

Thanet District Local Plan Examination Matter Statement

Matter 12 – Town and District Centres

on behalf of Margate Estates Limited

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1.0 Introduction

Matter Statement

- 1.1 This Matter Statement has been prepared on behalf of Margate Estates Limited in relation to Matter 12 – Town and District Centres of the Inspectors’ Matters, Issues and Questions for Examination document, updated 4 March 2019.
- 1.2 This Statement specifically relates to Issue 1 – Town Centres (Policy SP06) and Issue 3 – Margate (Policy SP08).

Margate Estates Limited

- 1.3 Since acquiring Dreamland in November 2017, Margate Estates have invested more than £50 million in Dreamland and more widely, Margate. Margate Estates have been working tirelessly to put Dreamland on the map as an entertainment, corporate and wedding destination and brought the event spaces back to life, and through investing in other improvements in the surrounding area. By association, their works to Dreamland are making an important contribution to the viability and vitality of Margate and its continued regeneration.
- 1.4 Margate Estates is dedicated to ensuring that Margate’s unique appeal is utilised to its utmost potential and that the town becomes a ‘year-round’ destination. Margate Estates is committed to this resurgence, and aims to build Dreamland into a world-class entertainment venue and provide workspace and facilities for creative industries to thrive.
- 1.5 The submission of this written matter statement is on behalf of Margate Estates, and forms part of the longer term management and development aspirations for Dreamland, and for Margate more widely.

2.0 Response to Matter 12 – Town and District Centres

Issue 1 – Thanet’s Town Centres (SP06)

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?

- 2.1 In regards to the retail hierarchy, the Local Plan does not clearly set out which town centres have been assigned to which tier in the hierarchy, nor does it provide guidance about the acceptable level of retail development in those tiers. Paragraph 2.5 of the Local Plan identifies that Westwood sits at the top of the retail hierarchy, however does not present an official title (we have assumed that it would be referred to as Westwood Town Centre). Similarly we have assumed that the next tier down is Coastal Town Centres, consisting of Margate, Broadstairs and Ramsgate. This results in some confusion, as the ‘town centre’ title indicates Westwood would be considered the same tier as Margate, Broadstairs and Ramsgate. All four of these locations are referenced in policy SP06. We would expect that the hierarchy of centres is more clearly set out as required by Paragraph 23 of the NPPF.
- 2.2 Town centre boundaries for Westwood, Margate, Ramsgate and Broadstairs are not currently included on the policies map, and as such, the town centres and their boundaries are not clearly defined. We would suggest that town centre boundaries should be included within the policies map to ensure clarity around the application of town centre policies.

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?

- 2.3 Paragraph 23 of the NPPF (2012) provides guidance around the promotion of competitive and viable town centres. Specifically, paragraph 23 suggests that the local planning authority should define the extent of town centres, primary shopping areas and primary and secondary frontages. At present, the policies mapping presents only primary and secondary shopping frontages with no mention of primary shopping areas or town centre boundaries.

2.4 Using Margate as a specific example, at present, primary and secondary shopping frontages are illustrated and we assume therefore that these are the frontages and streets that would be included in either the primary shopping area or the town centre boundary were that boundary to be illustrated, however this is not clear at present.

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?

2.5 Paragraph 2.10 of the Local Plan states

"Thanet currently retains 85% of retail expenditure within the district and given this healthy retention rate there is no need to increase Thanet's market share within the sub region. However in order to maintain the current market share the following growth will be required over the plan period:

- *24,567 square metres of floorspace selling comparison (high street style) goods. The majority of this is needed at Westwood which requires 16,787 square metres.*
- *1,255 square metres of floorspace selling convenience goods and*
- *4,338 square metres of A2-A5 floorspace is needed across Thanet.*

2.6 Paragraph 2.10 has identified a need to retain Thanet's existing market share within the sub-region which we agree is important for the future economic vitality of the District as a whole. The paragraph goes on to specifically allocate 16,787 square metres of comparison goods floorspace to Westwood. While Westwood may be the premier comparison goods retailing location in the district at present, we would suggest that in order to retain Thanet's market share in the wider region, additional comparison goods floorspace would be more usefully directed towards other towns within the hierarchy of centres, and particularly those that may be in decline. Paragraph 23 of the NPPF states that in relation to town centres in decline LPAs 'should plan positively for their future to encourage economic activity.' Allocating comparison (as well as other types of retail) floorspace more widely across the District would provide an opportunity to ensure that the other towns (seaside towns in particular) have a diverse retail offer that is economically resilient.

Q7. What is the justification for stating that the quantitative level of retail need should be regarded as a 'guide' rather than a 'target'? Does the Plan allocate a range of suitable sites to meet the scale and type of retail needs as required by paragraph 23 of the Framework? How does the Plan ensure that the needs for retail will be met in full and will not be compromised by limited site availability?

- 2.7 Policy SP06 of the Local Plan generally addresses provision for town centre uses across Thanet's main town centres. The supporting text to this policy identifies that there is capacity within the District for additional comparison, convenience and A2-A5 specific floorspace. The text further identifies that convenience retailing is currently skewed towards larger, out of centre outlets and that the Council would like to encourage more convenience provision within the coastal town centres (paragraph 2.11).
- 2.8 We recommend that the Council identify that in some cases these stores may be located in areas outside of designated primary and secondary frontages, such as within the Margate Seafront and Harbour Arm, or in future development within designated Opportunity Sites. This could then be further expanded and justified in the area specific policies, including SP08, specific to Margate, ensuring the policies are unambiguous. It is acknowledged that these convenience facilities should not directly compete with the retail offer contained within Margate's primary and secondary frontages.

Issue 3 – Margate (SP08)

Q2. Is it clear to decision-makers, developers and local communities how the Council would consider whether a proposal for new development reduced the attractiveness of Dreamland or its leisure/tourism potential?

2.9 Part 4) of Policy SP08 relates specifically to protecting the future of Dreamland. While the policy is important in providing a policy basis for safeguarding the existing facility, we consider that more direction could be included to ensure the future viability of the facility as both an amusement park and as an events facility. For example, we recommend the inclusion of text that encourages Dreamland to become a year-round attraction by promoting development that would support this year-round function, such as a more diverse offer of events spaces. At present, Dreamland has a number of large spaces that are used for events. Given the existing spaces, there is potential for Dreamland to further expand its existing events repertoire including for music events, festivals, weddings and conferences. Being able to host an array of events will contribute to the long term viability of the facility, and help Dreamland and by association Margate, to become a year-round destination.

2.10 By including additional direction and guidance around what would be defined as improving the 'attractiveness' of Dreamland, the intention of this Dreamland-specific policy will become clearer.

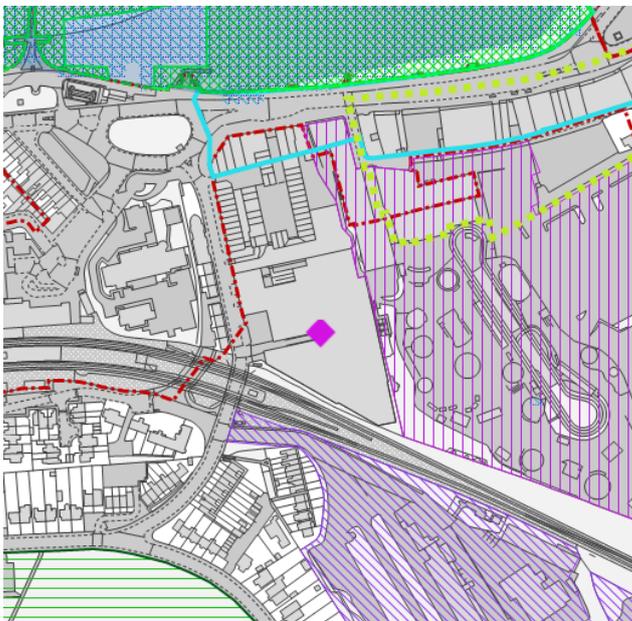
Q4. Does the Plan adequately define the extent and purpose of the 'Opportunity Sites'? Is it clear to decision-makers, developers and local communities what is required of proposals for new development in these areas?

2.11 Part 5) of Policy SP08 provides guidance for future development at key opportunity sites within Margate. One such opportunity site is the Arlington site, which, apart from the existing residential tower and associated parking, is largely vacant and underutilised. The Arlington site is currently separated into two parts; the north part of the site includes the existing residential tower and vacant shop units and courtyard below, while the south part incorporates the largely underutilised multi-storey car park. The relevant part of the policy states:

There are Opportunity Sites identified on the Policies Map which are considered suitable for mixed use town centre development. The ultimate goal of redevelopment of these sites is regeneration. Residential development will be considered acceptable where this does not conflict with the area based criteria above.

- 2.12 The policy mapping indicates the presence of an opportunity site with a 'diamond' as shown in Figure 1. The diamond identifying the Arlington opportunity site is positioned in the southern portion of the Arlington site area, and does not provide any clarity about that extent of the area considered to be included within the opportunity site. The Arlington site as a whole presents a unique opportunity to provide a major mixed use town centre development serving Margate and it is considered that both the north and south part of the site should be included within the opportunity site designation. By including both parts of the site within the opportunity site designation, future development proposals will be able to more comprehensively accommodate a mixed use town centre development as is directed by Policy SP08. The mapping should therefore be updated to make it clear that the opportunity site consists of both the north and south Arlington areas. In addition, the policy wording could be updated to include clarification about the extent of the site.

Figure 1: Arlington Opportunity Site



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