

**THANET DISTRICT COUNCIL LOCAL PLAN  
EXAMINATION**

**MATTERS 10 – ECONOMIC DEVELOPMENT (POLICIES  
SP02-SP04 AND E01)**

**IN RESPECT OF**

**LAND AT MANSTON BUSINESS PARK**

**HEARING STATEMENT BY RPS  
ON BEHALF OF CHINA GATEWAY INTERNATIONAL  
LTD**

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## REPORT

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### Approval for issue

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# 1 MATTERS 10 – ISSUE 1: ECONOMIC DEVELOPMENT (POLICY SP02)

***Q7. What are the implications of this? If taken up, will there be enough housing to support the development of allocated sites? Will there be an appropriate balance between workers and homes?***

1.1 Manston Business Park is surrounded with limited housing located within the immediate area, with the nearest established rural settlements being Manston, Woodchurch and Acol. With the proposed intensification and growth of the business park it is our view that there will need to be additional housing located nearby to support this level of economic inward investment.

1.2 China Gateway International Limited previously put forward the sites identified as Phase 1, 2 and 3, for a mixture of employment, mixed use and residential developments across all three sites.

## **Phase 1 – Employment Uses**

1.3 Given the existing employment designation of much of the land forming Phase 1, and the previous resolution to grant of planning permission (ref: F/TH/08/0400) for commercial development, which was not implemented due to global recession, it is considered that an employment use is the best use of land. It is not China Gateway International Limited's intention to lose employment floorspace within the Land Allocation for Economic Developments (EC1), but instead enhance any future proposed employment development to also include non B use classes where appropriate. This is in line with Policy SP04 of the draft Local Plan and our proposed amendments.

1.4 Mayweather's Properties Limited have been working closely with EKO (East Kent Opportunities) and has already delivered some 101 new units at 'The Oaks' (the newest addition to East Kent's Manston Business Park) with a further 70 units completed in the last 6 months. A total of 200 units are expected to be completed and let or sold by the end of the year. This has created over 300 jobs to date, so local housing is essential to support inward investment and make the growth sustainable at Manston.

## **Phase 2 – Mixed Use (Other Employment Generating Uses)**

1.5 Phase 2 is an area which is open, not currently developed and falls outside the employment designation. The view is taken that this open land provides a good opportunity to accommodate a mixed use development. The mixed uses proposed comprise A1/A2 and potentially D1/D2 uses.

1.6 This will provide a positive transition from employment use (Phase 1) to a mixed-use development (Phase 2). These uses will provide employment generating uses, which maintains the employment allocation of these areas as well as providing the opportunity to introduce other services that can support the Manston Business Park, and the wider rural settlements of Thanet.

1.7 The rural settlement such as Acol and Manston have very limited local services as identified in Topic Paper Housing for Rural Areas. The lack of local services requires the residents of these villages to travel neighbouring larger villages and towns such as Birchington-on-Sea and Ramsgate. The allocation of Phase 2 provides the opportunity for a mixed-use development has

the potential to provide much needed local services for residents of the rural settlements which will decrease the need to travel to larger settlements.

### **Phase 3 – Residential Development**

- 1.8 It is envisaged that Phase 3 will provide a predominantly residential development. This transitioned approach from west to east of employment uses to mixed use and then to residential development ties in well with the current pockets of development across all three Phases. This method provides a natural progression of residential development, which integrates with the recent residential developments along Spitfire Way (B2190) and beyond into Manston. Furthermore, given the proximity to Manston Airport it is proposed that careful consideration is given to this boundary and through sensitive design principles it may be possible to incorporate a landscaped buffer with housing developments set further back, to facilitate the creation of sustainable residential neighbourhoods. As this part of the site is contained within the Chalk Plateau, the intention will be to enhance the environmental character and adhere to the criteria of Policy SP23 of the draft Local Plan.
- 1.9 All three phases are located along Strategic Routes (Policy SP47) which will provide necessary infrastructure to accommodate future development within this locality with good accessibility and connectivity to the local services, of the District. It is acknowledged that the recommended uses will generate an increase in transport movements. However, the site benefits from being located on a Strategic Route (Policy SP47), which will aid in providing the necessary infrastructure to support these mixed-use developments.
- 1.10 Once all three phases of the masterplan have been implemented, the land to the east of the Manston Business Park will create a comprehensive sustainable development which will create mixed-use developments that will promote improvements in home affordability, walkability to homes, workplaces and amenities, and strong neighbourhoods. Manston has the potential be form a cornerstone of the Council's wider plans to establish the area as a prime live/work investment hub, with supporting new housing being essential to support the growing need for smaller business units at Manston. A joined up and longer-term approach is required to make a success of prime, large scale development opportunities in Thanet and encourage inward investment into the regional market. Whilst the next generation of mixed-use development is in its infancy in many respects, we are witnessing a handful of missed use schemes leading the way in Kent and Thanet needs to secure its place. This masterplan approach is in accordance with paragraph 7 of the NPPF 2012.

### ***Q8. What provision does the Plan make to support creative industries across Thanet? Is the Plan consistent with paragraph 21 of the Framework in this regard which seeks to plan positively for the location, promotion and expansion of clusters or networks?***

- 1.11 Policy SP02 does not make provision to support the creative industries across Thanet. As identified later in this Statement within paragraph 3.9 and 5.2, we have identified that the Manston Business Park should consider accommodating a small provision of non-B class uses, to increase the marketability of the business park and encourage the inward investment that is sought within the draft Local Plan. Paragraph 5.2 of the statement identifies that there has been an increasing demand for smaller units which if our proposed amendments to Policy SP03 are agreed, will allow for the take up of these small units, for other uses other than B class use, and this could offer the opportunity for creative industries and start-up businesses.

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- 1.12 Based on the foregoing it is our view that draft Local Plan, in the instance when applied to the Manston Business Park is in accordance with Paragraph 21 of the NPPF 2012.

## 2 MATTERS 10 – ISSUE 2: LAND ALLOCATED FOR ECONOMIC DEVELOPMENT (POLICY SP03)

**Q3. How much land is available at each of the four allocated sites, and are they developable within the plan period?**

- 2.1 As identified in paragraph 6.1 of the Thanet District Council Economic Development in Thanet (Employment Land Update and Economic Needs Assessment July 2018) the table clearly identifies the four allocated sites and the provision of land available to accommodate economic development.

Site	Total Site Area (ha)	Remaining employment allocation (ha)
Manston Business Park	75.2	42.53
Eurokent	38.6	5.45
Thanet Reach	9.74	3.7
Hedgend	2.46	1.61
<b>TOTAL</b>	126	53.29

- 2.2 The assessment identifies that the majority of the employment provision is allocated at Manston Business Park. Approximately 42 hectares remains undeveloped although there have been several recent development following slow take up of the site. However, given deliverability problems and the history of slow land take up then it is considered that the delivery of site will progress beyond the 2031 horizon of the Local Plan. As the site is approximately half developed it would not represent positive planning to remove it from employment allocations and to do so would leave an undersupply of employment land especially given all the justification for maintaining an oversupply.
- 2.3 We welcome the majority of the employment provision being proposed to be located at the Manston Business Park as it is identified as the largest area of employment land in Thanet and has been constantly considered as ideally located for inward investment as it is centrally located adjacent to the airport and near Ramsgate port.
- 2.4 Whilst this information is located within the supporting Employment Land Update and Economic Needs Assessment (July 2018), it is not explicitly expressed within the text of Policy SP03 and we would welcome an amendment to the policy to include the proposed employment floorspace thresholds.

**Q5. What is the justification for restricting development to Use Classes B1, B2 and B8 at Manston Business Park and Hedgend Industrial Estate, but having a more flexible approach elsewhere?**

- 2.5 The Council's position to restrict to Use Classes B1, B2 and B8 at Manston Business Park under Policy SP03, can be justified to an extent as the business park plays an integral part within the draft Local Plan to deliver a considerable proportion of the employment provision for Thanet.
- 2.6 However, Policy SP03 is contradicted by Policy SP02 Economic Growth which states that '*the aim is to accommodate inward investment in job creating development, the establishment of new businesses and **expansion and diversification of existing firms***'. There are several established existing businesses located at the Manston Business Park, and further clarity is required into the interpretation of diversification of existing firms, as this could promote

- established businesses diversifying to the extent in which they require premises that are within non-B class uses.
- 2.7 A recent planning application ref: F/TH/16/0939 for a retrospective permission for the change of use from a light and general industrial unit to Café (use class A3) was granted planning permission on 20<sup>th</sup> October 2016. The grant of this planning permission on an allocated employment site for B1, B2 and B8 uses only, has the potential to set a precedent that alternative non-B class uses are appropriate at the Manston Business Park.
- 2.8 We therefore propose an amendment to Policy SP03, which should highlight that the Manston Business Park has the potential to support flexible employment uses. However, this is on the basis that an element of protection is attributed to the fundamental established B class uses at the business park. We propose a threshold approach in favour of a higher B class uses actively present on the site, with a small provision for alternative employment generating uses.
- 2.9 This approach provides a compromise between Policy SP02 which promotes the diversification of existing firms as well as still protecting the B class uses at Manston Business Park identified in Policy SP03.
- 2.10 If the Council has reservations about the amendments identified above, we would request that the Inspector considers the previously proposed masterplan submitted during the Regulation 19 Stage. The masterplan proposed a three phased development for land within and to the east of the Manston Business Park consisting of the following;
- **Phase 1:** Manston Business Park – (Employment);
  - **Phase 2:** Land to the east of Manston Business Park – Mixed Use (Other Employment Generating Uses); and
  - **Phase 3:** Land to the east of Phase 2 – (Residential Development)
- 2.11 All three phases are located along Strategic Routes (Policy SP47), which will provide the necessary infrastructure to accommodate further development within this locality and provide good accessibility and connectivity to the local services and the wider surrounding area of Thanet District.
- 2.12 The proposed master plan is in line with paragraph 17, Core Principle 9, which seeks to promote mixed used developments, and encourages multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions.



### 3. MATTERS 10 – ISSUE 3: RETENTION OF EXISTING EMPLOYMENT SITES (POLICY E01)

**Q1. Is Policy E01 consistent with paragraph 22 of the Framework which states that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose?**

3.1 Policy E01 part 2, identifies the Manston Business Park as an existing business site that should be retained for traditional employment uses falling with the Use Classes B1 and B8 in locations close to residential areas, with additional B2 in appropriate locations away from residential developments. The significance of the Manston Business Park, contributing to an increase in employment uses is further supported in Policy SP03 Land allocated for Economic Development, which clearly states within paragraph 1.32 states that a “flagship” site for inward investment that can also accommodate growing indigenous business is provided for at Manston Business Park.

3.2 The Manston Business Park benefits from a previous grant of planning permission under planning application ref: F/TH/08/0400, for commercial developments, which was not implemented. However, the consent reinforced that the principle of employment uses is the best use of the land.

With reference to the Thanet District Council, Economic Development in Thanet (Employment Land Update and Economic Needs Assessment (July 2018), it has been highlighted in paragraph 5.38 that the Manston Business Park scored a high 12 out of 15 mainly due to its prime location with good/ recently upgraded transport connections and through recent developments the site is marketable.

Manston Business Park	75.2	5	This site is the Districts largest employment site and is centrally located. There are a number of large occupiers. Currently there are 3 units being actively marketed and there are currently new units being built out	4	4	This site is located away from centres of population and facilities for staff but is well related to the primary road network and as this large site develops with a number of occupiers it is considered that staff facilities are likely to improve	4	4	The site is in a prime/accessible location which is compatible with business use and is therefore attractive to developers. Improvements to the road network makes the site more attractive. Some improvements to the spitfire junction may be required as development comes forward.	4	18	12: This is a strategic employment site in the District which is centrally located and is showing signs of development
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Figure 1: Extract from Thanet District Council – Economic Development in Thanet (Employment Update and Economic Needs Assessments July 2018 – Appendix 1 – Site Scoring

3.4 It is our view that the protection of the Manston Business Park for employment uses is consistent with paragraph 22 of the National Planning Policy Framework 2012.

**Q2. Is it clear to decision-makers, developers and local communities how proposals for alternative uses of land and buildings on the sites listed under Policy E01 will be considered?**

3.5 Policy E01, highlights sites which can accommodate flexible employment uses other than B1, B2 and B8 using an asterisk at the end of retained employment sites. However, within Policy E01, the Dane Valley Industrial Estate St. Peter, Broadstairs, Westwood Industrial Estate, Margate and Eurokent (part), Ramsgate are the only sites identified for flexible employment uses.

- 3.6 As identified in paragraphs 3.8 – 3.12 we propose that Policy E01 is amended to include Manston Business Park as an employment site that can support alternative flexible uses. We also recommend that a map of the retained employment sites is incorporated within Policy E01 to provide a clearer understanding of their locations in relation to the wider District.

***Q5. What policies support proposals for economic development on non-allocated, windfall sites? Does the Plan include specific criteria for decision-makers, developers and local communities to follow?***

- 3.7 Policy E01 is absent of any policy stance for the support for proposals for economic development on non-allocated, windfall sites. The policy will need to provide a clear steer on the provision of non-allocated economic development sites and their development criteria.

## 4. MATTERS 10 – ISSUE 6- MANSTON BUSINESS PARK (POLICY SP04)

***Q1. What is the justification for allocating over 40 hectares of land at Manston Business Park? Will there be a demand for the allocated land over the plan period? If so, what evidence supports this?***

- 4.1 In the Thanet District Council Economic Development in Thanet (Employment Update and Economic Needs Assessment July 2018), paragraph 5.34 identifies that the Manston Business Park is still considered to be ideally located for inward investment as it is centrally located adjacent to the airport and near the port. The Business Park is undergoing development with current occupiers of the site increasing the provision of B1, B2 and B8 uses in and around the Business Park. As previously identified the business park scored very highly as a site that can deliver inward investment and is in a prime location with good and recent upgrades to transport infrastructure and connections, which has added to the value of the business park and increasing its marketability to prospective business and investors, which will contribute to the overall economic growth of Thanet.
- 4.2 There has been consistent take up of units within the Business Park, with a growing demand for smaller business units. The previously submitted indicative master plan, illustrates an increased intensification of the Business Park with a mixture of smaller units.
- 4.3 We support the allocation of 40 hectares of land at Manston Business Park and agree with the justification identified within the Thanet District Council Economic Development in Thanet (Employment Update and Economic Needs Assessment July 2018).

***Q2. What is the justification for requiring development proposals at Manston Business Park to be accompanied by a Transport Assessment and Travel Plan? Is this appropriate for all development proposals, regardless of size?***

- 4.4 The Manston Business Park is identified as a key employment site and when operating at full capacity will generate increased traffic generation. However, as identified in the Thanet District Council Economic Development in Thanet (Employment Update and Economic Needs Assessment July 2018 the Business Park has benefited from good and upgraded transport infrastructure and is located along two Strategic Routes which are classified as B2190 Spitfire Way (from Spitfire Junction to Columbus Avenue Junction) and B2050 Manston Road (from Manston Court Road to Spitfire Junction). These two Strategic Routes will provide necessary infrastructure to accommodate further developments within this locality and provide good accessibility and connectivity to the local services and the wider surrounding area of Thanet.
- 4.5 We acknowledge that the requirement for development proposals to be accompanied by a Transport Assessment and Travel Plan is deemed acceptable for the reason outlined above.

***Q3. In deciding to allocate the site for employment uses how have the cumulative effects of additional development on the local and strategic road network been considered?***

- 4.6 As identified in paragraph 5.4, Manston Business Park is in a good location which is served well by improved road infrastructure and is located along two Strategic Routes as well as a proposed link road by Kent County Council (currently under review), which will all contribute to providing enough connectivity to the wider surrounding area of Thanet.

## 5. PROPOSED AMENDMENTS

5.1 We set out below the amendments and additions that we consider will render the Plan sound. Any new text or policy is evidenced in **bold**. Removed text and corrections are identified by ~~strikethroughs~~.

### **Policy SP03 – Land Allocated for Economic Development**

5.2 As noted in Paragraph 3.10 and 3.11, we consider that paragraph SP03 should be amended to provide an extent of flexibility between B use classes and non-B use classes at Manston Business Park.

5.3 Our proposed text for Policy SP03 would be:

*The following sites are allocated for business and employment generating purposes:*

- *Manston Business Park, Manston\**
- *Eurokent (part)\*, Ramsgate*
- *Thanet Reach Business Park, Broadstairs*
- *Hedgend Industrial Estate, St Nicholas*

Site	Total Site Area (ha)	Remaining employment allocation (ha)
<b>Manston Business Park</b>	<b>75.2</b>	<b>42.53</b>
<b>Eurokent</b>	<b>38.6</b>	<b>5.45</b>
<b>Thanet Reach</b>	<b>9.74</b>	<b>3.7</b>
<b>Hedgend</b>	<b>2.46</b>	<b>1.61</b>
<b>TOTAL</b>	<b>126</b>	<b>53.29</b>

*At ~~Manston Business Park and Hedgend Industrial Estate~~, development will be restricted to use classes B1 (business)\*, B2 (general industry) \* and B8 (storage and distribution) \*. **Manston Business Park** and Eurokent are allocated for flexible business use in accordance with Policy SP07 (2) \* Thanet Reach Business Park is also suitable for education uses as well as B1 and B8 uses.*

*Development proposals must be accompanied by a transport assessment and travel plan in accordance with Policy TP01 and provide for at least one electric vehicle charging point for every 10 spaces provided.*

*\*these are flexible employment sites, where wider employment generating uses will be allowed in addition to B1, B2 and B8 uses. Development must be compatible with neighbouring uses. Proposal for main town centre uses should also comply with Policy E05 – the sequential test. These uses will be expected to contribute towards the Local Employment and Training Fund.*

**Policy E01 – Retention of Existing Employment Sites**

5.4 As identified in paragraph 4.5, we consider that Policy E01 should include policy stance for proposals for economic development on non-allocated, windfall sites. For consistency, we have included the amendments to Policy SP03, which will need to be amended in Policy E01 regarding the promotion of alternative flexible uses at Manston Business Park.

5.5 Our proposed text for Policy E01 is as follows;

**Policy E01 – Retention of existing employment sites**

The following sites will be retained for employment uses falling within Use Classes B1 and B8 in locations close to residential areas, with additional B2 in appropriate locations away from residential development:

1. All sites specially identified under policy SP03; and
  2. Existing business sites and premises identified set out below;
- Add Asterix to the Manston Business Park (part), Manston (\*)

**Please refer to the retention of employment sites map which identifies the above site within Thanet.**

\*these are flexible employment sites, where wider employment generating uses will be allowed in addition to B1, B2 and B8 uses. Development must be compatible with neighbouring uses. Proposals for main town centre uses should also comply with Policy E05 – the sequential test. These uses will be expected to contribute towards the Local Employment and Training Fund.

**Non-employment windfall sites will need to be assessed on a case by case by the Council in line with Policy SP02.**