

**Craig Solly**

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

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### ***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?*

#### **Response:**

Cliftonville is most certainly able to provide parking and the space in comparison to the town centres and did house traditional shops such as woolworths, boots and other similar sized shops.

You can argue that there is over provision of convenience stores in these areas as many town centers have been overshadowed by Westwood.

I am not entirely sure that the policy is positively planned for the town centres under NPPF 23. It is clear that Ramsgate, Margate, Broadstairs and Cliftonville have declined over the years due to Westwood, but the policy appears to me to safeguard the sustainability of Westwood. Considering that the coastal towns have catchment of tourism, it is rather odd that they have declined. There shouldn't be a issue of a large retailer going to a town centre than Westwood Cross.

Some District and Local Centres seem to be successful in Thanet (Birchington, Westgate, Westbrook, St Peters Minster), and they do have a large role for the areas they serve and policies should safeguard this. Im not sure that local centers are harmful to the town centres, each does there own roles to play on the areas that they serve. The question arises of what about Cliftonville what role should this serve given the size and the ability to walk across the area sustainably.

*Q2. Is the hierarchy of centres justified and clear to decision-makers, developers and local communities? Are the town centre boundaries illustrated on the policies maps for Westwood, Margate, Ramsgate and Broadstairs?*

#### **Response:**

I am not too sure on how this was assessed, and some areas may not be categorized appropriately.

Q3. Is the Plan consistent with paragraph 23 of the Framework which, amongst other things, states that Local Plans should define the extent of town centres and primary shopping areas?

**Response:**

It is not clear on what classes of commercial development are accepted in the different areas. There is a concern of a large retailer setting a site near Birchington and Westgate due to the increase of housing in these areas. This can undermine the independent shops which are successful at the moment.

*Q4. Is Westwood identified as a centre at the top of the retail hierarchy? If so, what is the justification for this?*

**Response:**

It is concerning that the current retail climate is changing, the online markets are having a effect. A anchor business (Debenhams) is currently in administration, and the other anchor (Marks and Spencer) is scaling down its stores and focusing on the food markets and this puts questions on the Westwood site for the long term. Westwoods role is maybe is too aspirational for the retail climate we are in at the moment and uncertain.

*Q5. Is the retail strategy (set out in paragraph 2.10 of the Plan) to retain Thanet's market share of retail expenditure in the sub region, and not increase it, the most appropriate strategy for the area? Is it justified by appropriate available evidence?*

**Response:**

Many retailers have moved to Canterbury as stated in my representation in SP07 for Westwood, I presume to scale down their businesses. Saying this Canterbury does have its issues in much the same way (debenhams and nasons closing). There is a problem in the retail markets at the moment and online shopping is causing part of this disturbance.

*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?*

**Response:**

Flexibility should be considered.

## **Issue 2 – Westwood - Policy SP07**

*Q4. Is it clear to decision-makers, developers and local communities what uses will be permitted at Eurokent? Is the policy effective?*

### **Response:**

It is not clear if this will be deliverable the site was granted under appeal in 2014 Ref: APP/Z2260/A/14/2213265. There has been correspondence and approval on 18th September Planning Ref OL/TH/11/0910. I have concerns on this site as the original planning application was made originally in 2011.

*Q5. What is the justification for allocating the site for up to 550 dwellings and 5.45 hectares of land for business uses? What is this based on and is it achievable?*

### **Response:**

See Q4

*Q8. How has the effect of the proposed development on the local road network been taken into account? How will the site be accessed, and is it clear to decision-makers, developers and local communities what the necessary highway improvements consist of?*

### **Response:**

It appears that previous transport strategy has not been effective and the transport network has had funding under “Growth Without Gridlock”. This has resulted in the Haine Corridor to be at capacity. It appears the Inner Road Circuit has been designed to address this and further representation is made under SP47. The concern is the effect to Broadstairs which appears not to have been considered in this Local Plan. With the amount of development at Westwood generally I am concerned that the transport issues will continue.

*Q10. What is the justification for allocating land at Thanet Reach as part of a mixed-use development? Is the site deliverable?*

### **Response:**

As stated in my representation on comments on paragraph 11.30 11.35 (page 142) Canterbury Christchurch has vacated the buildings and the campus is no longer.

Also planning application OL/TH/07/0650 was granted in 2009, no work has been done on this application and has probably expired, and it appears this site is not deliverable, this was a application by East Kent College.

The question posed under Matter 12 Issue 1 Q8 asked if Town Centres should offer more flexible use.

Does the council have a plan for this site? does mixed use provide the best option? Is it Justified?

***Issue 4 – Ramsgate - Policy SP09***

Q1. What is the justification for requiring development proposals to have regard to the emerging *Ramsgate Maritime Plan*? What is the current status of the Maritime Plan and is it clear to decision-makers, developers and local communities what is required of proposals for new development? Is the policy effective?

**Response:**

As stated in my representation Ramsgate port is unclear on what its role in in the plan period. This is a current issue in the council and decisions are to be made on budgets and the long strategy of the port. As stated the port has lost money over several years. There is a local election on 2nd May 2019, and it will be hard to judge what the future of the port is at this moment in time.

The council needs to clarify the position.

***Issue 6- Primary and Secondary Frontages - Policy E04***

Q1. What criteria have been used to determine the primary and secondary frontages? Are they justified and clear to decision-makers, developers and local communities?

**Response:**

I maintain the view on what is Cliftonvilles role as it is a subtaintal area and could potentially deliver a mix of retail, food and entertainment uses.