

Chapter 8 - Town and District Centres

Primary and Secondary Frontages E04										
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Bramley	Ian	202	Ravenside Investments (Land Securities)	Gary Morris - WYG GROUP	Object	Policy does not conform with NPPF and does not work for Westwood Cross Town Centre as it would permit competing retail offers across wide swathes of 'secondary' areas (retail parks).	Primary and Secondary Frontages are no longer advocated in NPPF, and the Council's approach to allocating all the retail parks at Westwood Cross as 'secondary frontages' effectively supports a full range of potential retail stores as well as other Main Town Centre Uses in non central locations. This would compete with the town centre and be detrimental to its vitality and viability. Please see attached explanation and suggested change to policy.	628	Ravenside Investments - Regulation 19 Consultation Response Policy E04.docx (872 KB)	Web
CD10 Properties Limited		494	CD10 Properties Limited	Burnett Planning - Burnett Planning	Object	To be consistent with Policy SP07 and Policy EDS and with regard to the definition of Primary and Secondary Frontages at Westwood as currently identified in the draft Policies Map, the final paragraph of the Policy should be amended to state; "Within the Secondary Frontages the uses referred to in the preceding clause 1 and clause 2 above will be permitted. as well as All other main town centre uses stated in the National Planning Policy Framework including hotels and residential will be permitted where this would not fragment or erode the commercial frontages to a degree that compromises footfall or otherwise undermines the function of the centre.	To be consistent with Policy SP07 and Policy EDS and with regard to the definition of Primary and Secondary Frontages at Westwood as currently identified in the draft Policies Map, the final paragraph of the Policy should be amended to state; "Within the Secondary Frontages the uses referred to in [delete "the preceding"] clause 1 and clause 2 above will be permitted. [delete "as well as"] All other main town centre uses stated in the National Planning Policy Framework [delete "including hotels"] and residential will be permitted where this would not fragment or erode the commercial frontages to a degree that compromises footfall or otherwise undermines the function of the centre.	1378		Email
Dunn	Danielle	499	Broadstairs & St.Peter's Town Council		Object	Policy E04 has not taken into account our previous comment. A full town centre's office / service uses (hairdressing, banks, estate agents, financial services, insurance etc.) should NOT be permitted on the same basis at Westwood as at the older town centres, such as		1398		Email

						<p>Broadstairs and St. Peter's.</p> <p>If these uses are generally permitted in Westwood in the same way that they are permitted in pre-existing town centres, this will further harm Broadstairs, Margate and Ramsgate.</p> <p>If such uses are permitted, strong safeguards need to be put in place to mitigate any adverse effects on the pre-existing towns.</p>			
Solly	C	419			Support	<p>No reference to Cliftonville for which was a primary area for commercial shopping, the area does require regeneration and this can provide a economic benefit to the area which is greatly need. There are some brownfield sites which could provide extra parking. There is capacity in this area. This should be considered especially if Greenfield land is being used for new development.</p>	Consider Cliftonville to be included in this policy.	1243	Email

Sequential and Impact Test E05										
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
.		408	Tesco Stores Ltd	Mark Buxton - RPS	Object	<p>We object to the thresholds the Council is seeking to apply for applications for development that require an impact assessment and in particular the 1,000 sqm threshold for an urban area. Paragraph 26 of the 2012 NPPF states that the default threshold for requiring an impact assessment is set at 2,500 sqm. Whilst the NPPF does go on to state that a locally set threshold may be set, we object to Policy E05 as this does not provide any justification for why the threshold is set at 1,000 sqm.</p> <p>Additionally, we consider that the policy sentence <i>"for major schemes where the full impact will not be realised in five years, the impact should be assessed up to ten years from the time the application is made"</i> should be reviewed. Although this is referenced in the 2012 version of the NPPF this has been omitted from the 2018 version of the NPPF which indicates the direction of travel for the government in this regard; a position which will sustain over the Plan period.</p>	<p>Provide a full justification in the supporting text to Policy E03 for the application of a 1,000 sqm threshold or otherwise reword the policy to apply the default threshold, namely:</p> <p>"For applications for retail, leisure and office developments outside of town centres and which are not in accordance with an up-to-date Local Plan the following thresholds should be accompanied by an impact assessment:</p> <ul style="list-style-type: none"> • Urban area – 2,500 sqm" 	1181		Email
CD10 Properties Limited		494	CD10 Properties Limited	Burnett Planning - Burnett Planning	Object	<p>Support the inclusion of Westwood Gateway Retail Park and Westwood Retail Park within the designated Westwood Town Centre. To be consistent with the NPPF (paragraphs 86 and 87), Policy SP07 and Policy E04 (see separate representations on these policies) and with regard to the definition of Primary and Secondary Frontages at Westwood as currently identified in the draft Policies Map, the Policy should be amended to state;</p> <p>Proposals for main town centre uses should be located within the designated town centres of Margate, Ramsgate, Broadstairs and Westwood, as defined on the Policies Map comprising the primary and secondary frontages. Where this is not possible due to size, format and layout main town centre uses should be located on the edge of town centres or on employment land designated for flexible uses. Outside these areas applicants should demonstrate that there is no</p>	<p>Proposals for main town centre uses should be located within the designated town centres of Margate, Ramsgate, Broadstairs and Westwood, as defined on the Policies Map [Delete "comprising the primary and secondary frontages. Where this is not possible due to size, format and layout main town centre uses should be located on the edge of town centres or on employment land designated for flexible uses. Outside these areas applicants should demonstrate that there is no</p>	1380		Email

					<p>sequentially preferable location within the catchment of the proposed development; then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered . When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre.</p> <p>Applicants and the local planning authority should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.</p> <p>Applications for main town centre uses which are not in an existing centre development and are above the following thresholds should be accompanied by an impact assessment:</p> <p>1) Urban area - 1,000 square metres 2) Rural area - 280 square metres</p> <p>The impact assessment should include: the impact of the proposal on existing, committed and planned public and private investment in a town centre or town centres in the catchment area of the proposal; and the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment as applicable to the scale and nature of the scheme) area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.</p> <p>Applicants should demonstrate flexibility on issues such as format and scale and will be expected to provide the Council with Robust evidence of this.</p> <p>Where an application fails to satisfy the sequential test or is likely to have an adverse impact on one of more of the above factors it will should be refused.</p>	<p>given to accessible sites which are well connected to the town centre.</p> <p>Applicants and the local planning authority should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.</p> <p>Applications for main town centre uses which are not in an existing centre [delete "development"] and are above the following thresholds should be accompanied by an impact assessment:</p> <p>1) Urban area - 1,000 square metres 2) Rural area - 280 square metres</p> <p>The impact assessment should include: the impact of the proposal on existing, committed and planned public and private investment in a town centre or town centres in the catchment area of the proposal; and the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment as applicable to the scale and nature of the scheme) [delete "area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made. Applicants should demonstrate flexibility on issues such as format and scale and will be expected to provide the Council with Robust evidence of this."]</p> <p>Where an application fails to satisfy the sequential test or is likely to have an adverse impact on one of more of the above factors it [delete "will"] should be refused.</p>			
Dunn	Danielle	499	Broadstairs & St.Peter's	Object	Policy E05 has not taken into account our		1399		Email

			Town Council		<p>previous comment.</p> <p>Policy E05 requiring an impact test to be carried out for proposals to build a new store over a certain size: the size of store that triggers the impact test varies depending on where the proposed store will be located.</p> <p>Even a new store less than 1000 m2 at Westwood could adversely affect the existing retail centres (Broadstairs, etc).</p> <p>The threshold size for an impact test for new stores at Westwood should be lower than 1000 m2, and 500 m2 is suggested as reasonable.</p>				
Solly	C	419		Object	<p>No reference to Cliftonville for which was a primary area for commercial shopping, the area does require regeneration and this can provide a economic benefit to the area which is greatly need. There are some brownfield sites which could provide extra parking. There is capacity in this area. This should be considered especially if Greenfield land is being used for new development.</p>	Consider Cliftonville to be included in this policy.	1244		Email

District and Local Centres E06										
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Dunn	Danielle	499	Broadstairs & St.Peter's Town Council		Object	8.8 St. Peter's needs to be included as a District Centre. Does not include a list of local centres.		1400		Email
Simpson	Marlene	286			Support	The road structure to and through Westwood should be dual carriageway to accommodate all the vehicles that even now tail back more than half a mile during the day and even worse at weekends and rush hour! Westwood is now often a place to avoid or requires a long detour to avoid to get anywhere else; not one to travel to if it can be helped The Coastal Town Centres and District Centres need supporting over and above Westwood. The latter has been a disaster for the more localised places which has impacted so many small local businesses and their customers.	Support town centres and not Westwood Cross	835		Web
Solly	C	419			Object	As stated Cliftonville is a much larger area and should be considered under policy E04 and E05 Westbrook is should be consider under this policy.	Cliftonville should be considered under policy E04 and E05 Westbrook should be considered to be included in this policy.	1245		Email