

**Thanet District Council
Local Plan Examination**

Session – Hearing Day 11: Tuesday 21 May (afternoon session)

Matter 12 – Town and District Centres

Issue 3 – Margate – Policy SP08
Question 3

Hearing Statement on behalf of:

Royal National Lifeboat Institution (RNLI)

Statement Prepared by
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Matter 12 – Town and District Centres, Issue 3 (Question 3) – RNLI Statement

Thanet District Council - Local Plan Examination Matter 12 – Town and District Centres Issue 3 – Margate (Policy SP08) – Question 3

Introduction

1. This statement has been prepared to support the representations made on behalf of the RNLI and to address Inspector's Question 3 in respect of Matter 12, Issue 3, as follows:

Question 3: 'Should Policy SP08 refer to resilient design, taking account of Margate's coastal location and the need to consider climate change and flooding? Additionally, would a reference to the need for development essential for public safety in the Margate Seafront and Harbour Arm area be justified?'

2. This statement should be read alongside the RNLI's representation submitted as part of the statutory consultation on the emerging Local Plan; specifically representations submitted in October 2018 in relation to the Pre-Submission Draft Thanet Local Plan to 2031 on paragraphs 2.23-2.33 (comment ID 632) and Policy SP08 – Margate (comment ID 633).

Background

3. The RNLI, through its volunteer lifeboat crews, provide a 24-hour rescue service in the UK and Ireland. To do so, they rely on the safest, most capable and reliable lifeboats and suitable stations to launch from. There are 238 lifeboat stations which are required to protect and launch lifeboats and provide associated crew facilities.
4. Margate's lifeboat station is located on the promenade next to the Turner Contemporary art gallery. Margate lifeboat station currently houses a Mersey-class all-weather (ALB) lifeboat and forms a critical part of the search and rescue service provided by the RNLI on behalf of HM Government across the River Thames Estuary.
5. The current Mersey-class lifeboat, launched by a submersible tractor unit and carriage mounted slipway, is reaching the end of its operational life having been introduced in Margate in 1991 – now in its 28th year of service. This is true of all Mersey-class lifeboats around the coast.

Matter 12 – Town and District Centres, Issue 3 (Question 3) – RNLI Statement

6. The RNLI strategic plan (by 2024) is to achieve a 50% reduction in drowning in the UK and Ireland, a reduction in serious incidents and have effective drowning prevention strategies in place in the highest risk areas internationally. Critical to achieving these goals is the introduction of the 25-knot all-weather lifeboat fleet.
7. As part of this 25-knot all-weather lifeboat fleet, a Shannon-class all-weather lifeboat (ALB) is due to replace the Mersey-class ALB in Margate. The Shannon is the first all-weather lifeboat propelled by waterjets instead of propellers making it more agile and manoeuvrable and allowing it to operate in shallow waters. The Shannon is capable of 25 knots, enabling the RNLI to reach those in need faster and have greater range.
8. As a result, a new lifeboat station is required in Margate to accommodate the new Shannon-class ALB, the existing D-class Inshore Lifeboat (ILB), the existing lifeguards equipment, and the associated crew facilities and visitor engagement and education spaces.

Need for a New Lifeboat Station in Margate

9. The existing lifeboat station cannot accommodate the larger new Shannon-class lifeboat. Nor can the existing lifeboat station be extended to accommodate the Shannon-class lifeboat as the lease is due to expire in March 2020 and the land owner (Kent County Council) has stated that a new long term lease will not be granted due to future development aspirations for the Rendezvous Opportunity Site as identified in the draft Thanet Local Plan.
10. The current access route to launch the Mersey-class lifeboat is down the existing slipway into the harbour. This access route for the Mersey-class lifeboat is already compromised by its location and the surrounding infrastructure and is often impeded by pedestrians and parked cars.
11. As with the current lifeboat, the new larger Shannon-class lifeboat uses a carriage mounted slipway as this is the only viable form of launch due to the depth of the sea in the Margate area.
12. With the new larger Shannon-class submersible tractor unit and powered carriage mounted slipway it is impossible to launch using the existing slipway due to conflicts with the surrounding infrastructure and the location of the slipway.

Matter 12 – Town and District Centres, Issue 3 (Question 3) – RNLI Statement

13. For these reasons a new lifeboat station is required in Margate to accommodate the Shannon-class ALB, D-class ILB, lifeguards and associated facilities.

Location of a New Lifeboat Station in Margate

14. Critical for the location of a new lifeboat station is the ability to safely launch the Shannon-class lifeboat in all weather conditions, which includes even the worst storms. The RNLI have identified that the only suitable location for a new lifeboat station is the area protected by Margate Harbour Arm.
15. This is due to a number of factors including:
- the rocky nature of the majority of the foreshore along the coast around Margate which prevents safe launch and recovery of the Shannon-class lifeboat.
 - the exposed nature of the coast around Margate preventing safe launch in all weather conditions.

Proposed Changes to the Draft Local Plan

16. For the plan to be made sound, it must include specific policy support for the provision of a new lifeboat facility in Margate.
17. Therefore, as set out at the pre-submission stage by the RNLI, additional text and sub policy, to Policy SP08 – Margate, must be included in the draft Local Plan to safeguard the replacement RNLI facility as follows:

The current RNLI Mersey-class all weather lifeboat has been in service in Margate for over 25 years and is nearing the end of its operational life. In 2014 the RNLI commissioned the modern and more capable Shannon-class all weather lifeboat to replace the Mersey-class all weather lifeboat and a phased roll-out across the UK is well underway. As with the current lifeboat, the Shannon-class all weather lifeboat uses a carriage mounted slipway as this is the only viable form of launch in the Margate area due to the depth of the sea. The RNLI have identified that the existing lifeboat station will need to be replaced with a larger facility to accommodate the new Shannon-class lifeboat and relocated to enable the lifeboat to be launched and recovered without obstruction.

Matter 12 – Town and District Centres, Issue 3 (Question 3) – RNLI Statement

The Council acknowledge the need for a new lifeboat station in Margate to house the new Shannon-class all weather lifeboat and associated facilities.

New Sub Policy SP08 3)A

The Council will support proposals for the relocation of the RNLI lifeboat station in Margate to house the new Shannon-class all weather lifeboat where it does not conflict with other policies of this plan, or where it can be demonstrated that there are no more appropriate sites that would be capable of accommodating a lifeboat station given the RNLI's operational requirements.

18. In addition, Policy SP08 3) Margate and the Harbour Arm should also be amended, as proposed by the RNLI at the Pre-submission stage, to ensure an appropriate strategy is in place which recognises that development that is essential for public safety will be supported within the seafront area of Margate and the Harbour Arm. The text highlighted in bold below should be added to Policy SP08 3) to achieve this:

*'Within the seafront area of Margate and the Harbour Arm as indicated on the Policies Map, leisure and tourism uses will be permitted, including retail, where they enhance the visual appeal of these areas and protect the seafront character and heritage. Residential development above ground floor will be permitted. **Development essential for public safety will also be permitted.**'*

19. The RNLI are willing to discuss, at the hearing, alternative policy approaches to secure and support the development of a new lifeboat station in Margate.

Consistency with National Policy

20. The provision of a new lifeboat facility promotes public safety and provides for community needs which is supported by, and consistent with, paragraphs 91, 92 and 95 of the National Planning Policy Framework (2019) that respectively state:

'91. Planning policies and decisions should aim to achieve healthy, inclusive and safe places...'

'92. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

Matter 12 – Town and District Centres, Issue 3 (Question 3) – RNLI Statement

a) plan positively for the provision and use of ... community facilities ...and other local services to enhance the sustainability of communities and residential environments;

b) ...'

'95. Planning policies and decisions should promote public safety...'

Conclusion

21. The above identifies that there is a need for a new lifeboat station in Margate. The RNLI have identified that the only suitable location for a new lifeboat station is the area protected by Margate Harbour Arm.
22. For the draft Local Plan to be made sound, it must include the additional text, new sub policy SP08 3)A, and changes to draft Policy SP08, as set out above. This will enable the draft Local Plan to be:
 - positively prepared – meeting the areas need for a lifeboat station;
 - justified – as an appropriate strategy given the need, alternatives and evidence of the requirement for a new lifeboat station in Margate;
 - effective – as it will enable the development of the areas need within the plan period; and
 - Be consistent with national policy – promoting public safety and providing for community needs.
23. Should the proposed new policy and changes proposed to Policy SP08 not be considered acceptable, the RNLI are willing to discuss, at the hearing, alternative policy approaches to secure and support the development of a new lifeboat station.

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