

TONBRIDGE & MALLING BOROUGH COUNCIL

PLANNING and TRANSPORTATION ADVISORY BOARD

24 July 2006

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 THE SOUTH EAST PLAN

Summary

This report is to update Members on some important emerging matters in relation to the South East Plan process.

1.1 Background

- 1.1.1 Members will recall that the South East of England Regional Assembly (SEERA) submitted its draft South East Plan to the Government at the end of March this year. There then followed a period of statutory consultation and the Borough Council duly submitted its various comments following consideration by this Board.
- 1.1.2 The next important stage in the process will be a public examination into the Plan which is due to start in November and continue into 2007. At present there are no details of precisely how the public examination will be conducted, which parties will be invited to appear and what level of detail the examination will deal with. It is planned for parts of the public examination to be held at various locations around the region to examine sub-regional issues and currently it is expected that the Borough Council will have an opportunity to take part at that stage whenever it is programmed.
- 1.1.3 Very recently an important piece of work has emerged that is likely to be influential at the public examination and has raised procedural issues. Members may remember that when last year SEERA consulted on the preferred level and distribution of housing development, the Government Office for the South East (GOSE) indicated that it felt the figures were too low. Subsequently the then Office of the Deputy Prime Minister (ODPM) commissioned some work to provide further technical advice to the Government on the distribution of housing in the South East. This work has been carried out by Roger Tym & Partners, Planners & Development Economists, who were given a brief to develop an appraisal of alternative options for accommodating housing and associated growth **additional**

to the amount proposed in the South East Plan. The outcome of this work has recently been published with a view to informing the debate at the Public Examination and is now subject to careful examination and scrutiny by interested parties around the region.

- 1.1.4 The emergence of this work raises two fundamental issues; one of technical substance and the other of process.
- 1.1.5 Dealing firstly with the overall findings of the work by Roger Tym & Partners, officers will need to spend considerable time jointly with KCC and other Districts analysing the basis for their assumptions and the testing of various additional levels of development they have put forward. It has not been possible to carry out a detailed evaluation of the work since its recent publication because of the lack of base information. This will be a task as we move through the autumn towards the public examination.
- 1.1.6 Nevertheless, it is important that Members appreciate that the work considers development scenarios for the region at considerably higher levels than the submitted draft South East Plan and puts forward a district level distribution for testing purposes.
- 1.1.7 Tym's say that the options they have developed take account of the increase in household numbers including the latest household projections, forecast of migration, the backlog of housing need and links with economic growth. Members may recall that the overall housing figure currently in the submitted draft South East Plan is 28,900 dwellings per annum from the period between 2006 and 2026. The work by Roger Tym & Partners has produced five alternative growth options ranging from an additional 4,100 dwellings per annum up to an additional 17,100 dwellings per annum for the Region. The distribution of new housing under each of the five alternative growth options is based upon different demographic forecasts, distributions aligned with predicted employment and economic growth and distributions based upon the concentration of more development in and around current urban areas.
- 1.1.8 Whilst it has not been possible at this stage to fully examine the assumptions made behind these various alternatives, officers do have some initial doubts about the robustness of the approach, for example the identification of unconstrained sites around existing urban areas in this part of Kent seems to be highly questionable.
- 1.1.9 At the district level the South East Plan puts forward a development rate of 425 dwellings per annum for Tonbridge & Malling which is reflected by the Councils emerging Local Development Framework. The five alternative growth options tested in this new work would increase this by between 60 and 192 dwellings per annum. Again, it is difficult at this stage to follow the analysis that has led to this level of detailed distribution but clearly these levels of increase for the Borough would raise issues that need very careful consideration.

- 1.1.10 The Roger Tym report does draw attention to constraints in respect of various matters such as road and rail infrastructure, water supply and other areas of environmental impact. It also makes it clear that in the higher ranges significant areas of greenfield land release would be required at many locations across the region including growth areas such as the Thames Gateway. The consultants, quite rightly, draw attention to the severe limits of environmental and infrastructure capacity in many sub-regional locations.
- 1.1.11 It is the government's intention to present this alternative growth scenario testing to the public examination. This raises some fundamental points of principle in relation to the process that has been followed. One of the functions of the Regional Assembly bestowed upon it by Government is to prepare the South East Plan and submit it to Government for consideration. Whilst there have been various observations made about the accountability of that process and the ability of local communities to be engaged, SEERA has nevertheless done its best to submit a plan to Government that takes account of many of the strategic pressures in the region. In the meantime it now seems that the Government has commissioned consultants with the specific remit of advancing and testing some alternative and very much increased growth scenarios which it now intends to present to an Inspection Panel that the Government itself has appointed.
- 1.1.12 The emergence of the detailed work also raises significant questions about the opportunities for district councils and local communities to make representations. The work of Roger Tym & Partners takes their alternative growth scenarios down to district level. It is quite clear therefore that all district councils in the region are likely to wish to test and question that work. I have considerable misgivings whether the current timetable emerging for the public examination will have the capacity to be able to deal with these matters in the required level of detail.

1.2 Conclusion

- 1.2.1 I am bringing these matters to Members attention because I foresee that the emergence of this work will cause serious concerns throughout the region. At the very least it seems to me that the Council would wish to have more clarity about how this matter is going to be dealt with at the public examination and what opportunity the Borough Council, other local authorities and various partners will have to make representations at a detailed level.
- 1.2.2 There is also some detailed technical work by way of assessing the robustness of the Roger Tym report that needs to be undertaken. I am sure that the County Council and other districts in Kent will have a keen interest to do this in a collaborative fashion which I think will be helpful when we eventually get to the public examination.

1.3 Legal Implications

- 1.3.1 None directly arising from this report.

1.4 Financial and Value for Money Considerations

1.4.1 None directly arising from this report.

1.5 Risk Assessment

1.5.1 The risk to the Council's future development strategy is significant should any of the higher development scenarios ultimately be included in the South East Plan.

1.6 Recommendation

1.6.1 The update given in this report **BE NOTED**.

1.6.2 Officers **UNDERTAKE** further technical assessment of the work carried out on behalf of the government in partnership with other local authorities in the County.

1.6.3 Concern **BE RAISED AND CLARIFICATION BE SOUGHT** from the government about the process to be adopted from now on and particularly at the public examination.

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

Background papers:

Augmenting the Evidence Base for the Examination in Public of the South East Plan – Roger Tym & Partners
May 2006.

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