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23 September 2009

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By Post and Email (programme.officer@dover.gov.uk)

Dear Ms Allen

DOVER DISTRICT LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY EXAMINATION

Further to your letter of 8th September 2009 which included minutes of the pre-hearing meeting and agenda for the forthcoming LDF Examination, we write to you to thank you for this information and for the opportunity to come and participate in the hearings.

Having reviewed the information that you kindly sent through to us, we are of the opinion that the representations that we submitted on the 7th May 2008 and 25th March 2009 sufficiently cover the points which we would have liked to discuss at the hearing. However, we feel that on review of the agendas, our participation would only repeat matters and would not add anything to the discussion.

However, for clarity we summarise the points that we wish the inspector to be made aware of below:

- The former Richborough Power Station and surrounding land comprises a total of approximately 121 hectares of which, 101 hectares falls within the administrative area of Dover District. As such this presents a substantial site for development and this significant opportunity should be recognised within the Core Strategy;
- We object to the references within the Core Strategy and site allocations document which refer to safeguarding land at Richborough Power Station for the Channel Tunnel Rail Link (CTRL). As the CTRL is now fully functioning, this safeguarding should be removed and this policy deleted. Dover District Council and Thanet District Council should liaise with the Secretary of State for Transport to have this removed. Failure to do so will mean that, in our opinion, the document is still **unsound** as the designation will continue to blight strategic sites such as Richborough Power Station. In order to make this sound, we consider that the Core Strategy must make reference to seeking to remove CTRL designations where there is no future possibility that the land will be used, in order to ensure that development can be forthcoming;
- Our client's site should be referred to within the document for the potential to accommodate uses in relation to demolition waste, waste transfer station and waste to energy facilities;
- Paragraph 3.46 and Policy SP5 of the Submission Draft Core Strategy sets out Dover's aims and objectives to promote a renewable energy and efficiency. Although we agree with these aims and objectives, as currently written, we consider that Policy CP5 is **unsound** as this does not set out enough detail for provision of new infrastructure related to renewable energy, or even explain that Dover will produce supplementary guidance on this topic. In order to become sound, we see that this policy needs to be re-worded to include reference to this new infrastructure, or a new policy could be inserted which refers to the council producing supplementary guidance pursuant to supporting proposals for renewable energy and waste recycling infrastructure.

Should these minor amendments to the Core Strategy be made, we consider that the document can be made sound. This will help to guide the future development within the administration area of Dover and ensure that Richborough Power Station can be developed for uses which assist in meeting the overarching infrastructure, waste and renewable aspirations of the council.

We trust that this brief outline of our points is of use to the inspector, however should you require any further information in advance of the hearing, please do not hesitate in contacting Jon Bradburn (020 7312 7452 or jon.bradburn@montagu-evans.co.uk) in the first instance, or Peter Bovill (020 7312 7456 or peter.bovill@montagu-evans.co.uk).

We look forward to receiving confirmation on the delivery of these representations.

Yours sincerely,



Montagu Evans LLP

CC. Chris Atherton