



Broadstairs & St. Peter's Town Council

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12th April 2022

Ms Jo Wadey
Strategic Planning Officer,
Thanet District Council,
Cecil Street,
Margate KENT
CT9 1AY

Dear Ms Wadey

RE: Broadstairs & St. Peter's Neighbourhood Plan 2nd Edition

The Broadstairs & St. Peter's Neighbourhood Development plan 2nd Edition is currently out for formal consultation, the consultation began on the 28th March 2022 and will end on the 16th May 2022 at 12:30pm.

The Planning Practice Guidance (Government planning guidance based on the NPPF) states that the Town Council is required to provide a statement as to how significant they think the changes are that have been made to the Neighbourhood Plan.

The PPG says:

- *the qualifying body must (at the pre-submission publicity and consultation stage and when the modified plan is submitted to the local planning authority) state whether they believe that the modifications are so significant or substantial as to change the nature of the plan and give reasons*
- *the local planning authority must (when sending the modified plan to the independent examiner) state whether they believe that the modifications are so significant or substantial as to change the nature of the plan and give reasons. The local planning authority must also submit a copy of the original plan to the independent examiner*
- *the qualifying body must decide whether to proceed with the examination after the examiner has decided whether the modifications proposed change the nature of the plan*

It defines three types of modifications as follows:

- *Minor (non-material) modifications to a neighbourhood plan or order are those which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum.*
- *Material modifications which do not change the nature of the plan or order would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of the independent examiner, are not so significant or substantial as to change the nature of the plan.*
- *Material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development*

The qualifying body that has produced the Neighbourhood Development Plan (NDP) is Broadstairs and St. Peter's Town Council.

The Neighbourhood Area, to which the NDP relates, comprises of the Broadstairs and St. Peter's Parished area. The Neighbourhood Area was designated on the 11th November 2014.

The first Edition of the NDP was submitted to Thanet District Council on the 7th November 2018 and due to the requirement for two examinations, at the request of TDC, and then delays to Governance and the referendum process, caused by Covid, the NDP 1st Edition referendum was not held until the 6th May 2021. The NDP 1st Edition was formally 'made' as part of the TDC development plan on the 6th June 2021.

The Neighbourhood Plan sub-committee of Broadstairs & St. Peter's Town Council, in accordance with the intention to review the NDP every 5 years, began the process of reviewing their NDP in October 2020. Several new background documents have been produced since then and a full community consultation. A new draft NDP 2nd Edition was completed in the early part of 2022 and is currently subject to Regulation 14 consultation.

A marked-up version showing where the changes have been made to the plan can be found in the list of background documents supporting the plan and is attached to this statement for convenience.

The changes to the NDP have been summarised below and this sets out where it is considered that these changes are, Minor (non-material modifications), Material Modifications which do not change the nature of the plan, or Material Modifications which do change the nature of the plan. The reason why the modification has been defined this way has been set out in the table.

Change to Plan	Type of modification	Reason
Foreword Updated to set out the new background to the NDP, and the history of the 1 st Edition. The interested parties that have been involved in its creation have been updated.	Minor	Factual updates
Introduction Updated so that the NPPF 2021 is referenced. Updated so that it is clear how the document has changed from the 1 st Edition.	Minor	Updated to reflect current National and Local Policy
Requirement for an NDP 2 nd Edition. Two paragraphs added setting out why a new NDP 2 nd Edition is being produced.	Minor	Clarification
Planning Policy Framework Updated to include references to the most up-to-date and current Planning documents and legislation. Including the new NPPF and the now adopted TDC Local Plan.	Minor	Updated to reflect current National and Local Policy

What area does the Neighbourhood Development Plan (NDP) cover? No Change	NA	
Time Period Covered by the Neighbourhood Development Plan Updated to bring it in line with the emerging review of the TDC Local Plan	Material modifications which do not change the nature of the plan.	Updated to reflect current Local Policy
Strategic Environmental Assessment and Habitats Regulation Assessment Awaiting update from TDC	NA	
The Broadstairs & St. Peter's Area Updated to include updated population and demographic figures and updated socio-economic data.	Minor	Factual update relating to new published data
Vision and Objectives Updated to streamline the existing objectives and add in 5 new objectives to include climate change, the natural environment, health and well-being and Local Heritage Assets.	Material modifications which do not change the nature of the plan	Updated to reflect the views of the community and the aspirations of the plan.
Planning Policies New section added in setting out the NDP aspirations for Climate Change and Sustainability	Material modifications which do not change the nature of the plan	Updated to reflect the views of the community and the aspirations of the plan. But TDC Climate Change policy referred to.
Improving Air Quality New policy CC1 added to improve the air quality for new developments	Material modifications which do change the nature of the plan	New Policy
Biodiversity New policy CC2 added to improve the Biodiversity net gain of development.	Material modifications which do change the nature of the plan	New Policy
Improving the built environment 4 new paragraphs added setting out the aspirations of improving the built-environment	Minor	Update reflecting the aspirations of the community
The Green Wedge Section updated to bring it inline with the adopted TDC Local Plan. Policy updated as a typo identified within it.	Material modifications which do not change the nature of the plan	Typo altered within the policy. Potential alters the intentions of the policy

Views and Vistas New paragraph added setting out feedback from the community consultation undertaken in April 2021.	Minor	Update reflecting the aspirations of the community
Trees Policy updated and split into separate sections, a-g. Protecting Important Trees, Tree Felling, Diseased Trees, Tree Works for Structural Reasons, Remedial Tree Works, Mitigation planting for lost Trees, Hedges	Material modifications which do not change the nature of the plan	Policy changed significantly. Could change the nature of the plan. But the intention to protect trees has remained. It is considered this provides clarification.
Seafront Character Zones Pre-text updated to reflect the current Blue Flag status of the beaches.	Minor	Factual update
Protecting Important Spaces Pre-text updated to reflect the current list of ACVs. The list of Local Green Spaces updated to include 3 additional LGS. Park Avenue Woodland, St. Peter's Churchyard and Joss Bay (former picnic area)	Material modifications which do change the nature of the plan	Three new LGS added
Sustaining Community Facilities Pre-text updated to reflect the new NPPF.	Minor	Factual update
Design Updated to reflect the New AECOM Design Codes Policy BSP9 updated to reflect these new design codes	Material modifications which do not change the nature of the plan	Updated to reflect the new Design Codes
Conservation Areas No Change	NA	
Heritage Asset Areas Renamed from High Townscape Value areas Policy updated to reflect the evidence in the new Design Code.	Material modifications which do not change the nature of the plan	Updated to reflect the new Design Codes and provide an evidence base to the HAA
Local Heritage Assets List of LHAs updated to reflect the assessment of the LHAs background document	Material modifications which do not change the nature of the plan	Several new Local Heritage Assets added to reflect the assessment of the sites

<p>Importance of the Economy</p> <p>Pre-text updated to reflect current economic position.</p> <p>BSP10 Shopping Areas policy updated to reflect the new September 2020 useclass order</p>	<p>Material modifications which do not change the nature of the plan</p>	<p>Policy updated to reflect the September 2020 change to the Useclass Orders</p>
<p>Employment Development</p> <p>Pre-text updated to reflect current economic position</p>	<p>Minor</p>	<p>Factual update</p>
<p>Tourism</p> <p>Pre-text updated to reflect current position and most up-to-date data on tourism</p>	<p>Minor</p>	<p>Factual update</p>
<p>Health and Wellbeing</p> <p>New section and policy BSP15 added to promote health and wellbeing, by promoting sport and exercise in development and CoU.</p>	<p>Material modifications which do change the nature of the plan</p>	<p>New policy added</p>

Should you require any further information regarding the update, do not hesitate to contact Broadstairs & St. Peter's Town Council as the qualifying body.

Yours Sincerely



Kirsty Holroyd
Town clerk