

**From:** [policy\\_planning](#)  
**To:** [localplan](#)  
**Subject:** Local Plan (Regulation 19: Pre-submission) consultation  
**Date:** 19 November 2018 15:30:22  
**Attachments:** [Letter - TMBC Reg19 LP response - 19 Nov 2018.pdf](#)

---

Hi

Please find attached our response to your Local Plan regulation 19 consultation.

Kind regards

**Planning Policy | Medway Council**

Gun Wharf, Dock Road, Chatham, ME4 4TR

Direct dial: [\[REDACTED\]](#) Web: [medway.gov.uk](http://medway.gov.uk)

Please contact: Tim Stephens  
Our ref: TMBC 191118 - LPCon  
Your ref:  
Date: 19 November 2018



Ian Bailey  
Planning Policy Manager  
Tonbridge & Malling Borough Council  
Gibson Building  
Gibson Drive  
Kings Hill  
West Malling  
Kent  
ME19 4LZ

**Planning Policy Team**  
Planning Service  
Medway Council  
Gun Wharf  
Dock Road  
Chatham  
Kent ME4 4TR

Telephone: 01634 306000

Direct line: [REDACTED]

Email: [futuremedway@medway.gov.uk](mailto:futuremedway@medway.gov.uk)

**BY E-MAIL ONLY**

Dear Ian,

### **Tonbridge and Malling Borough Council Local Plan (Regulation 19: Pre-submission) consultation**

I write on behalf of Medway Council in response to the Tonbridge and Malling Borough Council Pre-submission Local Plan, which was published for public consultation on 1st October 2018.

#### **Medway Local Plan**

Medway Council is currently preparing a draft Local Plan to set out the strategy for development up to 2035, and we welcome your engagement in the associated consultation work and wider Duty to Cooperate considerations. Officers continue to support collaborative working to achieve coordinated approaches to cross border matters. We will contact you shortly to develop this work into a Statement of Common Ground, as now required to support our plan making.

#### **Representations on the TMBC Local Plan Regulation 19 consultation**

Medway Council recognises the pressures on your authority, shared across many authorities in Kent, to meet the scale of development needs identified, whilst delivering sustainable growth that protects environmental assets and does not compromise infrastructure capacity. We recognise the steps your authority has taken to positively prepare a plan seeking to meet development needs. Medway Council acknowledges that the proposal to review the Green Belt boundary to accommodate growth avoids a request for neighbouring boroughs to accommodate unmet housing needs.

We note that you are preparing your Local Plan under the transition arrangements, and therefore a number of approaches will be at variance to the draft Medway Local Plan. The preparation of the plan under the transition arrangements means that some potentially significant matters, such as the Lower Thames Crossing, have not have been addressed in the plan, due to lack of published information. We anticipate that the first five year review of the TMBC Local Plan will need to take

account of government's preferred method for calculating Local Housing Need, and that this may result in a higher scale of development needs in the borough. We will continue to coordinate work on growth strategies, so that cross border impacts of development can be appropriately considered and addressed. Given proposals such as the Lower Thames Crossing and the location of a number of strategic development sites close to the borough boundary, we anticipate further detailed technical assessments of impacts.

We question when you may be seeking to update documents to reflect new planning policy and guidance.

We note that you have prepared a succinct draft plan to present an accessible document that focuses on the proposed growth strategy, and strategic level policies. We support this general approach, but consider in some policy areas the lack of detail may limit the effectiveness to achieve the sustainable development ambitions set out in the plan.

We have a number of comments on some policy areas and the associated evidence base. These are set out under key headings in line with the guidance set for the representations.

## **Housing**

Medway Council notes that the proposed growth strategy includes a number of sites to the north of the borough. As acknowledged in previous correspondence, the northern parts of your borough share a housing market area with Medway. The further development around Bushey Wood, Eccles is likely to generate additional traffic using the recently constructed bridge over the Medway, and with that the A228. We cannot identify specific evidence that shows how the potential impacts of strategic development in this location on the wider area have been considered.

We note the proposed production of masterplans for both sites and appropriate transport assessments. We would wish to be consulted in relation to the anticipated need for 'improved connectivity to the strategic transport network'.

We also note the impact the Government's standard method for calculating Local Housing Need would have on a future housing target for Tonbridge & Malling and the potential challenges this may present.

## **Employment**

Medway Council notes the conclusions of the 2017 Employment Land Needs update of an objectively assessed need for 85.9ha of employment land up to 2031, with an emphasis on warehouse floor space demand over office land. We note the greater shortfall in land to accommodate future B1c, B2 industrial and B8 warehouse uses than previously estimated in the 2014 assessment.

We support the allocation of employment land near Rochester Airport, in line with our joint plans for Innovation Park Medway.

Medway Council notes the allocation of the Former Aylesford Newsprint Site, New Hythe (LP35) as the largest employment site in the borough to support light industry, general industry and storage & distribution. We look forward to seeing the masterplan which will be prepared to address matters relating to the impact on the highway network.

## **Gypsy & Travellers**

In terms of policy LP38, we agree that the policy is justified, however in terms of the effectiveness of the policy, we note that there is no mention of transit provision, which is a cross boundary issue and tests if the policy is deliverable. We consider that the policy seeks to meet the minimum need for G&T accommodation.

We would like to point out that the methodology used by your consultants to produce the Gypsy and Traveller Accommodation Assessment varies from that used in our respective evidence base document. We are not in agreement on the use of pitch turnover to contribute to supply. This is an important component of satisfying development needs. We would ask that this is kept under review as part of the monitoring framework for the implementation of the plan.

## **Transport**

The study area for the Transport Assessment (June 2018) appears to be limited to 30 junctions within Tonbridge & Malling administrative area, two junctions in the Maidstone administrative area and one junction in the Tunbridge Wells administrative area. The Transport Assessment excludes junctions within the Medway administrative area.

It should be noted that Tonbridge & Malling and Medway share a common Travel to Work Area; the relationship between the two areas is highlighted through analysis of the 2011 Census commuting flow data. The combined commuting flow between Tonbridge & Malling and Medway by all modes amounts to 8,877 journeys, of which almost 9 out of ten are by car/van. Tonbridge & Malling is the third highest destination (as an individual administrative area) for out commuting from Medway.

It would be prudent to either acknowledge the outputs of traffic modelling findings to date provided by Medway, or to incorporate M2 junctions 2 and 3 in any update to the VISUM model to reflect the scale of growth in Medway. This may also help in demonstrating the impact of growth in Tonbridge & Malling on the Strategic Road Network to Highways England.

Any further strategic traffic modelling should also take account of the proposed Lower Thames Crossing (LTC). Highways England's current LTC consultation provides an opportunity to ensure that the assumptions for growth in Kent are accurately represented in the Lower Thames Area Model and are not limited to background traffic growth. This reinforces the need to extend the VISUM model study area, given the likely increase in demand for the A228 and A229.

We note that the strategic LP23 Sustainable Transport policy is in line with the revised NPPF, but suggest the policy could highlight how it adds value over and above the revised NPPF.

The policy is potentially compromised however by the '*where practicable and proportionate*' wording throughout. This could lead to a focus in Transport Assessments to demonstrate that it is not practicable or proportionate to provide for sustainable transport.

### **Infrastructure**

Policy LP10 appears to be too brief; it does not make any mention of how infrastructure is to be delivered and implemented. We would expect this policy to reference at least developer contributions (CIL or S.106). As the delivery of infrastructure is critical to the achievement of sustainable development, it may be helpful to strengthen this policy area.

### **Duty to Co-operate**

We would like to take this opportunity to confirm that we remain committed to ongoing collaborative working to not only satisfy Duty to Cooperate requirements but also to ensure our future plans are effective and well considered. We will take this forward through the Statement of Common Ground.

In the meantime if you would like to discuss any of the issues raised in this letter further, please do not hesitate to contact me.

Yours sincerely,

