

**TONBRIDGE & MALLING BOROUGH COUNCIL**  
**PLANNING and ENGINEERING ADVISORY BOARD**

**28 February 2005**

**Supplementary Report of the Director of Planning & Engineering**

**Part 1- Public**

**Matters for Recommendation to Cabinet - Non-Key Decision**

**1 THE SOUTH EAST PLAN**

**Summary**

**This report introduces the consultation draft of the South East Plan that has been prepared by the South East England Regional Assembly (SEERA). The report highlights some key issues for the Borough particularly concerning future development provisions at sub-regional level and policies concerning infrastructure, affordable housing, environmental and employment issues.**

**1.1 Background**

- 1.1.1 The new Planning & Compulsory Purchase Act 2004 introduced a new development plan system which replaces County Structure Plans and Local Plans with Regional Spatial Strategies (RSS) and Local Development Frameworks (LDFs).
- 1.1.2 The South East Plan will be the RSS for this region and will set the broad planning context for future development for a 20-year period to 2026. The South East Plan will be part of the statutory planning framework and LDFs prepared by District Authorities will need to be in conformity with its general provisions. For example, targets for new housing developments set in the South East Plan will need to be reflected in the more detailed LDFs.
- 1.1.3 Whilst LDFs will be a more detailed and local expression of planning policy, the South East Plan will clearly be important in shaping the overall scale and pattern of development in the area for the foreseeable future. It is therefore important that every opportunity is taken to influence its direction and content.

**1.2 The Consultation Process**

- 1.2.1 The South East Plan has been prepared on a comparatively fast programme. Many have expressed the view that this has not enabled as full a debate about the content of the draft Plan as would be desirable and that both its content and the level of 'ownership' has suffered as a result. Nevertheless, the draft document is

now formally the subject of a public consultation period which will run until the 15 April.

- 1.2.2 The arrangements for the consultation that SEERA has made include a leaflet distributed to every household in the region, placing documents on deposit at key locations and staging a series of public meetings including one in each district council area. The meeting in Tonbridge & Malling was held at the University of Greenwich at Kingshill on the 15 February 2005 and a seminar for parish councils in Kent was held on the 18 February 2005. These meetings have been organised and led by the County Council on behalf of SEERA.
- 1.2.3 The current round of public consultation concerns region-wide policies and sub-regional strategies for areas such as the Kent Thames Gateway. Options for future housing provision are expressed at a sub-regional level. Consequently, there are no district level housing figures at this stage and SEERA propose that this will be the subject of a further round of public consultation. The timing of this further consultation and indeed the work required to reach that stage is still the subject of debate and it now looks likely to be delayed until much later in this year.
- 1.2.4 This two stage process is in itself undesirable as it will inevitably lead to a debate at district level divorced from the regional context. More importantly it will mean a debate at the regional level without a true indication of the local implications of future growth.
- 1.2.5 The whole plan was due to be submitted by SEERA to the First Secretary of State by the end of this year. This programme now seems almost certain to change. Following a Public Examination expected to take place during next year, SEERA anticipate that the final version of the South East Plan will be approved by the Secretary of State by the end of 2006 or more likely in early 2007.

### **1.3 The South East Plan Key Issues**

- 1.3.1 In the following paragraphs I have attempted to summarise what appear to be the key issues as they relate to Kent, south-west Kent and Tonbridge & Malling in particular. This is not helped by the fact that the plan itself is incomplete at this stage and the derivation of some of the policies is not clear. Nevertheless, at this stage in the process it is important that district councils are fully engaged in the process. In this respect we have been working closely with officers of the County Council and colleagues in districts to see how best the key issues can be represented. This work will continue so that as far as possible common issues across Kent can be strengthened by support from many local authorities. Work will continue particularly towards the district level housing provisions, which will ultimately be a critical part of the plan when it is finally adopted.

### **1.4 The South East Plan - Overall Approach**

- 1.4.1 The South East plan starts with some admirable objectives. It seeks to reduce economic and social disparities across the region, make a substantial increase in

affordable housing supply and plan for a timely provision of infrastructure which is described as a “**conditional growth**” approach. It has an objective to creatively balance support for regeneration and growth in the east of the region with a positive response to economic and housing pressures in the west. However, there is little in the plan to demonstrate how some of these objectives would be achieved. For example, I am not convinced that the policies will actually effect a redistribution of regional investment as they purport to do. Indeed, more economically buoyant areas to the west of the region including the western corridor are designated as “areas of economic opportunity” whereas areas such as the Kent Thames Gateway are now described as “regeneration areas”. There is little in the way of definition that can readily help the reader identify what precise degree of spatial policy and priority is going to be applied in the respective areas.

- 1.4.2 Similarly, there is a poor articulation of the intended relationships with adjoining regions and London in particular and how policies will deal practically with external pressure for development and transport provision.
- 1.4.3 The overall approach to infrastructure reflects concerns across the region that the provision of transport improvements and investment in the health sector in particular must run in advance or parallel to future growth. One of the crosscutting policies says that the final policies to be included in the plan will set out the mechanisms for phasing and managing land release that match the provision of infrastructure. There is, however, little to suggest how this is done in the plan as it has now been published. Whilst the overall approach might be welcomed, the detail of the funding and programming of infrastructure remains to be seen. Indeed, a further concern is that if the bulk of new infrastructure investment were geared to the growth areas it will be difficult to see how other areas, which may already be deficient in infrastructure would be adequately provided for.
- 1.4.4 There are many general policies in the plan that are to be welcomed. Policies on natural resources are generally sound and it is pleasing that there are no proposals to substantially alter Green Belt policy. Although in some locations it is difficult to see how these policies can be squared with some of the growth options that are being promoted as part of the consultation exercise.

## 1.5 **Housing Issues**

- 1.5.1 The South East plan includes three overall levels of housing provisions for the region as a whole for the period 2006-2026.
- a. 25,500 dwellings per annum
  - b. 28,000 dwellings per annum
  - c. 32,000 dwellings per annum.
- 1.5.2 These three options are then each the subject of two different approaches to distribution; one reflecting the continuation of existing regional policy towards

housing distribution and one described as “sharper focus” which is a distribution that focuses development on areas with strong economic potential and regeneration need. Thus there are six options overall which have then been distributed on the basis of sub-regions that SEERA has identified and the ‘rest of country’ areas that remain.

- 1.5.3 The result of this policy approach includes the following housing provision numbers for the various sub-regions as far as Kent is concerned. I will table a plan at the meeting to illustrate the sub-regions that have been identified by SEERA for this purpose.

**Continuation of existing distribution policy**

| <b>Distribution by area</b> | <b>25,500</b> | <b>28,000</b> | <b>32,000</b> |
|-----------------------------|---------------|---------------|---------------|
| Kent Thames Gateway         | 2,900         | 2,900         | 2,900         |
| London Fringe               | 1,500         | 1,700         | 2,100         |
| East Kent & Ashford         | 2,400         | 2,500         | 2,800         |
| Rest of Kent                | 700           | 800           | 1,000         |

**“Sharper Focus”**

| <b>Distribution by area</b> | <b>25,500</b> | <b>28,000</b> | <b>32,000</b> |
|-----------------------------|---------------|---------------|---------------|
| Kent Thames Gateway         | 2,900         | 2,900         | 2,900         |
| London Fringe               | 2,000         | 2,300         | 2,800         |
| East Kent & Ashford         | 2,600         | 2,800         | 3,100         |
| Rest of Kent                | 200           | 200           | 200           |

- 1.5.4 The key point to be made in respect of this housing distribution is that it seems to lack any robust analysis and understanding of the circumstances that apply in local areas and relies heavily on a ‘top down’ approach to policy application.

- 1.5.5 For example in the Kent Thames Gateway area which has a projection of 2,900 dwellings per annum under all of the options, the figures are simply a projection of current growth rates predicted on known development sites. However, the existing stock of sites are, of course, almost entirely brownfield but the projection of the growth rate would mean very significant loss of greenfield land (and probably green belt) which would entirely change the strategy and basis of the regeneration concept of the Thames Gateway strategy.

- 1.5.6 Equally, the figures for the 'Rest of Kent' (which includes those areas of Kent outside the identified growth areas) seem inappropriate and in some of the options do not reflect the current planning permissions that have been granted let alone future allocations that local authorities would wish to pursue and the likely level of urban capacity sites that are reasonably expected to come forward.
- 1.5.7 It is not helpful to say that the figures are necessarily too high or too low in any one area. What is clear however is that the figures in the two examples cited simply do not reflect what are well defined local strategies. The Borough Council has traditionally resisted any significant growth in the south and west of the Borough whilst promoting appropriate levels of development in parallel with infrastructure provision outside of the greenbelt in the northern part of the Borough. It has made a great effort to husband this land responsibly looking forward even beyond its own local plan time horizons. It would be highly regrettable if this approach were not reflected and sustained in the regional strategy.

## 1.6 **The Kent Thames Gateway - Area of Influence**

- 1.6.1 On a number of occasions during the preparation of the draft plan both members and officers have made efforts to clarify the role of the "Area of Influence". This is an area including Maidstone and the northern part of the Borough, together with parts of Gravesham, Dartford and Sevenoaks districts that lie directly south of the Thames Gateway growth area. Whilst we have supported its existence because of the need to attract transport infrastructure improvements to support the Thames Gateway, we have consistently been concerned that the Area of Influence would be seen by some as an overspill for the Kent Thames Gateway. This point has to some extent been clarified in the policies in the plan for the Kent Thames Gateway Sub-Region which says that development provisions for the Medway Gap will be determined by the local development frameworks and will not be linked to growth in the Kent Thames Gateway. However, at the very beginning of the South East Plan maps articulating levels of growth in sub-regions include the Area of Influence within the Thames Gateway growth area. **Clarification on this point must now be conclusively sought from the Assembly.**

## 1.7 **Affordable Housing**

- 1.7.1 The South East Plan seeks a substantial increase in the supply of affordable housing and proposes a regional target of 25% social rented and 10-15% of other forms of affordable housing from development sites that come forward. Although the plan makes reference to local housing market needs assessments, it is difficult to see how successfully and practically this policy can be applied at the local level when there is such variation in affordability across the region. A more appropriate approach would be to recognise that this is a priority for the region and give policy backing to the delivery of affordable housing in accordance with robust local market assessments.

## 1.8 **Housing Density**

- 1.8.1 In a similar fashion, the South East Plan puts forward a policy for an average density of 40 dwellings per hectare to be applied across the region. Whilst this level sits in the middle of the PPG3 'range' it does again seem quite inappropriate to establish a regional density average when PPG3 must always be taken into account by planning authorities and that particular local circumstances will inevitably apply on a case by case basis.

## 1.9 **Strategic Gaps**

- 1.9.1 Although the plan includes a policy to preserve strategic gaps, these are not yet identified in the work. It is vital for the Borough Council to make sure that the Maidstone/Medway Gap/Medway Towns strategic gap is afforded regional status within this plan to preserve its long-term sustainability and to assist the preparation of our LDF.

## 1.10 **Employment**

- 1.10.1 In terms of employment it is not easy to identify the linkage between future housing growth and employment levels to create more sustainable sub-regions and communities. The existing disparities across the region expressed in Gross Value Added £s per head shows Kent as a whole to be significantly behind most other counties. However, the policies of the plan do not clearly distinguish the approach to be followed towards prioritising opportunities for economic growth between areas of the region. Consequently, it is not easy to understand how business investment will be directed to those areas in most need and to ensure that employment growth advances in parallel with housing growth. There is no guidance in the plan on local provisions for specific employment sectors or general locations for employment generation.

## 1.11 **Transport Infrastructure**

- 1.11.1 The overall approach to identifying new investment in transportation schemes is very disappointing. The Regional Transport Strategy only looks forward to 2016 whereas the South East Plan takes the time horizon another 10 years forward to 2026. Bearing in mind the overall scale and distribution of development it would seem necessary to advance additional investment and proposals for transportation. I can find no proposals for future transport investment beyond those schemes already identified in current programmes and plans. In particular table 1 in the consultation draft does not include necessary widening and improvements to the M20 junctions 3-5 nor further improvements to the A228 that would be required to support growth in the Thames Gateway let alone accommodate local levels of growth and additional traffic generation on the strategic routes. In this respect the A228 and A229 in particular should be identified as important 'spokes' particularly as the investment approach is purported to follow a 'hubs and spokes' strategy (even if it might be hard to spot that approach being followed in the proposals of the plan themselves).

1.11.2 Tonbridge is identified on a plan in the document as a transport interchange, rather than a transport hub. At hubs the policy is to give priority to measures that increase the level of accessibility and also encourage development of 'higher order economic activity'. Interchanges obviously have a lesser but nevertheless important role although there is no specific policy articulating how that is to be achieved through planning policy. Tonbridge obviously has a key role particularly in terms of railway infrastructure being on a key radial line from the coast to London but also part of the east west mainline. Other locations having these characteristics have been identified as 'hubs' such as Redhill. Either the role of Tonbridge should be recognised as a transport hub or the priority for investment around transport interchanges needs to be giving a higher recognition that that currently in the plan. The latter would be entirely in line with the Council's planned approach to future investment and development in the town centre.

## 1.12 **Conclusions**

1.12.1 There is no doubt that the fast track programme for the preparation of the plan has given rise to inconsistencies and in some cases inappropriate balances in the policy provisions that it includes. This in turn has raised widespread concerns amongst local authorities in the region. Many parts of the plan are incomplete and in particular it is extremely difficult to provide a sound defence of the housing provisions that are proposed at a sub-regional level. On this aspect in particular it is critical that over the coming months the Kent districts and County Council work together to express a more realistic and achievable set of housing targets that continue to reflect regional priorities but add far more realism to local capacity and housing markets.

1.12.2 At this stage of the process it is proposed that the Borough Council submits a range of comments based upon the summary that is included within sections 1.4 to 1.10 in this report which seek to demonstrate the main concerns for Tonbridge & Malling and West Kent. It is also important for the Council in commenting at this stage to express its reservations about the programme for the next stage of the plan which will focus on district level housing provisions. The importance of getting this next stage right cannot be underestimated for local communities, as this will be critical to the preparation of subsequent Local Development Frameworks by District Councils.

1.12.3 There are a large number of more detailed comments and corrections that I would propose drawing to the attention of SEERA and I would hope that the Board would be content that I do this in consultation with the Cabinet Member for Planning & Engineering.

## 1.13 **Recommendations**

1.13.1 That the South East of England Regional Assembly **BE INFORMED** of the Council's views on the South East Plan Consultation draft as set out in sections 1.4 to 1.10 above.

1.13.2 The Assembly **BE INFORMED** that the Council believes that it is critical for both the accuracy and integrity of the planning process that the next stage of the work towards district level housing provisions must be properly programmed and enable a review of the sub-regional housing provisions and satisfactory opportunities for engaging local communities.

1.13.3 The Director of Planning & Engineering **BE AUTHORISED** to make a range of detailed comments to SEERA on the wording in the Plan in consultation with the Cabinet Member for Planning & Transportation.

Background papers:

Nil

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File ref: 16-2-11

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