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**Councillor K Morris**  
**Leader of the Council**

**Direct Line: (01304) 872090**  
**Date: 4<sup>th</sup> October 2018**

Dear Adrian,

**RE: Draft Thanet Local Plan to 2031 – Pre-Submission Publication, Regulation 19**

Thank you for inviting Dover District Council (DDC) to comment on Thanet District Council's (TDC) draft Local Plan to 2031. The District Council has previously submitted its response to earlier iterations of the draft Local Plan as part of the formal consultation process.

DDC has reviewed the suite of consultation documents and with regard to the Duty to Co-operate, sets out its position as follows:

**Strategic Housing Market Assessment (SHMA)**

In its response dated 20 March 2017, DDC detailed its position in relation to the findings of TDC's Strategic Housing Market Assessment (2016), specifically the disagreement regarding the identified Housing Market Area (HMA) of Thanet, Canterbury and Dover. This differs to DDC's SHMA (2017) that identifies a HMA of Dover and Shepway as most appropriate for the Dover District.

With regard to paragraph 9.7 of the Duty to Co-operate Statement (2018) and paragraph 3.4 of the draft Local Plan to 2031, the District Council confirms that a meeting was held between TDC, DDC and GL Hearn to discuss the above matter. However, to date, no final agreement has been reached on the extent of the HMA boundaries and therefore the District Council's position on this still stands.

Whilst the matter regarding the HMAs is still outstanding, DDC supports TDC's approach to meet its own housing requirement as outlined in paragraph 9.9 in the Duty to Co-operate Statement (July 2018).

**Manston Airport**

The future of the former Manston Airport site is considered to be a cross boundary issue given its proximity to the Dover District and the transportation and employment interactions it has on the local area. The location of the site to Discovery Park, Sandwich and Kent County Council's (KCC) proposed Thanet Parkway Railway Station at Cliffsend, combined with commitments in investing in key infrastructure (e.g. strategic network improvements), will offer the opportunity to further enhance domestic and international connectivity and attract inward investment to East Kent.

As part of the formal consultation on previous iterations of the draft Local Plan to 2031, DDC detailed its concerns in relation to Policy SP05: Manston Airport allocating the former

Manston Airport site for mixed use development. However, this policy has since been removed following the submission of a DCO application for an alternative use for the site and TDC proposes to not allocate the site for any specific purpose in the draft Local Plan.

DDC offers its support to RiverOak Strategic Partners' (RSP) proposal to re-open Manston Airport as an operational freight-focused airport and recognises the positive contribution it would make to the regeneration of the East Kent economy and meeting East Kent priorities.

The proposed development is supportive of the following motion passed by the District Council in July 2014 in relation to the former Manston Airport site:

*"The Council supports the campaign to retain Manston as an operational airport, recognising the role and place it can have in the UK aviation industry, making better use of regional capacity in accordance with the views of the South East Local Enterprise Partnership, while making a significant contribution as on the strategic priorities for regeneration of the East Kent area."*

The District Council notes paragraphs 1.44 and 1.45 regarding the consideration for a Local Plan Review upon the determination of the DCO process and would welcome early and continuous engagement with TDC in relation to the future of the former Manston Airport site.

## **Transportation**

The preparation of the Thanet Transport Strategy (2018) to support the proposals in the draft Thanet Local Plan to 2031 is welcomed. Specifically, the District Council recognises paragraph 6.2.1 that identifies the need and importance to consider the travel implications of future growth of growth plans associated with M2/A2/A299 Brenley Corner.

The Strategic Route Network Impact Report (2018) assesses the potential impact of future growth in Thanet on the strategic road network which indicates that the impact of development in Thanet is likely to be negligible. DDC looks forward to continue to engage with neighbouring authorities and KCC – as Local Highway Authority - on this matter and is supportive of Policy SP46: Strategic Road Network, as well as TDC's commitment to provide any additional information and analysis in due course, as set out in paragraph 9.35 in the Duty to Co-operate Statement (2018).

### *Thanet Parkway Railway Station*

DDC supports Policy SP45: New Railway Station that safeguards land to the west of Cliffsend for KCC's Thanet Parkway Railway Station project. The proposed provision of a new railway station will provide an opportunity to enhance connectivity to Discovery Park and in turn positively contribute toward the economic regeneration of East Kent.

## **Retail Capacity and Requirements**

With regard to the potential impact associated with forecast retail capacity and DDC's concerns in relation to the proposed level of retail provision at Westwood and the potential impact on Dover's retail function, the District Council supports TDC's commitment to share any relevant topic paper regarding revised retail figures and would welcome early engagement on this.

## **Ecology**

### *International Wildlife Sites*

The District Council supports paragraph 4.41 in the draft Local Plan to 2031 which identifies the Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Ramsar site as a cross boundary matter. Additionally, DDC supports Policy SP25: Protection of the

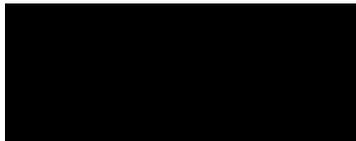
International and European Designated Sites which requires the consideration of the potential impact of future development proposals on environmentally designated sites, as well as associated mitigation measures.

DDC's Thanet Coast SPA Mitigation Strategy (2012) monitors the potential impact of increased development in the Dover District on the qualifying bird species of the Thanet Coast and Sandwich Bay SPA. This Strategy is supported by an ongoing visitor disturbance study at Pegwell Bay and Sandwich Bay. As part of DDC's Local Plan Review, the evidence base to support the Strategy (2012) is currently being updated. In addition, a review of approaches being taken by neighbouring authorities across East Kent is ongoing to determine whether an equitable approach is being taken or whether there are any lessons to be learned for DDC. Future engagement with TDC on the outcomes of this work would be welcomed.

I trust that you find all of the above comments useful and the District Council very much looks forward to continue to be positively engaged in the cross boundary matters identified as the Local Plan process advances.

Please do not hesitate to contact me if you require any further clarifications at this point.

Yours sincerely



Keith Morris  
**Leader of the Council**

