car parking facilities for the station, this site could be suitable for a mixed use development, which could accommodate some retail, subject to addressing the relevant tests.

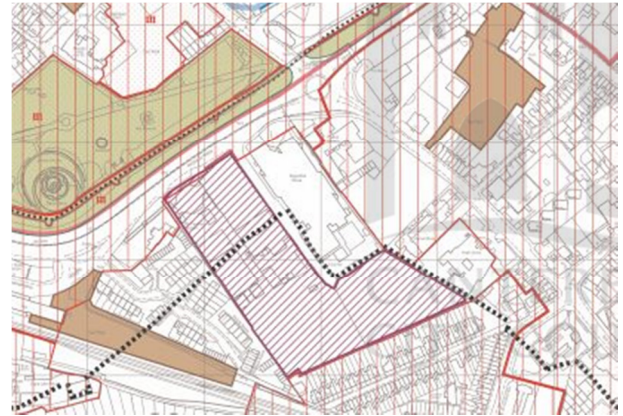
Therefore a proposal including some retail and office/commercial on the ground floor with some residential accommodation above, could be suitable for the site. If this were to be developed, some on site car parking for the uses would be expected to be provided. A potential ground floor commercial footplate for the development could extend to around 1,400 sqm gross floorspace.

If half of this was to be occupied by retail uses, albeit it may be more suitable for occupation by convenience goods rather comparison, and a gross to net ratio of 70% were to be used as a guide, this site could potentially deliver around 500sqm.

Site Appraisal

Site Description:	Ref:	Site Size:	Estimated Capacity:
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Former Peugeot Garage, Rhodaus Town	3	1.986ha	n/a
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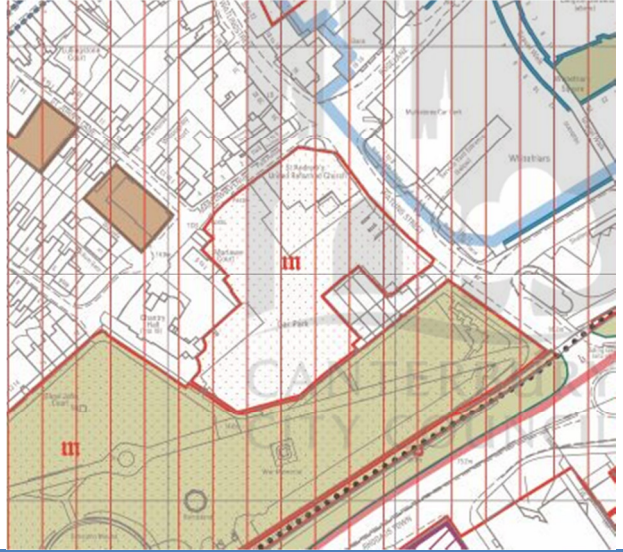


Availability:	Current Use:	The site is a former Peugeot Garage which has been demolished	Surrounding Uses/Character:	The surrounding uses are largely industrial in nature with residential properties lining the sites border to the south east.		
Existing Structures:	Site has been cleared and is readied for development.					
Protected Areas:	TPO:	N/A	Heritage:	Part of the site lies within an Area of Archaeological Importance.	Conservation Area:	On the edge of the Canterbury City Conservation Area.
Suitability:	Site Access:	Access to the site could be taken from the A28 the main route running east-west to the south of the city centre.	Flooding:	The site is not liable to flooding	Distance to Primary Shopping Area:	150m Measured using the mapping tool within the local plan
Planning History:	This site was granted planning permission in August 2015 (Ref CA//15/00602) for the erection of student accommodation development comprising 539 bedrooms, ancillary gymnasium, administration/catering/welfare facilities, refuse and recycling facilities, cycle parking, car parking and landscaped open space.					
Relevant Policy:	Site is identified in Policy TCL10 of the draft local plan as allocated for mixed use development with student housing, office/commercial, leisure and education, indicated as appropriate as part of the development.					
Potential Developable Area:	The site currently benefits from planning permission for the erection of student accommodation development comprising 539 bedrooms, ancillary gymnasium, administration/catering/welfare facilities, refuse and recycling facilities, cycle parking, car parking and landscaped open space. This planning permission has been implemented and as such the site is not available.					
Evidence Base:	The site is listed within the SHLAA for ' Housing as part of mixed use development – retail, commercial, assembly and leisure'					

Summary

The site is currently being developed in associated with the university and as such cannot be considered as an available site for a retail development.

Site Appraisal

Site Description:	Ref:	Site Size:	Estimated Capacity:			
Watling Street Car Park, Canterbury	4	0.75ha				
						
Availability:	Current Use:	Surface car parking	Surrounding Uses/Character:	Mix of retail and leisure uses. The building to the north is a modern church. Land to the south east and west in use as public open space.		
Existing Structures:	N/A					
Protected Areas:	TPO:	N/A	Heritage:	The site is identified within the Local Plan as a Scheduled Ancient Monument (Roman Remains)	Conservation Area:	Lies within the Canterbury City Conservation Area
Suitability:	Site Access:	Access to the site is currently taken from Watling Street which runs to the rear of the main shopping centre. Watling Street also provides access to the main bus station	Flooding:	The site is not liable to flooding	Distance to Primary Shopping Area:	The site is approximately 30m from the primary shopping area.
Planning History:	CA//84/01049 CA//81/00961					
Relevant Policy:	The site is identified as a Scheduled Ancient Monument (Roman Remains). Policy HE11 of the Emerging Local Plan states that on sites where there is an archaeological heritage asset an appropriate desk based assessment of the asset should be undertaken and included in support of any planning application.					
Evidence Base:	The site does not feature in the Employment Land Review or the SHLAA. The Transport Plan identifies that the car park was at 100% capacity with 10 cars circling the car park looking for spaces.					
Potential Developable Area:	The site is designated as a Scheduled Ancient Monument and development would have to ensure that this is protected. There are also a number of heritage structures to the south of the site. The site is irregular in shape and contains a well-used existing car park. At the time of the publication of the Transport Plan was observed to be at 100% capacity with 10 cars circling the car park looking for spaces. As such given the shape and its use and the heritage constraints within and surrounding the site, it is not considered suitable for a retail development.					

Summary

The car park is irregular in shape and is designated as a scheduled ancient monument and given that this monument covers the entire site, it is unlikely that the protection of this structure could be achieved with a retail development. In addition the land to the south of the site also contains the City Walls and several other heritage structures which prevents the expansion of the site to the south. Furthermore any potential development will have to consider the potential impact on these monuments.

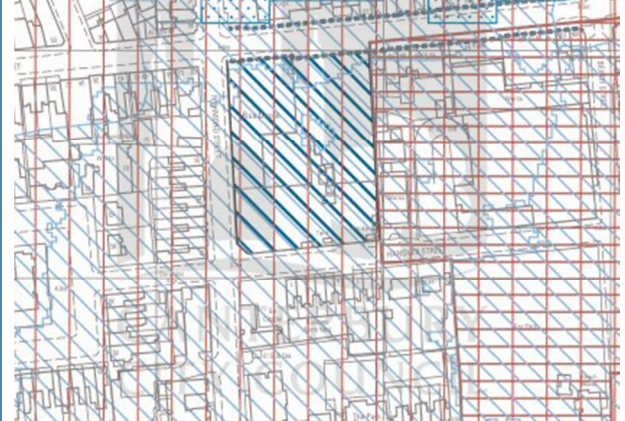
The car park is well used and within the Transport Plan is noted to be at 100% capacity with 10 cars circling the car park looking for spaces. The redevelopment of the car park would have to demonstrate that the loss of the busiest car park in the Transport Plan would not have an unacceptable impact on car parking across the City.

Although the site is within 30m of the primary shopping frontage, it is located to the rear of the main shopping centre, directly opposite the shopping centre's service entrance. The rear of the shopping centre also contains a number of flats which overlook the site. The site has no visual connection with the remainder of the shops in the centre and there is no opportunity to improve the connections to improve this connectivity

Until the issues with the scheduled ancient monument, car parking and lack of connectivity with the remainder of the shops is overcome, this site is not considered a suitable site for a retail development as part of this sequential assessment.

Site Appraisal

Site Description:	Ref:	Site Size:	Estimated Capacity:
Herne Bay, Bus Station	5	0.55ha	1,500sqm ground, 750 mezzanine



Availability:	Current Use:	Currently in use as a bus station / depot	Surrounding Uses/Character:	The surrounding uses include a retail frontage, residential properties and a Morrisons Superstore.		
Existing Structures:	The bus depot buildings					
Protected Areas:	TPO:	N/A	Heritage:	N/A	Conservation Area:	Lies within the Herne Bay Conservation Area
Suitability:	Site Access:	Access to the site would be as existing from Richmond Street. Good site frontage to High Street	Flooding:	Part of the site lies within flood zone 2.	Distance to Primary Shopping Area:	287m Measured using the mapping tool within the local plan
Planning History:	CA/08/01333 (withdrawn): Demolition of bus depot and erection of retail (Class A1) supermarket with 8 flats above and associated facilities.					
Relevant Policy:	The site is included in the Herne Bay Area Action Plan as a key site for mixed use development.					
Evidence Base:	The site is included in the Employment Land review (EL3) with the potential use being Office (A2, B1a)					
Potential Developable Area:	<p>The site lies within close proximity to residential properties to the west and south and these would need to be taken into consideration in any development proposals. It would generally be expected that any retail units would be in a similar location to the existing bus station structures.</p> <p>In this respect a standalone or small run of retail units may be a suitable option for the site, subject to market demand. With this option some car parking and a servicing area would be required to cater for the needs of a modern retailer.</p> <p>In the absence of a detailed masterplan for the site, using the existing buildings as a general guide as to a potential footprint, this could potentially accommodate a unit(s) of 2,100 sqm gross floorspace. Once this is reduced down to a net figure, this could provide a floorspace of around 1,500 sqm. In order to provide a robust assessment of the site, the potential for mezzanines should be included and working on the basis of a 50% coverage, this could provide an additional 750sqm of retail floorspace at the site.</p>					



Summary

This is an edge of centre site, which is adjacent to the main shopping area and is immediately adjoining the shops on High Street. As such it would be considered a logical retail extension to the shopping facilities at Herne Bay. Notwithstanding this it is noted that the employment land review considers that this site suitable for offices (which is also an acceptable main town centre use).

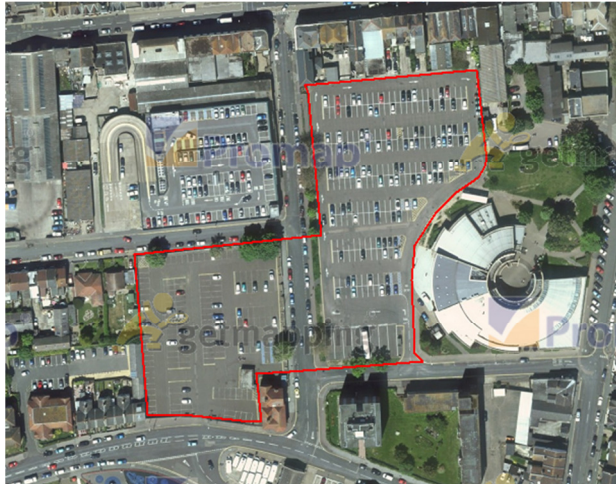
The site is still in use as a bus depot. Stagecoach is currently implementing its planning permission for a new depot on Eddington Lane near to the Herne Bay train station and it is expected that its operation will move across by summer/autumn 2016. It is anticipated that this site will soon be available; however the site is in a flood zone 2, which led to Sainsbury's withdrawing a planning application in 2009.

Assuming that the flooding issues could be overcome, a standalone or small run of retail units may be a suitable option for the site, subject to market demand. With this option some car parking and a servicing area would be required to cater for the needs of a modern retailer.

It is anticipated that a unit(s) could be delivered providing around 2,100 sqm gross floorspace, subject to market demand. Once this is reduced down to a net figure, this would provide a floorspace of around 1,500 sqm. In order to provide a robust assessment of the site, the potential for mezzanines should be included and working on the basis of a 50% coverage, this could provide an additional 750sqm of retail floorspace at the site.

Site Appraisal

Site Description:	Ref:	Site Size:	Estimated Capacity:
Herne Bay, Central Development Area,	6	1.27ha	3,200sqm



Availability:	Current Use:	The site is currently in use as a surface car park and is split in two by Beach Street.	Surrounding Uses/Character:	The surrounding uses include a Morrisons superstore, leisure centre, a cinema and the Council's offices.		
Existing Structures:	N/A					
Protected Areas:	TPO:	N/A	Heritage:	N/A	Conservation Area:	Lies within the Herne Bay Conservation Area.
Suitability:	Site Access:	Access to the site could be gained from a variety of points on Beech Street. There may also be potential to access the western part from King's Road to the south.	Flooding:	Part of the site lies within flood zone 2.	Distance to Primary Shopping Area:	220m Measured using the mapping tool within the local plan
Planning History:	CA//14/01115: Partial re-development of car park and demolition of existing single-storey building to provide 1,665 sq.m foodstore, associated access, servicing and landscaping, and retention of 80 car parking spaces.					
Relevant Policy:	<p>The site is included in the Herne Bay Area Action Plan as a key site for mixed use development along with comprehensive and structured environmental improvements. In particular the Council will encourage delivery of additional community, residential, retail, health, office and leisure uses.</p> <p>The site is identified within the adopted Herne Bay Masterplan (2011) which recognises an opportunity to develop the northern part of the carpark with three storeys of accommodation comprising A3 and A1 uses on the ground floor with two storeys of residential accommodation above. To the south a six storey unit is envisaged which will accommodate two storeys of A1 retail use above this will be two storeys of healthcare accommodation and two storeys of hotel accommodation.</p>					
Evidence Base:	<p>The site is included in the Employment Land review (EL3) with the potential use being Office (A2, B1a).</p> <p>The Transport Strategy also identifies that there is an adequate supply of car parking in Herne Bay, except on Saturdays when demand is close to capacity. This is due to the loss of 166 spaces in Kings Road car park, which was previously lost for a Saturday market, but will now be lost to facilitate the Aldi. The Area Action Plan for Herne Bay also aims to protect current overall levels of car parking facilities.</p>					

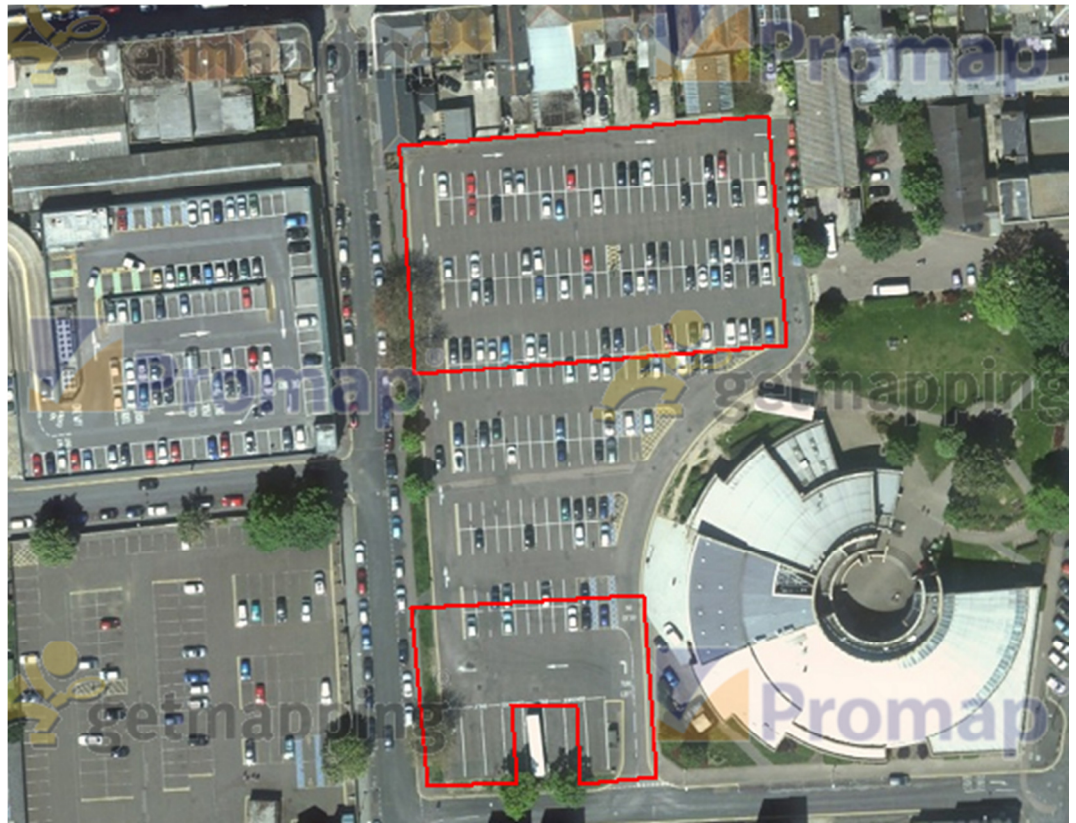
Potential Developable Area:

The site is in two parts and is currently in use as a car park. The Council have granted planning permission for an Aldi on the King's Road Car Park and as such this western part of the site is not available.

Any further loss of car parking for Herne Bay needs to be carefully considered, but assuming this could be overcome during the plan period then the site could accommodate a number of options. There would be a need to retain some car parking, suitable access to the rear of the retail units fronting High Street to the north of the car park and the pedestrian access through to William Street to the east of the car park.

The option below accords with the indicative plans within the Herne Bay Masterplan. The unit to the north of the car park would contain A1 retail floorspace on the ground floor and could provide 2,700 sqm (gross) or approximately 1,900sqm (net) of retail floorspace.

The unit to the south would contain two storeys of A1 retail floorspace providing 1,850 sqm (gross) or approximately 1,300 sqm of retail floorspace.



Summary

The site is in an edge of centre location, well related to the main retail facilities fronting High Street and is currently in use as a car park. The Council have recently granted planning permission for an Aldi on the King's Road Car Park. The developer expects to start on site imminently and as such this western part of the site is not available.

Any further loss of car parking for Herne Bay needs to be carefully considered, especially as parking is nearly at capacity on Saturdays. This is critical if car parking were to be replaced with further retail, which in turn would be likely to create a further demand for car parking.

Until some replacement or additional car parking facilities can be found for Saturday, no further development of the car parks would be anticipated.

Assuming this could be overcome during the plan period, then the site could accommodate a number of options. There would be a need to retain some car parking, suitable access to the rear of the retail units fronting High Street to the north and the pedestrian access through to William Street to the east of the car park.

The site is identified within the adopted Herne Bay Masterplan (2011) which recognises an opportunity to develop the northern part of the carpark with three storeys of accommodation comprising A3 and A1 uses on the ground floor with two storeys of residential accommodation above. The unit to the north could provide 2,700 sqm (gross) or approximately 1,900sqm (net) of retail floorspace.

To the south a six storey unit is envisaged which will accommodate two storeys of A1 retail use above this will be two storeys of healthcare accommodation and two storeys of hotel accommodation. The unit to the south could provide 1,850 sqm (gross) or approximately 1,300 sqm of retail floorspace.

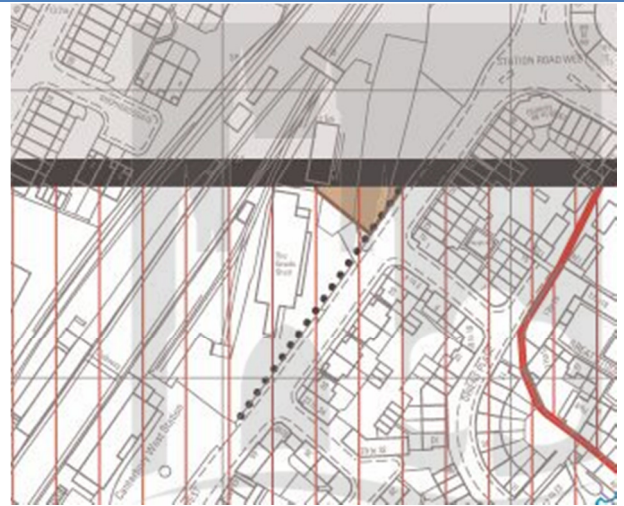
In total this location could accommodate a mixed use development with an A1 retail floorspace of around 4,550 sqm (gross) or 3,200sqm (net). This is a robust assessment of the total quantum of floorspace as it is likely that there would be some convenience floorspace provided within the two units identified

APPENDIX B: Potential out of centre sites

Site Appraisal

Site Description:	Ref:	Site Size:	Estimated Capacity:
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Land to the north of Canterbury West Station, Canterbury	7	0.44ha	
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Availability:	Current Use:	The site is currently vacant greenfield land.	Surrounding Uses/Character:	The surrounding uses are largely residential with the railway line and station to the north of the site.		
Existing Structures:	N/A					
Protected Areas:	TPO:	N/A	Heritage:	N/A	Conservation Area:	Site lies within the Canterbury (West Station) Conservation Area
Suitability:	Site Access:	Access to the site would be taken from Station Road West	Flooding:	N/A	Distance to Primary Shopping Area:	330m Measured using the mapping tool within the local plan
Planning History:	No planning history found.					
Relevant Policy:	The site is included in the draft local plan allocated under policy HD1 for housing development.					
Potential Developable Area:	As the site is in an out of centre location and is allocated for housing, it is not considered a suitable sequential site for retail purposes.					

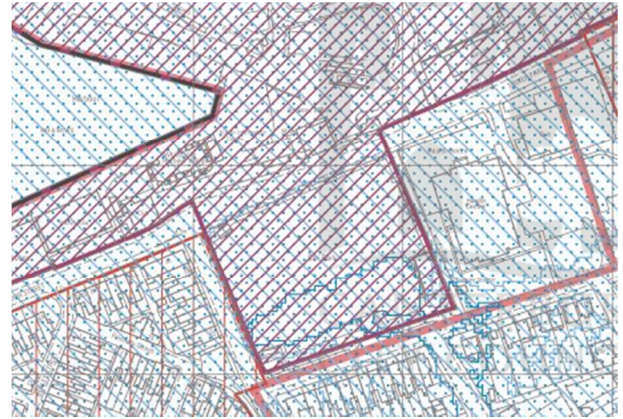
Summary

This is a greenfield site to the east of Canterbury West Station which is currently grassed. It is in an out of centre site, and does not have any obvious links with the remainder of the shopping facilities in Canterbury. Notwithstanding this the site is a sustainable location.

As the site is in an out of centre location and is allocated for housing in the draft Local Plan, it is not considered a suitable sequential site for this assessment.

Site Appraisal

Site Description:	Ref:	Site Size:	Estimated Capacity:
Gorrell Tank Car Park	8	0.73ha	



Availability:	Current Use:	Currently in use as pay and display surface car parking	Surrounding Uses/Character:	To the east lies a health centre and to the south and west residential units. To the north is the mariner.		
Existing Structures:	N/A					
Protected Areas:	TPO:	N/A	Heritage:	N/A	Conservation Area:	The site lies just east of the Whitstable Town Conservation Area.
Suitability:	Site Access:	Site is accessed via Harbour Street and is already established	Flooding:	Lies within flood zone 3	Distance to Primary Shopping Area:	400m to primary shopping frontage measured using mapping tool
Planning History:	CA/06/01049: Provision of an additional 22 car parking spaces.					
Relevant Policy:	The site is covered by Policy TCL 10, which identifies the site as part of Whitstable Harbour where fishing, industrial, office / business, leisure and parking are identified uses					
Evidence Base:	Car parking in Whitstable is raised as an issue in the Canterbury District Transport Strategy, with overall parking demand identified at 83% of supply, although this site (Gorrell Tank) was at 70% capacity at the weekend and 24% during the week.					
Potential Developable Area:	<p>The site is within flood zone 3 and as such any development would need to consider the exception test for development, unless developed for water compatible or water based uses. Retail is not one of those uses. Car parking in Whitstable is clearly an issue, therefore in addition to the exception test, the loss of car parking would need to be carefully considered.</p> <p>Until these matters have been resolved, and it is doubtful whether the flooding issue could be addressed, then this site is not considered suitable for retail purposes as part of this sequential assessment.</p>					

Summary

Although the site is 400m from the PSA, it is still located within the town centre boundary. The site benefits from a good frontage to Harbour Street and good access from Westgate Terrace, where the current car park gains its access.

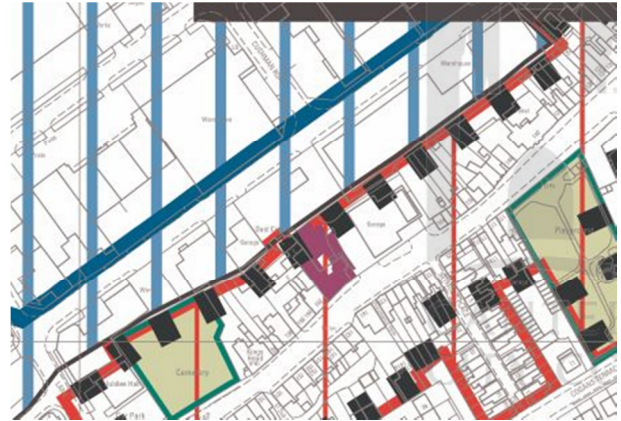
Despite these positive aspects, the site is within flood zone 3 and as such any development would need to consider the exception test for development, unless developed for water compatible or water based uses. Retail is not one of those uses.

Car parking in Whitstable is clearly an issue, therefore in addition to the exception test, the loss of car parking would need to be carefully considered.

Until these matters have been resolved, and it is doubtful whether the flooding issue could be addressed, then this site is not suitable for retail purposes as part of this sequential assessment.

Site Appraisal

Site Description:	Ref:	Site Size:	Estimated Capacity:
Roger Bitton Carpets, Wincheap, Canterbury	9	0.06ha	


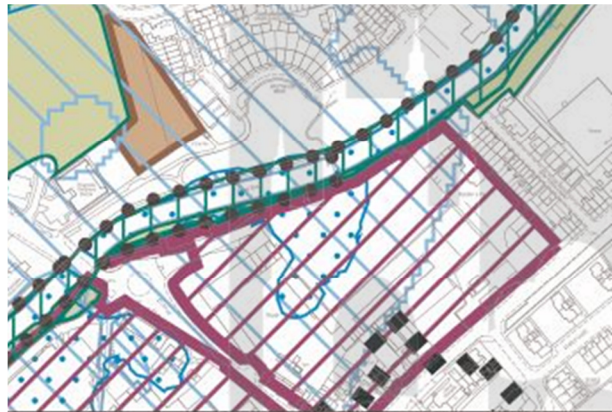


Availability:	Current Use:	The site contains a derelict retail unit	Surrounding Uses/Character:	To the north east lies a petrol filling station and to the south west further retail units.		
Existing Structures:	The disused carpet show room is still in place on the site.					
Protected Areas:	TPO:	N/A	Heritage:	Within an Area of Archaeological Importance.	Conservation Area:	The site lies within the Canterbury City Conservation Area.
Suitability:	Site Access:	Site is accessed off Wincheap.	Flooding:	N/A		
Planning History:	(CA//13/00868): demolition of existing building and construction of three and four storey development comprising of 2 three bedroom houses, 7 one and two bedroom apartments and one 50 square metre ground floor retail unit. This proposal would see a reduction in the level of retail floorspace at the site of 450sqm (gross).					
Relevant Policy:	The site is identified within the emerging local plan policy TCL10 for retail and leisure development.					
Evidence Base:	The site is not mentioned within the Employment Land Review or the SHLAA.					
Potential Developable Area:	This site currently benefits from planning permission for the redevelopment for retail and residential purposes, including the reduction in retail floorspace of 450 sqm (gross).					
Summary						

Although this site is currently identified in the emerging local plan as suitable for housing and leisure, it currently benefits from planning permission for the redevelopment for retail and residential purposes. This includes the reduction in retail floorspace of 450 sqm (gross).

As this site benefits from planning permission, including a reduced level of retail floorspace, it is not considered available for further retail purposes.

Site Appraisal

Site Description:	Ref:	Site Size:	Estimated Capacity:			
Coach Park and Serco site, Kingsmead Road Canterbury	10	1.97ha	TBC			
						
Availability:	Current Use:	The site is currently in use as a coach park with a former Serco office building on the south western side.	Surrounding Uses/Character:	The surrounding uses are mixed and include large scale retail uses to the south, residential units to the north and light industrial uses to the west.		
Existing Structures:	The former Serco buildings are still on the site.					
Protected Areas:	TPO:	N/A	Heritage	N/A	Conservation Area:	N/A
Suitability:	Site Access:	Access to the site would be taken from Kingsmead Road roundabout, opposite Sainsburys	Flooding:	The majority of the site falls within flood zone 2 with a small portion within flood zone 3	Distance to Primary Shopping Area:	475m Measured using the mapping tool within the local plan
Planning History:	<p>CA//10/00403: Sewerage upgrade works. Change of use from storage area to Wastewater Pumping Station including Motor Control Centre Kiosk, Storage Kiosk, Vent Stack and Outfall Structure.</p> <p>CA//09/01253: Erection of temporary theatre marquee (with associated equipment, generators, toilet units and heating) during the periods of November 2009 - February 2010, November 2010 - February 2011 and November 2011 - February 2012.</p> <p>CA//94/00931: Change of use from general market to coach park.</p> <p>CA//86/01421: Alterations and improvements to existing building to provide minor repairs/storage facilities and improved general stores.</p> <p>Canterbury City Council and property developer Bouygues Development have signed an agreement for a project that will see a multiplex cinema, restaurants, other leisure outlets and housing built at Kingsmead.</p>					
Relevant Policy:	<p>The Kingsmead area of Canterbury is one of Canterbury City Council's key priorities and the Kingsmead area is identified as a Regeneration Zone in the Canterbury Local Plan 2006 (Policy TC13). The Kingsmead Development Brief, adopted in 2004, sets out the development aspirations for the area. The list of uses suggested at the time included:</p>					

	<ul style="list-style-type: none"> • Cinema, Bingo Hall, Casino, Bowling Alley and other indoor leisure uses • Retail, Restaurants, Pubs, Cafes • Residential dwellings • Office / business accommodation • Hotel • Car Parking <p>It is noted that a proposed cap on retail floorspace of 2,500 sqm was proposed in the development brief.</p> <p>The site is included in emerging policy TCL10 which suggests the following uses; retail, leisure, business and residential.</p>
Evidence Base:	The site does not feature in the Employment Land Review or the SHLAA.
Potential Developable Area:	<p>In May 2015 Bouygues Development was chosen as Canterbury City Council's preferred Development Partner.</p> <p>An initial round of consultation has been undertaken in the final quarter of 2015 and this identified an initial quantum of development including:</p> <ul style="list-style-type: none"> • A new state-of-the-art cinema with 8 to 10 screens • A wide range of commercial units, including restaurants, shops, bars and other leisure uses • A cultural square providing an area to host civic events, markets, outdoor theatre productions and seasonal activities such as ice skating • 500 purpose built and managed student living units • A mixture of 65 family homes and apartments • 300 car parking spaces in an undercroft car park • Additional parking for all family homes and apartments • Opening up public access to the River Stour through a new riverside walkway <p>It is noted that there was no quantum of A1 floorspace for the proposal, but given that there is a range of development proposed in a mixed use proposal for the site, the proposed level of floorspace is anticipated to be relatively small.</p> <p>In any case it would need to address the relevant tests for out of centre proposals, but in order to provide a robust assessment the maximum cap of 2,500sqm (gross) identified in the Development Brief would indicate a potential net floorspace of 1,750sqm.</p>
Summary	
<p>The site is in an out of centre location, but is included in emerging policy TCL10 which suggests that retail, leisure, business and residential uses would be appropriate in principle.</p> <p>In May 2015 Bouygues Development was chosen as Canterbury City Council's preferred Development Partner. An initial round of consultation has been undertaken in the final quarter of 2015 and this identified an initial quantum of development including:</p> <ul style="list-style-type: none"> • A new state-of-the-art cinema with 8 to 10 screens • A wide range of commercial units, including restaurants, shops, bars and other leisure uses • A cultural square providing an area to host civic events, markets, outdoor theatre productions and seasonal activities such as ice skating • 500 purpose built and managed student living units • A mixture of 65 family homes and apartments • 300 car parking spaces in an undercroft car park • Additional parking for all family homes and apartments • Opening up public access to the River Stour through a new riverside walkway <p>It is noted that there was no quantum of A1 retail floorspace for the proposal, but given that there is a range of development proposed in a mixed use proposal for the site, the proposed level of floorspace is anticipated to be relatively small.</p> <p>In any case it would need to address the relevant tests for out of centre proposals, but in order to provide a robust assessment the maximum cap of 2,500sqm (gross) identified in the Development Brief would indicate a potential net floorspace of 1,750sqm.</p>	

APPENDIX C: Capacity scenarios

WINCHEAP - CAPACITY STUDY

1. Retail targets

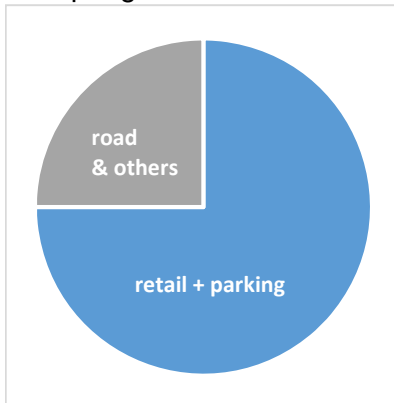
		Existing	Additional	Total
Retail use	GEA	27,763 sqm	56,333 sqm	84,096 sqm
	Net Area = 60% GEA	16,658 sqm	33,800 sqm	50,458 sqm

2. Target Areas Breakdown

		Park&Ride site	Main site	Total
Retail use	GEA	4,500 sqm	79,500 sqm	84,000 sqm
	Footprint = 2/3*GEA	3,000 sqm	53,000 sqm	56,000 sqm
Car parking	Spaces = GEA/30	150	2,650	2,800
	Area = (GEA/30)*25	3,750 sqm	66,250 sqm	70,000 sqm
Site	Area	14,800 sqm	90,800 sqm	105,600 sqm

Assumptions: maximum 75% of the site area will be built on - 25% will be roads, servicing, public realm

Footpring ratio



retail + car parking	75%
roads, servicing, etc.	25%

WINCHEAP - CAPACITY STUDY

Scenario 1: all surface car parking

$$\frac{2}{3} * \text{GEA} + (\text{GEA}/30) * 25 = 75\% * \text{Site area}$$

Retail GEA	45,400 sqm
Retail Footprint	30,267 sqm
No. of parking	1,513

Scenario 2: 1 deck/ 2 level car parking

$$\frac{2}{3} * \text{GEA} + (\text{GEA}/30) * 25 * 1/2 = 75\% * \text{Site area}$$

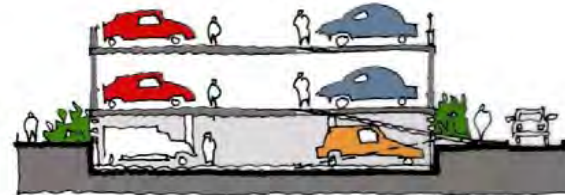
Retail GEA	62,862 sqm
Retail Footprint	41,908 sqm
No. of parking	2,095



Scenario 3: 2 decks / 3 level car parking

$$\frac{2}{3} * \text{GEA} + (\text{GEA}/30) * 25 * 1/3 = 75\% * \text{Site area}$$

Retail GEA	72,106 sqm
Retail Footprint	48,071 sqm
No. of parking	2,404



Scenario 4: 3 decks / 4 level multi-storey car parking

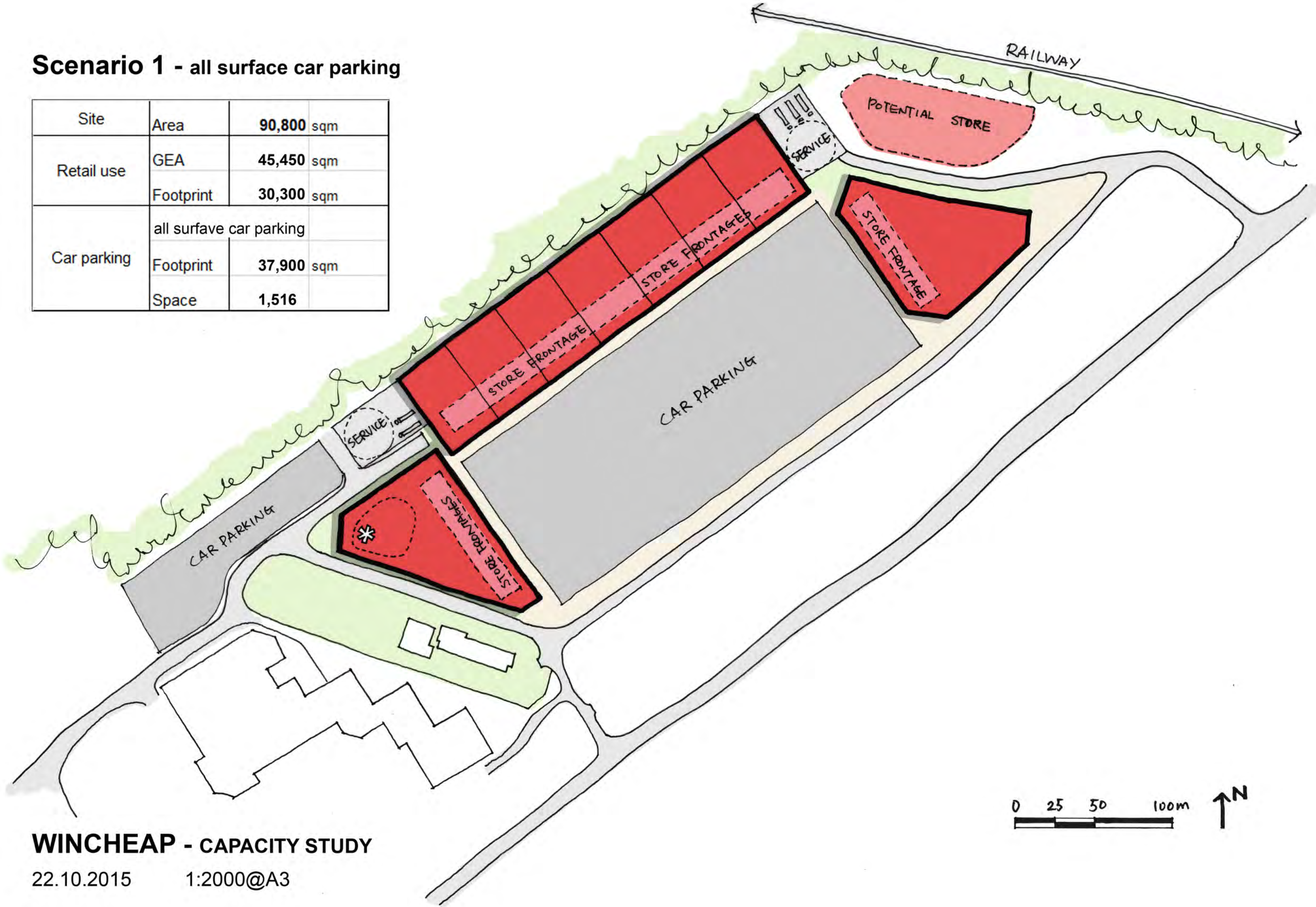
$$\frac{2}{3} * \text{GEA} + (\text{GEA}/30) * 25 * 1/4 = 75\% * \text{Site area}$$

Retail GEA	77,829 sqm
Retail Footprint	51,886 sqm
No. of parking	2,594



Scenario 1 - all surface car parking

Site	Area	90,800 sqm
Retail use	GEA	45,450 sqm
	Footprint	30,300 sqm
Car parking	all surfave car parking	
	Footprint	37,900 sqm
	Space	1,516



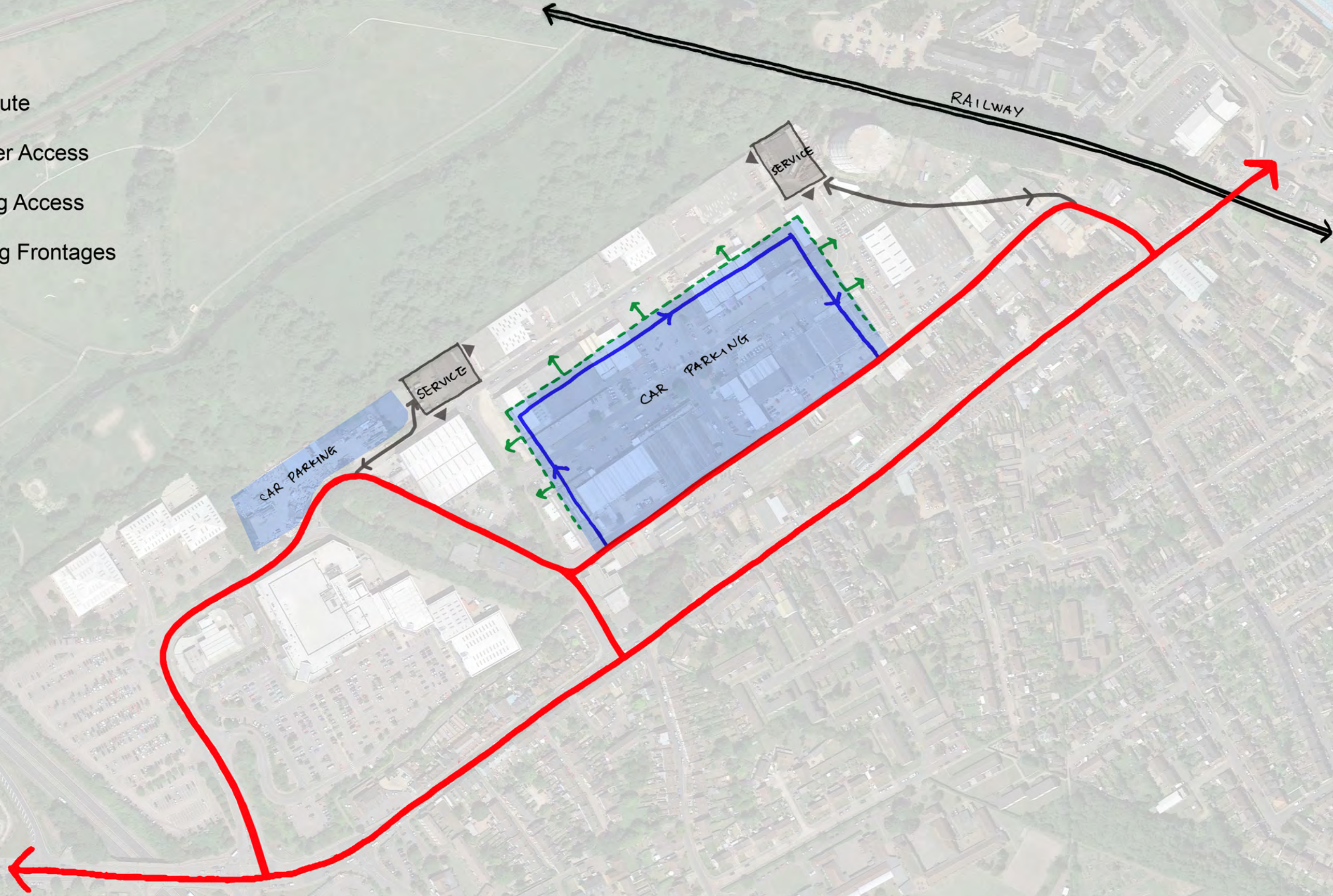
WINCHEAP - CAPACITY STUDY

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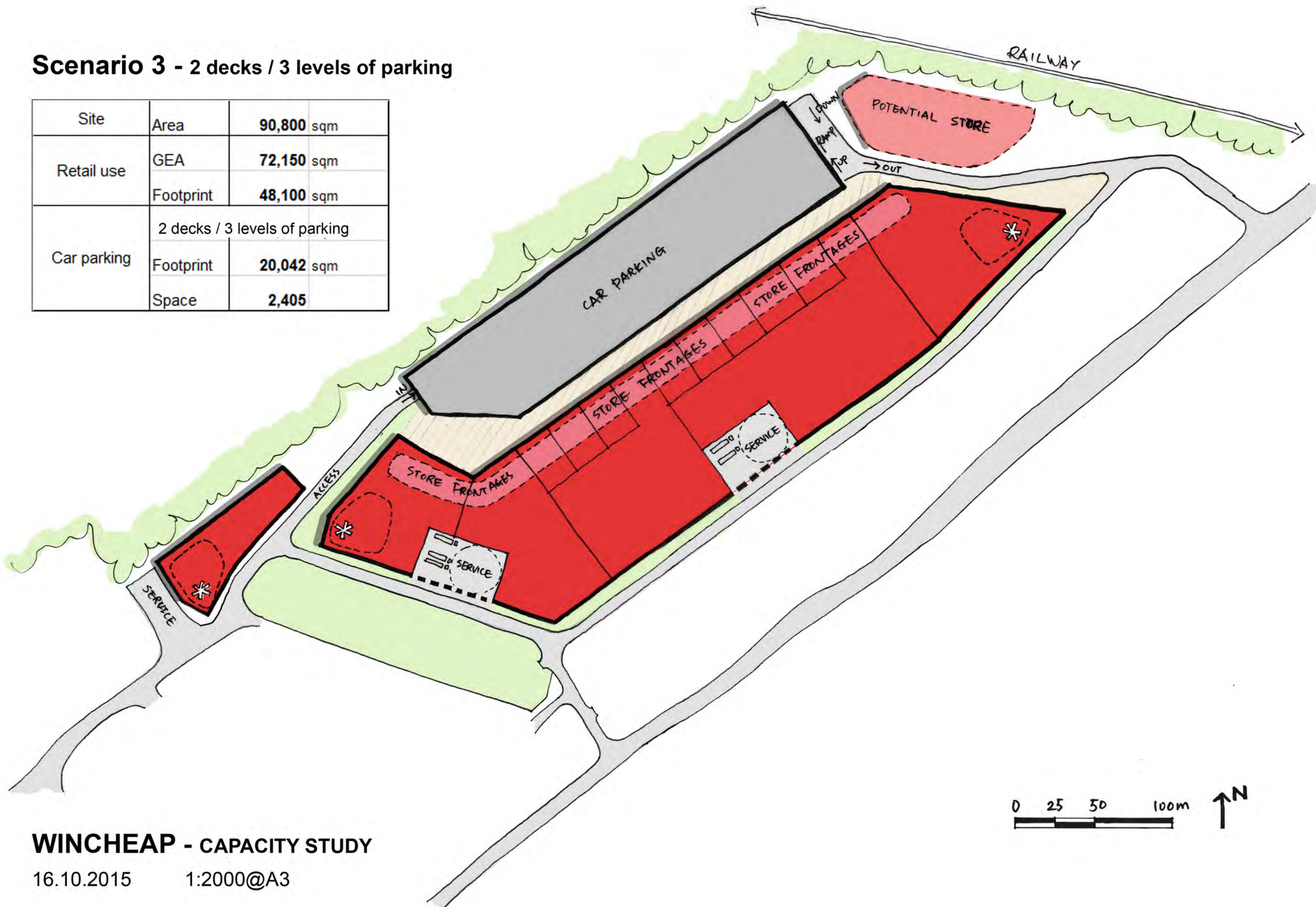
Scenario 1 - all surface car parking

- Main Route
- Customer Access
- ▲ Servicing Access
- Shopping Frontages



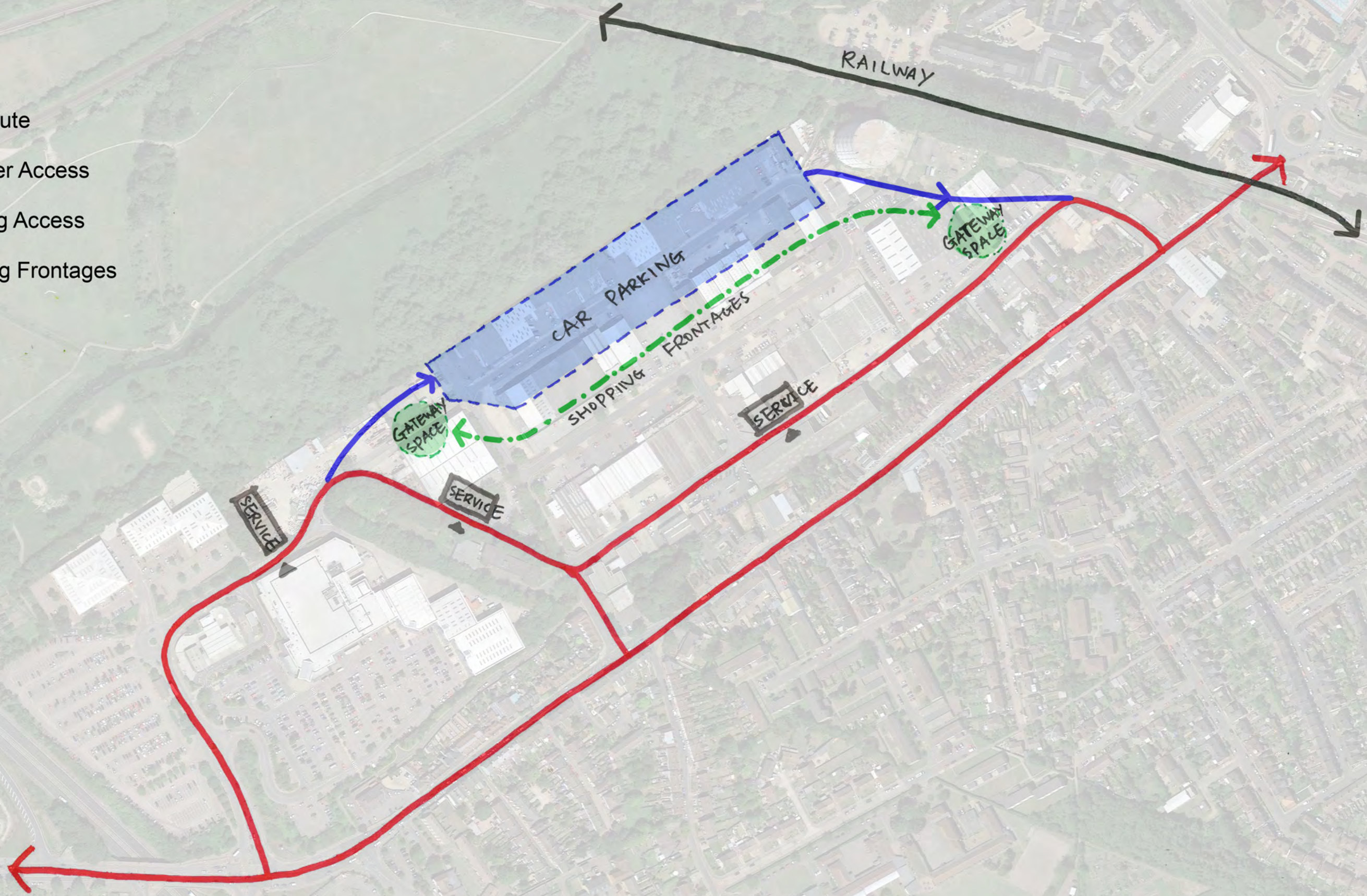
Scenario 3 - 2 decks / 3 levels of parking

Site	Area	90,800 sqm
Retail use	GEA	72,150 sqm
	Footprint	48,100 sqm
Car parking	2 decks / 3 levels of parking	
	Footprint	20,042 sqm
	Space	2,405



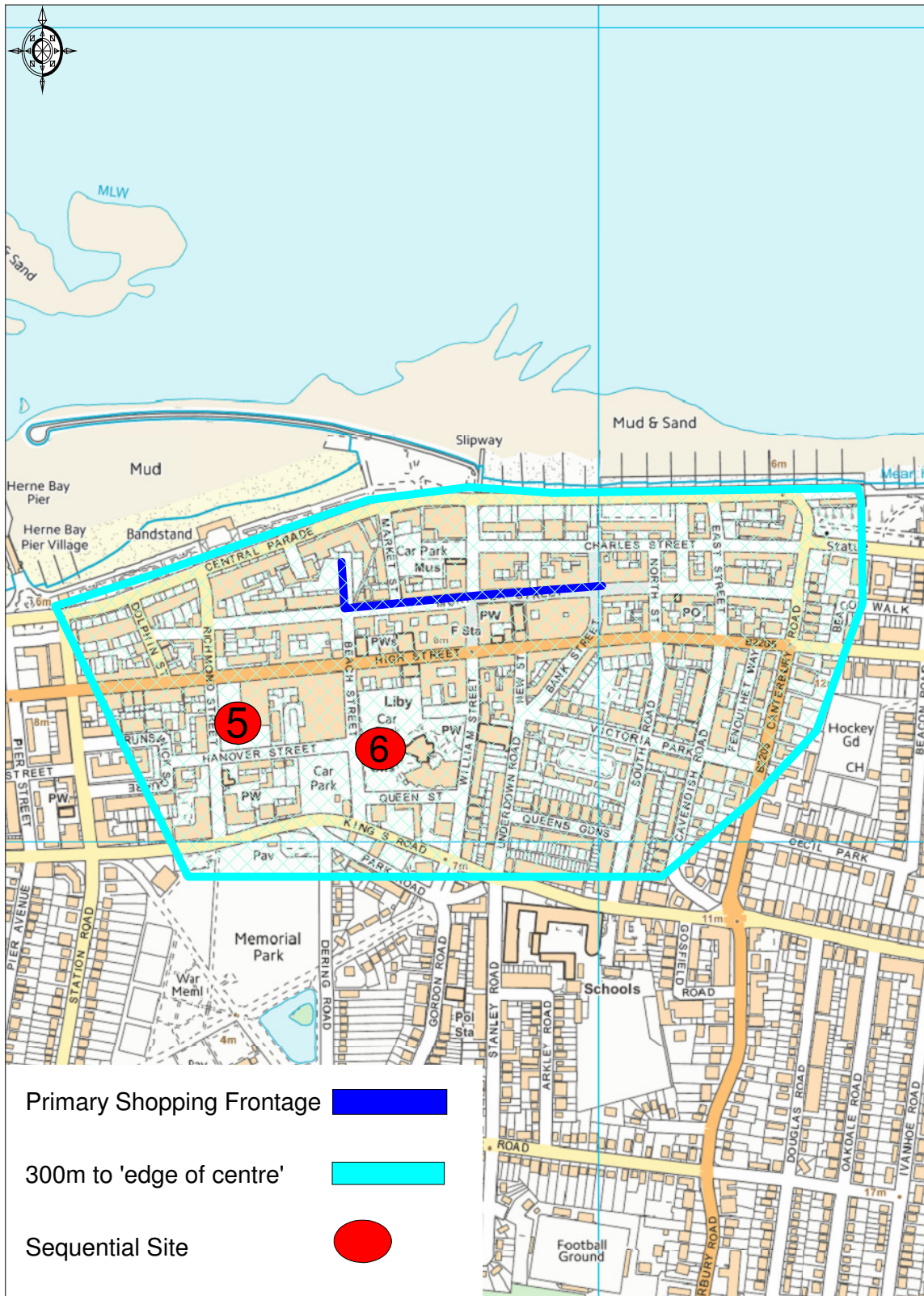
Scenario 3 - 2 decks / 3 levels of parking

- Main Route
- Customer Access
- ▲ Servicing Access
- Shopping Frontages



APPENDIX D: Sequential site locations

Herne Bay - Sequential Site Locations



Whitstable- Sequential Site Location

