

July 2022



Westgate-on-Sea Town Council Neighbourhood Plan Reg 15 Consultation Statement

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Key Themes

Key theme 1: “sustainability, green spaces, wildlife”

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- Thanet District Council
- Coal Authority
- Millwood Designer Homes Ltd

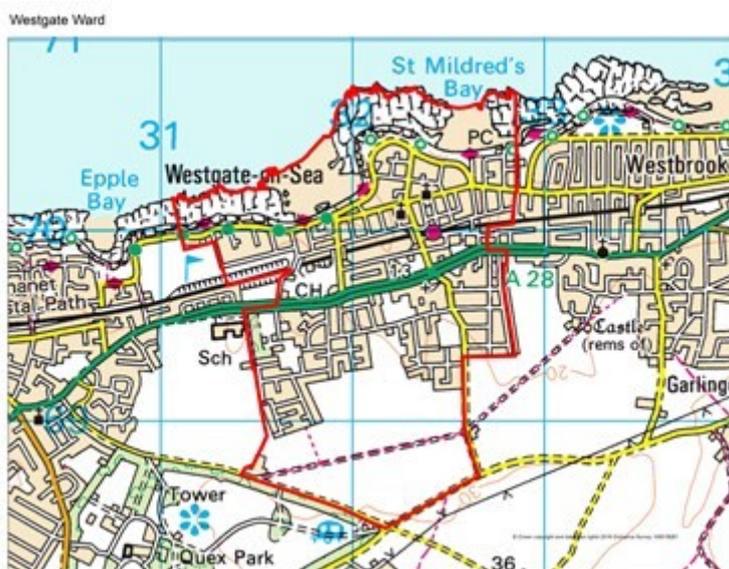
Introduction

This statement has been prepared by Westgate-on-Sea Town Council (the Town Council) to accompany its submission of the Westgate-on-Sea Neighbourhood Development Plan (the NDP) to the local planning authority, Thanet District Council (the District Council), under Regulation 15 of the Neighbourhood Development Planning (General) Regulations 2012.

The NDP has been prepared by a Neighbourhood Plan Steering Group (NPSG) and a sub-committee of the Westgate-on-Sea Town Council formed of Town Councillors and community members. A number of Garlinge residents have also been members of the group, as the housing allocation in the Thanet District Council Local Plan called “Westgate” spans both Westgate and Garlinge and greatly affects both areas. The NDP has been prepared through consultation with residents through feedback at the launch meeting and the big community survey prior to the Regulation 14 consultation undertaken as well.

Designation of the Neighbourhood Area

The Westgate-on-Sea Neighbourhood Development Plan relates to the designated area covered by the Westgate-on-Sea Parish. The Neighbourhood Area designation was approved by Thanet District Council on 20th October 2016. The area which the Plan applies is set out in the map below:



PGSA licence No: 100058504

Pre-Submission Regulation 14 Consultation Process

Consultation was carried out by Westgate-on-Sea Town Council in partnership with its consultants, Breakthrough Communications & Strategies Limited. Consultation events took place throughout the neighbourhood planning process. Breakthrough Communications & Strategies Limited were commissioned by the council to work with its officers and councillors, as well as with the council's planning partner, Goldstone

Town Planning, to develop a set of questions to be developed into the Neighbourhood Plan consultation survey, as well as to support and facilitate one virtual engagement event and one hybrid event that was in-person and live-streamed.

This was in addition to extensive social media promotion and engagement work, with the overall objective of encouraging residents and others to take part in the consultation survey. The consultation was undertaken between 24th September 2021 and 25th November 2021.

In-person consultation events were carried out as follows:

- 26th and 29th September 2021 – in-person events
- 30th October 2021 - a hybrid in-person and live-streamed event

Virtual consultation events were carried out as follows:

Two virtual events were held, one of which was virtual, the other a virtual and in-person hybrid event, with the objective of building awareness of the consultation process and encouraging residents to ask questions and then take part in the Regulation 14 Survey.

- A virtual consultation event took place on 24th September 2021, between 6.30pm and 8.00pm. This was carried out using the Zoom platform, and was live streamed to the council's Facebook page, a copy of the recording of which was then saved on Facebook, to enable residents to watch back the recording. To date, the recording has been viewed 110 separate times;
- A hybrid consultation event, which was in-person but live-streamed, took place on 30th October 2021 from 10.30am and 12.30pm. This was held at Town Council office, 78 St Mildreds Road, Westgate-on-Sea, CT8 8RF and promoted heavily through the council's various communications channels.
- To date, the recording of part of the event has been viewed 421 times.

Regulation 14 Consultation Leaflet Delivery

In order to maximise community awareness of the Regulation 14 consultation, an A4 double-sided leaflet was produced and delivered to most houses within the parish. This explained the current stage of the neighbourhood planning process, what the Regulation 14 consultation was for and invited people to take the survey, either by scanning a 'QR' code or by visiting the council's website, or alternatively to telephone the council if a printed copy was required.

A copy of the leaflet is included in Appendix 3b.

Statutory Consultees and Local Businesses/Organisations for the Regulation 14 Consultation Process

There were numerous local businesses, community groups, local organisations and neighbouring local Councils as well as statutory consultees engaged in the Westgate Neighbourhood Plan Regulation 14 consultation process.

A copy of the list of organisations and consultees can be found in Appendix 3a; the list details the name, method of delivery and the date the consultation details were shared with each organisation or consultee.

Regulation 14 Consultation Survey Introduction

Between 24th September 2021 and 25th November 2021, a Regulation 14 Survey was carried out as part of the Westgate-on-Sea Town Council's Neighbourhood Plan consultation process. There were a total of 326 responses, of which 312 were digital responses and 14 were from printed copies of the survey. Appendix 1 summarises the responses and key themes emerging from the responses provided.

Regulation 14 Consultation Survey Creation

Breakthrough Communications & Strategies Limited worked extensively with council officers and councillors, as well with the council's planning partner, Goldstone Town Planning, to develop the survey and designed and implemented a plan to ensure the Regulation 14 consultation had widespread awareness.

A copy of the survey is attached at Appendix 2.

Regulation 14 Consultation Survey Distribution

Due to logistical and practical challenges presented by COVID-19 restrictions during the period in which the Community Survey was carried out, the council's main focus was to encourage response to the digital version of the survey. The digital version of the survey was heavily promoted on the Town Council's social media and on its website throughout the consultation period.

In addition, Breakthrough Communications & Strategies Limited made use of extensive paid-for social media advertising across Facebook and Instagram platforms to geo-target residents who self-identify as living within the geographic boundary areas of the council, inviting them to complete the survey.

A small number of printed copies were also made available, and these have also been fed into the report. Hardcopies were available to collect at the offices of Westgate-on-Sea Town Council and were sent out in the post or otherwise given out on request.



Initial Consultation Outcome

The attached Regulation 14 Survey Report (Appendix 1) summaries the responses provided to the Survey.

Appendix 1 - Summary of Responses and Key Themes

Summary

Positive issues identified within the survey:

- Each of the proposed Neighbourhood Plan themes were supported by a majority of responders, as follows:

Theme	Supported	Objected	Wished to add something
Theme 1 - Design	284	16	15
Theme 2 - Our Local Economy	279	14	27
Theme 3 - Our Local Heritage	292	11	17
Theme 4 - Sustainability	275	10	33
Theme 5 - Green and open spaces	288	9	23
Theme 6 - Biodiversity	288	5	26
Theme 7 - Local Facilities and Infrastructure	284	7	22
Theme 8 - new housing developments	226	48	41

- There was broad positive satisfaction with green spaces, where the majority of respondents who mentioned them in open answers expressed a desire to protect these areas.
- Sustainability was strongly endorsed with a majority of some 84.1% of respondents in favour of working towards greener housing.
- Over a third of resident respondents are content with the character of the town, feeling the need to preserve it for future generations.

Negative issues identified within the survey:

- The supporting infrastructure and services in the area are not capable of supporting new housing and development. GP surgeries and dental practices are overwhelmed by the number of patient applications. ([7a](#), [7b](#))
- A number of responders commented on their concern about 'Air BnBs'. Some respondents even suggested officially regulating the uses of new housing to prevent new Air BnBs from being create ([7b](#))
- Cleanliness, including the maintenance of green spaces, is considered to be a significant issue. ([2b](#), [6b](#))

Strongly expressed views within the survey:

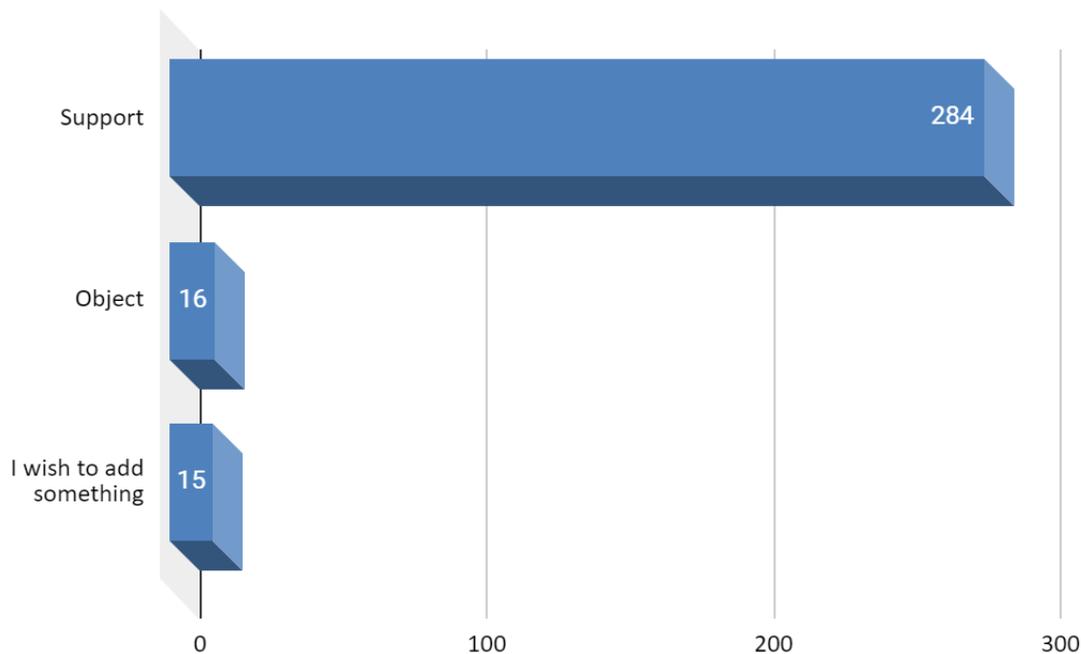
- The need to maintain and expand green spaces ([1b](#), [2b](#), [3b](#), [4b](#), [5b](#), [6b](#), [8b](#))
- A desire to see more social and family-friendly spaces, such as parks and children's play areas ([4b](#), [5b](#), [7b](#))
- To create more GPs and dental practises accommodating new housing developments ([4b](#), [7b](#), [8b](#))
- A need to protect and encourage local wildlife ([1b](#), [3b](#), [4b](#), [5b](#))
- A desire to preserve the character of the town ([1b](#), [8b](#))
- To create more sustainable housing and ways to reduce carbon emissions in the area ([1b](#), [3b](#), [4b](#), [5b](#), [7b](#))
- The need to make public spaces more accessible ([7b](#))

Appendix 2 - Copy of the Regulation 14 Survey Res

Question 1a: Do you support or object to our proposals for 'Theme 1 - Design' or do you consider something needs changing?

(Question response options: 'Support', 'Object' or 'I wish to add something')

315 out of a total of 326 respondents (96.6%) answered this question.



Question 1b: Is there anything you wish to add or comment on, with regards to this theme?

(Question response options: open answer)

103 out of a total of 326 respondents (32.7%) answered this question. However, the majority of the respondents to this question were those 315 respondents who were seeking to elaborate on their answer to question 1a.

Of those, the key themes were:

Key Themes

Key theme 1: "maintaining character, uniqueness, personality"

34 of 103 (33%) respondents aligned to this theme:

- "Let's keep Westgate as a delightful seaside resort."

- “Do not change the character of the sea front.”
- “I agree that it is important to not only protect but also emphasise the unique character of the town.”
- “It is essential that Westgate’s character and quiriness is kept.”
- “We must maintain the character of our town but not allow an influx of unnecessary new housing. More focus should be on the reuse and redevelopment of what we have.”
- “Recognition needs to be given to innovative, quality design that may not necessarily be in character but would nonetheless enhance the area and build on the existing character.”
- “The character of Westgate needs to be protected, particularly in view of the extensive housing developments proposed for the immediate locality.”
- “It would be very good if new buildings retained some character of nearby buildings, especially on the seafront. The historic buildings must be retained and protected.”

Key theme 2: “green spaces, sustainability, infrastructure”

42 of 103 (40.8%) respondents aligned to this theme:

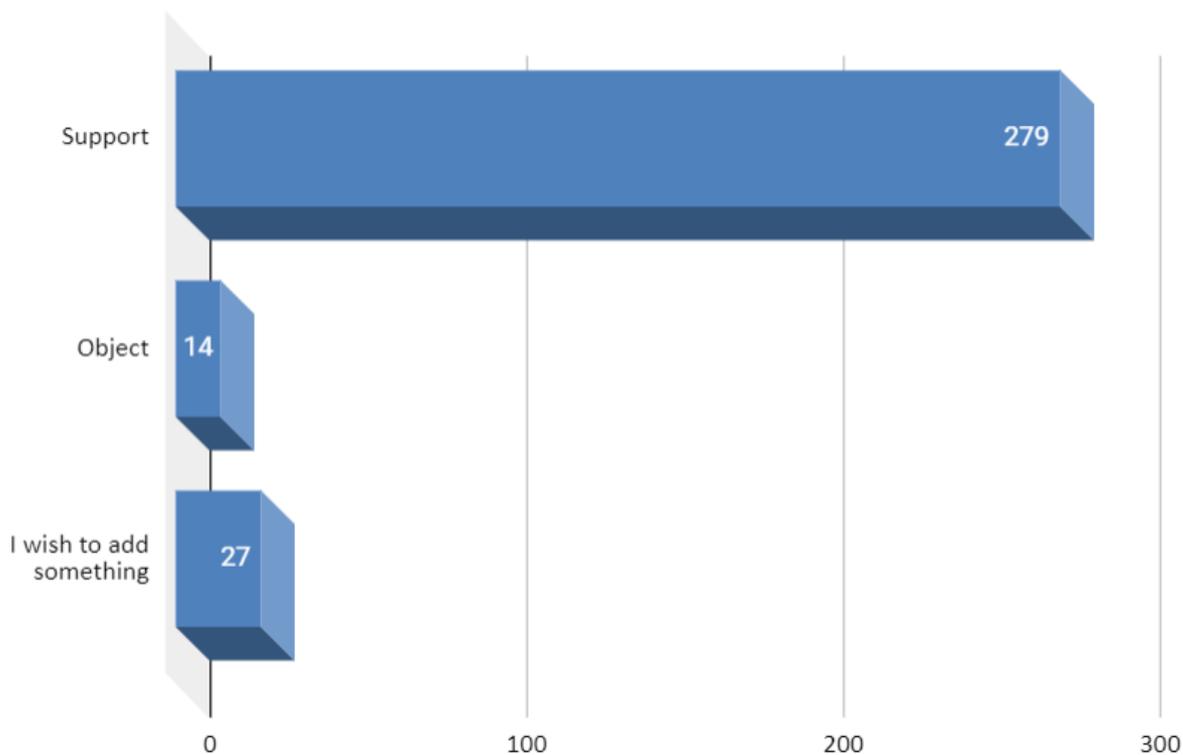
- “As long as new plans that are supporting green building, renovation are given high priority and approval- there needs to be a balance between maintaining a look and enabling green climate-based building work and renovations.”
- “Theme of sustainability, green infrastructure and energy efficiency should run through all new developments.”
- “New developments should not be on green land or farmland.”
- “Green spaces must be kept. Stop lorries parking on the sea front.”
- “I agree that all the green spaces mentioned need to be protected. But this should have been done sooner. I am personally upset about the green space outside St. Mildred’s Court, which was a thriving meadow until a few weeks ago. It made the space within the close feel warm and inviting to local residents and animals alike. Now the construction is pushing the wildlife out and blocking residents’ view of the sea.”

- “More recycling bins for residents and visitors. Kiosk which loans out beach toys, towels, picnic plates and cutlery for donations i.e.: buckets and spades, crabbing nets. To discourage visitors who bring their own and then leave them as litter on the beach.”
- “I think we need to ensure the town does not increase in size and new housing in limited to ensure our infrastructure can cope”
- “Along with new properties fitting in with the area infrastructure is just as important”

Question 2a: Do you support or object to our proposals for “*Theme 2 - Our Local Economy*” or do you consider something needs changing?

(Question response options: ‘Support’, ‘Object’ or ‘I wish to add something’)

320 out of a total of 326 respondents (98.2%) answered this question.



Question 2b: Is there anything you wish to add or comment on, with regards to this theme?

(Question response options: open answer)

123 out of a total of 326 respondents (38.4%) answered this question. However, the majority of the respondents to this question were those 320 respondents who were seeking to elaborate on their answer to question 2a.

Of those, the key themes were:

Key Themes

Key theme 1: “cleanliness, reduced pollution and green spaces”

36 of 123 (29%) respondents aligned to this theme:

- “The main shopping area definitely needs enhancing and kept clean”.
- “Yes would really like clean public toilets along sea front and in shopping centre.”
- “More emphasis on green infrastructure to reduce carbon emissions and temperature. Identifying the need for electric charge points to promote conversion to electric vehicles.”
- “I think the effort made last year to put tubs of flowers outside shops should be continued and be extended to other buildings without front gardens as well.”
- “Weeds are four feet high along West Bay seafront and are letting our 'shop window' down totally, creating a 'seedy' look to the environment. It is imperative that weeds are kept down by being treated with eco-friendly weed killer regularly and if they are, they will gradually die out.”

Key theme 2: “affordability and supporting local businesses”

51 of 123 (41%) respondents aligned to this theme:

- “Ensure that shop rents are affordable for businesses.”
- “Keep parking free in Westgate to support shops.”
- “As long as it is affordable for local people”
- “The Plan needs to be mindful of the potentially damaging effect of the burgeoning AirB&B market and its impact on the availability of affordable rental property for local people.”
- “Avoid AirB&B if possible as these are displacing local people from rented property and most cannot afford to buy.”
- “Air bnbs and holiday lets are strangling the local low-income earners from achieving affordable housing.”

Key theme 3: “health, safety and housing”

36 of 123 (29%) respondents aligned to this theme:

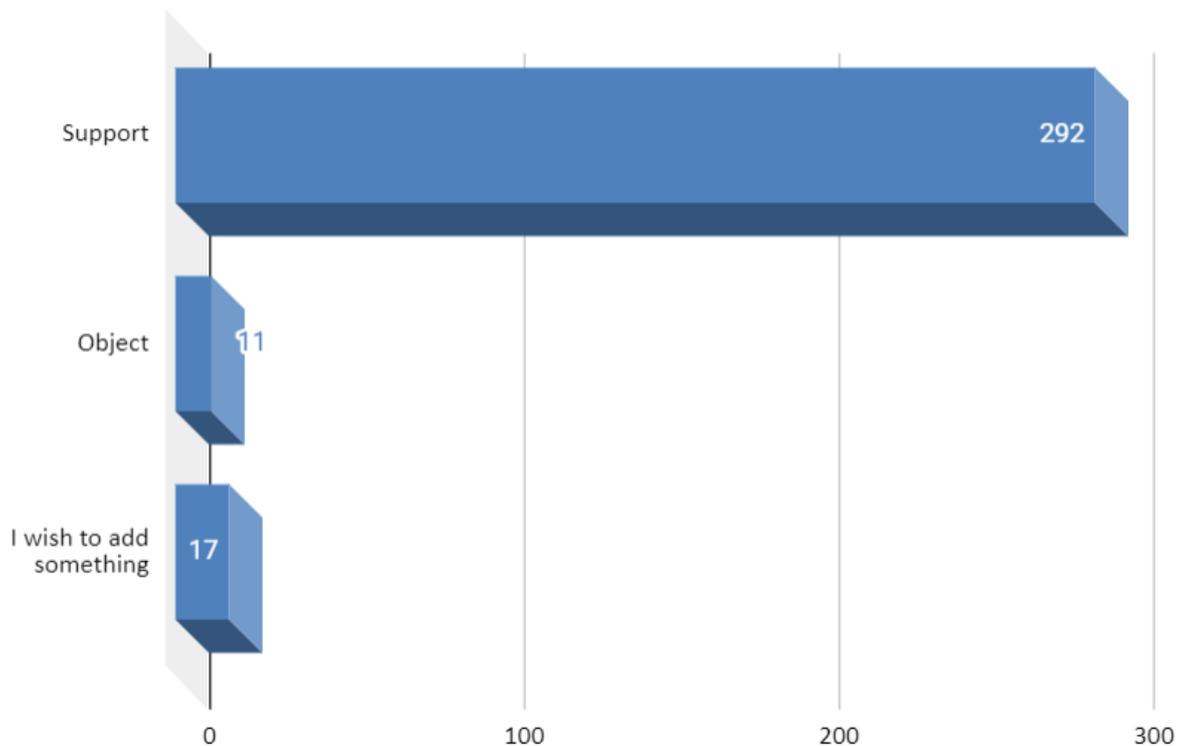
- “Housing is already tight due to airbnb which means the "plan" is for new housing. Let's sort out housing for locals first and foremost.”

- “Allow local businesses to flourish. Think about how shops selling food affect the diet and health of locals and effect on the NHS. Limit fast food options.”
- “If a property has been derelict for a set period (say 5 years) and all efforts to support its re-opening as retail have been exhausted then it should be considered for housing. Brownfield site is more environmentally friendly than greenfield site.”
- “We need to keep the area safe for tourists and residents.”
- “Housing is necessary and youngsters are the future. Business has to change.”

Question 3a: Do you support or object to our proposals for ‘Theme 3 - Our Local Heritage’ or do you consider something needs changing?

(Question response options: ‘Support’, ‘Object’ or ‘I wish to add something’)

320 out of a total of 326 respondents (98.2%) answered this question.



Question 3b: Is there anything you wish to add or comment on, with regards to this theme?

(Question response options: open answer)

82 out of a total of 326 respondents (25.6%) answered this question. However, the majority of the respondents to this question were those 320 respondents who were seeking to elaborate on their answer to question 3a.

Of those, the key themes were:

Key Themes

Key theme 1: “preservation, green spaces and restoration”

35 of 82 (42.9%) respondents aligned to this theme:

- “ I would prefer to conserve the farmland and green spaces we already have.”
- “I support this very much but would urge the focus to be cleaning, restoring the town as a whole to show the entire town at its best. Its charm is the uniqueness of the roads and buildings in general. Adrian square for example is such a fine example of this but is not looked after.”
- “The retention of front garden space planted up to support wildlife especially pollinators and making the developments more attractive. The developments planted up with appropriate native and fruit trees.”
- “Westgate-on-Sea architecture is so unique and so beautiful it has to be preserved from new buildings going up in not keeping with its unique architecture.”
- “Need to have the covered walkway in the station road repaired, it is literally falling down in places.”
- “Westgate Pavilion should be restored.”

Key theme 2: “new, sympathetic architecture, and adaptation”

24 of 82 (28.6%) respondents aligned to this theme:

- “We should also be creating a heritage for the future, not always looking back. Beautiful quality will always survive. Pastiche serves no one. So preserve the old and good, but add to it.”
- “Preserve yes but allow contemporary architecture too, we need to see novel buildings and methods to leave our mark on the history of the area for future generations too. Also newer methods help address issues of space and of eco living, as well as solving social issues and helping with inclusiveness.”
- “I don’t think architecture should be held in stasis, so whilst it needs to be sympathetic, we should allow interesting new architecture.”

- “Building should certainly be listed, but the use of that building should be flexible and not fixed. Areas change over time and our areas must be able to adapt.”

Key theme 3: “over development and funding”

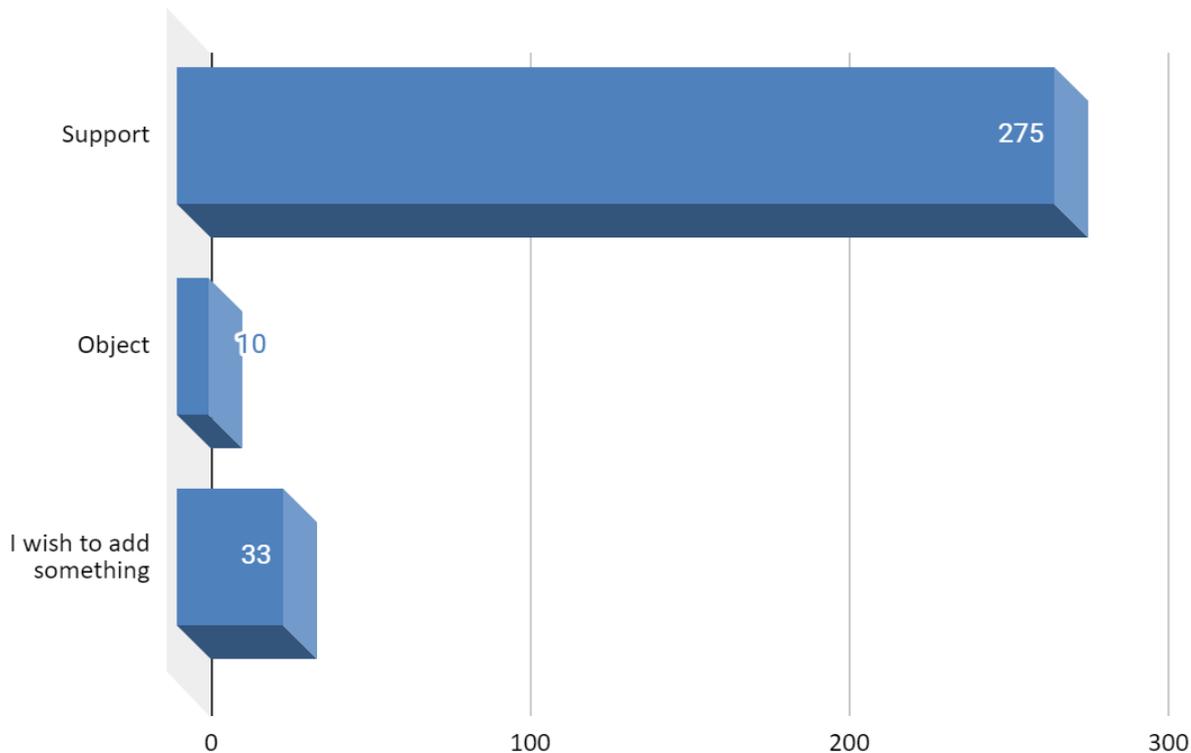
24 of 82 (28.6%) respondents aligned to this theme:

- “Again, overbuilding and overcrowding destroys any 'protection' you're planning.”
- “I fully support this. Our heritage must be protected. My question is where will the funding come from?”
- “Keep as much green space as possible and limit the size of developments.”
- “How much is the protection going to cost?”

Question 4a: Do you support or object to our proposals for ‘Theme 4 - Sustainability’ or do you consider something needs changing?

(Question response options: ‘Support’, ‘Object’ or ‘I wish to add something’)

318 out of a total of 326 respondents (97.5%) answered this question.



Question 4b: Is there anything you wish to add or comment on, with regards to this theme?

(Question response options: open answer)

112 out of a total of 326 respondents (35.2%) answered this question. However, the majority of the respondents to this question were those who were seeking to elaborate on their answer to question 4a.

Of those, the key themes were:

Key Themes

Key theme 1: “roads, services and other supporting infrastructure”

56 of 112 (50%) respondents aligned to this theme:

- “New housing should also have supported road structure.”
- “New developments need to not add further to the strain on infrastructure, particularly drainage, as it will create more instances of sewage being released into the sea which will damage the area and tourism.”
- “Southern Water needs to upgrade their infrastructure if we are to build more houses. Otherwise sewage release will continue to be a problem.”
- “Very concerned about the numbers of houses planned without supporting infrastructure, ie GP services, roads, impact on hospitals etc.”
- “New road infrastructure needs to be the “whole route “ and not be road which is widened just 50 metres in front of a new estate, where you end up back on a single lane road.. E.g. the link road through to Westwood Cross from Margate.”
- “Developer promises on water run off etc are useless without an infrastructure to support them.”
- “Westgate cannot physically support large scale development without first improving the infrastructure - roads, doctors, dental etc.”

Key theme 2: “greenery, biodiversity and sustainability”

64 of 112 (57.1%) respondents aligned to this theme:

- “Keep as much green space as possible and limit the size of developments.”
- “A lot more could be done here. Green spaces developed as habitat for wildlife, i.e. bird boxes.. Development of rock pools and protection of them.”
- “Houses cannot be built 8n our area without the increased facilitation of schools, doctors etc..the drains are archaic and not able to withstand today's demands and out green farmland is essential for Kent's farming.”
- “No housing developments to be built on green or agricultural land.”
- “I would like to see any new builds include ‘green’ initiatives like insulation solar panels and ground sourced heat pumps to ensure sustainability as well as your ideas on water conservation.”
- “No building on Green or arable land. Drainage system must not be overloaded.”
- “The sustainability could be more ambitious in its aim and vision, Westgate as an eco seaside town, ' simple' measures could include car sharing, reduce speed to no more than 20mph, including the main canterbury road, more street lighting but dimmed, create its own sustainable electricity, partnerships with other eco towns across Europe to learn, educational and public awareness measures around this objective etc.”
- “New builds within the parish are to contain forms of renewable energy, i.e. solar panels, grey water filtration, geothermal pumps, etc.”

Key theme 3: “health, safety and families”

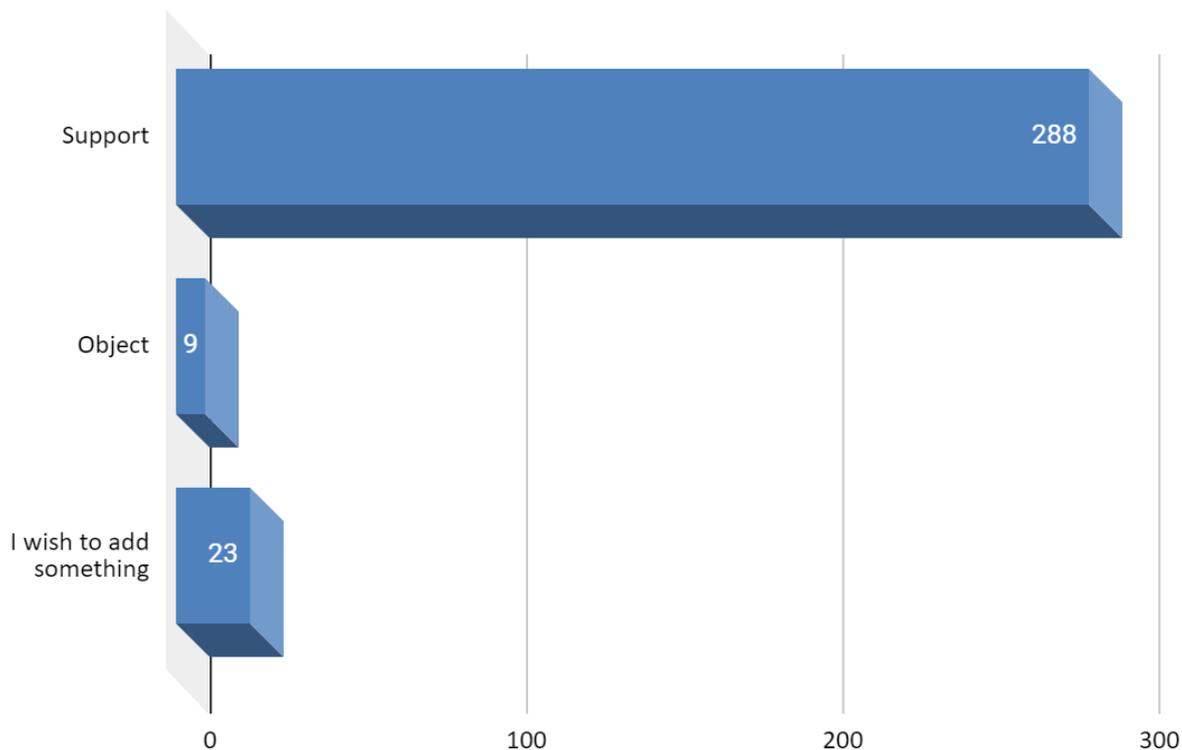
32 of 112 (28.6%) respondents aligned to this theme:

- “I have deep concerns in face of climate change about the developer putting in adequate flooding defences. I believe they are working on once in a hundred year events. when it is highly likely we will be facing more than 3 in a century flooding events in the future.”
- “New housing needs reasonable sized gardens for families to entertain their children.”
- “The new housing developments in Thanet are of such poor quality. Tiny little houses crammed into little spaces close together with tarmac everywhere increasing the risk of flooding. We need to force developers to build better housing, not just for the look and feel of the town but for the sake of those who will live there.”
- “It would also be good for walkers and encourage exercise, there should also be park areas for children.”

Question 5a: Do you support or object to our proposals for 'Theme 5 - Green and open spaces' or do you consider something needs changing?

(Question response options: 'Support', 'Object' or 'I wish to add something')

320 out of a total of 326 respondents (98.2%) answered this question.



Question 5b: What do you wish to add or comment on, with regards to this theme?

(Question response options: 'Support', 'Object' or 'I wish to add something')

116 out of a total of 326 respondents (36.3%) answered this question. However, the majority of the respondents to this question were those who were seeking to elaborate on their answer to question 5a.

Of those, the key themes were:

Key Themes

Key theme 1: "protect existing green spaces and agricultural land"

49 of 116 (42%) respondents aligned to this theme:

- “Please don't let us be one big continual housing estate, running from Garlinge through to Birchington. We need more green spaces, not less. Let's fight to keep what we already have and create more green areas for wildlife preservation and to keep our planet safe for our children and grandchildren to hopefully enjoy in the future.”
- “I strongly support this, particularly protecting our Grade 1 farm land that for millennia has provided food and open areas for people and dogs to walk.”
- “Fully support the protections of green spaces for thriving of both human and wildlife.”
- “I support ,very much not building, ever, on the Westgate countryside triangle. It is after all prime farming land. Also the "green wedges" will disappear if you consider every application as not being detrimental.”
- “Important to keep outdoor green spaces because we are losing too much to new housing estates.”
- “I believe green areas are vitally important to the Westgate area and should be preserved at all costs.”
- “It's important to have green space areas. We need these green spaces for the good of the environment. There isn't the infrastructure in Westgate eg employment, schools, rail links, roads.”
- “Let's make Westgate become a shining torch for the development and care of wildlife! Ethelbert Square and Adrian square planted with more trees e.g fruit trees to feed wildlife”

Key theme 2: “safety, health, and the importance of family-friendly spaces”

39 of 116 (34%) respondents aligned to this theme:

- “More play areas along west bay and st mildreds bay greens.”
- “This is key, our children need to play in safe green areas all of which are a key factor to Westgate's communities.”
- “The more such areas will help people's health and well being.”
- “These spaces need proper policing and warden control.”
- “The green in Adrian Square is a local hang out for drug taking and alcohol - needs cctv if it's going to stay a safe green space!”
- “We need to ensure there are spaces for young people to enjoy for free and that include facilities that are aimed at the interests of girls, not just those things that are traditionally boys (e.g. a football pitch). We also need to make sure these facilities are inclusive to those with physical disabilities and that we are considering what our autistic residents might enjoy/need and are generally more inclusive.”
- “Play areas should not just focus on toddlers. Outside equipment for teens and adults is equally important in encouraging a healthy outdoor lifestyle, especially for those who may not have funds to pay out for activities,

otherwise we would be encouraging the disparity with disadvantaged communities when we should be aiming for solutions that benefit all.”

Key theme 3: “affordability, over-development, infrastructure”

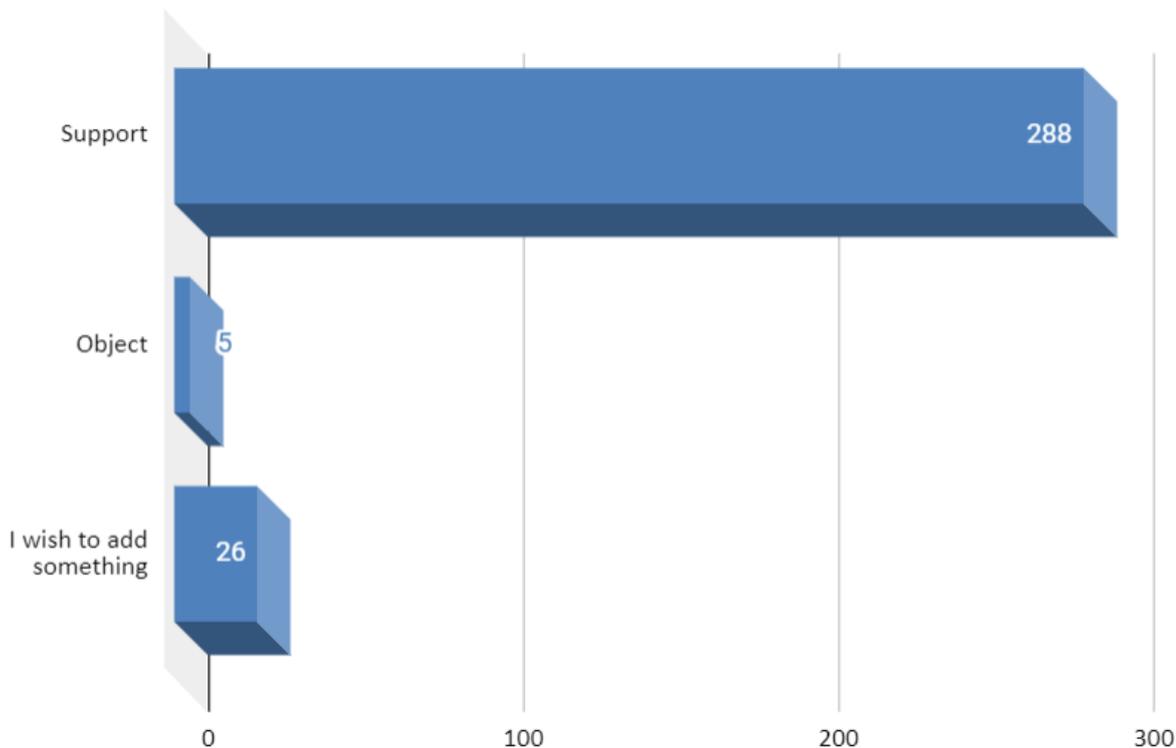
28 of 116 (24%) respondents aligned to this theme:

- “We need affordable housing. We don't need people scared of losing a few k's off their house prices.”
- “The 28 is now a nightmare through the square that already had some of the country's worst pollution problems in the country and you can't blame the public. They can only drive through the roads that are left open.”
- “We do not need any further housing in Westgate. All new developments are solely for the profits of developers and Sold to buyers from outside Thanet at prices locals cannot afford.”
- “Do we have to have more houses? We need adequate support services, like Drs, schools, roads, etc.”
- “The plan to construct houses on the farmland between Belmont Road and Garlinge are indicative that TDC care not one whit about the green wedge.”

Question 6a: Do you support or object to our proposals for ‘Theme 6 - Biodiversity’ or do you consider something needs changing?

(Question response options: ‘Support’, ‘Object’ or ‘I wish to add something’)

319 out of a total of 326 respondents (97.9%) answered this question.



Question 6b: What do you wish to add or comment on, with regards to this theme?

(Question response options: ‘Support’, ‘Object’ or ‘I wish to add something’)

101 out of a total of 326 respondents (31.7%) answered this question. However, the majority of the respondents to this question were those who were seeking to elaborate on their answer to question 6a.

Of those, the key themes were:

Key Themes

Key theme 1: “maintenance, policing, and safety”

37 of 101 (36.8%) respondents aligned to this theme:

- “Some of the trees are allowed to get too big especially trees near houses thus taking away their essential light.”

- “All trees within 5 meters of any building and more than 5meters tall should be exempted as these are the max limits of the domestic insurance market restriction.”
- “If trees are felled due to poor condition, the NP could require replanting to avoid loss of carbon reducing action and the amenity of the green canopy.”
- “Any trees removed should be replaced and cared for until established.”
- “I support this to an extent but, once a tree is a hazard or dead /causing damage etc to a property or neighbour it shouldn’t be a problem to remove it from your own property and the tree ‘police’ in Thanet shouldn’t be involved in homeowners decisions on this subject.”
- “Trees need to be managed as well as protected. Look at Adrian Square. Trees are out of control - when was the last time any surgery took place?”
- “Loved the wild flowers this year but think the roads and pavements need to be kept clear of weeds and rubbish.”

Key theme 2: “wildlife, foraging”

32 of 101 (31.6%) respondents aligned to this theme:

- “We must also consider the requirements of wildlife such as nesting birds and our bees when it comes to hedge trimming and mowing. More wildflower spaces that are well kept.”
- “Registers should be held of where foraging can occur, blackberry, damson and sloe picking for example. Shoreline foraging is another area but probably left to more expert operators who could be listed.”
- “Biodiversity could be a collective effort by raising awareness as to what people with gardens can do themselves to help to increase diversity of plants and insects. It needs to link as to how the beaches are used and biodiversity is monitored there and the public is informed.”
- “A lot depends on your idea of hazardousness. Also wildflower areas and foraging areas are fine as long as they are not part of the gutter system.”
- “Inclusion of bird and bat boxes and insect hotels. As these creatures are likely to lose habitat as a result of such a high density of housing.”
- “High level wildlife surveys needed for development areas: which actually determine presence and densities of the full range of protected species.”

Key theme 3: “over-development, minor strategies”

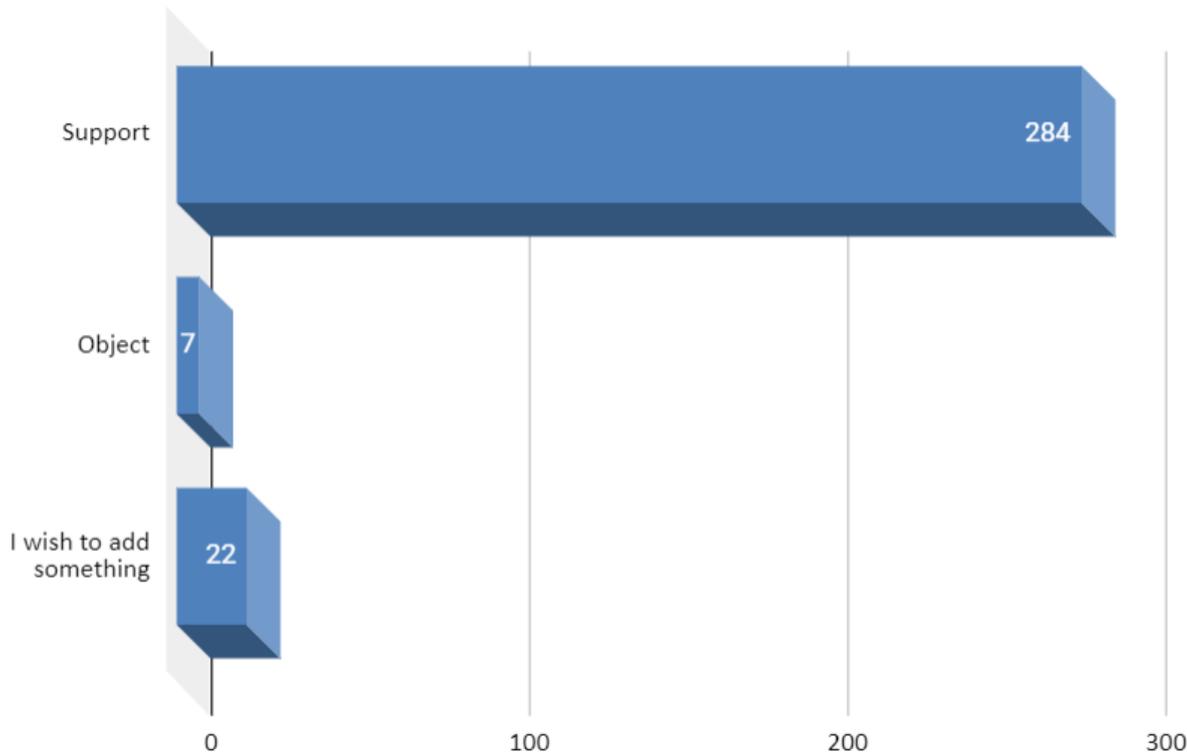
32 of 101 (31.6%) respondents aligned to this theme:

- “Housing Developments are detrimental to aims that increase biodiversity and preserve green spaces.”
- “Houses should not be allowed to concrete or flag over gardens.”
- “Inclusion of bird and bat boxes and insect hotels. As these creatures are likely to lose habitat as a result of such a high density of housing.”
- “Stop damage to trees, shrubs etc (even if there is no preservation order) and clearance of land by developers especially if planning has not yet been given.”
- “Any trees removed because of development by any builder, that builder should undertake to plant a tree in another position as agreed in the Westgate area.”
- “Green/vertical wall pollinator planting - to support biodiversity- we may not have huge walls but Scotscape make “Living Pillars, which can be mounted on lampposts. Bands of pollinators, rich plants and flowers that form a network or bug/butterfly/bee highway... and look amazing. “

Question 7a: Do you support or object to our proposals for ‘Theme 7 - Local Facilities and Infrastructure’ or do you consider something needs changing?

(Question response options: ‘Support’, ‘Object’ or ‘I wish to add something’)

313 out of a total of 326 respondents (96%) answered this question.



Question 7b: What do you wish to add or comment on, with regards to this theme?

(Question response options: ‘Support’, ‘Object’ or ‘I wish to add something’)

90 out of a total of 326 respondents (28.8%) answered this question. However, the majority of the respondents to this question were those who were seeking to elaborate on their answer to question 7a.

Of those, the key themes were:

Key Themes

Key theme 1: “library”

34 of 101 (33.3%) respondents aligned to this theme:

- “The preservation of the library is crucial. Some future plans for it are important. Also the community centre needs protecting and plans made.”
- “Strongly support updating Westgate iconic library and use of the first floor . Also improvement of the community centre and the dreadful carpark there but think this should be carried out without having to rely on a new development being built in location.”
- “Development of the library will be fabulous. It’s a great building and feels very neglected and underused.”
- “The Library must be improved as its a vital part of our town. This building could be so much better used. Needs a full survey as to what services it can offer as its never used to its full potential. If this is not done KCC will soon get rid of this valuable resource.”
- “Why not move the library to the empty shops in the main town - might get better use--sell the library for housing- but keep the outline of the building.”
- “Definitely invest in existing assets, particularly the library which has a great location (as in easy for all to reach) and should be open much longer with space for events and activities for all.”

Key theme 2: “housing, dentists, doctors”

28 of 101 (27.8%) respondents aligned to this theme:

- “We desperately need dentists who take NHS patients. I am unable to find a dentist. Also, Westgate Surgery needs more doctors as they clearly have too many patients for the number of staff they currently have.”
- “Proposed Housing developments will have a detrimental impact on Gp and sewage capacity.”
- The doctor’s surgery too is a busy place and would struggle to cope with more people, similarly the schools.”
- “The proposed building of the house behind Westgate etc will doubtless generate and increased population of some 8 to 10 thousand peoples and there is Insufficient GP cover in Westgate now!!!! I’ve been unable to see my doctor for months. This needs to be thought about and real issues face head on, not just brushed aside. New town should be built not just to raze thousands of houses onto existing villages. It just destroys them in time.”
- “No further development of housing is required .”

Key theme 3: “transport, including roads and parking”

45 of 101 (44.4%) respondents aligned to this theme:

- “A pedestrianised crossing is needed in St Mildreds Road. Its a nightmare to cross safely.”
- “I am not sure if I am in the correct section but would like to comment on the continued overnight parking along Sea Road of motor homes. These cause dangerous obstruction of view, especially at the points where the road

bends and make it dangerous for pedestrians to cross. Also, speed restrictions and/or road humps should be put in place during the winter, if not one day there WILL be a serious accident.”

- “More cycling infrastructure; cycle lanes and bike parking, would be welcome.”
- “Fully support all. Speed limits on certain roads need to be implemented ASAP.”
- “If the proposed housing goes ahead I am very concerned about the impact on our community. It is often hard to find parking in station road, more people would increase the number of cars needing to park and add to traffic around the town.”
- “Speed bumps should be installed on Minster Road to reduce traffic speed.”
- “Minster Road and Lymington Road are race tracks, with speeding cars hurtling down these roads which house a school and two main recreational areas. Traffic calming is a must.”
- “CIL should be preferred to s106. Would like to see improvements for cyclists - in conjunction with KCC’s proposals for Canterbury Rd - as Thanet is in the dark ages in this respect.”

Key theme 4: “safety, wellbeing, accessibility”

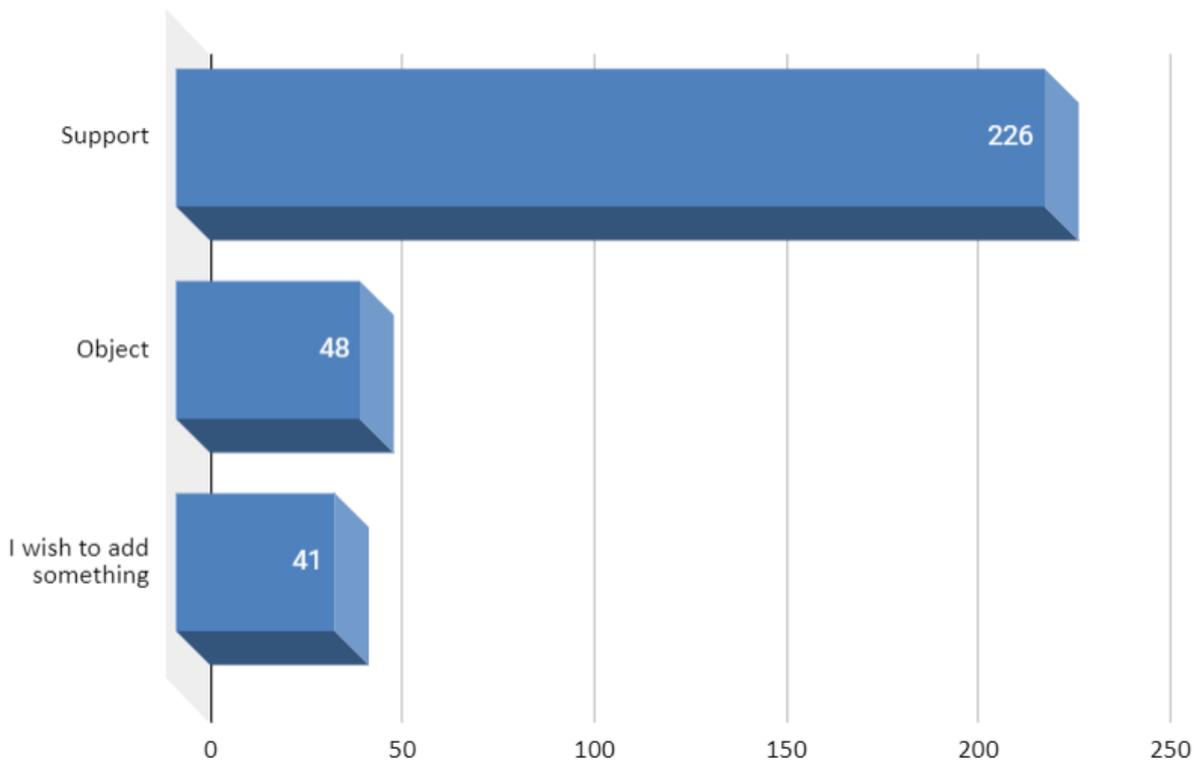
28 of 101 (27.8%) respondents aligned to this theme:

- “All essential to the well being of our residents and especially for any new developments within our area.”
- “A pedestrianised crossing is needed in St Mildreds Road. Its a nightmare to cross safely.”
- “Need to have facilities for local people accessible on the bays all through the year. Toilet facilities are appalling and usually locked. This often includes disabled facilities which is not acceptable and against the law. Perhaps need to look at beach facilities in other countries. Shower facilities need to be updated as very old and unhygienic.”
- “Get the skatepark rebuilt by a company that isn't the clowns who built Broadstairs and minster. The current one is unsafe and there's a huge risk of claims on public liability insurance if anyone were to injure themselves through lack of said maintenance.”
- “Need to have facilities for local people accessible on the bays all through the year. Toilet facilities are appalling and usually locked. This often includes disabled facilities which is not acceptable and against the law. “

Question 8a: Do you support or object to our proposals for ‘Theme 8 - new housing developments’ or do you consider something needs changing?

(Question response options: ‘Support’, ‘Object’ or ‘I wish to add something’)

315 out of a total of 326 respondents (96.6%) answered this question.



Question 8b: What do you wish to add or comment on, with regards to this theme?

(Question response options: 'Support', 'Object' or 'I wish to add something')

135 out of a total of 326 respondents (42.9%) answered this question. However, the majority of the respondents to this question were those who were seeking to elaborate on their answer to question 8a.

Of those, the key themes were:

Key Themes

Key theme 1: “sustainability, green spaces, wildlife”

58 of 135 (42.6%) respondents aligned to this theme:

- “17. More detailed reference to statute (Section 19 of the Climate Change Act) as opposed to guidance of the NPPF. Development must show significant and robust methods of, and delivery on, essential and innovative carbon reducing methods. Westgate-on-Sea should be a showcase for modern, sustainable and environment-positive house building.”

- “Protect green areas from development and renovate empty properties.”
- “If all unoccupied properties within the area were forcibly used for housing there would not be the need for building on our precious green belt land, threatening the habitat of birds and wildlife and taking away our irreplaceable farmland and disrupting the ecosystem as a whole.”
- “I do not know how this could be done. If our fields are developed the local character will be gone and our landscape and views ruined. Birds will have nowhere to live. Food production, carbon capture will all be down the pan. This area will flood, temperature will rise exacerbated by hard landscaping: Huge contribution to global warming!”
- “No new housing development can protect the wildlife that was previously there. Also the infrastructure such as medical facilities, schools et cetera will be difficult to put in place.”
- “The new build between Sussex Gardend & St Mildreds court has taken away the privacy and sunlight of Sussex Gardensi - "is sustainable in terms of wildlife, biodiversity and climate change" this build was strongly opposed. They cut down a beautiful big green hedge and killed all the wildlife that was living in it. Local residents have also lost a lot of parking spaces.”
- “Do not build on green natural spaces please.”
- “Good luck with this. What’s proposed looks to be cheaply-built, generic so-called executive homes with the minimum the developers can get away with in terms of biodiversity, community infrastructure and protection of existing amenity.”

Key theme 2: “over development, supporting infrastructure ”

52 of 135 (38.1%) respondents aligned to this theme:

- “There isn't any room left for new housing developments!”
- “I don't think housing developments should've been approved in St Mildred's Court area as it is decreasing the value of the housing in the square significantly, bringing down the local economy.”
- “We should not lose prime farmland for housing. Any new development needs the infrastructure to go with it. Doctors, school capacity and road access.”
- “No new housing is needed. Westgate is already full of “dross from London” DFL's are easily identified... they keep their rubbish bins in their front gardens.”
- “We are already overcrowded.”
- “We do not want new developments. Westgate needs to keep its unique village atmosphere.

- I strongly disagree with the proposal of the large new housing estate - to be built on prime farming land! We do not have the infrastructure to support it & it will lead to flooding, the destruction of wildlife & not to mention losing this wonderful farming land.”
- “The report published by Dr.Chris Whitty and focused on by South East Today on BBC1 on 27th September are clear indications that current infrastructure would be unable to support the building of a large number of houses in Westgate and must be deferred.”
- “Please ensure access to Doctors, Dentists, Schools is available before any more homes are built! We are currently having to travel to Herne Bay to see a dentist - not very eco friendly???”
- “No to high rise buildings, but there is a need for new developments for small, young families, i.e. small houses.”

Key theme 3: “quality, affordability, local-oriented”

39 of 135 (28.6%) respondents aligned to this theme:

- “The quality of houses being built in the Thanet area is diabolical. They are nothing more than shoe boxes, which are not built to last. The supported housing that is spoken of is a fallacy, where properties are of an even lower quality than others in the street. What we need is good quality council houses, available for people to rent, instead of properties being built, and then sold to people/councils from out of the area, or even private landlords who will push rents up even further.”
- “Quality housing and supporting infrastructure is a must.”
- “I would like to see that new housing is properly affordable and fills a requirement for additional homes and properties are not the most expensive a developer can knock out for as cheap as possible just to increase profits. I have no problem with developers making a profit but it should not be at the expense of our quality of life or the real requirement for additional housing.”
- “A large number of young people locally will not be able to afford to buy any of the proposed new dwellings.”
- “The new housing developments in Thanet are of such poor quality. Tiny little houses crammed into little spaces close together with tarmac everywhere increasing the risk of flooding. We need to force developers to build better housing, not just for the look and feel of the town but for the sake of those who will live there.”
- “With all of the planned projects it seems that the roads and "affordable housing" is left until the company runs out of money. Perhaps these things should be done prior to any other work!”

Appendix 3a – List of Consultees inc Statutory, Businesses/Organisations

NP Consultation Westgate Regulation 15	Method	Date sent	
Organisation			
Westgate on Sea Community Centre Association	Hand deliver	29.09.21	
St Saviours Church	Hand deliver	29.09.21	
Christ Church United Reform Church	Hand deliver	29.09.21	
Westgate & Westbrook Residents Association	Email	29.09.21	
St James Church	Hand deliver	29.09.21	
Kent County Council	Post	29-Sep-21	
Thanet District Council	Hand deliver	29.09.21	
Birchington Parish Council	Email	29.09.21	
Margate Charter Trustees	Hand deliver	29.09.21	
Broadstairs & St Peters Town Council	Email	29.09.21	
Ramsgate Town Council	Email	29.09.21	
Acol Parish Council	Email	29.09.21	
Minster Parish Council	Email	29.09.21	
Cliffsend Parish Council	Email	29.09.21	
Manston Parish Council	Email	29.09.21	
St Nicholas at Wade Parish Council	Email	29.09.21	
Coal Board	Post	29-Sep-21	
Homes England	Post	30.09.21	
Natural England	Post	29-Sep-21	
Environment Agency	Post	29-Sep-21	
English Heritage	Post	29-Sep-21	
Network Rail	Post	29-Sep-21	
Highways Agency	Post	29-Sep-21	
Marine Management Organisation	Post	29-Sep-21	
Waldon Telecom Ltd - have telecommunication masts in the area	Post	29-Sep-21	
BT and Openreach	Post	30.09.21	
East Kent Primary Network - CARE	Post	29-Sep-21	
UK Power Networks	Post	30.09.21	
National Grid	Post	29-Sep-21	

Southern Water	Post	29-Sep-21	
Changing Minds	Email	29-Sep-21	
Westgate Heritage Centre	Hand deliver 29.09.21		
Westgate Business Forum	Email	29-Sep-21	
Westgate Youth Project	Email	29-Sep-21	
Turkish Community Centre	Hand deliver 29.09.21		
Rotary Club	Email	29-Sep-21	
Masonic Centre	Post	30.09.21	
Margate Civic Society	Hand deliver 29.09.21		
St Saviours School	Hand deliver 29.09.21		
Ursuline School	Hand deliver 29.09.21		
St Crispins School	Hand deliver 29.09.21		
Chartfield School	Hand deliver 29.09.21		
Piggybank Nursery	Hand deliver 29.09.21		
Cheeky Monkeys Nursery	Hand deliver 29.09.21		
Coastguard	Post	30.09.21	
East Kent Mencap and Disability Info Services Kent	Email	30-Sep-21	
Access Thanet	Email	29.09.21	
Disability Drop-in Centre - Kent Innovation Centre	Post	30.09.21	
United Services Club	Email	29-Sep-21	
Westgate Social Club	Email	29-Sep-21	
Greek Community Centre	Hand deliver 29.09.21		
Westgate Golf Club	Email	29-Sep-21	
Westgate Cricket Club	Email	29-Sep-21	
Millwood Designer Homes	Email	29-Sep-21	
Gillings Planning Consultants	Email	29-Sep-21	
Housing Action Group	Email	29-Sep-21	
Conservation Area Advisory Group	Hand deliver 29.09.21		
Garlinge Residents Association	Email	29-Sep-21	



Westgate-on-Sea Town Council is carrying out a consultation on its proposed Neighbourhood Plan.

Now is the chance to have YOUR voice heard!

Westgate-on-Sea Town Council has been working in partnership with residents to develop a draft Neighbourhood Plan, which aims to set out a collective vision for our area for the coming years.

We believe that our proposed Neighbourhood Plan provides a sound strategy for our local economy and future improvements to our facilities and services.

Most importantly it seeks to secure our local design needs in the approach to new housing development, which includes the protection of our valuable heritage our green open spaces, the plentiful biodiversity and our town's coastline that is so attractive to visitors and beneficial for all who live in the town.

A Neighbourhood Plan cannot alter the Thanet Local Plan, a vital document protecting us all

from unregulated development. However, if agreed by the community, a Neighbourhood Plan becomes a legal part of the District's Local Plan and it is able to help control how future development is designed for Westgate-on-Sea and helps to safeguard the character of our area.

Your views matter and your ideas can help shape our Neighbourhood Plan before it goes to a referendum, a general vote by all interested members of the community.

This leaflet explains how to take part in the consultation and have your voice heard.

If you have any questions, or would like more information on our Neighbourhood Plan, please visit the town council's website at <http://www.westgateonsea.gov.uk> (and select 'Planning'), telephone us on 01843 836182 or email townclerk@westgateonsea.gov.uk.

Published by Westgate-on-Sea Town Council, 78 St Mildreds Road, Westgate on Sea, Kent, CT8 8RF
Telephone 01843 836182 Email admin@westgateonsea.gov.uk

Take part in the survey – see over for details



Have your say on each of the Key Themes within our draft Neighbourhood Plan

Our draft Neighbourhood Plan contains ideas and proposed policies covering a range of particular themes, all linked to the future of Westgate-on-Sea. We want to hear what you think about our proposals.

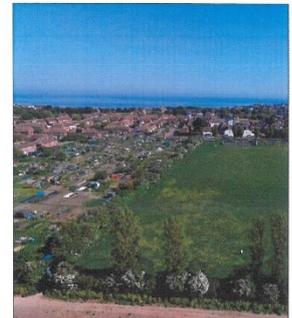
The themes contained within the draft plan are:

- How we design the future of our community
- Our Local Economy
- Our Local Heritage
- Sustainability
- Green and Open Spaces
- Biodiversity
- Local Facilities and Infrastructure
- New housing developments

For each of the themes, you will be able to say whether you support or object to the proposals we have set out, as well as being able to suggest additions for us to consider.

You will also have the opportunity to tell us what projects you would like the Town Council to be carrying out on behalf of the community, and to share any other thoughts and ideas you have.

Please take part in our consultation today and



have your voice heard as we seek to shape the future of our town and community. This is the final opportunity for you to have your voice heard about our proposed Neighbourhood Plan, before it is submitted to Thanet District Council.

Two ways to have your voice heard about the future of Westgate-on-Sea

1 Complete the Survey online
To complete the survey from the comfort of your own home, either use your phone to scan the QR code or visit our website at www.westgateonsea.gov.uk

2 Complete a paper copy of the Survey
If you require a paper copy of the survey, please call 01843 836182 email admin@westgateonsea.gov.uk



Appendix 4 – Response to Comments

Kent County Council

Re: Westgate-on-Sea Neighbourhood Plan (2021-2031) Pre-Submission September 2021 - Regulation 14 Consultation

Thank you for consulting Kent County Council (KCC) on the Westgate-on-Sea Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the document.

Westgate-on-Sea Neighbourhood Plan (2021-2031) Pre-Submission September 2021 Section 1 -

Introduction

Highways and Transportation: The County Council, as Local Highway Authority, is disappointed that the Neighbourhood Plan appears not to address several key areas in respect of highways and transportation. The Neighbourhood Plan should provide more focus on how people access Westgate, and its services and facilities. It should consider improvements to encourage walking, cycling and use of public transport and these should be outlined within a 'Movement and Connectivity' chapter, with associated policies supporting delivery.

The County Council is also concerned that the Neighbourhood Plan advocates the diversion of section 106 funding away from much needed road infrastructure that will serve Westgate on-Sea and the wider district, towards schemes and projects that will not assist in managing the traffic impact that is expected from planned development.

The County Council considers that this section would benefit from being more positively worded. It currently focuses on the development already allocated in the Thanet Local Plan and the fact that the Town Council was opposed to the Plan, rather than positively summarising the challenges that will need to be faced moving forward.

Section 3 - The Neighbourhood Development Area

Figures 3.1 Neighbourhood Plan Area

Public Rights of Way (PRoW): The County Council requests that the map is revised to include the routes of the PRoW in the marked area - Public Bridleway TM28 and Public Footpaths TM26, TM27 and TM42. An extract of the Definitive Map should be held by the Town Council; if not, KCC is able to provide upon request.

Section 7 - About Westgate-on-Sea

PRoW: The PRoW network assets should be referenced within this section, with detail as to how the current PRoW network supports local transport choices. The text should also clarify that the KCC has a statutory duty to ensure the network is recorded, protected and maintained in partnership with the Town Council. The newly legislated National Trail - the England Coast Path - should also be referenced as it brings significant tourism opportunities to the area and should be incorporated in any planning or improvements along the coastal route.

Public Health: The County Council would recommend that consideration around the health and wellbeing of residents should be made throughout the Neighbourhood Plan. It is important to understand the health needs of the current and future population and the opportunities which the Neighbourhood Plan could provide to improve health and wellbeing for residents. Evidence should be used from the [Kent Joint Strategic Needs Assessment](#) (JSNA) and other sources of public health data from the [Public Health Outcomes Framework](#) (PHOF) - including ward level data - in addition to referencing how these policies support the [Kent Health and Wellbeing Strategy](#).

Consideration in the Neighbourhood Plan to the health and wellbeing of local residents would support guidance within the National Planning Policy Framework (NPPF) (Section 8), that recommends planning policies should aim to support healthy, inclusive and safe places which enable and promote healthy lifestyles. This is especially prevalent where this would address identified local health and well-being needs. For example, through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

Westgate-on-Sea performs significantly worse on a number of health indicators than the England, Kent and Thanet averages. These indicators include 'Life Expectancy' and the percentage of 'people who report having a limiting long-term illness or disability'. There are also a number of borough level indicators that Thanet overall performs significantly worse than both Kent and England. It is important this data is recognised and that there are policies

2

within the Neighbourhood Plan that seek to support and improve the health needs of the current and future population.

The County Council notes that on page 12, the Neighbourhood Plan states that Westgate is fairly affluent – however, KCC is not clear how this is justified as levels of deprivation are actually above the England and Kent averages. In addition, Westgate-on-Sea performs significantly worse than England and Kent averages on income deprivation, older people in poverty, and unemployment. It is important that data and evidence is used to accurately reflect and justify policies and objectives to improve the health and wellbeing of residents in Westgate-on-Sea.

Section 8 - Our vision and objectives for Westgate-on-Sea

Highways and Transportation: The County Council notes that this section of the Neighbourhood Plan outlines the vision and objectives for Westgate-on-Sea which includes a key aim of protecting the environment. Highway

and transportation measures and policies can play a key part in meeting these objectives, as well as making the area more sustainable. This is not strongly reflected within the objectives which makes little or no reference to the need for development to consider active travel.

The County Council considers that Objective 6 could potentially be expanded to include reference to sustainable travel measures within the town (including active travel). There is limited reference to the Thanet Transport Strategy (TTS) throughout the document which provides a strategic backbone for transport interventions within the district. This Neighbourhood Plan should complement the TTS with specific, locally focussed transport policies/community projects. It is noted that highway accessibility is addressed (in part) within the guidelines included within section 10, however, these matters are potentially better suited to being included within an additional chapter that seeks to address movement and connectivity specifically.

Section 9 -Schedule of planning policies

Highways and Transportation: There are no specific highway or transport based policies included within this Neighbourhood Plan. The County Council, as Local Highway Authority, considers that this represents a missed opportunity to highlight movement and connectivity issues such as improved access to the railway station and highway safety/amenity. Further consideration is recommended to the inclusion of a specific policy section for movement and connectivity that could encompass highway and transport related matters.

Section 10 - Design

WSNP1 – Protection of seafront character

Provision of County Council Community Infrastructure and Services: It is recommended that consideration is given to the fact that any increase in households requires a proportionate increase in sustainable infrastructure provision, commensurate with the profile of the occupants.

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Policy WSNP2 – Design Guidelines

Provision of County Council Community Infrastructure and Services: The County Council is supportive of the objective of promoting quality design in the built environment - including design that improve energy efficiency and renewable energy. KCC is in the process of developing the Kent Design Guide (to which a current consultation is being undertaken) in order to promote the principles of quality design in new development and reference to this document is recommended.

Policy WSNP3 – Safeguarding Leisure & Tourism facilities / Policy WSNP Protection of shopping areas / Policy WSNP5 Retention of employment space

Provision of County Council Community Infrastructure and Services: Consideration should be given to the fact that any increase in households requires a proportionate increase in sustainable infrastructure provision, commensurate with the profile of the occupants.

PRoW Public Rights of Way (PRoW): The County Council recommends that reference is made to the County

Council's ROWIP (Rights of Way Improvement Plan) to better enable partnership working to continue and deliver improvements to the PRow network in Westgate. The Neighbourhood Plan should consider the need for accessible tourism, leisure, shopping and employment facilities - for residents and visitors to the area. The PRow network and the ROWIP has a critical role in this, and as such there should be specific mention to the need to support improvements to walking and cycling routes where they can assist the County Council's objectives within the ROWIP.

Section 12 – Heritage

Heritage Conservation: The County Council will engage directly with the Neighbourhood Plan Steering Group to discuss the heritage conservation content of this Neighbourhood Plan.

Section 13 - Sustainability

Policy WSNP9 – Low Carbon Development

Provision of County Council Community Infrastructure and Services: The County Council is supportive of the aspiration to ensure that new developments pursue sustainable building practices.

PRow: Reference should be made to the opportunities offered through the PRow network for sustainable transport and connectivity. County Council policy seeks to improve and upgrade the PRow network where it links with amenities, public transport nodes, work and education to increase the attractiveness of Active Travel and support modal shift – this should be reflected within the Neighbourhood Plan.

Policy WSNP11 –Designation of Local Green Spaces (LGS)

Public Rights of Way (PRow): The County Council is supportive of this policy.

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Section 14 -Green and open spaces

Section 14.2

PRow: The provision of high quality open green spaces and opportunities for outdoor recreation should be a priority within the Neighbourhood Plan. It should aim to increase the provision of accessible green spaces and improve opportunities to access this resource. Good public transport and active travel links with open spaces should be made available so that the public are not dependent on private vehicle use for visiting these sites.

Section 14.3

PRow: The County Council recommends that Public Bridleway TM28 and the relevant Public Footpaths should be referenced specifically. KCC recommends that reference is also made to the ROWIP which aims to aid decision-making and promote good design in PRow and countryside access management.

Policy WSNP13 Westgate Countryside Triangle

Highways and Transportation: Whilst the intentions of this policy are understood, it is important to highlight that the Shottendane Road corridor is currently earmarked for improvement within the TTS and Local Plan Infrastructure Delivery Plan (IDP). As these highway improvements may require some of this land to be delivered in the most appropriate way, this policy should facilitate a level of flexibility to enable road widening and footway/cycleway infrastructure to be delivered without a policy conflict.

PRoW: Specific reference should also be made to the PRoW within the site (TM28). *Policy*

WSNP14 Building on the best and most versatile agricultural

Highways and Transportation: The County Council draws attention to its comments in respect of Policy WSNP13 which are also applicable to this policy.

Section 16 - Facilities

16.2 Infrastructure of Westgate-on-Sea / Policy WSNP17 – Safeguarding community facilities

Provision of County Council Community Infrastructure and Services: The County Council is supportive of the objective of safeguarding existing community facilities provided that they currently (or could in the future), meet the evolving needs of the Westgate community and provide appropriate space for relevant and evolving needs. However, the safeguarding of community facilities should not be limited only to the preservation of buildings. Other forms of community facilities such as resources for outreach youth work, or social care to support the elderly to live independently, should also be considered valuable.

Highways and Transportation: The County Council, as Local Highway Authority, would refute the suggestion within this section that the Transport Plan (which it assumes to be a

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reference to the TTS) was not written in conjunction with planned housing. The TTS was developed over several years (in conjunction with the Local Planning Authority) within the context of the Local Plan process, where several changes were made to draft land allocations. Substantial housing allocations were identified within Westgate and Birchington at an early stage of the process which were increased in size as the Plan progressed, and these increases were considered as the TTS evolved at each stage.

The principles of the TTS, and specifically the Inner Circuit Route Improvement Strategy (ICRIS), were communicated to elected council members throughout the plan making process. The draft TTS document was included within the Regulation 19 consultation undertaken by the Local Planning Authority which local stakeholders had an opportunity to comment on. The Draft TTS was also referred to at the Local Joint Transportation Board, where it received a very positive response. It is relevant to point out that recently, KCC, as the Local Highway Authority, has gratefully received support from the Town Council for the ongoing bid to the Department for Transport for grant funding towards the delivery of sections of the ICRIS. Therefore, KCC would encourage the Town Council to reconsider the text in this section of the Plan.

The provisions within policy WSNP18 are already encompassed within the NPPF and do not need to be replicated within this Plan.

Policy WSNP18 – Provision of Infrastructure

Provision of County Council Community Infrastructure and Services: The County Council is supportive of the objectives of this policy and strongly agrees that any new development should provide mitigation for its impact on existing services.

Infrastructure to support proposed new development in Westgate will need to be considered above and beyond those specifically named in Section 16.2 (i.e. road improvements, the provision of doctors and dentists and sewerage capacity).

Other county services that will require infrastructure contributions/provision are:

- Primary education, as well as early years nursery provision – through the provision of a new on-site 2FE primary school and nursery
- Special Educational Needs (SEN) provision – through planned expansion at specific schools (Garlinge Primary, Hartsdown Secondary and East Kent Junior College)
- Secondary education – through the delivery of the new Park Crescent Secondary School
- Social care – five key priority areas (see comments below on WSNP21)
- Adult education – through the improvement of existing facilities at Hawley Square and by extending adult education classes into the community
- Youth services – through targeted outreach services according to need
- Libraries – improvements at Westgate Library (see further detail in WSNP20 below)
- Waste processing – through the Margate Household Waste Recycling Centre (HWRC) expansion project
- High speed broadband for all new dwellings

6

PRoW: The County Council recommends that this policy should include walking and cycling connectivity across the Parish, giving priority to Active Travel routes as appropriate.

16.3. Contributions from Community Infrastructure Levy

Policy WSNP19 –Community Infrastructure Levy

Provision of County Council Community Infrastructure and Services: The County Council raises a query as to the inclusion of this policy and its wording given that Thanet District Council has not adopted the levy. If CIL was to be adopted by Thanet District Council, KCC will require allocations from funds received to mitigate impacts upon its services locally from new development to avoid any reduction/dilution of services to existing residents.

16.4 Section 106 monies

Highways and Transportation: The supporting text in paragraph 16.4 appears to raise concerns over the delivery mechanism for the new road system (ICRIS), but then suggests that the contributions towards highway infrastructure should instead be diverted to projects identified within Appendix 1. The projects set out in Appendix 1 do not provide an alternative strategy to manage the traffic impacts of development. Therefore, this

approach is not supported by the Local Highway Authority. The evidence provided by the Local Highway Authority and Local Planning Authority at the Thanet Local Plan examination provides an overview of infrastructure apportionment which developments are expected to broadly comply with. In tandem with this funding stream, KCC is exploring potential external funding streams with an aim to provide ICRIS infrastructure as soon as possible. Whilst the timing of infrastructure is still subject to more detailed discussions and appraisal, KCC, as the Local Highway Authority, remains committed to pursuing funding for the delivery of the ICRIS and this should be reflected within the text.

PRoW: The County Council would recommend that specific mention is made to the need to improve and enhance the PRoW network to enable safe and attractive walking and cycling connections and links from new developments to community facilities. An increased population will undoubtedly add to the pressure and importance of the surrounding PRoW network. It is critical therefore that some general wording is included within this section to secure funding to ensure these highly regarded links are not degraded. Developer contributions could be used to upgrade existing routes or create new path links that address existing network fragmentation issues.

Policy WSNP20 – Section 106

Provision of County Council Community Infrastructure and Services: The County Council is supportive of the allocation of section 106 monies in mitigating the impact of the development across all relevant county services (as listed above), including highways.

KCC supports the allocation of section 106 monies to local services and facilities such as those listed in Appendix 1 if these facilities can meet the evolving needs of the local community and are the most effective way of delivering services.

7

Westgate Library does not currently meet inclusivity standards and KCC supports the allocation of section 106 library monies to this project. KCC proposes that a new lift is installed to allow the building to be used to its full capacity and additional monies may be used to further enhance local library services and resources such as through the provision of book stock and/or digital library resources.

KCC would not support the ring-fencing of all section 106 community services contributions, for a single community centre. Whilst the Lymington Road Community Centre listed in Appendix 1 may be very close to a development site, it would not be appropriate to limit the monies to one building. The Lymington centre may also not be the most appropriate support for the community requirement(s) at the time of need.

As referenced in section 16.4, the upgrading of existing buildings and the provision of new physical infrastructure (such as a sports centre or skate park) is one way, but not the only way, to deliver facilities or resources for young people. The needs of young people and the support they require is continuing to evolve in a post-Covid-19 society. Youth outreach work to address more complex needs such as substance abuse or mental health crises cannot be addressed without the adequate resourcing of services delivered under Early Help and Preventative Services (EHP).

Section 17 - New Developments

PRoW: Specific mention should be made to improving and enhancing the PRoW network, both within, and connecting to, the area between Westgate and Garlinge, as identified by the red dot line. This is to enable safe and attractive walking and cycling connections and links from new developments to community facilities.

Reference is also recommended to the presence of Public Bridleway TM28 and Footpaths TM26, 27 and 42, and the connection to Footpath TM23 from TM28.

WSNP21 Policy Statement – the houses allocation on the agricultural land in Westgate and Garlinge

Provision of County Council Community Infrastructure and Services: The County Council sets out its comments below:

Strict 30% affordable housing quota - KCC supports new developments of mixed dwelling types and homes to meet a range of needs in the community. The affordable housing requirement of 30% must be balanced against required development contributions to support local infrastructure to ensure sustainable and viable growth.

Support for semi-assisted and assisted accommodation for the elderly – KCC supports the principle of enabling the elderly to remain in their own homes and/or live independently in accommodation with assistance on-site. Indeed, since the onset of Covid-19, there has been a significant decrease in the number of social care clients choosing to go into traditional care home settings. This shift towards specialist housing for the elderly has significant implications for the way in which these people need to be supported by county social care services and is requiring continuous adaptations in how assistance and care is provided.

8

As such, with regard to section 106 contributions for this proposed development, it is important that resources are directed towards five key areas to increase capacity in Adult Social Care. These are:

- Assistive technology and home adaptation equipment – to enable people to continue to live independently
- Specialist Housing – Adult Social Care will purchase nomination rights from registered housing providers
- Adaptations and improvements to existing community facilities to enable all to be able to access these
- Provision of sensory facilities
- Provision of changing place facilities to enable those with profound physical and mental health issues (and their carers) to remain active and as independent as possible.

PRoW: Reference to the PRoW network and the ROWIP is recommended. It is imperative that open spaces within a development can be accessed through sustainable modes of transport. To encourage active travel provision and onward connectivity across the wider area, the wording of this text should be strengthened.

Policy WSNP22 Protection of residents abutting the new development

PRoW: The County Council is supportive of this policy as it is essential to ensure the existing communities and new development are linked to provide permeability and connectivity to reduce reliance upon short car journeys.

Section 18 - Community Actions

Policy CA8 - Activities for young people

Provision of County Council Community Infrastructure and Services: KCC supports the involvement of local people and businesses in the provision of activities for teenagers, including sports and activity clubs.

This would not remove the requirement for section 106 monies to support the KCC youth service to meet more specialised and complex needs of young people in the Westgate community which require continued funding to provide resources for outreach work.

Section 19 - Local housing needs assessment

Policy CA11 Local housing needs assessment

Provision of County Council Community Infrastructure and Services: Any housing needs assessment should include specialist housing for the elderly, and vulnerable adults with learning and physical requirements.

9

Appendices

21.1 Appendix 1 – CIL and S106

PRoW: Specific mention should be made to improving and enhancing the PRoW network to enable safe and attractive walking and cycling connections and links from new developments to community facilities. An increased population will undoubtedly add to the pressure and importance of the surrounding PRoW network. It is critical therefore to secure funding to ensure these highly regarded links are not degraded. Developer contributions are used to upgrade existing routes or create new path links that address existing network fragmentation issues. Consideration should therefore be given to the appropriate investment of development contributions into the PRoW network.

21.2 Appendix 2 – Policy SP17 of Thanet Local Plan

Provision of County Council Community Infrastructure and Services: The County Council supports the requirement of 2.05 ha land (to be provided at the cost of the developer) to accommodate a new two-form entry primary school, to include nursery (early years) provision. KCC would also emphasise the requirement for special education needs contributions in line with the increased local demand to be created by the new development, and secondary contributions towards the land acquisition and build costs for the new Thanet Park Crescent School.

PRoW: The County Council welcomes early engagement on any development where PRoW would be directly affected by the proposals and welcomes the inclusion of plans which clarify intentions for positively accommodating, diverting or enhancing paths.

Additional Comments

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, confirms that there are no safeguarded minerals or waste management facilities within the Neighbourhood Plan area. Therefore, the Plan does not have to be considered against the safeguarding exemption provisions of Policy DM 8: Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities of the adopted Kent Minerals and Waste Local Plan 2013-30. KCC can also confirm that the Neighbourhood Plan area is not coincident with a safeguarded mineral deposit. The County Council would recommend that reference is made within the Neighbourhood Plan to the Kent Minerals and Waste Local Plan (as Partially Reviewed) 2013-30, as although economic minerals are absent, it is possible that waste management and/or mineral related development could be proposed in the area in the future. Waste Management: The County Council, as Waste Disposal Authority, has no comments on the Neighbourhood Plan. It should, however, be noted that KCC is currently engaging with District Council in respect of Household Waste and Recycling Centre (HWRC) capacity to ensure that the impact of growth in the district is appropriately mitigated. KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Town and Country Planning (General) Regulations 2012: Consultation under Regulation 14: 24 September -19 November 2021

WESTGATE ON SEA NEIGHBOURHOOD PLAN

Formal comments from Thanet District Council

The Council welcomes the opportunity to comment on the Westgate on Sea draft Neighbourhood Plan. It is clear that there is a strong concern to improve the town and preserve the many important characteristics that the town currently boasts.

The Council's formal response to the draft Neighbourhood Plan is set out in the table below.

A draft of the plan was sent to the Council in 2019 and informal comments were provided on behalf of the Council by Places4People. These comments have now been included as part of our formal response. Where it is clear that a response has been acted upon, these have been highlighted in grey. The remaining unhighlighted comments form part of this formal response.

Page/ Paragraph/ Policy No.	Comment
Various policies	Remove any references to the Town Council from policy wording - policies should be 'authority neutral'

Section 5 - final paragraph	The policies have not changed significantly since the initial screening, so a further screening is unlikely to be necessary
WSNP1	Chapter 11 of the NPPF requires substantial weight to be given to the value of using suitable brownfield land within settlements for homes, and supports the development of under-utilised land and buildings, especially if it would help to meet identified needs for housing (para 120 c) and d). This policy is therefore contrary to the NPPF.
WSNP2	The character and design requirements mentioned in the text could be included in the policy to give it more weight.
WSNP4	This Policy conflicts with adopted Local Plan policy E06 which states that residential accommodation will be permitted in District and Local centres where this would not fragment or erode the active frontages of such locations to a degree that undermines the function of the centre. The impact assessment proposed in the policy could be used as a tool to assess this.
p35	Reference to EV charging points in local plan policy is incorrect. It states Proposals for residential development on sites allocated in this plan must: 1) Provide one electric car charging point for every 10 parking spaces provided in communal areas, or one charging point to be provided for every new dwelling with parking provision within its curtilage; not for developments over 10 units.
P37	Local Green Spaces - only 5 of the 6 were accepted by TDC - Esplanade, (Esplanade Gardens) was not designated as Clifftop areas were not deemed appropriate. The cliff top gardens are already protected open spaces in the Local Plan. To be consistent with the Councils approach to LGS allocation, Esplanade Gardens should be removed.
WSNP10	The previous {places4people) comment to add 'proportionate to the location and scale of the development' has been included in this policy. However this now needs criteria to define what that means, for example, a major development (ie over 10 dwellings), an application within flood zones 2 or 3 etc.

WSNP13	The area is protected by general countryside/farmland policies in the Local Plan, but there is no evidence to justify that it warrants any higher level of protection. The Scheduled Ancient Monument is protected by other policies.
WSNP14	This should follow LP Policy E16 which sets out the circumstances under which development would be acceptable.
WSNP17	A 'full viability assessment' is not appropriate here - the policy needs to explain what the viability issue should demonstrate. You could use wording based the Local Plan policy CM02 clause 2 'every reasonable attempt has been made to secure an alternative community use and the site is not viable for redevelopment to provide alternative community facilities'
Supporting text to WSNP18	The infrastructure requirements for all of the Strategic Sites were considered with all of the relevant bodies (as set out in the Infrastructure Delivery Plan). These were considered and agreed at the Local Plan Examination in Public.
WSNP19 and WSNP20	At this stage, the Council has not implemented CIL in addition to s106, as it would make development in most areas of the district unviable. Policy WSNP19 should be deleted as a Neighbourhood Plan cannot enforce the implementation of CIL. The range of Section 106 contributions has already been agreed through the Local Plan process.
Section 17	Reference should be made to the current planning application.
WSNP21	Last para - the planning application boundary extends beyond the local plan boundary. This was a matter discussed at the Local Plan Examination, and the Inspectors indicated that the exact boundary should be considered through the planning application process. This policy must align with the Local Plan policy.
WSNP22	This wasn't supported by the Inspectors at examination. It is a matter for detailed design.
CA1	It may not be appropriate to name individuals here. An 'Acknowledgements' section somewhere in the document could be considered to acknowledge the various contributors to the Neighbourhood Plan.

Westgate Neighbourhood Plan Comments on Draft Plan by Places4People for Thanet District Council September 2019

General

4. The quality of the draft document and inclusion of policies and community actions is to be commended. In the actual consultation document the Planning Policies and the Community Actions should be identified in distinctly different ways eg by use of different colour boxes.
5. Once adopted, Neighbourhood Plans ("made") become part of the development plan for the area and will be referenced and quoted in planning reports and planning appeal decisions. As such, it is helpful if Plans have a consistent approach to paragraph numbers throughout the document. It is therefore recommended that paragraph numbers, based on each chapter, are inserted into the document. For example, the paragraphs in Chapter 1 would be number 1.1, 1.2, 1.3 etc
6. The document refers to the ongoing campaign against the emerging Local Plan and, in particular, the allocation of 2,000 houses in the Neighbourhood Area. While such comments are understandable, they quickly become out-of-date and would not necessarily be appropriate for inclusion in the final document which, given the known timescales, is quite likely to be examined against the newly adopted Local Plan.
7. The draft Plan refers in places to what the Plan "will" do. Again, it is worth remembering that, to all intent and purpose, this is the Plan and it will save a lot of editing in the future if it is written in that tense.
8. Maps - Don't forget to include the OS copyright and licence number on all Ordnance Survey Maps used in the document. If not already done so, the Town Council will be eligible to sign up to the Ordnance Survey Public Sector Mapping Agreement which allows the use of maps for this purpose and will provide a licence number to be used.
9. While not a requirement, it can be helpful to users if a single Policies Map is included in the Plan (or, for more detailed areas, an Inset Map) that identifies the extent of all policies that relate to a geographic area, such as site allocations. This approach is used in local plans and helps to avoid any doubt in the interpretation of allocated sites.
10. The draft Plan refers in places to what the Plan "will" do. Again, it is worth remembering that, to all intent and purpose, this is the Plan and it will save a lot of editing in the future if it is written in that tense

Content Section 3

11. The Plan Should state when the Neighbourhood Area was designated.

Section 5

12. The last line of this section will have been superseded by the time that consultation commences. The paragraph should therefore be updated.

Section 6

13. Other than providing some context, it's not clear what this section is seeking to add to the Plan? As written, the section is carrying a lot of baggage that, as noted above, will soon become out-of-date. The Plan is also written as a lobbying document in Section 6.1, which it clearly is not and cannot function as such.

14. Given the concerns about the Local Plan, it might be appropriate for the Neighbourhood Plan to seek to provide more detail and guide the development of the site. This is something that Locality's Technical Support Programme could perhaps assist with. See, for example, the Kington Neighbourhood Plan in Herefordshire.

Section 7

15. This section is helpful to the reader unfamiliar with the area.

Section 8

16. The Vision and Objectives appear suitable and, while it's not essential it is always helpful as a background exercise, for the Neighbourhood Plan body to assess whether the policies in the Plan will deliver the objectives.

Section 9

17. Given the earlier comments about paragraph numbers, consideration could perhaps be given to breaking this section down into topic chapters, e.g. - Seafront, Town Centre, Heritage Assets, Natural Environment, Development and Design, and Infrastructure and Services

Policy WSNP1

18. There are a number of potential anomalies in the wording of the policy. It refers to East Zone and West Zone, but these zones do not appear to be defined on a map. It would therefore be difficult for a developer and/or planning officer dealing with an application to deal with applications without knowing to which area it applies. East zone has not been mapped

19. It also refers to "suitable" development. The use of such words can open decisions up to misinterpretation. It is recommended that the policy is tightened up to reduce opportunities for unintended consequences of policy.

Policy WSNP2 (Now WSNP3)

20. Consideration might be given as to what evidence is required by an applicant to demonstrate that a leisure or tourism attraction is no longer viable. The viability requirements in Policy WSNP7 might be appropriate here?

21. Should the title of the policy be amended to Safeguarding Leisure and Tourism Facilities to be in line with the wording in the policy?

Policy WSNP3 (Now WSNP4)

22. The requirement that all planning applications within the designated area need to include an impact assessment is unreasonably onerous, especially where the proposal is minimal. The insertion of "proportionate to the scale of the proposal" after "assessment" might be more appropriate.

23. Are the Westgate High Street and Lymington Road Shopping area the same as the designated areas on Map A? Words should be inserted in the policy along the lines of "...Westgate High Street and Lymington Road, as identified on the Policies Map..." so that users can be clear as to where the policy applies.

24. Are Classes D2, 81 and C3 included in the policy? The blue line on the document we have received currently doesn't encircle them.

25. The paragraph preceding Policy WSNP4 talks about WTC refusing change of use applications. As a reminder, Westgate Town Council are not the local planning authority and therefore do not have the powers to determine planning applications.

Policy WSNP4 (Now WSNP5)

26. In the first line it would be helpful to reference the Policies Map after "identified" so that users can see where the policy applies.

Section 9.4

27. The last part of the paragraph preceding Policy WSNP5 is within a blue box. Is this an error? It should be remembered that there will be aspects of development that are permitted under the General and Permitted Development Order and where consent is not required. Replacement doors and windows, for example, may not require consent unless Permitted Development Rights have been removed. The Neighbourhood Plan cannot remove these rights.

Policy WSNP5 (Now WSNP6)

28. We are assuming that the Conservation Area Action Group has no statutory powers in the planning process and that the "strict conservation policies" set by them have no statutory weight in the planning process? If that is the case, the NP presents an opportunity to include the strict conservation policies in the NP where they could be tested through consultation and examination

Figure 9-6

29. The map appears to indicate two areas within the Westgate-on-Sea Extension Conservation Area that are not in the designated area. It might help if the map shaded these areas with a notation to confirm that they are not within the Conservation Area?

Policy WSNP6

30. It would help the Plan user if the buildings identified in Appendix C were identified on a map.

31. Does the "initial" Local List have any status at this time? The preceding paragraphs refer to "potential listed building". Presumably this means local heritage assets?

Policy WSNP7 (Now WSNP17)

32. What is meant, in this instance, by the phrase "the allocation of Assets:...."? In planning policy terms, it would normally re-late to the identification of land or property as identified on the Policies Map. Is the meaning, in this instance "designation"?

Policy WSNP8 (Now WSNP11)

33. It' suggested that the policy is worded in the positive tense - "Sites listed in table 1 are designated as Local Green space. There is no need to specify the end date. They are designated until a more up-to-date Plan supersedes them.

34. The sites should be defined on the Policies Map and it would be helpful to the Examiner if a separate assessment were published to demonstrate how the proposed sites meet the NPPG LGS criteria.

Policy WSNP9 (Now WSNP12)

35. The Policy appears to repeat the requirements of Policy SP22 of the Submission version of the Local Plan. If this is the case, then it's probably not necessary to repeat the policy in the Neighbourhood Plan unless something locally specific to the Westgate Green Wedge is included and remains in general conformity with the Local Plan.

Policy WSNP10 (Now WSNP9)

36. Remember that ultimately the NP is a planning policy document for the local planning authority (Thanet). Therefore, while the Town Council is right to encourage low carbon materials, it is better to make the policy "authority neutral". Perhaps better to word the opening line of the policy thus: "Development that incorporates low carbon materials will be encouraged (supported?)"? The final sentence of the policy is not necessary given our previous comments about the Town Council's role in the decision-making process and the fact that all relevant policies in the adopted Development Plan will be considered when determining applications.

Paragraph 9.10

37. This section represents another section that will quickly be overtaken by events. The neighbourhood plan is not the place to air grievances against the development plan which the NP will ultimately become part of.

Policy WSPN11

38. Depending upon the outcome of the Local Plan Examination, this policy would appear to repeat Policy E18 of the draft Local Plan and is not necessary for the Neighbourhood Plan.

Policy WSNP11a

39. It is not clear why the policy number has an "a" attached?

40. The policy is not clear and also unenforceable. What is meant by "the next Local Plan Period"? The Neighbourhood Plan can only provide policies for the period that it covers (2031) and not dictate where development will for the next century. It is considered highly unlikely that the policy meets the Basic Conditions and would survive examination. It might be appropriate to convert the policy intent to a Community Action?

Policy WSPN12 (Now WSNP15)

41. Unless protected by legislation (TPO's or trees in a conservation area) consent is not required for the supporting text should reflect this.

42. The wording "new large planning application" is potentially ambiguous. Major planning applications are defined as, for example, 10 dwellings or more. Is this the scale of development that the policy is aimed at?

43. Would you prefer to see native species planted rather than those that support "local distinctiveness"?

Policy WSNP13 (Now WSNP2)

44. Again, amend reference to the Town Council. In this case we suggest reference to the Town Council is removed. Would there be instances where, in exceptional circumstances, it would be appropriate to disregard the guidelines in favour of the wider benefit of a proposal? This is particularly the case as they are "guidelines" and not requirements.

Paragraph 9.13

45. This section will need updating in due course to reflect the outcome of the Local Plan examination.

Policy WSNP14

46. Again, reference to what the Town Council will support is not appropriate in the policy. Much of the content of the policy is a repeat of other policies and is therefore not necessary.

Para 9.14

47. In the final consultation document, it is recommended that the Design Guidelines (A and B) are distinct in format from normal Plan text so that it is clear to the user what the Guidelines are.

Policy WSNP15 (Now WSNP10)

48. The policy places an inappropriate burden on minor planning applications by inferring that all applications must be accompanied by a full flood risk assessment. It is recommended that the flood risk assessment should be proportionate to the location and scale of the development.

49. Again, reference to what the Town Council will support is not appropriate in the policy.

50. Believe that "important" species should in fact be "protected" species?

Policy WSNP17 (Now WSNP22)

51. Again, reference to what the Town Council will support is not appropriate in the policy.

52. There could be a potential discrepancy in how "reasonable spacing" might be interpreted by decision makers. Is this really about ensuring all proposals, and not just new housing proposals, do not have a detrimental impact on residential amenity?

Policy WSNP18 (now WSNP8)

53. Again, reference to what the Town Council will support is not appropriate in the policy.

54. The policy is effectively repeating Policy SP34 of the draft Local Plan and is therefore not necessary in the NP.

Policy WSNP19 (Now WSP18)

55. Again, reference to what the Town Council will support is not appropriate in the policy.

56. The policy is effectively repeating Policy SP34 of the draft Local Plan and is therefore not necessary in the NP.

Policy WSNP20 (Now SWP19)

57. The charges for the Community Infrastructure Levy are a separate charge that is calculated based upon the adopted Charging Schedule. It is not necessary for planning applications to state what the levy will be. Suggest that the Policy is deleted.

Policy WSNP21 (Now WSP20)

58. The regulations concerning what is appropriate to be collected from Section 106 agreements is tightly constrained. Planning obligations for the provision of infrastructure should be: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development (NPPF Para 56).

Community Actions

59. We have not assessed the Community Actions as they are not planning policies. However, they should be clearly differentiated in the Plan from Planning Policies.

60. In respect of Community Action and its supporting text, be aware that the most recently adopted development plan document is the "current" plan for the determination of planning applications. Therefore, if a new NP is produced ahead of the next Local Plan, it will be examined against the adopted Local Plan but will be superseded by the new Local Plan, once adopted.

61. The Government currently require local plans to be reviewed every five years. While it is their decision, it is therefore very unlikely that the District Council will wait until the end of the next decade until it puts in place a new Local Plan. To do so could open the District to speculative development proposals.

Response from The Coal Authority



200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG184RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

For the Attention of: Gill Gray
Kent County Council

[By Email: admin@westgateonsea.gov.uk]

22 October 2021

Dear Gill Gray

~~Westgate Neighbourhood Plan~~ Regulation 14 (Pre-Submission)

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on it.

Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.

Yours sincerely

Christopher Telford BSc(Hons) DipTP MRTPI
Principal Development Manager

Protecting the public and the environment in mining areas

Response from Millwood Designer Homes Ltd



11 November 2021

Westgate Town Council
78 St Mildreds Road
Westgate on Sea
Kent
CT8 8RF

Sent by email to townclerk@westgateonseas.gov.uk

Dear Sir/Madam,

Westgate Neighbourhood Plan Regulation 14 Consultation Representation on behalf of Millwood Designer Homes Ltd

As you are aware, we act on behalf of Millwood Homes Designer Homes (MDH) and write to provide representations on Regulation 14 of the pre-submission Westgate Neighbourhood Plan dated September 2021. These representations are supported by Quex.

The comments should be read in conjunction with the submitted representation form via the online survey.

Overview

As you are of course aware, Millwood Homes have submitted a hybrid application on land at Westgate on Sea for the provision of up to 2000 dwellings, a care home, two form primary school, health facility a mixed used centre; and a full application for phase 1 to provide 120 residential dwellings, in line with Policy SP17 of the adopted Local Plan (Ref: 0L/TH/20/1400). The application is known as 'The Gallops'.

The application seeks to deliver the same number of dwellings but on a larger area than that defined by the Local Plan, in order to significantly increase the amount of greenspace and allow for variation in density, neither of which are possible to achieve in the allocated area, and to minimise the area of the development that abuts existing homes.

Millwood Homes has worked proactively with Thanet District Council prior to submitting the application and consider that the submitted scheme will make effective use of a strategic allocation and help to meet a significant need for residential accommodation in Thanet.

The proposed development has been strongly shaped by the established site features, and the opportunities to take advantage of long-range views towards local landmarks. The landscape led masterplan is underpinned by an integrated network of green spaces which set a framework for well-designed dwellings and spaces. It will provide a pedestrian friendly, permeable layout that will encourage walking and cycling and use of public transport as defined within the NPPF.

In general, it is disappointing that the document wording is clearly unsupportive of the Local Plan, and specifically of the allocation at SP17 particularly in light of the requirement for Neighbourhood Plans to be prepared positively.

It is important to recognise that contrary to the Plan text, Westgate Town Council (WTC) and the community have been able to submit representations to the Local Plan. It is incorrect to say that WTC "have had no say over the strategic allocation". Representations were submitted, and although the Local Plan and allocation were not deleted or reduced, this does not mean the Town Council had 'no say'. These references should be deleted.

However, the Neighbourhood Plan does rightly recognise that the Local Plan is adopted, as is the allocation for 2000 homes, and therefore the Neighbourhood Plan should seek to make positive policies which will help deliver the highest quality development. This is welcomed.

As you are aware, Millwood have worked for many years to demonstrate their commitment to securing such a development, in fulfilling the Local Plan allocation.

Representations

No comments are offered on the themes of Economy, Sustainability, Biodiversity or Facilities, nor the section of Community Actions.

However, the following comments are offered on the themes below:

Theme 1- Design

The policy requires adherence to the 'general design guidelines' set out in 10.2.

We raise two points:

1. Part of 10.2 requires that the 'density of new development should be in keeping with the 'Character Area'. As Character Area is capitalised this should refer to a previously defined Character Area earlier in the document. These should either be defined, or worded to allow for individual assessment.

We suggest this is amended to read "the density of new development should be in keeping with the character of the area"

2. A further element of 10.2 states that "Development should not impact on surrounding properties" This should be slightly reworded, as all development will impact to some degree on surrounding properties by its simple existence. To requirement no impact at all is not appropriate.

We suggest this is amended to read "Development should not adversely impact on surrounding properties"

Theme 3 - Heritage

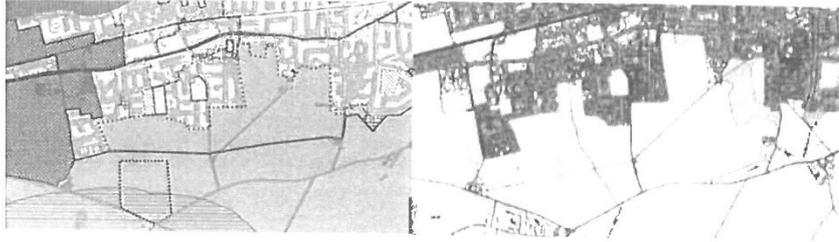
Policy WSNP8 states that the WTC will not support applications that *disturb* scheduled ancient monuments *and their setting* (emphasis added). Whilst we understand the purpose, the policy should be amended as 'disturbing' the setting is not the correct application of national and strategic policy.

We suggest it should be reworded to state "WTC will not support applications that adversely affect the integrity or setting of Scheduled Monuments disturb schedule ancient monuments and their setting" (although this will then be a direct replication of Local Plan policy and unnecessary on this basis.

Theme 5 - Green and Open Spaces

We note the aspirations behind the Westgate Countryside Triangle (WSNP13). However, WTC will be aware that the application site at the Gallops is purposefully defined to move development away from the northern boundary with the existing homes in order to minimise the number of homes directly affected. As such, it varies from the allocated site boundary, for the betterment of the community.

Comparison between the Local Plan Allocation and the Application red line



In doing so, the application relocates that area of development further to the south, to the western side of Minster Road. This area lies within the proposed Triangle.

Proposed Countryside Triangle



We suggest the Triangle is redefined to exclude the area which overlaps with the application site.

However, as noted in the NP, the area is active farmland, and there is no intention for it to be used in any different manner. Indeed it provides important crops for wintering birds (and will continue to do so following development of the Gallops site). It is not an area of countryside 'open space' (aside from the footpath which runs through it). This description should be amended.

In any event, the policy wording should be amended to reflect the correct figure number.

WSNP14 relates to Best and Most Versatile Agricultural Land. This policy replicates that in the Local Plan (E16) but without the important criteria against which exceptions can be assessed. This does not confirm with the strategic policies of the Plan and will not therefore pass the Basic Conditions. It should be removed, or amended to reflect the wording in the Local Plan.

Theme 8 - New Housing Development

It is not clear why this is worded as a Policy Statement - this should be clarified.

The policies seek to replicate that set out in the policies in the main document. However, there are two points which should be amended:

1. The statement states "the Town Council will only support development with a strict 30% affordable housing quote as a minimum" This is contrast to the strategic policies of the Local Plan and will fail the Basic Conditions. It must allow for viability testing as per policy SP23 of the Local Plan.

We suggest it is amended to read "the town council will only support development with a strict 30% affordable housing rate as a minimum (subject to viability testing)"

2. The Statement reads "...houses should not extend beyond the boundary proposed in the Local Plan..." For the reason above, MDH are proposing to extend beyond the boundary in order to deliver the same number of homes over a wider area, leading to a greener and more appropriate range of densities.

Although the Neighbourhood Plan can not change the boundary of the allocation, we would suggest this sentence is removed. In any event, even if WTC do not accept the argument for the larger site, this wording is unnecessary as a direct replication of Local Plan policy which restricts development in the countryside.

Policy WSNP22 relates to where the proposal will abut existing homes. It would be helpful for the policy or supportive text to define what is meant by 'open aspects' in order to provide some certainty.

We hope these comments are helpful in the preparation of the Regulation 16 Version of the NP and we welcome further discussion. Further representations may be submitted at that time.

Kind regards

Yours Sincerely

Anna Gillings
Managing Director

anna@gillingsplanning.co.uk