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Councillor Keith Morris
Leader of the Council

Direct Line: (01304) 872090
Our ref: AN/KM/DD
Date: 18 March 2019

Dear Sir/Madam

RE: Draft Thanet Local Plan to 2031 Examination – Matters, Issues & Questions (March 2019)

Thank you for notifying Dover District Council (DDC) of the submission of Thanet District Council's (TDC) *Draft Thanet Local Plan to 2031* and for inviting the Council to comment on the Inspectors' *Matters, Issues and Questions*.

The Council previously set out its position in relation to the *Draft Thanet Local Plan to 2031* in its response to TDC's Regulation 19 consultation dated 4 October 2018 which is appended to this letter. In addition to this, the District Council has identified the relevant questions and sets out its comments below:

Q.4. Paragraphs 9.6-9.7 of the *Draft Thanet Local Plan Duty to Cooperate Statement* confirm that discussions have been held with Dover District Council regarding the extent of the housing market area referred to in the Council's *Strategic Housing Market Assessment* ('SHMA') but that no final agreement has yet been reached. What is the current status regarding ongoing discussions with Dover District Council on this issue? What were the outcomes of dialogue with other Kent authorities on the approach to housing market areas?

As part of the preparation of the new Dover District Local Plan, the Council commissioned Peter Brett Associates (PBA) to complete a Strategic Housing Market Assessment (SHMA) in February 2017. This was carried out in line with Government requirements at that time to identify the objectively assessed need for housing. The key findings were:

- The Dover District has very strong links with Shepway whereas parts of the district, particularly Sandwich, have links with Canterbury and Thanet. PBA has, however, recommended that on balance, the Dover District is best placed in a Shepway and Dover Housing Market Area (HMA) rather than a Thanet, Canterbury and Dover HMA which has been identified in the Thanet SHMA by consultants GL Hearn.
- The SHMA identified an Objectively Assessed Need (OAN) of 529 dwellings a year of which 187 dwellings a year should be affordable housing.

Since the publication of the Council's SHMA in 2017, the Government has introduced a standard methodology for calculating housing need. Using the Government's current version of the standardised methodology, the Dover District would be required to deliver a minimum of 598 dpa for the new Local Plan period up to 2037.

The Council can confirm that it has engaged in discussions with TDC on this matter as set out in the *Draft Thanet Local Plan Duty to Co-operate Statement*. Whilst Dover District Council is still assessing the suitability of a range of sites, both local planning authorities have agreed that they intend to meet their own individual housing needs whilst recognising that there is a difference of opinion between the two consultants in relation to the Housing Market Areas.

Q.17. Has policy SP25 taken account of Dover District Council's *Thanet Coast SPA Mitigation Strategy (2012)* and ongoing visitor disturbance study at Pegwell Bay and Sandwich Bay? Are there any cross-boundary implications relevant to the policy?

Since the adoption of Dover District Council's Thanet Coast SPA and Ramsar Mitigation Strategy in 2012, the Council has commenced a Local Plan Review. As part of the preparation of the new Dover District Local Plan, the Council has commissioned a review and will be working co-operatively and proactively with neighbouring authorities to commission a review of the Thanet Coast SPA Mitigation Strategy. In addition, the Council is a member of the National Nature Reserve Pegwell and Sandwich Bay Steering Group that will ensure continued engagement between the Council and TDC. The Council will continue to ensure the consideration of cross-boundary implications associated with draft Policy SP25 through the relevant forums and Duty-to-Co-operate meetings as the preparation of the new Dover District Local Plan advances.

I trust that you find all of the above comments useful and should you have any further questions or require any further clarifications at this point, please do not hesitate to contact me.

Yours faithfully



Keith Morris
Leader of the Council

Enc - Appendix 1: DDC response to TDC's Regulation 19 Pre-submission consultation dated 4 October 2018.