

Regulation 18 Local Plan consultation  
Tonbridge and Malling Borough Council  
Gibson Building, Gibson Drive  
West Malling  
Kent, ME19 4LZ

03 November 2022


*Sent via email*


Dear Sir/Madam

## Maidstone Borough Council

Maidstone House,  
King Street,  
Maidstone, Kent ME15 6JQ

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### **Re: Tonbridge and Malling Borough Council Local Plan Regulation 18 Consultation**

I refer to the above consultation and wish to make the following representations on behalf of Maidstone Borough Council (MBC).

As you will be aware, MBC is in the process of reviewing its adopted Local Plan (25 October 2017). The Maidstone Local Plan Review was submitted to the Secretary of State for independent examination on 31 March 2022. The examination hearings are currently in process. MBC has and will continue to work closely and constructively with Tonbridge and Malling Borough Council (TMBC) through the duty to cooperate on strategic matters pertinent to the authorities' respective local plans. We also look forward to working jointly with Kent County Council and National Highways given that there are clearly matters that fall within their remit and responsibility.

Whilst it is acknowledged that TMBC have a requirement to meet identified needs, including for housing and economic development, the new Local Plan could have a significant impact on Maidstone Borough residents and businesses as well as the environment. It is therefore imperative that the potential effects of the plan on Tonbridge and Malling Borough and neighbouring authority areas, including Maidstone, are robustly considered. MBC would welcome the opportunity to continue working with TMBC to help ensure that any potential adverse impacts resulting from the emerging Local Plan are identified at an early stage so that these can be avoided and/or appropriately mitigated.

The Regulation 18 document sets out several spatial options for distributing growth within Tonbridge and Malling Borough. It is noted that these options provide for areas that are proposed to be a 'focus of development'. Many of these include development in the northern and eastern parts of the borough in proximity to the Maidstone Borough boundary; for example, the areas the document identifies as Walderslade, Medway Gap, Kings Hill and East Peckham. Whilst at this stage in the plan process details as to the preferred spatial approach and quantum of development expected in different locations are yet to be confirmed, MBC raise concerns with the spatial options in terms of their impacts, particularly on the highway network and air quality (including in Air Quality Management Areas).

As significant new development in the aforementioned areas is likely to exacerbate existing local issues of traffic and congestion, mitigating transport impacts on routes into Maidstone will be vital. This includes the A20, Hermitage Lane and the A26. Consideration should also be given to encouraging and enabling modal shift to support sustainable transport and to help reduce reliance on car use.

Furthermore, the spatial options could result in the coalescence of settlements with those in Maidstone Borough. This matter should therefore be addressed in the assessment of spatial options along with any approaches required to support these, such as the review and potential release of Green Belt land and analysis of site allocation development capacities. The Local Plan should also include measures to address coalescence, for example, through provisions on retention and delivery of new open space, natural and semi-natural landscaping and air quality.

The Regulation 18 document states that Tonbridge and Malling Borough shares a strategic housing market area with Maidstone, across the northern and eastern parts of the Borough. This is corroborated by the Maidstone Strategic Housing Market Assessment (2021). MBC welcomes that the diverse housing needs of the population in the wider market area will be considered as work on the plan progresses. MBC strongly supports TMBC's intention to meet the Borough's identified local housing need in full through the Local Plan. It also supports the addition of a contingency in order to ensure delivery against this need. However, MBC wishes to stress that the level of this contingency must be carefully considered and managed so to ensure there will be no adverse impacts on Maidstone Borough, and that growth at this scale can be appropriately supported by infrastructure.

The Regulation 18 document explains the context for the Local Plan to address the housing needs of gypsies, travellers and travelling showpeople. It also sets out findings on the evidence of need for this group arising in Tonbridge and Malling Borough. MBC notes that it is preparing a Gypsy, Traveller and Travelling Showpeople Development Plan Document to address the significant need that exists within its borough. We will continue to engage with TMBC and other local authorities through the duty to cooperate to ensure housing needs for this group are appropriately addressed through the plan process, in accordance with national planning policy.

The Regulation 18 document provides that Tonbridge and Malling Borough forms part of the West Kent functional economic market area. This is generally agreed however it is noted that the latest evidence base for both TMBC and MBC indicate that parts of Tonbridge and Malling have a strong relationship with the Maidstone functional economic area. It is understood that the findings of the TMBC Economic Development Needs Study (2022) will be refined as work on the Local Plan progresses. MBC await further information and updates on identified needs for economic development in Tonbridge and Malling and the approaches to meeting these, as there may be implications for Maidstone given the respective boroughs' economic ties. This also applies to needs for retail and other main town centre uses. MBC will seek assurances that the Local Plan will not negatively affect centres in Maidstone, including through evidence of impact assessments where appropriate.

We look forward to providing comments when further details of the Local Plan proposals become known.

Sincerely

Mark Egerton  
Strategic Planning Manager  
Maidstone Borough Council