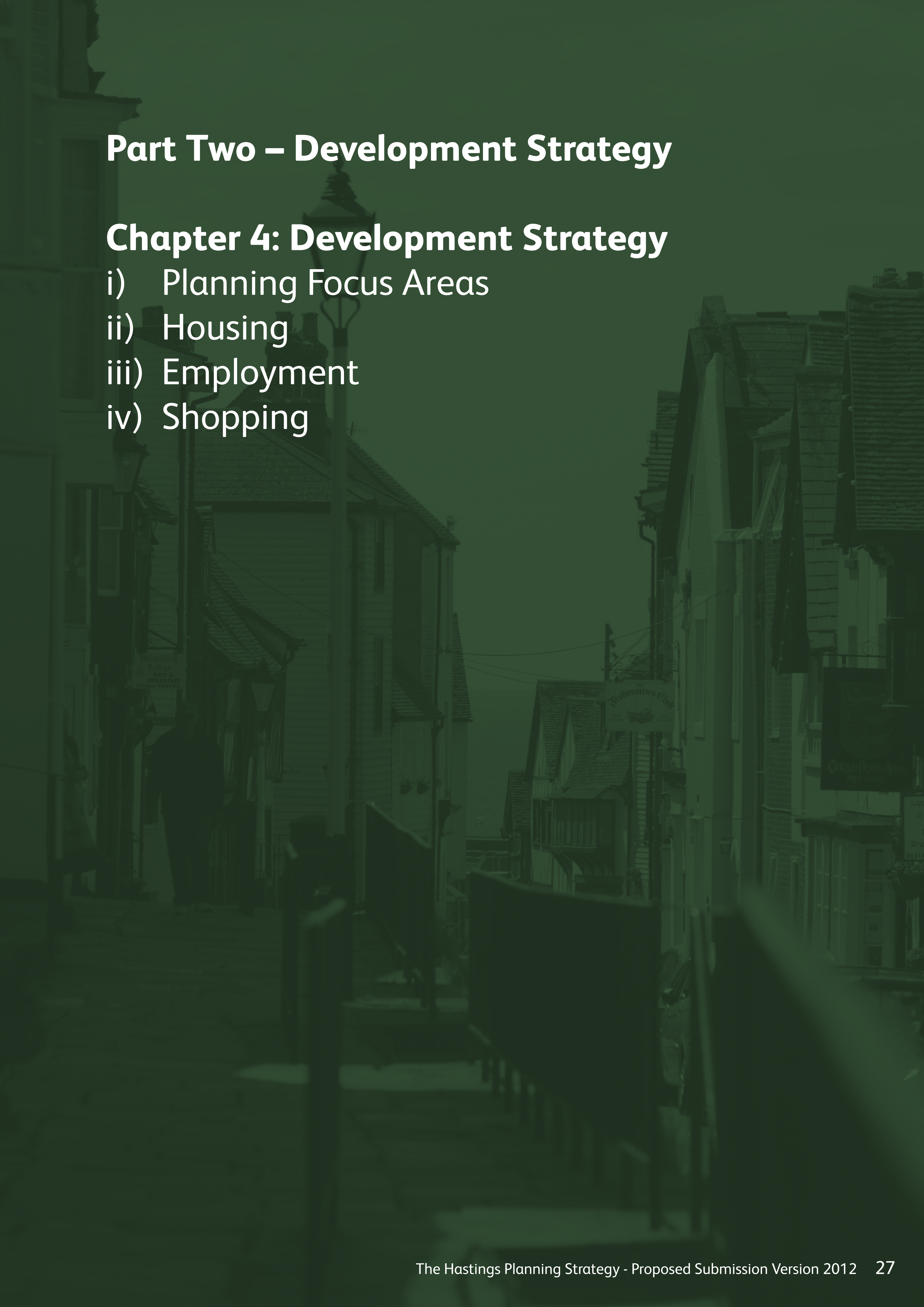
Part Two – Development Strategy

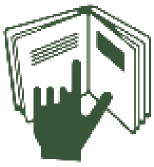
Chapter 4: Development Strategy

i) Planning Focus Areas
ii) Housing
iii) Employment
iv) Shopping



Chapter 4:
The Development Strategy

4.1 This chapter sets out the overall strategy for Hastings. It deals with the big issues, setting out how much development we need, where it will take place, and by when. It explains the three spatial areas that have been identified within the town, and then concentrates on housing, employment and shopping.



As well as the policies on Housing, Employment and Shopping in this chapter, each is dealt with further in part 4 of this document - Theme Based Policies:

Housing within Chapter 7: Housing
Employment in Chapter 8: Local Economy (i) Employment
Shopping in Chapter 8: Local Economy (ii) Town Centres

i) Planning Focus Areas

Locations for development

4.2 Hastings is a small and urban area, and the pattern of future development will be spread around the town. In order to give a picture of what is planned where, we have divided the town into three spatial areas – Western Area, Central Area and Eastern Area. The Seafront has also been identified as a broad area of change, although levels of development will be set out in the respective spatial areas.

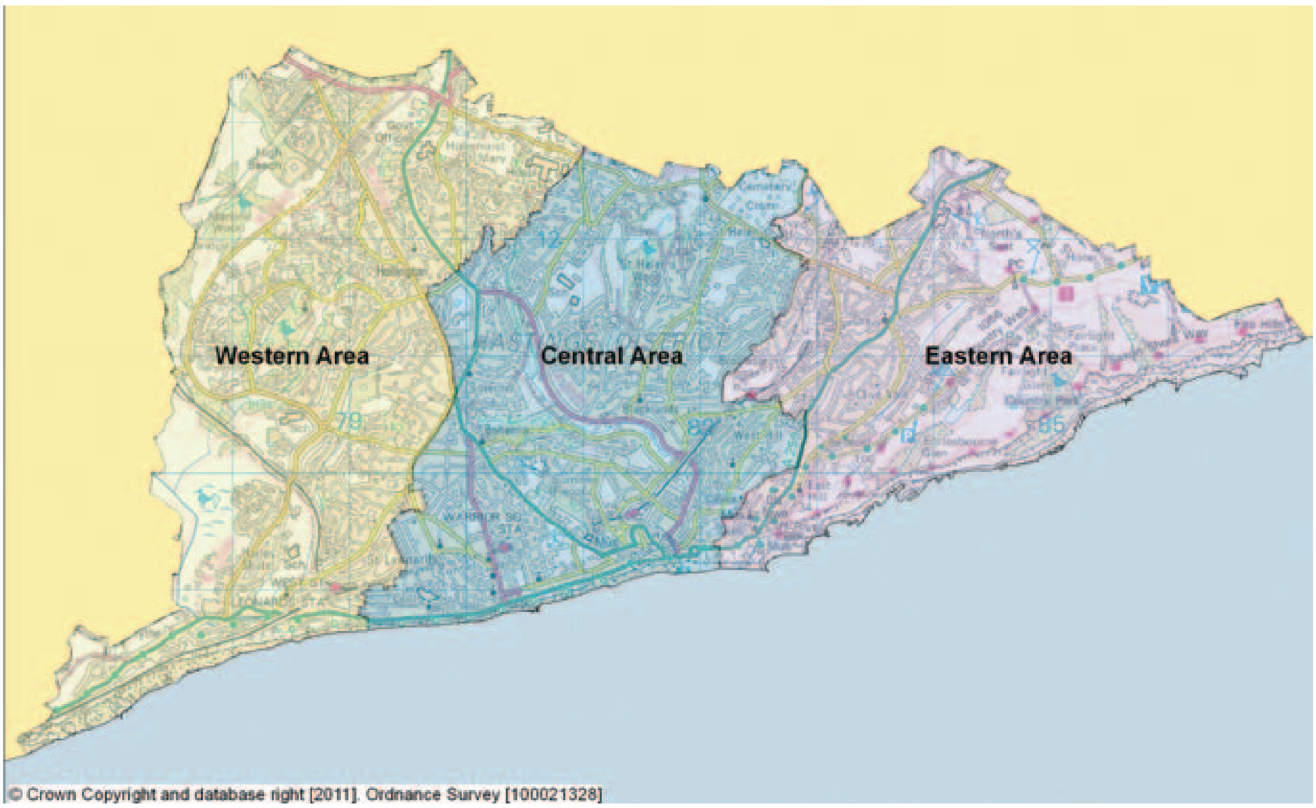


Figure 4: map showing the Western, Central & Eastern areas

The Planning Focus Areas

4.3 To provide a more local perspective and sense of place, the town has been divided further into a number of Planning Focus Areas. These are areas where there is an identifiable community or geography, or where landscape or function means that they make a logical area for spatial planning. In some cases they are areas that have common problems or issues. Boundaries have been drawn as close as possible to Super Output Area (SOA) boundaries, as this is the geography used for the presentation of important statistics such as the Indices of Multiple Deprivation (IMD) and Census data.

4.4 The planning focus areas will provide a useful framework setting the scene for the preparation of the more detailed Development Management Plan, and any Neighbourhood Plans that may be produced by the community. The 13 planning focus areas are:

1. Little Ridge and Ashdown
2. Greater Hollington
3. Filsham Valley and Bulverhythe
4. St Helens
5. Silverhill and Alexandra Park
6. Maze Hill and Burtons' St Leonards
7. Central St Leonards and Bohemia
8. Hastings Town Centre
9. Old Town
10. West Hill
11. Hillcrest and Ore Valley
12. Clive Vale and Ore Village
13. Hastings Country Park

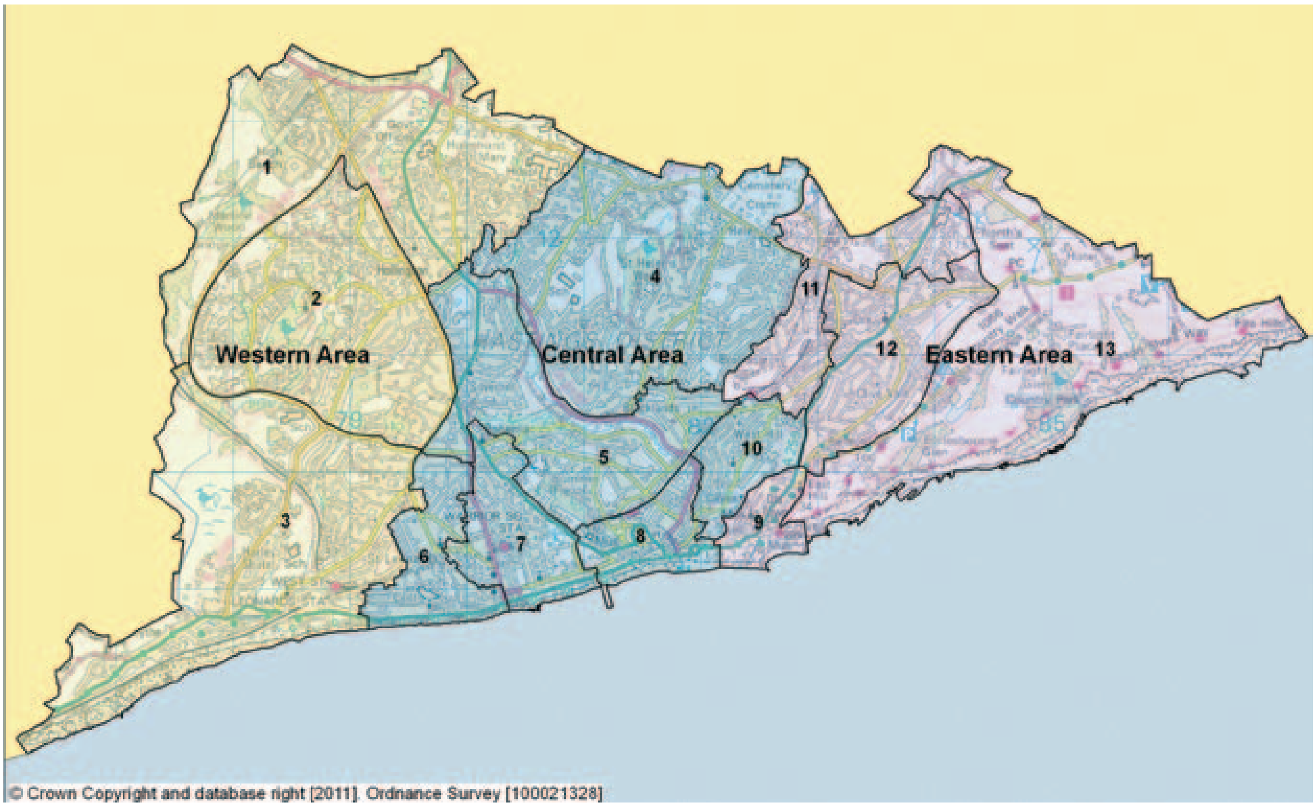


Figure 5: map showing the Planning Focus Areas within Western, Central & Eastern areas

4.5 Strategies for each of the 3 broad spatial areas, including a range of housing development in these areas are set out in the sections that follow. Individual sites to meet the overall housing target (see Policy DS1) will be allocated in the Development Management Plan, although it is important to note that the detailed level of work required for this may result in some adjustments to the numbers and proportions set out in each of the 3 spatial areas. These adjustments will still be acceptable however, provided that they do not diminish the overall total of housing to be delivered.

ii) Housing

Why do we need more homes?

4.6 Access to a decent home for everyone is the foundation for a decent quality of life. A priority of the Council and the Local Strategic Partnership is to increase the availability, affordability and quality of housing and to ensure all sections of our community, in all housing tenures, enjoy safe, desirable, affordable and accessible housing that is appropriate for their needs and aspirations.

4.7 We know that the area of Hastings Borough and Rother District operates largely as a single housing and labour market. We also know that there are some key features of our housing market which distinguish it from other parts of the south-east. These include comparatively low house prices; declining affordability for local people, a bias to smaller dwellings; imbalanced in-migration; a large private rented sector and high levels of deprivation. Left unchecked, some of these processes will continue to act as drivers of change making housing less affordable for local residents, and doing nothing to improve the prospects for economic development and regeneration. Instead, diversifying and renewing our housing stock through new development has an important role to play in fostering much needed economic regeneration and countering the processes that can lead to blighted neighbourhoods.

4.8 Providing the right mix of well designed, good quality housing in conjunction with employment opportunities, has the potential to offer a real and lasting opportunity to promote the town as a thriving, desirable place to live, work and enjoy quality recreation time.

4.9 In determining the number of new homes we need to plan for up to 2028, we have therefore considered the role new houses can play in assisting growth and regeneration. We have also taken into account current demographic projections; the number of people in housing need, and critically, the town's capacity to accommodate new housing development. Though new housing may form an important part of regeneration efforts, we have to reconcile this with the fact that Hastings is a tightly constrained urban area, surrounded by areas of high environmental and landscape importance.

Supporting regeneration

4.10 The Council's preferred way forward is a housing target that allows us to support the following objectives without increasing the pressure to build in the town's most environmentally sensitive areas:

- Employment-led growth – a scale of housing growth that is proportionate to the town's ability to attract new jobs, retain existing ones and help facilitate sustainable travel to work patterns
- Meet the needs of those of working age, including promoting the right mix of housing that encourages higher skilled people to move to the town and to create opportunities for younger people to remain in Hastings. This includes providing more family homes and larger dwellings
- Maximise the provision of affordable housing
- Meet the needs of those residents currently living in unsuitable accommodation – such as overcrowded properties or those in disrepair
- Provide for the needs of the growing number of people of retirement age

Capacity to accommodate housing growth

4.11 The demand for new housing arising from trend-based population and household change and growth would result in a need to build many more new homes than previously thought possible – some 7,840 new homes by 2028 or 461 per year. Taking trend-based population projections in isolation ignores factors such the physical limits to outward growth, therefore it would not be sensible to use trend-based projections alone to determine a future housing target. It is clear from the Council's Strategic Housing Land Availability Assessment (SHLAA)[7] that attempting to meet the level of housing growth implied by the trend-based demographic projections would require substantial release of greenfield land beyond the current built-up area of the town. However, choices with regard to the location of new housing and the outward expansion of Hastings are very limited.

The town's environmental assets, including the nationally important High Weald Area of Outstanding Natural Beauty (AONB) to the north and east of the existing built-up area; the Marline Valley Woods Site of Special Scientific Interest (SSSI) to the north-west, the internationally important Hastings Cliffs Special Area of Conservation (SAC) on the eastern boundary, and the network of important green spaces across the town including Hastings Country Park to the east and Combe Valley Countryside Park to the west, all act as restraints to major outward growth.

4.12 The potential to bring forward greenfield land in the north-west of town, with a view to making a strategic land allocation, has been investigated. This is the only major remaining area of the Borough which is free from nationally important landscape and wildlife designations. The land in question (Breadsell) abuts the nationally important Marline Valley Woods SSSI. Housing potential at Breadsell has been carefully assessed with advice from Natural England and the conclusion reached is that, based on current research, a site could not be allocated. This is because its delivery would be highly uncertain due to the degree to which development might impact adversely on the nationally important Marline Valley SSSI is unknown.

4.13 Instead, if we are to comply with sustainable development objectives, future housing requirements will need to be met essentially through the identification of development opportunities in the urban area; by including an allowance for windfall development; and by making more efficient use of the existing residential stock by bringing back into residential use long term empty homes.

Higher density development

4.14 The potential for higher density[8] residential development and the contribution this can make to meeting housing requirements has been explored. Higher density development, provided it is associated with good design, is considered appropriate for many areas of the town, particularly locations in or close to the town and district centres, or in other areas well served by public transport. Higher density development can help improve affordability and address the housing needs of younger people such as first time buyers or, at the other end of the spectrum, people looking to down size and/or those whose children have left home.

4.15 The potential for a mix of higher density development is already reflected in the Council's estimates of housing capacity through the inclusion of sites that have planning approval or potential sites where high density development may be appropriate, (this will be subject to further examination through the Development Management Plan). Requiring all or the majority of new development to be built at high densities, as a result of adopting an unrealistically high housing target, is considered to run counter to the planning objectives for the town and national planning guidance.

Making the best use of urban and brownfield land

4.16 Future housing requirements will, instead, be met through the identification of a mix of development opportunities which will provide for a range of types and sizes of new dwellings in the urban area and by making more efficient use of the existing residential stock – by bringing back into residential use long term empty homes.

4.17 We will look to develop brownfield housing sites first, wherever possible, although a mix of both brownfield and greenfield may be needed to meet the 5 year supply. (see paragraph 4.26 for am explanation of the five year supply)

4.18 Empty homes are a wasted asset, and a good deal of progress has been made by the Council in tackling empty homes in recent years. However, whilst bringing empty homes back into use does not increase the overall housing stock, it does increase the efficient use of the existing stock. In 2010 there was estimated to be approximately 400 long term empty homes in the town. By long term, we mean homes that have been empty for 2 or more years.

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[7] http://www.hastings.gov.uk/strategic_housing

[8] high, medium & low density development are >50/ha, 30-50/ha and <30/ha respectively)

Balancing homes and jobs

4.19 Our housing target figure aims to support urban renaissance, and to accommodate further development in a way that respected environmental constraints. In particular, it is important not to use demographic forecasts alone as a driver for housing development. This is because the relationship with the economic growth and regeneration, and environmental constraints is much more important in Hastings. The scale of housing development has been determined on the basis that housing growth should not outstrip the ability of the local economy to provide jobs at a corresponding rate. Otherwise we would simply be adding to unsustainable out-commuting. A degree of net out-commuting is not necessarily detrimental to local prosperity, but the trend of an increasing reliance on this, much by car, does have adverse consequences in terms of sustainable development. It is also a sign of an inherent weakness in the local economy.

Working with Rother District Council

4.20 In accordance with national guidance and as part of the duty to cooperate required by the Localism Act 2011, together with Rother District Council, the Council has jointly explored housing needs across the whole housing market area. This is documented in the background paper "Assessment of Housing Need in the Hastings & Rother Housing Market Area", which draws together information contained in the evidence base for the two authorities planning strategies. Notably, the Hastings & Rother Strategic Housing Market Assessment (SHMA)[9] shows that development at North Bexhill is as important to the housing and employment growth for Hastings as it is to Bexhill.

The New Homes target

4.21 Between 2011 and 2028 the net new homes target will be for 3,400 homes, based on the rationale set out in paragraph 4.10.

4.22 The target is equivalent to 200 net new homes per annum (as compared to the 210 per annum target contained in the South East Plan). This target will be achieved through the delivery of identifiable development sites between 2011 and 2022, after this period some reliance on windfall development will be necessary. In addition, in line with the Council's Empty Homes Strategy, it is planned that the targeted return of long term empty homes back into residential use by this Council will occur across all years of the Strategy and that the re-use of these homes will contribute to meeting the overall housing target.

4.23 On the basis of the current Empty Homes Strategy (2009 – 2013), it is anticipated that approximately 255 long-term empty homes will be returned to use up to 2028.

4.24 The new homes will be delivered primarily through private development, but there will be considerable partnership working with Registered Providers (RPs) in the delivery of affordable housing.

Sources of new homes likely to come forward by 2028	Net number of units
Units completed 2011/12	195
Sites under construction and/or with unimplemented planning permission as at 1 April 2012	1,379
Additional dwellings indicated by the Strategic Housing Land Availability Assessment (not included in the above)	1,378
Small site (less than 6) windfall allowance 2023/24 to 2027/28	200
Long term empty homes brought back into residential use, 2011/12 to 2027/28	255
TOTAL	**3,407**

Table 1: Delivering the housing allocation 2011 - 2028

4.25 Strategic Policies FA1, FA2 and FA5 show a broad distribution of the proposed housing land supply. Individual sites to meet the overall housing target will be identified in the Development Management Plan.

[9] www.hastings.gov.uk/localplan/evidencebase

4.26 The Council is required to demonstrate and maintain a continuous rolling supply of specific deliverable sites sufficient to provide five years worth of housing against the overall housing target. National guidance requires the 5-year supply to include an additional allowance of 20 %, which in effect, will equate to a 6 year supply. The latest position is set out in the Annual Monitoring Report. This will track the progress of housing completions against Policy DS1 and make an annual reassessment about the adequacy of the supply of deliverable and developable housing land. The Council will use the annual monitoring process to manage land supply. Action will be triggered to increase supply if monitoring reveals that housing completions have fallen below the expected rate of delivery set out in the trajectory and a review of site deliverability indicates that the trajectory is unlikely to be recovered over the next five years without action.

4.27 The latest monitoring update (2011-12) concludes that there are sufficient housing sites to deliver 1,225 housing units from 2013/14 to 2017/18. This is equivalent 6.2 years supply. The housing trajectory is shown in Appendix 2.

4.28 Windfall development has made a significant contribution to housing delivery in the past. Small site windfalls (less than 6 dwellings) will continue to come forward over all years up to 2028, although it is not necessary to rely on windfall delivery in the first 10 years of the Planning Strategy period. Between 2023 and 2028, an average of 40 windfall dwellings per year has been assumed.

4.29 The Development Management Plan and future reviews of the SHLAA may identify new sites, thereby reducing the reliance on windfall. This will be reported on in the Annual Monitoring Report.

POLICY DS1: New Housing Development

The target for housing development will be 3,400 net new homes for the period 2011 – 2028.

Sites will be allocated in the Development Management Plan to meet this target.

In order to maintain and make effective use of the existing housing stock, the Council will bring back into residential use empty housing in line with its Empty Homes Strategy.

In order to protect the existing stock of family size housing, existing homes should remain as dwellings unless they are unsuitable for residential uses, or would be replaced with new residential development.

A 'plan, monitor and manage' approach will be adopted based upon the Annual Monitoring Report and updates of the Strategic Housing Land Availability Assessment, through which progress on housing delivery and the continuous maintenance of a five-year rolling supply plus 20% will be tracked.

Housing Implementation Strategy:

Housing land supply will be managed in the following way:

If the Annual Monitoring Report reveals that the five-year housing land supply plus 20% cannot be met, the Council will take action to increase the supply of deliverable housing sites by:

- **Working with land owners, public bodies and developers to bring sites forward;**
- **Promoting Hastings and particular sites to investors;**
- **Investigating reasons for the delay in sites coming forward and consider using Compulsory Purchase powers if necessary in order to progress development;**
- **Using its own land to stimulate development/interest.**

iii) Employment

4.30 National policy indicates that local authorities need to set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth.

4.31 Hastings is a major employment centre not just for residents of Hastings but also in the wider Hastings labour market or travel-to-work-area (TTWA) which embraces most of Rother (over 90 % of its population) and is bordered by Eastbourne, Tunbridge Wells and Ashford. Yet in economic terms Hastings is weak, ranked amongst the 20 most deprived boroughs in the Country, with low levels of educational achievement and skills levels, lower average earnings compared to the rest of the South East and in recent years falling job density, (that is the ratio of total jobs to people of working age population). Until very recently, in common with other south coast towns, Hastings has not developed as a location for inward investment, relying on local business growth and the public sector as economic drivers.

4.32 However, Hastings has been pursuing an ambitious, collaborative approach to economic and cultural renaissance. Since its formation in 2003, Sea Space[10] and the wider Hastings & Bexhill Task Force has:

- constructed over 18,000m² of high quality business space in Hastings, including One Priory Square, Lacuna Place and a Creative Media and Innovation Centre
- facilitated over 7,000m² of education space for higher / further education use – Hastings is now a University town;
- established Enviro21, a modern industrial park focused on the growth of environmental technology companies and advanced manufacturing;
- created capacity for 1,700 new jobs, including the decision by SAGA in late 2010 to locate in Hastings' Priory Quarter, creating up to 800 additional private sector jobs.

4.33 These developments offer a real and lasting opportunity to promote the town as a thriving, high quality business location and a desirable place to live and enjoy quality recreation time.

Providing for new jobs

4.34 This section focuses on economic development and specifically business uses[11].

4.35 Population projections[12] continue to show a reducing workforce – when housing growth and other projections are factored in. An important qualification about these projections is that they represent what is projected to happen based on the current population structure and past patterns of migration, as well as prevailing economic activity rates (2008 base). Planning for a smaller workforce in effect represents planning for the status quo, and fails to take account of important policy factors, in particular:

- national policy to stimulate economic growth
- the strong local commitment to reverse the economic fortunes of the area, not least to address relatively low economic activity and high unemployment
- desire to reverse the long term trend towards increased dependence on jobs elsewhere

4.36 The Planning Strategy therefore aims to counteract the projected reduction in the workforce by assisting employment creation through the provision of land and premises for employment purposes and by encouraging the development of more family housing. This is intended to alter the characteristics of in-migration.

4.37 The Employment Strategy and Land Review (ESLR)[13], updated August 2011 and jointly prepared with Rother District Council, estimates that the total number of jobs needed in Hastings over the period 2008-2028 is c.6,470. This is based on workforce projections with allowances for achieving higher economic activity rates and a closer balance between the number of indigenous jobs and the number of local workers. Out-commuting is not in itself detrimental to local prosperity, particularly where people are able to travel to better paid jobs and thus bring more money into the Hastings economy. However, sometimes it is an indicator that there is insufficient availability of jobs locally. Overall therefore, although it is to be expected that there will be many workers travelling both into and out of Hastings to work (particularly within the travel to work area), the Plan

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[10] With the abolition of the regional development agency - SEEDA, the local arrangements for taking regeneration forward are being recast but local partners are determined to continue and build on the progress achieved to date

[11] Business uses are those essentially within Class B of the Use Classes Order, including offices, research and development uses, light manufacturing, general industry, warehousing/storage and similar "sui Generis" uses

[12] East Sussex County Council population projections 2011

[13] www.hastings.gov.uk/localplan/evidencebase

[14] comprises use classes B1 – Business, B2 – General industrial and B8 – Storage or distribution, as defined by the Use Classes Order 2010

seeks a healthy economy where there are sufficient jobs within the Borough to support the population. In sustainability terms a better balance of homes and jobs locally is desirable.

4.38 If it was not for regeneration activity and major intervention, it is forecast that total employment (labour demand) in Hastings would grow by very modest amounts. Labour demand forecasts suggest that jobs growth will be in mainly public services, including public administration, health and educational sectors. This reflects their important share of employment currently and ignores the considerable regeneration activity which has already seen the successful development of educational, media and eco-industries. It also clearly highlights the need to diversify the town's economic base and a key objective of increasing the supply and range of job opportunities across the town, as part of achieving a more sustainable pattern of development and activity. Our aim is to maintain and strengthen the provision for those sectors where we have particular strengths such as manufacturing and specialist engineering businesses. Examples of which are vacuum pumps and contact lens manufacture. We will also support cultural and artistic ventures. Sectors, and particularly high value sectors, which we would like to grow, include knowledge-based sectors such as eco-industries and creative media.

4.39 It is clear that the provision of employment land and premises needs to be supported by an array of other interventions to succeed. As well as the Council's own commitment to fostering economic activity, there are multi-agency efforts (more fully documented in the ESLR) centred around investment in education and training; business support services; promotional activity; planned investment in transport infrastructure and ICT connections.

Business land and premises

4.40 Major improvements in the town's economy are needed if we are to achieve regeneration benefits for everyone. The Planning Strategy will assist in this process by ensuring that sufficient land is identified for employment purposes to allow for future growth in jobs and to encourage business investment by providing choice in the types and locations of employment premises. The amount of land identified should provide for employment growth that at least matches workforce growth, allows for higher levels of economic activity and reduces reliance on out-commuting.

4.41 The ESLR concluded that in order to meet the economic regeneration objectives for Hastings and Rother, provision should be made in Hastings for between 65,000 and 70,000m^2 of employment floorspace between 2008 and 2028. This target primarily relates to business accommodation[14].

POLICY DS2: Employment Growth

To support the town's role as a major employment centre and as the focus for economic regeneration, local economic growth and diversification will be met through the development of up to 70,000m^2 of employment floorspace between 2008 and 2028 and will be achieved by:

- **the continuing development of new office based employment opportunities at Priory Quarter in Hastings town centre;**
- **the development of Enviro21 Innovation parks in the Queensway Employment Corridor, circa 15,300m^2**
- **the development of circa 32,800m^2 of floorspace on existing employment areas across the Borough by 2028 at the following locations: Churchfields, Castleham, Ponswood, West Ridge and Ivyhouse Lane**
- **encouraging the renewal of the existing older stock of employment premises through the implementation of an employment land and premises protection policy**
- **encouraging the provision of live/work units within housing developments**

Relationship with North East Bexhill

4.42 The regeneration of Hastings also needs to be considered in the context of the impact of development outside of the town, and in particular, the North East Bexhill proposal in Rother District. This is a major development area aiming to provide some 50,000m² of commercial development. It has the scope to meet the needs of both local and in-moving occupiers. The available land at North East Bexhill plays a complementary role to that of Hastings as an employment centre by providing opportunities for employment development as part of an urban extension on a scale not possible within the constrained urban area of Hastings.

4.43 North East Bexhill represents one of the most important new land releases within the Hastings travel to work area. However its implementation is dependent on the completion of the proposed Hastings–Bexhill Link Road. There are other important opportunities for business development within the Borough, notably Priory Quarter and the Queensway area. Nevertheless, whilst the identified employment land commitments in Hastings are not dependent on the implementation of the road scheme per se, any delays in its progress to completion would have a negative impact on those proposals too, due to:

a) the knock-back to business confidence
b) the reduced scale and range of investment that Hastings and Bexhill could accommodate, would constrain the potential of the are for regeneration.

iv) Shopping

New retail development

4.44 National planning policy requires us to promote the vitality and viability of town centres, and emphasises that it is important that retail needs are met in full, and not compromised by limited site availability. It sets out that town centre sites should be identified first, and if these are not suitable or viable, edge of centre sites should be considered next, and then other accessible locations.

4.45 Later in this plan, policy E3, sets out a hierarchy of commercial centres where retail and employment opportunities are concentrated, to be protected and appropriate new ventures welcomed.

What does the evidence show?

4.46 In 2006, a study on the retail needs of the town up to 2021 was first prepared, which was then updated in both 2010 and 2011. The Retail Study now looks ahead to 2028, taking account of updated forecasts and projections. Combined together, these three studies identify a number of issues related to the provision of new retail floorspace in the town:

a) The vast majority of retail floorspace need will be for comparison goods (includes items purchased on a non-frequent basis, such as clothing, footwear, household and recreation goods).
b) In order to retain its market share, Hastings Town Centre needs up to approximately 20,500m² of additional comparison goods floorspace in the period 2014 to 2028. This is a gross figure (i.e. it includes sales space, storage and ancillary space) and an allowance for related service trade shops (e.g. restaurants, coffee bars, hairdressers etc).
c) If this scale of development does not take place in Hastings Town Centre, the town's position in the regional shopping hierarchy will deteriorate. Immediate competitors such as Eastbourne and Tunbridge Wells will absorb an even greater share of the spending of Hastings and Bexhill residents.
d) The need for additional convenience goods floorspace (everyday essential items including food, drink, newspapers, confectionery) will be minimal.
e) The need for retail warehouse floorspace (electrical, DIY, furniture etc) between 2014 and 2028 would be approximately 2,800m² gross. Floorspace need prior to 2014 has been more than satisfied with the construction of Wickes store at Ravenside
f) There could be up to 1,600 jobs from the growth of retailing up to 2028, if all the retail capacity identified in the study is met.

4.47 Whilst there is no immediate need for this additional retail floorspace, it is essential that it is provided for over the Planning Strategy period, up to 2028. We have therefore undertaken an initial assessment of sites, to determine the potential in Hastings Town Centre to accommodate this level of growth. This revealed only a small number of infill sites that could potentially provide additional floorspace, but not on the scale required.

4.48 As a result, the uncertainty over a potential town centre location for this level of retail development has meant that we are unable to identify a particular site at this time. A new town centre boundary where such development will be supported will be identified on the Proposals Map prepared as part of the Development Management Plan process. It will therefore be down to market forces to determine when, and if, the economic situation is right for this scale of retail development.

4.49 Policy DS3 below sets out a sustainable approach in that it would support the retail role of Hastings and St Leonards Town Centres. Both locations are more accessible by foot and by public transport than out-of-centre locations, and would generate prime shopping frontage and meet the needs of retailers.

Retail warehousing

4.50 The retail study also identified a requirement for further land for retail warehousing. We do not believe a suitable town centre site for retail warehousing is available. We will therefore adopt a sequential approach to site selection as required by government guidance. In particular, suitable sites should be accessible by means other than by car.

POLICY DS3: Location of Retail Development

The retail need for new comparison goods floorspace is estimated to be 20,500m² for the period 2014 -2028. This need is to be met primarily within Hastings Town Centre.

The Hastings Town Centre development will be undertaken primarily by the private sector, but the Council could use its compulsory purchase powers to assist in land assembly if appropriate. The development will be phased to occur in the period 2014 to 2028. Retail development will be supported on sites within or well related to the established shopping area of the town centre. If for any reason this retail need cannot be accommodated in the town centre, then the Council will pursue a sequential approach to site selection, looking first for potential sites on the edge of the town centre or at the district centres, including St Leonards, and then at out-of-centre sites that are in accessible locations.

2,800m² of retail warehousing needs for the period 2014 to 2028 will be met on edge-of-centre sites or out-of-centre sites, which are well served by a choice of means of transport.

Site identification for both comparison goods and retail warehousing will be undertaken as part of the Development Management Plan.