

TONBRIDGE & MALLING BOROUGH COUNCIL
PLANNING and TRANSPORTATION ADVISORY BOARD

22 May 2006

Supplementary Report of the Director of Planning & Transportation

Part 1- Public

Matters for Recommendation to Cabinet - Non-Key Decision (Decision may be taken by the Cabinet Member)

1 SOUTH EAST PLAN – SUBMISSION TO GOVERNMENT

Summary

Following consultation during 2005 the South East Plan has now been submitted to the Secretary of State and is available for public comment prior to Public Examination later this year. Overall, the content of the Plan is now to be welcomed. Much of it can be supported, but there are a few remaining areas of concern where representations are recommended to be made.

1.1 Background

- 1.1.1 The South East Plan has now reached the stage of submission to the Secretary of State. It is on deposit until 23 June during which time representations may be made to the Secretary of State. There will be an Examination in Public starting in November this year, with sub-regional sessions during February and March next year. One of these sessions will be in Maidstone, though it is not yet entirely clear what the scope of such sub-regional Examinations will be.
- 1.1.2 The South East Plan has been prepared by the South East of England Regional Assembly (SEERA) in two phases. Consultation on a draft of the bulk of the document took place in February last year when the Borough Council made a number of representations on various issues. A revised draft of the document was then submitted to Government, on an interim basis, in July 2005.
- 1.1.3 In the autumn of last year the County Council, on behalf of SEERA carried out a consultation on the district distribution of housing, having been responsible for co-ordinating sub-regional work on this all-important subject over the summer. Your officers were closely involved in this work which was overseen by a Steering including the Cabinet Member for Planning and Transportation and myself. In response to this consultation the Council supported the overall housing figure for Tonbridge and Malling of 8,500 dwellings (2006-2026). It also supported a specific policy for the Rest of Kent Area and the identification of Tonbridge/Tunbridge Wells as a Regional Hub. On the other hand, it expressed some concern about

Maidstone Borough Council's aspirations for much higher levels of housing growth.

- 1.1.4 The results of the second round of consultation have been considered by SEERA and the subsumed into the July 2005 document that has also been updated and amended in a number of other respects. The revised document was submitted to Government at the end of March, which is somewhat later than originally intended.

1.2 The Submitted Plan

- 1.2.1 The content of the South East Plan is important. Under the new planning system, together with the LDF, it will comprise the Development Plan. In this respect, once approved, it will replace the Kent and Medway Structure Plan. Since its submission to the Secretary of State it is already a material consideration for development control. Furthermore it is the Plan that we are having regard to in preparing the LDF, since it will be approved at about the same time as the first tranche of the LDF is adopted early in 2008.
- 1.2.2 As a result of the response to consultation and our close involvement in the preparation of the sub-regional work I am pleased to say that the submitted version of the Plan is very much improved from its earlier drafts. However, there are still a few areas of concern which I deal with below.
- 1.2.3 The proposal for a policy for the "Rest of Kent", incorporating specific reference to Maidstone's ambitions, has not been included in the final version of the document. This is perhaps not surprising, in that there are a lot of other 'residual' areas throughout the South East that do not have their own specific policies. To accept the inclusion of such a policy in Kent may well have set a precedent. However, there is now a new dedicated policy (Policy CC8c) dealing with Tonbridge and Tunbridge Wells as a Transport Hub, which recognises their sub-regional importance and provides a useful basis for supporting appropriate development and infrastructure investment. This policy should be supported. The housing figures for Maidstone have not been increased, but there is a reference in a footnote to the Housing Policy (Policy H1) to the possibility of another 1000 dwellings being provided in Maidstone Borough, subject to work on their LDF.
- 1.2.4 Whilst there is not a "Rest of Kent Policy", there is a policy (Policy KTG11) dealing with the wider implications of growth in the Kent Thames Gateway. This makes reference to maintaining the Green Belt and Strategic Gap in Tonbridge and Malling; making improvements to road and rail connections between Maidstone/Medway Gap and Thames Gateway; and, more particularly, making it clear that Maidstone/Medway Gap will not be regarded as an overspill area for Kent Thames Gateway. This policy is to be welcomed.
- 1.2.5 In terms of housing numbers the submitted figure of 8,500 dwellings (2006-2026) is acceptable. This is an average requirement of 425 dwellings a year compared with 450 a year in the soon-to-be-adopted Kent and Medway Structure Plan, and compared with an average annual completion rate over the past three years of

648 dwellings per year. Work on the LDF indicates that there will be no difficulty in meeting this requirement and it should therefore be supported. However, Members should note that some flexibility will intentionally be built into the LDF to allow for any possible increase in the South East Plan figures. This is important, because whilst the overall requirement for the South East has been set by SEERA at 28,900 dwellings per year, the Government's latest projection of housing need in the South East is 36,600. It is expected that GOSE will object to the overall housing figures. This will undoubtedly be a matter for the Examination in Public. It is important that the Borough Council supports a figure for the Borough which is achievable without detriment to the environment but which is sufficient to meet locally generated needs. In this respect, it is much better for the Borough to have a surplus of supply rather than starting with a deficit. Happily we are able to adopt this position as a result of the Councils tradition of looking forward innovatively to provide for future housing needs in the Borough. The figure in the South East Plan should therefore be supported.

1.2.6 Overall there is much in the Plan that can be supported. Since it will undoubtedly come under pressure for change from other quarters, I believe it is important for the Borough Council to indicate its general support with the following specific exceptions where objections/representations should be made.

- The Plan now includes a new policy (Policy CC10b) dealing with Strategic Gaps. This is in line with representations previously made by this Council and the County Council. As such, it should be supported in principle, but in detail it has problems. For instance, it does not actually identify any regionally important Strategic Gaps. Instead, it is a criteria-based policy which requires local authorities to define them, but this is subject to their being defined only in joint LDDs if they cross district boundaries, which as strategic gaps, they are almost bound to. This would, in effect, require us to prepare our LDF jointly with Medway, Maidstone and possible Swale. Furthermore, it says that the gap must be no wider than 5 miles and must separate settlement of more than 10,000 population. Fundamentally, the whole basis of the policy is wrong in that it is seen as a countryside protection policy rather than an urban form policy aimed at maintaining the separation and separate identity of settlements. It is important that constructive representations are made that support the proper identification of Strategic Gaps in appropriate locations throughout the South East and that one such location should be the gap between the Medway Towns and the Maidstone/Medway Gap area.
- There is a concern at County level at the lack of any quantified guidance of the level of employment provision to match housing growth. This is particularly important in the growth and regeneration areas of Kent. The Plan effectively relegates the quantification of employment land requirements to locally-based Employment Land Reviews such as that carried out for our LDF last year. It would be expected that the Regional Strategy would provide some quantified guidance on what is required.

Without such guidance there is a fear that the strategy will fail to attract investment in the areas where it is needed which could result in long distance commuting or local unemployment.

- As a matter of detail on the Regional Transport Strategy, the Council should reiterate its concern that no “spokes” are identified between the joint Hub at Tonbridge/Tunbridge Wells and Maidstone (thereby supporting the Colts Hill Link), or between Maidstone/Medway Gap and the Medway Towns (thereby supporting investment in the A228, A229 and the Medway Valley Line).
- Policy NRM2 is a new policy dealing with water resources which includes specific reference to possible investment in water supply reinforcement. Specifically it refers to enlargement of the Bewl reservoir by 2014/15 and a new reservoir at Broad Oak in East Kent by 2019/20. Whilst these proposals should be welcomed, the degree of commitment to their implementation should be clarified. There must also be a serious question about their timing in view of the climate change characteristics being experienced and the current water shortages which can only get worse as a result of the development proposed in the Plan.
- The Borough Council previously supported the County Council and others in challenging the South East Plan to identify areas of regionally significant landscape quality, in addition to the nationally defined Areas of Outstanding Natural Beauty. Objection should be raised to the fact that the South East Plan includes no designations the equivalent of the Special Landscape Areas in the Kent and Medway Structure Plan.

1.2.7 The South East Plan is accompanied by an **Implementation Plan** which includes in an Annex what is described as a “Sub-Regional Investment Framework”. This is said to be work in progress and, indeed, we have been consulted at officer-level about what it should include. There are a number of important omissions which I have notified to the County Council which is co-ordinating this work, but I believe representations should also be made directly to the Secretary of State on this matter at this stage. One of the fundamental problems is that the Implementation Plan only relates to investment in the defined sub-regions, none of which impinge on the Borough. By implication, there is to be no planned investment in infrastructure in Tonbridge and Malling of regional or sub-regional significance, but this is not the case, as evidenced by the following infrastructure projects that are currently missing from the Investment Plan.

- M20 Junctions 3 to 5 improvement including improvements to Junction 4, necessary to support growth in Thames Gateway by sharing traffic with A2/M2 (Policy KTG11).
- Improvements to A229 and A228 (Snodland Bypass widening) to support growth in Thames Gateway (Policy KTG11).

- Improvements to the Medway Valley Line to support growth in Thames Gateway (Policy KTG11).
- Investment in transport infrastructure within Tonbridge Central Area (including Tonbridge Station Interchange and the London Road/Hadlow Road Link) to support its role as a Regional Hub (Policy CC8c).
- Improvements to the (missing) spoke linking the Tonbridge/Tunbridge Wells Hub with the Maidstone Hub (eg Colts Hill Link) to support their hub function (Policy CC8c).

1.3 Legal Implications

1.3.1 None

1.4 Financial and Value for Money Considerations

1.4.1 It is important that the Council ensures the best level of investment it can in infrastructure in the Borough to support the growth agenda of the South East Plan.

1.5 Risk Assessment

1.5.1 If these matters are not pursued there is a risk that development will occur which will impact upon the Borough without the appropriate level of investment in infrastructure.

1.6 Recommendation

1.6.1 The Borough Council indicates its general support for the policies of the South East Plan with the exception of the specific points raised in this report which should be lodged as formal representations on the submitted document.

The Director of Planning and Transportation confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and Policy Framework.

Background papers:

Report to Planning and Engineering Advisory Board 28
February 2005
Report to Planning and Transportation Advisory Board 23
May 2005
Report to Cabinet 7 September 2005
Report to Planning and Transportation Advisory Board 24
October 2005

contact: Brian Gates
File ref: 16-2-11

Steve Humphrey
Director of Planning & Transportation