Thanet District Council's response to the East Kent Sustainable Community Strategy

This document sets out Thanet District Council's responses to the EKSCS and reflects input from the Corporate Management Team and senior officers from Planning and Housing. It has been reviewed by a Scrutiny Working Group and informally by the Cabinet.

The vision

1. We do not believe that it is a realistic ambition for East Kent to gain an international reputation for research and development at the cutting edge of emerging technologies. Economic history tells us that the position of areas such as 'Silicon Fen' (Cambridge) is so well established that there are no new opportunities for this sector. Furthermore, many major international companies export their research and development expertise – particularly to the Far East and USA. Instead, the vision should aim at a sustainable future providing the broadest possible range of employment opportunities across all sectors to enable those attaining higher educational standards are not obliged to move out of the area.

2. The educational element within the vision is highly aspirational; 'educational excellence' may be feasible at the Further and Higher sectors but at Secondary and Primary level there is a lot of ground to be made up.

3. Similarly, 'enviable quality of life' and 'a living environment of unparalleled quality' are highly ambitious and we must not set ourselves up for failure. Some parts of east Kent have a long way to go before achieving either of these two aspirations.

4. Although east Kent has many attractions including a World Heritage Site, it is not appropriate to aim to become a World Class visitor destination. London already has this status, and East Kent should position itself between London and Europe.

5. East Kent is, in essence, an international transport corridor rather than a hub. This presents opportunities for our people to benefit from a high quality of life in living locally, whilst earning their income outside east Kent. The relationship between east Kent and London – ranked 6 or 7 in the International League of Top Cities in the World – is a major omission in the document. For example, there is no mention of journey times to London to Thanet via HS1 on page 17.

Environmental/coast

1. East Kent has a valuable natural environment that is under increasing pressure from an increasing population, and the development of land for employment and housing. There is nothing in the strategy to protect east Kent's natural environment; it is seen merely as an asset to support the offer to visitors or to provide leisure opportunities.

2. Across East Kent, the coastal and marine environments are part of the identity of the area – as are the landscape and biodiversity. The draft strategy misses out the wider environmental perspective in which it is set, and also fails to link with strategies for helping these international

designations for nature conservation – such as the European Natura 2000 sites on land, coast and the marine environment.

Health and housing

1. The huge amount of work done by the Regional Assembly on assessing the appropriate housing numbers for the South East appears to have been ignored. These have already been increased by the government and the strategy suggests that more may be required. We would like to see the evidence to support a further increase.

2. The section on housing misses some key points: for example, there is some evidence that there is an over supply of housing – hence the problems in the private sector in Cliftonville and Dover. There is also no mention of the poor quality housing stock – 23,000 non-decent homes in Thanet alone. In our view the poor quality of the existing housing stock is a greater problem than the shortage of new housing.

3. The strategy is very weak on tackling deprivation with little reference to, for example, inequalities in relation to health and housing. We would like the strategy to include actions to tackle deprivation in areas such as Margate through intervention in the housing market to change the balance of tenures, deterring the inward migration of vulnerable people.

4. The migration of vulnerable people – either voluntarily or through the placement by statutory and voluntary agencies into east Kent is not recognised in the strategy, and there needs to be action through KCC to stop the placement of vulnerable people – particularly looked after children – by other agencies and councils.

5. There are few references to health inequalities despite parts of east Kent being a high priority for the PCT. For example, there is no reference to the high prevalence of smoking, teenage pregnancies and domestic abuse.

6. There needs to be a recognition of the relationship between quality of housing and deprivation to ensure that the economic benefits of physical regeneration are realised.

Transport

1. There is no mention of the airport and we would have expected to see it in 1.2.1 (connectivity), 1.3.1 (transport) and 1.3.6 (economic opportunity). This is a major omission and must be included in the final document.

2. Conversely, page 16 refers to a potential expansion at Lydd airport. This has not been supported at Regional or County planning levels.

3. Section 1.2.2 on local connectivity is poorly written; we should be more upbeat about our excellent road connections and also mention future improvements in Thanet and Dover.

Other specific comments

1. Spatial planning objectives in the Local Development Framework should align not only with national and regional plans, but also with the shared local priorities set out in the SCS's where these are consistent with national and regional policy. As such, key spatial planning objectives in the LDF Core Strategy should be in harmony with SCS priorities.

2. There is some concern, shared with planning colleagues across east Kent, that the previous baseline document was prepared without any shared database and without any justification for departing from high level documents such as the South East Plan. Therefore we need to ensure that the emerging SCS does not, without justification, invalidate or undermine our well advanced LDF work.