

## **Matter 12 – Town and District Centres (Policies SP06-SP10 and E04-E06)**

### *Issue 1 – Thanet's Town Centres – Policy SP06*

Q1. What criteria have been used to determine the hierarchy of centres? Does this relate to the size and existing provision within settlements?

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Core document CD3.4 (Thanet Retail and Leisure Assessment 2018 update) has been used to provide precise gross capacity figures for convenience and comparison floorspace (table 2.1/page 4 and table 2.2/page 5) at Westwood, Margate, Broadstairs and Ramsgate which have been incorporated unchanged into table 1 of the Local Plan town centre strategy. No other data from the assessment has been used.

Policies SP13 (Manston Green), SP14 (Birchington), and SP16 (Westwood) require the provision of “small scale convenience retail provision to accessibly serve the day to day needs of the development” and in SP15 (Westgate-on-Sea) the “provision of a District Centre to meet the retail need of the development ...”

These policies give no indication of the amount of convenience or comparison floorspace that would be required to serve these developments.

For the Birchwood/Westgate area the Thanet Retail and Leisure Assessment 2018 update identifies gross convenience capacity of -345sqm (table 2.1/page 4) and gross comparison capacity of +889sqm (table 2.2/page 5).

As such, there is the risk that without any guidance on the scale of retail provision sufficient floorspace may not be provided resulting in residents having to drive to surrounding retail centres.

The local centres and district centre provided for at the strategic allocations have not been included in the hierarchy set out in paragraphs 2.7 and 2.8 of the Local Plan. If the allocations are incorporated in the plan it would be helpful for them to be included in the list of local and district centres.

## Matter 12 – Town and District Centres (Policies SP06-SP10 and E04-E06)

### Issue 1 – Thanet's Town Centres – Policy SP06

Q6. What are the figures in Table 1 based on? Are the figures for convenience and comparison goods accurate and robust? Are the figures net or gross?

The Appendix 2 and 3 table 11 estimates in core document CD3.4 (Thanet Retail and Leisure Assessment Update 2018) have been used to draw up Local Plan table 1.

Whilst Policy SP11 phases housing development in 5-year periods this approach is not used for retail provision. The table 11 estimates for convenience and comparison floorspace (see below) indicates that additional retail floorspace is required later in the plan period. It would be helpful for the plan to provide greater guidance on when additional floorspace should be provided.

#### Convenience retail floorspace requirements (sqm gross)

Centre	2016	2021	2026	2031	Change 2016-2021	Change 2021-2026	Change 2026-2031
Margate/Cliftonville	-108	93	396	700	201	303	304
Westwood Cross	-3148	-2727	-2096	-1461	*	*	*
Broadstairs/St Peters	629	884	1266	1650	255	382	384
Ramsgate	-478	-163	309	783	*	472	474

Source: Lichfields Thanet Retail and Leisure Assessment 2018 Update Appendix 2 Table 11

Note: \* The figures remain in the negative and indicate there is no need for additional floorspace during the period.

#### Comparison retail floorspace requirements (sqm gross)

Centre	2016	2021	2026	2031	Change 2016-2021	Change 2021-2026	Change 2026-2031
Margate/Cliftonville	0	181	977	1853	181	796	876
Westwood Cross	0	1643	8851	16787	1643	7208	7936
Broadstairs/St Peters	0	210	1130	2143	210	920	1013
Ramsgate	0	276	1488	2822	276	1212	1334

Source: Lichfields Thanet Retail and Leisure Assessment 2018 Update Appendix 3 Table 11

These figures demonstrate overprovision of 1,461 sqm gross convenience retail floorspace at Westwood Cross.

CPRE Kent is concerned that the potential to use overprovision of convenience floorspace for future comparison use does not appear to have been considered.

## **Matter 12 – Town and District Centres (Policies SP06-SP10 and E04-E06)**

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Q8. Does the Plan identify the need for other uses such as leisure, commercial, office, tourism, cultural, community and residential development needed in town centres? How will the need for such uses be met over the plan period, having regard to paragraph 23 of the Framework?

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Core document CD7.12 (2018 Annual Monitoring Report) states at page 20 that in 2017/18 24% of shops were vacant in Margate town centre and 12% were vacant in Ramsgate town centre. The table at figure 9 demonstrates that since 2006/07 Margate town centre has had 12%, and more, vacant shops. The Council's target set out in the AMR is 5%.

It is not clear if the scale of vacancies is due to the size of units or other factors.

In terms of ensuring the vitality of town centres paragraph 23 of the NPPF recognises that residential development has a role to play in placing town centres at the heart of communities and the importance that a mixed range of uses has in supporting their viability and vitality.

Policy SP08 (Margate) provides for residential development above ground floor only in the Old Town and Seafront and Harbour Arm areas.

NLP Town Centre Retail, Leisure, Tourism and Culture Assessment December 2012 Appendix 3 Audit of Centres (CD3.3) indicates there were some 16 vacant units in the Seafront and Harbour area and 18 in the Old Town area that lie outside the proposed Primary and Secondary shopping frontages.

As written Policy SP08 would unnecessarily resit their change of use to residential – contrary to the NPPF.

In respect of Ramsgate, paragraph 2.34 Local Plan states *"The former surplus of small shops beyond the town's commercial core has been refurbished to provide quality residential accommodation and there is a viable mix of residential and commercial use including specialist shopping."*

This approach should be promoted in Margate.