

Thanet District Council

CLIFTONVILLE DEVELOPMENT PLAN DOCUMENT

Statement of Consultation

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Cliftonville Development Plan Document

Statement of Consultation

Introduction

The Planning and Compulsory Purchase Act introduced the Local Development Framework (LDF) format of planning policy. The Thanet District LDF, together with the Regional Spatial Strategy (South East Plan) will become the statutory Development Plan for the District. The Cliftonville Development Plan document (DPD) will form part of the LDF.

The purpose of the Cliftonville DPD is to implement tighter planning controls in the Cliftonville West Renewal Area to prevent the continuation of small, poor quality, high density developments which are a significant contributory factor to the social and deprivation issues the area is currently experiencing.

One of the requirements of the Planning and Compulsory Purchase Act is for each local authority to produce a Statement of Community Involvement (SCI) which sets out how and when the community will be involved in the development of planning policy documents. The Cliftonville DPD has met the requirements of the SCI during the formal stages of the planning policy process:

Regulation 25 (under 2004 Regulations) – questionnaires, forums, mailshot, newspaper adverts, documents and comments form available on web or hard copies

Regulation 26 (under 2004 Regulations) – questionnaires, mailshot, newspaper adverts, documents and comments form available on web or hard copies

Regulation 27 (under 2008 Regulations) – model form, mailshot, newspaper adverts, documents and form available on web or hard copies

Continuing informal community involvement has taken place in between the formal stages.

Consultation with Members and formal Council procedures

Regular meetings are held with five cross-party Members to keep them informed of progress of the Local Development Framework – these meetings are formal and known as the Local Development Framework Working Party.

The Working Party have been kept up to date with the general progress of the DPD, and each stage of the planning process has been discussed at the working party and agreed, prior to reporting to Cabinet or Council.

The Cliftonville Document has been reported to the following Council meetings:

Item Reported	Council Meeting	Purpose of Report
Preferred Issues and Options	Cabinet – 20 th March 2008	Agreement for Public Consultation
Petition Received on Preferred Options consultation	Cabinet – 18 th September 2008	Referral of petition from Council to Cabinet
Petition Responses	Cabinet – 12 th February 2009	Progress on responses to the petition
Petition Responses	Council – 26 th	Report back to council within Procedure

Item Reported	Council Meeting	Purpose of Report
	February 2009	Rules for a petition
Publication Document	Cabinet – 7 th May 2009	Agreement for Public Consultation and subsequent Submission
Publication Document	Council – 21 st May 2009	Agreement for Public Consultation and subsequent Submission

Pre-Submission Consultation

A policy restricting further development of on-bedroom flats in the Cliftonville West Renewal Area was adopted by the Council, as a Council policy, in December 2006.

Extensive consultation was carried out during the process of adopting this policy during September-November 2006. The consultation carried out under Regulation 25 was based on other issues identified from this consultation.

Consultation Pursuant To Regulation 25(1)

An Issues and Options paper formed the basis for this consultation.

A total of 218 groups and individuals were contacted comprising:

- Local groups and organisations (as set out in the SCI, including Age Concern, residents groups/forums, health/education groups)
- Hard to Reach groups identified in the SCI as appropriate (contact with the Youth Council, Gypsies and Travellers, Surestart , Help the Aged/Age Concern)
- Respondents to the Cliftonville Policy consultation carried out in 2006
- Estate Agents/Developers/Landlords
- Those who had requested to be kept informed
- Statutory Consultees/DPD bodies as appropriate

How this consultation was carried out:

- Letter and questionnaire sent out on 15th August 2007 inviting responses and attendance at one of two forums, with the consultation period running from 15th August until 12th October 2007.
- Questionnaires available at Council Offices
- Questionnaires available at all local libraries
- Questionnaires distributed to the St Pauls Community Centre, and Thanet Community Development Trust, both located in Cliftonville West
- Electronic questionnaire on website
- Press release appeared in Thanet Times, 4th September 2007
- Two forums were held – one in the afternoon and one in the evening, to maximise the opportunity for people to be able to attend:
 - 4th September 2007, 7.00pm: 7 Attendees
 - 10th September 2007, 3.00pm 15 Attendees

The forums took the following format:

- Arrival and Coffee
- Welcome
- Introduction and Presentation
- Ice-Breaker
- Discussion session (structured discussion on issues and options for Cliftonville West)
- Plenary session (Feedback and comments from participants)
- Closing remarks/close

Summary of the main issues raised in those consultations

53 questionnaires were returned - see Appendix 1 for a summary.

The key issues that arose from the forums can be found in Appendix 2. A letter enclosing a summary of the results of the consultation was sent to all respondents on 14th November 2007.

How those main issues have been addressed in the Preferred Options Document

The Issues and Options included discussion about the minimum standard size of two bedroomed flats in the Cliftonville West Area. There was a strong message that the existing standard of 50 m square, as set out in the Conversion to Flats Supplementary Planning Guidance, was not adequate. However, a range of alternative sizes were suggested, and a suggestion was made that a standard should be set for the amount of usable space, rather than the total floor area. Some people commented that they could not visualise the sizes to be able to make a reasoned judgement. It was considered, therefore, that this issue would need more research and be supported by more detailed public consultation in order to arrive at a reasoned and meaningful standard that could be applied. The Preferred Option was therefore considered to be for a comprehensive review of the Supplementary Planning Guidance to be carried out.

Comments were made about perceived overcrowding in Cliftonville West. To address this, an option was suggested to establish a maximum density for new dwellings.

One issue identified at the forums was a lack of family housing – the concentration of flats in the area being more suited to single people or couples. A lack of garden space for children to play in was also raised. The Preferred Options included policy suggestions for preventing houses that are currently suitable as family housing from being converted into flats, and restricting extensions to properties if it would result in the loss of garden space.

The subject of tourism was raised at one of the forums, and also during a discussion with officers from other council departments. Cliftonville might once again become a popular place for visitors, considering some of the regeneration initiatives taking place in Margate. There was concern that some existing hotels, or buildings suitable for hotel use, may be converted to housing, leaving little or no scope for tourist accommodation in the future. An option was therefore suggested for the retention of buildings for hotel use and supporting proposals for tourist accommodation.

Parking was an issue people felt strongly about, as expressed both at the forums and via the questionnaires. One of the options suggested was to encourage cycling by providing a secure, communal cycle storage facility. However, during the consultation it was considered that this would become a security risk, therefore the Preferred Options suggest a policy requesting that cycle storage facilities be provided in new developments.

Provision for refuse storage was raised during the consultation, and also by a Councillor. A lack of storage facilities, or convenient storage facilities, often results in rubbish bags being left in front gardens or on pavements creating an untidy environment. Consideration was given to this issue as to how it could be resolved and identified a problem, common to many properties in the area, that providing such facilities in mid-terrace properties is simply not feasible. A Preferred Option was therefore drafted to require appropriately designed refuse storage facilities to be

incorporated in all conversions or new developments, and that this could be situated at the front of a property if there is no alternative.

Other Consultations as part of the Issues and Options process

Internal consultation was carried out by way of a ‘brainstorming’ meeting on 8th October 2007 which included council officers from the tourism, renewal area, housing, private sector housing, development control and highways departments. The issues discussed related to the potential issues being considered for the Preferred Options, ie the one-bedroom flat policy, room size, extensions to hotels, parking and design. Issues that materialised from the meeting included:

- Various sources identified relating to standards for room sizes for future research
- Consider a policy retaining quality hotels
- Converting front garden areas for car parking detrimental – also reduces on street parking by two spaces

Representations on Proposals for a Development Plan Document (Pre-Submission Public Participation) Regulation 26

The consultation on the Preferred Options Document was carried out between the 18th April and 30th May 2008. Letters were sent to the same consultees on the database used for the previous consultation, totalling 242 groups and individuals. The number of consultees was higher for this consultation as it incorporated those new consultees who were involved in the Preferred Options consultation.

At a meeting of the Local Development Steering Group (comprising officers, councillors and representatives from the LSP) on 5th February 2008, it was decided that forums/workshops would not be appropriate this time as the area was suffering from ‘consultation overload’, due to recent consultations having been carried out by other departments.

It was considered appropriate at this stage to send a copy of the Preferred Options document and the comments form to Statutory consultees (Specific Consultation Bodies).

A letter was sent to the 242 groups and individuals advising them of the consultation, and enclosing the Proposal Matters.

Copies of the Preferred Options Document, comments forms and the Sustainability Appraisal Report were made available at the Thanet Gateway/Library, Cliftonville Library, St Pauls Community Centre, Cliftonville and online. The Proposal Matters were published in the Thanet Extra on April 18th 2008, and a press release advertising the consultation was published in the Thanet Gazette on April 18th 2008.

103 comments were received from 20 representors.

A Petition was also received, submitted by five Cliftonville Residents Associations, and signed by 641 signatories. The petitioners had commented on each of the issues and preferred options set out in the consultation document. The comments were broadly supportive of the initiatives set out in the document, along with suggested amendments and additions to be included in the Publication document.

Main Issues

The main issues from this consultation have been summarised in Appendix 2. The comments were generally supportive and several additions were suggested, although the majority of these would not be appropriate to include in this Development Plan Document as they relate to issues outside the realms of the planning system, or would not stand up to the tests of soundness. There were also some comments relating to the evidence base. A car parking survey, and a survey of hotels in Cliftonville have been carried out as a result of those comments.

Comments were made by the Government Office for the South East (GOSE) and Kent County Council that an Area Action Plan would be more appropriate than a Development Plan Document. Officers met with GOSE on the 17th July 2008 to discuss the issue – GOSE suggested the preparation of justification and a matrix to assess each option and whether they can be addressed elsewhere than in a DPD. The justification is set out below:

These paragraphs explain why an Area Action Plan would not be considered an appropriate policy document format for this DPD. An Area Action Plan aims to focus on a specific location or an area subject to conservation or significant change (eg major regeneration), and to facilitate specific projects or proposals to enable that change.

Other initiatives are already underway to try and improve the situation in Cliftonville including the declaration of Cliftonville West as a Renewal Area (an initiative to work with landlords and residents to improve the physical state and appearance of buildings and bring empty properties back into use to try and tackle poor housing conditions coupled with social and environment needs), the Safer Stronger Communities Fund (aiming to making the area safer, cleaner and greener and building a greater sense of community pride) and the adoption of a planning policy restricting the development of one-bedroom flats in this area.

The declaration of the Renewal Area and the one-bedroom flat policy underwent significant public consultation which identified other issues (including parking problems, high number of rented properties, bad tenants, need for greater police presence, bin storage and noise, rubbish, alcohol and drug taking) causing concern to residents, businesses and associations in the area. Following these consultations, a request was made by Council Members for prompt action to be taken to address some of these other issues. We also continued to receive comments and concerns from residents in the area. It was therefore considered necessary for a DPD to be produced for the Cliftonville West area to formalise the one-bedroom flat policy and to introduce new planning policies that could begin to be implemented immediately after their formal adoption by the Council.

The large number of suitable properties and the relatively low property prices in the Cliftonville West area have given rise to the situation where a very high number of properties have been converted into poor quality small flats, often without private gardens/amenity space or sufficient parking, properties being occupied by transient, often vulnerable people, often placed there by other authorities, and little greenery or landscaping. These trends need to be reversed urgently. The Councils vision is for a more balanced community with a better mix of housing, encouraging families and

property owners to live in the area, and taking measures to ensure that any new developments or conversions are of a high quality design and addressing the issue of parking where possible.

These issues of quality accommodation and useable amenity space etc need to be addressed as soon as possible. In the immediate future there are no specific proposals or projects for the Cliftonville West area that could be facilitated by an Area Action Plan. The issues that need to be addressed are directly related to the significant number of planning applications being submitted in this area. In order to achieve the Councils planning objectives for the area as soon as possible, it is necessary to implement a series of Development Control policies, therefore the DPD approach was considered the most appropriate for this document.

The Cliftonville West Renewal area has recently been extended and now incorporates other parts of Margate. If definitive proposals for the extended Renewal Area are established, it may then be considered appropriate to develop an Area Action Plan to cover the whole of the extended area.

The Preferred Options – Outcomes

The following sets out each of the Preferred Options included in the Preferred Options consultation and a commentary as to their inclusion, or not, in the Publication Document.

Option 1.1 – Develop and over-arching policy across a wide spectrum of issues with the aim of addressing the identified ‘key’ problems in Cliftonville West

This policy was drafted, but considered to be more a set of aims rather than policy criteria. It was therefore decided that the issues should remain as aims setting out what the DPD would like to achieve, rather than a planning policy.

Option 2.1 – (One-bed flat policy) – The policy adopted in 2006 should continue to be implemented

The policy has been operational and successful, is understood by developers and has been considered by planning inspectors at appeal. The wording has been changed to reflect its status as a planning policy, rather than an adopted council policy, but otherwise remains unchanged as a policy in the DPD.

Option 3.1 – (Retention of Family Housing) – To develop a policy to retain existing family housing in the area

This Preferred Option was carried forward to the Publication DPD. In addition, a policy has been introduced requiring the provision of family housing in new developments.

Option 4.1 (size of flats) – Continue using existing standards of 50m sq until resources are available to carry out a full and robust review of the guidelines

The issue of the size of flats has been highlighted as a major area of concern by residents, both in previous public consultations, and in informal meetings with officers, regarding the Publication Document. Residents are concerned that space is an important consideration and goes to the root of the problem in Cliftonville, and that this needs to be addressed as a matter of urgency.

In the absence of national guidance or policy on minimum space standards for housing, some local authorities have set their own. The Council has its own standards covering the whole district, in the Conversion to Flats Guidelines which were adopted in 1988, but are now considered dated and in need of revision.

There are no national internal space standards for the private sector, and successive governments have been reluctant to intervene in the market. Recent research has been carried out on behalf of the Greater London Authority (GLA), and by Mid-Sussex District Council, exploring the possibility of introducing minimum space standards. Their findings highlighted that the introduction of new space standards can be a contentious issue, as developers argue that the market should decide what is an adequate size for a dwelling as a property that is too small would not sell. It is also argued that the demand for new homes (particularly in the South East) means that residential units need to be smaller in order to be accommodated within existing land assets. Indeed government policy supports the creation of smaller homes to meet growing demand from smaller households being created and to ensure that maximum use is made of brownfield land in urban areas. However in today's economic climate people are divided between those who can afford to buy their own homes, and those who cannot, and some have no option than to buy or rent small, cheap properties.

Officers have given careful consideration to the issue of room space standards in this DPD, and concluded that it would be inappropriate to set a new standard for Cliftonville in this DPD for the following reasons:

- A new minimum room space standard would need to go through the Examination process if included as planning policy – this would require a robust evidence base to demonstrate that this is a significant problem. Substantial further research is still required.
- Would need to demonstrate how a new standard has been determined and why that figure has been set
- May be too restrictive and inflexible as a planning policy - an increased minimum standard may still result in insufficient space if designed inefficiently, or due to the amount of space that is actually usable. Could also end up penalising good design for smaller flats that are designed well and give the impression of being spacious. Other local authorities who have set space standards have done so as Supplementary Planning Document/Guidance rather than planning policy.
- If at Examination the Inspector considered the requirement unreasonable, the policy may be found unsound with instruction for its removal, and cause the whole DPD to be found unsound
- Would add substantial delay to production of DPD due to the research and additional consultation that would be required, and could conflict with timetable and resources for Core Strategy which is a corporate priority

Conservation Areas and Room Space Standards

Conservation-led change has a vital role to play in the social and economic regeneration of our towns and cities: historic areas can provide a focus around which communities can regenerate.

Discussions are currently in progress with English Heritage and residents regarding the potential designation of some parts of Cliftonville as a Conservation Area. The first part of this process will include a character appraisal of the area, and the development of management proposals for proposed conservation areas. The management proposals should take the form of a mid- to long-term strategy, setting objectives for addressing the issues and recommendations for action arising from the appraisal and identifying any further or more detailed work needed for their implementation. There is scope here, therefore, for the issue of internal space standards to be

addressed in association with conservation area designation, the advantage being that whilst there will be public consultation to determine a reasonable and realistic requirement, the inclusion of internal space standards will not be restricted by the planning policy process. Discussions are well advanced with English Heritage together with the Renewal Board to the effect that they will fund a full appraisal of the Cliftonville area to determine whether or not a conservation area could be designated.

Options 5.1 and 5.2 (Design, Open Space and New Development)

Option 5.1 – Develop a policy limiting residential extension unless there would be no material loss of garden or open space from the existing property, and that a suitable level of accessible amenity space can be provided for the units

After further consideration of this policy option, it was decided that the issues of provision of gardens and amenity spaces are already covered in existing saved local plan policies and the Conversion to Flats Guidelines, therefore to include the issue in this DPD would be duplication. The issues would however be addressed in the proposed review of the guidelines.

Option 5.2 – Develop a policy stating an indicative maximum density of new dwellings for the area

This option was considered not to be practical for the Cliftonville Area as the area is already densely populated, and would make relative densities between new build and conversions unrealistic and any relating policy difficult to implement. . However the policy requiring all new build to be family homes indirectly addresses the density issue.

Options 6.1 and 6.3 (Tourism)

Option 6.1 – To safeguard buildings currently used/potentially suited to use as quality hotel accommodation that will enhance and support the local tourism economy

This option has been the subject of much discussion and careful consideration. Whilst it may be appropriate to safeguard hotels as once a hotel has been converted to other uses, it will never be a hotel again, it is unreasonable to 'force' hoteliers to either keep hotels and a struggling business, or sell as a business that nobody would want to buy.

Further consideration suggested it may be unfeasible to apply a hotel retention policy just to Cliftonville. However, its inclusion in the Core Strategy as a district-wide option may be more appropriate.

The following arguments were presented at a meeting of the Local Development Framework Steering Group:

For

- If we can produce evidence that a criteria based policy is applicable district wide, then incorporating it into the DPD would introduce it sooner (albeit for only Cliftonville)
- Will help reduce potential for additional flats as hotel buildings typically lend themselves to such

Against

- Unless we have a really robust evidence base/data, policy could backfire resulting in dereliction, or the importation of more vulnerable people to occupy under-used

hotel/guest-house rooms that might otherwise be converted/developed into good quality accommodation or alternative use.

- The Cliftonville DPD could be found unsound without a credible evidence base and the whole document could potentially fail.
- If we develop a hotel retention policy for Thanet, the Cliftonville policy will need to be consistent with it (could have a compliance issue as the Core Strategy policy should be developed first and the Cliftonville policy should comply with it – not the other way round!)
- Policy option has not had significant support – two comments were received suggesting it should be part of a district wide policy
- District wide policy would more likely be defensible (criticism of pre introduction in Cliftonville DPD might be to question its validity without comprehensive review of demand and total stock in the wider area)

Councillors debated these points in some detail at the meeting, but requested that the policy be included in the Cliftonville DPD unless further evidence suggested otherwise.

A meeting was held with representatives from some of the Cliftonville Residents Associations and they were asked for their views on the inclusion of a policy to retain hotels. Whilst they appreciated the aim resist their conversion to more flats, they considered the remaining hotels to be of poor quality an unlikely to be worth retaining. Meetings have also been held with a number of hoteliers in Cliftonville.

It was therefore concluded that there was not sufficient evidence to support a policy retaining hotels in the Cliftonville DPD, and to do so would not be justified.

Option 6.3 – a criteria based policy to support proposals to upgrade existing tourist accommodation, or for the provision of new tourist accommodation.

This policy option was carried forward into the Publication Document. Whilst policy T1 of the adopted local plan supports new tourist accommodation in general, it was considered necessary to expand on this policy to apply to Cliftonville as it has become largely residential but with the potential for a growth in tourism as various regeneration projects evolve.

Options 7.1, 7.2 and 7.3 (Traffic Management)

Option 7.1 – Policy requiring the provision of cycle storage within all new developments

This option had been included as a policy in the Publication Document until a meeting with Kent Highways and Development Control was held on 19th January 2009 where the issue was discussed at length. The current Kent Vehicle Parking Standards currently require the provision of one cycle parking storage facility per bedspace or residential unit. To include a policy in the Cliftonville DPD would duplicate this requirement so was therefore considered unnecessary.

Option 7.2 – Policy requiring the provision of additional car parking spaces per additional residential unit created by extensions to properties.

It had been considered that the Cliftonville Publication Document should expand upon this preferred option and include a general policy to request the provision of adequate off street parking in an acceptable manner, or to require the developer to provide evidence that there is adequate on-street parking available and that the proposed development would not result in conditions detrimental to highway or pedestrian safety.

A parking survey was carried out following comments from and discussions with residents within Cliftonville who had expressed concern that some roads in the area were becoming congested and that it was difficult for residents to find parking spaces in convenient locations.

The aim of the survey was to provide evidence to support the development of the Cliftonville Development Plan Document and also to potentially provide evidence for the council in determining planning applications in the area. The survey provided a “snapshot of the parking situation in the Cliftonville West Ward.

The survey found that the availability of parking spaces varies significantly between different roads within the study area. The amount of parking available in the area as a whole is sufficient to meet the needs of residents, shoppers and visitors. However, this picture does not tell the full story as many of the available parking spaces are along the northern edge of the study area in Eastern Esplanade and also at the northern end of many streets.

Given that some roads are very heavily parked in certain sections, the ability of residents to park outside or even close to their own properties can be problematic in many parts of the area. The major issue therefore becomes one of access, convenience and perceived safety rather than an ability to park in the area as a whole.

While this situation is not ideal, it is one that exists in many other parts of the district where off street parking is limited and/or where large properties have been converted to smaller units.

Extensive discussions took place with Kent Highways Services and Development Control exploring the possibilities of a number of policy options. Kent Highways Services advised that there is no current problem with highways safety, therefore the problem is an amenity issue with residents often unable to park near their homes. It was concluded that a policy to reduce the amount of on-street parking would be based on anticipated parking problems, dependent on levels of development and car ownership, and would not therefore be sound.

The current method for calculating car parking makes an allowance for the existing use of a property. Therefore if an existing hotel with ten bedrooms were proposed for conversion to five 2-bed flats there would be no requirement for any on site parking. Kent Highways have agreed that this is inappropriate in Cliftonville. Policy CV5 has therefore been agreed to address this issue.

How issues from the consultation have been addressed in the Publication Document

The following points have been included in the Publication document as a direct result of comments made during the preferred options consultation:

- Include ‘to encourage biodiversity’ in the Vision
- Include ‘Northdown Road will be a bustling, diverse area with a thriving high street attracting independent retailers. Local people and tourists will enjoy their shopping experience in Northdown Road. New enterprises will support existing businesses and leisure facilities along the sea front, reflecting and enhancing the natural beauty of the coastline’ to the Vision
- Include text in the Publication Document relating to the size of flats and emphasising the importance of spacious living accommodation
- Include provision of green spaces in Vision and key issues for Cliftonville
- Include text referring to other regeneration initiatives in Margate and extensions to the renewal area.

- Include text setting out expected timescale of the DPD
- Expand on conformity/links with other plans and strategies and chain of conformity
- Include section on implementation and monitoring
- Include map of the district indicating the Renewal Area
- Include a statement to the effect that the DPD does not replace any policies from the adopted Local Plan, but has evolved from policy H10
- Clarify one bedroom flat policy (ie status)
- Include a summary of the main findings of the Sustainability Appraisal

Additional Consultation - Meetings with Cliftonville Residents

Two officers from Strategic Planning and two officers from Development Control met with Cliftonville residents on 8th September 2008. Residents were present representing the Surrey Road Action Group, Gordon Road Residents Association, Dane Road Residents Association, Dalby Square Residents Association and Grotto Hill Residents Association. The meeting was held in Cliftonville and representatives had been asked to take officers on a 'tour' of the area to highlight where some of the main problems and biggest issues were.

The route taken was as follows:

Gordon Road – Cracked roads/pavements, rubbish

Dalby Square – Cracked roads/pavements, washing hung out across balconies, one side of road inhabited totally by Czechs apart from a guesthouse, big turnaround of residents, garden area is well used

St Pauls Church – people drinking alcohol in space outside church as we walked past

Clifton Road/Grotto Hill – Cracked roads/pavements, anti-social behaviour often occurs in Clifton Place, need more rubbish/dog bins, nuisance residents, Caroline Square – overgrown, not maintained

Booth Place – rubbish & litter

Godwin Road – recently formed new residents association, wrought iron posts rotting

Northdown Road – Graffiti, shop workers park in side roads

One of the recurring issues during the site visit was the poor state of roads and pavements. Officers subsequently met with a Highways Inspector and conducted a similar tour of Cliftonville to highlight the problem areas.

Meetings with representatives from Residents Associations

Officers have been continuing to meet with representatives from the Residents Associations:

15th December 2008 Meeting with 4 residents and staff from Housing, Renewal Area Team, Development Control, Strategic Planning – discussions about the scope of the DPD and other council initiatives for the area

10th February 2009 Meeting with 2 residents, Strategic Planning Staff, Consultation Officer and Ward Member. Discussions about the draft Publication Document, the next stages in the DPD

process, how to involve residents. Residents reported that the most significant issue was size of flats. Residents would take the draft document to their groups and meet with Officer again to give comments.

5th March 2009 Meeting with representatives from the Cliftonville Futures Group, Officers from Strategic Planning, Renewal Area Team, Development Control to discuss the groups views on the draft publication document.

3rd April 2009 Meeting with 6 representatives from the Cliftonville Futures Group and the Leader of the Council to discuss some of the other issues that are not planning issues, and what has/is being done about them.

5th May 2009 Meeting with representatives from the Cliftonville Futures Group, the Leader of the Council, and officers from other council departments for further discussion about other Council initiatives in the Cliftonville area.

9th June 2009 Meeting with Cliftonville Futures Group and officers to discuss Northdown Road and its function in the retail hierarchy as part of Core Strategy preparation. Also to explain the representations procedure to the Cliftonville Groups.

Meetings held internally

There have been a number of meetings with officers from other departments to ensure the DPD supports other council initiatives;

15th July & 19th December 2008 – Meeting with officers from Development Control to discuss the Preferred Options and if/how to progress them following comments from consultation

5th August & 6th October 2008 Meeting with Tourism to discuss policy for the retention of hotels

12th January 2009 – Meeting with officers from Housing, Renewal Team, Margate Renewal Partnership, Conservation, Kent Highways, Development Control, to discuss the draft Publication document. Most significant issue raised was the reference to a potential Conservation Area which has since been included.

19th January 2009 – Meeting with Kent Highways, Development Control to discuss cycling and car parking policies

Consultee Lists

The same databases were used for the consultations under Regulations 25 and 26.

A database was created identifying local community groups and businesses in the Cliftonville West area, and individuals who had been involved in earlier consultations for the declaration of Cliftonville West as a Renewal Area, and also the one-bedroom flat policy.

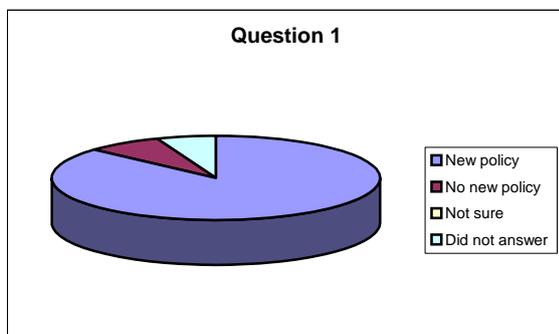
These databases are listed in Appendix ? and are the contacts used for the consultation under Regulation 26.

Appendix 1 – Summary of Regulation 25 Consultation – Issues and Options

SUMMARY OF RESULTS (based on 53 returned surveys and two public forums)

Q1. Which of the following statements do you agree with?

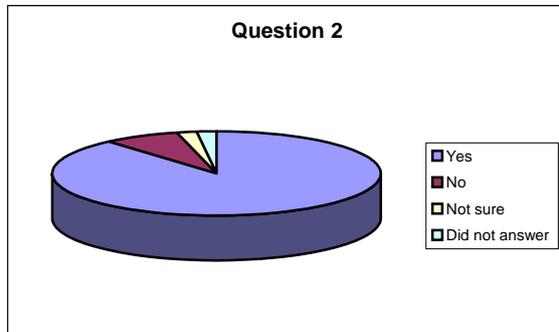
- There should be a new planning policy with tighter planning controls in Cliftonville West to help deal with the problems identified in previous consultation (Size of flats, extensions to hotels, parking and design principles).
- Cliftonville West should be left to develop according to market forces with no new planning policy.



(86.8%) of respondents considered there should be a new planning policy. Only four respondents (7.5%) felt otherwise. General comments included:

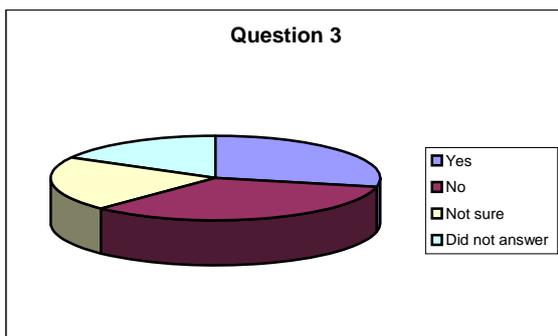
- Fitted gates needed on rear access alleys to hopefully avoid littering.
- The policy should apply more widely in Thanet, e.g. Minnis Bay.
- The policy should also include enforcement to omit the current trend of second hand goods shops opening in Northdown Road and displaying goods on the pavement
- Derelict and empty flats should be dealt with before any new flats are built
- Complementary policies on health, crime, education etc are needed.
- The Council should use its planning powers to resist the trend of subdividing former guesthouses into small housing units that currently dominate Cliftonville's housing market, and which have a detrimental effect on both the built environment and social structure.
- Planning policies should reflect the outcomes of consultation exercises.
- The Council should closely monitor instances where owners are dividing one-bedroom properties into two bedroom properties to align with the existing policy.

Q2. Do you support the policy adopted following the previous consultation restricting the further development of one-bedroom flats in Cliftonville West?



88.7% of respondents supported this policy.

Q3. Do you think any amendments are needed to the policy?



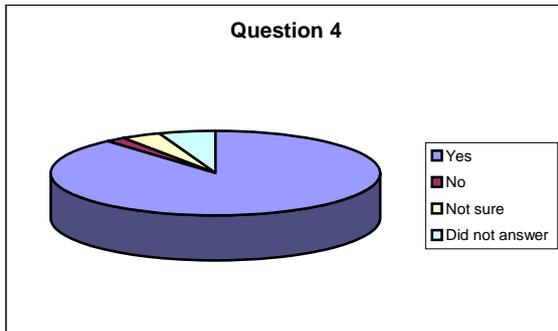
34% of respondents considered the current policy appropriate, whilst 28.3% felt amendments were needed. A varying range of additional comments were made, including the following:

- Further restrictions in the number of occupants on state benefits.
- The one-bedroom policy should be reviewed in 5-7 years and/or monitored regularly and amended where applicable.
- Flats should be specifically allocated to the 60+ age group.
- Landlords should be made more responsible for their properties.
- Three bedroom flats are essential if the area is to attract families.
- A multi-agency approach needs to be adopted to address long-standing problems.

Q4. Do you think an additional policy should be written restricting the conversion or development of houses/bungalows to provide flats if this meant:

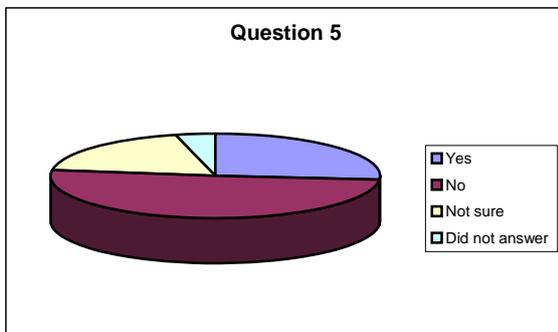
a loss of house/bungalow suitable for family occupation,

**too many flats in an area,
too much noise and disturbance to nearby neighbours, and
a negative impact on parking/unacceptable increase in traffic?**



Most comments made seemed to essentially echo the question, but specific reference was made to the need to prevent extensions (including those resulting in taller buildings), how exactly “too much noise” and “too many flats” etc were to be defined, and that “noise and disturbance” should come under an “anti-social” umbrella that includes crime etc.

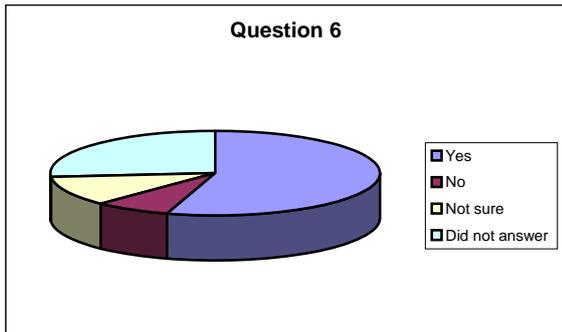
Q5. Do you think that 50m² is an appropriate minimum standard for two bedroom flats in Cliftonville West?



Just over half of all respondents agreed that 50m² was too small a minimum standard. Some respondents commented that it was difficult to equate a written figure to its actual physical dimensions.

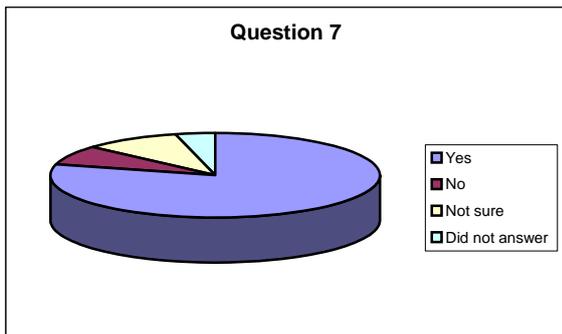
Q6. If not do you think that an alternative minimum standard should be set?

Again, just over half of total respondents (54.7%) agreed that an alternative minimum standard should be set. Where figures for alternative minimum standards were suggested, the most popular sizes were 75-80m². Other suggestions included 57m², 60m², and 65m², while two respondents suggested the minimum should be doubled. Two respondents stressed the importance of a garden, while the overriding theme of these comments was that space is essential if families are to invest and settle in the area.



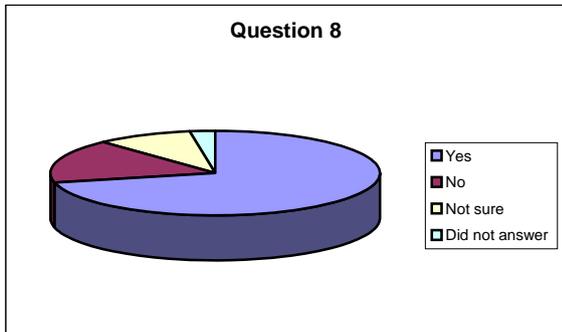
Q7. Should the Council consider a policy restricting extensions to buildings where this could result in additional dwelling units being provided?

79.2% agreed that the Council should consider a policy along these parameters. Nearly all the additional comments emphasized the need for space, though a couple of people suggested that extensions used for a commercial use (to attract employment) and larger family-based dwelling units (e.g. good sized maisonettes) are possible exceptions. The need for parking space was also emphasized in a couple of instances.

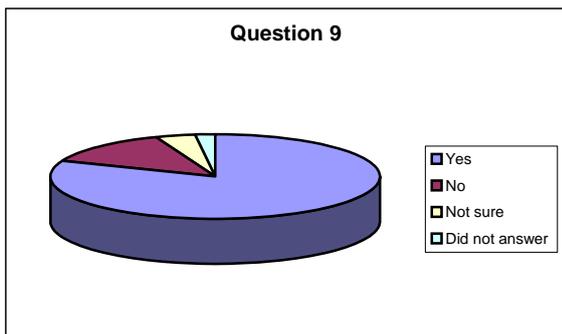


Q8. Should a policy be written requiring the provision of secure cycle storage/parking facilities at or near residential developments?

71.7% answered 'yes' to this question, which, along with Q9 and Q10, highlights that parking facilities are a key issue to be addressed.

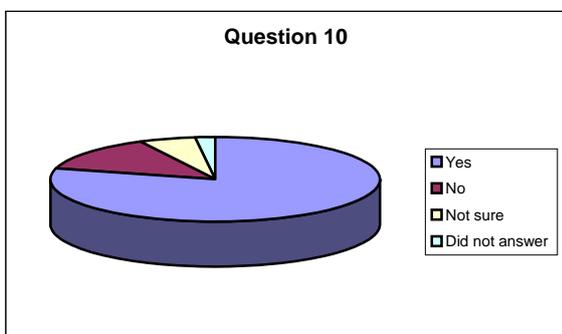


Q9. Should the Council insist on a parking space being provided for each new residential unit?



81.1% agreed, emphasizing the problems relating to parking

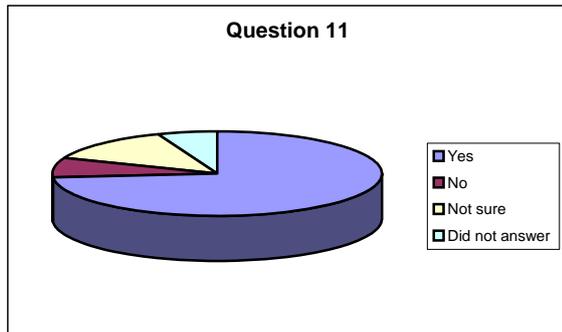
Q10. Should the Council refuse a residential development or conversion if appropriate car parking cannot be provided on the site?



Some comments were made that every family would have at least one car, and that improvements in public transport would not necessarily affect car ownership. Ideas for parking provision seemed to be split almost equally between residential permits/designated spaces, parking at the rear of properties, or restricting street parking to one side only. A couple of

respondents felt that a blanket policy in this instance would not be helpful, and that the pay-to-park scheme in Northdown Road could be abolished.

Q11. Should the Council adopt a new policy relating to specific design issues applicable to Cliftonville West? If yes, what do you think are important design matters for Cliftonville?



73.6% were in agreement that the Council should adopt a new policy with regard to specific design issues, the nature of which are highlighted later on in this summary. The most pressing issue for respondents is that all new builds and conversions should be in keeping with their surroundings, e.g. all sash corded windows replaced with double glazing should be as similar to the old ones as possible; no garish colours in an Edwardian area. Other issues raised pertained to the need for refuse space, resurfaced alleyways, garden space, street lighting, larger pavements, green areas (e.g. the bottom of Sweyn Road), redesigning roads to discourage speeding.

Q12. Are there any other issues that may be able to be dealt with by planning policy that we have not included?

Additional issues included:

- The need for improved waste storage (possibly underground?).
- New builds and conversions to take into account their surroundings
- Tree planting
- A bus route along the seafront, i.e. the Lido, Eastern Esplanade
- Pedestrian crossings in Northdown Road.
- Open spaces/children's play areas should be made part of the planning application

Appendix 2 – Summary of Regulation 26 Consultation – Preferred Option Document

Vision

The Vision was generally supported.

One comment was made that whilst the aspirations are commendable, the policies would be too rigid and inflexible, and queried its production prior to the Strategic Housing Market Assessment and Core Strategy.

Objectives

General support given

Issue 1 – The over-riding need for action in Cliftonville West

General support given.

Issue 2 – The Adopted Cliftonville Policy

General support for the one-bed flat policy. A suggestion was made regarding the consideration of collecting Development Contributions in instances where the conversion of large properties into multiple units is permitted and results in a net increase in the number of units.

Issue 3 – Family Housing

This issue was well supported and a suggestion was made that new developments should be for, or to include, family housing. Comments were made that a policy retaining family housing should be adopted immediately to stop the conversion of properties that are suitable for family housing. One objector considered that family housing should be safeguarded but to continue to allow the conversion of larger buildings to apartments

Issue 4 – Size of Flats

Several comments were made regarding this Issue that 50 m square is not a big enough floor area for a two-bedroom flat, and that a new standard should be implemented until the Conversion to Flats guidelines can be reviewed, or that all conversions be halted and the Guidelines be reviewed as a matter of urgency. One comment was made that the Guidelines should remain as they are, as government guidance encourages high density development and efficient use of floor space.

Issue 5 – Design, Open Space and New Development

Support was given for the protection of existing garden or open space from development, with suggestions to clarify this with text regarding the benefits of planned and designed high quality green spaces can bring to residents. Support was also given to applying a maximum density to new dwellings. One comment was made that these measures would be excessive and inflexible and that there are policies in the adopted Local Plan to cover these issues.

Issue 6 – Tourism

There was general support for proposals to upgrade existing tourist accommodation or proposals for new tourist accommodation. However, there was concern that safeguarding existing hotels could result in hotel buildings being unlawfully used as HMOs, or becoming derelict, or poor quality hotels in inappropriate locations. Comments were made that this subject needs further research to provide an evidence base for this issue.

Issue 7 – Traffic Management

The Option to require the provision of secure cycle storage within all new development was generally supported. However, comments varied regarding requesting parking spaces per each additional residential unit provided by an extension to a property, and also the suggestion of reducing parking on front garden areas, particularly since this is permitted development and would not normally need planning permission. It was suggested that research was needed to determine the level of car ownership, availability of parking spaces and non-registered/taxed cars to provide an evidence base for this issue.

Issue 8 – Refuse Storage

This option was generally supported – most of the comments made related to refuse collection and will be passed to the Waste and Recycling section.

General Comments

Comments were made that the document should either be an Area Action Plan or Supplementary Planning Document as the DPD lacks specific spatially based proposals for change.

Lack of detail regarding implementation and monitoring, and lack of reference to specific proposals and when they will happen

Vision should be locally distinctive and spatial

People were unaware of the document and those who were had difficulty obtaining a copy