



www.tmbc.gov.uk/localplan

localplan@tmbc.gov.uk

Catherine Smith
Medway Council

Contact	Jenny Knowles
Email	Jenny.Knowles@tmbc.gov.uk
Date	12/10/2023

Dear Catherine,

Re: Medway Local Plan Regulation 18 consultation

Thank you for consulting Tonbridge and Malling Borough Council (TMBC) on the Regulation 18 Local Plan. Having considered the document, we wish to make the following comments.

TMBC understand that the Regulation 18 Local Plan sets out the vision, strategic objectives and outlines potential options for where new homes, workplaces and services may be built. Strategy options being considered include urban regeneration, suburban expansion, rural development and Green Belt sites. We acknowledge that it does not detail policies or identify those sites preferred by the Council for new development and that this detail will come in the next stage of work on the Local Plan, due to be published next year. Consultation runs from Monday, 18 September to Tuesday, 31 October 2023.

We note that Medway has an identified housing need for 1,667 homes a year, or around 28,500 over the plan period to 2040. Taking into account sites with planning permissions but not yet built, and a windfall allowance, the Council is assessing options to allocate land for over 19,000 new homes to meet needs in Medway. In addition, the Medway Employment Land Assessment, 2020 indicates a need for c 62.3 hectares of employment land up to 2037. The majority of the land would be needed for warehousing and distribution activities.

We also note, that following a request from a neighbouring borough, Medway Council must consider if there is capacity to provide up to an additional 2,000 homes to help meet Gravesham's housing needs.

Within the document, two sites are identified that have potential cross-boundary implications for Tonbridge and Malling. One is a large site located to the south-west of Halling,

Planning Policy, Gibson Building, Gibson Drive, Kings Hill, West Malling,
Kent ME19 4LZ

Director of Planning, Housing & Environmental Health:
Eleanor Hoyle (MA)
Head of Planning: James Balley

Have you tried
contacting us at
[www.tmbc.gov.uk/
do-it-online?](http://www.tmbc.gov.uk/do-it-online?)

immediately adjacent to the borough boundary. The second is a site at Rochester Airport identified for employment uses, which includes land within Tonbridge and Malling.

Site south-west of Halling: CHR4

The site south-west of Halling lies adjacent to the borough boundary. Land immediately to the south of this site, within Tonbridge and Malling, has been submitted for consideration through our own Call for Sites exercises. TMBC are currently gathering evidence to support plan preparation, and as a result no decisions on potential allocations have yet been made. We acknowledge that there may be potential cross boundary issues should these sites be supported through our respective Local Plans and are happy to work together as needed.

The site south-west of Halling lies in the Green Belt and in the setting of the Kent Downs Area of Outstanding Natural Beauty (AONB). Regard should be had to potential impacts on the protected landscape in this location, both alone and in combination. The site is also in close proximity to the North Downs Woodland Special Area of Conservation (SAC), located to the west. Regard should be had to potential likely significant effects on this designated site and if allocated, the site should be tested through the Habitats Regulations Assessment accompanying the Local Plan. Although we understand no decisions have been made on sites, if you were minded to proceed with this site, we would suggest the further work would be required to understand the impacts on Green Belt, the protected landscape and its setting, as well as the internationally protected wildlife site.

In addition, the council would expect detailed transport modelling to be undertaken to investigate the potential traffic impacts of this site on the A228, ideally using the Kent Model. Our published [Initial Baseline Transport Assessment](#) that accompanied our Reg18 Local Plan consultation, confirms the location of junction and link hotspots at the 2019 baseline year. These include sections of A228 (between Holborough Road and Rochford Road), which exhibit severe levels of delay (LOS E and F and V/C > 85%). (Paragraph 5)

The report further concludes at paragraph 4.5.1 that when comparing the 2040 and 2019 models, a significant increase in traffic is predicted along major corridors including the A228. More recent modelling work undertaken in relation to the Lower Thames Crossing DCO Examination further confirms the potential deterioration in the operational capacity of the A228 and its junctions due to the potential combined impacts of local growth and Lower Thames Crossing.

Given the scale of this site, highways mitigation would be required due to additional traffic volume and queueing at junctions which will include Peters Village and Holborough roundabouts as well as the Snodland bypass in Tonbridge and Malling, which becomes congested at peak times due to the single carriageway narrowing between Holborough Road and Rochford Road junctions.

Site at Rochester Airport: FH1

The employment site at Rochester Airport spans the borough boundary and identifies land within Tonbridge and Malling. This site has not previously been promoted to TMBC through our Call for Sites exercises. However, the site appears to be the site of Innovation Park Medway which is to be delivered in accordance with the terms of the Local Development Order (LDO). TMBC are happy to engage in cross-boundary discussions regarding this site, and to continue to work together on the LDO and masterplan for the site.

Other comments

In addition to the sites discussed above, it would also be useful to understand how the yield figure of 38,200 homes in paragraph 5.15 has been generated.

Finally, paragraph 5.26 identifies that some sites identified have not been proposed by landowners. TMBC welcomes the intention of Medway Council to engage in further discussions with landowners/promoters to determine the availability of these sites.

Yours sincerely,

Jenny Knowles
Principal Planner
Tonbridge and Malling Borough Council

Direct line: 01732 876273