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(BY EMAIL: planning.policy@medway.gov.uk)

Date: 01 February 2017

Dear Ms Smith

MEDWAY COUNCIL LOCAL PLAN 2012-2034 – DEVELOPMENT OPTIONS REGULATION 18 CONSULTATION

Thank you for the opportunity to comment on this stage of the Medway Local Plan. As you may be aware, Maidstone Borough Council received the Inspector's Interim Findings in December 2016, and has within the last couple of weeks completed the last scheduled session of the Examination in Public hearings. A series of Main Modifications to our Local Plan will now be subject to public consultation during spring 2017.

In regards to the Medway Local Plan Development Options consultation, the Borough Council wish to make the following representations.

Duty to Cooperate

MBC would like to confirm its agreement to the position set out in paragraph 2.30 of the Local Plan that states that Medway Council has engaged in 1:1 meetings with local planning authorities, insofar as MBC is concerned. Officers at MBC look forward to continuing to work closely and constructively with Medway Council on relevant cross boundary matters between the two authorities.

Housing Target and Strategic Housing Market Assessment

MBC notes the Objectively Assessed Need (OAN) of 30,000 new homes within the North Kent Strategic Housing and Economic Needs Assessment (SHENA) and the Regulation 18 Local Plan sets a housing target commensurate with this to deliver sufficient land for up to the 30,000 dwellings. Paragraph 3.7 identifies a pipeline of 18,206 dwellings and the plan identifies a range of development options to meet Medway's housing needs over the plan period, including; maximising the potential of urban regeneration, suburban expansion, Hoo Peninsula focus (Rural focus) and Urban Regeneration and Rural Town. Whilst it is acknowledged that these options are a starting point for the consideration of the development strategy and allocations for the new Local Plan, we have some initial comments on the development options that are set out below. Going forward we welcome being consulted on more specific details at future stages in the plan making process.

MBC is supportive of Medway's approach to meet its needs within its administrative area and we agree with paragraph 3.9 which states that it is unlikely that the full range of development needs could be met solely in the identified regeneration areas on brownfield land. It is noted that three of the development options include development around Rainham and Hempstead, which could have a significant impact on M20/J7 and the southern end of the A249. This junction already suffers from traffic congestion at peak times and requires capacity improvements in order to accommodate planned growth in Maidstone borough. Development across Medway is likely to impact on the highway network at Bluebell Hill, M20 J6 and potentially at Boxley Road. It is important therefore that the potential impacts of Medway's proposed growth on the road network within Maidstone borough are properly assessed through the emerging Local Plan.

The promotion of the Capstone Valley as a green infrastructure allocation is welcomed by MBC. This allocation recognises the high quality landscape of the Capstone Valley and maintains the separation of Medway and Maidstone.

Medway Council will be aware of our previous concerns in regards to the housing market area geography analysis within the SHENA, as set out in our response to the Medway Council Issues and Options consultation and set out by email on 27 October 2015.

Paragraph 2.103 and 2.104 of the SHENA recognises that whilst there are strong relationships between Medway and Maidstone, they are however not consistent across the full local authority area. We welcome recognition in the SHENA that the

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strongest relationship is with the north of the borough. This is in line with the Maidstone Local Plan Inspector who has concluded in his Interim Findings (ED:110) that there is a small part of the Borough's existing stock that abuts the Medway towns, however there is little development potential in that area and it is appropriately included in the Maidstone HMA for the purposes of the assessment.

Employment

It is noted by MBC that Medway commissioned an Employment Land Needs Assessment in 2015 that projected the growth of 17,000 jobs and the need of 90ha of employment floorspace in Medway over the plan period. The findings indicate that although there is a potential surplus of employment land available, this existing land supply does not align well to business needs. Paragraphs 5.19-5.21 suggests that the employment needs could be met through retention of existing employment sites, support for enhancing and consolidating current sites to better meet the market's requirements, by making better use of existing sites, and by identifying additional locations. It is noted that the legend for the development options shows 828ha of new/enhanced employment land however we would welcome clarification on the potential quantum and location of new employment floorspace.

We would welcome more detailed discussions through the DtC if the sites in the Lordswood area and at M2 J4 are progressed. These areas are close to the boundary with Maidstone and development of these areas could have implications in terms of infrastructure provision, including potential highway impacts, within Maidstone borough in the future.

The proposed policy approach for employment states on page 47 that Medway will support actions, amongst other things, to accrue benefits for Medway's economy from strategic developments of infrastructure, housing and employment sites outside the Medway area. The implications of this statement for development in Maidstone are unclear and we seek clarification on this matter.

Transport

MBC notes section 11.8 of the Plan which states that Medway Council has commissioned a new strategic transport model to support the emerging Local Plan, which is anticipated to be completed by spring 2017. This model will be used to assess the cumulative impact of development and associated mitigation strategies for the plan period. As set out above, we would expect that the potential impacts on Maidstone borough would be appropriately assessed through the modelling work.

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MBC supports the ambitions contained within this chapter to increase sustainable modes of transport, such as public transport provision and improvements to the walking and cycling network. Medway and Maidstone have good transport connections through both rail and bus services and we welcome further discussions on potential improvements to transport networks between Maidstone and Medway.

Gypsy and Traveller Accommodation

It is noted that Medway Council is seeking to refresh its evidence base for the assessment of the need for gypsy, traveller and travelling showpeople accommodation, in line with the Government Policy issues since the 2013 Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) was produced. MBC's position is that identified needs will be met through permanent consents, site allocations, turnover of the two public sites in the borough and an allowance for consents coming forward on unidentified sites.

Thank you again for consulting the borough council and we looking forward to on-going, productive discussions with yourselves as our plans progress.

Yours sincerely,



Mark Egerton
Planning Policy Manager