

BROADSTAIRS TOWN TEAM



*Response to
The Draft Thanet Local Plan
Preferred Options
Consultation*

March 2015

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This is the response from Broadstairs Town Team to The Draft Thanet Local Plan Preferred Options Consultation

We are a group of local residents and business people concerned with the wellbeing of our town. We proactively involve ourselves where we can see opportunities to make a positive difference. The Town Team currently consists of six executive members and calls upon a wider group of diverse local volunteers to deliver our varied projects, which include but are not limited to Brush up Broadstairs and Gardening Groups, Broadstairs Summer Sounds, Revive and Thrive, station signage, a new welcome to Broadstairs sign for the station and

we initiated, launched and now run the Broadstairs Town Shed. We also liaise with and provide support, where we can, to initiatives owned by other organisations, for example the Broadstairs Neighbourhood Plan Steering Committee and the Destination Management Plan, Friends of Ellington Park, etc. We have also established good working partnerships with local colleges and schools to work together for the greater good of Broadstairs.

As Town Team we work very closely with and share information with our sister organisations in Ramsgate and Margate, to the same end.

Context

- We have struggled to develop an intelligent comprehensive response to the draft Local Plan when robust infrastructure provision is still to be addressed through an Infrastructure Delivery Programme, the SHMA out of date, additional car usage has not been estimated, regional issues are not explained and the future of the Airport site is so uncertain.
- We have tried to respond as comprehensively as possible to the document. Where we have not commented it can broadly be taken that we are in agreement with policies, as there is clearly much that is good in the Plan – for example the protection of the green wedges and commitment to enhance green infrastructure, or they are not within the scope of our remit - for example housing expansion in locations in Birchington or Westgate. It may be there are additional elements of the Plan that we have not commented on that we will in future wish we had, but we may have missed. We can only say that as a small group of volunteers we have done our best to feed in to this process in the time available.

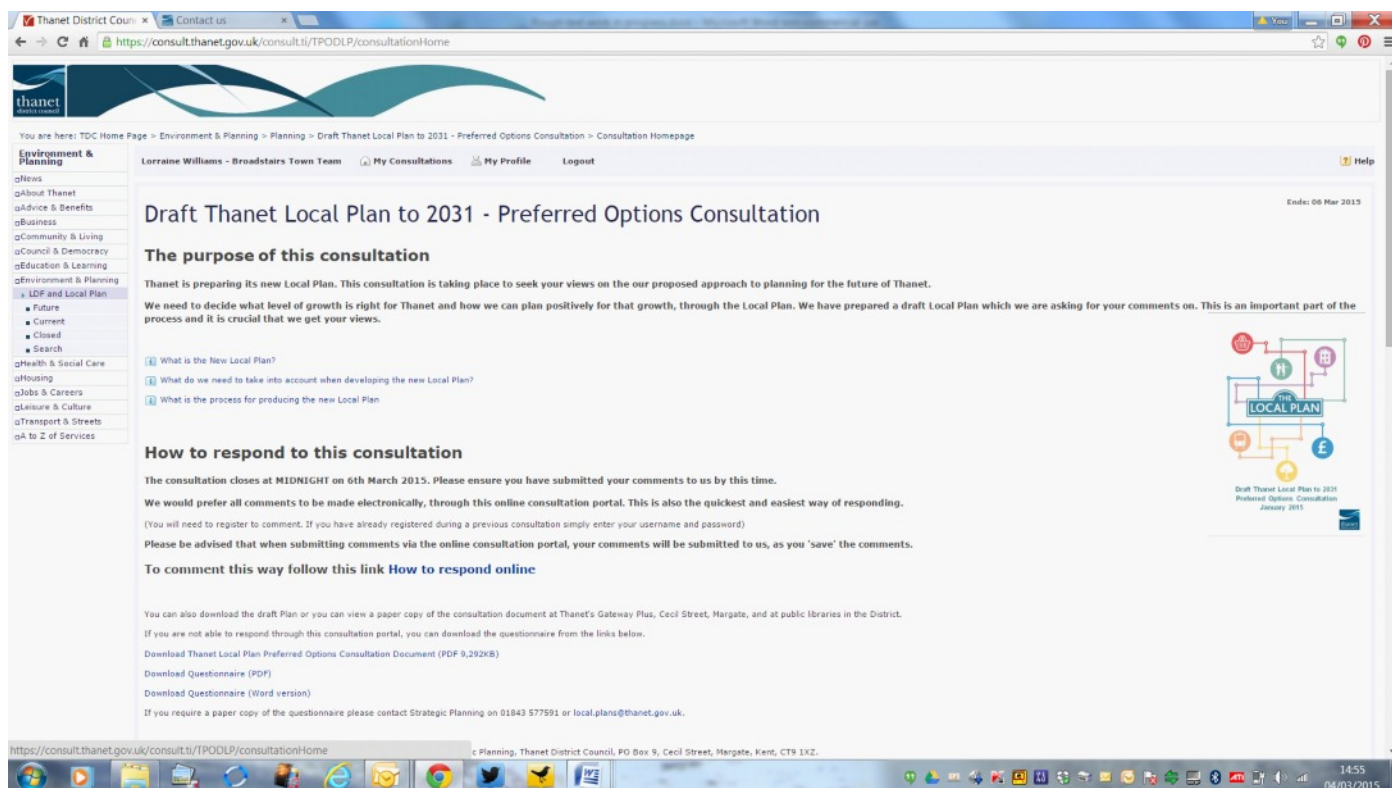
Our response to the consultation process

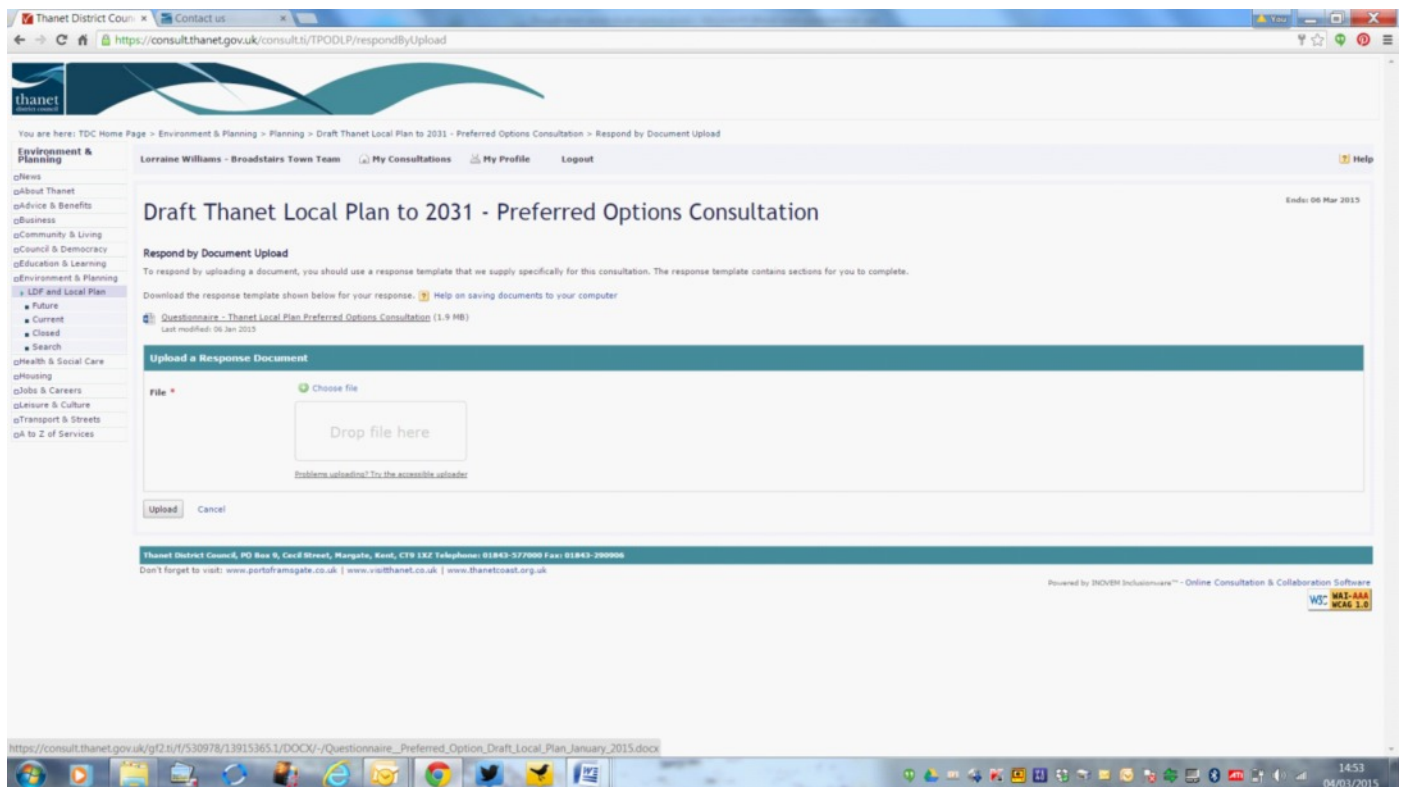
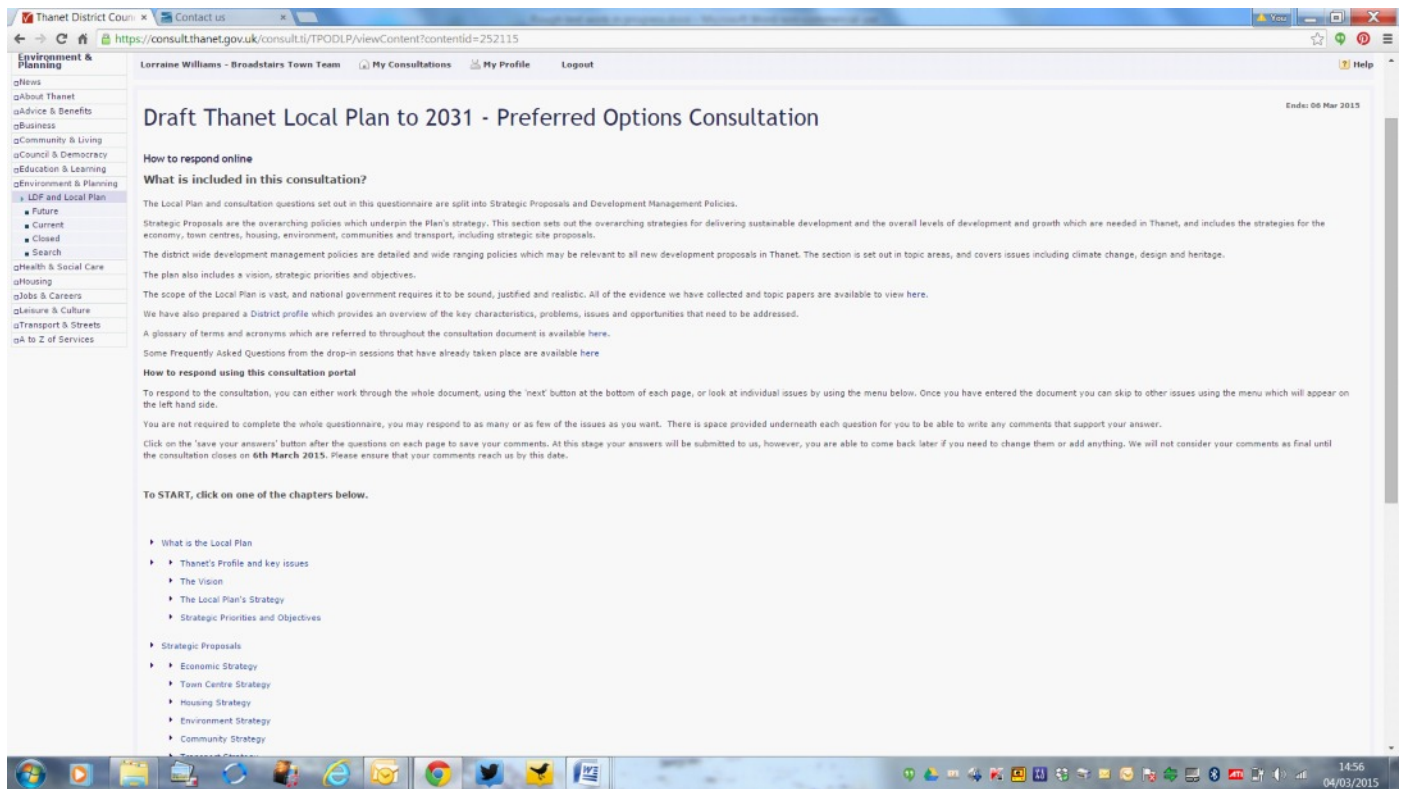
- We feel that the consultation period was too short for the large amount of information contained within the Local Plan and associated documents.
- Very many people have commented to us that they have struggled to give the Plan the attention they would have liked in the given time and also that it has been difficult to locate the Plan document on the council website.
- The documents were criticised by the Campaign for Plain English and both the Draft Plan and the response questionnaire were extremely long and poorly signposted.
- The response questionnaire headings did not correspond to the headings at the start of the Draft Local Plan which made it more difficult to navigate. We were some way into the process before we worked out that the questionnaire headings relate to the policies at the end of the document. Better signposting or a different numbering system may have made this easier. Equally the questionnaire itself could have been structured differently to make it more user friendly and enable more meaningful engagement. The simple fact that the comment boxes in the questionnaire were so small and could only be expanded by someone who is more than averagely competent with word processing software, is a barrier to the engagement process.
- The web pages for the Consultation process were also complex to navigate and in some ways misleading, for example, the text on the web pages strongly gave the impression that the only way to respond to the consultation was to fill out the 99 page questionnaire which we know many people

found intimidating and will have been a real barrier to engagement. Please look at the screen grabs below as evidence of this point.

- We were pleased that when we sought clarification on what form of response was acceptable we were advised on the phone that it was not necessary to complete the questionnaire document and so we are submitting this document. However we remain concerned that many people will have been deflected from the process by the very high barriers to return responses which were put in place.
- The Draft Plan made no mention of the Neighbourhood Plans for the area which are being progressed now. These should be referenced to avoid confusion and provide context for non expert readers in future, to enable community engagement with the planning framework overall. The Draft Plan document explicitly states that it is the sole planning document for the area which will immediately be confusing for people who consult it in the future and are not planning experts. The overall planning framework and the role of the Neighbourhood Plans in relation to the Local Plan needs to be clearly explained if Localism is to be effective.
- BTT requested an open meeting for the community to discuss the draft document and our request was turned down by TDC, which was very disappointing. The drop in sessions which were held in Broadstairs centre and Westwood Cross attracted a lot of interest but many people commented that they came away with more questions than answers and that they wanted an opportunity for further collective discussion and explanation.
- Many people in the town have commented that they felt the consultation process was inadequate and that they did not feel they had the opportunity to understand and question what is being proposed.

The screengrabs below show illustrate the issues with the consultation web pages.





The Vision

We wholly support the stated vision for Thanet as a whole and Broadstairs specifically.

As an aside however, as this is not our focus but we feel is important to note - Cliftonville appears to have a far greater development potential than the Plan has recognised, it already has one of the largest and most vibrant high streets in Thanet and with a rapidly expanding creative community is transforming at a very fast pace. We believe that greater recognition and strategic development of the potential of the Cliftonville area would be beneficial for Thanet as a whole.

This may also be the case for Birchington which also has a long high street and several specialist retailers such as Quex Barn and the brand new Curiously Kentish delicatessen, etc, which have a very wide catchment area covering the whole of Thanet and destination tourists.

The Area Specific Objectives – for the Coastal Town Centres and District Wide - must include supporting a strong and cohesive community. It is not sufficient to have this stated in other supporting documents, we believe it should be stated clearly at the heart of the Local Plan, for this document to be effective in achieving this vital goal.

Housing Need

- We do not believe there is a strong evidence base to suggest Thanet has a Housing Need for 12,000 new dwellings. The SHMA is out of date and has not been revised to take account of recent changes such as the greatly reduced council house waiting list and loss of recent employment at Pfizer and Manston airport. In addition there is a high quantity of excess empty homes in Thanet, when compared with the national figure, and south-east England in particular, and this, to us, demonstrates that more work is needed to determine whether the out of date SHMA figures can be taken to indicate the real housing need in the area. We note that 12,000 is almost the exact number arrived at if we were to take the total number of houses the government has said are required in England overall and divide it by the number of Local Authorities as a whole. The methodology used to arrive at this number would seem to require thorough scrutiny.
- The fact there is an unusually high number of empty homes locally, strongly implies to us that demand for housing in Thanet may be weaker than the demand in other parts of the south-east. Thanet is 11th out of 346 councils for empty properties with some three and a half thousand of them and over a thousand of those “long term empty” – source Empty Homes Agency 2012 statistics.
- Looking at population density in Thanet in comparison to other areas, adding 12,000 homes to an area already more densely developed than comparative areas would seem to be a risky strategy that is likely to compromise the quality of life here, particularly where infrastructure plans are lacking.
- We feel that the evidence base must be much more robust before a sensible figure can be arrived at to say how many new houses will be required.
- We understand that the district council is still at a very early stage in working towards an Infrastructure Delivery Programme which would seem to be a vital bit of the jigsaw for a robust Local Plan.
- We understand that under the national Empty Homes Policy, brownfield sites are expected to be utilized before Greenfield. The designation of Greenfield sites for development seems disproportionate to maintain a balanced and pleasant living environment.
- Government policy is to protect the green belt and we are advised that Thanet has the most Grade I soil in Southern England. It does not make sense to us to compromise this with the level of increased housing land proposed in the plan.

Town Centres

- The designation of Westwood Cross as the “main town centre for Thanet” makes no sense to us and we see as highly contentious, indeed dangerous for the area as a whole. Westwood Cross is an out of town shopping area which is convenient for all three towns and may be designated a centre in its own right but cannot be prioritised above the three established towns of Margate, Ramsgate and Broadstairs, which are the areas where most people actually live and work.
- There is already considerable unease in the area at how many national retailers have left the existing town centres and moved to Westwood Cross. While clearly the shopping centre provides an

environment for large footprint stores that the town centres cannot accommodate and thus likely provides all Thanet communities with a richer shopping experience we would otherwise have, if Westwood Cross is given this designation the ramifications for the area as a whole could be far reaching and very unfortunate.

- Potential Inward investors must not be given the impression that Thanet's main town is simply an area dominated by generic chain stores, lacking in character and with virtually no community, when we have three vibrant towns with much to offer in terms of lifestyle and amenities.
- Westwood Cross currently serves a supporting function to the three towns, providing conveniently located shopping and other amenities to all three but the risk is that if it were to be prioritised in the town centre hierarchy it could further suck the life from the established centres which are all currently struggling to reinvent themselves, particularly with regards to loss of community levy and drawing services away from the existing towns.
- The success of Westwood Cross as a shopping centre is evidence that Thanet residents are comfortable moving across the Isle for shopping and other activities. The Plan seems not to recognise that each of the three established towns of Margate, Ramsgate and Broadstairs also have a catchment not just of people local to each town and tourists but of Thanet residents as a whole and beyond.
- Many Thanet locals use the three main towns in the way that big city dwellers will use a range of areas in a city, we are very used to moving freely between the three existing towns and the Westwood Cross area for different business and leisure purposes: by way of illustration - Margate could be likened to Shoreditch, Broadstairs to Hampstead, Highgate or Blackheath and Ramsgate can perhaps be compared to London's Southbank or Islington, for their appeal and function in local life. Westwood Cross is our local equivalent to the Westfield Shopping centres currently situated in Stratford or Shepherds Bush. Residents will go between the towns for example – to Margate to visit an art gallery, shops, bars and restaurants, to Ramsgate to catch a show, eat out or attend a yoga class, to Broadstairs for some great live music, to eat out and to Westwood to buy some new pants, socks or a microwave. All of the established towns have specialist, high quality, destination shops, although they may be small they are important and we need more of these to be encouraged. Each of the established towns deserves and can support a vibrant high street and must not be de-prioritised in favour of Westwood Cross.
- It is also vital that the communities across Thanet, not just those immediately at Westwood, will benefit from the community levy on development projects in the Westwood area. We fear this may not happen if Westwood is defined as a distinct and separate town – which it most certainly isn't.
- Online and convenience shopping trends mean the future of large retail outlets is far from certain and we must not find our future planning policies are focussed on defending a style of shopping that is already arguably in decline to the detriment of focussing on our vibrant town centre communities, which are all now in a state of regeneration requiring strategic support and close attention. Indeed a number of big name retailers, such as Top Shop, are due to leave Westwood Cross shortly. Planning for each of the High Streets should incorporate the premise that each high street has a catchment of the population of Thanet as a whole (not just each individual town), plus visitors from further afield.
- On the subject of Westwood Cross shopping area, we are pleased that the policies in the Plan aim to achieve improvements to access around the site by foot.
- The Town Centre strategy notes that district centres must not threaten the success of the established town centres. We are concerned that constraining limits on commercial retail development in Cliftonville in particular should not be imposed as the Northdown Road high street of Cliftonville is naturally and rapidly evolving in a positive way which we believe should be encouraged. As stated at the start of this document, we wonder if this concern may also be applied to Birchington, while neither Cliftonville nor Birchington are "covered" as such by Broadstairs Town Team, of course, we still see them, as well as the rest of Thanet, as part of our wider local community and we want all areas to thrive.

Broadstairs,

Policy SP10

- Broadstairs Town Centre has not been adequately designated on the map as it excludes the key retail area around the station and the Broadway and the top of the High Street. This area contains several destination retailers including Fruit de Mer and is very clearly a part of the Town Centre, requiring protection and development as such.

Policy E04

- We see no reason why policy E04 should preclude the possibility of a hotel development at the bottom of the High Street, there is already one very successful hotel there (The Royal Albion) and given the long empty units at 8-10 High Street which are currently a terrible blight on the area, we would think that any viable commercial use in this location providing it is not detrimental to the character and amenity of the town, should be considered favourably. We are concerned that policy E04 may be overly proscriptive and limiting of potentially positive development in the town.

A Town Team member commented:

“The centre of Broadstairs has morphed over the last few years, it now provides probably the best group of eateries in Thanet. They are far superior to anything that Westwood Cross provide and support local independents. What we need to do is to enhance this by making Broadstairs Town Centre a positive destination for shopping as well as eating. There is an opportunity to make Broadstairs a “destination” town that could rival other towns across the South East. If Thanet District council supported a clear vision for Broadstairs, that would help to attract more distinctive and high quality retailers, we could have a town centre that had a positive mix of restaurants, cafes, independent shops and area suitable for major retailers too where they do not need to have large stores – and this would also encourage more visitors who will stay here for longer.”

- We recognise that the Local Plan broadly encompasses such a vision. We are actively working with the Town Council to develop more detailed vision and plan to deliver it through the Neighbourhood Plan process. We note that central being able to deliver this vision will be the need for funding to support community orientated development and thus emphasise again the importance of not allowing any policy to reduce the obligation for developers at Westwood to pay a levy that will support the communities it serves.

Beaches

- We see no reason why any change of commercial use for premises on the promenade and beachfront should automatically be resisted. Given the dynamic nature of the economy and the need to maintain a vibrant and pleasant town centre, we feel that change of use applications on the beachfront or promenade should be considered on their merits and for how they would affect the destination as a whole, rather than having a rigid policy set out which risks stifling innovation and creative use of premises. Policies should be drafted that actively encourage new businesses where there are viable opportunities that will benefit the town as a whole.

Heritage

- The document has little to say about Broadstairs’ specific heritage. Town Team members feel passionately that the character of our town needs more than to be protected and preserved; it also requires imaginative and strategic development. We feel that more time is required for appropriate policies to be developed that will support that aim and it seems that looking at the long list of policies for Ramsgate and Margate that Broadstairs needs have been somewhat overlooked, perhaps because the town is perceived to be fine as it is and in less need than the other two towns.

While the town may be relatively more affluent than its neighbours now, with a rapidly ageing population and arguably inferior cultural amenities to the other two towns, it's future is clearly at risk and requires more proactive policies to be drafted.

- We are particularly concerned at recent retail signage starting to appear in the town which appears contrary to the charm and character of the area – most notably the large red illuminated digitally animated sign, as indeed the main sign above the entrance, in the new chip shop at the bottom of the High Street which has replaced the old Victorian Tearooms. We believe a strong policy is required to safeguard against this kind of unsuitable signage that will compromise the appeal of the town centre.
- We understand that Canterbury has strong policies in place about store frontage appearances and we would like to see some similar policies developed here that would provide greater protection for Broadstairs historical character.

Community

- As noted above, we are concerned that Broadstairs and our sister towns and surrounding villages could lose out on vital community levy funds if Westwood is designated as separate to the communities it serves. We may also lose out on the opportunity to bid for future funding pots available for Coastal re-development for the same reason.
- We have a strong and vibrant community in Broadstairs with strong links across Thanet (and beyond). Community facilities are meagre for a town of our size and the Local Plan.
- A joined up approach to development across Thanet is needed, that will mean development at Westwood will benefit all of the residential the communities it serves.
- Broadstairs Community Centre at Retort House has been in limbo for over ten years and requires urgent upgrading.
- As well as community amenities it is vital that employment is encouraged in our town centres and that office space in particular, as well as retail, is encouraged.
- Conference and meeting room space is also desperately needed in the Town Centre, both for businesses here, businesses elsewhere who would use such facilities if they were available and thereby benefit the economy of the town overall and local community groups.
- Pierremont Hall until December 2014 provided office space for several local businesses and community /arts organisations as well as the Town Council and offers excellent meeting room space, yet recently most tenants have had to leave because of essential maintenance of the building not being kept up. There is clearly a need and opportunity for Pierremont Hall and the other buildings in Pierremont Park to be redeveloped with the existing character retained and amenities enhanced, including the green infrastructure and children's play area. The Local Plan should perhaps say something about this as the park is strategically located at the very heart of Broadstairs and has a vital role to play in building the town's strong community and appeal for visitors. The Pierremont Hall building is the jewel in Broadstairs Crown for so many reasons and its future is of paramount importance to business owners and residents alike.

SP37, Connectivity

- We feel it is important that the Local Plan is amended to state clearly that the current high speed train service is between all three Thanet towns and St Pancras and not just Ramsgate –and that no

development should be permitted which would lead to any of the three towns becoming less well connected to London than we are with the current service. The current service is vital for commuters and home workers who need to be mobile. Home workers are a growing element of the population in Broadstairs and it largely is the town's excellent connectivity which is enabling this kind of employment here.

A Town Team member commented:

"Broadstairs, in conjunction with other Thanet seaside towns, has the opportunity to be at the forefront of the changes in working patterns. Increasingly, highly skilled resources, who are paid significantly over national averages, are drawn to a positive work/life balance. What people like is the ability to easily access major European cities while living in a pleasant environment with good shops and restaurants. Broadstairs has an enviable position of having easy access to London (via HS1), Paris/Brussels (via Eurostar) and Frankfurt/Basel/Geneva/Amsterdam (via London City airport). This is in conjunction with affordable good quality family housing and outstanding schools. However, this is almost a best kept secret, there is little promotion of Broadstairs in this respect. If you can affect the spending power in the area, you will automatically see benefits across all areas of Thanet. This could create the sort of benefit that is seen by other seaside areas like Whitstable or Brighton"

- We note that the destination management plan is addressing the promotional needs of Broadstairs and Thanet as a whole and we trust that the Local Plan and DMP are closely aligned.

Parking

- TPO5 – Coach Parking – the spaces for coach parking at the Vere Road car park referred to in the Local Plan have been taken away by the recent residential development on the car park there and access by foot to the park and seafront via the allotments at the back of this car park has also been removed. We trust the parking provision and access for foot traffic will be reinstated when the development is complete but as there are now houses in this location, we assume and are concerned that there will be fewer coach parking spaces, if any when/if the facility becomes available again. The Local Plan must make provision to replace lost coach parking space, so that coaches will not be less likely to continue coming to the town. The number of coach parking spaces required should be clearly stated and the need must be met, otherwise the town will suffer greatly should we lose coachloads of tourists coming here for the want of appropriate parking provision.
- **Map 28** of parking in Broadstairs Town Centre excludes a large part of the centre, from halfway up Pierremont Park on up the High Street to the station and the Broadway. This should be amended in the next draft.

A Town Team member commented:

"The parking in Broadstairs currently does not support the needs of the local stakeholders. The car parking facilities, and the charges associated with them, force people in to local housing areas. This creates friction in various areas (for example, Edge End Road and the parking for the schools). During the seasonal periods this is even worse, with people parking on any possible streets available. What is also an issue is that during these periods the routes in to Broadstairs become almost grid-locked. Perhaps consideration should be put towards flexible parking areas, maybe with seasonal "park and rides". During the low seasons (October to March) parking fees are kept in areas that could be used by Thanet locals. These should be reduced or removed, the aim would be to increase the footfall bringing an inevitable increased spend in the shops and restaurants. This would balance the free parking that is provided in areas where the shops are major retailers, not local independents."

- As parking is such an issue in the town we believe that a policy should perhaps be drafted indicating willingness to look favourably on a development proposal for significant centrally located car park facilities ,such as an underground car park, if such a car park could be created without damaging the character of the area.

Green spaces

- We note that the Town Council has submitted corrections to the list of designated green spaces in the town and we believe this to be correct.