



Broadstairs & St. Peter's Town Council

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16th January 2023

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, Regulation 16.

The Broadstairs & St. Peter's Neighbourhood Development plan 2nd Edition has now been submitted to Thanet District Council.

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 Parish 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 went out to consultation during the period 28th March 2022 to 6th June 2022. The final draft was submitted to Thanet District Council on 14th December 2022.

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
Throughout Document To ensure that the Neighbourhood area is called Broadstairs & St Peter's.	Minor	To ensure a consistent approach.
Throughout Document Adjust grammar/rectify typo's/formatting/legibility/consistency	Minor	To correct grammatical/typing errors/formatting errors/improve legibility/ensure consistency.
Front Cover Replace regulation 14 Consultation Document with Regulation 16 Submission Document. Amend date. Replace wording to Approved for submission at Council Meeting	Minor	To represent the current stage of the Neighbourhood Development Plan creation.
Contents Page Amend to include change of title from Heritage Asset to High Townscape Value	Minor	Following TDC feedback and to better align with NDP 1 st Edition.

<p>Schedule of Policies</p> <p>Updated to align with Policy Changes</p>	Material modifications which do not change the nature of the plan.	Following TDC feedback and better align with the NDP 1 st Edition
<p>List of Maps</p> <p>Amend to include change of title from Heritage Asset to High Townscape Value</p>	Material modifications which do not change the nature of the plan.	Following TDC feedback and to better align with NDP 1 st Edition.
<p>Foreword</p> <p>Updated for the new time period and wording adjusted.</p>	Minor	Following the appointment of a new Mayor for the 2022-23 Civic Year.
<p>Introduction</p> <p>1st Paragraph wording amended.</p>	Material modifications which do not change the nature of the plan.	In response to comments from TDC.
<p>The Broadstairs & St Peter's Area (p 8)</p> <p>Last sentence updated to Westwood retail and Leisure parks.</p>	Minor	To better reflect the commercial offering at these sites.
<p>The Broadstairs & St Peter's Area (p 9)</p> <p>1st paragraph wording amended to align with train transport changes.</p>	Minor	To reflect the current factual position.
<p>List of Education Offering (p 10)</p> <p>Updated to include additional educational facility.</p>	Minor	To reflect the current factual position.
<p>Objective List (p 12)</p> <p>Amend to include change of title from Heritage Asset to High Townscape Value</p>	Material modifications which do not change the nature of the plan.	To reflect feedback from TDC.
<p>Climate Change (p 13)</p> <p>Removal of wording relating to aims.</p>	Material modifications which do not change the nature of the plan.	Already out of date and to ensure that the NDP remains up to date regarding climate change aspirations throughout the lifetime of the plan.
<p>Environment Strategy (p 14)</p> <p>Addition of footnote to reference the adoption date of the Town Council's Environment Strategy.</p>	Minor	To provide clarity on the status of the Environment Strategy.
<p>Policy CC1 (p 15)</p> <p>Change of wording to policy.</p>	Minor	To better align with NPPF paragraph 174e.

<p>Improving Biodiversity (p 15)</p> <p>3rd Paragraph addition of use of materials not encouraged.</p>	<p>Material modifications which do not change the nature of the plan.</p>	<p>Following community feedback on the regulation 14 Neighbourhood Plan</p>
<p>Improving Biodiversity (p 16)</p> <p>New paragraph added regarding Biodiversity net gain.</p>	<p>Material modifications which do change the nature of the plan</p>	<p>Following feedback from TDC to ensure the NDP better aligns to the Environment Act 2021.</p>
<p>Policy CC2 (p 16)</p> <p>Amended policy wording.</p>	<p>Material modifications which do change the nature of the plan</p>	<p>To better align with emerging BNG requirements of the Environment Act 2021.</p>
<p>Trees Policies (p 24)</p> <p>Policy updated and replaced</p>	<p>Material modifications which do change the nature of the plan</p>	<p>In response to comments made by TDC and to ensure that the policy better aligns with rules and regulations regarding applications relating to trees.</p>
<p>Design</p> <p>Amend all items within section 9.3 from Heritage Asset to High Townscape Value</p>	<p>Material modifications which do not change the nature of the plan.</p>	<p>Following TDC feedback and to better align with the NDP 1st Edition.</p>
<p>Our High Streets and Shopping Areas</p> <p>P 41 – Replace first three paragraphs with new text reflecting the updated Westwood Cross Retail and leisure complex.</p>	<p>Material modifications which do not change the nature of the plan.</p>	<p>To set out the current position and to consolidate the text and prevent repetition.</p>
<p>Employment Development</p> <p>Amendment of last sentence in second paragraph to reflect updated working practices.</p>	<p>Minor</p>	<p>To better represent current working practices.</p>
<p>Community Projects</p> <p>Text amended to remove completed projects and to incorporate new projects for the period of the 2nd Edition NDP.</p>	<p>Material modifications which do change the nature of the plan</p>	<p>Updated to reflect completed and new Community Projects.</p>
<p>Monitoring & Review</p> <p>BSP3 – amend the table to incorporate the changes to the Tree Policies</p>	<p>Material modifications which do change the nature of the plan</p>	<p>To reflect the changes made to the Tree Policies.</p>
<p>Appendix 2</p> <p>Addition of text re maps for Local Green Spaces and the inclusion of a website link</p>	<p>Minor</p>	<p>To improve legibility and provide information</p>

Appendix 2 To correct the size of the perimeter path around the Pysons Road Industrial Estate.	Minor	To be factually correct.
Appendix 3 Amend maps title to High Townscape Value	Material modifications which do not change the nature of the plan.	Following TDC feedback and to better align with the NDP 1 st Edition.
Appendix 4 Changes to the list of locally listed buildings.	Material modifications which do not change the nature of the plan.	Following an assessment of and update to the background document on Local Heritage Assets.
Glossary Text changes within the NPPF section, TDC section and Vista Section	Material modifications which do not change the nature of the plan.	Updated to represent the changes made in the 2 nd Edition NDP.

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