

Appendix 1: Proposed Representations to the Tonbridge & Malling Borough Local Plan Regulation 19 Consultation

Policy	Policy LP3 – Housing Provision
Support/Object	Support
Representation	MBC welcomes the confirmation in Policy LP3 that the Local Plan will provide for 6,834 new homes to address the full objectively assessed housing need (FOAN) up to 2031.
Modification requested	n/a

Policy	IDP & Policy LP25 – Housing Allocations Overview
Support/Object	Objection
Representation	<p>Improvements to M20 J5 are referenced as a pre-requisite for development at the East Malling Research Centre Area of Opportunity (Policy LP33) but it is not apparent whether this junction requires improvement to serve the development planned up to 2031. Improvements to this motorway junction are part of the Maidstone Integrated Transport Package.</p> <p>If improvements to M20 J5 are required to serve the development proposed in the plan, this should be added as a scheme to the IDP and included in the relevant site allocation policies for which development contributions will be sought, should the scheme not be fully delivered using MITP funding.</p> <p>MBC notes that the IDP includes an improvement scheme for A20/Mills Road/Hall Road and indicates that KCC is hoping to secure £2.2m of the £3.5m cost from the Local Growth Fund. Whilst MBC has no objection to the scheme in principle, it must underline that funding for the scheme should not be diverted from the agreed Maidstone Integrated Transport Package.</p> <p>Soundness: if the requisite infrastructure requirements are not identified there is a risk that the plan will not be deliverable and thereby fail to be EFFECTIVE</p>
Modification requested	If improvements to M20 J5 are required to serve the development proposed in the plan, this should be added as a scheme to the IDP and included in the relevant site allocation policies for which development contributions will be sought should the scheme not be fully delivered using MITP funding.

Policy	Policy LP28 – South Aylesford Strategic Site
Support/Object	Objection
Representation	To large effect the development of the South Aylesford strategic site will close the gap between the Medway gap urban area and Allington along A20 frontage. It will also reduce the gap in development on the eastern side of Hermitage Lane to

	<p>the single field's width between Barming station and the hospital.</p> <p>The allocation policy should include a requirement for the development to be underpinned by a robust landscape strategy which; i) achieves substantial landscape frontage to the A20 which sustains a sense of separation between the two urban areas; and ii) provides a landscaped frontage to Hermitage Lane and along the southern boundary of the site to moderate the overall visual impact of the development.</p> <p>Soundness: These changes are required to ensure the plan is CONSISTENT WITH NATIONAL POLICY, in particular the 2012 NPPF's direction that development should add to the overall quality of the area, establish a strong sense of place, respond to local character and be visually attractive (paragraph 58).</p>
Modification requested	<p>Addition of a criterion to Policy LP28 requiring the development to be underpinned by a robust landscape strategy which; i) achieves substantial landscape frontage to the A20 which sustains a sense of separation between the two urban areas; and ii) provides a landscaped frontage to Hermitage Lane and along the southern boundary of the site to moderate the overall visual impact of the development.</p>

Policy	IDP; Policy LP28 – South Aylesford Strategic Site; Policy LP25 – Housing Allocations Overview
Support/Object	Object
Representation	<p>The transport evidence shows the Tonbridge Road (A26)-Fountains Lane-Farleigh Lane junction to be significantly over-capacity at 2031. It is considered that T&MBC and KCC should undertake a more detailed study, as signalled in the Transport Assessment Addendum to test whether a revised scheme can be designed to improve the performance of this junction. If this demonstrates an alternative, more effective solution, this should be incorporated into the IDP and development contributions will be sought from sites specified in the local plan, including the South Aylesford Strategic Site. This is required to ensure there is a meaningful scheme which will mitigate the development on both sides of the boundary, including development in Maidstone borough for which s106 monies have already been secured, and to ensure a co-ordinated approach to improvements along Hermitage Lane.</p> <p>Soundness: if the required infrastructure to mitigate the impacts of development are not identified there is a risk that the plan will not be deliverable and thereby fail to be EFFECTIVE</p>
Modification requested	<p>An alternative, more effective improvement scheme for the junction be incorporated into the IDP and development contributions will be sought from sites specified in the local plan, including the South Aylesford Strategic Site</p>

Policy	Policy LP33 - East Malling Research Centre Area of Opportunity.
Support/Object	Object
Representation	Whilst not an allocation in this plan, the identification of this extensive area for

	<p>future consideration confers the clear expectation that it will be part of a future strategy. In these circumstances, the matters which will need to be explored and resolved using up to date evidence <u>before</u> a firm allocation can be made in a future plan need to be clearly set out in this plan as part of Policy LP33. This will provide certainty for all users of the plan that there will be a full examination of all relevant planning factors and what these factors will be and that future decisions will be evidence based. The matters which are of particular interest to MBC and which should be included in the policy for future testing are the traffic and air quality implications, including cumulative impacts.</p> <p>Soundness: These additions are required to ensure that the proposed AoO is JUSTIFIED</p>
Modification requested	<p>Policy LP33 should set out clearly the matters which will need to be assessed and resolved before the allocation of this site could be justified in a future review of the local plan. These matters should include, but not be limited to, transportation implications and air quality impacts.</p>

Policy	IDP; LP23 – Sustainable transport; Policy LP25 – Housing Allocations Overview
Support/Object	Object
Representation	<p>The plan and associated IDP should be more specific about the actual sustainable transport measures which will be delivered to give much greater certainty that the 10% degree of modal shift assumed in the Transport Assessment will be achieved in practice. Specificity is also needed in terms of both cost and means of delivery. It could include schemes on the Maidstone side of the border, e.g. from the Maidstone Cycling & Walking Strategy, which could help mitigate the increased flows into Maidstone generated by the new development. Identifying specific measures is also considered vital to address the air quality implications of the plan’s development, especially as the proposed developments will generate additional traffic on key routes into Maidstone (A20, A26 and Hermitage Lane) which fall within the Maidstone AQMA and to moderate the impacts on the nature conservation sites of international significance, including the North Downs Woodland Special Area of Conservation.</p> <p>The council’s own evidence advises on measures which could be incorporated such as additional cycling routes, more frequent and/or more direct bus services to connect with railways or commercial centres, low emission bus services and contributions to electric vehicle (EV) charging infrastructure. The evidence also recommends that TMBC require major development to maximise opportunities for incorporating EV charging points into new residential housing areas and explore options for the introduction of commercial ‘car clubs’ with low emission car sharing and bike hiring schemes.</p> <p>Soundness: if the required infrastructure to mitigate the impacts of development are not identified there is a risk that the plan will not be deliverable and thereby fail to be EFFECTIVE</p>
Modification requested	<p>That the IDP includes specific sustainable transport schemes. All schemes, including the proposed high frequency bus route and links to Barming Station which are already items in the IDP, should be costed and the site allocation</p>

	policies in the Local Plan should specify where developer contributions will be sought towards the specific schemes.
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Policy	LP20 - Air Quality
Support/Object	Object
Representation	<p>The Air Quality Assessment prepared for the plan does not appear to have assessed the implications of the plan's proposals for the Maidstone AQMA. The council requests that this is rectified prior to the plan's submission, including the incorporation of mitigation measures into the plan/IDP if required, so that this cross boundary issue can be resolved.</p> <p>Soundness: the additional work is required to ensure that the plan's approach to air quality mitigation is JUSTIFIED</p>
Modification requested	If further assessment establishes that the Maidstone AQMA will be adversely impacted by the plan's proposals, mitigation measures should be incorporated in the IDP and delivery secured through additional requirements in the site allocation policies.

Policy	Appendix C - Green Infrastructure & Ecological Network Diagram
Support/Object	Object
Representation	<p>The Green Infrastructure & Ecological Network Diagram shows 'principal green corridor extensions' as arrows extending into neighbouring boroughs. In Maidstone's case these are in the vicinity of Yalding/Laddingford, Teston/Barming, Forstal Road and Westfield Sole.</p> <p>The approach to habitat protection and creation is rightly a matter for MBC to consider as part of a holistic assessment through its own local plan review and the T&M plan should not be illustrating specific approaches on MBC's side of the boundary. This policy approach has not previously been raised or agreed through Duty to Co-operate discussions.</p> <p>Soundness: This aspect of the plan is not EFFECTIVE</p>
Modification requested	Remove the 'principal green corridor extensions' notation from the diagram.

Policy	Policy LP38 – Travellers & Travelling Showpeople
Support/Object	Object
Representation	<p>The plan states that there is a need for 16 additional pitches for Gypsies & Travellers over the remaining plan period but the plan does not allocate sites. Firm provision is the best way to ensure needs will be efficiently and effectively met. Planning for Traveller Sites directs that local plans should identify a supply of specific, deliverable sites and make allocations where there is identified need (paragraphs 10 & 11). Without confirmed allocations, there is some risk that</p>

	<p>identified needs will not be met during the plan period. Prior to submission, consideration could be given to including the required number of Gypsy pitches within the strategic site allocations.</p> <p>Soundness: in its current form, this aspect of the plan is not CONSISTENT WITH NATIONAL POLICY</p>
Modification requested	That the plan include specific sites to address the identified need for additional Gypsy and Traveller sites.