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BY EMAIL ONLY

30 November 2021

Dear Gill,

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

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.

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.

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

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

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.

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 bookstock 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 it's 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.

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.

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.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Stephanie Holt-Castle'.

Stephanie Holt-Castle
Director for Growth and Communities