

# Westgate-on-sea Town Council. Response to the masterplan application for 2000 homes on Land south of Westgate and Garlinge

## Introduction

The Westgate on sea Town Council (WoSTC) has responded to the local plan consultation regarding this allocation on numerous occasions over the past five years. We have always been opposed to the building of houses on the grade 1 and 2 agricultural land, the loss of separation between Westgate and Garlinge, the loss of open space and the over development of our small town. We believe that other, preferably brown field sites should have been chosen for a development of this size.

We understand that there is a need for housing, however we have always been concerned that the methodology used to calculate the housing need in Thanet caters for developers and those moving to Thanet from outside the district, more than local residents. We are concerned that this methodology which does not value agricultural land will result in Thanet becoming more and more densely populated with no concern for the over-arching impact on our towns, our residents or the environment.

As the local plan was approved this year, we had to concede that this land will be used as a strategic site for housing against our will. We are now eager to ensure that if houses go ahead that they are future looking, take the environment and our residents into account and do not impact the town in a negative way, now or in the future.

## Summary

We oppose this masterplan application for the following reasons:

- West of Minster Road, the application extends beyond the designated allocation in the agreed local plan. We oppose this extension.
- The land south of the bridle path in the area West of Minster Road should be kept as open space.
- The application has not considered the extensive bird population on the farmland, nor the the functional land nor the wildlife fully.
- The conservation and ecological assessments are out of date as they do not consider changes in farming management which began early 2019. They also do not mention badgers which have been seen on the allocation.
- The application plans no renewable energy installation and does not agree with the aspiration of policy CC04.
- The masterplan will therefore not leave the environment in a better state for future generations due to lack consideration for nature and impact on greenhouse gas production.
- There is no clear travel plan.
- There is no clear plan for water supply and sewerage.
- There is no clear modelling of the effect of the 2000 houses on surface water drainage and therefore there may be risk of death from change in surface water flow.
- The type of housing planned does not cater for the housing need in the area.
- The effect on increased traffic on Minster Road and parking in roads such as Victoria Avenue and Belmont Road has not been fully considered.
- The affordable and social housing plan is not clear.

## Objection

We oppose this masterplan for these following material planning concerns.

### **Allocation west of Minster Road**

In the area west of Minster Road we oppose the building of housing beyond the allocation set out in the adopted local plan. The local plan allocation enables a resident to walk across the bridle path travelling West from Minster Road to Somali Farm with large open countryside views to the south. This open view and open space south of the bridle path is important to the residents of Westgate and Garlinge. Many walkers, dog walkers, joggers and horse riders use this bridle path as part of their weekly exercise, and this became even more important during lockdown. The proposed allocation by Millwood Homes goes beyond the allocated area within the adopted local plan and sandwiches part of the bridle path between two sets of housing areas. We oppose the building of housing south of the bridle path.

We recommend that the land south of the whole bridle path in Westgate should be kept as open space, therefore allowing residents to continue to enjoy a walk with views of farmland and countryside to the south.

### **East of Minster Road**

The views across farmland to the south of the footpath which travels East of Minster Road to Garlinge is being lost in the adopted local plan allocation. It was hoped that a path would be incorporated at the southern edge of the red line of the local plan allocation so that people would still be able to enjoy a countryside experience. However, with the extension of the site all the way down to Shottendane Road as proposed by the developers in the masterplan, this opportunity is lost.

We understand that the extension of the allocation down to Shottendane Road east of Minster Road will enable better access to the site from Shottendane Road and may therefore form a better design of the site, however, with this loss of countryside it is even more important that housing is not built south of the bridle path on the allocation west of Minster Road.

### **Birds on the site**

We oppose the application due to the lack of meaningful mitigation for the farmland birds that currently feed and even nesting on the site.

Chapter 10 para 10.68 states that there is "a good assemblage of breeding farmland birds including corn bunting, yellowhammer and skylark".

10.92 states that "Dunnoek, song thrush, skylark, house sparrow, yellow wagtail, yellowhammer and corn bunting are also defined as Species of Principle Importance (SPI) under Section 41 of the NERC Act 2006, which means their presence within a site is a material consideration in the planning process."

There is a particular disregard for the safeguarding of the protected bird species that were identified in the farmland areas as there is no mitigation strategy put in place to support them and they do not form part of the mitigation afforded by the tariff sum.

We are also concerned that despite chapter 17 mentioning breeding birds. The concluding table, Table 17.2 - Summary of Significant Effects of the Proposed Development has completely failed to mention birds of any sort.

The ecological and bird assessment also took place before a significant change in farming management by Quex Estates and is therefore out of date. The current assessments likely underestimate the bird populations on the site. Hundreds of swifts were seen feeding on the fields over the summer, corn bunting, sky larks and others have delighted residents during lockdown and thousands of starlings live in the surround areas and feed on the farmland. These populations need to be taken more seriously, updated reports need to be carried out and analysed fully and meaningful mitigation needs to be planned.

### **Impact on wildlife**

We oppose the application as it does not fully mitigate the effect on protected species such as bats and slow worms. The data seems to be incomplete and there is no mention on how the effect of pets and light on bats and reptiles on the site will be mitigated. There has also been a recent sighting of badgers.

The report is not clear as to whether other species were found on the site. The separate survey by Colin Plan Associates in April 2019 could not be found in the list of documents.

### **Renewable energy**

We oppose this masterplan as it does not incorporate any renewable energy into the design. Climate change is the biggest threat to humanity; however, the developers have failed to address this in their design. Instead of building low carbon housing, which is possible now, they have designed a development which will add significant greenhouse gas emissions to the atmosphere.

The developers report states "After taking into consideration a number of different factors, including local authority requirements, land use, potential noise impacts and available space within the development, as well as 7.22% CO2 reduction, it was concluded that no renewable technology is viable for this scheme". This is a blatant disregard to future populations.

We oppose the development on these grounds. The approach taken by the developers is against the aspiration of policy CC04.

### **Lack of travel plan**

Before this masterplan is agreed, the WoSTC needs to understand how traffic will move around the site and the overarching travel plan. As this is not available to us, then we oppose the application on these grounds. This is a strategic issue that impacts on all 6 phases of the development and should be clear from the outset.

It is extremely important to understand how the development might impact Minster Road and the Minster Road/ Canterbury Road crossroads, however this has been omitted. Many families cross Minster Road on foot and any extra vehicular movements on the road could cause it to become dangerous. We would need to be sure that this is not the case, or that mitigation measures were put in place (such as a crossing) before we approved this application.

We are also concerned about the timings of the inner circuit build out and how this will affect traffic flow. It is important to see a clear infrastructure delivery plan, but this information is missing in this application.

### **Type of housing**

The developers should be providing 340 units of accommodation for the elderly as this is advocated in the SHMA and Thanet Policy SP14. The proposed provision is well below this number.

The provision of 100 extra care units is not definite and there is a real concern that no extra care housing will be provided. Could a condition be placed on the granting of any outline permission, to ensure that the provision meets advocated guidelines in future phases?

The site also does not provide any areas for self-build plots, which fails to meet the requirements of Policy SP14, and without this, the scheme misses out on an opportunity to provide variation and difference in the street scene.

### **Parking**

There are also concerns around parking on the proposed allocation east of Minster Road, especially around the school and medical centre area. If this is not fully catered for then this will add to parking pressure on the surround roads, such as Victoria Avenue and Belmont Road, which are already exceptionally crowded.

### **Surface water flooding**

As many Westgate residents will remember the death of residents due to a combination of dry weather and the farmer ploughing the fields towards Belmont Road followed by a down pour, we are naturally concerned about the effect of concreting over the farmland on surface water flow.

We oppose the application because the effect of the new housing on increase in surface water flooding has not been modelled and therefore there could be an increased risk of surface water flooding to our residents due to this.

### **Water accessibility**

We oppose the application because of the lack of information around water availability to residents. We live in a drought prone area and this will become worse due to climate change. This application does not fully address how new residents will access enough water in the future and does not address the impact this will have on existing residents supply.

### **Sewerage**

This plan does not make it clear if there is a strategic plan for sewerage on the site. Southern Water has had difficulties in the past and therefore we are concerned about the effectiveness of the sewerage system. At this stage we would have expected to see an overarching plan for sewerage, but this is not available to us. For this reason, we oppose the plan.

### **Affordable and social housing.**

It is not clear how much affordable housing and social housing is planned, and we are specifically concerned about the possible lack of affordable housing in phase 1.

### **Effect on residents abutting the development.**

The overall masterplan shows that housing backing onto and side on to the new development will keep the soft edging that they currently enjoy, which includes wildflowers, hedgerows and small trees in between their properties and the new residents. This is welcomed and shows that the biodiversity around the edges of the farmland previously established by the farmers will be protected.

The design should however prevent any overlooking of the existing residents and the prevailing character of these hinterland areas needs to be considered carefully when finalising the scheme. The developer will need to consider the fact that the land rises from Victoria Avenue and Belmont Road, meaning that housing could be higher than the existing residents. The developers will need to consider how this will impact light to the residents abutting the development.

### Connection to existing communities

The extension of Victoria Ave and Belmont Road leading to approximately 10 houses each was deemed appropriate to allow a turning circle for cars and to also allow walking and cycling connection from existing and new neighbourhoods. The Town Council would oppose any extension of the vehicular connection between these roads and the new development.

We have concerns with the lack of proposed walking routes between the centre of Westgate and the new development and believe that this has not been considered carefully. A crossing on Minster Road would be welcomed.

Yours sincerely,

Westgate-on-Sea Town Council