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Planning Policy
Regeneration, Culture,
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Medway Council
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Contact Jenny Knowles
Email [Redacted]
Your ref.
Our ref.
Date 21/06/2018

Dear Catherine

Re: Medway Council Local Plan 2012-2035 (Development Strategy Regulation 18 Consultation Report

Thank you for consulting Tonbridge and Malling Borough Council on the above document. We submit the following comments as representations to the Medway Council Local Plan 2012-2035 Development Strategy Regulation 18 Consultation Report.

We are encouraged to see that Medway Council appear to be seeking to provide a supply of land to meet the housing needs of 29,463 over the plan period within its administrative area. However it is not clear if Medway Council will be able to meet the proposed standard method for calculating Local Housing Need figure of 37,143 units. At present none of the suggested scenarios appear to meet this figure, and it is unclear at present on the potential yields and phasing from the possible development to support the delivery rates suggested. Clarification on whether Medway Council would be seeking neighbouring authorities to help meet any shortfall would be welcome as would more detailed information on specific site locations, phasing and yields.

We are pleased to see reference to a shared housing market area between Medway and Gravesham Borough Council. However we would like to reiterate those comments made by ourselves during the Medway Local Plan: Issues and Options Consultation in March 2016 and the Development Options Regulation 18 Consultation in April 2017 regarding the Housing Market Area as defined in the Strategic Housing Market Assessment Final Report (November 2015):

“The conclusion on the appropriate Housing Market Area (HMA) for Medway is questioned in light of the evidence presented and taking into account recent Strategic Housing Market Assessments

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prepared by neighbouring authorities including Tonbridge & Malling Borough Council (TMBC).

In light of the evidence on property values including median house prices (see Table 15 and paras.2.87 and 2.101 in the Strategic Housing Market Assessment (SHMA)) and detailed analysis of travel to work patterns and commuting (see para.2.98 in the SHMA), it is considered that including the whole of Tonbridge & Malling Borough in the Medway HMA is an over-simplification that does not accurately reflect the strengths of relationships between Medway and the surrounding areas.

The SHMA on more than one occasion identifies that the strong links with Tonbridge & Malling occur only within the northern parts of that Borough. This is summed up in para. 2.104 of the SHMA. If the evidence points to clear splits across neighbouring authority areas then this should be reflected in the final conclusion on the HMA. Unless the SHMA points to the rest of TMBC sharing similar characteristics in terms of market values and travel to work patterns and commuting then the middle and southern parts of TMBC should not be covered by the Medway HMA.

This more refined analysis would also be more consistent with the conclusion on HMAs exerting an influence over Tonbridge & Malling Borough in the TMBC SHMA.

A more appropriate HMA for Medway would exclude the majority of Tonbridge & Malling Borough with the exception of the northern reaches. Para. 2.101 in the SHMA identifies these northern reaches as being those areas north of the London-Maidstone rail line. This is borne out by the evidence on property values (including medium house prices) and detailed analysis of travel to work patterns and commuting which identifies that the strong links with TMBC do not extend below the northern part of that borough closest to Medway. This would be more consistent with the conclusion on the HMAs exerting an influence over Tonbridge & Malling Borough in the TMBC SHMA. Please see response to question 4 (above)."

In relation to Rochester Airport, Tonbridge and Malling Borough Council and Medway Council have undertaken cross boundary project work together for the future of this site which falls within both administrative areas. This collaborative work does not appear to have been acknowledged within the current consultation document. We would welcome reference to this work as part of the Duty to Cooperate.

We would like to draw to your attention to the following evidence that TMBC have recently published, which may provide useful background information as well as data for helping to assess *in combination* impacts:

- Air Quality Assessment (June 2018)
- Transport Assessment (June 2018)
- We have also commissioned some additional work to model the proposed mitigation measures set out in our Transport Assessment, and the impacts these may have on the highway network. Once complete, this will be made available via our website.

We are mindful of the recent publication by the Office for National Statistics of the 2016-based Sub-National Population Projections. You may wish to consider the implications of this dataset and the 2016-based Household Projections that will follow in September for your Objectively Assessed Need.

We look forward to continue working together as our respective Local Plans progress and are happy to engage in work on Statements of Common Ground with Medway Council, as necessary.

Yours sincerely

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