

Westgate-on-Sea Town Council



Neighbourhood Development Plan

2021 - 2040



Referendum Version, 2023



Produced by the Neighbourhood Plan Steering Group

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1 Introduction

Westgate-on-sea is a lovely seaside town with historic character and charm. It has the best of both worlds with two beautiful beaches to the north and parks and countryside to the south. The quaint town centre retains its heritage and also boast independent shops, cafes, restaurants and bars.

Westgate-on-Sea Town Council and the residents of Westgate want to protect and enhance the town for the benefit of present and future generations. We hope that this neighbourhood plan will help to fulfil this aim.

The Westgate-on-Sea Neighbourhood Plan (NP) is a new kind of planning document. It is part of the Government's approach to planning which aims to give local communities more influence in their neighbourhood's development. The NP has been produced by the 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 TDC Local Plan called "Westgate" spans both Westgate-on-Sea and Garlinge and greatly affects both areas. The NP has been prepared through consultation with residents through the feedback at the launch meeting (~250 residents) and the big community survey (500 residents responded).



Figure 1-1 Farmland South of Westgate and Garlinge.
All photographs are Copyright Dr Hannah Scott unless otherwise stated

The main concern around development in Westgate is the allocation of 2000 houses on high quality farmland. The land is being sold by Quex Park Estates, Birchington to the developers Millwood Homes (owned by Places for People). This allocation has shocked and distressed many of our residents.

Westgate-on-Sea Town Council has written to Thanet District Council (TDC) numerous times and organised protest walks against what it feels is over development in the town and lack of concern over open space, our farming heritage and food security. Please go to the Westgate-on-Sea Town Council Website to read the letters sent to TDC regarding the allocation during

the three Local Plan consultations in 2015, 2017 and 2018 and the final local plan modification in 2020: <https://www.westgateonsea.gov.uk/community/westgate-on-sea-town-council-13327/local-plan-consultation/>. We have been informed that the housing need for Thanet was calculated and that the development is necessary to meet the housing need for the area.

We opposed the building of houses on this top-quality agricultural land however we were soon made aware that it is not lawful for this Neighbourhood Plan to allocate less houses in Westgate than proposed in the TDC Local Plan. Therefore, this document cannot be used to stop the housing allocations. Any development that does go ahead can however be influenced by the policies that we include within this document, and therefore this is the main rationale for writing the NP at this time. These policies can look at housing design, infrastructure and biodiversity of new areas, and aim to get the best development possible, if it does have to go ahead. We are adamant that the area south of the allocation in Westgate (West of Minster Road) should remain as open space, to allow residents to walk along the bridle path and continue to enjoy the views across the countryside. We have added a policy regarding this. We will also continue to lobby the government for a change in the law on building on agricultural land.

A further threat to Westgate-on-Sea is the demolition of large, detached houses for the purpose of building large blocks of flats along Sea Road. One such building, which the Westgate-on-Sea Town Council and TDC refused, was approved under appeal to the Planning Inspectorate, and is now being used to set a precedent for these oversized, out of character blocks of flats on the west side of Sea Road. Policies will be set in place within this document to prevent this type of business-driven planning that negatively affects the character of our seafront.

A further concern recently is the cutting down of trees to enable developments. At a time when climate change is clearly affecting the UK through heatwaves and flooding, the Town Council would like to see all trees in the conservation area preserved (unless a danger) and more trees planted. Alongside these aims, the proposed planning policies aim to protect and enhance our historic town centre, our community assets and green spaces throughout the town.



Figure 1-2 Westgate Bay

A further section called Community Actions is included in this plan, setting out strategies for managing other important aspects of the town that are not under planning law. These aspects have been raised by residents in surveys and feedback during the workshops and Saturday morning surgeries. Only the planning policies in the first section of this document will be reviewed by the independent planning examiner.

2 Planning policy framework

If the Westgate-on-Sea Neighbourhood Plan is passed at a local referendum and then ‘made’ by TDC, it will become part of the Development Plan alongside the TDC Local Plan. Therefore, the new neighbourhood plan (NP) is an important document which will be used to determine planning applications in Westgate-on-Sea.

Neighbourhood Planning was introduced through the Localism Act 2011. It provides communities with the opportunity to have greater influence over housing development, building development, protecting green spaces, transport and traffic management and provision of community facilities.

The Ministry of Housing, Community and Local Government (HCLG, 2018) stated:

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to

choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.”¹

Unfortunately, the town has not been afforded the opportunity to decide where houses will be allocated in the town as the large allocation in the TDC Local Plan has already been decided. As the NP sits within the National Planning Policy Framework (NPPF) and the Local Plan produced by TDC, then it must be aligned with these and cannot allocate fewer housing than that allocated in the Local Plan. However, we can still have a say in how these houses are designed and other aspects as described in the introduction.

The HCLG (2018) go on to say: “Neighbourhood planning enables communities to play a much stronger role in shaping the areas in which they live and work and in supporting new development proposals. This is because unlike the parish, village or town plans that communities may have prepared, a neighbourhood plan forms part of the development plan and sits alongside the local plan prepared by the local planning authority. Decisions on planning applications will be decided using both the Local Plan, the Neighbourhood Plan, and any other material considerations.

Neighbourhood planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years in ways that meet identified local need and make sense for local people. They can put in place planning policies that will help deliver that vision or grant planning permission for the development they want to see.

To help deliver their vision communities that take a proactive approach by drawing up a Neighbourhood Plan or Order and secure the consent of local people in a referendum, will

¹ <https://www.gov.uk/guidance/neighbourhood-planning--2>

benefit from 25% of the revenues from the Community Infrastructure Levy arising from the development that takes place in their area.”²

We are therefore hopeful that once ‘made’ the NP will enable the town to access a significant proportion of the Community Infrastructure Levy arising from developments taking place in the town by identifying projects where CIL receipts could be spent. To explain this further, Locality produce guidance for local communities on how communities can benefit from CIL receipts: <https://neighbourhoodplanning.org/toolkits-and-guidance/understanding-community-infrastructure-levy-cil/>

3 The Neighbourhood Development Area

The Westgate-on-Sea Neighbourhood Plan Area, to which this Neighbourhood Plan relates, was designated by TDC on 20th October 2016 and covers the Westgate-on-Sea Parished area, as shown in the map below.

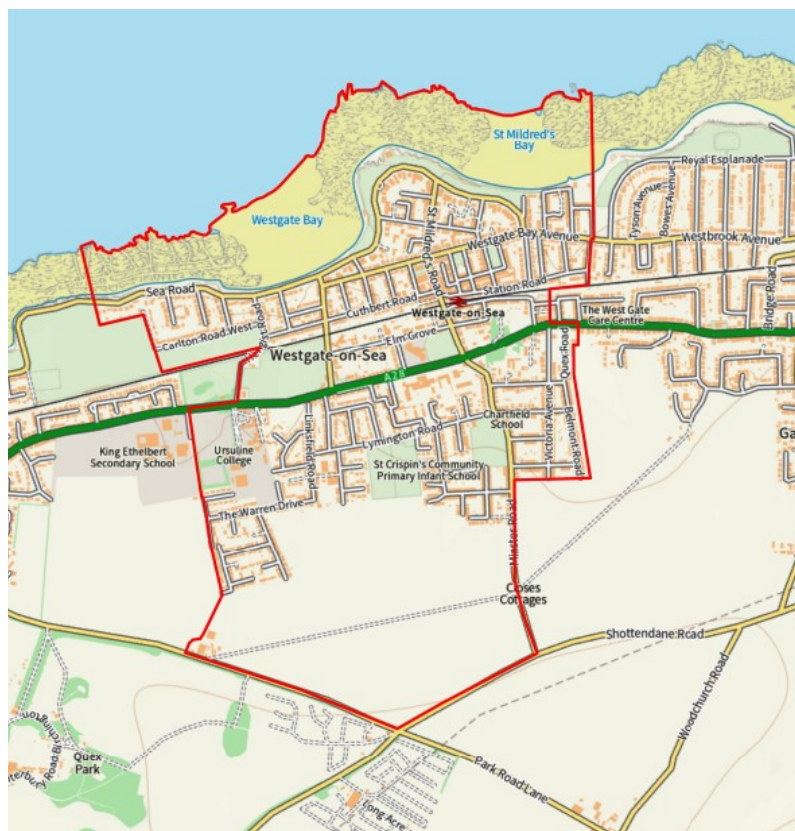


Figure 3-1 The Westgate-on-Sea Neighbourhood Plan area¹ Map copied with permission of TDC. © Crown copyright Ordnance Survey 100018261. Reproduced by Westgate-on-Sea Town Council under PGSA licence number 100058504

² <https://www.gov.uk/guidance/neighbourhood-planning--2>

4 Time period covered by the Neighbourhood Plan

This NP will align with the time scale of the TDC Local Plan which runs from 2011 – 2040. Therefore, this NP will have a plan period from 2021 – 2040. It will be reviewed at five yearly intervals.

5 Strategic Environmental Assessment and Habitats Regulation

Assessment

A Strategic Environmental Assessment (SEA) is required under European Legislation for all plans which may have significant effect on the environment. A Habitat Regulation Assessment (HRA) refers to appropriate assessment required to assess the potential implication on European wildlife sites. It is the role of TDC to screen this NP and consult bodies such as Historic England, Natural England and the Environment Agency.

The initial draft of this Plan was screened by TDC and shown to have no significant impact on Natura 2000 sites. Further to this, TDC as Local Planning Authority, did not consider that the Regulation 16 version (September 2022) of the Neighbourhood Plan included any major changes to existing policies, or added any new policies, that would warrant further screening. On this basis, the Local Planning Authority was satisfied that the report of January 2020 was up-to-date and relevant to the Regulation 16 version of the Neighbourhood Plan.

The SEA and HRA Screening Report is available as a background document to this Plan on the Town Council's Neighbourhood Planning web-page.

6 Complications for the Neighbourhood Planning process in Westgate-on-Sea

There have been two major complications whilst drawing up this NP.

- 1) The housing allocations on the agricultural land as stipulated by the TDC Local Plan and the moving goal posts: 1000 to 2000 houses.
- 2) That the 2000 house allocation spans both Westgate-on-Sea and Garlinge boundaries, while the whole allocation affects Westgate.

Some NPs have the luxury of starting from scratch and allocating areas for housing that they deem suitable, however this has not been the case for Westgate. However, having an NP in place will enable these top down TDC allocations to meet the aspirations of the community, for example through design and style, so that they can be best integrated into the community. The position of the NP in regard to the new development, is set out in Section 18 and there are several Community Actions that are being proposed in Section 19 that set out how the WTC will best support the community and manage the large-scale developments being proposed on the surrounding farmland.

7 About Westgate-on-Sea

Westgate-on-Sea is blessed with an accessible coastline, rich agricultural land and has, within recorded history, seen a succession of settlers. These include the Romans (circa AD 43), the Anglo Saxons (many place and road names originating from the nobility and elite of this era), the Vikings, Medieval England, through to the Victorians to the Edwardians and their railways.



Figure 7-1 West Bay

As with many seaside towns, the affordability of package holidays abroad led to a decline in tourism in the late 1900's however recently the area is bucking the trend. Margate, the neighbouring town, has recently been called the "UK's hippest resort" by the Sunday Times, with its new art quarter opposite the Turner Art Gallery. Tourists often visit quieter and quainter Westgate, with the ability to dip into the hustle and bustle of Margate as and when.

Westgate is a fairly affluent area, however there is a significant gap between rich and poor, as is present in all areas of the Isle of Thanet.

It has a friendly character and two wonderful beaches: West Bay and St Mildred's Bay, which are popular with tourists in the summer.

People also travel in from wide area to go to the Carlton cinema in the old Town Hall building. The town has good public transport, being accessible from other areas of Thanet via the Stagecoach bus service. There is also a train service to London Victoria and St Pancras and a National Express coach service to London.

In addition to this, there is a Community Transport Scheme for transporting the elderly and less able to shops, doctor/hospital appointments and for local community outings.

Westgate-on-Sea town centre is notable for its extensive shop front canopies in Station Road and environs, historical buildings and churches. The town also has a number of squares (Ethelbert and Adrian) and parks e.g., Lymington Recreation Ground and Lymington green. The Town Council has been working on securing funds to improve



the canopies in Station Road. The Town council has also joined the [Figure 7-2 Lymington play area](#) In Bloom competition and have planted wildflower seeds, bulbs and trees on Lymington Community green (See community action section for more details).

In the southern area of the town, the Lymington Community Centre is a hub of activity as is our well attended Westgate Library. The Cambourne Avenue retail area also has a plethora of local shops and the allotments bring joy to many of our residents.

Events in the town

Each year the town organises a Pancake race through the high street which is attended by the local infant and junior school and is a fun day for all ages.

In 2019, a new annual event called Westgate Day began and was a great success. The Scarecrow Festival also began in 2020. These will hopefully continue for years to come. (See community action section for more details).

Education offering

There are quality schools in the town including St Crispin's CP Infant School, St Saviour's Church of England Junior School, Chartfield Independent Primary School & Ursuline College. The town is also home to the London House School of English, which teaches English as a Second Language to foreign students. This boosts the local economy as many residents become host parents during the school holidays.

Population and Demographics

There were 6,996 usual residents as at Census day 2011. Of these, 95.8% lived in households and 4.2% lived in communal establishments. The average (mean) age of residents was 43.9 years; however, Westgate has a large elderly population. The full data from the 2021 census will not be published until March 2023.

In total there were 3,623 household spaces at the census. Of these, 3,255 (89.8%) had at least one usual resident and 368 (10.2%) had no usual residents.

Town history by Dr Dawn Crouch

In the mid to late 1800s our area was rediscovered by the modern developers who created a private estate at Westgate utilising the area's natural beauty of the white cliffs, wide bays, pure water and proximity to the Cities of Canterbury and London to attract both the aristocracy, middle classes and families to the new and exclusive seaside and health resort. Developments provided large private homes, smaller town houses and unique terraces of small seaside homes, and after the two world wars came many private boarding houses and several hotels. This popular style of seaside accommodation thrived until the early 1960s when the advent of cheap air flights opened up the world for everyone, offering guaranteed sunshine at exciting foreign destinations at the expense of the traditional English seaside holiday.

The town is notable for once being the location of a Royal Naval Air Service seaplane base at St Mildred's Bay, which defended the Thames Estuary coastal towns during World War I. The town is also the subject of Sir John Betjeman's poem, Westgate-on-Sea. Residents have included the 19th-century surgeon Sir Erasmus Wilson and former Archbishop of Canterbury

William Temple. The artist Sir William Quiller Orchardson painted several of his best-known pictures while living in Westgate-on-Sea. The British composer Arnold Cooke attended the town's Street Preparatory School in the early 20th century, and Eton headmaster Anthony Chenevix-Trench spent the earliest few years of his education in the town.

In the 19th Century during the early years of 'modern' development Westgate-on-Sea became a popular location for the establishment of schools, parents from the Cities and overseas favoured the fresh air for their offspring and at one time there were around twenty schools. However, two world wars and evacuation policies brought a fairly rapid end to this era, many buildings were converted into residential flats and slowly the retirement market opened up.

The most recent addition to Westgate-on-Sea has been its own Town Council which has offices neatly situated on St Mildred's Road in the heart of the town, providing information and support for the community. Previously in 1894 Westgate-on-Sea became a civil parish within the Isle of Thanet Rural District but by the early 1930s the Parish had been swallowed up by urbanisation and the Parish Council no longer existed until its re-establishment on 7th May 2015 as the Westgate-on-Sea Town Council.

For a full history of the town by Dr Dawn Crouch please see the Westgate-on-Sea Town Council website: <https://www.westgateonsea.gov.uk/community/westgate-on-sea-town-council-13327/westgates-history/>.

Local Heritage Statement

The importance of heritage cannot be underestimated for it provides a window into the past on lifestyle, habitat and behaviours which have shaped how we live in the present. Thanet District Council's Local Plan (Policy HE03 on Heritage Assets) makes it clear that local heritage assets will be identified in a 'Local List' as part of Thanet's Heritage Strategy.

The Localism Act 2011 and the National Planning Policy Framework (NPPF) (March 2012 - updated July 2021) underline the importance of planning at both the local and neighbourhood levels. Neighbourhood Development Planning encourages communities to influence and map the future of their area.

A Neighbourhood Development Plan (NDP) can be a forceful tool in forming part of the statutory development plan (Local Plan) for the area. It enables appropriate future developments to enhance the environmental, social and economic needs and possibilities of the area through the identification of its historic assets which need protecting, including areas which could benefit from changes.

NDPs and their heritage policies highlight the significance of, and the need to protect, historical assets which have shaped an area and, in the case of Westgate-on-Sea, created - through historical development identified by the architecture and use of the land - a highly attractive draw to the Isle of Thanet as a whole, which is currently considered to be a deprived area, despite its beautiful coastline and open countryside.

Westgate-on-Sea takes its name from the medieval Westgate Manor and before the 1850s was a simple farming community at the mouth of the Thames Estuary. The farming heritage and its present-day contribution to food production is seriously under threat by proposed building developments. The open spaces of rich agricultural land are, surprisingly, unprotected by legislation despite their considerable contribution to national food production³ and, with climate change in developed countries, has the potential to enhance its contribution to the nation's food production with an increased ability to produce a greater variety of crops, grown and distributed directly, so reducing carbon emissions and supporting the global goal of a cleaner environment.

During the late 19th Century, with the advent of the railway, wealthy construction developers recognised the benefits of sea-water bathing and the fresh air at Westgate-on-Sea and created an exclusive resort within a private estate to provide vacation homes for the upper and upper-middle classes of London. Part of the construction process required accommodation for the skilled workers who created the architectural designs commissioned by the city dwellers. Today, a large proportion of our heritage is evidenced by the artisans' cottages on the south side of the town, many display features which even the best of present-day skilled craftsmen struggle to replicate, hence their invaluable contribution to both the

³ 'A scientific consensus exists that three of the most important 21st Century issues are food security, depleting natural resources and climate change – agriculture is at the heart of this trilemma.'
<http://raconteur.net/sustainability>

history and the historic character of the town. A fine example of this 'character' can be seen along Station Road with its terraced shops and canopied walkways.

In addition, beneath the agricultural land near the southern boundary and between Westgate-on-Sea and Birchington lies a significant archaeological site known as Quex Park Settlements. An archaeological site provides evidence of past human activity and contributes to the history of place and people, Historic England consider these Settlements to be a substantially important source of knowledge on Romano/British innovation and lifestyle and have placed the Settlements on its 'at risk' register.

The Local List of Non-Designated Historic Assets for Westgate-on-Sea identifies what are considered to be the best examples of historically meaningful buildings and features within the town. It is a publicly accessible guide to the historic landscape of the locality, providing appropriate information to aid planning decisions within an historic environment. The Local List supports conservation, whilst effecting changes and developments which positively impact on the assets' significance both in the present and for the future.

Westgate-on-Sea has the natural resources to continue to provide fresh air and open spaces for the wellbeing of all who live in and visit the area. In addition, the town is an enduring example of the influence of London developers on English architecture within a seaside setting during the late 19th Century. Westgate-on-Sea, and the surrounding area, has the potential to become a nationally recognised area of notable heritage and wellbeing, as opposed to being deprived, undervalued and oversaturated by unsympathetic modern development.



Figure 7-3 View of shops

8 Our vision and objectives for Westgate-on-Sea

The overall vision for Westgate is as follows:

Recognising Westgate-on-Sea is a special place to live in and visit, we aim to retain this status, by protecting our environment and communities, whilst seeking to encourage change which will enhance the appeal of the area, as well as its sustainability.

Our vision is to conserve and enhance the heritage and sea scape of our town with its backing of quality agricultural heritage, to retain its uniqueness within the county and the area of Thanet in general.

To improve and expand within a realistic and acceptable framework, to build for the future without impacting the environment negatively.

Objectives:

1. To protect the character of the seafront whilst encouraging sustainable growth in tourism. *(Achieved by policy WSPN1, 2 and 4)*
2. To protect the town centre and encourage businesses and employment. *(Achieved by policy WSPN5 and 6)*
3. To protect the local heritage of the town, the conservation areas and the nearby Schedule Ancient Monuments. *(Achieved by policy WSPN7, 8 and 9)*
4. To protect and enhance our local community assets and local green spaces. *(Achieved by policy WSPN12, 13 and 17)*
5. To protect the small-town identity whilst allowing suitable, sustainable development. *(Achieved by Policies WSNP2 and WSNP3)*
6. To encourage low carbon developments with renewable energies and green innovation within the town. *(Achieved by policy WSPN10)*
7. To work with the developers of the potential 2000 houses allocated in Westgate-on-Sea locality (including Garlinge) to ensure that the development has the least negative and the most positive outcomes as possible. *(Achieved by policy WSPN1, 19 and 20)*

A list of specific objectives for the new 2000 home housing allocation are set out in section 18.

9 Schedule of planning policies

The planning policies have been holistically grouped into themes, covering design, the economy, heritage, sustainability, green space, biodiversity, and facilities.

Design:

1. Seafront
2. General design principles

Economy:

3. Tourism
4. Shopping area
5. Business Uses

Heritage:

6. Conservation areas
7. Heritage Assets
8. Scheduled ancient monument

Responding to the climate crisis:

9. Low carbon developments
10. Surface water flooding

Green and Open Spaces:

11. Local Green Spaces
12. The Green Wedge
13. Agricultural land

Biodiversity:

14. Trees
15. Protected species and biodiversity

Facilities:

16. Community Facilities
17. Provision of infrastructure
18. Developer Contributions
19. Section 106 monies

New developments: The houses allocated on the agricultural land in Westgate and Garlinge:

20. Design of the 2000 houses
21. Residents abutting the new development

10 SUSTAINABILITY

10.1 Sustainable Development

Section 2 of the National Planning Policy outlines that the purpose of the planning system is to contribute to the achievement of sustainable development. At a high level, this sustainability objective can be summarised “as meeting the needs of the present without compromising the ability of future generations to meet their own needs” (NPPF Paragraph 9).

At a local level, in accordance with Objective 5, it is important to understand what makes Westgate-on-Sea special, unique and what gives it its character now, in order that development proposals can build on these positives. By building on these identified principles the town can thrive and grow in a sustainable manner, without detrimentally impacting on current and future residents.

Therefore, in order to deliver sustainable development, this Neighbourhood Plan seeks to address the three overarching objectives of sustainable development, economic, social and environmental objectives, through a variety of planning policies. In addition to setting an overarching policy to support sustainable development in the Neighbourhood Area.

The following overarching policy is the aspiration for sustainable development across the Neighbourhood Plan area:

WSNP 1 Sustainable Development

When considering new development in the Westgate-on-Sea Neighbourhood Area, a positive approach that reflects the presumption in favour of sustainable development, as set out in the National Planning Policy Framework, should be at the forefront of all proposals.

11 DESIGN

11.1 Seafront

The Westgate-on-Sea coastline is recognised nationally and internationally for nature conservation and scientific interest.

It is part of the Thanet Marine Conservation Zone (MCZ) which contains the best examples of a variety of features found within the south-east region, including rare areas of subtidal chalk that extends seawards from the chalk reefs, cliffs and coves.



Figure 11-1 Looking out across West Bay

The chalk seabed within the area is the longest continuous stretch of coastal chalk in the UK⁴

The coastal area is also a valuable asset and resource in terms of tourism, sport and leisure. There are two beaches and bays in Westgate on Sea, both of which were awarded blue-flag status in 2018, West Bay, and St Mildred's Bay.

Recently there have been some developments along Sea Road which have been out of character and over massed for the area and have also been built much further forward than the neighbouring properties e.g., 8 Westleigh Road. The NDP proposes a level of protection in the form of Seafront Character Zones:

Sea Road will be separated into two zones: The West zone to the West of Domneva Road is primarily composed of large, detached houses, set back from the road and with a good degree of separation between the properties. The properties are mainly 2 storeys high, with only a few that extend into their roof space. The East zone to the East of Domneva Road is mainly comprised of taller dwellings (often 3 storeys) which are often separated into flats. We would not discourage development in the East zone, however we will not support any demolition of existing properties for the purpose of building new flats such as 8 Westleigh Road in the West Zone. Demolition of existing building for new builds of detached housing in the style already

⁴ Thanet MCZ factsheet

<http://publications.naturalengland.org.uk/publication/5573527184867328?category=1721481>

found in the area will be taken on their own merit, however over massing, those moving forward of a neighbourly building line and out of character applications will not be supported.

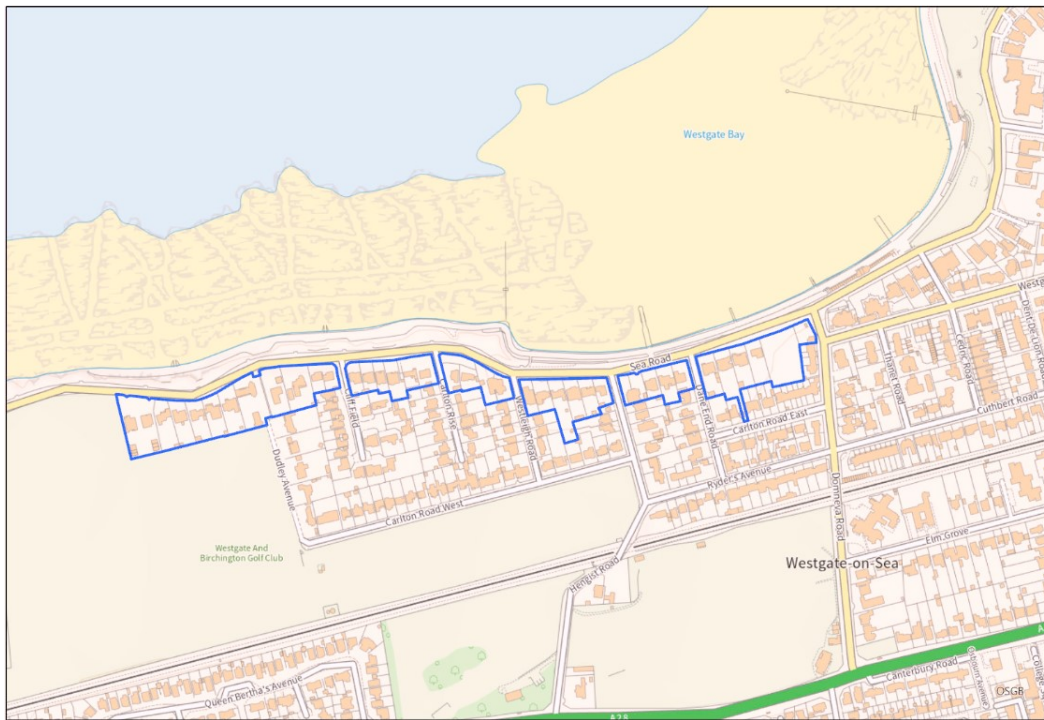


Figure 11-2 Seafront Character West Zone in Westgate-on-Sea. © Crown copyright Ordnance Survey 100018261. Reproduced by Westgate-on-Sea Town Council under PGSA licence number 100058504



Figure 11-3 Seafront Character East Zone in Westgate-on-Sea. © Crown copyright Ordnance Survey 100018261. Reproduced by Westgate-on-Sea Town Council under PGSA licence number 100058504

The 'West Zone' to the west of Domneva Road



Figure 11-4 The West zone to the West of Domneva Road

The 'East Zone' to the east of Domneva Road



Figure 11-5 The East Zone to the East of Domneva Road

WSNP2 Protection of Seafront Character in the West Zone

Proposals for the redevelopment of properties and sites in the West Zone of Sea Road, as defined on Figure 11-2, for the purpose of building flats and apartments, will not be supported where such proposals would lead to over-massing of the site, built development that is projected forward of the existing building line in the vicinity of the site and is in discord with the prevailing character of the West Zone.

Other proposals for development in the Seafront Character Zones should be planned and designed in accordance with the Design Guidelines set out in Section 11.2 of the Plan.

11.2 Design Guidelines

There is in the existing building stock of Westgate a wide range of architectural styles, including buildings that are distinctively Victorian and Edwardian and historic cottages. It is essential that new building work throughout the Neighbourhood Development Plan Area protects and enhances this heritage and this applies outside of the conservation area. In these areas design of development should be in keeping with the character of the area. The specific Conservation Areas policies will also be rigorously applied (See Section 13.1).

Contemporary designs will only be supported under special circumstances where the Town Council feels the design is of a standard that adds to the quality of the built environment without detracting from its existing character, including designs that improve energy efficiency including renewable energy. As the climate emergency is paramount, the installation of insulation and air source heat pumps to remove the need of fossil fuels for heating homes will be supported where they are added in a sympathetic manner. Solar pv will also be supported.

The Town Council will raise objections where standard designs widely adopted by national house builders and others are used, making little or no attempt to reflect the local heritage or take into account the climate emergency.

Design Guidelines for infill developments and householder applications:

All new buildings in the Westgate-on-Sea Neighbourhood Development Plan Area should strongly reflect the characteristics of the specific area in which they are to be located.

The characteristics will include particularly:

- Existing external materials and finishes in the immediate area.
- The size and scale of existing buildings in the immediate area.
- Fenestration of existing buildings and the prevailing architectural style.
- The existing pattern and density of development in the immediate area.
- The prevailing existing landscape, streetscape or other external setting that characterises the area in which the buildings are to be located.

The same criteria will be applied to extensions and external alterations where the characteristics of the host building will also be a fundamental consideration.

Design Guidelines for new large developments:

Buildings and the spaces around them should be thought about holistically, with the landscape and public realm, including open space provision, being as important as the building itself.

- Development should not detract from the character and amenity of the nearby area
- Development should not adversely impact on surrounding properties but should seek to maintain privacy and alleviate possible noise issues to existing neighbouring properties as well as seek to lessen its impact on the surrounding area.
- New builds should be in scale to the locality and height restricted (to include roof space) to scale with similar nearby properties.
- Parking provision in accordance with the adopted parking standards of Kent County Council.
- Road widths must demonstrate they are adequate for safe access by service and emergency vehicles at all times having regard to existing or projected on-street car parking.
- Where pedestrian walkways are provided alongside roads, the walkways should be wide enough to allow safe passage of pedestrians without recourse to use of the roadway. Access from and to existing roads should not impede local traffic or reduce parking provision for neighbouring properties.

- As traffic generated by new development will increase traffic on existing highways, measures to control vehicle speeds and/or to provide for pedestrian safety shall be considered. Developers to speak to local Speed Watch group.
- The density of new development should be in keeping with the character of the area and any relevant Conservation Areas.
- The National Planning Policy Framework (NPPF) acknowledges the link between planning and healthy communities and states that the planning system should support strategies to improve health and cultural wellbeing, promote healthy communities and identify policies that will deliver the provision of health facilities.
- Proposals should also take account of the guidance contained in the emerging Kent Design Guide, produced by Kent County Council.
- These guidelines apply to proposed developments containing more than 10 new dwellings.

WSNP3 Design Guidelines

Proposals for new development in the Plan area should take account of the Design Guidelines set out in Section 11.2 of the Plan in the planning and design of such proposals. Proposals which demonstrably reflect the Design Guidelines will be supported by the Town Council.

12 ECONOMY

To promote a prosperous economy, the NPPF states that Neighbourhood Plans should promote the retention and development of local services, this could include local shops, meeting places, sports venues, cultural buildings and public houses.

12.1 Tourism

Tourism plays a large role in the economy of Westgate-on-Sea and the protection of existing features that encourage visitors to the community is paramount. These include the cafes and restaurants along the seafront and in the town, visitor accommodation including guest houses, B&B and AirBnB's, as well as the extremely popular cinema. We would also like to encourage the enhancement of the range and quality of the facilities along the seafront and in the town, as requested in the community survey. The development of B&Bs or boutique hotels would also be encouraged in the East Zone of the seafront as would improvements to the Public Rights of Way (PRoW) network.



Figure 12-1 Popular Carlton Cinema on St Mildred's Road

WSNP4 Safeguarding leisure and tourism facilities

Proposals for the change of use or redevelopment of land or premises currently associated with leisure or tourism will only be supported where:

- a) The applicant can demonstrate that the site/premises is no longer viable and/or
- b) Development of the site for other appropriate uses will facilitate the relocation of an existing leisure or tourist facility to a more suitable site

12.2 The High Street and shopping area

Unlike many town centres which have been contracting, the town centre of Westgate-on-Sea is functioning well. However, there are opportunities to improve the High Street and the feedback from the surveys shows that residents would like to see it thriving. It is important to maintain the active street frontage and protect the shops in the high street from being converted into housing. Despite acknowledging that permitted development rights can enable the conversion of some units without planning permission, it is important to encourage more employment and businesses in the High Street.



Figure 12-2 Popular independent shop on St Mildred's Road

WTC will seek to protect existing businesses and shops from change of use that will erode the frontages of the local centre and undermine its function as a commercial centre. In order to support this aim WTC, in addition to policy WSNP3, will be seeking to work with TDC to implement an Article 4 direction which will remove permitted development rights and the conversion of existing commercial premises at ground floor level.

WSNP5 Protection of shopping areas

Planning applications that fall within the designated areas shown on Maps A and A1 in Figures 12-3 and 12-4 will need to include an impact assessment proportional to the scale of the proposal on the effect of the development on that shopping area and how any identified issues can be mitigated or the shopping area enhanced.

Planning applications in Westgate High Street and Lymington Road shopping area (as shown on Map A and A1) for the following classes will be supported:

Class E

Class F

Sui Generis use classes will be considered on an individual basis

Class C3 (Residential) will only be supported at first floor level and above, or on the periphery of the shopping area, where change of use to residential may be acceptable on the ground floor and above.



Figure 12-3 MAP A High Street in Westgate-on-Sea - highlighted area of map © Crown copyright Ordnance Survey 100018261 Reproduced by Westgate-on-Sea Town Council under PGSA licence number 100058504



Figure 12-4 MAP A1 Shopping area on Lymington Road © Crown copyright Ordnance Survey 100018261 Reproduced by Westgate-on-Sea Town Council under PGSA licence number 100058504

12.3 Existing Businesses

Not only does Westgate benefit from a vibrant and commercially active central shopping area. There are several other businesses located in the Parished area which actively provide employment and help to sustain the local economy. It is important that these enterprises are actively maintained to help provide a balanced community for all.

WSNP6 Retention of employment space

Proposals for the change of use or redevelopment of land or premises identified for or currently in employment use will only be supported where:

- a) The applicant can demonstrate that the site/premises is no longer capable of meeting employment needs; or**
- b) Development of the site for other appropriate uses will facilitate the relocation of an existing business to a more suitable site or where there is no reasonable prospect of the site being used for employment uses; or**
- c) Unacceptable environmental problems are associated with the current use of the site and the proposal will remove them; or**
- d) Relocation of the business will make better use of the existing or planned infrastructure.**

13 HERITAGE

The town of Westgate benefits from a fruitful heritage, with several listed buildings, conservation areas, areas of archaeological importance, scheduled ancient monuments, and a historic economic core and seafront setting. It is important that these heritage assets are maintained and protected for future generations to enjoy and benefit from, as they provide a sustainable means for the future and a link to the past.

13.1 Conservation areas

A Conservation area is a part of the locality of special architectural or historic interest, the character or appearance of which is desirable to preserve or enhance. Conservation area designation is a means of recognising the importance of the quality of the area as a whole, as well as protecting individual buildings, trees and street furniture. It enables us to preserve and enhance a Conservation Area's character, environment and appearance, and to control and manage change.

Westgate-on-Sea has a number of conservation areas in which higher levels of protection is given (See map below). These policies cover aspects like the design and materials used in

order to be built in sympathy with the surrounding architecture. They are applied to all aspects of design including the doors, windows, porches and roofs of properties. The conservation areas also provide trees with more protection (See tree policy, WSNP15). For guidelines on the conservation areas please refer to the Conservation Area background document. For more details, please enquire with the local conservation Area Action Group (CAAG) and the TDC conservation officer.

WSNP7 Conservation areas

Development proposals within the designated Conservation Areas in the Plan area, as shown on Figure 13-1, or those which could have adverse impacts upon the character of the Conservation Areas by virtue of their proposed siting, design, use and potential impacts such as noise and traffic generation, will be considered in accordance with the relevant policies in this plan and those in the adopted Thanet Local Plan, to ensure that the character and setting of the Conservation Areas is protected.



Figure 13-1 Conservation Areas in Westgate-on-Sea © Crown copyright Ordnance Survey 100018261. Reproduced by Westgate-on-Sea Town Council under PGSA licence number 100058504

13.2 Heritage assets

The Town Council is encouraged under the NPPF to prepare a list of heritage assets. This list includes buildings and other structures or features that are not currently listed but do make an important contribution to the character of the Westgate-on-Sea Neighbourhood Development Plan Area.



Figure 13-2 Town Hall Westgate

Work on the local heritage assets list began in 2015 when the Westgate-on-Sea Conservation Area Advisory Group (CAAG), and with the support of local historians (e.g., James Brazier and Dr Dawn Crouch) and the Westgate-on-Sea Heritage Centre, created an initial list of local heritage assets (See separate background document which lists the heritage assets, the intention is to consult on this list in parallel with the Regulation 14 pre-submission consultation).

The Town Council places great importance in the retention of local heritage assets as they are a finite resource which form part of its rich built heritage. Therefore, although buildings and assets on the local list do not enjoy the full protection of statutory listing, they will be rigorously protected due to their important contribution to local character and sense of place.

Proposals for development that affect non-designated historic assets should fully consider the scale of any harm or loss to the overall conservation of local assets, keeping in mind their significance as set out in the NPPF 2021.

WSNP8 Local heritage assets

Planning permission will not be supported for development resulting in the loss of existing buildings or structures on the Local List of heritage assets. Alterations, extensions or other development which would adversely affect the appearance or setting of such buildings or structures will also not be supported. The Town Council will however make exceptions for renewable energy installations e.g., roof solar pv and air source heat pumps on a case-by-case basis, supporting the installation of these wherever possible.

Details of the designated Historic Assets and the non-designated Heritage Assets within the Plan area are contained in the supporting documents to this Plan entitled 'Westgate-on-Sea Designated Historic Assets' and 'Westgate-on-Sea Local List of Undesignated Heritage Assets'.

KEY to Heritage Buildings

- 1 St Saviour's Church, Westgate Bay Avenue *
- 2 Former Tower House, Adrian Square
- 3 Town Hall Buildings, St Mildred's Road *
- 4 Christ Church (now United Reform Church), Westgate Bay Avenue
- 5 Essex Road Cottages
- 6 Sussex Mansions, Sussex Gardens
- 7 Row of Shops, Station Road
- 8 Streete Court Cottages
- 9 Lymington Road Recreation Ground (Westgate's original WWI Memorial)
- 10 Row of Cottages, Quex Road (Lewis Cottages)
- 11 Jackson's Stables sign, Station Road
- 12 War Memorial, Sea Road *
- 13 Public Shelter, Upper Promenade, West Bay
- 14 Row of Shops, Station Road
- 15 *St Clement's*, St Clement's Road
- 16 *Osborne House*, Sea Road
- 17 *Exbury*, Sea Road *
- 18 *Forest House*, Westgate Bay Avenue
- 19 *The Observatory*, 99 Sea Road *
- 20 *Bertha Cottage*, Old Boundary Road
- 21 *Waterside*, 61 Sea Road *
- 22 *Ellingham*, St Clement's Road *
- 23 *The Observatory* date-stone, 99 Sea Road
- 24 Former Waterworks Cottages, Linksfield Road

*** Grade II Listed Building**

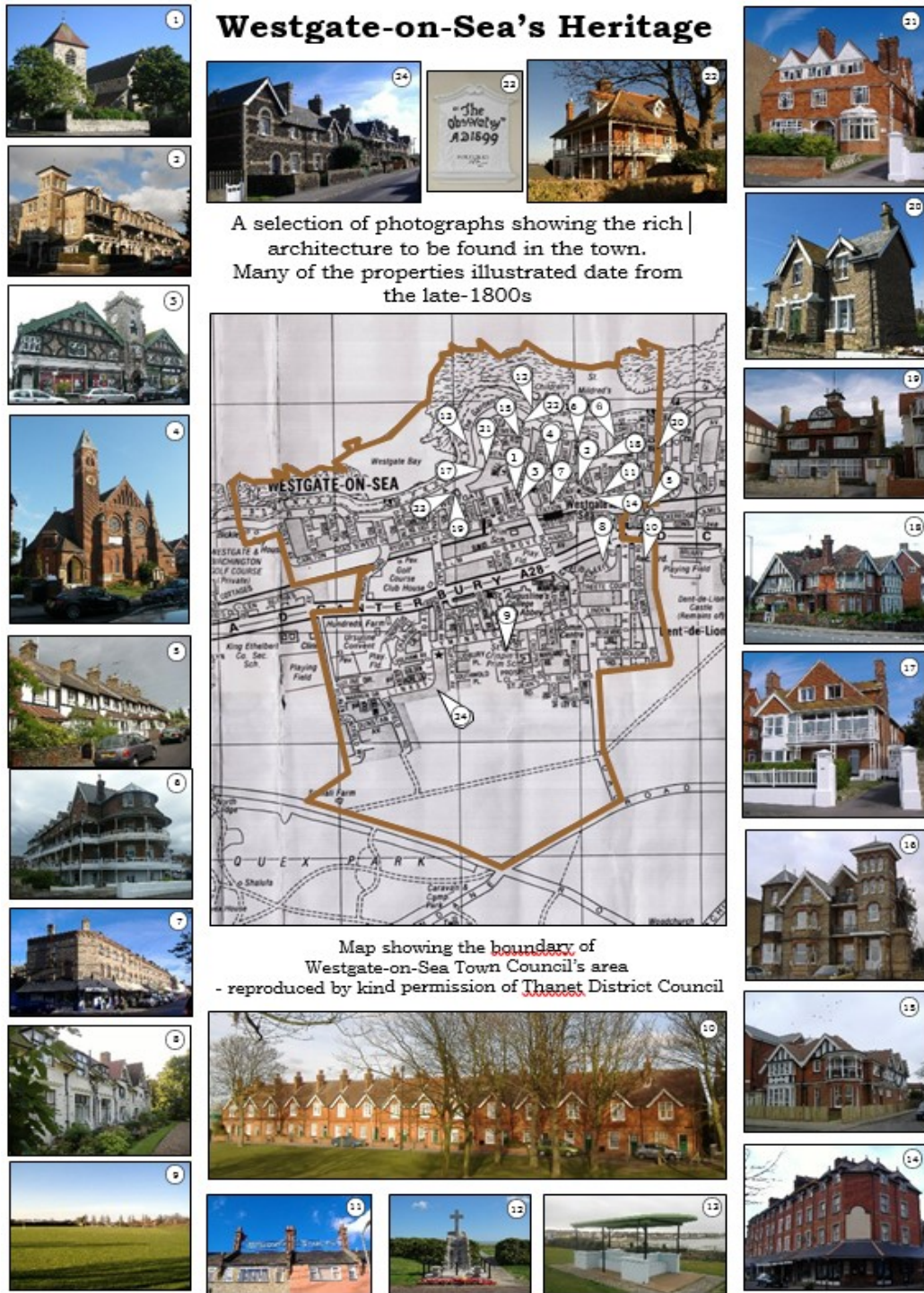


Figure 13-3 Heritage map produced by Cllr Joanna Cornford

13.3 Protection of scheduled ancient monuments

Although not within the Westgate NP Development Area, Dent de Lion is a Grade 2 Scheduled Ancient monument within the allocation for 2000 houses. Also, a relatively unknown ancient monument is in the boundaries on Westgate near to Somali Farm shop called Quex Park Settlements. These allocations can be seen on the following map.

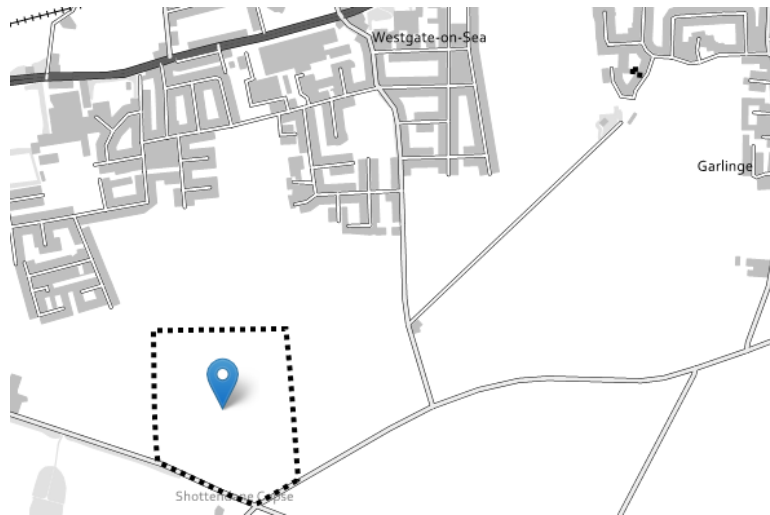


Figure 13-4 Scheduled Ancient Monuments, Left hand side: Quex Park Settlements, Right hand side black dots is Dent de Lion. © Crown copyright Ordnance Survey 100018261.

Dent de Lion is an important feature on the landscape of Garlinge and more details can be found in the Dent de Lion background document. The map below from 1763 with few landmarks on the Westgate and Garlinge area apart from Dent de Lion (Dandelion) showing the age and importance of this site.

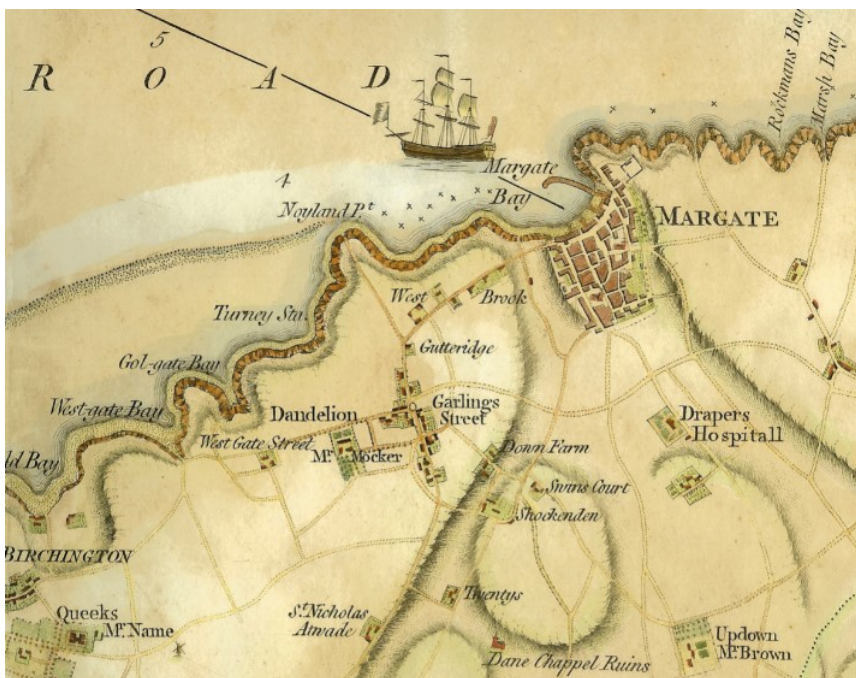


Figure 13-5 1763 map of Westgate and Garlinge area with Dent de Lion (Dandelion) marked.

Quex Park Settlements is thought to be an underground Romano- British settlement. These ancient monuments and their settings are protected by their status as Schedule Ancient Monuments by National Heritage. The NPPF states that as heritage assets are irreplaceable any harm or loss should require clear and convincing justification.

WSNP9 Protection of scheduled ancient monuments

The Town Council will not support proposals which would cause detrimental impact to Scheduled Ancient Monuments. All planning applications for development which may affect the site or setting of a Scheduled Ancient Monument will be required to include a Heritage Impact Assessment.

14 RESPONDING TO THE CLIMATE CRISIS

14.1 Low carbon and future looking developments with renewable energy

Globally, greenhouse gases such as CO₂ are increasing mainly due to burning fossil fuels for energy and transport e.g., gas for gas boilers, petrol and diesel for cars. This is causing our climate to warm and the frequency of heat waves and floods to increase.

There is clear evidence to show that climate change is happening. Measurements show that the average temperature at the Earth's surface has risen by about 1°C since the pre-industrial period. 17 of the 18 warmest years on record have occurred in the 21st century and each of the last 3 decades have been hotter than the previous one⁵.

The Town Council would like to encourage developers to use low carbon materials and to install high grade insulation, reducing energy wastage and therefore energy needs for the householder. Since the introduction of Energy Performance Certificates (EPC) in 2007, the district is still only achieving low levels of A to C energy efficiency in new builds for example, 0.4% of EPCs lodged in 2016 achieving an "A" energy rating, 7% achieving EPC rating B and 22% achieving energy rating C⁶. We would like to see excellent energy efficiency in any new builds in Westgate.

We would also like to encourage renewable energies to become a standard integral feature of housing developments including

- 1) air source or ground source heat pumps which remove the need of fossil fuel gas boilers and use small amounts of electricity to warm a house.

⁵ <https://www.gov.uk/guidance/climate-change-explained>

⁶ Source: <https://www.gov.uk/government/statistical-data-sets/live-tables-onenergy-performance-of-buildings-certificates> in The Draft Local Plan: <https://www.thanet.gov.uk/wp-content/uploads/2018/11/CD1.1-Draft-Thanet-Local-Plan-Reg-19.pdf>.

- 2) Solar pv which will help provide the electricity for the air source heat pump and reduce reliance on grid electricity

Not only do these measures reduce the reliance on fossil fuels which produce greenhouse gases but also reduces energy cost for the householder, reducing fuel poverty.

Sustainable transport and connectivity are extremely important in any new development. New developments should provide new and usable walking routes and links to the existing Public Rights of Way network. Kent County Council policy currently seeks to improve and upgrade the existing PRow network where it links with amenities, public transport nodes, work and education to increase the attractiveness of Active Travel and support modal shift and Westgate Town Council support this approach to sustainable travel.

Regarding emissions from transport, it is encouraging to see in the Local Plan that developments of ten units or more are required to add electric car charging points. Sales of new petrol and diesel cars will be phased out by 2030 and all new cars and vans will be zero emissions by 2035. This is coupled with the drive towards sustainable travel, including cycling and walking, which will be included in the Westgate-on-Sea Highway Improvement Plan moving forward.

An exciting prospect for homeowners with drives is the use of roof solar electricity production which can charge their electric car, allowing travel to become truly carbon neutral. We would like developers to consider installing such a set up as a standard feature of the homes.

Another feature of design that assists energy efficiency is the use of passive solar; orienting the housing in a way that enables cooling in the summer and warmth in the winter. This is particularly important as the UK is due to suffer more heat waves in the next decade.

WSNP10 Low carbon development with renewable energies

Development that incorporates low carbon materials, insulation that is of good quality in the walls, floor, roofs and windows, installation of renewable energy technology such as air source or ground source heat pumps and solar pv and intelligent orientation for heating and cooling will be supported by the Town Council.

New buildings in the Plan area should be designed in accordance with the Building Regulations and should seek to incorporate the highest standards of energy efficiency.

14.2 Surface water flood risk in Westgate-on-Sea

There have been flooding events in Westgate caused by excess surface water. This has occurred during heavy rainfall due to run off from the agricultural land and along roads such as Belmont Road, Quex Road, Victoria Avenue and Mordaunt Ave and Elm Grove and around Streete Court Road. Residents and the Town council are concerned that if this can occur over good quality soil, then the risk could increase when the area is concreted over.

The government has put in place good sustainable drainage (SUDS) standards and ensure that developers take surface water flood risk into account, however, the on-going maintenance of the sustainable drainage systems are of concern. The Town council would like to see a plan that ensures that SUDs are used in areas at risk of surface water flooding and that there is a plan around who will maintain and clean these areas so they remain permeable to water.

This is particularly important as climate change will increase the likelihood of heavy rainfall and flash floods.

WSNP11 Surface water flood risk areas

Planning applications in areas with an identified risk of flooding will only be supported if they contain a full surface water flood risk assessment, surface water drainage and mitigation report proportional to the location and scale of the development, including how the sustainable drainage systems employed will be maintained and will be fit for purpose in the future, especially during more intense rainfall caused by climate change.

***This NDP does not set specific criteria on what is required in terms of the contents of the report on surface water flood risk, surface water drainage and mitigation. But all new residential development in Flood Zone 2 and 3 and any new development over ten dwellings in Flood Zone 1 would need to provide it.**

Advice on flood risk and the preparation of flood risk assessments is contained in Planning Practice Guidance (PPG) at <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

15 GREEN AND OPEN SPACES

15.1 Local green spaces

It is very important that green spaces within Westgate-on-Sea are protected. Many spaces in the town did not have a specific designation and so it was important that this was addressed so that they can be conserved for future residents and visitors to enjoy. During the 2017 Local Plan consultation and the 2021 call for sites, TDC invited the Town



Figure 15-1 Recreation ground

Council to submit areas for consideration as Local Green Spaces. Each space should 1) be in reasonable proximity to the community it serves and 2) be demonstrably special to a local community and hold a particular local significance because of its beauty, historical significance, recreational value, tranquillity or richness of wildlife. However, it cannot be an extensive tract of land. The list of open spaces proposed by the town council is shown in the table below. All of these areas were accepted within the TDC Local Plan and are shown in the map below.

Table 15-1 Local green space allocation in Westgate-on-Sea

Recreation Ground	Lymington Road, Westgate-on-Sea, CT8 8ER
Community Green	Lymington Road, Westgate-on-Sea, CT8 8ER
Open Space	Victoria Avenue, Westgate-on-Sea CT8 8BJ
Open Space	Adrian Square, Westgate-on-Sea CT8 8TE
Open Space	Ethelbert Square, Westgate-on-Sea, CT8 8SR

WSNP12 Designation of Local Green Spaces (LGS)

Development proposals in the designated Local Green Spaces listed in Table 15-1 will be managed in accordance with national policy for Green Belts.

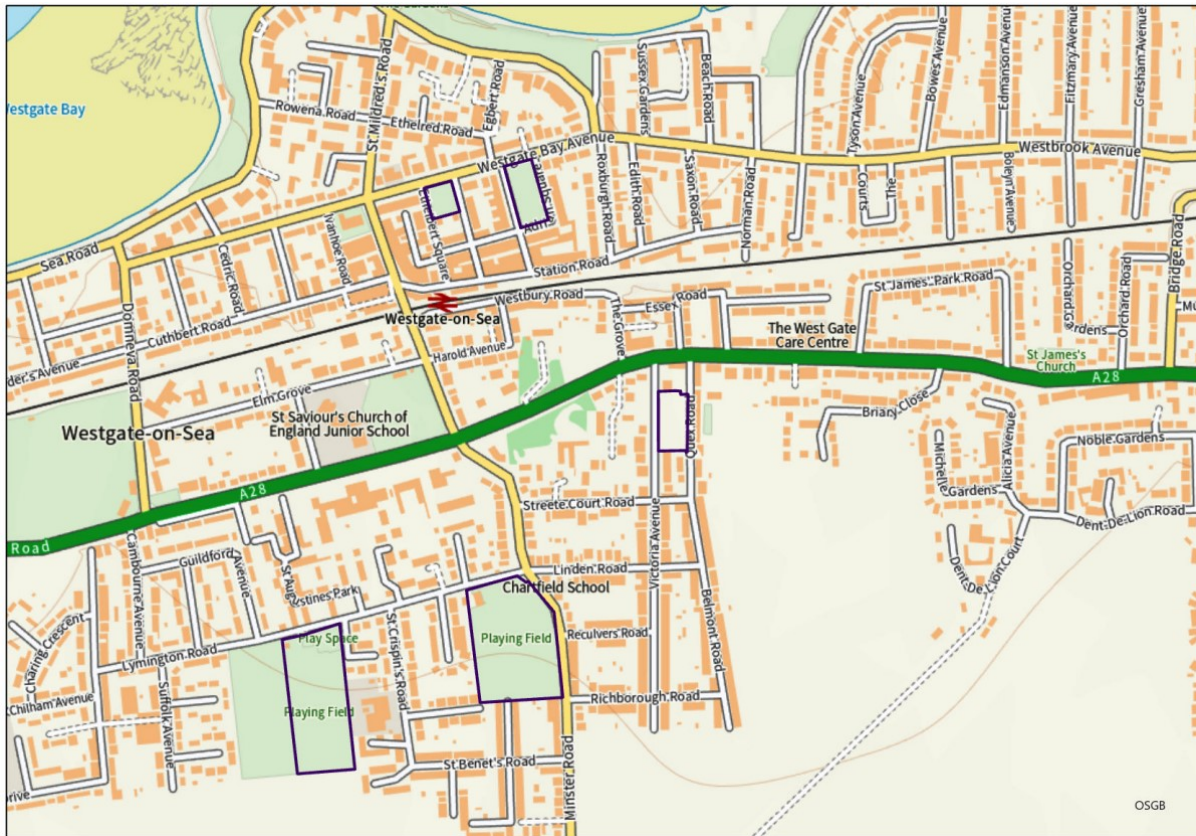


Figure 15-2 Map of local green spaces in Westgate-on-Sea© Crown copyright Ordnance Survey 100018261 Reproduced by Westgate-on-Sea Town Council under PGSA licence number 100058504

15.2 Green wedge

The coastal towns of Thanet are separated by three particularly important areas of open countryside which are known as the Green Wedges indicated in the figure below.

The principal functions of and stated policy aims for Thanet's Green Wedges are:

- Protect areas of open countryside between the towns from the extension of isolated groups of houses or other development.
- Ensure physical separation and avoid coalescence of the towns, retaining their individual character and distinctiveness.
- Conserve, protect and enhance the essentially rural and unspoilt character, and distinctive landscape qualities of the countryside that separates the urban areas, for the enjoyment and amenity of those living in, and visiting, Thanet.

- Increase access and usability without compromising the integrity of the Green Wedges.

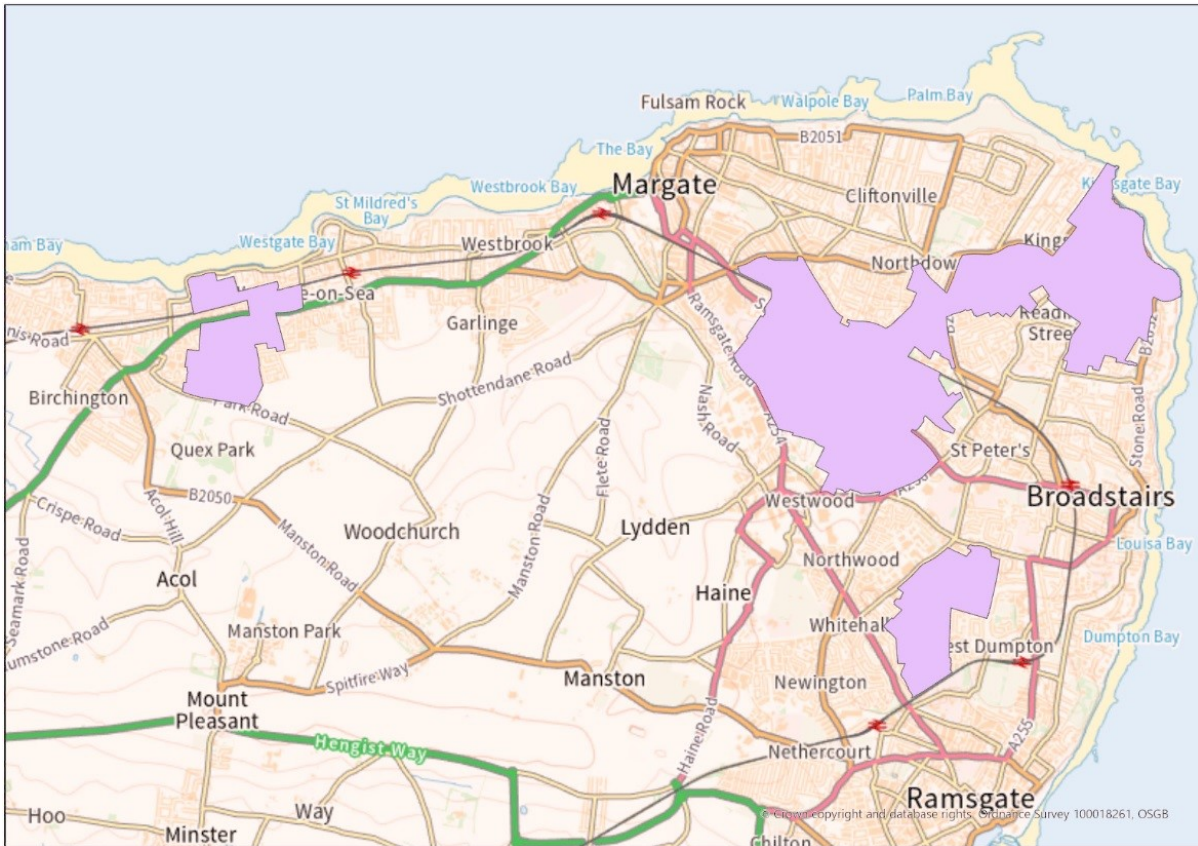


Figure 15-3 Thanet's Green Wedges. © Crown copyright Ordnance Survey 100018261 Reproduced by Westgate-on-Sea Town Council under PGSA licence number 100058504

WSNP13 The Green Wedge

Within the defined Green Wedge as shown on Figure 15-3, priority will be given to protecting the countryside from built development and ensuring that the physical separation and coalescence of the Thanet Towns is avoided.

Within the Green Wedges new development (including changes of use) will not be supported unless it can be demonstrated that the development is:

- 1) not detrimental or contrary to the stated aims of the policy; or**
- 2) essential for the proposed development to be located within the Green Wedge.**

There is a green wedge between Westgate and Birchington. It takes in The Westgate and Birchington Golf Club to the North and Quex agricultural land and Kind Ethelbert's schools playing field to the South.



Figure 15-4 Westgate and Birchington Golf club, land part of the green wedge.

The Town Council considers it was remiss of Thanet District Council not to have recognised that the agricultural land between Westgate and Garlinge is effectively a Green Wedge which

should be recognised in the same way as the Green Wedges in South Thanet (which do not transverse the land all the way to the seafront). The allocation of 2000 houses will effectively join Westgate and Garlinge and the physical separation between the two distinct areas will be lost.

15.3 Protection of prime agricultural land

Westgate-on-Sea has some of the best agricultural soil in the country, being classed the best and most versatile agricultural land (grade 2). Many residents have a connection to this land, either through family members working the land or through the wonderful views taken in whilst walking, cycling or even riding horses along the footpaths and bridle ways which transect the farmland. The NPPF sets out that the best and most versatile agricultural land should only be used as a last resort and low-quality land should be used first.

“The National Planning Policy Framework expects local planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land. This is particularly important in plan making when decisions are made on which land should be allocated for development. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality”⁷

The Town Council will also not accept the loss of agricultural land south of allocated area within the Westgate NP area.

⁷ <https://www.gov.uk/guidance/natural-environment#brownfield-land-soils-and-agricultural-land>

WSNP14 Building on the best and most versatile agricultural land

Proposals for development on land classified as the best and most versatile agricultural land, other than that covered by site allocations contained in the adopted Thanet Local Plan, will not be supported by the Town Council.

16 BIODIVERSITY

16.1 Trees

Trees are a vital part of Westgate-on-Sea and contribute significantly to the character and appearance of the local landscape. Not only are they visually pleasing but they are the lungs of our town. Many trees in Westgate are within the conservation area and as such have higher levels of protection. Any cutting or removal of these trees needs planning permission. If the trees in a conservation area do not already have a Tree Protection Order, then one can be requested if an application to remove these are made.

The Town Council will also promote to residents the value of retaining the trees in their gardens (outside of conservation areas) and will promote the provision of additional appropriate trees in the town and within new developments.

WSNP15 Protecting and promoting trees

Applications for the removal of protected trees will not be supported unless they are shown to be a hazard.

Applications for planning permission on sites where the proposal includes the retention of all viable existing trees will be supported, as long as they meet the criteria of other policies within this Plan. The provision of additional, suitable trees on new planning applications will be supported.

16.2 Protection of wildlife and biodiversity

Resident feedback highlights how important the presence of wildlife and nature is to the local area of Westgate and how this plethora of fauna and flora creates a sense of place and peace and harmony for the residents. Many local people that look onto the agricultural fields are delighted to regularly see bats in their gardens during the summer months and do not want the development to disturb these protected species.

Local known species include, foxes, slow worms, bats and various species of farmland birds including lapwings and skylarks that make the land their home. Furthermore, the land set

aside for nature around the perimeter of the farmland and along the footpaths provide a variety of wildflowers for pollinators such as bees and butterflies, which are under threat at present from a worldwide reduction in biodiversity.

It is therefore important to not only protect existing species but enhance their numbers wherever possible. For example, the Town Council will encourage the improvement in the biodiversity of an area through use of wildflower areas, foraging areas, allotments, woodland areas and the planting of seeds for pollinators. The planting of wildflowers/plants for pollinators along road verges, on roundabouts and in greenspaces will be encouraged.

WSNP16 Protection of protected species and biodiversity

The Town Council will only support development proposals in the Plan area if a survey of the existing wildlife and wildlife habitats present on the site has been undertaken, and the proposals include appropriate measures to ensure that any protected species and their habitats are fully protected. In accordance with the Environment Act 2021, proposals will need to include a Biodiversity Net Gain (BNG) requirement of at least 10% above the baseline position.

17 FACILITIES

17.1 Community assets

Westgate-on-Sea has a variety of community assets including a library, a community centre and various meeting places. These are important as they contribute to the social well-being of the area. Planning applications for new community facilities will be encouraged and the loss of any facility would be seen as a last resort.



Figure 17-1 Bake n Ale House and United Services Club

Community facilities can also be allocated as Assets of Community Value (ACV) with TDC. These are identified as buildings or land deemed to be of community value and full guidelines are set out in Section 88 of the Localism Act 2011. Once the building or piece of land has been listed as an ACV, the community can start the Community Right to Bid Process, which enables the community to take ownership of the asset. In the Westgate-on-Sea Neighbourhood Area there are two listed ACVs: The Westgate Pavilion and The Walmer Castle Public House. A full

list of ACVs in Thanet can be found on their website⁸. The designation of Assets of Community Value will be encouraged to enable the protection of community facilities.



Figure 17-2 The Westgate Pavilion

WSNP17 Safeguarding community facilities

Existing community facilities or those gaining planning permission for such use will be safeguarded from other prejudicial development on or adjacent to the site.

Where it is demonstrated that a community facility is no longer viable, then planning applications for change of use or redevelopment will only be considered if they are supported by an assessment which sets out why the current community use and potential alternative community uses are no longer viable or appropriate on the site.

17.2 Infrastructure of Westgate-on-Sea

Many residents are concerned about the effect of the houses on the infrastructure of the area. It is the view of the Town Council that the transport plan was not written in conjunction with the planned houses. The new inner circuit road has also been a mystery to many and the transportation consultation also went under the radar of the Town Council and others.

It is imperative that if the houses do go ahead, they must not put unsustainable pressure on our roads in the area, in particular, Minster Road which travels from North- South from Canterbury Road to Shottendane Road. Many children cross this road to go to school and is dangerous at present, without the added pressure from additional cars associated with the development. Garlinge residents are also very concerned about their very narrow High Street.

^{8 8} <https://www.thanet.gov.uk/publications/community-development/assets-of-community-value-for-listing/>.

The provision of doctors and dentists is also a concern and this must be addressed in the developer's plan. The provision of water and proper sewerage system is a concern for residents and Southern Water. Given the fact that Southern Water cannot cope if there is heavy rainfall this is very worrying. If the development goes ahead these issues must be addressed.

WSNP18 Provision of Infrastructure

Proposals for new development in the Plan area should make provision for supporting infrastructure which is;

- a) Necessary to make the development acceptable in planning terms**
- b) Directly related to the development**
- c) Fairly and reasonably related in scale and kind to the development.**

17.3 Developer Contributions

Development contributions are based on the principle that developers should, where necessary, provide appropriate mitigation for developments brought forward, including where additional infrastructure is required to support the development. Specifically, contributions can only be sought and secured in order to satisfactorily address the direct impacts of new development upon infrastructure provision.

The Town and Country Planning Act 1990 enables developer contributions to be secured through Section 106 Agreements, and the Planning Act 2008 and accompanying Community Infrastructure Levy (CIL) Regulations provide the legislative framework for the introduction of the CIL, although it has not yet been introduced in the Thanet District Council area. It is a locally determined levy on various types of new development calculated on the amount of new floorspace.

At the present time, the District Council continues to secure infrastructure requirements and other planning obligations, such as affordable housing provision, through Section 106 Agreements.

The Plan area, through the adopted Thanet Local Plan, includes a strategic housing site allocation (Policy SP17) which will deliver a large amount of new residential development during the Plan period. It is expected that Section 106 Agreements will be negotiated as part of planning permissions granted by the District Council for this development in order to

secure the supporting infrastructure and other planning obligations that will be necessary to ensure that the development is acceptable in planning terms.

The Town Council considers that it will be important to address the direct impacts of the proposed new development upon the local area, particularly upon the existing transport and community infrastructure within the Plan area. The Town Council will liaise with the District Council to ensure that such impacts are fully addressed in the assessment of planning applications and that, where necessary, developer contributions are sought through Section 106 Agreements to mitigate any direct impacts upon infrastructure provision in the Plan area that are identified. Furthermore, the Town Council considers that it will be important to achieve the long-term cohesion of both the existing and new communities within the Plan area, and that any necessary investment in community infrastructure to support this key objective should be recognised. On this basis, Appendix 1 lists four projects that it considers should be assessed for potential developer contributions, as part of Section 106 Agreements, linked to the planned growth of the town over the Plan period.

WSNP19 Developer Contributions

Developer contributions that are secured through the grant of planning permissions in the Plan area for the provision of new and improved infrastructure should, if appropriate, include the projects listed at Appendix 1 in this Plan.

18 NEW DEVELOPMENTS: The houses allocated on the agricultural land in Westgate and Garlinge.

The TDC allocation for the 2000 houses is shown below within the dotted red line. The full district policy setting out the strategic proposals for this site are set out in policy SP17 of the TDC Local Plan, which has been reproduced in Appendix 2 of this NP.

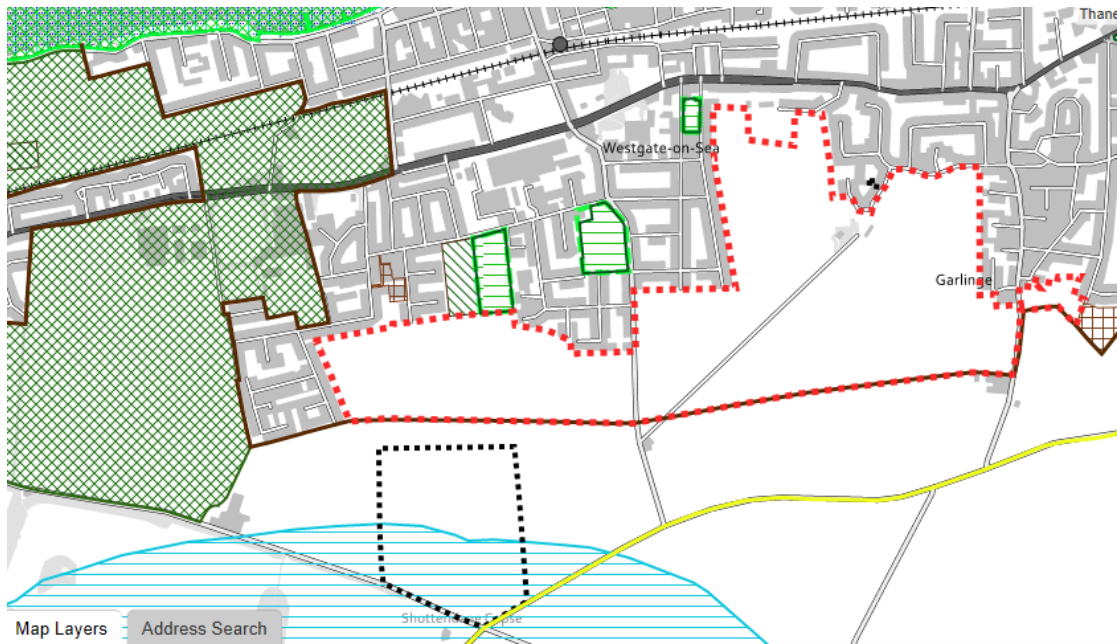


Figure 18-1 2000 house allocation at Westgate and Garlinge (red line) © Crown copyright 2018 Ordnance Survey 100018261.

The housing trajectory and delivery rate of the new development is set in Figure 17.2 below:

Site Address	Total units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026/ 27	2027/ 28	2028 /29	2029 /30	2030/ 31	2031/ 32
STRATEGIC SITES														
Westgate Policy SP15	2000	0	25	75	100	150	200	250	250	250	250	250	200	

Figure 18-2 Copied from Appendix B TDC Local Plan

The Neighbourhood Plan objectives regarding the new development are listed below:

- To ensure that the development is of high standard and has green infrastructure throughout (WSNP3).
- To ensure that the development has an appropriate mix of houses to cater for all ages within Westgate, including affordable housing (at least 30%) and housing for the elderly to down-size to, with some social and health care included.
- To ensure that flood risk is addressed (WSNP11).
- To ensure that trees, biodiversity and wildlife are protected on the allocations (WSNP15 and 16).
- To ensure the protection of historical sites within the Local Plan allocation area (see WSNP8 and 9).
- To ensure housing will be highly energy efficient, incorporating low carbon or carbon zero options and renewable energy e.g., air source heat pumps and solar pv (WSNP10).

In order to deliver these objectives a statement in the form of policy WSNP21 has been drafted setting out the position of the Town Council.

WSNP20 POLICY STATEMENT - The houses allocated on the agricultural land in Westgate and Garlinge

Development of the site known as SP17 in the adopted Thanet Local Plan will only be supported by the Town Council, if it meets all the requirements set out in this Plan.

In furtherance to this, development should be high-quality, well-designed and respond to the Westgate-on-Sea town development boundary, ensuring a complementary and considerate boundary transition between the existing and new development. Specifically, the siting and design of new-build development should not impact on the residential amenity of existing residents.

To promote a cohesive town, the Town Council will support designs that will facilitate social interaction, healthy inclusive communities and promote green links and infrastructure through and out of the development to the existing built environs of the Westgate-on-Sea community.

19 COMMUNITY ACTIONS

Those actions that do not come under planning law but are deemed to be of importance to the town are listed below.

19.1 Extensive improvements to the Westgate-on-Sea Railway Station

Westgate-on-Sea Town Council agreed a large-scale improvement plan to the Westgate-on-Sea Train Station in conjunction with Southeastern and Network Rail. The plan was undertaken in three parts with the first part of the three-part improvement plan completed in 2019.

The initial investment totalled £125,000 which was part of a £1,250,000 investment to happen over a two-year period. The initial works included the opening of a new waiting room on the London bound platform 1, new raised bedding areas created with railways sleepers, improved seating areas, the addition of new lighting, new bins, new



Figure 19-1 Westgate Railway Station

community notice boards, all areas of plant overgrowth cut back and cleared, repointing and fixing of brick walls and the station weeded and deep cleaned. The bridge was also replaced by a new modern one.

As part of the first stage The Bumblebee Conservation Trust agreed to sponsor the replanting of the station with wildflowers which as well as looking beautiful will encourage wildlife back to the area including, we hope, the endangered Shril Carder Bee. The work was carried out by local volunteers and community groups.

Discussions are on-going about adding more stopping services to the station however these changes need to be planned two years in advance.

19.2 Community Asset Transfers

The Community Asset transfers for the War Memorial Recreation Ground on Lymington Road have now completed with the transfer of ownership passing to the Town from Thanet District Council.

This is a great opportunity for the community of Westgate-on-Sea to learn and appreciate the benefits of community ownership and shape the future of the site. We aim to encourage local people of all ages, abilities and interests to come along and get involved. This is an amazing time to strengthen community cohesion and to promote sustainable living and learn new skills.

Of course, with ownership comes responsibility and the Town Council would like to invite volunteers in the community to contact us as we want to undertake renovation works to improve the facilities and utilise them to their full potential.

The Town Council will be carrying out consultation opportunities later in 2021 and would urge all residents to get involved; the draft proposals for the site are hoped to enhance the landscape, improve biodiversity and renovate the facilities. We want to have a multi-use facility that will include football matches, coaching opportunities for young people, a functional skate park and an improved play area for mothers and toddlers.

19.3 Planting in Westgate

Westgate-on-Sea Town Council are planning to improve and update green spaces in Westgate. Plans have already covered the replanting of Westgate-on-Sea Train station with wildflowers and the addition of new beds, both War Memorials will have redeveloped gardens and contemplation areas, Lymington Road Recreation Ground will have the addition of new Trees and planting, Sea Road will be given a fresh lease of life creating more attractive sheltered spaces using trees and plants making it a nice alternative spot next to the beach. The Town Council entered the South & South-East In Bloom competition in 2019 and each year since then.

In December 2018 Cllr Robert Micallef and local resident Denise Packer started the project by planting over 1250 Spring Flowering bulbs in Lymington Recreation Ground, Community Centre Green and the planters within the Town Centre. Cllr Dr Hannah Scott then organised a tree planting day in 2019 and more trees and planting are to come through the work of our Town Clerk Gill Gray and volunteers.



Figure 19-2 Wildflowers

Donations so far include:

TCV & OVO Energy have donated trees and hedgerows.

The Bumblebee Conservation Trust have donated 7kg in Poppy and Wildflower seeds.

TDC have supported the planting along Sea Road.

Woodland Trust have donated more trees.

Grow Wild have donated packets of seeds.

B&Q, Homebase and Thompson Morgan donated spring flowering bulbs.

£10,000 from Lottery Funding for Westgate in Bloom for 3-years.

19.4 Westgate Day

The Town Anniversary has been created by Cllr Helen Page along with our Town Clerk Gill Gray to acknowledge Westgate as a unique town, its history, culture and environment. The date, 18th July, was agreed through discussion with Dr Dawn Crouch, Curator of Westgate Heritage Centre. It links to the historical year 1870 when the Westgate estate blossomed and the first three digits 187 were taken and agreed on 18th July. The Westgate Estate was formed from the amalgamation of four previous estates. Charles Nightingale Beazley (a London architect) was appointed Estate Architect in 1870 and that was the year that he produced his plan for the layout of Westgate's roads.

Aims

- To bring attention and focus to the history of the Town, its people and achievements.
- To create a sense of pride and belonging for all who live in Westgate.
- Long term: through education of our young people, create a sense of ownership and responsibility for their town.
- Involve the local community (individuals, businesses, organisations)
- Engender: Pride; Respect; Sense of Community; Good Standards.

In the first year, 2019, there were two aspects to this:

1. Schools participated in Westgate-related project work leading up to the Anniversary with prize-giving. Project themes were: History & Heritage; Art & Creativity; Environment & Coast; Writing & Poetry. There was also an inter-generational project joining St Michael's care home and young people.

2. A celebration day on the following Sunday started on 21st July 2019 with entertainment, fun and food/ refreshments involving local people and businesses along Sea Road (roughly opposite The Swan pub and along to opposite Westcliff House) and the squares. In the future the Lymington Green is proposed to be used when the Town Council can obtain permission from TDC.

The Town Council aims for it to be a great event every year, post Covid.

In 2021 a Town Council sub-committee was formed to engage with local groups and facilitate local events for the benefit of everyone.



Figure 19-3 Sea Road, Westgate

19.5 Speed of traffic

Speeding of traffic along roads such as Sea Road, Westgate Bay Avenue, St Mildred's Road and Minster Road was a cause for concern for many residents in the Community Survey.

CA1 Speeding Traffic

Westgate-on-Sea Town Council have been conducting a Speed Watch Campaign led by Cllr Matthew Scott and Gill Gray, the Town Clerk. The Town Council have purchased one Speed Indicator Device and are enlisting the support of resident volunteers who will be trained. The information gathered by these cameras can be used in prosecution and therefore the scheme hopes to greatly reduce the speed along the roads of Westgate-on-Sea.

19.6 Speed of cyclists along the promenade

There have been a number of complaints about the speed at which cyclists travel along the promenade in front of the beach huts at West Bay. It may be possible to extend the By-laws to ensure that cyclists dismount in front of the beach huts all along the West Bay promenade to prevent possible injury to pedestrians.

CA2 West Bay promenade by law extension

The WTC will continue to work with TDC regarding the extension of the By-laws to investigate the possibility of cyclists dismounting in front of all of the beach huts along West Bay.

19.7 Traffic control around the schools

Residents stated that they were concerned about the traffic control around the schools e.g., St Crispin's school.

CA3 Traffic control around schools

WTC will continue to work with TDC and KCC to ensure the safety of school children is improved around and in the vicinity of the schools in Westgate-on-Sea. WTC will continue to communicate with KCC regarding a possible crossing and/or traffic slowing along Minster Road.

19.8 Litter

The prevalence of litter on our streets and the lack of bins were also of concern to residents.



Figure 19-4 Full litter bins

CA4 Cleaning of Westgate by the Town Council and residents

The Town Council have employed three part time cleansing operatives to enhance the cleaning of the town. They have also installed fourteen and then a further seven new Westgate-on-Sea Town Council bins in the town which the cleansing operatives empty on a regular basis.

Some residents take an extra carrier bag with them when they go for a walk and collect rubbish as they go, which is an excellent example of our community spirit in Westgate.

WTC will continue to communicate with TDC to ensure that the town always has TDC cleaners as well as the WTC cleaning operatives.

WTC will also investigate a water bottle filling scheme where local business sign up to allow residents and visitors to fill up their re-useable water bottles, to reduce the number of plastic bottles in the town.

19.9 Dogs Fouling

A further concern of residents was dog faeces. Some residents wanted more bins and others wanted more enforcement. Dog poo can be disposed of in the fourteen new bins that WTC

added in 2018 and the further seven added in 2020, so it is hoped that the prevalence of dog faeces will be reduced. Other actions are below:

CA5 Dogs Fouling action

WTC encourages TDC to send FIDO – the dog fouling cleaning machine to Westgate-on-Sea as often as possible.

WTC would like to work with the children in the local schools in the future to produce posters for the town on the issue of litter and dog fouling.

19.10 Protecting historical aspects of Westgate-on-Sea

A high percentage of residents felt that it was very important to protect and restore the heritage of Westgate-on-Sea. Recently, the Town Council has investigated funding streams in order to possibly restore the High Street Canopies.

CA6 Heritage

WTC will continue to investigate funding streams to restore the Town's canopies.

WTC will work with local interest groups such as CAAG and The Westgate Heritage Centre to ensure sites are protected.

19.11 Things to do in Westgate

The residents have explained in the Community Survey that they would like to see more things to do in Westgate, especially in the evening.

CA7 Things to do in Westgate

WTC will aim to create a town that businesses want to come to by protecting the town centre and enhancing the cleanliness in the town and on the beach. Recently, Millie's Bar on the Seafront has opened, the Walmer Castle has been converted into a Greek Restaurant and a café/sandwich bar called Bethanys has opened on Lymington Road. The Westgate Bay Café has been renovated to create a high-quality seafood restaurant with sea and sunset views called Finbars. Paul's bar and The Swan have also recently been refurbished and a new Pizza restaurant has opened in the High Street. Ginger's, the Gin Bar has also had a make-over and is a classy evening venue. Therefore, the opportunities for residents in the evenings in Westgate are growing.

The Town Council has also initiated and supports a new Business Forum, which will enable local businesses to communicate and exchange ideas.

Residents can encourage businesses to come to the area by supporting the local shops.

19.12 Activities for young people

Our community surveys also revealed that residents felt that there should be more things for young people to do. The Town Council therefore helped to fund the local youth club at the Lymington Community Centre.

CA8 Activities for young people

The WTC would encourage local groups, especially those that run activities for teenagers to apply for WTC community grants. These are small funds of usually between £100 - £1000. WTC would also encourage local people to start new sports and activity clubs in Westgate and will give support to these groups.

20 Community Actions relating to the SP17 development

Many residents are concerned about the new development. One way in which the resident's voice can be heard is through the consultations that the developers will run. The Neighbourhood Plan Steering Group of the Town Council has raised the issues with the developers. Although the planning policies will apply, the finer details of the sites can be discussed with the developers through their consultation days.

CA9 New development: communication with the prospective developers.

The WTC will raise our concerns and the concerns of the residents with regards to the development (agricultural land, noise and design) and also encourage the developers to run communication days to ensure that the residents can voice their ideas and concerns.

20.1 Houses for local people

It is clear that many of the houses built in Thanet are for people moving into the area from places such as London, as has been the trend for hundreds of years. WTC is concerned that local people should be able to access the social housing first.

CA10 Houses for local people

The WTC will communicate with TDC regarding the social housing allocation in the 2000 house development. The general housing stock will be controlled by market forces and on the open market, however WTC would like to see the social housing being allocated to local – Westgate and Garlinge - people first.

20.2 Local Housing Needs Assessment

It is clear that the 2000 house allocation is to address the “objectively assessed housing need” of Thanet as a whole, rather than the need of the town. The TDC Local Plan Hearing in Public in 2019 showed that TDC views Thanet as one urban area and allocated the housing need according to the total need of the Island, rather than according to the need of each town. Westgate and Garlinge are therefore providing land for the housing need of Thanet rather than for the sustainable growth of their small towns. We believe that this is not the best way to allocate housing and that housing should be allocated according to each town’s needs. Otherwise, what is the point of localism and the neighbourhood plan process?

Therefore, in 2023 or earlier, a Local Housing Needs Assessment of Westgate-on-Sea will be undertaken by the Town Council to assist TDC in the design of the next Local Plan and allocations of any strategic housing sites. This will also assist the creation of the next NP from 2031 – 2051 with the aim to prevent what the Town Council deems as over- development in the town.

CA11 Local Housing Needs Assessment

By 2024, a Local Housing Needs Assessment of Westgate-on-Sea will be funded by the Town Council which will assist the creation of the next NP 2031 – 2051.

At the TDC Local Plan Hearing in Public, it was clear that there was an appetite to move towards a Kent Plan or Southeast Plan rather than individual District Local Plans to address the objectively assessed housing need of Kent/South East. This would give a larger area and more variety of land to be chosen for houses instead of the agricultural dense land in Thanet. The Town Council would like to encourage this move by TDC and the government, as it will save some of Thanet’s agricultural land in the future, because according to the NPPF, grade one and two agricultural land should only be built on as a last resort.

20.3 Fields for food, not for houses

Throughout this process, it has been hard to accept that we seem to not have a say over this strategic allocation of 2000 houses, which is disproportional to size of Westgate and Garlinge and will destroy top grade agricultural land. We have and we will continue to lobby the government to change the law on building on top quality agricultural land. If the NPPF is not

changed then we could see the whole of the Isle of Thanet built on as there is no law to simply protect countryside.

CA12 Lobbying for a change in the law

WTC will continue to lobby government for a change in the law on building on agricultural law to protect our countryside for future generations.

21 Monitoring and reviewing

The NDP policies will be monitored by WTC and formally reviewed every five years to ensure that they continue to provide adequate policy coverage and are still relevant. This will partly be achieved by undertaking a town survey, which will assess if the policies and community projects are still relevant to the community. Future reviews of the Plan will take account of the emerging review of the Thanet Local Plan which will cover the period from 2031 up to 2040.

Through liaison with TDC planning department the NDP will be checked against emerging planning changes both at national and local levels. The monitoring criteria will be as follows:

POLICY	5-year outcome
WSNP1 Sustainable Development	In accordance with NPPF.
WSNP2 Protection of Seafront Character in the West Zone	No demolition for the building of blocks of flats or over-massing in the West Zone .
WSNP3 Design Guidelines	All new developments to have followed the Westgate-on-Sea design guidelines: Section 10.
WSNP4 Safeguarding leisure and tourism	No net loss of features that attract visitors to the area.
WSNP5 Protection of shopping areas	No net loss of business use classes to residential on the ground floor within the areas defined as shopping areas.
WSNP6 Retention of Employment space	No net loss of employment space in Westgate-on-Sea.
WSNP7 Conservation Areas	All planning applications submitted in the conservation areas should be detailed and follow the conservation area rulings.
WSNP8 Local Heritage Assets	No loss of local heritage assets. Appearance or setting of such buildings or structures not affected.
WSNP9 Protection of Scheduled Ancient Monuments	No loss of the setting of Dent de Lion or Quex Settlements. Full Historic assessment of relevant sites, mitigation strategies and plans produced.
WSNP10 Low carbon development with renewable energies	No development built with low energy efficiency.
WSNP11 Surface water flood risk	Full surface water flood risk assessment of relevant sites, mitigation strategies and maintenance plans produced.

WSNP12 Designation of Local Green Spaces (LGS)	No net loss of designated LGS.
WSNP13 The Green Wedge	No built development on the green wedge.
WSNP14 Building on the best and most versatile agricultural land	No increased number of houses on the best and most versatile land apart from that which is already allocated in the Local Plan.
WSNP15 Protecting and promoting trees	No net loss of trees with TPOs or within the conservation areas. Provision of new suitable trees within the new developments.
WSNP16 Protection of protected species and biodiversity	Full wildlife assessment of relevant sites, mitigation strategies and plans produced. No net loss of wildlife in Westgate-on-Sea and possible increase in biodiversity.
WSNP17 Safeguarding community facilities	No net loss of community facilities.
WSNP18 Provision of Infrastructure	No unsustainable increase in pressure on existing infrastructure.
WSNP19 Developer Contributions	Developer contributions secured through the granting of planning permission are, if appropriate, used towards the projects identified in Appendix 1.
WSNP20 Site Policy Statement	That the new development on land, allocated under policy SP17 of the Thanet Local Plan, meets the aspiration so the statement.

The community projects will be monitored each year against the aims and objectives of the Town Council.

22 Appendices

Appendix 1: Developer Contributions- Potential Projects

Projects identified by Westgate-on-Sea Town Council

Renovation and expansion of the Community Centre on Lymington Road, Westgate on Sea

Renovation of the Westgate Library building to sustain future and improvements to give access to the top floor for everyone

Improvements to Minster Road for pedestrians and vehicles

If viable, Section 106 monies to be used to support carbon neutral development

Appendix 2: Policy SP17 of Thanet Local Plan

Policy SP17 - Strategic Housing Site – Westgate-on-Sea

Land is allocated for up to 2,000 new dwellings with an approximate average density of 35 dwellings per hectare (net) at land to the east and west of Minster Road, Westgate-on-Sea.

Proposals will be judged and permitted only in accordance with masterplan for the whole site which should include:

- 1) a minimum of 16 ha of open space to include functional green space(s) between existing urban edge and new development;**
- 2) a fully serviced area of 2.05 ha (to be provided at the cost of the developer) to accommodate a new two-form entry primary school, and its construction in a location and in a form agreed with the County Council;**
- 3) a range of community facilities in accordance with Policy SP14, including small scale convenience retail provision to serve the day-to-day needs of the residents;**
- 4) provision of serviced 1 ha of land suitable for a new medical centre to cater for the additional needs created by the development;**
- 5) linkages to new and existing public transport infrastructure, including bus and rail services;**
- 6) vehicular access from Minster Road and Dent-de-Lion Road;**
- 7) the provision of a link road between Dent de Lion Road and Minster Road (including necessary junctions) and the provision of a new signal controlled junction at High Street Garlinge/A28;**
- 8) improvements at Dent-de-Lion Road/High Street, Garlinge junction;**
- 9) an assessment to identify necessary measures to manage on-street car parking in Dent-de-Lion Road and Garlinge High Street, between the site and the A28, and potential methods of delivery;**
- 10) the upgrade of Shottendane Road to Local Distributor standard; and**
- 11) a proportionate contribution to necessary off-site highway improvements in accordance with Policy SP47.**

Masterplanning will be informed by and address

- 1) an archaeological evaluation;**
- 2) the preservation and/or enhancement of the setting of scheduled ancient monuments and the listed Dent de Lion Gateway, and the measures to be undertaken;**
- 3) the capacity of any utility services and infrastructure and any need (and provision of) improved or additional infrastructure (as may be advised or reasonably required by service providers);**
- 4) appropriate arrangements for surface water management/sustainable drainage schemes in line with Margate Surface Water Management Plan,**
- 5) Landscape and Visual Impact Assessment to address any visual impact on views to and Thanet Local Plan Adopted July 2020 53 from the adjacent Green Wedge and protecting wide open landscapes and strategic views; and**
- 6) the integration of development and landscaping to take account of public rights of way and the provision of a soft edge between the site and open countryside.**

All development proposals must be planned and implemented in a coordinated manner and accompanied by an infrastructure delivery and phasing plan.

Proposals will be accompanied by a Transport Assessment which shall:

- 1) assess the impact of development on the local road network and address any implications for on-street car parking arrangements in Dent-de-Lion Road and Garlinge High Street, between the site and the A28; and**
- 2) identify measures to promote multi-modal access, including footway and cycleway connections, and an extended bus service accessible to the residential development and rail linkages.**