

Response by Westgate-on-Sea Town Council on The Draft Thanet Local Plan. March 2017

Background

In June 2015 the Westgate-on-Sea Town Council's Planning, Environment and Highways Committee gave consideration to the Conclusions of the WWRA representation (dated 4th March 2015) to Thanet District Council (TDC) on the then 2015 Draft Local Plan.

- i. **The level of housing growth** The level of housing growth incorporated in the Local Plan should be a bottom-up approach related to objective, evidence based need;*
- ii. **A lack of adequate evidence on the future robustness sustainability and soundness of the proposals** The Current 2015 Draft Local Plan lacks crucial evidence which calls into question the future robustness and soundness of the proposals both in terms of process and content*
- iii. **The level of proposed housing proposed in the 2015 Draft Local Plan** The level of proposed housing proposed in the Draft Local Plan is based on optimism in preference to an evidence based jobs led approach;*
- iv. **The loss of significant tracts of Grade 1 agricultural land** The loss of significant tracts of Grade 1 agricultural land proposed in the Draft Local Plan is unacceptable. Loss of any Grade 1 land should only be contemplated as a matter of absolute last resort rather than used in fostering optimism*
- v. **The Proposed allocations ST1 and ST2** The Proposed allocations ST1 and ST2 in the Draft Local Plan are not proportionate to the existing built form and local services and should be withdrawn*
- vi. **The absence of a fully costed implementation programme and examination of Infrastructure** In the absence of a fully costed implementation programme and open book funding plan, the Draft Local Plan is considered to undeliverable in the manner proposed*
- vii. **The future of Manston** the Local Plan should be suspended until such time as the future of Manston is determined and the 'in combination' effects are known, understood and incorporated;*
- viii. **The inadequate consultation process** In order to demonstrate the probity of the consultation process allied to fostering confidence, the Local Plan should be redrawn to reflect the representations made and take on board the views of the community*
- ix. **The amount of new development in the early stages of the Plan Period** In the event that the Local Plan continues in process a lower housing requirement should be adopted for the first years of the plan with the number only being stepped up in later years—to enable people to keep an eye on the plan; and*
- x. **The Local Plan and associated consultation process has been complex and confusing** The Local Plan and associated consultation process has been felt to be overly complex and confusing (see the DCLG Committee expectations on this process) and needs be reviewed going forward to be more user friendly to all sections of the community.*

The Town Council subsequently agreed that:

- Westgate-on-Sea Town Council adopt the above conclusions as the Policy of the Town Council toward the Draft Local Plan, published by Thanet District Council in January 2015.*
- Westgate-on-Sea Town Council formally asks Thanet District Council to take note of the policy of Westgate-on-Sea Town Council in reviewing the Draft Thanet Local Plan.*

Subsequent 'Progress' on the New 2017 Draft Local Plan

Although it was expected to be produced in late 2015 the latest revision to the Draft Local Plan did not appear until December 2016-perhaps because of the considerable adverse public reaction at TDC's 2015 Consultation.

Collective working with other East Kent Authorities

Although there is a duty to co-operate this seems to have been more honoured in the breach than observance. This was a point made in several submissions to TDC two years ago but seems to have been completely ignored. Currently, each District can produce plans pretty much without reference to what else is going on in the region, and possibly follow central government guidance without regard to local realities, a problem which the recent White Paper on Housing acknowledges as it is rethinking 'methodology' by April 2018.

Summary of commentaries on the 2017 draft local plan

i. The methodology for housing growth for Thanet(-The Objective Assumptions of Housing Need (O.H.A.N)

This has been produced by TDC's Consultants and is based on statistical projections from the Office of National Statistics, however it does not explicitly take into account the uniqueness of Thanet. This methodology is a one size fits all methodology and we suggest the housing allocation should also take into account the levels of deprivation, lack of jobs and amenities in the area rather than simply using a mathematical population projection. Particularly it is considered that the level of proposed housing provision in the Draft Local Plan is not balanced with employment prospects or proposal.

We are very concerned that the housing numbers or OAN is now over 17000 houses. This creates more issues than previously as the numbers have increased significantly from the 12000 in the last draft. The pressure to develop on greenfield land is higher and there is higher demand on Highways, Water and essential services. But more importantly, Thanet has not built the volume of 857 dwellings per annum certainly in the past 20 years. Regrettably the Council's AMR (annual monitoring report) has not been provided to show current housing delivery. The publication of 2016's report during the consultation period would have allowed the public to understand the true delivery of housing in Thanet, especially in light of the new housing delivery of 857 houses a year.

To his credit the Leader of Thanet Council addressed the Westgate Town Council Residents meeting on 4th March 2017 and in answer to a question from the public declared that the Housing Proposals in the current Local Plan are "well over twice the likely level of growth".

The Planning Advisory Service in 2016 published "Planning on the Doorstep: The Big Issues – Population" and extracts are presented here:

"Foreword :-The population continues to be a huge issue for councils and communities across the country; an issue that councillors face regularly on the doorsteps of their electorate. This advice note looks at how population projections are formulated and used, exploring how they are a vital evidence base for the formulation of planning and other work that the council does across a wide range of services"

SUMMARY EXTRACTS FROM Planning on the Doorstep: The Big Issues – Population

Relationship between demographic and employment projections It is important to ensure joined up thinking between the population needed to provide for the existing and future population and the employment strategy and objectives being pursued. Comparing official population projections with economic projections which identify the population required to support different jobs led scenarios is useful and ensures that the economic objectives of your authority are consistent with the population projections or at least compared on a consistent basis. There are clear links with the duty to cooperate and particularly how growth strategies fit with the LEP objectives which are currently being developed. Specifically there needs to be joint working to understand whether these LEP objectives are realistic and fit with the reality of the population structure and local economy of your authority. The LEP and County Councils are a statutory body for the duty to cooperate and local authorities are obliged to work with them to develop consistent and coherent strategies and growth targets which are deliverable.

Testing assumptions Population projections are the starting point for planning for a whole range of strategies including setting your employment and housing provision. Providing housing is one of the most important aspects of the local plan and is certainly the most contentious. You are now responsible for identifying your objectively assessed need for housing and setting your housing provision using evidence. This process is being rigorously scrutinised by communities, developers and Inspectors at examination. The population and household figures, and the assumptions sitting behind them are a key area of challenge which must be rigorously justified. An example of how assumptions are being tested is demonstrated in South Worcestershire, **where the Core Strategy Inspector has provided very detailed comments on the methodology, challenging the robustness of some assumptions.** These include the economic growth assumptions and assumptions on the economically active older population participation rates. The Council are now undertaking further work to address his comments.

Summary Population is a key issue which needs to be understood for your area and settlements. Projections are a valuable starting point and can to some extent be adjusted according to local circumstances and evidence. They can also play an important role throughout the local authority and with wider organisations and service providers to inform decision making and ensure this is done on a consistent basis, using the same evidence base.

Commentary

Notably the “objective forecasts “of future population do not include any consideration of any scenarios other than the absolute maximum scenarios to assess the likely local variation of Thanet’s Local and imported populations. Moreover there is no evidence of

- *joined up thinking between the population needed to provide for the existing and future population and the employment strategy and objectives being pursued*
- *joint working with other Authorities to understand whether these LEP objectives are realistic and fit with the reality of the population structure and local economy of your authority*
- *the robustness of assumptions sitting behind population and household figures.*

ii. The proposed number of people per household

If we divide the number of people projected to come to Thanet over the next 20 years (27.5k) by the

number of houses planned (17,100) we have a ratio of people to households of 1.6, in other words only 1.6 people are predicted to live on average in each property. We suggest that this ratio is much too low.

If we have a ratio of 2.5, the objectively assessed housing need would be calculated at approximately 11000 households which would possibly be more acceptable to the general public. At just 2 people per household this would give us just 14000 houses.

Otterpool Park (see below) a recently approved new development outside Folkestone includes proposals for 12000 houses for increase of 29000 in the population which shows a ratio of 2.4 persons per household.

OTTERPOOL PARK: A GARDEN TOWN OF THE FUTURE(near FOLKESTONE)

In November 2016 The government gave the go ahead for Otterpool Park – a 12,000 house garden town – to be built near Folkestone.

As part of the plans to speed up house building across the country, housing minister Gavin Barwell has confirmed Shepway District Council's plan will be backed by the government.

Shepway council, with its land owner partner is preparing a proposal for up to 12,000 new homes and employment land close to Junction 11 of the M20 to accommodate up to 29000 population, which will help to meet the long term future housing and jobs needs in the district. The affordable, high quality housing and the development of a sustainable local economy matches the priorities of Shepway council's corporate plan.

The new community will have a focus on sustainability, cutting edge technology, quality design, accessible green space and high quality public realm that reflect the principles of the garden city movement. The proximity of the M20 and Westenhanger Station means the area is already well connected, not only with the rest of the district but also with the capital, Eurotunnel and the Port of Dover.

The existing community around the Otterpool site will have better access to services, as well as benefitting from new infrastructure such as new sewerage and roads. There will also be more job opportunities in the local area as a result of the development.

Commentary

Two questions have been raised:

- 1. as to whether the proposed number of houses have been increased in the current revised plan to fund the proposed new road system which could not otherwise be funded by Kent CC as the Strategic Highway Authority.*
- 2. Why the house occupancy in Otterpool is so radically different from the Projected Occupancies in Thanet's Local Plan?*

iii. The impact of BREXIT on the housing number

As the arrangements for BREXIT become clearer there is likely to be a decrease in the number of people allowed into Britain from European countries, therefore the calculated OAHN is inaccurate and over inflated. Looking at the historical ONS figures, approximately 200 people per year come to

Thanet that are classed as “international migration”. Likely a high percentage of these are European. If we suggest that 80% are from Europe this is approximately 160 people per year. If Brexit halves immigration from Europe then would reduce the European immigration to Thanet to 80 people per year, which over 20 years is 1600 people. Using the ratio of 1.6 per household, this equates to 1000 house or units.

We propose that 1000 houses should be removed from the allocations on agricultural land in Westgate-on-Sea based on this clear reasoning.

It has been suggested that if housing numbers were reduced they would not be taken off of the “Strategic Housing sites” on the agricultural land. We believe that the housing on the agricultural land should be removed first and foremost as the NPPF states that the best and most versatile land should be only be used as a last resort.

iv. The Proposed allocations ST1 and ST2

The Proposed allocations ST1 and ST2 in the Draft Local Plan are not proportionate to the existing built form and local services and should be withdrawn. Moreover it is now clear that the designation of the proposals may have been to provide contributions towards a new highway Route. The “Inner Circuit” requires development contributions which will not and, at the current time, cannot be financed by KCC - the strategic highway Authority.

Also , whilst outside Westgate-on-Sea, but within allocated site ST2 is the Dent-de-Lion medieval gatehouse. This monument is scheduled under the Ancient Monuments and Archaeological Areas Act 1979 as amended as it appears to the Secretary of State to be of national importance. Government advice is that “All Scheduled Monuments are considered to be of national significance and are to be of material consideration when planning.” Dent De Lion is both a scheduled monument and “The Gate House” is Grade II Listed.

The Town Council therefore proposes that (see also commentaries that follow in section xi “Local Green Space” regarding separation of village and town boundaries) to develop on the land between Garlinge and Westgate should be resisted at all costs as it would have a seriously detrimental and adverse impact on the setting of a site containing a Scheduled Monument which has, to date, enjoyed an open, undeveloped aspect to the South.

v. The loss of significant tracts of Grade 1 agricultural land

Building on grade one and grade two agricultural land, or any agricultural land, is unacceptable. This is more so now than ever before. The Food and Agricultural Organisation for the United Nations (FAO) explains:

The Food and Agricultural Organisation for the United Nations FAO, 2017.

“ to provide for a (predicted worldwide) population of 9.7 billion in 2050, food production will need to increase from the current 8.4 billion tonnes to almost 13.5 billion tonnes a year”.

“Eighty percent of the additional (food) required to meet demand in 2050 will need to come from land already under cultivation.”

This explains that we will need much more food in the future and therefore building on our top quality farmland is a very short sighted method of planning for housing. We will need to preserve our agricultural land and make it even more productive than it already is. This shows how ludicrous it is to build on this land under cultivation in Thanet.

We are totally against the building of houses on agricultural land as are many others in Thanet and the UK. We need to value and protect our precious commodity. As building on the soil will cause irreversible destruction of the farmland, when it is gone, it will be gone forever.

Trevor Mansfield of the UK Soil Association has written:

“We believe that high quality agricultural land should be preserved for growing and protected from development both now and in the future. Good quality agricultural land is invaluable - It is the fundamental resource on which human life depends and protecting and improving the health of our soil is more important today than it ever has been. In the UK it’s estimated that we lose 2 million tonnes of soil a year through erosion (see Defra’s 2009 Safeguarding Our Soils); yet it can take more than 500 years to generate an inch of soil.

Soil stores 10 times more carbon than the forests. Climate change will bring even greater challenges in the future, with increased pressure due to waterlogging and drying, affecting the productive capacity of soils”.

He points out that soil is the resource on which life depends and so protecting it is vitally important. He goes on to explain that it can take almost half a century to produce an inch of soil. How sad it would be to see our soils destroyed as if they were of no value, which is exactly what this council is proposing.

Global Warming is a real issue that will affect us all. It is being caused by ever increasing amounts of carbon dioxide and other greenhouse gases in our atmosphere. Soils store large amounts of carbon and help with balancing our carbon cycle. Also, they assist with flood mitigation and it is clear that if we keep concreting over areas that were previously assisting water drainage, we will end up exacerbating floods, which will also increase with global warming. Not only is this dangerous and devastating to those affected, but the contribution of damaged soils to flooding events in the UK is estimated to be £233 million per year, with the total annual cost of flooding estimated to be £1 billion (POSTnote 484 in POST, 2015).

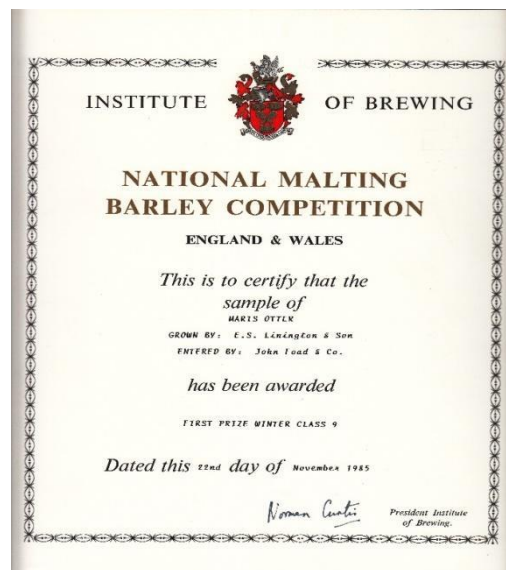
The Parliamentary Office of Science and Technology carried out research into the importance of soils in the UK and concluded:

“Around 95% of food production relies on soil. The global nature of the food system makes soil health (or quality) an international concern. Soils filter and store water, support agriculture and other plant and animal communities, and harbour a quarter of the world’s biodiversity”.

This investigation clearly states that soil quality is an international concern. How much more concerning is the destruction of soil due to the construction of housing estates. Not only do soils have a multifunctional purpose, but they also harbour a quarter of the world's biodiversity.

The land at ST1 and ST2 in Westgate-on-Sea is grade 1 agricultural land and it has also had award winning crops grown on it as evidenced by a certificate received last year and copied below.

We consider that building on this land should never even be contemplated. People might question the sanity of those who thought this was a good idea whilst conducting the SHMA a few years ago, including Quex Estates themselves. The Linnington family has lovingly fertilized and nourished the soil, keeping the soil from eroding and decreasing in fertility, which has been the fate of many other soils across the world; Over half the world's agricultural land is subject to soil erosion (POST, 2015).



Destroying the soil now would undo all their hard work to sustain this precious resource.

The National Planning Policy Framework itself admits that the best and most versatile land (Grade 1-3 soils) "is the land which is most flexible, productive and efficient in response to inputs and which can best deliver food and non-food crops for future generations". Protecting soil presents an opportunity to address simultaneously several global challenges such as food security, climate change, water security, waste management and biodiversity loss (POST, 2015).

Because most of the existing roads in the Thanet Council/KCC proposals for a new "Inner Circuit" of highway improvements are well below modern standards, extensive acquisition of high quality agricultural land to widen the roads and provide associated major junctions in the network would require substantial extra land take of greenfields, mainly grade one agricultural land together with disrupted land drainage of any remaining fields which is also considered to be unacceptable because of its impact upon good agricultural assets .

Thanet District Council needs to remove the allocation of large areas of grade 1/2 agricultural land from their Draft Local Plan for housing in Thanet. We must protect and value this finite resource and build only the very smallest number of houses on the land. We need it for growing food in a world of ever increasing population and demand on food supplies as explained by the FAO and for mitigation against climate change as explained by Trevor Mansfield of the UK Soils Association. We urge the council to reconsider using agricultural land for its strategic sites in the proposed Local Plan and reduce the thousands of houses allocated for farmland to just a few hundred at most, if exceptionally

necessary.

vi. The loss of significant open spaces and associated birds and wildlife undermining the sustainability section of the NPPF.

The in combination effect of such a large housing allocation in Thanet will impact the birds and wildlife of the area significantly.

We feel that the Local Plan does not meet the criteria in the sustainability section of the NPPF.

vii. The future of Manston

The Local Plan should be suspended until such time as the future of Manston is determined and the 'in combination' effects are known, understood and incorporated. There is still question over the future of Manston and the plan should include options that include and exclude the Airport site. Until the issue of Manston Airport is resolved the plans should be on hold.

Our Local MP Sir Roger Gale has suggested

- Manston Airport is a vital piece of national infrastructure that, once lost, can never be re-invented.
- There is a firm proposal on the table to acquire and re-open the airport through a Development Consent Order. This process is under way and it would be wrong to re-designate the airfield for alternative use in an attempt to frustrate this proposal.
- Manston Airport is needed now for post-Brexit freight cargo, (there is insufficient capacity to meet the anticipated growth in the South East), for aviation-related industries and for passenger traffic in the future. The job-creation potential of the airport and ancillary and supporting businesses is very considerable.
- The Local Plan already contains adequate provision for housing and a surplus of land zoned for future industrial use. There are many unused industrial sites available and Discovery Park at Sandwich still has considerable available capacity.
- The alternative proposals for housing on the airport site contained in the Draft Local Plan would have severe Environmental consequences (the site is above a major aquifer and Thanet is already short of water) and the proposals to meet infrastructure (road, healthcare, education etc.) needs are inadequate.

It is considered that none of these very important questions have been adequately addressed or answered in the current Draft Local Plan.

viii. The Local Plan and associated consultation process has been complex and confusing. The Current consultation process has been inadequate

The original 2015 Local Plan and associated consultation process was felt to be overly complex and confusing (see the DCLG Committee expectations on this process) and has not been reviewed or improved for the current 2017 Consultation and also has not been properly user friendly to all sections of the community despite the published intentions of Thanet Council. As a result the current round of Consultation because of its limited and poor publicity, constrained nature and sheer overload of information has not been acceptable or fit for purpose.

There was disappointment that Thanet District Council has decided that the transport plan for the

Thanet Area and its consultation will not be in the same time frame as the local plan consultation. As Transport is at the heart of the Draft Local Plan we cannot see how there can be informed consultation if the Public cannot understand the implications of housing and highways and how they fit together. Planning Officers have stated that time is of priority and “we are late in getting the local plan implemented.”

We argue that it will be 2 years since the last consultation and many questions were raised at that time on highways and are still unanswered, and the reaction analysis and lack of adequate response to that Consultation have not been acceptable or satisfactory. Elsewhere in Kent, in Maidstone, Local Traffic Plan preparation has been in step with Local Plan preparation –so much so that Kent County Council have objected to a number of strategic proposals because of forecast impact of traffic generation.

*For these reasons the new Draft Local Plan Proposals and the previous 2015 proposals have to be deferred until such time as information on roads and highways and traffic impact are available. We are concerned that the time it is taking to get this information together raises serious doubts on the whole viability and deliverability of the Draft Local Plan and suggests that the Draft Local Plan has to be delayed until after the transport plan and its consultation has been completed – the two Consultations are integral to each other and **should and could have been concurrent.***

Secondly, the consultation time was simply not long enough. With the last consultation being 8 weeks, there was little time to fully research the information required. One of the most important consultees Natural England, takes 6 weeks to respond on any queries raised to them. Planning Officers should have aware of that constraint which the consultation did not allow for this to happen. Also it is to be noted that the members of Overview and Scrutiny (on the meeting on the 21st November 2016), there was concern on the amount of time to review the material presented to them. We feel that that the public were deliberately overwhelmed by the 6 week timeframe and that the whole set of proposals especially the Population Forecasts were presented as inevitable to overwhelm and confuse the public.

In particular a leaflet produced by TDC and circulated during the consultation process, and quoted by Councillors has the statement:

“about 7,800 homes either already built with planning permission, empty homes or windfalls” -the draft plan only needs to find 9,300 additional homes

This is felt to be particularly misleading and liable to be misunderstood as less than 1000 houses have currently been actually started!

Moreover the state of the current proposed revisions are so cumbersome –extending into over 600 pages of reports tables and associated references - taken together with the confusing, related, Consultations that are anticipated especially for the new Strategic Highway proposals are unacceptable.

In order to demonstrate the probity of the consultation process allied to fostering confidence, the Local Plan should be withdrawn comprehensively reconsidered and redrafted to reflect the representations made and take on board the views of the community, especially as the housing numbers have changed inordinately since the 2013 consultation and the 2015 draft local plan.

Many people (thousands) participated in the local plan consultation in 2015, and not so many in 2013 (just 150). It seems the local plan is gathering weight with concern. Looking at many

comments from the last consultation many people in Thanet are very concerned on the future plan of housing in Thanet. The local plan and along with the issue of the airport, it appeared from the electioneering last year that these items are what people voted on.

Thanet Council published a press release on the current Consultation (on March 8th 2017) "**349 members of the public attended a series of 8 public engagement sessions showcasing revisions to Thanet District Council's Draft Local Plan.**" On 4th March during that same Consultation Period Westgate Town Council organised a 2 hour meeting for Residents to discuss the start of a Neighbourhood Plan for Westgate-on-Sea (population 5500) and had to turn away some latecomers having attracted 250 Residents to a Meeting in Westgate-on-Sea's Pavilion.

Thanet Council were extremely disturbed by the public protest at the 2015 Consultation and deliberately refused to hold any public meetings at which Members of Thanet Council could be held to account during 2017. To his credit the Leader of Thanet Council addressed the Westgate Town Council Residents meeting, called to launch Westgate's Neighbourhood Plan, and in answer to a question from the public declared that the Housing Proposals in the current Local Plan are "well over twice the likely level of growth".

ix. The initial Strategic consultation in 2013 which fed into the 2015 draft local and is the basis for the 2017 local plan is out of date.

In 2013 the participants of the initial consultation were asked to think about 7 thousand houses for Thanet. Four years on, the OAHN has been calculated as 17,100 houses, meaning that this initial consultation for the housing allocation is now irrelevant as the figures have changed so much. There therefore has been no proper consolation for the housing figure of 17,100.

People attending a consultation regarding 17,100 houses, if one took place a few years ago before allocation were made, may have suggested that a new town should be built rather than the individual allocations bolt onto to existing towns. This could have saved large areas of agricultural land and also the distress caused by the adhoc bolt on allocations to towns and villages. Such a new town could have been competently planned with its own infrastructure and services and not added pressure to the existing individual towns. (see reference in Page 4 to Otterpool).

x. New Strategic Routes Policy

At first TDC had hoped that Thanet could receive South East LEP monies to fund the new proposed road system. It has been suggested that the number of new houses and their locations has been increased in order to finance new "Inner Circuit" of highway improvements. Because of the extent of the highway provision proposed, the bulk of potential developer contributions potentially available to public Authorities will be required to fund these roads.

Despite the expectations that more consultations are envisaged based on the highways and infrastructure before the finalisation of the Draft Plan it is clear that KCC strategic highway Authority have no evidence to support the proposed "Inner Circuit".

As stated above we are concerned that the time it is taking to get the KCC Consultation on Highway matters together raises serious doubts on the whole viability and deliverability of the Draft Local Plan and suggests that the Draft Local Plan has to be delayed until after the transport plan and its consultation has been completed – the two Consultations are integral to each other and should have been concurrent.

xi. Local Green Space- designation

If, and only if, all other options have been exhausted should we even begin to consider how careful use of some greenfield sites might be landscaped into use. In respect of ST1 and 2 it is felt that the remainder of the greenfield agricultural land between the sites and Shottendane Road must be retained and preserved in agricultural use as a green wedge for Westgate.

The key areas of green open space within Westgate-on-Sea are :-

<i>Recreation Ground</i>	<i>Lymington Road, Westgate-on-Sea, CT8 8ER</i>
<i>Community Green/Community Centre</i>	<i>Lymington Road, Westgate-on-Sea, CT8 8ER</i>
<i>Open Space</i>	<i>Victoria Avenue, Westgate-on-Sea CT8 8BJ</i>
<i>Open Space</i>	<i>Adrian Square, Westgate-on-Sea CT8 8TE</i>
<i>Open Space</i>	<i>Ethelbert Square, Westgate-on-Sea, CT8 8SR</i>
<i>Esplanade (Esplanade Gardens)</i>	<i>Sea Road, Westgate-on-Sea</i>

Westgate-on-Sea Town Council would like to include the above areas of open space for specific designation and protection through the Draft Local Plan.

X11 Infrastructure considerations

There has never been an adequate analysis of the impact of new development proposals on the infrastructure (highways, water, welfare, education and social) to demonstrate the designation of any of the proposed housing areas. Moreover, the infrastructure delivery plan that was originally promised for 2015 is even now still in an embryonic stage with no proper costings for the majority necessary improvements to ensure that infrastructure will keep pace with developments.

This is aggravated by the phasing, or lack of proper phasing, of new developments in a structured manner that would guarantee the delivery of adequate infrastructure to support development. The sequence of proposed development set out in Appendix B of the Preferred Options Report whilst possibly very attractive to potential developers /builders who have offered up sites for development or for sale, is unlikely to lead to developer funding sufficient and at the appropriate time in the future to deal with the increased traffic and social activity and the need for new or enhanced neighbourhood facilities. The outcome of the lack of a proper realistic implementation policy would mean by the end of the plan period there could be no mitigation of the problems caused by the growth and addition the potential 17000 households to an already over-crowded and stretched and in instances neglected infrastructure that we have in Thanet

In the absence of a fully costed implementation programme and open book funding plan, the Draft Local Plan is considered to be totally unrealistic and undeliverable in the manner proposed

xii. The amount of new development in the early stages of the Plan Period

The sequence of proposed development set out in Appendix B of the Preferred Options Report whilst attractive to potential developers /builders who have offered up sites for development or for sale, is

unlikely to lead to developer funding sufficient and at the appropriate time in the future to deal with the increased traffic activity and the need for new or enhanced neighbourhood facilities

In the event that the Local Plan continues in process a lower housing requirement should be adopted for the first years of the plan with the number only being stepped up in later years—to enable people to “keep an eye on the plan”.

On Monday 5th March Westgate-on-Sea Town Council endorsed the above commentaries contained therein for submission to Thanet District Council as the views of Westgate-on-Sea Town Council and the Local People of Westgate-on-Sea .