

LIDO



The Lido, Margate, Kent
Feasibility Study
February 2018

-
Citi Nests Ltd
Lee Evans Partnership LLP



SITE LOCATION AERIAL

The Lido - Margate, Kent

Introduction

The Lido is a very prominent seafront site in Margate which has remained largely unused since 1978. For over a century it was one of the towns' principal attractions but now it is suffering disuse and decay.

Originally built as the Clifton Baths between 1824-28, it was at the forefront of commercialising the pursuit of sea bathing in the late Georgian period and the pioneering use of sea bathing machines.

Much of this unique and rare surviving fabric of the Clifton Baths remains intact within the later structures, which were carved out from, and extended, the cliff line. We consider them to be of national significance but at risk of further damage and decay. For this important heritage asset of the town to be preserved and maintained, we are proposing uses that would ensure its long term future.

Our design team is being led by our award winning heritage team as we believe the site's heritage is so significant to the history and development of Margate. A compelling mix of uses needs to be found to ensure the preservation of the heritage asset.

Purpose of this document

The purpose of this document is to support an early pre-application enquiry to Thanet District Council for an exciting innovative mixed-use development of the Lido, which includes restoration of the surviving fabric of the Clifton Baths and their incorporation into a Spa Hotel, new apartment hotel and residential apartments together with associated parking and a sculpture park over it. We seek the Council's view of the form and type of development we propose prior to purchase of the site and development of a

detailed design. This is needed to reassure funders of the likelihood of obtaining consent for this exciting and novel development before the site is purchased.

The key issues for us are:-

1. Are the proposed uses acceptable?
2. Will the council support the form of the development including remodelling cliff line to build the development? To create a hotel with around 100 rooms and circa. 90 1-2 bed apartments. Anything less we doubt is viable.
3. Does the Council want to be a partner in the development if it could be extended onto their land where the Lido used to sit?

If the response from the Council is sufficiently positive to give our funders reassurance we would propose to enter into a Planning Partnership Development to develop the detailed design in close liaison with the Council's staff and Historic England as well as other interested parties.

The character of the lido makes it a special place in Margate. Largely hidden from view from Ethelbert Terrace, it's a place with subterranean secrets sat behind a cliff face development.

Our approach has been developed after a careful study of the site, its unique history and an analysis of the impacts of a development in front of the Clifton Conservation Area.

An iconic residential development of apartments would be built into the cliffs to the west of the site, echoing the layered balconies of the old Lido.

Above the hotel and apartment there would be a publicly accessible cliff top sculpture park. The entrances to the

apartments, car park and hotel as well as some hotel rooms would rise up into this park as low-rise features. Together with restored glass dome over the historic Clifton bath these features would appear as sculptural forms in their own right



Lido in Use (c.1900s)



Lido sign (Present)

INTRODUCTION

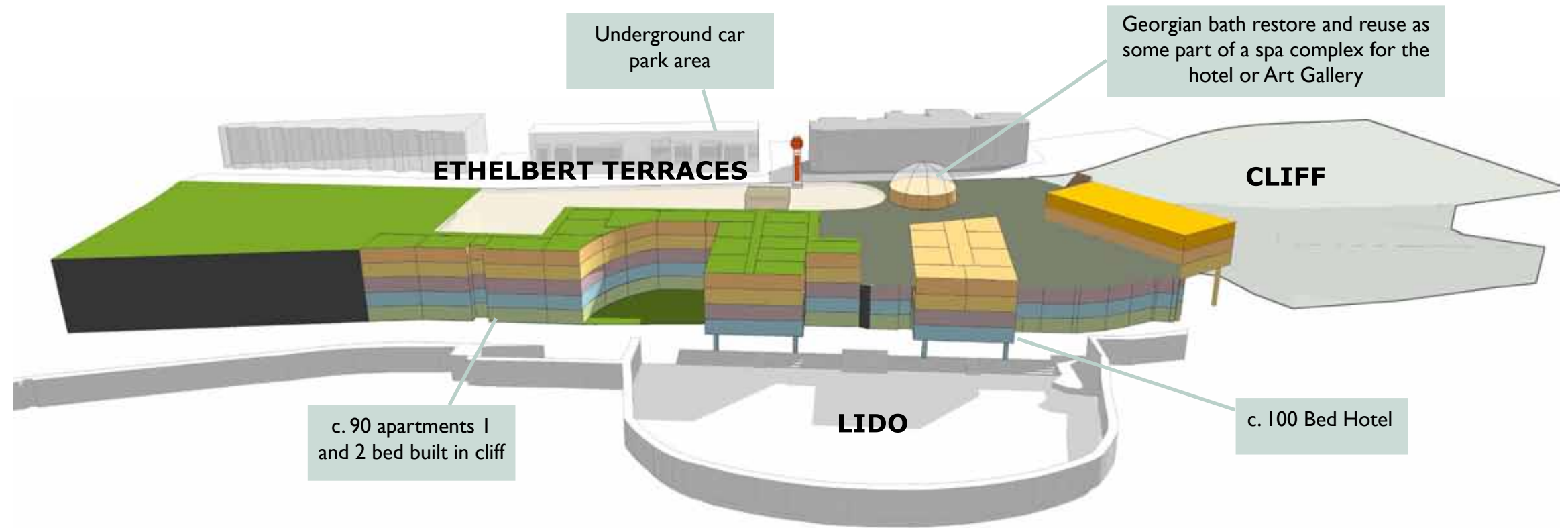
The Lido - Margate, Kent

Vision

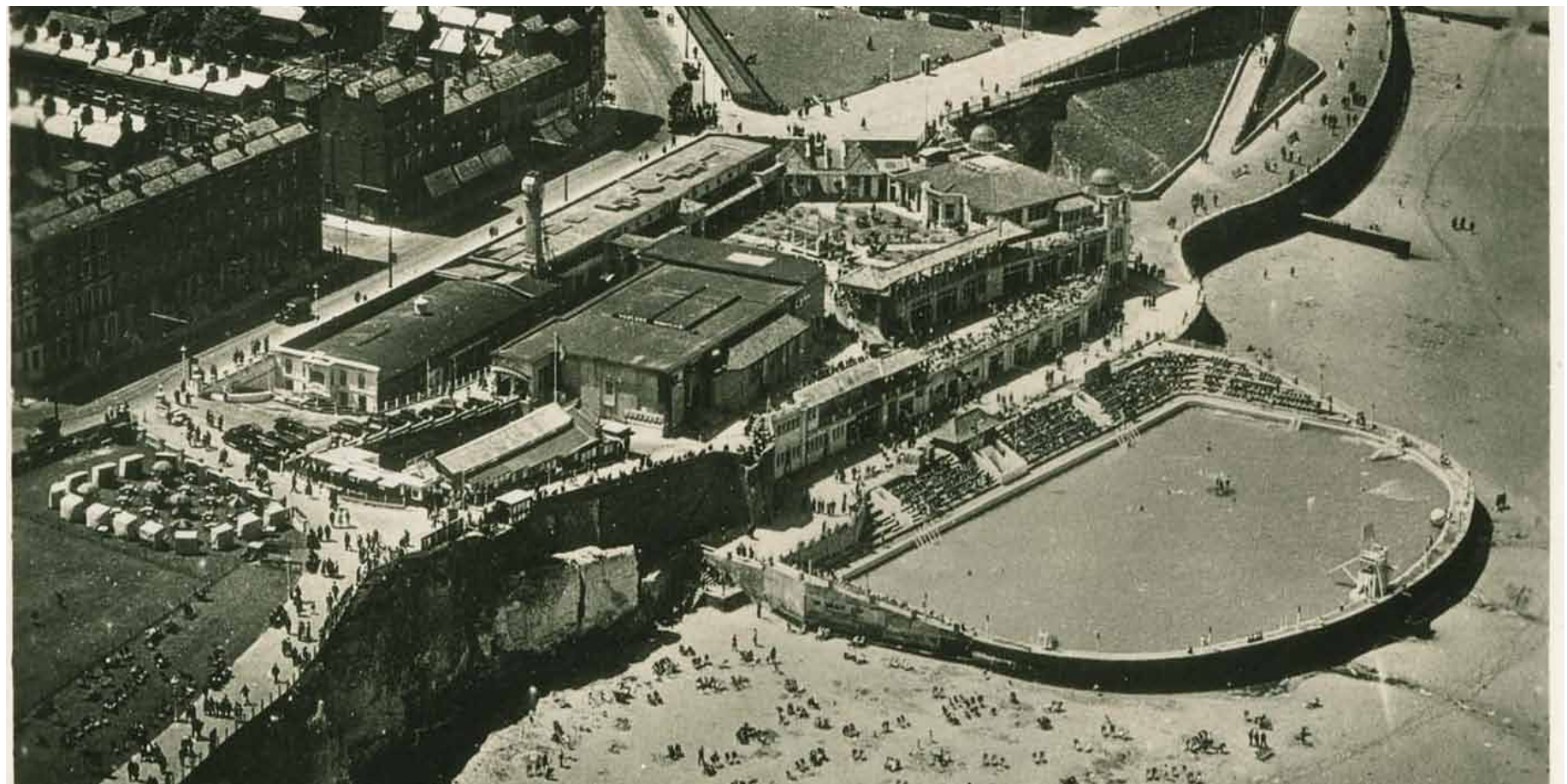
Our vision is to strip back the later developments on the site which overlay the historic Baths. Then we propose to recreate a modern spa hotel which re-uses the Clifton Baths as an integral part of its facilities, restoring its glass domed rotunda and internal sea bathing pool. The large boutique hotel would have restaurants, bars and function suite at the east end of the site. Life and economic activity would be brought to this pivotal coastal site within the town helping with the on-going regeneration of Cliftonville.

An iconic residential development of apartments built into the cliffs to the west of the site. Their form would echo the layered balconies of the old Lido.

Over the hotel and apartment roofs there would be a cliff top sculpture park with public access. The entrances to the apartments car park and hotel as well as some hotel rooms would need to rise above this sculpture garden, however these low rise features, together with restored glass dome over the historic Clifton bath would provide exciting architectural elements and back drops to the sculpture gardens.



3D Diagram showing extent of development



Views from Cliff Terrace/ Ethelbert Terrace

VISION

The Lido - Margate, Kent



Spirit of the Lido

The Lido site has a very distinct character and sense of place, which we are seeking to retain and enhance. It's a place not normally seen from land and surrounding streets in Cliftonville. To appreciate it fully you need to stand out on the old Lido or be at sea. The old Clifton baths are a unique survival of Georgian bathing history. They have a special character; a hidden subterranean and currently secret world inside the 1920s Lido. They are generally robust and we want to explore their use as possibly:-

- Museum space - with light restoration
- Spa for the hotel - could the sea bathing pool be re-opened?
- Art space - could compliment the unique atmosphere of the tunnels?
- Bar space - there used to be a bar in the rotunda - could it be restored?

The Lido was one of the town's key attractions, which form a chain from The Royal Sea Bathing Hospital across the seafront to the Lido. The coastline at the Lido has evolved over the last 150 years and now is largely man-made. Re-modelling it further now, to achieve its potential, would be part of a long tradition. The Lido was developed over time as a series of seaward-facing facilities and terraces. Baths, changing rooms, nightclubs, bars, restaurants, theatres, drill halls, and cafes were carved into the cliff or built out from them.

We propose to create a new exciting development which continues this historic form of cliff side development and ensures the maintenance of the historic views from the road above the site. This is a different approach to other proposals, which have been proposed for the site in the last few decades where high-rise developments obscured some of the views of local residents. Our proposal would provide a unique spa hotel boosting the hotel bed-spaces in the town, which should help to encourage conferences and exhibitions to come to Thanet. Together with the apartment hotel, the aim is to encourage more visitors to the area. A new hotel close to the Winter Gardens may encourage larger conferences to the town so it can compete against towns like Brighton and Blackpool.

A PLACE NOT NORMALLY SEEN FROM LAND

SPIRIT OF THE LIDO

The Lido - Margate, Kent



Sea Bathing Pool



Old Classroom Tunnel



Underground Harbour tunnel



Underground Harbour Tunnel



Misty's Tunnel

The old Clifton baths are a unique survival of Georgian Bathing history. They have a special character, hidden subterranean and currently secret world hidden in the 1920s Lido.

They are generally robust - we want to explore their use as possibly:-

- Museum space - with light restoration
- Spa for the hotel - could the sea bathing pool be re-opened?
- Art display space - could art line the tunnels?
- Bar space - there used to be a bar in the rotunda - could it be restored?

A PLACE WITH HIDDEN HISTORY, A SUBTERRANEAN SECRET WORLD SAT BEHIND CLIFF TERRACES

A PLACE OF SECRETS AND TUNNELS

The Lido - Margate, Kent

The Lido was one of the towns key attractions, which form a chain from The Royal Sea Bathing Hospital accross the seafront to the lido.

Placing an up market hotel at the sea edge in Cliftonville would help regeneration in the area and help support activities such as conferences at the Winter Gardens



A SEASIDE ATTRACTION FOR MARGATE

The Lido - Margate, Kent

The Lido is a pivotal site sitting at the junction of the lower seaside Newgate promenade and the higher clifftop paths. It's a site which could act as a place where you could move from high to low. We would explore this in our full design.



COAST MEETS CLIFF - A place that transitions from high to low, a route from Cliftonville to the coast

A PLACE WHERE PATHS MEET

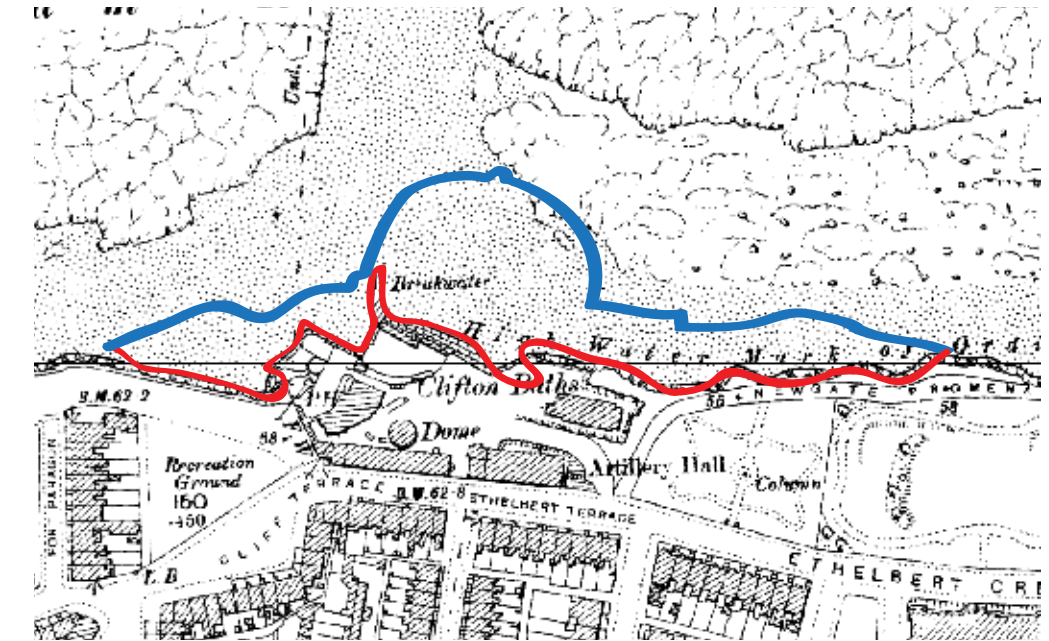
The Lido - Margate, Kent

The coastline at the Lido has changed over the last 150 years and now is largely man-made.

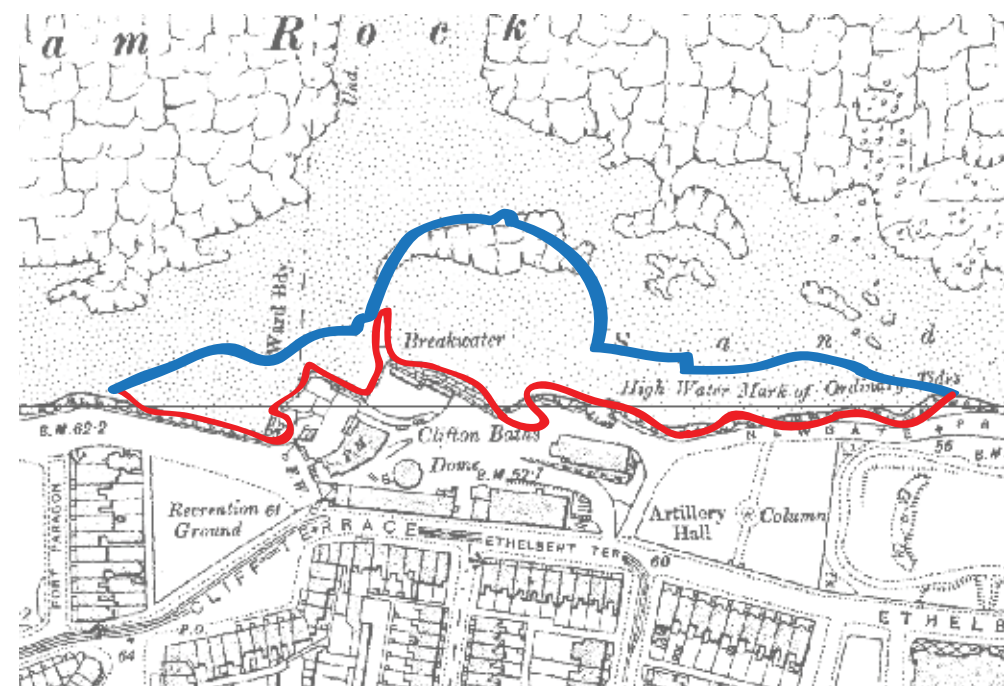
Re-modelling it again would be part of a long tradition



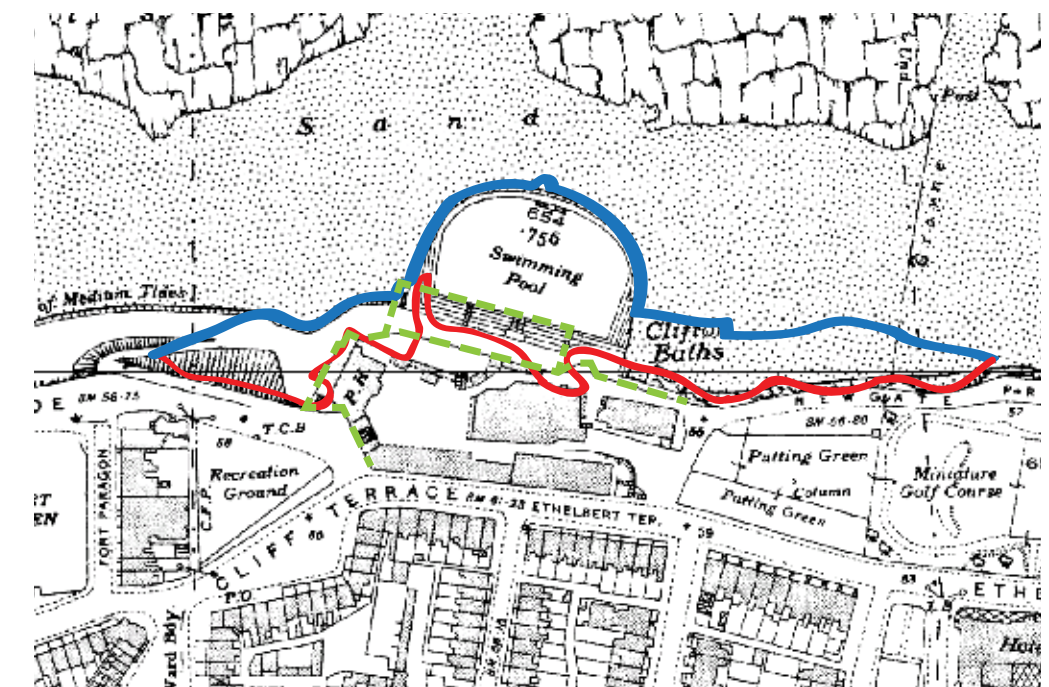
1872



1896



1907



1936 - onwards

- Original Coastline
- Present Coastline
- Modified Coast

A MANMADE COASTLINE

The Lido - Margate, Kent

1824

1824-8

Clifton baths were constructed by John Boys with a total cost of £15,000, excavated from the chalk cliffs North-east along the harbour.

1831

Bathers Terrace was erected in order to facilitate the overused bathing machines, allowing the occupants to wait in comfort, before travelling through the tunnels towards the beach.

1902

Seperate male and female bathing rooms were introduced.

1926

Lido was established. This included redevelopment over several levels and a new outdoor open swimming pool. Electricity is also introduced to the ozone baths.

1938

Name changed from the Clifton Baths to Clifton Lido.

1953

February storms flooded most of the East coast of Margate, damaging parts of Clifton lido.

1978

Further damage by storms and a decline in popularity lead to the full closure of the lido facilities.

1978

History

The Canterbury Archaeological Trust have undertaken 2 studies of the site from which we have sourced most of the following history.

The Clifton Baths were constructed between 1824-28 by John Boys at a cost of £15000, excavated from the chalk cliff northeast of Margate harbour. The Gothick style exterior of flint and stone, this comprised a circular chamber for the storage of bathing machines with eight alcoves from which passages lead off to the east, west and northwest and a further passage, leading off the north side of the northwest passage, leads down to the large rectangular Lower Reservoir designed as a plunge bath for females and children. The original site was mainly overbuilt by buildings of the Cliftonville Lido, constructed from 1926 onwards. This redevelopment removed the glazed dome originally present on the top of the cliff. The remaining features of the Clifton Baths are below ground level, excavated out of the chalk cliffs, lined in brick or chalk blocks with some knapped flint visible. Areas of the sites redevelopment have overlayed the original masnry and chalk leaving much of the 19th Century fabric intact. Comprises a circular chamber for the storage of bathing machines with eight alcoves from which passages lead off to the east, west and northwest and a further passage, leading off the north side of the northwest passage, leads down to the large rectangular Lower Reservoir designed as a plunge bath for females and children.

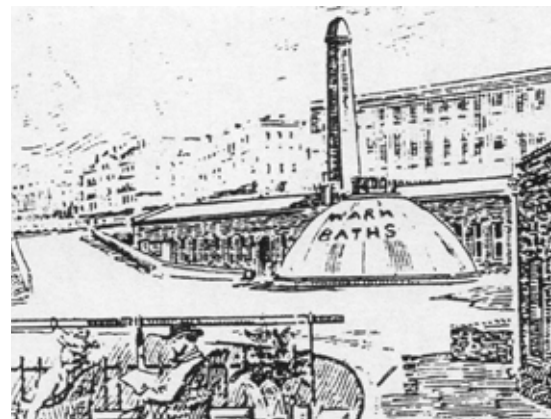
Development between 1824 - 1926

The circular chamber is brick lined in Flemish bond and is 42 feet (12.8m) in diameter with eight round-headed arches with a thin brick string course at impost level and alcoves, some lined with chalk blocks, in which bathing machines were stored. The floor was constructed about ten feet (3m) above high water level. The circular shape made it easier for turning horses. Originally there was a domed roof 33 feet (10m) high which protruded above ground level. From the eastern alcove a wide chalk block lined tunnel with vaulted roof about 100 feet (30.5m) in length, 13 feet (3.96m) high and 10 feet (3m) wide, lead to the beach and was used for bringing bathing machines to and from the beach pulled by horses. The mouth of the Bathing Machine Tunnel is now blocked and the original opening can be seen in the French Bar of the later Cliftonville Lido, which also preserves the flint revetment wall of the Bather's Terrace of the Clifton Baths.

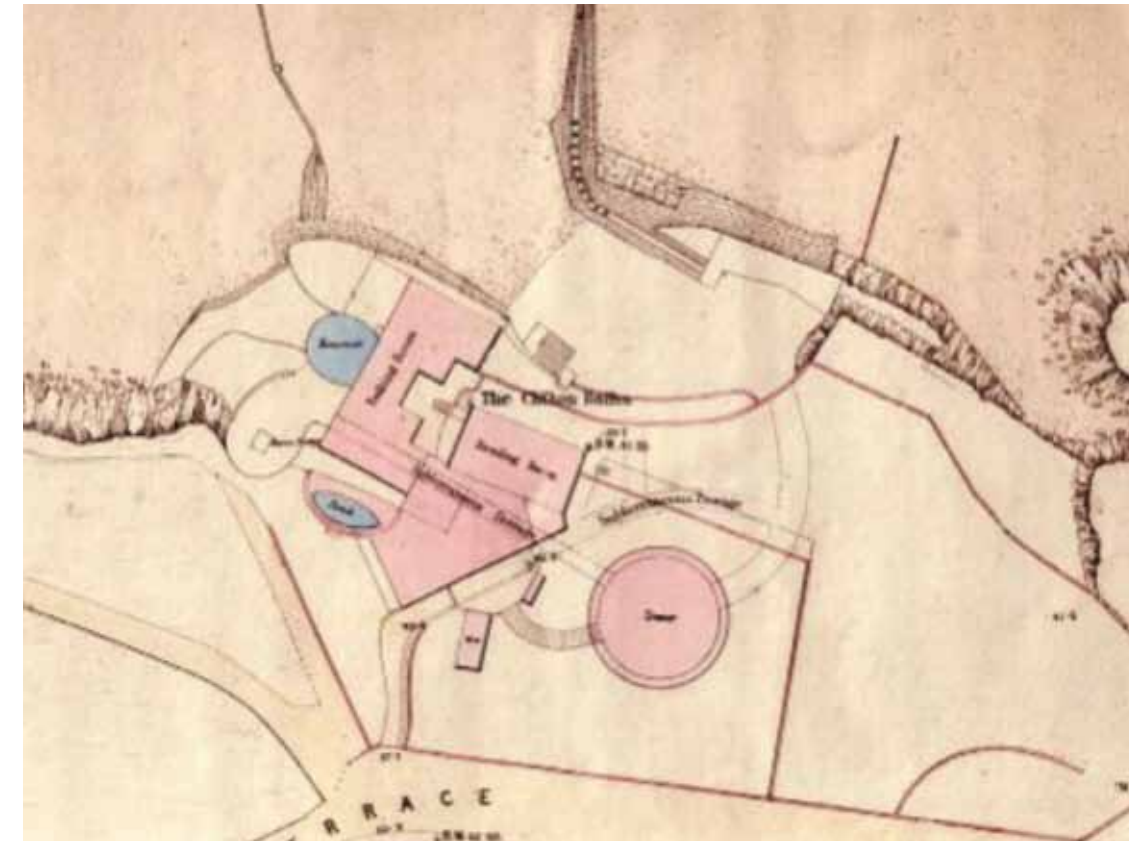
Halfway along the Bathing Machine Tunnel a straight tunnel, the entrance tunnel, leads west. This was used by both staff and patrons and was wide enough for small vehicles. Only the curving lower portion is currently accessible, the rest cut off by C20



Bacon's map of Margate, 1875; based on First Edition Ordnance Survey.



Engraving from a guide of c.1896. Note the top of the subterranean 'dome'.



Margate Sanitation Survey of 1852. Showing the original layout of the Clifton Baths, except that the cliff terraces altered with a new staircase down to the artificial bay,

HISTORY

The Lido - Margate, Kent

alterations. From the west alcove a curved Staircase Tunnel constructed of chalk-block walls with segmental brick vaulted roof with 34 steps provided access to ground level for foot passengers and survives in a mutilated condition. At the north-west end a straight Horse Pump Tunnel 120 feet (36.5m), long lined in brick with some knapped flints, communicated with the horse pump supplying sea water from the lower reservoir to the upper reservoir. Almost immediately in the northern wall of the Horse Pump Tunnel is a further narrower curved brick lined tunnel, called the Reservoir Tunnel, leading to the Lower Reservoir.

The Lower Reservoir is a rectangular vaulted chamber about 80 feet (24.4m) long by about eighteen feet (5.5m) wide, slightly wider at the outward northwestern end and with a rounded eastern end and originally open to the air at the far end through a huge archway. The reservoir was cut directly into the chalk with a high semi-circular vault of large chalk blocks but the south-west wall has been extensively revetted in brick. It is thought that the reservoir walls were originally lined to a certain height with cement. A wide blocked cambered arch to the exterior is now visible in the Jolly Tar Tavern of the Cliftonville Lido. It is possible that John Boys' "self-acting valves" or other features may survive within the brick-lined apron at the north west end. Other features of the Clifton Baths may survive beneath 1920s and later structures of the Cliftonville Lido which were superimposed on the earlier fabric.

Margate was in the forefront of sea bathing in the C18 with bathers taken into the sea in simple carts before a fully developed bathing machine appeared there by 1753. This was ascribed to a Quaker, Benjamin Beale, who added a "modesty" hood to the rear of a bathing machine, enabling the bather to enter the sea unobserved and offering some protection from wind and

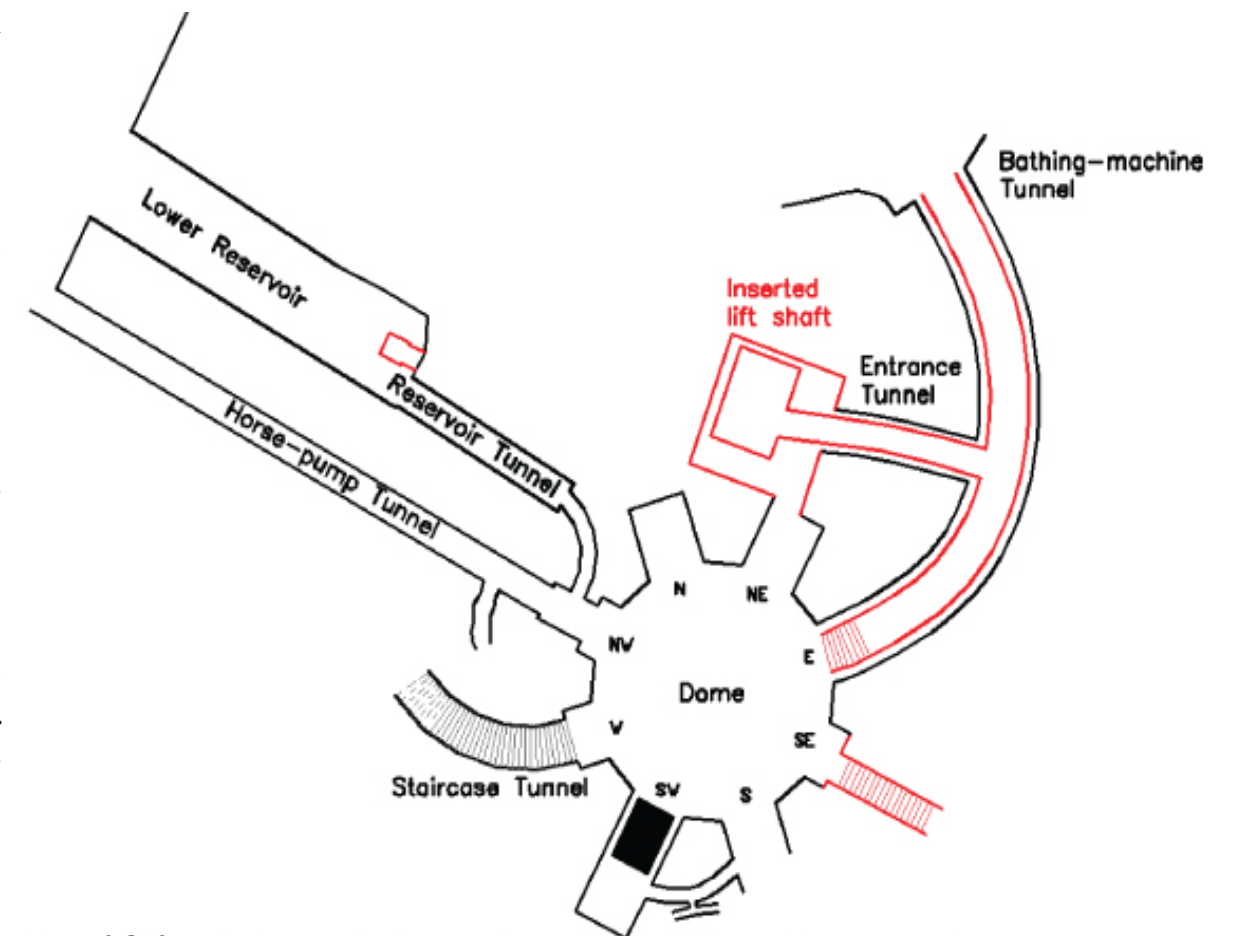
waves. By 1793 a guide to Margate speaks of 30 to 40 bathing machines in use at a time. Bathing rooms had been established at Margate in the 1750s to the south-west of the harbour, from which the bather descended an external staircase on the seaward side into a waiting bathing machine to enter the sea. In 1791 the Quaker physician John Coakley Lettsom established "The Margate Infirmary for the relief of the Poor whose Diseases require Sea-Bathing" which had its own bathing machines and later sea water baths.

A detailed description was published in 1830 by George Alexander Cooke, probably based on a visit three or four years earlier. A large dome provided storage for 20 to 30 bathing machines which were brought down a curving tunnel to sea level when required. A tunnel also led to the Lower Reservoir used as a plunge bath for women and children. A horse pump forced sea water from the Lower Reservoir to the Upper Reservoir where it supplied the water for the hot baths, the power supplied by a horse gin in the open air. An obelisk-shaped chimney served the boiler but was removed in the later C19. A Bathing Room divided into two wings, the north for gentlemen and the south for ladies, had seven hot baths, shower baths and hip baths but was later demolished. There was a waiting room which was also a reading and subscription room and a newsroom which had an organ and billiard table. The Upper Terrace had round-headed alcoves, seats and benches for enjoying the sea views. A bathers' terrace was erected by 1831. A second chimney was erected between 1833-45.

In 1849 ownership of the Clifton Baths passed to John Boys' son, John Harvey Boys. A map from the Margate Sanitation survey of 1852 shows the subterranean plan of the Clifton Baths with the circular dome, a passage leading off to the north-east, a

reading room, bathing room, reservoir, tank and horse pump and further subterranean passages. An engraving of circa 1860 shows a further obelisk-shaped chimney had been built by this date.

In 1869 the site was sold to Thomas Dalby Reeve who built a drill hall for the local Artillery Volunteers and a boiler house with tall chimney. These are shown on Bacon's map of Margate of 1875. In 1876 ozone baths were produced by an electrical process and in the 1880s an indoor salt water swimming pool was provided at the northeast corner of the site. This appears on the 1907 Ordnance Survey map and survived until the mid C20. By 1903 a cinema had been installed into the former Drill Hall which was operational until 1924. In 1924 a theatre or concert hall was built east of the indoor swimming pool but was later demolished.



Plan of Clifton Bath tunnels showing later unsympathetic additions in red.



19th C coloured photo of a carts o the beach with the bath buildings in the background with the buildings within the cliff.

HISTORY

The Lido - Margate, Kent

The original domed roof 33 feet (10m) high which protruded above ground level was truncated in the 1920s when the above ground lido buildings were built, and a concrete curved staircase and gallery were added after 1962 when the space was used as a nightclub. From the eastern alcove a wide chalk block lined tunnel with vaulted roof was blocked and the original opening can be seen in the French Bar of the later Cliftonville Lido, which also preserves the flint revetment wall of the Bather's Terrace of the Clifton Baths. Halfway along the Bathing Machine Tunnel a straight tunnel, the entrance tunnel, leads west. This was used by both staff and patrons and was wide enough for small vehicles. Only the curving lower portion is currently accessible, the rest cut off by C20 alterations. From the west alcove a curved Staircase Tunnel constructed of chalk-block walls with segmental brick vaulted roof with 34 steps provided access to ground level for foot passengers and survives in a mutilated condition.

The Lower Reservoir is a rectangular vaulted chamber cut directly into the chalk a wide blocked cambered arch to the exterior is now visible in the Jolly Tar Tavern of the Cliftonville Lido. It is possible that John Boys' "self-acting valves" or other features may survive within the brick-lined apron at the north west end. Other features of the Clifton Baths may survive beneath 1920s and later structures of the Cliftonville Lido which were superimposed on the earlier fabric.

By 1903 a cinema had been installed into the former Drill Hall which was operational until 1924. In 1924 a theatre or concert hall was built east of the indoor swimming pool but was later demolished. From 1926 onwards the Clifton Baths were re-modelled under John Henry Iles, a leading figure in the amusement park industry between the wars, who also owned the Dreamland Amusement Park in Margate. The site was turned into a large modern seaside complex with bars, cafes and restaurants on several levels and a large open air swimming pool projecting into the sea. These buildings were built onto and over the remaining parts of the Clifton Baths in a Neo-Classical style with Mediterranean influences, laid out over a series of terraces. From 1938 the name was changed from the Clifton Baths to the Cliftonville Lido.



Clifton Baths (1929)



Clifton Lido (1948)



Aerial Photograph



Concrete staircase and gallery added in the 1960's when the turning area was converted into a nightclub. Photo 2017.



Concrete staircase and gallery added in the 1960's when the turning area was converted into a nightclub. Photo 2017.

HISTORY

The Lido - Margate, Kent

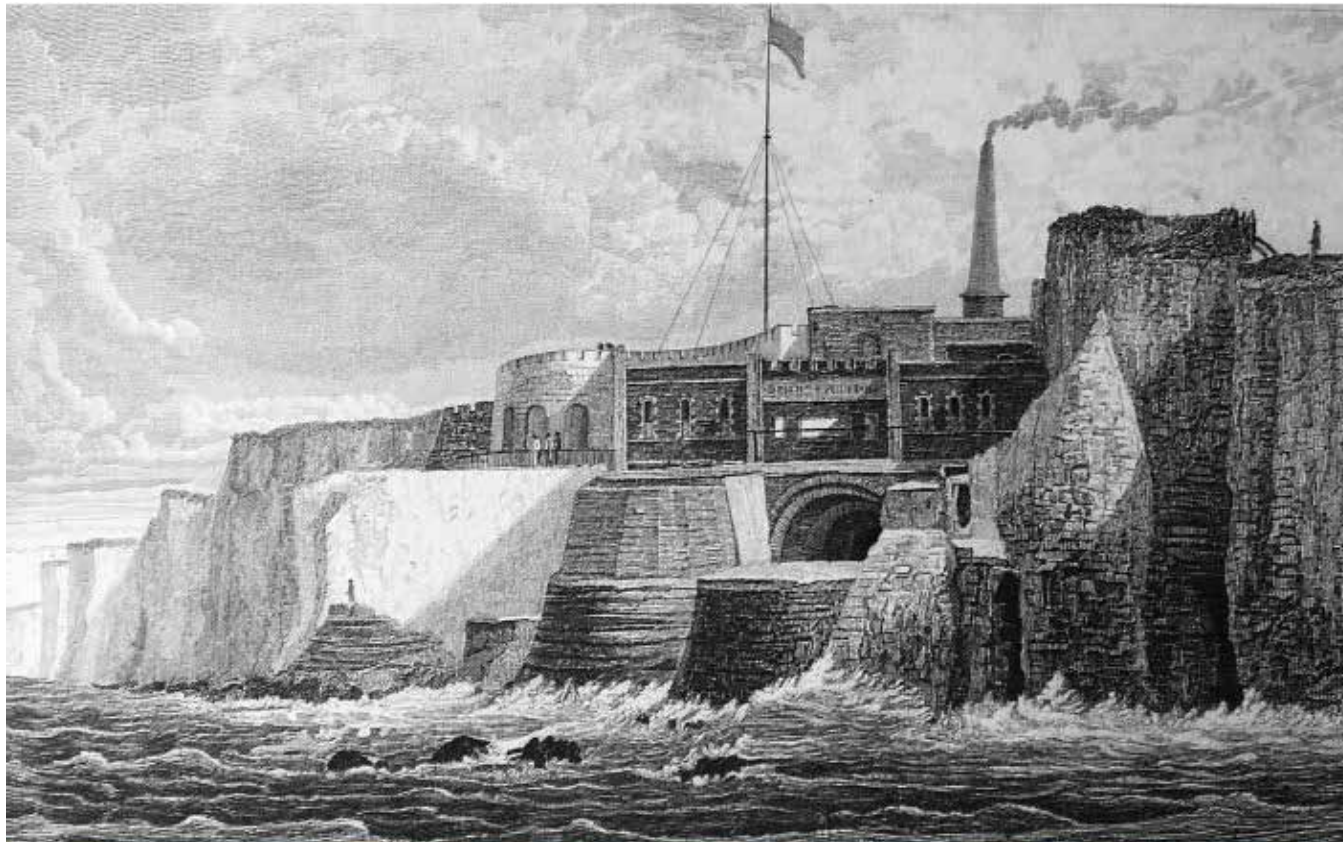


Fig. 8 The earliest known engraving of: 'The New Baths, Margate, Kent', drawn by George Shepherd; engraved by McClatchie; Published by George Virtue, 1829. The scene is at high tide.



Fig. 9 Engraving of about 1830, by William Bartlett (MLHM) – a more romantic view with rugged scenery and a stormy sea; the tide a little way out. A bathing machine is shown in the artificial bay. This is not quite as accurate a depiction as the last, but gives a better impression of the sea-defences. The Upper Terrace is misdrawn.

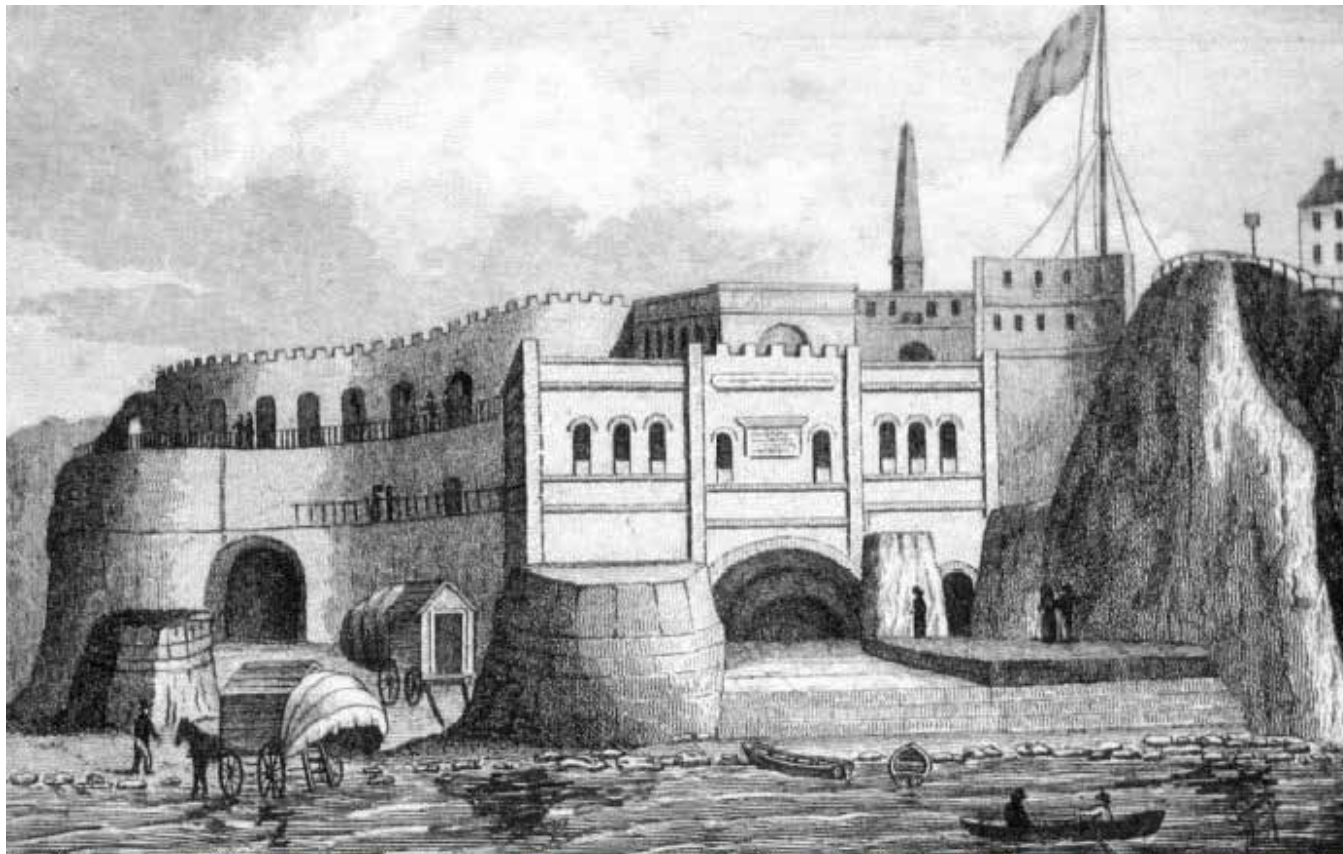
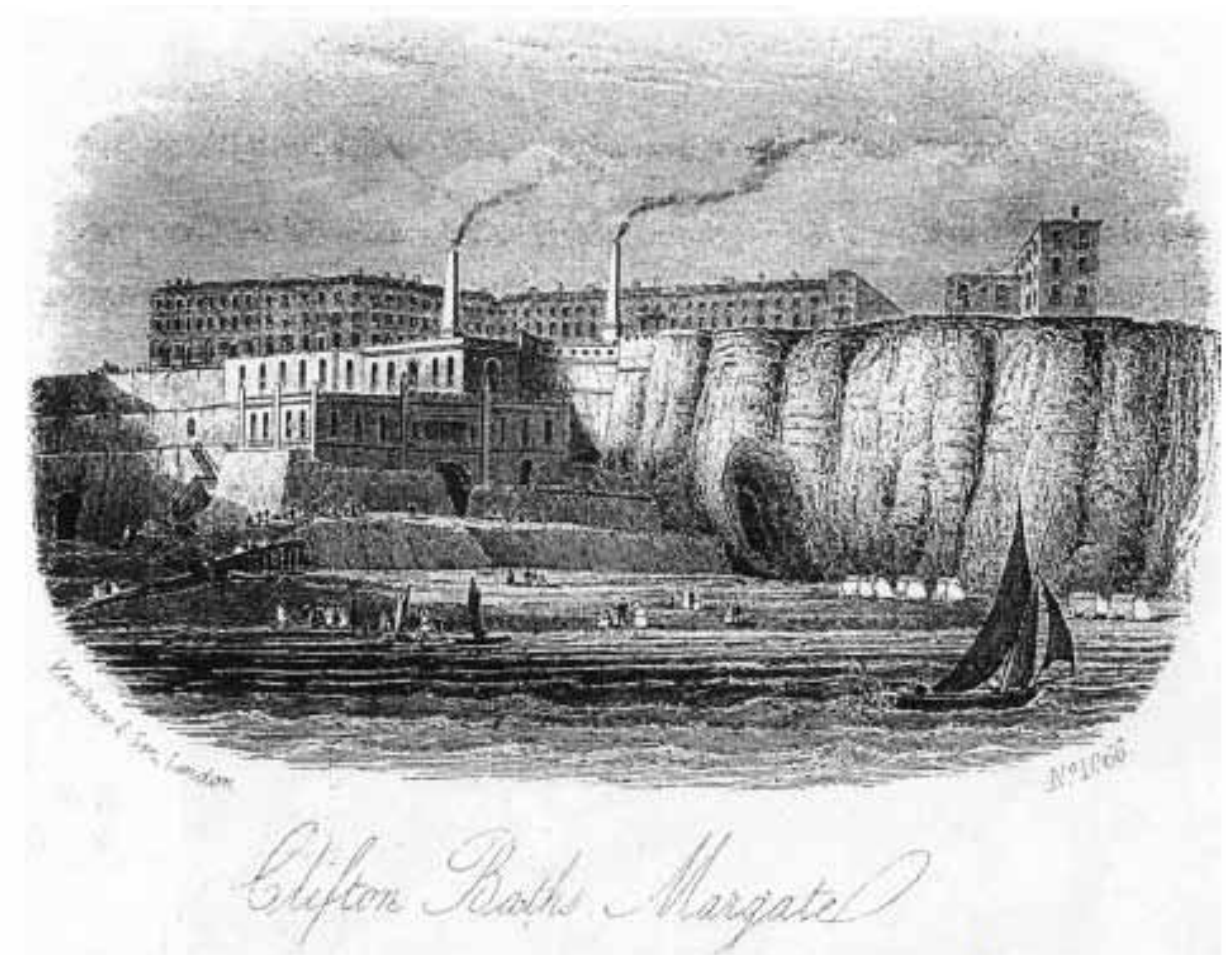


Fig. 10 Engraving of 1832 by J. Shury; this is quite naïve and diagrammatic but shows off the various features of the site more distinctly. Note that the Bathers' Terrace has now been added, half-way up the cliff-face.



HISTORY

The Lido - Margate, Kent

Form

Architecturally, the Lido and Clifton Baths were constructed by remodelling the coast line. They were built into and out from the historic cliff line and always maintained the views from the principle rooms in the Listed Ethelbert Terrace above them.

The Lido was developed over time as a series of seaward-facing facilities and terraces. Baths, changing rooms, nightclubs, bars, restaurants, theatres, drill halls, and cafes were carved into the cliff or built out from them. We propose to create a new exciting development which continues this historic form of cliff side development and ensures the maintenance of the historic views from the road above the site. This is a different approach to other proposals which have been proposed for the site in the last few decades where high rise developments obscured some of the views of local residents.

A boost to Cliftonville & Margate

The Lido was once a major engine of economic activity for Margate and Cliftonville and it could be once again.

Our proposal would provide a unique spa hotel boosting the hotel bed-spaces in the town, which should help to encourage conferences and exhibitions to Thanet. Together with the apartment hotel, the aims are to encourage more visitors to the area. A new hotel close to the Winter gardens may encourage larger conferences to the town so it can compete against towns like Brighton and Blackpool.

The uncertainty over the future of the Lido site has, we believe, in part blighted investment in the seaward facing buildings along the cliff top road through Cliftonville. There has been a risk for owners that

their sea views would be lost by a high rise development of the site. Council support of our proposals should give re-assurance to these owners to invest in their buildings and have a significant benefit in the on-going renewal of the town and its heritage.

A hotel on its own is not financially viable since the cost of the removal of the decayed building is very significant. It will take time to build trade, and the cost of the restoration of the baths is also to be accounted for. The provision of new apartments make the project viable.

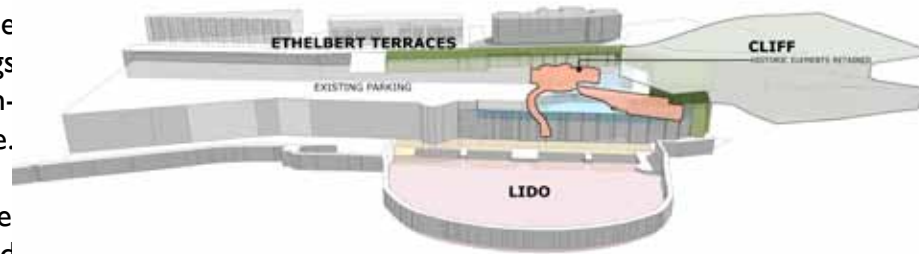
Art & Access

There would be relatively little development which rises above the level of the existing buildings. Where these do occur they will be treated as artful articulations of the horizon.

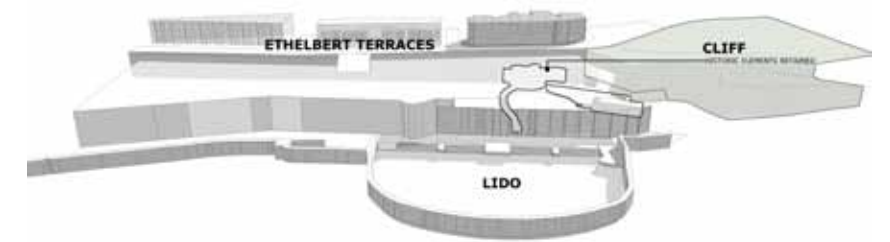
It is proposed to extend the promenade along the cliff edges in Cliftonville across the top level of the development and incorporating public art as a key feature, in a way that compliments spaces at Turner Contemporary.

Parking

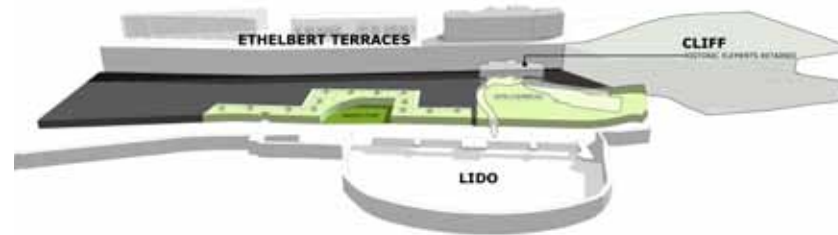
It will be necessary to create a new multi-level car park, excavated out of the chalk cliff by Ethelbert Terrace to serve the hotel and housing. Its location would avoid the tunnels of the Georgian Clifton Baths.



Existing Site



Existing Site - Demolished Areas



Proposed Site - Level 01



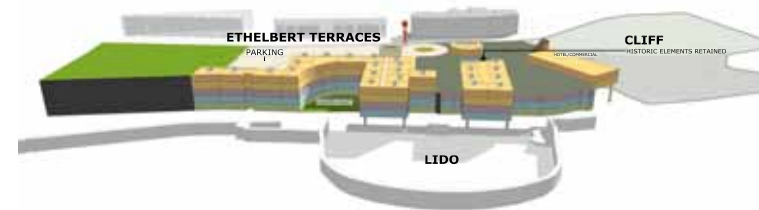
Proposed Site - Level 02



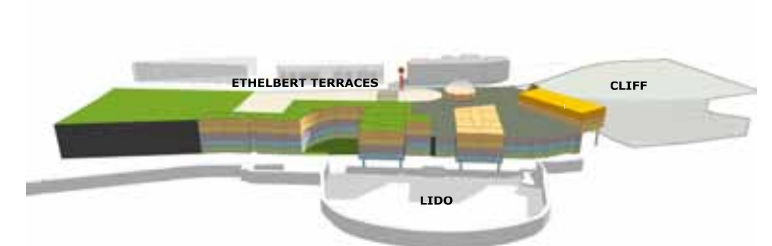
Proposed Site - Level 03



Proposed Site - Level 04



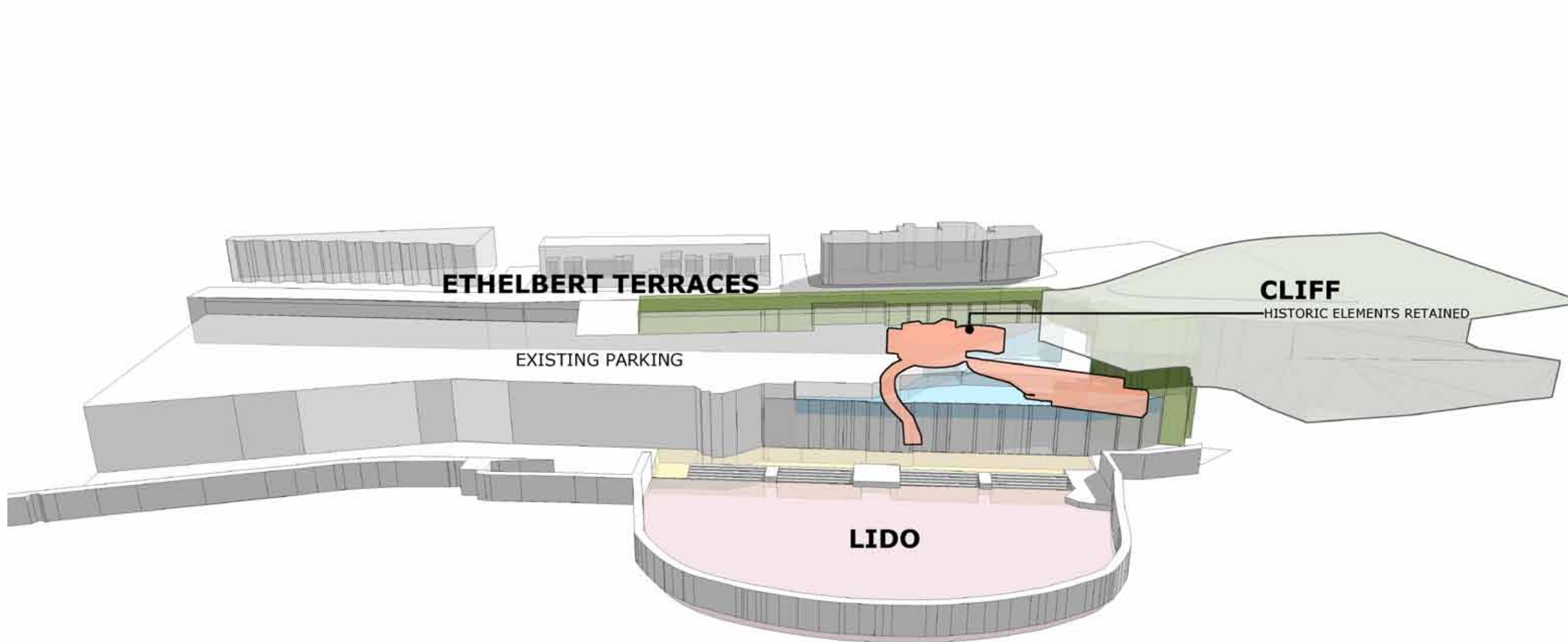
Proposed Site - Level 05



Proposed Site - Level 06

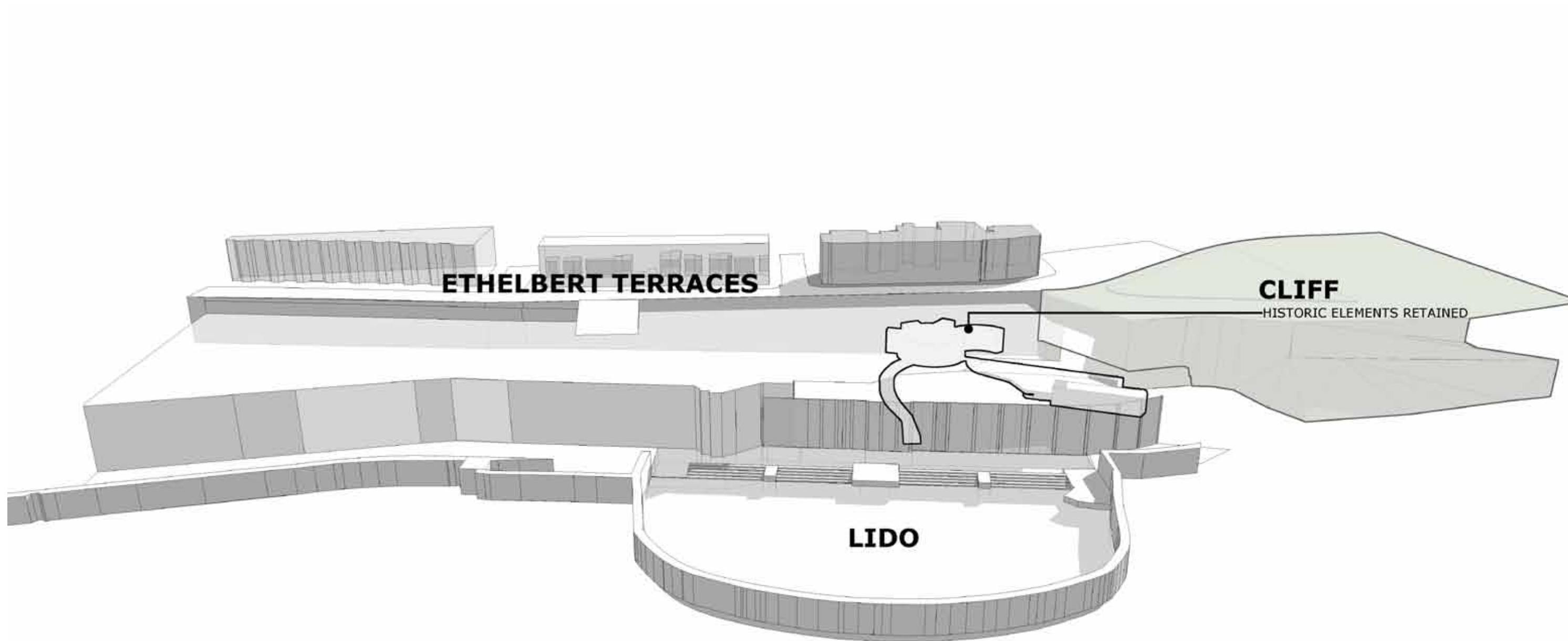
FORM OF DEVELOPMENT

The Lido - Margate, Kent



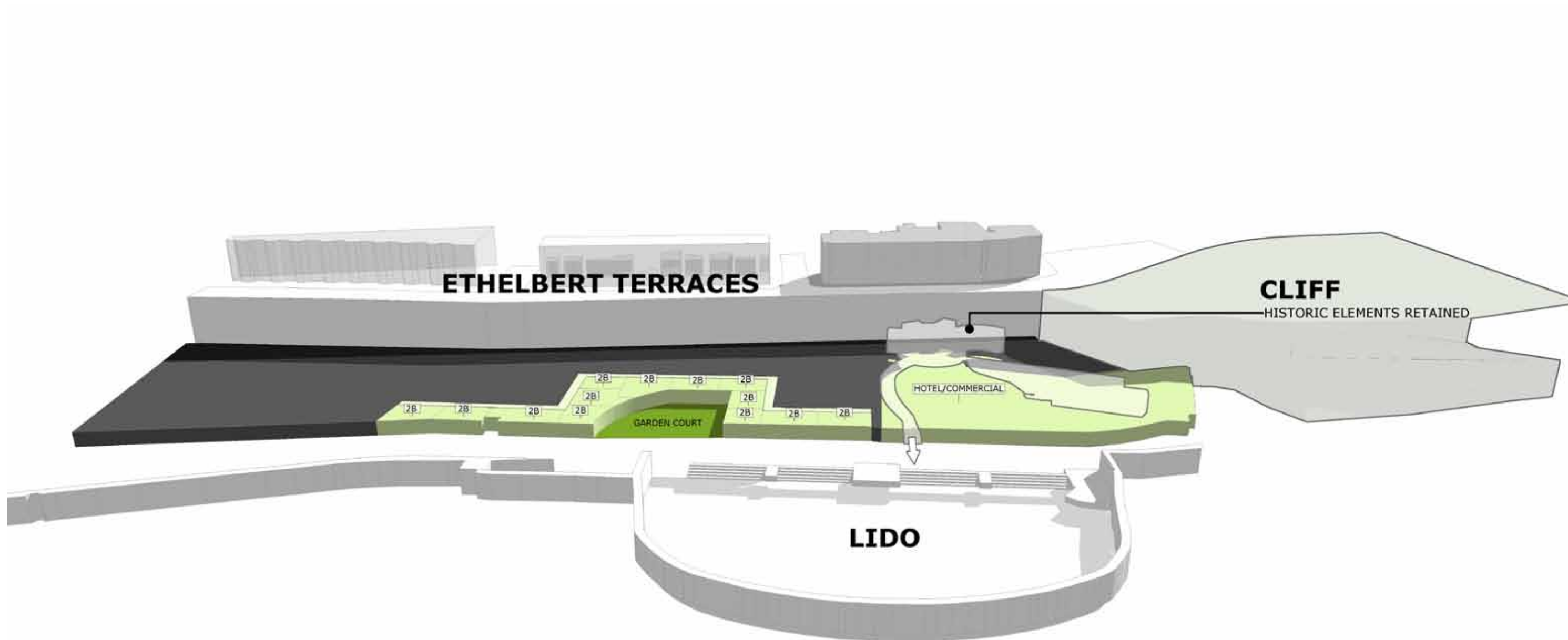
EXISTING SITE

The Lido - Margate, Kent



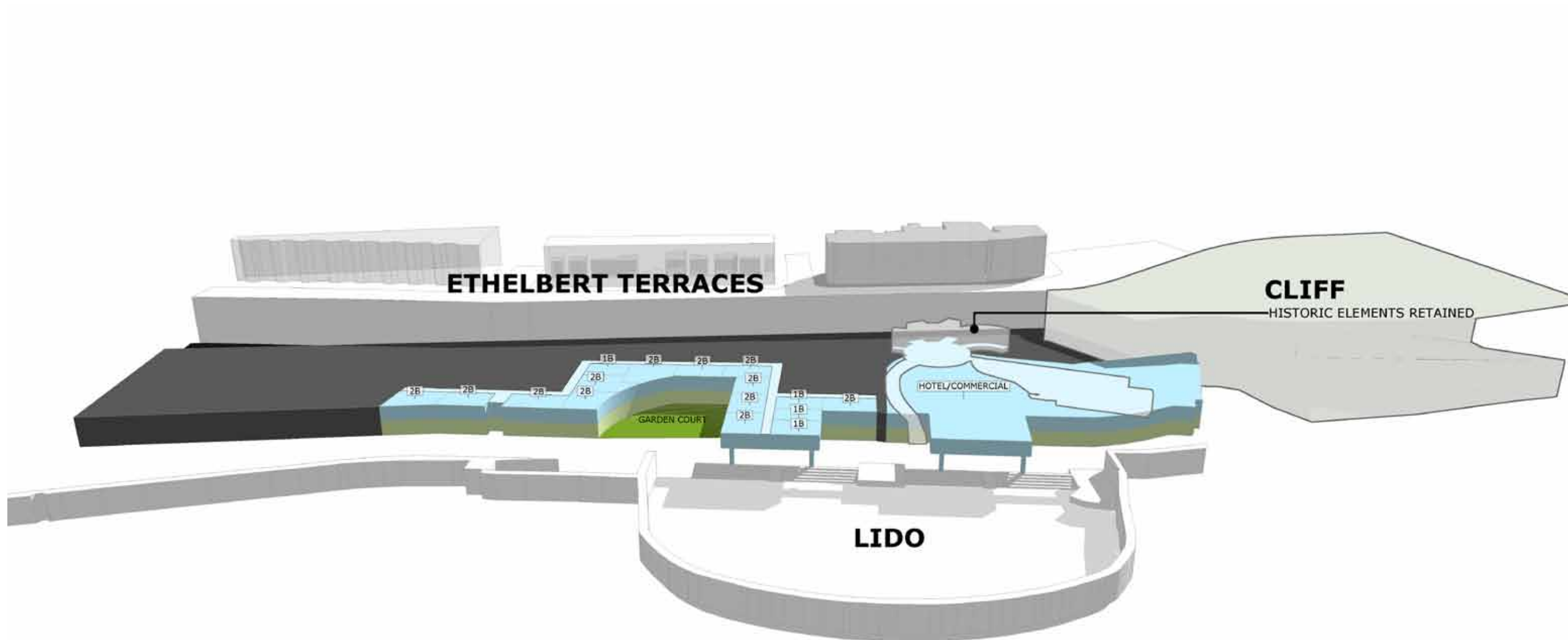
EXISTING SITE - DEMOLISHED AREAS

The Lido - Margate, Kent



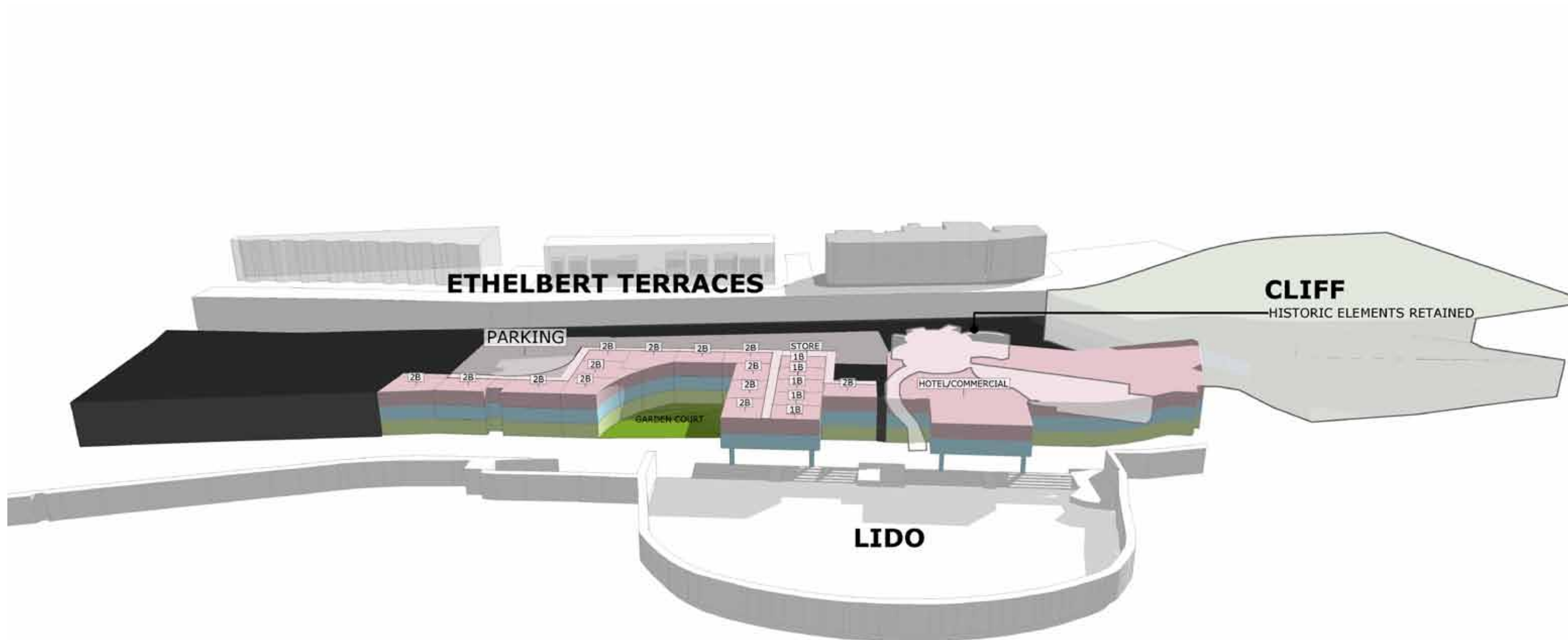
PROPOSED SITE - LEVEL 01

The Lido - Margate, Kent



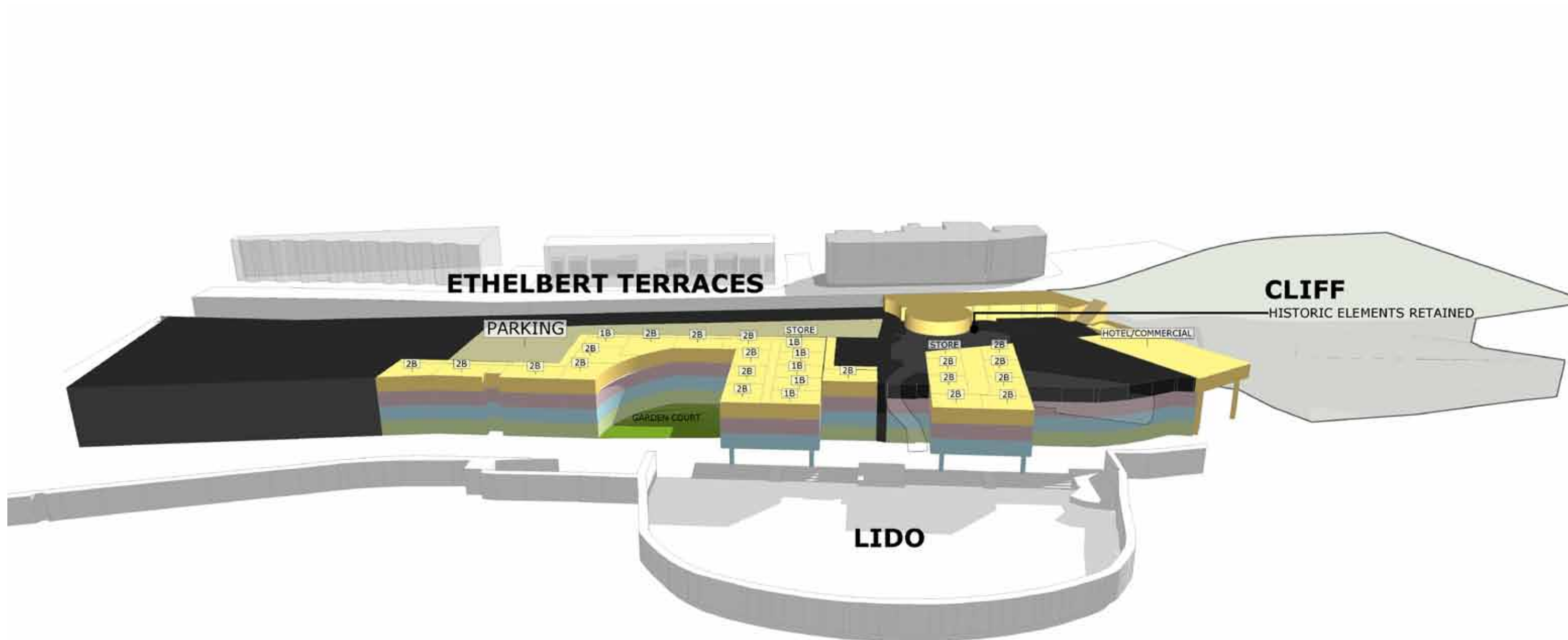
PROPOSED SITE - LEVEL 02

The Lido - Margate, Kent



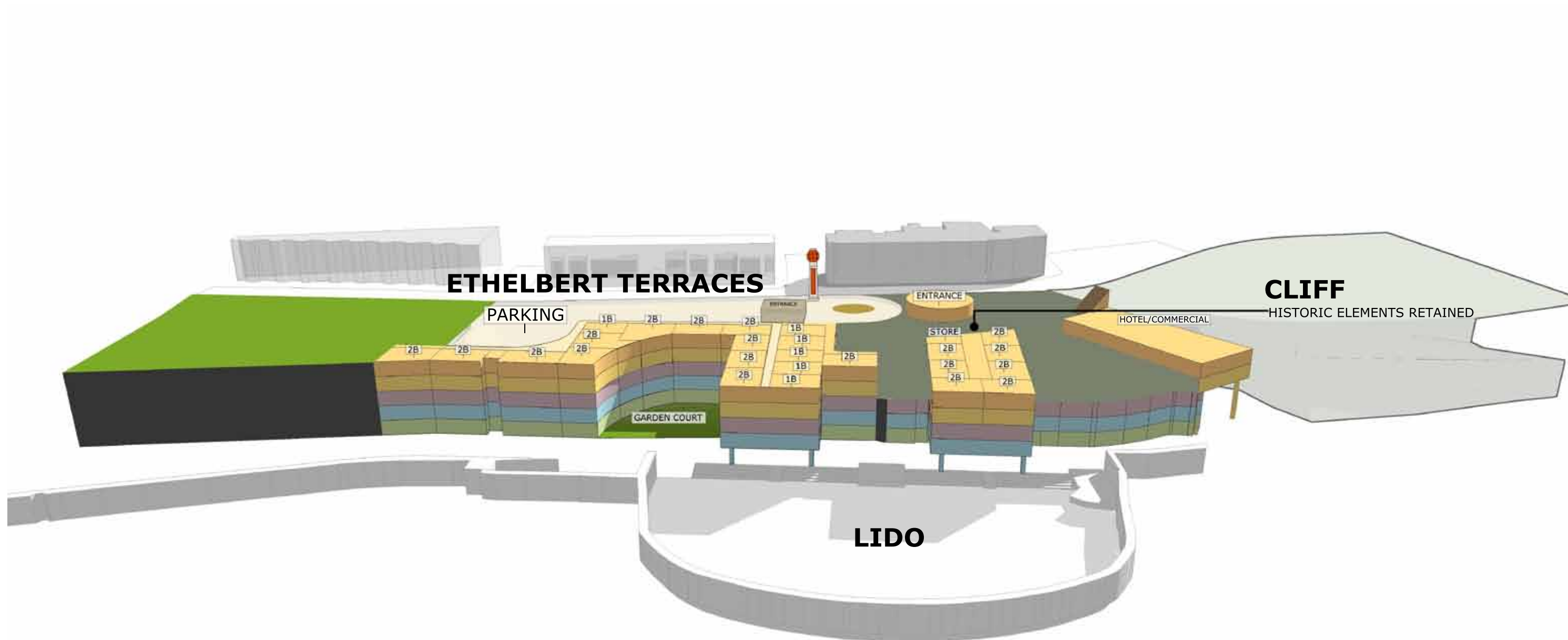
PROPOSED SITE - LEVEL 03

The Lido - Margate, Kent



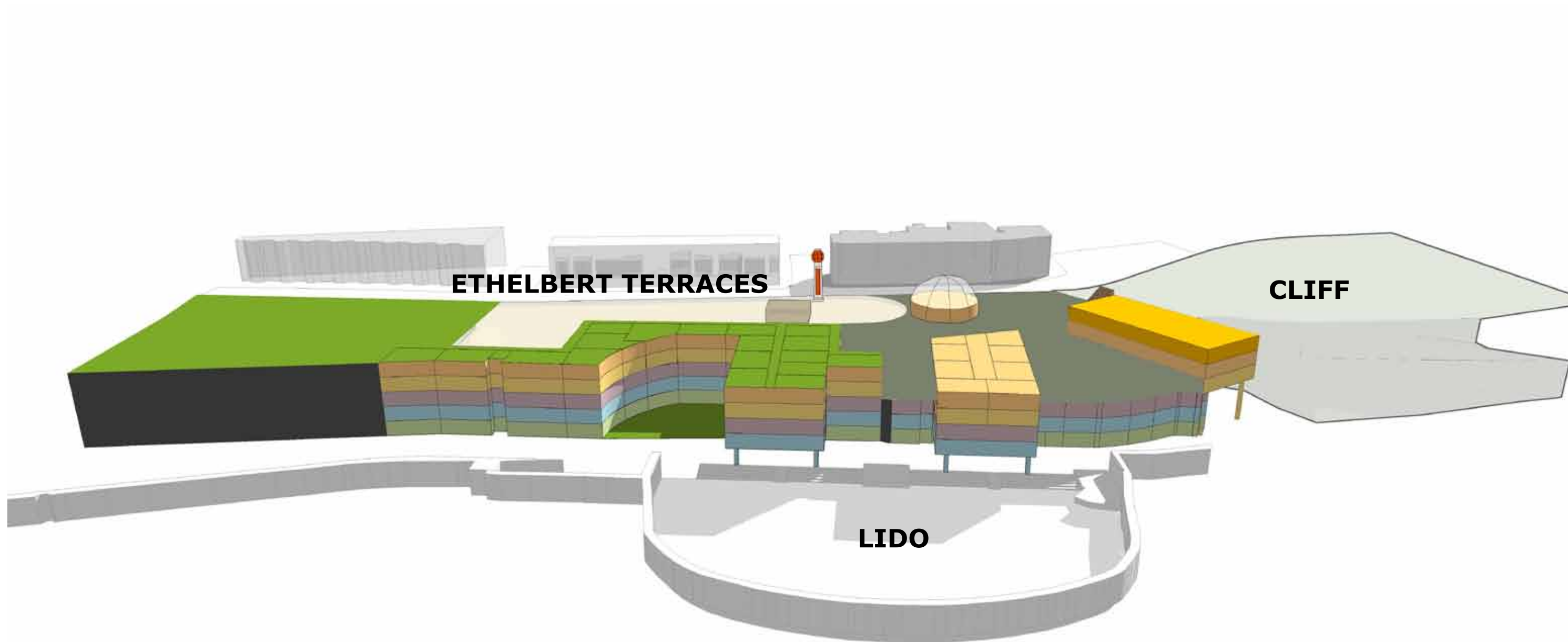
PROPOSED SITE - LEVEL 04

The Lido - Margate, Kent



PROPOSED SITE - LEVEL 05

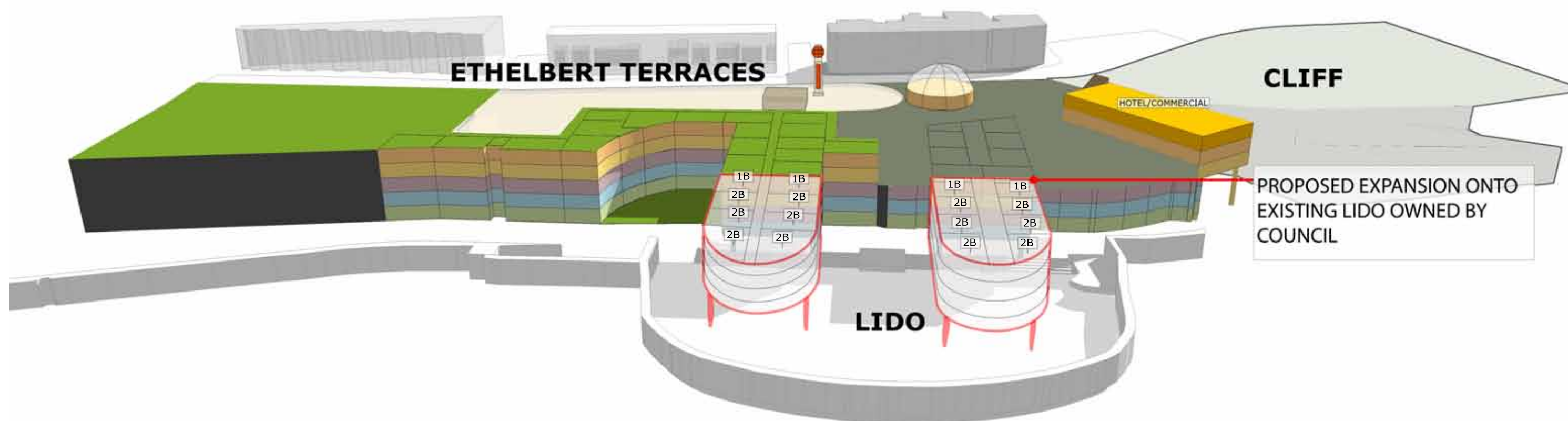
The Lido - Margate, Kent



PROPOSED SITE - LEVEL 06

The Lido - Margate, Kent

The scheme could be extended onto the old Lido site belonging to the Council and this may improve the viability for the Developer and bring revenue to the Council.



LTR/P03741/K/1/NA

06 February 2018

Planning Services
Thanet District Council
PO Box 9
Cecil Street
Margate
Kent
CT9 1XZ

Dear Sir or Madam

RE: PRE-APPLICATION MEETING REQUEST – THE LIDO, MARGATE

This letter accompanies a request for pre-application advice in the form of a meeting and follow up written commentary for proposed conversion and works at The Lido, Margate.

At this stage the detail of the proposed development is open to discussion but the premise is to reinvigorate The Lido and ensure its long term future through renovation and some new development to deliver a mixed use scheme.

The value of The Lido in historic and heritage terms is not underestimated and to that end this submission is accompanied by an extensive Feasibility Study by Lee Evans Architecture. This letter should be read in conjunction with that document.

The applicant does not yet own the site and this is the first step in providing some assurance to investors that the project can be deliverable. It is envisaged that the vision for the site can benefit the applicant as well as the local community and Thanet as a whole, alongside other successful enterprises such as The Turner Contemporary and Dreamland.

Planning Policy

The extant development plan for Thanet is recognised, including the Local Plan and the Cliftonville Development Plan Document.

Reviewing the Proposals Map for the area, it is noted that the site is within the 'Areas in Need of Special Action', which includes consideration of Local Plan Policy H10;

chartered planning and development consultants

Jeanne Taylor Dip TP, MRTPI
Associate Partner: Nathan Anthony BA(Hons), MRTPI
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IN SUPPORT OF THE REGENERATION OF THE FOLLOWING AREAS (AS SHOWN ON THE PROPOSALS MAP), THE COUNCIL WILL PERMIT APPROPRIATE REDEVELOPMENT TO ACCOMMODATE RESIDENTIAL AND OTHER APPROPRIATE USES AND SUPPORT REFURBISHMENT OF PROPERTY TOGETHER WITH ENVIRONMENTAL IMPROVEMENTS.

1. MARGATE OLD TOWN & HARBOUR
2. KING STREET, RAMSGATE
3. HIGH STREET, RAMSGATE
4. CLIFTONVILLE WEST

It is also highlighted on the map as The Lido, covered under Local Plan Policy T5;

THE DEVELOPMENT OF THE LIDO COMPLEX FOR AN APPROPRIATE MIX OF TOURISM, LEISURE AND HOUSING USES, WILL BE PERMITTED SUBJECT TO CONSIDERATION BEING GIVEN TO THE POTENTIAL LOSS OF SEA VIEWS FROM ETHELBERG TERRACE AND BEING SYMPATHETIC TO THE CHARACTER OF THE AREA.

It is considered that Policy CV4 of the CDPD supports the provision of Tourist Accommodation (subject to criteria), which we are hereby proposing.

We acknowledge Policy CV3 and the resistance for new development or redevelopment to incorporate flats but would submit that “there are overriding design or townscape reasons for allowing such development” in this instance. The nature of this site does not lend itself to ‘family homes’ with a front door.

Supplementary Reports

The applicant seeks confirmation of those supplementary reports (beyond the National Requirements), that the Council would seek with the planning application.

Summary

In summary, the following matters are to be considered during the meeting:

- Principle of development;
- Proposed uses and layout and possible design approach;
- Consideration of heritage value; and
- Supplementary reports that would be expected with the planning application package

We understand the fee to be **£1000 (inclusive of VAT)**, plus the potential additional fee of **£150** for presence of a Conservation Officer. Please confirm as such.

Upon confirmation of the pre-app fee, the applicant will forward payment or is happy to accept an invoice following the meeting.

Yours faithfully

Nathan Anthony
For Lee Evans Planning

ENC

Thanet Local Plan

2006



The Lido, Cliftonville.

8.21. The outdated and run down Lido leisure complex lies on the seaward side of Ethelbert terrace, on the cliff face close to the 'Winter Gardens' and proposed Turner Centre. This location provides an ideal opportunity for a mixed-use development with uninterrupted sea views. However, any development must be sympathetic to the character of the area and retain a high proportion of sea views from Ethelbert Terrace. The latter requirement should be reflected in the design of any proposed buildings, which should consider varying heights, above the cliff top, to obtain the most advantageous views from Ethelbert Terrace, Ethelbert Crescent and Cliff Terrace. The following policy will therefore apply.

POLICY T5 THE LIDO SITE

THE DEVELOPMENT OF THE LIDO COMPLEX FOR AN APPROPRIATE MIX OF TOURISM, LEISURE AND HOUSING USES, WILL BE PERMITTED SUBJECT TO CONSIDERATION BEING GIVEN TO THE POTENTIAL LOSS OF SEA VIEWS FROM ETHELBERT TERRACE AND BEING SYMPATHETIC TO THE CHARACTER OF THE AREA.

Language Schools.

8.22 The Thanet towns have a considerable number of language schools. Attendance tends to peak during the Easter period and the summer holiday. A high percentage of students using these services stay with Thanet families or as paying guests. The South East England Tourist Board's document 'The Economic Impact of Tourism - Thanet 1998' estimated that the total visitor expenditure, by such visitors, was £27.15 million in 1998.

8.23 English language schools in Thanet are therefore a major contributor to the local economy, and offer potential for encouraging the next generation of visitors to this part of Kent. The Council wishes to encourage this sector of the local economy to grow.

POLICY T6 LANGUAGE SCHOOLS

LANGUAGE SCHOOLS WILL NORMALLY BE PERMITTED SUBJECT TO:

1) THE NUMBER OF PUPILS TO BE ACCOMMODATED, THE HOURS OF OPERATION, THE RANGE OF FACILITIES PROVIDED AND THE RELATIONSHIP WITH ADJOINING PROPERTIES NOT RESULTING IN AN UNACCEPTABLE IMPACT ON THE AMENITIES OF ADJACENT OCCUPIERS OR ON THE CHARACTER OF AN AREA AS A WHOLE THROUGH NOISE OR GENERAL DISTURBANCE;

2) THE USE OF THE PROPERTY AS A LANGUAGE SCHOOL NOT RESULTING IN AN OVER CONCENTRATION OF SUCH USES IN A PARTICULAR LOCALITY TO A LEVEL WHERE THE CHARACTER OF THAT AREA IS MATERIALLY ALTERED.

PLANNING APPLICATIONS TEAM

Our Ref: PRE/PRE/18/0030
Please Ask For: Lauren Hemsley
Direct Line Number: 01843 577137
Email: lauren.hemsley@thanet.gov.uk
Date: 10 April 2018



C/O Nathan Anthony
Lee Evans Partnership
St Johns Lane
Canterbury
Kent
CT1 2QQ

Dear Nathan

TOWN AND COUNTRY PLANNING ACT 1990 PRE APPLICATION ENQUIRY

PROPOSAL: Mixed use including Hotel, Spa, Residential Apartments, Sculpture Park and associated parking
LOCATION: Lido Pleasure Centre, Cliff Terrace, MARGATE, Kent, CT9 1RU,

Thank you for your pre application enquiry which I received on 9 February 2018 and for meeting at the Council Offices on 12 March 2018 and the extension of time agreement until 10 April 2018.

Site context

The site includes the Lido Pleasure Centre, Grade II Listed remains of the Clifton Baths and associated car parking area. The site is situated within the Clifftop Conservation Area. To the south of the site lies Cliftonville, a predominantly residential area, to the west lies Margate Winter Gardens as well as the Grade II Listed Paragon Court which lie within the Margate Conservation Area and to the east is the vacant putting green and children's playground.

Site history

A number of applications have previously been considered for the redevelopment of the Lido site:

OL/TH/13/0637	Outline application for mixed use development including 2 residential apartment blocks, a hotel block, museum and spa, cliff front apartments, additional residential development within the site curtilage, car parking and amended vehicle access. (<i>withdrawn – 8 May 2014</i>)
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L/TH/13/0518	Underground excavation to reveal full extent of original Clifton Baths Structure and alterations to the structure as a result of subsequent 19 th and 20 th century development, including the construction of the Lido, above and to the north and west of the original baths (<i>Withdrawn – 20 November 2013</i>)
OL/TH/00/0633)	Demolition of existing buildings, erection of new buildings to contain residential, mixed commercial and leisure facilities (<i>Granted 11/04/2001/Not proceeded with 16/11/2005</i>)
OL/TH/90/1215	Erection of two blocks comprising 200 two bedroom flats and 60 one bedroom flats with associated shopping and leisure facilities and provision of 590 car parking spaces (<i>withdrawn 29/02/1996</i>).

Planning Policy

Thanet Local Plan (2006)

Policy T5 relates to the Lido site and states that the development of the site for an appropriate mix of tourism, leisure and housing uses, will be permitted subject to consideration being given to the potential loss of sea views from Ethelbert Terrace and being sympathetic to the character of the area.

Policy T1 relates to tourist facilities in general and states that planning permission will be granted for development which would extend or upgrade the range of tourist facilities, increase the attraction of tourists to the area or extend the season.

Thanet Local Plan Policy D1 states that any new development proposal will only be permitted if it respects or enhances the character or appearance of the surrounding area, provides a high quality and inclusive design, does not lead to an unacceptable impact on living conditions of neighbouring occupiers, and retains open spaces and gaps in development that contribute to the quality of the local environment. In addition, Thanet Local Plan Policy D2 relates to landscaping.

Thanet Local Plan Policy TR3 relates to the provision of adequate transport infrastructure to serve a development and Policy TR15 states that development proposals which are likely to generate a significant travel demand or traffic movement would be required to demonstrate, through the use of green travel plans, that alternative methods of transport to private car travel would be encouraged.

Thanet Local Plan Policy TR16 outlines that proposals for development will be required to make satisfactory provision for the parking of vehicles and Thanet Local Plan Policy TR12 relates to cycle parking.

Thanet Local Plan Policy SR10 relates to Public Open Space which part of the proposal falls within and it states that development will only be permitted on public open space in very exceptional circumstances and further details these exceptional circumstances.

Thanet Local Plan Policy CF2 states that where a proposed development would directly result in the need to provide new or upgraded community facilities (including transport infrastructure,

educational or recreational facilities or affordable housing), the local planning authority will negotiate with the applicant for a contribution towards the cost of such provision, which is fairly and reasonably related in scale and in kind to the proposed development. The Council's Planning Obligations and Developer Contributions Supplementary Planning Document also details this.

Thanet Local Plan Policy H1 relates to the principle of residential development, Policy H8 stresses that on sites where 10 or more residential units are proposed, a mix of dwelling sizes and types is expected, with 15% of units being expected to be designed as lifetime homes, and Policy H10 relates to Areas in need of Special Action, of which Cliftonville West is included.

Thanet Local Plan Policy H14 states that where development is proposed which, in its completed form, would amount to fifteen or more residential units, the District Council will negotiate with the developer for the inclusion of an element of affordable housing, and the provision of affordable housing will be a material consideration within the planning process. The Council's Planning Obligations and Developer Contributions Supplementary Planning Document also details this.

Thanet Local Plan Policy SR5 outlines the requirement for doorstep play space for units of accommodation that could be used by a family, and that the District Council will expect a commuted payment to be made for the provision, maintenance and upgrade of play facilities.

Emerging Local Plan to 2031

The new Local Plan upon adoption will replace the saved policies of the 2006 Local Plan. Policy SP08 specifically relates to the Lido site and states that proposals for leisure and tourism related uses will be supported at the Lido. Any development must respect and restore the site's status as a significant heritage asset.

National Planning Policy Framework (NPPF)

The NPPF will be relevant to any planning application at the Lido site. Paragraph 132 in particular details that when considering the impact of a proposed development on a significant heritage asset, great weight should be given to the asset's conservation.

Cliftonville Development Plan Document (2010)

The site is located within Cliftonville West, and falls within the area to which the Cliftonville Development Plan Document (DPD) applies. Policy CV1 of the DPD states that "proposals to provide single bedroom flatted accommodation, bed sits and non self-contained accommodation will not be permitted. This includes provision by way of conversion of existing buildings and by way of new build."

Furthermore Policy CV3 states that "flats of any size will not be permitted unless it can be clearly demonstrated that there are overriding design or townscape reasons for allowing such development and that no acceptable design solution can be found to accommodate individual family dwellings."

Policy CV4 of the DPD relates to the provision of tourist accommodation and amongst other requirements sets an expectation for such accommodation to be well designed and compatibility with neighbouring property uses and Policy CV5 sets out specific requirements for cycle parking.

Proposal

The proposal put forward for pre-application advice is for a mixed use development at the Lido site, including the restoration of the Clifton Baths and their incorporation to a spa hotel with 100 bedrooms and 90 residential apartments, associated parking, together with a sculpture park. The site is detailed to comprise of 6 levels and proposes to strip back the later developments on the site which overlay the historic baths. The new residential development is proposed to follow the cliff line starting at the promenade level with projections over the promenade fronting the lido pool. It is indicated that the entrances to the car park serving the apartments and hotel as well as some hotel rooms would rise above the sculpture garden and the glass dome is proposed to be restored.

Analysis

The site presents significant opportunities but considerable challenges. The subterranean listed structures are of great historic interest, particularly in relation to Margate's development as a seaside resort. The 1920s Lido structures are of considerable interest in terms of popular culture. It is clearly a unique site, given the challenging inter-relationship between the different layers of development. In establishing which parts of the site should be protected, restored or potentially lost, it is necessary to assess what is significant about the site, both nationally and locally. An initial desktop assessment is provided with the submission indicating the history of the site and a broad heritage context. At this stage, intrusive work and studies have not been provided to accompany the pre-application submission. The response is therefore based on the principle of the development and broad layout, character and appearance impacts. Further studies to assess the significance of the listed Clifton baths, the impact on the Clifftop Conservation Area and adjacent Listed Paragon Court are required in the form of a detailed Heritage Statement. Further structural surveys are required to inform a more detailed design discussion prior to the submission of a formal application.

Principle

The site specific policy within the Thanet Local Plan, Policy T5, stresses that the site should be redeveloped by an appropriate mix of tourism, leisure and housing uses. The proposal put forward for pre-application advice for a mixed use development at the site, including the restoration of the Clifton Baths and their incorporation to a spa hotel, new apartment hotel and residential apartments together with a sculpture park generally accord with the policy in terms of principle and the uses proposed.

There is policy support in principle for the restoration of the Lido and the complimentary tourism/leisure uses. The Grade II listed Clifton Baths are of great significance and I would strongly advise that the Conservation Officer, Heritage Officer and Historic England are regularly consulted

in the preparation of a planning application and listed building consent submission and further pre-application discussion is advisable.

Character and Appearance and impact upon designated heritage assets

The plans illustrate scale and massing but not design, so comments are given based on the general parameters of the proposals, design will be an important consideration in the assessment of any formal submission with any rationale informed by the Heritage Statement and supporting studies required.

Hotel

The hotel/commercial projection is orientated to the north west of the site and angled away from Ethelbert Terrace. Sections of the site have not been provided at this stage, but the hotel looks to project two storeys above the street level, at levels 5 and 6. The hotel use is linked with the listed Clifton Baths and the location of this use looks to be appropriate. There have historically been buildings on this edge of the site and a Heritage Statement would need to inform the design rationale. Concern would be raised with any projections above the street level. The Lido and similarly the Margate Winter gardens site along the seafront, are at lower levels to the street and this forms an important part of the character and appearance of the seafront and the historic pattern of development. Further detailed drawings would be required to make an assessment of the level of harm which would be caused in this position from any projections above street level in the context of the loss of sea views from Ethelbert Terrace and in addition to the impact on the Clifftop Conservation Area and Margate Conservation Area and the Grade II listed Paragon Court, in conjunction with Policy T5 of the Thanet Local Plan.

Residential

The apartments are shown to be built into the cliff line towards the east of the site and do not look to raise above the existing adjacent street level, although sections would be required in order to fully assess the relationship with Ethelbert Terrace in order to maintain the currently uninterrupted sea views. The units look to be single aspect fronting the sea and promenade with a garden court area. A significant level of excavation would be required in order for the residential units to be situated in the position detailed on the plans. This would be a substantial change from the existing character and appearance of the cliff line, seafront, and the designated heritage asset so careful consideration of design rationale in the context of the site is required following the detailed assessment of the significance of the existing assets

In terms of the residential units proposed, 90 apartments are indicated on the plans with a mixture of 1 bedroom and 2 bedroom apartments. Policy CV1 of the DPD states that “proposals to provide single bedroom flatted accommodation, bedsits and non self-contained accommodation will not be permitted.” This was discussed at the pre-application meeting and it was advised that 1 bedroom units are not supported in the Cliftonville area.

In terms of the plan indicating expansion of the development onto land owned by Thanet District Council, it was advised in the meeting that land ownership discussions would be a separate matter from the planning process. The Interim Head of Asset Management Edwina.Crowley@thanet.gov.uk would be the main points of contact for further discussions. The projection of units over the promenade level as detailed in the plan, would create a substantial change to the character and appearance of the area, an assessment would need to be considered in conjunction with Paragraphs 132 and 133 of the National Planning Policy Framework as from the available information this would appear to harm the significance of the listed structures. In terms of any justification for the level of residential units, which may fall outside of the main footprint of the site, or be considered to form part of an enabling development argument, this would need to be clearly demonstrated in terms of a viability assessment and following the steps below.

Enabling Development

Enabling development is defined by Historic England as 'development that would be unacceptable in planning terms but for the fact that it would bring public benefits sufficient to justify it being carried out. The key benefit to significant places is usually securing their long term future.' This approach requires significant understanding of the listed structures, together with a detailed and costed schedule of repair and restoration work, including a comprehensive economic viability assessment for the whole site.

The cost of work to the listed structure, to secure its long-term future, should then form the basis of your development proposal for the remainder of the site. Historic England define this form of enabling development as 'the minimum necessary to secure the future of the place' - therefore the long-term plan for the future of the listed structure should involve some level of income-generation.

For an enabling development argument to be accepted by Historic England, there will need to be a public benefit involved i.e. public access to the site. They advise that 'the public benefit of securing the future of the significant place through such enabling development decisively outweighs the disbenefits of breaching other public policies'.

The impact of the development for the whole site therefore needs to be precisely defined at the outset, which Historic England advise should be through the granting of full, rather than outline planning permission. Full information is necessary not just to demonstrate the physical impact but also to establish and quantify need, since the financial considerations involved are fundamental to the decision.

The site, therefore, must have a positive market value on completion of repair and must return to beneficial use, or there must be clarity about who will take responsibility for the site in the long term. A solution that does not provide the means of meeting recurrent costs that cannot be generated by the place itself will not be acceptable.

There is extensive guidance on the preparation of an enabling development case in Historic England's 'Enabling Development and the Conservation of Significant Places', which should form the basis of your planning application.

Sculpture Park

The sculpture park could provide a significant addition to the tourism offer for Thanet and would compliment the Turner Gallery and other artistic attractions in Margate and Cliftonville. It is considered this could be an enhancement to the character and appearance of the area, providing the policy considerations are adhered to in terms of the uninterrupted views from Ethelbert Terrace in particular.

Impact upon designated heritage assets

The extent of the Listed Structure is significant and the extent of demolition and excavation of the surrounding site will need to be subject to more detailed analysis which confirms that any features to be removed are not important to the historic integrity of the building and/or capable of being salvaged or repaired. The Cliff Bar could possibly be a Georgian structure, for example. It is not clear from the information submitted at this pre-application stage what the detailed proposals are for the listed structure, or what will be protected, repaired or restored and how this will be incorporated into the new development proposal. It will be important to conserve and retain the heritage asset and a significant level of detail and investigative evidence will be required, in order to understand your proposals, with detailed advice and input required from Historic England.

Once detailed proposals have been drawn up you will need to establish a hierarchy of works, prioritising the areas most at risk, and of greatest significance. This schedule of works will need to be fully costed. I appreciate that full cost details may need to include a significant degree of flexibility at this stage.

In addition to the listed structure itself, there is also the consideration of the impact of the proposal on the Clifftop Conservation Area and the adjacent Margate Conservation Area and listed Paragon Court. The Conservation Area Appraisal documents for these Conservation Areas will be a useful resource to inform the Heritage Statement.

Living Conditions

Future occupiers of the site

Specific details relating to the residential accommodation have not been submitted, so it is difficult to comment as to whether the units proposed provide a reasonable standard of accommodation in terms of room sizes, or the provision of reasonable outlook, and whether there is the potential for areas for safe doorstep play space to be created and other necessary facilities to be provided. The current Local Plan does not include specific space standards, but the emerging Local Plan will incorporate the national space standards. Details of clothes drying facilities and refuse collection in accordance with Policy D1 of the Local Plan would need to be submitted for a formal planning application and Policy SR5 also requires doorstep play space to be provided for units of 2 bedrooms or more.

Neighbouring property occupiers

In terms of the living conditions of neighbouring occupiers as a result of the proposals, we would need more detailed plans in order to establish whether the proposals are acceptable. Policy D1 of the Local Plan outlines the considerations in more detail.

Highways and Parking

The development would require a Transport Assessment and Travel Plan because of the uses and number of units proposed. Parking is shown on the plans but it is not clear where the access points would be within the site and parking numbers proposed at this stage. Cycle parking should be provided within the site. Visitor numbers to the hotel and sculpture park would need to be projected and the application will need further work and discussion with highways in particular in conjunction with Thanet District Council as the Local Planning Authority and this is advisable prior to a formal application.

Kent County Council Highways and Transportation provide their own pre-application advice. Therefore if you wish to gain the formal view of the highways authority, please refer to the following link:

<http://www.kent.gov.uk/waste-planning-and-land/planning-applications/planning-advice/highway-pre-application-advice>

Developer Contributions and Affordable Housing Provision

In relation to any residential development at the site, we would look to negotiate provision of affordable housing on site if a registered provider could be found, or for an off-site contribution (if it is demonstrated that there is no interest from a Registered Provider) in accordance with Policy H14 due to the number of units proposed. It would also be necessary to enter into negotiations for development contributions towards community facilities in consultation with Kent County Council in accordance with Thanet Local Plan Policy CF2. It would be important to have further discussions about these issues prior to a planning application submission.

I would also recommend viewing the council 'Planning Obligations and Developer Contributions' supplementary planning document on the Thanet District Council website, which was adopted in April 2010.

Environmental Impact, flooding and land stability

Parts of the site are within Flood Risk Zone 3 and a flood risk assessment is therefore required. There has been water egress over a number of years into the site. We would expect to see further survey work undertaken to provide more information about the impact this has had on the building and listed structures. It would be necessary to employ relevant consultants for this work. It would also inform the suitability of the proposed uses and their location within the site. The Turner Contemporary and Rendezvous applications would provide useful comparative information.

Ecology

As advised at the pre-application meeting, for all residential schemes proposing ten or more dwellings a tariff is due per dwelling to mitigate the potential in-combination impacts of new housing development in the vicinity of the Thanet Coast and Sandwich Bay Special Protection Area (SPA) under the requirements of that Habitats Regulations 2010. This can be secured through a Unilateral Undertaking or form part of a S106 agreement, for which the council has a template, which can be adapted to meet the requirements of this site. We would expect a document to be either submitted with the application, or during the application process, this cannot be dealt with through a condition. More information is available on our web pages in relation to the Strategic Access Management Monitoring Plan contributions and the different levels of contribution required depending on the number of bedrooms provided, which is found here:

<https://www.thanet.gov.uk/your-services/planning-policy/evidence-base/environment-and-quality-of-life/>

The excavation works do not currently look to interfere with the chalk cliffline, but it may be prudent to seek advice from Natural England prior to the submission of a formal application because of the location of the site adjacent to an SPA, SAC and SSSI.

Impact of Proposed Development

Given the sensitivities of this site, it is unlikely that an outline application would be acceptable. A high level of detail is required for the different elements from the outset, due to the listed structures and adjacent conservation areas and heritage assets.

Consultee views on proposals for this site will be key to a deliverable development. The input from Historic England, Highways and the Environment Agency and Natural England will be particularly important. A design review would be appropriate for this site and effective local community engagement as part of the design process. A statement of community engagement would be appropriate to evidence the issues raised by the community and how these had been addressed.

Planning Performance Agreement

It is advised that you may wish to benefit from entering into a Planning Performance Agreement with the planning department before proceeding with further pre-application advice. This process is used to set out a transparent process for determining large or complex planning applications, encouraging joint working with the local planning authority and statutory consultees. The agreement would be built around an agreed timetable, development objectives and responsibility for tasks, and would set a timescale for determination of the planning application upon submission. This would include a contribution to assist with abnormal costs of pre-application and processing the application, to provide for the extra capacity that is required to ensure a timely and effective service. We are in the process of formulating a template agreement and charging schedule, and would welcome the opportunity to discuss this in greater detail with you prior to any future submission.

For further information about planning performance agreements is available via the following link: <http://planningguidance.communities.gov.uk/blog/guidance/before-submitting-an-application/planning-performance-agreements/>

Conclusion

There is policy support in principle for the restoration of the Lido and complimentary tourism and leisure uses, which will have a positive impact on Margate and Cliftonville and the overall tourist offer for Thanet. The different facets of the submitted proposals for pre-application advice to consist of the hotel, residential development and sculpture park all have different policy considerations and impacts on the neighbouring properties. Whilst the principle of development is acceptable, a detailed assessment of the significance of the designated heritage asset (with structural and internal surveys) and an analysis of how the proposed works would affect that significance must be carried out at this stage to inform any proposals going forward. There are also significant issues to be addressed with the hotel and residential buildings proposed, in particular Policy D1 and T5 in terms of the impact on the character of the area, and the interruption of views from the historic terraces situated adjacent to the site from any projections above street level. The listed baths will need to be sensitively considered with any development of the site.

Viability and deliverability of the restoration proposals would need to be fully evidenced and secured through legal agreements. Thanet District Council Planning Team would wish to be involved in future proposals for the site including attending further meetings (including being invited to those with other technical consultees such as Historic England and KCC Highways) and consultation events as they come forward. We would anticipate a further pre-application submission, following the completion of initial surveys, prior to a full application submission.

The advice contained in this letter is given without prejudice to the Council's normal decision making process.

Yours sincerely

A large black rectangular box redacting the signature of the Planning Officer.

Lauren Hemsley
Planning Officer