

Westgate-on-Sea Town Council
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3rd October 2018

Councillor R Bayford
Thanet District Council Offices
Cecil Street
Margate
CT9 1XZ

Dear Councillor Bayford

Re: Draft Local Development Plan Westgate on Sea Town Council Response to Consultation

I am writing to express our opposition to the proposal to allocate a total of 2,500 new houses to Westgate on Sea, in the framework of the latest draft local development plan. Our position is based on the following facts:

- 1) The OAHN (Objectively assessed housing need) is grossly overstated, because it is based on completely out-of-trend figures for a single year (2013-14). Moreover, it underestimates the additional accommodation which can be provided from currently unoccupied dwellings and does not take into account the proportion of elderly people in the existing population.
- 2) The population density in Thanet in general, and in Westgate in particular, is already very high compared with the rest of Kent.
- 3) Our schools and clinics are already overstretched.
- 4) Additional housing would have to be built on prime agricultural land, which is contrary to the Government's food security and environmental plans post-Brexit.
- 5) There are serious questions about the effects of increases in housing developments on the water table here.

In addition, the process of consultation has been inadequate and unacceptable. Thanet District Council will not release the feedback from the Open Spaces consultation which was completed over

a year ago. Moreover, Thanet District Council “lost” the representation from Westgate on Sea in 2015. In the latest consultation, it seems the draft plan supplied to Westgate on Sea Library was not the correct version.

In our view Thanet District Council should reject the ‘one-size-fits-all’ OAHN figures from Whitehall and insist on a more serious approach to local planning. Thanet is an exceptional case because of its level of deprivation – it is not part of the “rich south-east” as it is commonly perceived.

1. OAHN

- i) The findings in the latest report (2016) by G L Hearn, which increase the estimates for population growth in Thanet, are distorted by the figures for 2013-14 which are completely untypical and for 2014-15 which are very high; this can be seen easily in figure 2 of the summary. More up-to-date ONS figures for 2016-17 (July-June) show a return to the lower trends in earlier years, with natural growth showing a *decline* of 200, internal net migration at 419 and international net migration at 314, giving total net annual growth of 533, far below the 1,365-annual growth in the Hearn report, which in our view is completely discredited. The latest figures for EU net migration show much sharper falls than those predicted in the report – indeed, the figures in the report would be counter to Government policy. The figures have clearly been ‘pumped up’ to legitimise massive migration into Thanet from London.
- ii) There are nearly 2,000 empty, derelict and unoccupied dwellings in Thanet and the first priority should be to focus on those.
- iii) The proportion of elderly people in Westgate (nearly 30%) is well above the Thanet average, and almost double the national average of 16%.

2. Population density

- i) Thanet, at 27%, is already far more ‘built-on’ than the neighbouring districts (eg. Dover at 8% and Canterbury at 9%).
- ii) The population density tables of ONS for 2017 show a Kent average of 439 and a Thanet average of 1368 (so Thanet is already over 3 times the average for Kent), compared with Dover at only 368 and Canterbury at 531. The current population density in Westgate is already over 2,800!! The proposed allocations of new homes would double the population and therefore the population density of Westgate, thus increasing overcrowding and the pressure on schools and clinics.

3. Schools and clinics

- i) Westgate surgery is now over-subscribed with 10,200 registered patients (maximum 10,000 registrations). It is too cramped in its premises and adding residents will result in a deterioration in health care for all. Even within Thanet, Westgate is already a deprived area, with health indicators for life expectancy and disability considerably worse than average.
- ii) The two primary schools in the area proposed for housing (St Crispins and Chartfield) are overcrowded and under-resourced.

4. Agricultural land

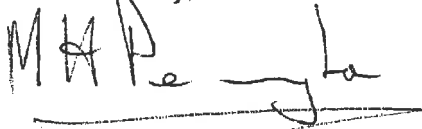
- i) The land proposed for development is prime agricultural land and its use for housing is opposed by CPRE. This is contrary to the Government's plans for agricultural self-sufficiency post-Brexit.
- ii) The fact that Quex have offered the land for sale does not take community or national food security interests into account.

5. Water supply

- i) We understand the water table in Thanet is at risk and further housing development could create serious water supply problems.

It is for Thanet District Council to represent the people of Westgate to the authorities in Whitehall, but in the past, we feel we have been let down. We need someone to stand up for us and demonstrate that we can manage our own development.

Yours sincerely,



Councillor M Pennington
Chairman of Westgate on Sea Town Council

