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Planning Policy  
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Medway Council  
Gun Wharf  
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ME4 4TR

Contact Jenny Knowles

Your ref.

Our ref.

Date 13/04/2017

Dear Catherine

**Re: Medway Council Local Plan 2012-2035 (Development Options 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 Options Regulation 18 Consultation Report.

We are pleased 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 the ability to do this within the authority boundaries is unclear at present as there is insufficient information regarding the potential yields and phasing from the possible development options to support this aspiration. 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.

In relation to the Strategic Housing Market Assessment Final Report (November 2015), we would like to reiterate those comments made by ourselves during the Medway Local Plan: Issues and Options Consultation in March 2016 regarding the Housing Market Area:

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

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Director of Planning, Housing & Environmental Health:  
Steve Humphrey (MRTPI)  
Chief Planning Officer: Louise Reid (MRTPI)

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*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)."*

We understand that the starting point for the Objectively Assessed Need (OAN) for housing as set out in the Strategic Housing Market Assessment is the 2012-based Household Projections. We are aware that the 2014-based Household Projections were published by the Department for Communities and Local Government in July 2016. This latter set of projections has informed the OAN in the emerging Local Plan being prepared by Tonbridge & Malling Borough Council. In the interest of consistency and currency, we consider that the evidence behind the OAN needs to be updated to take account of the latest set of projections, as recommended in the Planning Practice Guidance.

In addition, we have some concerns regarding the impact of the possible loss of Lodge Hill as a potential allocation in the Local Plan following the outcome of the Public Inquiry. Further information on how and where this shortfall would be re-provided, and assurances that this could be met within the authorities boundaries would be welcome.

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.

With regard to any Habitats Regulations Assessment, Policy Approach: Strategic Access Management and Monitoring (p.63) states that development within 6km of the SPA and Ramsar sites could impact on these resources. However para 7.10, although referring to SAC which have the same level of protection, a similar 6km buffer zone is not referred to. There are a number of SAC sites that are located outside of Medway but within 6km of the boundary including the North Downs Woodland and Peters Pit which fall within Tonbridge and Malling. We would like to see the potential impacts on these sites considered both individually and cumulatively as part of the Screening Report, which at present does not appear to form part of the evidence base.

We look forward to continue working together as our respective Local Plans progress.

Yours sincerely

Jenny Knowles  
Senior Planning Officer (Policy)

