

Report to: Cabinet

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Subject: South East Plan: Consultation on Secretary of State's Proposed Changes

Summary

i The Government has published the changes that it proposes to make to the South East Plan (the Regional Spatial Strategy - RSS). Objections and comments can be made by KCC to the Government Office by 24th October. After considering objections and comments the Government will adopt the Plan as the statutory planning strategy for the South East. It will replace the Kent and Medway Structure Plan early in 2009, unless the Government agrees to "save" some of its policies.

ii The Government accepts many of the recommendations made by the Panel that conducted an Examination in Public into the Plan from November 2006 to March 2007. The Government proposes additional changes that do not arise from the Examination.

iii Among the many changes on which it is proposed KCC should comment, it is recommended that KCC objects strongly to the following :

1 The increase in housing provision

iv The number of new dwellings to be provided in the South East and Kent has increased at each stage of the Plan process :

	Draft Plan 2006	Panel Report 2007	Government Changes 2008	Total Increase
South East	578,000	640,000	662,500	+ 84,500 (+15%)
Kent & Medway	122,000	131,580	139,420	+ 17,420 (+ 14%)

v The Government now proposes an additional 7,840 dwellings on top of the increase recommended by the Panel after public Examination of the Plan. This will inevitably increase the proportion of dwellings on green land, and increase the pressure for out of character, high density development in residential areas.

vi National policy and the South East Plan set a target of 60% of new dwellings to be built on "previously developed land". In the KCC area in 2007-08, 78% of the new dwellings completed were on such sites (excluding Medway). However, this proportion could fall in the future because 65% of the planned sites (over 5 dwellings) in the KCC area are on "previously developed land". These sites in the KCC area

total 55,000, only 45% of the total 123,120 dwellings now proposed by Government for the KCC area.

vii This issue is of major concern to KCC which feels there is a strong likelihood that the policy of 40% of development on green sites could be substantially exceeded. Moreover, “previously developed land” includes urban spaces such as gardens, the loss of which can itself involve considerable loss of amenity.

viii The Government forecasts of demand, on which the policy for new housing is based, assume continuing inward migration, resulting in a projected increase in England of 7 million people by 2031, and movement into the South East. First indications are that the total new dwelling provision for Kent & Medway would go hand in hand with an increase of over 20% in households. The policy for new housing also assumes high market demand, but recent events have demonstrated the need for secure funding in the housing market, and the fragility of the recent high levels of completion.

ix KCC has accepted the aspirations of some District Councils for higher housing numbers, for example to enable Growth Point status at Dover. However, the cumulative impact of the additional housing now proposed raises serious planning questions in the following areas :

- | | | |
|--------------|--|---|
| • Dartford | + 1,640 dwellings in addition to the Panel Recommendations | |
| • Swale | + 1,500 | “ |
| • Canterbury | + 1,000 | “ |
| • Maidstone | + 1,000 | “ |
- *At Dartford* a major development programme is already accepted and will require further infrastructure investment. There are serious doubts that additional dwellings could be supported by the transport system, local services and the market, or could be accommodated on brown-field regeneration sites.
 - *In Swale*, major development is also accepted, concentrated at Sittingbourne. This will require some green field land and infrastructure constraints must be overcome. An additional 1,500 dwellings will increase green land take and have an untested impact on infrastructure and services.
 - *In Canterbury* the total development now proposed could require a major urban extension, but there are critical transport and heritage constraints, and a question mark about long term water supply.
 - *At Maidstone* the development and infrastructure needed to accommodate the agreed dwelling numbers for a *Growth Point* are being examined by the Borough Council and KCC. However, the further 1,000 dwellings proposed by Government will need to be built on new green land, and the capacity of transport, water supply and other services are uncertain.

The District Councils for these areas have similar concerns.

[see para. 60-75 of the full response for details of each District's housing provision and the proposed changes]

x The Government accepts the Panel's recommendation for a total of 6,000 dwellings in Tunbridge Wells Borough to 2026, but proposes that the Green Belt may need to be revised. This housing provision would only be acceptable on planning grounds if windfall sites coming forward over time can count towards meeting the

Government's target. It is recommended that KCC object strongly to the suggestion of Green Belt revision at Tunbridge Wells, and to the proposed 6,000 dwellings if windfall sites are excluded from land supply. [para. 78-80]

2 The lack of certainty for infrastructure provision

xi The Government proposes to delete clause (iii) of Policy CC7, as recommended by the Panel. This states :

“Development shall not proceed until the relevant planning authorities are satisfied that the necessary infrastructure required to serve the development is available or will be provided in time”.

This will materially weaken the ability of local councils to ensure that development does not place unacceptable burdens on infrastructure and services. The Government fails to recognise that infrastructure investment is required to meet current needs and deficits, not just future need associated with development. It has not assessed the implications of the additional dwellings proposed in the South East and Kent for those services. There needs to be a direct and transparent link between planned new development and the main funding programmes.

xii The Regional Assembly is tasked to undertake further work on infrastructure needs, and KCC will update its assessment of “What Price Growth”, which measured the scale of funding needed to support planned development. It demonstrates the need for resource very much greater than can be expected in contributions from developers. [paras. 31-33]

3 The treatment of housing quantities as “minima”

xiii The Government proposes to change Policy H1 to require local planning authorities to ensure the delivery of “minimum” annual average dwelling increases. This will create uncertainty for District Councils in preparing their forward plans, and in the planning and delivery of infrastructure. It will also assist developers to argue for additional land release. Ultimately the uncertainty created by ill defined dwelling numbers undermines the integrity of the South East Plan, and the balance between development and the environment that the strategy embodies. The changes to migration policy and the difficulties in the housing market argue against a “minima” approach to housing provision. [para. 55 and 83-84]

4 The deletion of the Strategic Gap concept

xiv The Government proposes to delete Policy CC10b which allows local planning authorities to designate “Strategic Gaps” where there is a need to prevent the coalescence of settlements. It also removes recognition of the Mid Kent and Medway-Sittingbourne Strategic Gaps, despite their being confirmed in the Kent and Medway Structure Plan and accepted by the Panel as ‘truly strategic’. The deletion of Policy CC10b will reduce the ability of local planning authorities to shape the form of development at urban areas, and to protect important gaps between them. [para. 37-40 and 151]

5 The lack of local landscape protection

xv Throughout the preparation of the South East Plan there has been no support for policies that allow the designation of areas subject to sub regional landscape protection. In Kent this threatens the future of the *Special Landscape Areas*

designated by the Kent & Medway Structure Plan, and supported by all local authorities in Kent. The Government does propose to change Policy C4 to state that planning authorities should “*aim to protect and enhance ...local distinctiveness of ...landscape*” and “*ensure that all development respects and enhances local landscape character*”. It would be logical to accept local designation of special landscape value, and it is proposed that KCC object to the absence of such a policy in the Plan, and the lack of recognition for existing designations that should be retained. [para. 133]

6 The search for “broad locations” for intermodal freight interchanges

xvi The Government accepts the Panel’s Recommendation that Policy T13 should be retained, with minor amendment. This requires that the Regional Assembly should work jointly to “*identify broad locations within the region for up to three intermodal interchange facilities..*”. The Government makes clear that the context for this is work undertaken by the former Strategic Rail Authority in which they identified a need for “*between three and four ... terminals to serve London and South East England*”. The SRA study included London and much of the East of England, and provides no basis for “*up to three facilities*” in the much smaller South East administrative region. Specifically there is no case for provision of such interchange facilities in Kent, where transfer of freight to rail should be enabled at the ports, and by through rail freight via the Channel Tunnel. [para. 101]

7 London waste exports

xvii Policy W3 requires waste authorities to provide capacity for a “*declining amount of waste from London*” which will “*usually be limited to landfill*”. KCC should support the reduced tonnage for Kent & Medway in the policy (from 3.3 million tonnes 2006-25 to 2.46 million tonnes) but there are concerns over the reliability of the quantities in the policy and how it is to be implemented, that suggest the quantities should be deleted. Objection should be raised to the increased share of London waste to be taken by all areas to compensate for the zero provision in Hampshire in the first period of the Plan. [para. 121-122]

8 The omission of the Dover – Thanet transport link

xviii Contrary to the recommendation of the Panel, the Government has not accepted the Dover-Thanet transport corridor as part of the regional network of “hubs and spokes” to which priority will attach. KCC should object to this omission as illogical and inconsistent, given the importance of Dover and Thanet, and the need to improve the coastal route. [para. 93-95]

9 Early review of the South East Plan to meet higher housing numbers

xix There is the prospect of an early review of the South East Plan, beginning in 2009, which among other matters would test the higher housing numbers implied by recent Government policy (the 2007 Housing Green Paper). Although not part of the Government’s proposed changes and the current consultation, it is proposed that KCC make early representations on the appropriate nature of review. It should be on an objective basis, open to downward revision of quantities in the light of changing circumstances such as market strength. Quantities should be phased over the life of the plan to recognise the responsiveness needed in the review process, rather than a rigid commitment to a 20 year target.

Other Proposed Changes

xx The full text of the proposed County Council response to the Government's changes follow, and this contains other points of objection.

The Government also proposes many changes to which no objection should be made, or which can be supported. For, example, the Cabinet should note the endorsement of *New Growth Point* status for both Maidstone and Dover, and the recognition of Dover as one of 22 regional hubs.

A schedule of detailed points on matters of fact, omission etc. will also be submitted.

The Recommendations to Cabinet seek authority to submit all these suggested representations.

THE FULL KCC RESPONSE TO THE CHANGES PROPOSED BY GOVERNMENT

Background

1. The draft South East Plan was submitted to Government in March 2006 and an Examination in Public (EIP) was held between November 2006 and March 2007. The EIP Panel report and recommendations were published in August 2007. The Government's response to the Panel's recommendations and its Proposed Changes to the draft South East Plan were published in July 2008. Consultation on these extends to 24th October 2008.

2. This report identifies the main thrust of the Government's changes and the proposed response by the County Council.

The South East Plan Proposed Changes

Chapter 1: Introduction and Overview

3. The text sets out the relationship between the RSS and County Structure Plans, and Appendix A lists structure plan policies which will be replaced by the adoption of the RSS.

Comment

4. *There is no reference in Appendix A to the Kent & Medway Structure Plan. This was the last structure plan to be adopted in the region (July 2006), and its provisions apply for 3 years, until July 2009, unless overtaken by the South East Plan. The final South East Plan will need to clarify which of the Structure Plan policies it will replace when it is adopted. Consideration now needs to be given to whether KCC should negotiate with the Assembly and Government to retain any Structure Plan policies beyond final approval of the South East Plan.*

Chapter 2: Challenges and Context

5. The changes implement the Panel's recommendations to provide a more succinct and strategic context for the Plan. The region's relationship with London is presented as the cornerstone of the 'story' of the South East – with reference to a '*multi centred region, gathered around and supporting a city that increasingly operates on a global scale*'. There follows a resume of the challenges and opportunities facing the South East :

- its relative affluence and economic strength
- the quality and extent of its natural assets
- current perceptions amongst residents of a high quality of life in the region
- wide social and economic disparities
- 'unprecedented' levels of population growth and migration pressures (projected population growth of 64,000 per annum over the next 20 years in comparison with growth of c.41,000 per annum since 1991)
- acknowledged pressure on social and physical infrastructure, and challenges to stabilising the region's ecological footprint.
- an ageing population
- globalisation, and the pace of technological change

- household growth outpacing population growth
- 'lagging' housing supply, and worsening affordability
- climate change, and the need to do more to contribute to the national target for reduced green house gas emissions

Chapter 3: Vision and Objectives

6. Changes are proposed to reflect the Panel's recommendations and the new Regional Sustainability Framework. Two objectives are added (the needs of an ageing population, and crime reduction). The transport objective is widened to include improvements in key transport links, and the housing objective is revised to refer to delivery of a 'sufficient' level of housing (the Draft Plan referred to planning for a 'reasonable' level).

Chapter 4 Spatial Strategy

Spatial Principles

7. This is a new chapter, responding to the Panel's recommendations and based on six spatial principles :

- a coordinated approach to managing change, using nine sub regions (including Kent Thames Gateway and East Kent & Ashford)
- focusing development on regional hubs
- pursuit of urban focus and urban renaissance
- spreading opportunities more evenly, through regeneration and social inclusion
- protection of the Green Belt
- support for the vitality and character of rural areas

8. A new policy (SP1) identifies the region's sub areas and their policy focus. For Kent Thames Gateway this is growth and regeneration, while for East Kent & Ashford it is the Growth Area of Ashford and regeneration for the rest of East Kent.

Regional Hubs

9. Policy towards regional hubs (SP2) gives more weight to the relationship between hubs as a focus for accessibility and economic activity and the location of housing development. **22 regional hubs** are now identified. **Dover** has been added on the grounds that it serves as a transport interchange and international Gateway and will be a focus for new housing (see Chapter 7 below). The other hubs in Kent are confirmed (***Ashford, Canterbury, Ebbsfleet, Maidstone, Tonbridge/Tunbridge Wells and Medway Towns***).

Comment

10. *Dover is an important interchange and gateway and its role within the regional strategy has evolved considerably during the evolution of the South East Plan, with a 60% increase in the District's housing allocation and confirmation of Dover (town) as a New Growth Point. Designation of Dover as a hub is both consistent with the emphasis the plan now places on the role of hubs as focal points for housing and*

economic activity. It is important to the implementation of transport investment essential to the delivery of the growth now planned.

11. Maidstone and Tonbridge - Tunbridge Wells lie outside the sub regions. Both are identified as accessible settlements of 'regional significance', and **Maidstone** has 'the potential to accommodate significantly higher levels of development than other urban settlements located outside the 9 sub areas'.

12. The relationship between hubs and other designations is complex :

- 5 hubs (including Ashford, Ebbsfleet and Medway) lie in the Sustainable Communities Plan Growth Areas;
- 7 hubs (including Maidstone and now Dover) are New Growth Points;
- 11 hubs (including Ebbsfleet and Medway Towns) lie within SEEDA's 'Diamonds for Investment and Growth'
- The hubs are also Centres for Significant Change for major new retail development (Ashford and Chatham in Kent), Primary Regional Centres (Canterbury, Maidstone, and Tonbridge-Tunbridge Wells) or Secondary Regional Centres (Dover).

Strategic Development Areas

13. **8 Strategic Development Areas (SDAs)** are identified for developments of 4,000 to 5,000 dwellings. They include 5 of the 6 recommended by the Panel (but with Reading excluded), plus 3 additional areas at Milton Keynes East, Whitehill/Borden (Hants) and Shoreham (West Sussex). The latter two are prospective locations for the Government's eco towns programme. None are identified for Kent.

14. The Government proposes to include a statement that it would be *'inappropriate to limit the natural growth to the west of the region as it would inhibit wealth creation and lead to more pressure on existing housing stock and longer journeys to work.'*

15. A review of the plan will be required to identify further opportunities for Strategic Development Areas (SDAs) in the 'Golden Arc'¹ to support continued wealth generation in the South East.

Comment

16. *Both the EIP Panel and Government are clear that greater restraint on economic growth and housing supply in the more economically buoyant parts of the region does not play a part in fostering regeneration and change in the less prosperous sub areas such as East Kent and Kent Thames Gateway. Rather the emphasis should be on measures to boost their competitiveness through infrastructure and skills development as well as land provision.*

17. *A particular concern of the County Council with the Draft Plan was the differing approaches across the region to the balance between economic potential, labour supply and housing provision. The Panel's recommendations and the*

¹ Defined as extending from Bournemouth/Poole and South Hants in the south through Reading, Oxford and on to Milton Keynes and Cambridge

Proposed Changes have addressed this, with increased housing provision concentrated in parts of the western sector of the region (Berks, Oxon, Surrey and West Sussex)[see Appendix 1].

18. *There is considerable concern that the robustness and coherence of the spatial strategy will be undermined by the 'loose' nature of other policy provisions of the Plan – particularly the treatment of the housing quantities as minima (see comments below under Chapter 7).*

19. *The spatial strategy of the Plan continues to encompass a phalanx of policy designations² which make the Plan difficult to understand and use. A priority for a future review of the Plan should be to simplify the spatial strategy in the interests of those who have to work with the plan professionally and the layman.*

Urban Focus

20. The policy supporting urban areas as the prime focus for development (SP3) has undergone some minor revision e.g. to recognise that some development will take place on the edge of settlements. The policy maintains the target of achieving 60% of 'all new development' on previously developed land and through conversions of existing buildings.

Comment

21. *A number of issues continue to surround the 60% target. The evidence base and derivation of the target in the context of the South East remains unclear. There is a national target of 60% for the use of previously developed but this refers specifically to housing, while the South East Plan target embraces all new development. Moreover, there are quantities in the in the South East Plan only for housing, and these are to be treated as minima. The impact of the increased housing provision as a result of the Panel and Government changes is not taken into account. Nor is the effect considered of national guidance (PPS3), which has been operative since late 2006, and precludes local authorities from taking full account of 'windfall' development in their forward planning for housing supply. The increased housing provision and PPS3 will result in higher proportions of green land taken for development.*

Green Belt

22. Policy SP5 (Green Belts) confirms the 'broad extent' of the Green Belt in the region as appropriate, but requires 'selective' reviews at Guildford, Oxford and possibly Woking. The door is also left open to small scale reviews through Local Development Frameworks (LDF), and elsewhere in the Plan this is indicated as likely to include Tunbridge Wells.

Comment

23. *The prospect of some review of inner Green Belt boundaries at Tunbridge Wells has been increased by the additional housing provision (+ 1,000 dwellings) applied to the Borough, the role of the town as a regional hub where housing and economic activity should be focussed, and the impact of national policy constraining*

² Including regional hubs, growth areas, growth points, Strategic Development Areas, diamonds for Investment and Growth, sub regions for growth and/or regeneration, Centres of Significant Change, Primary and Secondary Regional Centres

the allowance that can be made for ‘windfall’ development in accommodating housing targets. Such developments have accounted a substantial proportion of housing completions in Tunbridge Wells in recent years. KCC makes strong objection to the possibility to Green Belt revision at Tunbridge Wells at paras. 78-80.

Chapter 5: Cross Cutting Policies

Sustainable Development

24. *Policy CC1 (Sustainable Development) has been overhauled to reflect the new Regional Sustainability Framework and its four priorities for action:*

- *Achieving sustainable levels of resource use;*
- *Reducing greenhouse gas emissions associated with the region;*
- *Ensuring the region is prepared for the impacts of climate change;*
- *Ensuring that the most deprived people have an equal opportunity to benefit from, and contribute to a better quality of life.*

Comment

25. *The substantial changes to this policy are supported in bringing the Plan alongside the Regional Sustainability Framework which post dates the Draft Plan.*

Sustainable Construction

26. *On Policy CC4 (Sustainable Design and Construction) Government has not accepted the Panel’s endorsement of the accelerated introduction of more demanding standards on building sustainability (i.e. exceeding building regulation standards). This reflects national policy introduced in 2007 that any such expectations should apply to identified development areas or site specific opportunities and be supported by a clear local justification.*

Comment

27. *National policy has moved on since the draft Plan with a national commitment to reach zero carbon standards by 2016 for domestic properties and 2019 for the commercial sector. However in certain respects there are regional imperatives for rapid progress on sustainable construction e.g. in relation to water efficiency with all of the South East classed as an area of ‘serious water stress’ by the Environment Agency. Policy amendments elsewhere (NRM1 – Sustainable Water Resources) do enable identification of opportunities for higher water efficiency standards in LDFs.*

Infrastructure and Development

28. *The Government proposes to delete clause (iii) of Policy CC7, as recommended by the Panel. This states :*

“Development shall not proceed until the relevant planning authorities are satisfied that the necessary infrastructure required to serve the development is available or will be provided in time”.

Policy now refers to the scale and pace of development depending on sufficient capacity in existing infrastructure, release of additional capacity through demand management or better management or provision of new infrastructure. Where

additional infrastructure is required a programme of delivery should be agreed before development begins. Previous reference in the policy that development shall not proceed until the local planning authority is satisfied that the necessary infrastructure is or will be available in time is deleted.

29. The revised policy strengthens the requirement that local authority plans will identify the necessary additional infrastructure and services required. Provision for the phasing of development closely related to the provision of infrastructure has been added. The principles of a more proactive approach to infrastructure provision are set out. Improved delivery arrangements for infrastructure and a 'creative assembly' of public and private resources are particularly needed in the Growth Areas (Thames Gateway and Ashford) and the Growth Points (Maidstone, Dover).

30. The supporting text now includes a definition of 'infrastructure' which is drawn from the draft Implementation Plan for the South East Plan.

Comment

31. *The policy now refers to sufficient capacity in existing infrastructure only in relation to new development, although the EIP Panel suggested the reference to current needs should be retained. Policy should recognise that infrastructure investment is required to meet current needs and deficits and not just future need associated with development.*

32. *KCC objects strongly to the deletion of the "conditional approach" to infrastructure investment. This will materially weaken the ability of local councils to ensure that development does not place unacceptable burdens on infrastructure and services. Its significance is underlined by the EIP Panel's recognition of the "discontinuity between national fiscal policy and the regional strategy and the need to influence mainstream programme funding". There is no recognition or assessment of the implications for infrastructure delivery of the 14% increase in housing provision proposed by the Government compared to the Draft South East Plan.*

33. *The proposed new policy goes some way to ensuring the timely delivery of infrastructure, and the reference to agreeing an infrastructure delivery programme before development begins is helpful. However, this should relate to the granting of planning permission rather than the commencement of development, and specifically address the basis of funding for the infrastructure required. Expressed in this way the policy would have a similar thrust to Policy QL12 (Provision for New Community Services and Infrastructure) of the adopted Kent & Medway Structure Plan. Inclusion of a definition of infrastructure is supported, but could be improved by:*

- *including reference to infrastructure to support cycling and walking under transport;*
- *clarifying the position of adult education under the Education heading;*
- *elaborating on the definition of social and community facilities under Social Infrastructure including the extent of any overlap with the elements of Green Infrastructure addressed in Box CC3*

Green Infrastructure

34. Policy CC8 (Green Infrastructure) is a new policy responding to a Panel recommendation. Its designation and management is especially important at regional hubs and in areas close to sites of international ecological importance.

Comment

35. *The addition of this region wide policy is supported although reference to areas where it will be particularly important should include the growth areas and other locations involving substantial urban extensions other than the Strategic Development Areas that are already referred to.*

Strategic Gaps

36. Government proposes that the draft Plan Policy CC10b on **strategic gaps** be **deleted** despite a Panel recommendation for its retention albeit in an amended form. The Government invokes national policy guidance (PPS7) in support of this and argues that:

- a) at a regional level it is open to regional bodies to review green belt and with this in mind no justification is seen for a second tier of designation to address local circumstances;
- b) locally Government wants a more proactive approach setting out where development will be promoted rather than listing where it will be prevented.

Comment

37. *The County Council objects very strongly to the deletion of this policy. Used selectively on a strategic basis they are an important and distinctive tool for the shaping of settlement form, the management of urban growth and the prevention of settlement coalescence. The rationale of strategic gap policy does not stem from the intrinsic quality of the landscape and countryside that are better addressed through other policies. Although mirroring the anti coalescence objectives of Green Belt policy Strategic Gaps provide more flexibility as they can relate to, and can be reviewed as part of, the development plan cycle and guide the location, but not dictate the scale, of development provisions appropriate to an area. Green Belts on the other hand are seen as permanent for the foreseeable future. Although Government refers to the option of Green Belt policy to meet the objectives of Strategic Gaps this dismisses their sub regional role. In any event the current South East Plan has not reviewed the extent of Green Belt coverage in the region, nor was this part of the remit for the development of sub regional strategies.*

38. *The Proposed Changes are misguided in invoking PPS7 as basis for rejecting the Strategic Gap concept – there is no national guidance that specifically relates to Strategic Gaps – as indicated above such policies, correctly applied are neither local nor rooted in landscape protection.*

39. *Within Kent two strategic gaps (in Mid Kent and between the Medway Towns and Sittingbourne) are currently designated through the Kent and Medway Structure Plan (2006) and as such have been recently tested and confirmed through an EIP process that post dated PPS7. The EIP Panel's conclusions were that the identification of the Strategic Gaps of this Plan is predicated on a strategic approach to the avoidance of coalescence irrespective of landscape quality³ and the South East Plan EIP Panel concluded that the Strategic Gaps in Kent are 'genuinely strategic' in nature.⁴*

³ Paragraph 7.18, Kent and Medway Structure Plan: EIP Panel Report (February 2005) [SP4 PR]

⁴ South East Plan EIP Panel Report para 26.71

40. *The South East Plan EIP Panel supported the principles behind the Plan's strategic gap policy to ensure that the gaps identified are soundly based, strategic in nature and clear as to their purpose. The County Council considers that the policy should be reinstated, with appropriate provision in the relevant sub regional policies for the detailed definition and justification of Strategic Gaps that meet the criteria recommended by the Panel. KCC objects strongly to the deletion of Policy CC10b, which will reduce the ability of local planning authorities to shape the form of development at urban areas, and to protect important gaps between them.*

Chapter 6: Sustainable Economic Development

Regional competitiveness

41. This introduces a new policy (*RE1 - Contributing to the UK's Long Term Competitiveness*) which requires Local Development Frameworks to provide an 'enabling context' to ensure that the regional economy contributes fully to the competitiveness of the UK, and the regional planning body and RDA to ensure that the 'spatial requirements for market flexibility are fully met in all parts of the region'

Comment

42. *It is not evident what this additional 'headline' policy adds to national policy guidance (draft PPS4). Moreover there are no actions, indicators or targets associated with the policy that provide for its effective implementation and monitoring, or to guide LDFs in being 'sufficiently flexible to respond positively to changes in the global economy.'*

The Economy and Employment: Spatial Guidance

43. At the Examination in Public KCC was critical of the lack of clarity in the Plan in demonstrating how its objective to "address *intra-regional economic and social disparities*" was to be achieved, noting that the it did not provide strategic direction for the provision of new employment, and that employment land and total job targets should be provided by the Plan to identify where strategic change is planned. Policies and measures must alter market perception in favour of investment in Growth Areas and regeneration locations.

44. These views were endorsed by the EIP Panel - the lack of quantification of employment land requirements was judged 'regrettable' providing insufficient guidance for local planning in implementing the locational and land use elements of the Regional Economic Strategy and the South East Plan, and weakening the ability to protect sites for employment generating uses. Lack of guidance on employment space requirements was a serious deficiency and should be subject of an early Review of the RSS. The Panel also considered the Plan to be deficient in not providing any strategic context on the type of employment opportunities to be sought in different parts of the region, with a 'vacuum' in guidance on regionally significant development⁵.

Nationally and regionally important sectors and clusters

⁵ EIP Panel Report (2007) paras 6.73, 6.78 and 6.80-6.81

45. The Changes lend support (Policy RE2) to a sectorally based pursuit of economic growth as set out in the Regional Economic Strategy (RES)⁶. The Plan brings together a set of 'interim' job targets for the sub areas (East Kent and Ashford - 50,000 jobs 2006 - 2026; Kent Thames Gateway - 58,000 jobs 2006-2026; Rest of Kent - 15,000 jobs 2006-2016). They are provisional, and are to be addressed in an early review of employment land and floorspace matters in the Plan.

Comment

46. *At the EIP the County Council was critical of the lack of spatial guidance on the scale of employment land provision, and the recognition of this in the Panel Report and the Proposed Changes through advocacy of an early review of the Plan, is welcomed. The interim job targets for the Kent sub regions are drawn from the sub regional strategies. They are a realistic view of performance and policy aims, and have value as a yardstick for monitoring. They need to be updated in the light of more recent data and the revised dwelling provisions in the Plan. Their role in the conduct of employment land reviews and District level LDF preparation for employment land release should now be limited. The interim job targets should be revised consistently across the region to provide policy targets and not simply to reflect past performance.*

Human Resource Development

47. Policy RE4 (Human Resource Development) refers to a particularly significant increase in demand for education and training in Growth Areas, Growth Points and at SDA's. It also sets out the role of planning agreements to secure funding for training measures.

Comment

48. *The changes to this policy are welcomed, including the additional clause outlining the need for upskilling in sub regions where productivity is below the regional average.*

Smart Growth

49. The Regional Economic Strategy identifies 'Smart Growth' as a key challenge for the region and aims to achieve it by lifting under performance through:

- increasing the region's stock of businesses
- maximising the number of people ready for employment at all skill levels
- increasing business participation in tendering for public sector contracts
- improving travel choice, promoting public transport and facilitating modal shifts to address congestion
- ensuring sufficient affordable housing and employment space of the right type and size
- efficient use of land resources
- improving workforce productivity and increasing economic activity

50. The proposed policy on 'Smart Growth' (RE5 - to increase the region's prosperity whilst reducing the rate of increase in its ecological footprint) is applied region-wide, having previously been confined to the Western Corridor.

⁶ The RES identifies 6 key sectors with the greatest capacity to deliver growth- Digital Media , Marine Technologies, Health Technologies , Environmental Technologies and Services , Built Environment , Aerospace and Defence

Comment

51. *The general application of the principles of smart growth in the region through RE5 is supported, although the references to the components of smart growth in the policy on addressing intra regional economic disparities (RE6) appears to maintain a selective approach that differentiates between the economically buoyant and less buoyant areas.*

Chapter 7: Housing

Provision at the regional level

52. On housing (Policy H1) Government propose:

- Raising the region's housing provision to **33,125** homes per annum. This is **1,125** pa higher than the Panel's recommendation for 32,000 pa, and 4,225 pa higher than the original Draft Plan proposal of 28,900 pa.
- Raising total housing provision 2006-2026 from 578,000 in the Draft Plan and 640,000 in the Panel Report, to **662,500**. This is an overall increase of 84,500, or 15%, on the Draft Plan, and about 4% above the Panel figure.
- Overall, the annual provision for Kent and Medway has risen to almost **7,000 per annum (6,971 pa)**, with total provision over the 20 year plan period rising from 122,000 in the Draft Plan, and 131,580 in the Panel Report **to 139,420, an overall increase of 17,420 or 14%**. This is similar to the % increase for the region as a whole, but considerably less than in other parts of the region (see Appendix 1).

53. The Secretary of State wants RSS housing figures to be treated as **minima**, with Local Development Frameworks testing higher figures. The Government maintains that this approach takes account of :

- the EIP Panel's view that a rate of 32,000 per annum represents the bottom of the prospective range for housing provision
- need associated with economic growth of 35,000 pa as advocated by SEEDA
- evidence available to the EIP on demographic and household growth indicating 36,000 pa, to which an allowance should be added for meeting the backlog of housing need (rising to 37,450 pa)
- more recent Government projections indicating further upward pressure on requirements
- the level of short term housing supply indicated by monitoring - 38,000 pa
- advice emerging from the National Housing and Planning Advisory Unit (NHPAU) on the range of housing supply required to address demographic growth and affordability (37,800 to 49,700 pa)
- Government's *Housing Green Paper* objective to increase the rate of housing delivery nationally to 240,000 homes per annum by 2016

54. The Government indicates that notwithstanding the changes now proposed to the South East Plan, it will need to be reviewed, to plan for additional, longer term housing growth that contributes to national targets in the Housing Green Paper.

Comment

55. *The County Council objects strongly to the treatment of the housing quantities in Policy H1 as minima. While local planning decisions should seek to secure the quantities indicated, testing of higher figures introduces substantial uncertainty for local communities, and for planning and providing infrastructure. It potentially undermines the high level strategic framework that the South East Plan provides. This will be compounded by the deletion of phasing from the sub regional strategies, no defined limit to the higher values to be tested, and the impact of national planning guidance (PPS3) which excludes windfall sites from future housing supply.*

56. *It would help local interpretation of the housing figures if the Plan made clear that Policy H1 is a fresh view of housing provision from 2006, irrespective of past performance against numbers in the previous plan.*

Changes to Housing Provision: Kent and Medway

57. Policy H1 includes a revised housing distribution by District with some significant increases for a number of Districts in Kent. The EIP Panel's recommendations included some increases that had been accepted by KCC (e.g. at Dover, Thanet, Swale and Maidstone), but also added significant provision at Canterbury and Tunbridge Wells, and an increase at Swale.

58. Following the EIP the County Council endorsed higher housing provision at Dover (to a new total of 10,100) to support Dover DC's New Growth Point bid. This has been accepted by the Government and is reflected in their Proposed Changes.

59. In addition to full acceptance of the Panel's recommendations the Government's changes include additional increases at :

- Canterbury (+1,000)
- Shepway (+ 700)
- Dartford (+1,640)
- Swale (+1,500)
- Maidstone (+1,000)

60. The cumulative effect of changes to the Draft Plan is summarised below. Ashford and Gravesham (and Medway) are the only areas with provisions that are unaltered from the Draft Plan.

District	Draft Plan (April 2006)	EIP Panel Report (Aug 07)	Government Proposed Changes (July 08)	Change between Draft Plan and Proposed Changes	% change between Draft Plan and Proposed Changes
Ashford	22,700	22,700	22,700	0	0
Canterbury	7,200	9,200	10,200	3,000	41.7
Dover	6,100	8,100	10,100	4,100*	65.6
Shepway	5,100	5,100	5,800	700	13.7
Thanet	6,500	7,500	7,500	1,000*	15.4
Dartford	15,700	15,700	17,340	1,640	10.4
Gravesham	9,300	9,300	9,300	0	0
Medway	16,300	16,300	16,300	0	0

Swale	8,300	9,300	10,800	2,500+	30.1
Maidstone	8,200	10,080	11,080	2,880#	35.1
Sevenoaks	3,100	3,300	3,300	200	6.5
Tonbridge & Malling	8,500	9,000	9,000	500	5.9
Tunbridge Wells	5,000	6,000	6,000	1,000	20.0
Kent Thames Gateway	48,000	49,000	52,140	4,140	8.6
East Kent & Ashford	48,000	53,000	56,700	8,700	18.1
Rest of Kent	24,000	27,880	28,880	4,880	20.3
London Fringe (Kent part)	2,000	1,700	1,700	-300	-15.0
Kent and Medway	122,000	131,580	139,420	17,420	14.3

* *Change previously agreed by KCC*

+ *600 dwellings of this increase previously agreed by KCC*

1880 dwellings of this increase previously agreed by KCC

61. The Secretary of State justifies the increases above the recommendations of the Panel as follows:

Canterbury	<ul style="list-style-type: none"> • Panel's figure would be just below existing Structure Plan requirement. Not considered a sufficient response given the rate is only half of the district's own identified housing supply for 2006-6, and below the average completion rate since 2001 • Level does not respond to the potential requirements indicated by its buoyant economy and demographic need • Fails to reflect the transport capacity and capacity for housing/economic growth resulting from reduced travel times with CTRL Domestics
Dover	<ul style="list-style-type: none"> • Increase reflects strengths of the area as a gateway and key centre within the sub region. • No 'reasonable' evidence presented to back up Panel conclusion that a further increase at Dover could unbalance the sub regional strategy with its major focus on Ashford. • Official household projections project growth of 550 households per annum for next 20 years, indicative of a high level of demand. • Facilitating the retention and attraction of working age population is a key challenge for Dover. • Land commitments exceed Structure Plan requirements
Shepway	<ul style="list-style-type: none"> • Housing provision in the Draft Plan has been reduced compared to the annual average in the Structure Plan. • Past completions have been higher than the Draft SE Plan and the Structure Plan. • Identified housing supply is also higher, and projected household growth is strong
Dartford	<ul style="list-style-type: none"> • Panel 's figure is below level existing Structure Plan and insufficient because:

	<ul style="list-style-type: none"> • current housing supply indicates projected completions significantly in excess of draft RSS levels • economic growth potential and demand for economically active people is high in the area • downward trajectory is at odds with Government's stated aims for Growth Areas
Swale	<ul style="list-style-type: none"> • Levels of growth, particularly post 2016, are in conflict with the stated objectives of Government Growth Area policy. • Provision for post 2016 is just 45% of that for the first half of the period, and less than half the rate achieved in last ten years • Points also to a gap between household growth projection and provision, and evidence of capacity to develop without infringing environmental constraints • Government rejects Panel view that the need to give priority to economic regeneration is sufficient reason for not responding to the downward rate of housing provision implied by the RSS.
Maidstone	<ul style="list-style-type: none"> • As a regional hub and growth point, Maidstone has both a need and capacity to accommodate a higher level of housing. • Increase over and above Panel recommendation is supported by high level of completions in recent years, and Council's assessment of housing supply.

Comment

Canterbury

62. Housing provision at Canterbury has been increased by more than 40% in comparison with the Draft Plan. In principle much of the total provision and the bulk of the increase would be concentrated at the City itself consistent with its hub status and its economic strength which both the EIP Panel and the Secretary of State invoke as part of the justification for the further growth proposed. While reference is made to economic and household growth as imperatives for additional housing, there is no reference to the environmental and transport consequences of adding 3,000 dwellings (more than 40%) to the provisions of the Draft Plan. Although housing land supply is substantial it is wholly short term in nature, and it is inappropriate to base a strategy extending over 20 years and increases in housing provision beyond the Panel's recommendations, on this consideration.

63. The County Council notes that the Sustainability Appraisal (SA) accompanying the Proposed Changes has identified a number of Districts where a significant increases in housing numbers is proposed, and for which water resources are uncertain. These include Canterbury. The SA recommended that pending further assessment by the Environment Agency housing allocations in these Districts should be reconsidered. Government's response in finalising the Proposed Changes has been to amend the policy on water resources to direct development within Districts to areas where adequate water supply can be guaranteed, and/or to phase development so that 'sustainable new capacity' can be provided ahead of new development. It is not clear what actions follow if constraints apply on a District wide basis, or if there are conflicts between a pattern of development for which there is

capacity in water supply terms but which runs counter to the wider intent of spatial strategy e.g. an urban focus to development and concentration at hub settlements. It is noted that the Sustainability Appraisal report notes that no modelling work on the revised housing numbers and their distribution has yet been undertaken by the Environment Agency.

64. The Panel's recommended increases are substantial in themselves, and take account of the hub role of Canterbury and its economic strength. Given this context and the concerns raised by the Sustainability Appraisal, the County Council objects strongly to the additional 1,000 dwellings included in the Proposed Changes.

Dover

65. The changes in respect of Dover reflect the New Growth Point status now accorded to the town and which the County Council has endorsed subsequent to the EIP. In this regard the changes are accepted. A principal concern of the Council throughout has been the risk associated with an approach to regeneration that is unduly housing led. It is essential that the scale of development now envisaged will be delivered in a well planned manner, with housing and employment proceeding in parallel, and necessary infrastructure provided in support. In particular the County Council is concerned that any necessary urban extensions at Dover required to deliver the levels of housing associated with the Growth Point should provide a high quality community with improved access to transport and employment, properly integrated with the town of Dover as a whole, and without adverse impact on the strategic and local highway network. Given the central importance of infrastructure to delivery of growth point housing levels, phasing of housing supply will have a role to play. The phasing provisions included within the sub regional strategy for East Kent have been deleted by the Secretary of State, and this is a matter for objection, not least because of the lead times involved in translating growth into site specific proposals through the LDF, and in securing major new infrastructure.

Shepway

66. The Proposed Change (+700 dwellings) maintains the rate of housing provision in the current Structure Plan over the longer timescale of the South East Plan, and represents a significant curtailment of recent completion rates. Household growth pressures associated with net in migration remain strong, and the introduction of CTRL Domestic Services, which at Dover and Canterbury justify increased housings, will also benefit Folkestone. Notwithstanding the strategically important environmental constraints to growth at Folkestone and on Romney Marsh, full and effective use of land already committed to housing and regeneration initiatives have a role in maintaining rates of provision over the medium and longer terms. No objection is made to the Proposed Change.

Dartford

67. Although the housing numbers for Dartford in the Draft Plan were endorsed by the EIP Panel, the Proposed Changes have increased them by more than 10%, largely on the basis of consistency with the existing Structure Plan and Government's approach to the Growth Areas. While the substantial capacity for housing at Dartford is not disputed, the County Council's concern remains that policy should reflect a realistic view of the delivery, given the capacity is concentrated in a few very large sites, the length of time involved for their full implementation, and questions of infrastructure provision and services.

68. The EIP Panel agreed with KCC that strategy should not be solely based on capacity, and that 'phasing and deliverability are key considerations'⁷. Undue increases in housing provision and the need to demonstrate deliverability of land supply (as required by national policy guidance PPS3), would potentially detract from the focus of the strategy on reuse and redevelopment of previously developed or otherwise damaged land, and generate pressure to release additional greenfield land covered by important policy constraints such as Green Belt to meet requirements. At the EIP the EA supported the KCC and District view that increased dwelling numbers should not be adopted in view of the uncertain implications for land subject to flood risk. The Draft Plan provisions provided for a substantial acceleration in the annual rate average housing delivery in Dartford and Kent Thameside in comparison with recent development rates (almost 60% higher for Dartford, and almost 70% higher for Kent Thameside,) with the higher rate to be sustained over the entire South East Plan period. In this context, and given the Panel's consideration of the matter, the County Council considers there is no case to increase provisions at Dartford beyond those in the Draft Plan, and strong objection is raised to the Proposed Changes in this regard.

Swale

69. Housing provision for Swale has risen by 30% since the Draft Plan, with Government adding 1,500 dwellings (16%) to the EIP Panel's recommended level. The increase is in the Kent Thames Gateway part of the Borough.

70. The concern of the County Council at the EIP, and indeed of the Panel itself⁸, was that provision of significant greenfield development opportunities in Swale could detract from the emphasis on regeneration of brownfield land in the strategy for Kent Thames Gateway as a whole, and the realisation of more challenging sites in Kent Thameside and Medway where completion rates have fallen short of policy. The Panel were also concerned that Swale's priority need is economic regeneration, and that the growth rates of jobs and housing should be closely monitored.

71. When set alongside the Structure Plan the draft South East Plan provisions implied a steep decline in housing delivery beyond 2016. In the interim closer examination of the important sites in Queenborough /Rushenden and Sittingbourne has increased the potential capacity, and timescales for the delivery of development.

72. There remains a very substantial gap between prospective land supply and the EIP Panel's recommended provision of 9,300 dwellings, let alone the much higher figure in the Proposed all concluded that although higher housing levels would be reliant upon greenfield land, there are options for development around Sittingbourne that could be developed without infringing environmental constraints⁹. However these options are now already partly committed, or will be needed to contribute to meeting the Panel's recommended provision. The environmental and infrastructure impacts of the higher figure in the Proposed Changes have not been sufficiently tested, and will not assist the accelerated delivery of housing from brownfield land across the wider Kent Thames Gateway area, which is a cornerstone of Thames Gateway strategy. The County Council accepts the housing provision recommended by the Panel, but objects strongly to the arbitrary and untested further increase in the Proposed Changes. Housing provision for Swale should be 9,300

⁷ EIP Panel Report paras 19.62 and 19.67 page 279

⁸ EIP Panel Report para 19.73

⁹ EIP Panel Report para 19.73

2006-2026, of which 8,600 should be within the Kent Thames Gateway part of the Borough.

Maidstone

73. *The Proposed Changes add a further 1,000 dwellings to the level of growth (10,080 dwellings 2006-2026) endorsed by the Panel and supported by the Borough and County Council in the context of Maidstone's role as a New Growth Point (NGP). Delivery of 10,080 dwellings is heavily reliant on a substantial urban extension to the east of Maidstone for 4-5,000 homes. This is currently being explored through preparation of the Maidstone Local Development Framework, supported by transportation studies. The arguments invoked by the Secretary of State for the additional increase rely on Maidstone's need and capacity as a hub and growth point, suggesting that the further housing would need to be primarily accommodated at the town in addition to the concentrated growth already envisaged. Although the New Growth Point designation is initially focussed on the pre 2016 period, delivery of the urban extension will extend across the whole South East Plan period. This raises concern as to the deliverability of an additional 1,000 dwellings in a manner consistent with the urban focus of the strategy. The EIP Panel concluded that the Rest of Kent area, including Maidstone, should not be expected to accommodate significantly more housing(than they proposed, because of the risk of diverting interest and investment from the Growth Areas of Thames Gateway and Ashford¹⁰. Given current land supply, there will be a substantial call on greenfield land to meet NGP requirements at Maidstone.*

74. *The County Council notes that the Sustainability Appraisal (SA) accompanying the South East Plan Proposed Changes has identified a number of Districts where a significant increases in housing numbers is proposed and for which water resources are uncertain . These include Maidstone. The SA for the draft stage of the Proposed Changes recommended that, pending further assessment by the Environment Agency, housing allocations in these Districts should be reconsidered. Government's response in finalising the Proposed Changes has been to amend the policy on water resources to direct development within Districts to areas where adequate water supply can be guaranteed and/or to phase development so that 'sustainable new capacity' can be provided ahead of new development. It is not clear what actions will follow if constraints apply on a District-wide basis, or if there are conflicts between a pattern of development for which there is capacity in water supply terms, but which runs counter to the wider intent of spatial strategy e.g. an urban focus to development and concentration at hub settlements. It is noted that the Sustainability Appraisal notes that no modelling of the revised housing numbers and their distribution has yet been undertaken by the Environment Agency.*

75. *The Panel's recommended increases are substantial in themselves and take account of the hub and growth point roles of Maidstone and its economic strength. The County Council does not consider that the additional pressures implied by the Proposed Changes are either necessary or warranted, and risk the delivery of planned and balanced, urban-focussed growth at Maidstone. Adherence to a housing provision of 10,080 dwellings 2006-2026 is strongly advocated. Given this context and the concerns raised by the Sustainability Appraisal, the County Council objects strongly to the additional 1,000 dwelling increase included in the Proposed Changes for Maidstone.*

¹⁰ EIP Panel Report para 26.61

Sevenoaks

76. *The EIP Panel and the Proposed Changes have added 200 dwellings (6.5%) to the Draft Plan provisions for Sevenoaks. Of the total proposed (3,300 dwellings) currently identified sites constitute only c.1400 dwellings. Windfall development has been a major contributor historically, and national policy towards this will have significant implications for sources of future land supply for a District that is wholly embedded within the Green Belt. The County Council seeks acknowledgement in the Plan that the wide presence of Green Belt designation in the District and historical evidence of the windfall contribution represent distinctive local circumstances that should be taken into account in assessing the windfall and arriving at a local housing supply that minimises the call on Green Belt land.*

Tonbridge and Malling

77. *The EIP Panel and the Proposed Changes have added 500 dwellings (6%) to the draft plan provisions for Tonbridge and Malling. The Panel concluded that the additional housing would be primarily related to Tonbridge (as part of the Tonbridge/Tunbridge Wells regional hub) and be for the latter part of the plan period, given the 'front loading' of existing land supply. However neither of these considerations finds expression in the policy or supporting text of the Proposed Changes. No objection is made to the change in housing provision for Tonbridge and Malling. However, much of Tonbridge and Malling is within the Green Belt, including the Tonbridge 'hub,' and the considerations discussed below in relation to identification of further land at Tunbridge Wells are also relevant here.*

Tunbridge Wells

78. *Housing provision at Tunbridge Wells has been increased by 20% (+1,000 dwellings) in comparison with the Draft Plan. In principle much of the provision and the bulk of the increase would be concentrated at the Tunbridge Wells urban area, consistent with its status as a regional hub and strong economic prospects - the main reasons for increasing the housing quantity. The Proposed Changes acknowledge that this is likely to require a 'small scale review' of the inner Green Belt boundary at Tunbridge Wells.*

79. *The Proposed Changes remain broadly in line with the long standing rate of housing provision at Tunbridge Wells determined through the Structure Plan, and are also in line with the scale of projected locally-generated household growth. There will also be some additional scope for securing affordable housing within the overall supply.*

80. *Urban capacity has long been the main source of housing supply in Tunbridge Wells, with sustained protection of the Green Belt. National policy (PPS3) now largely precludes allowance for such 'windfall sites'¹¹ in preparing development plans, irrespective of their past significance, and emphasises an identified supply of sites. The scope to identify urban capacity sites will be important in determining the wider impact of the Proposed Changes on land release and the extent of any necessary review of the Green Belt at Tunbridge Wells. Given the continued protection given by the Plan to the broad extent of Green Belts in the region, the County Council objects strongly to the possible review of Green Belt. The Plan should make clear (e.g. in the Tonbridge /Tunbridge Wells policy ASOR3) that*

¹¹ Sites which become available for development which were not previously identified as allocations or identified as commitments through previous planning permissions

minimising the call on Green Belt land is a genuine local circumstances in terms of national policy (PPS3) that warrants allowance being made for windfall sites, supported by appropriate evidence of the form and rate of their contribution in the past. Without assurance that this can, and should, be considered in meeting the dwelling provision of the Plan, strong objection is raised to the Proposed Change for 6,000 dwellings.

Delivery of Housing Provision

81. Policy H2 is a new policy relating to the delivery of housing numbers in both Districts and sub regions, the latter through partnership working. Local authorities are to:

- plan for an 'upward trajectory' of housing completions
- consider the scope for acceleration of housing delivery in the Growth Areas and Growth Point;
- consider the scope for additional sources of housing supply, including change of use of non-residential development sites
- consider the feasibility of maximising delivery of housing capacity unlocked by investment in infrastructure at the 'earliest possible opportunity'
- provide a sufficient quantity and mix of housing in rural areas to ensure the long term sustainability of rural areas;

Comment

82. *The new policy is an opportunistic approach to securing delivery of additional housing. Testing of 'longer term issues' arising from the Growth Point proposals (Maidstone and Dover in Kent) runs counter to the view expressed by Government at the EIP that Growth Point status applied to the period to 2016, with longer term potential a matter for an RSS review. The policy is likely to generate additional pressure for the use of employment sites for housing at a time when there has been substantial erosion of employment land, particularly in areas of high housing demand. Local authorities are being urged to test housing figures higher than those in the plan, but the Plan acknowledges there is a deficit in the quantity and nature of employment land provision.*

83. *The text supporting Policy H2 exhorts local authorities to test higher levels of housing provision. This will generate considerable uncertainty during LDF preparation about the housing numbers to be tested, and the criteria that should guide this – what is to constitute sufficient testing? It also injects uncertainty about the local strategy for the location of housing development, and for infrastructure providers.*

84. *There is also a risk that the terms of H2 on delivery of housing capacity and investment in new infrastructure puts pressure on the coordinated delivery of new infrastructure to serve the scale and pace of the housing development.*

Affordable Housing

85. Policy H3 (Affordable Housing) confirms the regional targets for the provision of affordable housing (25% of all new housing to be social rented, and 10% other forms of affordable housing). It also adopts a more corporate, spatial planning approach to the delivery of affordable housing, cross referenced to the *Regional Housing Strategy* and the role of *Strategic Housing Market Assessments*. There is now provision for locally-set thresholds for the size of site above which an affordable

housing contribution will be required, and clarification that where indicative targets are set for sub regions in the Plan these should take precedence over the regional target. This is relevant to Kent where the targets for Kent Thames Gateway and East Kent and Ashford are lower (30%) than the regional target of 35%.

Comment

86. *The Proposed Changes to this policy are generally welcomed. It would however be helpful if the phrase “other forms of affordable housing” were replaced by “intermediate housing” consistent with national policy guidance (PPS3).*

87. *Given the direct relationship between total housing provision and affordable housing targets, the effect of the Proposed Changes is to increase the affordable housing requirement and associated investment in the region and Kent. There is a lack of recognition of the scale of the additional investment required to deliver the affordable housing targets. Regionally it has been estimated that an additional £400m was required over 3 years to meet the level of affordable housing provision proposed by the Panel, and this will increase as a result of the Proposed Changes.*

Chapter 8: Transport

88. The context for this chapter lists the region’s key transport challenges :

- good access to ports and airports
- high quality radial links to London and better orbital movement around it
- delivering transport measures which address severe deprivation
- addressing unpredictable journeys in buoyant areas
- reducing the impact of transport on the environment

89. Mobility management policies are placed first, underlining the priority the Secretary of State attaches to this. Policy T2 sets out a package of mobility management measures which Local Development Documents and Local Transport Plans should seek to incorporate, while Policy T3 puts particular onus on authorities responsible for hubs to test road charging initiatives. Policy T4 calls for restraint-based maximum parking standards for non-residential development, linked to improved public transport.

90. Policy T5 removes the requirement for all major travel-generating developments to have travel plans by 2011 in favour of more general requirement for LDFs to say which developments should have them.

Comment

91. *The amendments to policy T5 regarding travel plans are regrettable – current strategic policy for Kent through the Structure Plan (Policy TP3) establishes a requirement for travel plans for larger developments generating significant demand for travel, and the draft South East Plan policy would have maintained this principle on a wide area basis as part of the statutory development plan .*

Regional Hubs and Spokes

92. The EIP Panel’s recommendation for the addition of a regional ‘spoke’ from Dover to Thanet has not been accepted. The Secretary of State maintains that the primary purpose of ‘spokes’ is not to support regeneration (the reason invoked by the

Panel) but to support the regional hubs through links that enhance accessibility by public transport. Although Dover is now a hub, Thanet is not, and the proposed spoke in the Government's view has '*low level local usage that is not part of the strategic regional network*'.

Comment

93. *The County Council objects strongly to the omission of the EIP Panel recommendation on this issue. The network of hubs and spokes is not exclusively concerned with connections between hubs (e.g. there is a 'spoke' from the Medway Towns to the Gateway at Sheerness). Equally, spokes are not confined to nationally significant movement corridors – for example there is a 'spoke' from the hub at Canterbury to Thanet.*

94. *Dover is both a hub and an international Gateway, and the Dover-Thanet corridor serves the Gateway at Manston and the regionally significant port at Ramsgate. Policy T8 provides that the role of regional spokes should be developed through supporting the economic role of hubs and improving access to international Gateways. The Regional Transport Strategy supports economic regeneration in East Kent through improved accessibility.*

95. *The County Council notes that a series of spokes provide a continuous corridor along the south coast between Southampton and Dover. The absence of a Dover – Thanet spoke is an anomaly in not providing policy support for improved coastal connections in East Kent..*

Airports and Ports

96. In line with the Air Transport White Paper, Policy T9 removes qualifications to support for airport expansion at Heathrow, and provides for safeguarding land for a possible new runway at Gatwick after 2019. An enhanced role is confirmed for Kent International Airport as an airport of 'regional significance', but consistent with the Panel's recommendations there is no reference in the Plan to the role of Lydd airport.

97. Policy T10 (Ports and Short Sea Shipping) includes reference to priority for the preparation of port Master Plans for the major ports (including Dover and Sheerness and Thamesport).

Intermodal (Road/Rail Freight) Interchanges

98. The Government accepts the Panel Recommendation that Policy T13 should be retained, with minor amendment. This policy requires that the Regional Assembly should work with partner organisations, including local authorities, to "*identify broad locations within the region for up to three intermodal interchange facilities...*"¹². They should be well related to :

- rail and road corridors capable of accommodating the anticipated level of freight movements
- proposed markets
- London

¹² This draws on previous work by the former Strategic Rail Authority (March 2004). This referred to 3 or 4 locations within London and the wider South East region, and not the South East Plan area.

The Government also accepts the Panel Recommendation that these facilities should have the potential to “deliver modal shift”.

99. The Government’s proposed supporting text identifies a number of criteria for inter-modal interchange terminals and their location, based on work by the former Strategic Rail Authority. It concludes that suitable sites are likely to be where the key rail and road radials intersect with the M25. The Panel’s recommendation for reference to the potential for an inter-modal interchange “*towards the north–western end of the Channel Tunnel- London corridor*” is not accepted by the Government in their Proposed Changes.

Comment

100. *The amendment to T13 that requires intermodal interchange facilities to deliver modal shift to rail is supported, although this could be usefully sharpened to refer to a ‘substantial shift in favour of rail within the region’.*

101 *Policy T13 refers to joint working with partners to identify broad locations ‘within the region’ for up to three facilities. The Government makes clear in the text that the context for this is work undertaken by the former Strategic Rail Authority in which they identified a need for “between three and four ... terminals to serve London and South East England”. The SRA study included London and much of the East of England, and provides no basis for “up to three facilities” in the much smaller South East administrative region. KCC therefore has strong objection to the presumption of up to three facilities in the South East Plan. Specifically there is no case for provision of such interchange facilities in Kent, where transfer of freight to rail should be enabled at the ports, and by through rail freight via the Channel Tunnel. The wider London and South East region should be the context for assessing the provision of intermodal facilities. The supporting text should make clear how the conclusions of the joint work advocated by Policy T13 will be used, and whether they will be part of an early Review of the Plan*

Transport Investment and Management Priorities

102. A new policy (T14) sets up strategic transport investment and management priorities and machinery for delivering them. It gives priority to demand management measures, including those that make best use of existing infrastructure, and promotes sustainable travel in developing schemes additional to current commitments. The policy provides a link to the identification of transport schemes of key regional importance. Appendix A lists regionally significant investment in transport infrastructure that is currently programmed. In the Kent this includes:

Programmed for delivery 2006-2011

Sittingbourne Northern Relief Road
M20 Junction 10A
East Kent Access Phase 2
High speed domestic services – Kent to St Pancras
Rushenden Link
Dartford Station
Northfleet Station

Programmed for delivery 2011-2016

Thameslink
M25 J5-7 Widening

A21 Tonbridge – Pembury
A21 Kippings Cross to Lamberhurst

Regional Funding Allocation (RFA) Interventions not yet approved by DfT

Ashford Smartlink
A2 Bean Junction

RFA Priorities post 2016

RFA elements of Access to Dover package

Comment

103. *The extensive list of projects in the Appendix accompanying Policy T14 would be better located within the Implementation Plan which will be subject to regular review. This is particularly applicable to specific projects (rather than broad outcomes) that are not in firm programmes. Post 2016 the Regional Funding Allocation priorities are currently under investigation.*

Areas for further investigation

104. The text refers to priority transport links identified as likely to come under increasing transport pressure as a result of traffic growth and the development strategy of the RSS. These include the A2/282/M2 corridor (including Thames Crossing options). The text also indicates further work to be undertaken inter alia as follows :

- to assess the transport implications of growth and development covering the second round of Growth Points (i.e. including Dover), and including development proposals in Canterbury, Herne Bay and Whitstable, Thanet, Shepway , Sittingbourne and Sheppey.
- further development of a cross modal regional freight strategy, with a greater locational specificity for inter-modal interchanges, and lorry parking and rest areas.

Chapter 9: Natural Resource Management

Water Resources and Water Quality

105. The Policy on Water Resources and Groundwater (NRM1) has been amended in response to the Sustainability Appraisal of the Proposed Changes, to include a clause requiring Local Development Frameworks to direct development within Districts to areas where adequate water supply can be guaranteed, and/or to phase development so that 'sustainable new capacity' can be provided ahead of new development. The policy clause requiring developments to incorporate water efficiency to BREEAM standards is deleted in favour of one enabling Local Development Frameworks to identify circumstances in which higher standards are justified.

106. In line with the Panel's recommendation, policy on water resources and water quality have been separated with a new policy (NRM2) on Water Quality.

Comment

107. *While it is understood that there is a national agenda for progressively tightening standards on water efficiency, the circumstances of the South East as a designated area of 'serious water stress' should be more explicitly reflected in the supporting text, and a positive stance taken within Policy NRM1 to require identification of circumstances within LDFs where tighter water efficiency standards should be pursued more urgently.*

108. *The approach taken in NRM1 to direct development, through LDFs and determination of planning applications, to where water supply can be guaranteed, will apply within individual Districts. It is not clear what actions follow if constraints apply on a District wide basis, or if there are conflicts between a pattern of development for which there is capacity in water supply terms but which runs counter to the wider intent of spatial strategy, e.g. an urban focus to development, and concentration at hub settlements.*

Conservation and Improvement of Biodiversity

109. This policy (NRM5) has been strengthened in line with EIP Panel recommendations with amendments to:

- provide high protection to nationally designated sites;
- protect areas around internationally designated sites to support species for which sites have been designated;
- provide for connection between sites as an element of biodiversity improvement;
- add reference to the importance of soils in contributing to biodiversity;
- include reference to promoting policies that integrate accommodation of changes in agriculture with the implications of resultant development in the countryside;
- require the development and implementation of green infrastructure in conjunction with new development;
- identify sites of international nature conservation interest sensitive to the pressures of recreation or urbanisation, and identify mitigation measures (buffer zones, provision of alternative recreational land, access and habitat management measures).

Comment

110. *These changes are generally supported, although the intent of the clause on agricultural change is not clear. Given the specific and separate policy now to be included in the Plan on the effects of residential development on the Thames Basin Heaths Special Protection Area, it would be helpful to clarify whether and where a similar approach is necessary or appropriate in relation to other similarly designated areas.*

Chapter 10: Waste and Minerals

Waste

111. The proposed changes to policies are limited and include some strengthening to add force to their implementation.

112. Policy W2 (Sustainable Design, Construction and Demolition) is amended to refer to Growth Points (i.e. Maidstone and Dover in Kent) and Strategic Development Areas, as well as the Growth Areas (Kent Thames Gateway and Ashford) as locations where development should demonstrate and employ best practice in design and construction for waste minimisation and recycling.

Comment

113. *While it may not be practical to apply different standards of design for waste minimisation and recycling to new development on the basis of the policy status of an area in the South East Plan, it is nonetheless important that these objectives are fulfilled in areas where development is the most substantial .*

Regional Self Sufficiency – London waste exports

114. Policy W3 requires that *“Waste authorities and waste management companies should provide management capacity equivalent to the amount of waste arising and requiring management within the region’s boundaries, plus a declining amount of waste from London.”* Provision for London’s exports of waste will usually be limited to landfill, and by 2016 new permissions will only provide for residues of waste that have been subject to recycling or other recovery process.

115. The quantities in the draft Plan were based on projecting forward to 2015 an estimate of municipal waste (MW) and Commercial and Industrial Waste (CI) exported from London to the region of 1.76 million tonnes in 2005. This quantity was assumed to reduce after 2015.

116. Policy W3 apportions London’s exported waste between Waste Planning Authorities in the South East. In the Draft Plan, Kent and Medway were to take 12.2%, giving a total of 2 million tonnes in the period 2006-2015 and 1.2 million tonnes 2016 – 2025.

117. The Government now proposes:

- to base the total quantity of waste to be apportioned on a lower estimate of London exports of 1.21 million tonnes in 2006.
- to increase the share of the total taken by Kent and Medway to **13.1%** in the first period of the plan to 2015.
- to consequently reduce the quantity taken by Kent and Medway to **1.58 million tonnes in the first period, and 0.88 million tonnes in the second period.**

118. At the Examination, Kent and Medway accepted a substantial rise in the share of London’s exported waste that they would accommodate, from the recent level of about 2.7% to the 12.2% proposed in the Draft Plan. However, Kent and the other Waste Planning Authorities argued that the apportionment should apply only from 2016.

119. The Government accepts the Panel’s view that the apportionment should apply from 2006, even though it is recognised that in practice there will be a period of transition, because existing waste disposal contracts will continue to determine the distribution of waste sent to landfill.

120. The increased share proposed for Kent and Medway (13.1%) arises because the adopted Minerals and Waste Core Strategy for Hampshire has concluded that the County cannot make provision for increased landfill in the period to 2015. The Proposed Changes increase the share taken by all other Waste Planning Authorities to compensate. However the changes taken together reduce the quantity of London waste for which landfill should be provided in Kent and Medway from 3.2 million tonnes to 2.46 million tonnes by 2025.

Comment

121. *The proposed changes to Policy W3 are unsatisfactory in a number of respects:*

- Estimates of MW and CI waste exported from London are volatile, with a value of 1.76 million tonnes estimated for 2005, and 1.21 million in 2006. The quantities extrapolated to 2015 in Policy W3 are therefore very uncertain.*
- It is assumed that the quantities will reduce after 2015 in line with the landfill reduction policies of the South East Plan. The quantities are not based directly on the forecasts and policies of London authorities.*
- The EIP Panel and Government recognise that there will be a transition period as existing waste disposal contracts will delay any opportunity to change the distribution on London waste exports. Kent for example has some landfill capacity in the first period of the Plan, but this is unlikely to receive increased London waste for contractual and cost reasons. The provisions of the Plan for the period 2006-15 cannot in practice be realised, and this has been accepted in the case of Hampshire. The quantities in the policy could be overtaken, for example by contracts with operators of suitable large landfill sites, possibly perpetuating the existing pattern.*
- The text states that Policy W3 quantities are “for further testing in the production of Waste Development Frameworks”. It is a matter of chance that a single Core Strategy (Hampshire) has been adopted at a time when the policy is still subject to debate. However the Policy does not stipulate how it is to be applied if and when other Core Strategies are adopted with a similar conclusion to Hampshire.*
- Policy W3 proposes a dispersed distribution of imports from London based on a number of criteria. This results in the need for additional landfill capacity in Waste Planning Authorities or sub regions generally in the order of 2 to 3 million tonnes capacity. New landfill of this scale might not be large enough to be viable.*
- Moreover it is unlikely that a single landfill provision would be suitable. The implication of Policy W3 is that until 2016 unprocessed MW and CI waste can be exported to the South East for non-hazardous landfill, but beyond 2016 only residues should be exported that would require primarily inert or hazardous landfill. The plan provides no indication of the balance of landfill types required to accommodate London’s waste.*
- The Draft Plan calculates total London waste exports for 2006-2015 on a multiple of 9.5 years applied to the base year value of 1.76 million tonnes. The same multiple applied to the revised base year value of 1.21 million*

tonnes would give a total of 11.5 million tonnes, and not the 12.1 million tonnes proposed by the Government.

122. In summary:

- *KCC objects to the increased shares of London waste to be taken by waste planning authorities to compensate for the Hampshire circumstance. Policy W3 does not, and should not, require other areas to compensate in an ad hoc manner for areas where Development Frameworks conclude that new landfill is not possible.*
- *The Policy W3 quantities fail to provide adequate justification of the scale of provision to be made by Waste Planning Authorities, and no guidance on the type of landfill. There is no means of ensuring that provision of new landfill in line with Policy W3 would be used for London waste exports.*
- *The text refers to quantities in Policy W3 being “used as the basis for further testing in ... Waste Development Frameworks taking into account more detailed information about site suitability and availability”, and this should be incorporated in Policy W3.*
- *The definitions proposed by the Government should be incorporated as footnotes to Policy W3, rather than falling within the text.*
- *London apportionment should be addressed as part of a review of waste policies overall in the next Review of the South East Plan. This should consider London exports in the context of the wider South East, the policies of waste planning authorities in London, and the practical opportunities for disposal of London waste. In the interim the quantities for Waste Planning Authorities and sub regions in Policy W3 should be dropped in favour of an overall South East total.*

Policy W7: Waste Management Capacity Requirements

123. Policy W7 states that waste planning authorities will provide development opportunities to achieve the targets set by the South East Plan. The policy provides rates of waste to be managed for MW and CI that provide benchmarks for the preparation of Development Plan Documents. The Government proposes no changes to the quantities of waste, but clarifies the Waste Planning Authorities to which the quantities apply.

Comment

124. *The County Council has no objection to these changes. However, Table 1 preceding Policy W7 in the Draft Plan sets out the additional waste processing capacity required at 2015 to meet the provisions of Policies W5, W6 and W7. The quantities are based upon advice published in 2005. Work on the Kent Minerals & Waste Development Framework suggests that the quantities need to be revised, in particular to reflect lower Municipal Waste arisings than previously forecast, updated assessment of the existing capacity, and updated forecasts of waste. The supporting text should acknowledge that Waste Development Frameworks should have regard to more recent data in assessing the quantities contained in Policy W7 and the illustrative additional capacity in Table 1. A review of waste policies and quantities in the next Review of the South East Plan is called for.*

Hazardous Waste

125. Policy W15 includes current priority needs for treatment and landfill of hazardous waste. Government proposes to accept EIP Panel recommendations to:

- delete specific reference to Kent and neighbouring counties in the part of the policy addressing hazardous waste landfill capacity to serve the needs of the south and south-east of the region
- not specify the number of plant required in the region for certain specialised treatment facilities

Comment

126. The County Council supports these changes as providing for greater flexibility in response to the assessment of hazardous waste needs in the region. The supporting text could however be strengthened to refer to the Assembly's current study of hazardous waste and to nuclear waste, particularly arising from the current decommissioning of Dungeness A power station.

Location of Waste Management Facilities

127. Draft Policy W17 establishes criteria for assessing the suitability of existing and new sites for the location of waste management facilities¹³, and states that sites in the Green Belt and small scale waste management facilities in Areas of Outstanding Natural Beauty and National Parks should not be precluded provided certain conditions are met. The Proposed Changes intend that the majority of these conditions are deleted, retaining only the requirement that developments in AONB's/National Parks do not compromise the objectives of the designation

Comment

128. The dilution of these criteria, particularly in relation to waste uses in Green Belts, weakens planning policy control. The supporting text explains that this is necessary in the South East if more environmentally sustainable forms of waste management are to be provided. The text also explains that it is important not to stifle technological innovation, and that the types of facility justified in Green Belts and AONBs are likely to differ. However, the Plan's policies have to be applied in conjunction with prevailing national policy towards Green Belts and AONBs, and the County Council objects to the deletion of the assessment and location criteria in the last part of Policy W17.

Minerals

129. The proposed apportionment of provision for secondary and recycled aggregates to minerals planning authority areas (Policy M2) was the only significant addition to the regional minerals strategy which was approved in 2006. The Proposed Changes confirm the apportionment to Kent of 1.4 million tonnes per annum), but there is recognition that this is for testing in preparation of Development Frameworks. Amendments to Policy M2 indicate that the criteria applicable to the location of waste management facilities (see above) apply to proposals for mineral recycling facilities.

¹³ The policy also applies to proposals for minerals recycling facilities

Comment

130. *The recognition of local testing of the apportionment is welcomed. The Proposed Changes are confusing, as inclusion of a cross reference to the criteria, as revised in Policy W17, sits alongside the original and unchanged locational criteria within Policy M2, which are more detailed and prescriptive regarding sites in Green Belt or AONB locations.*

Chapter 11: Countryside and Landscape Management

131. Policy has been strengthened in line with the Panel recommendations to:

- require a high_level of protection for AONBs.
- include reference to the role of landscape character assessments to inform plans and development of criteria based policies
- ensure local authorities target positive management on areas where urban extensions are planned to ensure early consideration of landscape and biodiversity enhancement, woodland management and recreation and access routes
- encourage a coordinated approach to planning and decision making along the river Thames (west of Hampton)

Comment

132. *The changes are generally welcomed, but a major concern for Kent has been the future of **Special Landscape Area** designations. These areas of county wide significance for their landscape value have been designated for a long period through the Structure Plan, and were confirmed by the 2006 Kent & Medway Structure Plan. However neither the principle nor the detail of these designations were taken forward in the South East Plan, and despite Kent's representations they did not receive support from the Panel, or in the Government's Proposed Changes. Sub national designations of this nature are not supported in national planning guidance on rural areas. Their loss will be very regrettable as they are a valuable factor in assessing the best pattern of development, and the impact of development proposals. KCC should press for the Structure Plan policy on Special Landscape Areas to be 'saved' beyond the adoption of the South East Plan, and this will require the support of SEERA and the Government Office. The Government does propose to change Policy C4 to state that planning authorities should "aim to protect and enhance ...local distinctiveness of ...landscape" and "ensure that all development respects and enhances local landscape character". It would be logical to accept local designation of special landscape value, and it is proposed that KCC object to the absence of such a policy in the Plan, and the recognition of existing designations that should be retained.*

133. *It is noted from the supporting text that the new policy on the River Thames Corridor (Policy C7) is confined to the Corridor upstream of Hampton and in this sector replaces current sub regional guidance (RPG3b/9b) for the Corridor as a whole. It would be helpful for the policy itself to make clear its geographical scope. There should also be some clarification as to how and when guidance for the Thames Corridor east of London within the South East region (RPG9b) should be reviewed within the context of the South East Plan.*

Chapter 13: Town Centres

134. Policy TC2 reflects a revised Strategic Network of Town Centres which now defines 12 'Centres for Significant Change' (including **Ashford** and **Chatham** in Kent), Primary Regional Centres (**Canterbury, Maidstone, Tonbridge-Tunbridge Wells**) and Secondary Regional Centres (**Dartford, Dover, Folkestone, Gravesend, Sevenoaks, Sittingbourne and Westwood Cross**).

135. Bluewater/Ebbsfleet has been deleted from the hierarchy of centres. Bluewater is treated as a regional out of centre shopping centre. No need is envisaged for large scale extension to such existing centres in the period to 2026.

Comment

136. *The County Council objects to the inclusion of a new category of 'Centres of Significant Change in Policy TC1 which suggests that these centres have a different role from Primary Regional Centres. Although these centres are expected to undergo significant change during the Plan period their role will remain comparable to that of a Primary Regional centre in the region's strategic network. They do not constitute a separate tier performing a higher level role. Such an interpretation would be inconsistent with the thrust of the supporting text, and with the role of the other centres in the network which are also expected to be the focus for town centre development of more than local importance. The latter includes references to local considerations for rebalancing the network, and this is potentially significant for secondary regional centres such as Sittingbourne in Kent.*

137. *The recognition of Westwood Cross in Thanet within the centre network is supported and consistent with the approach taken in the Kent and Medway Structure Plan. The Thanet towns have lacked a single prime focus centrally located within the urban area, and this has prejudiced the attraction of higher order comparison goods shopping.*

138. *The deletion of combined Bluewater/Ebbsfleet entity from the centre network is supported. This linkage was potentially confusing in that Ebbsfleet is not intended as key retail centre.*

139. *However the approach to Bluewater does not take account of its distinctive and changing circumstances. It is located centrally within a regional Growth Area (Kent Thames Gateway) where substantial population and housing growth is planned. Bluewater is a major centre for retail, leisure and entertainment, and over the period of the South East Plan it will mature as a major central place for these purposes, and be progressively well connected through road links and new public transport systems to the whole of Kent Thameside. Being in close proximity to the A2 and the new international and domestic stations at Ebbsfleet it will increasingly serve a wider region. Bluewater is not solely served by car - there is a good and developing bus system, and it is well served by Ebbsfleet and Greenhithe stations, and by the high capacity 'Fastrack' public transport system, linking Dartford town centre, Bluewater, Ebbsfleet and Gravesend town centre. In these respects the tests of improved accessibility by non car transport modes, applied elsewhere under sub regional policies for Kent Thames Gateway (new Policy KTG5), are being fulfilled.*

140. *Securing the appropriate balance of development at Bluewater vis a vis the complementary role of other strategic centres within and beyond Kent Thameside should be the subject of further assessment and guidance, given Bluewater's*

regional 'reach'. The key tests provided in current Structure Plan policy regarding the impact of further development at Bluewater, on both the vitality and investment prospects for other strategic centres, should be retained.

Sub Regional Strategies

141. The sub regional strategies in the draft South East Plan are based on advice to the Regional Assembly submitted by the Principal Authorities in the region which include KCC and Medway. By and large the advice submitted by Kent in respect of the East Kent & Ashford and Kent Thames Gateway sub regions has been endorsed by the EIP Panel and through the Proposed Changes.

Chapter 18: East Kent and Ashford

142. Some restructuring and re-sequencing of policies is proposed. The substantive changes are:

- Policy EKA1 (Core Strategy) incorporates reference to the potential for housing and businesses served by CTRL domestic services, especially at Ashford. The role of **Dover** among the coastal towns is now identified.
- Policy EKA2 is a new consolidated framework for **Ashford's** growth. This deals with local resource use, sustainable design and community facilities. The supporting text stresses the need to ensure that Ashford does not become over dependent on commuting
- Policy EKA3 sets out revised housing quantities for the area (see also Chapter 7 above), but with deletion of phasing pre and post 2016 in light of the Secretary of State's view that an immediate step change in housing provision is required. The housing total for East Kent and Ashford 2006-2026 is now **56,700 (2,835 per annum)**, an increase of **8,700 (18%)** on the Draft Plan, and **7%** above the Panel's recommendation.
- 'Active pre planning' to achieve capacity increases in strategic infrastructure and facilities is advocated, particularly at Ashford. An indicative target of 30% affordable housing for East Kent and Ashford is confirmed.
- Policy EKA4 (Urban Renaissance of the Coastal Towns) has a clause added providing for a broad balance between new housing and new jobs at each urban area, formerly clause i) of EKA8.
- New policy EKA8 (Effective Delivery) addresses Ashford Delivery Board and exploration of mechanisms for forward funding of strategic infrastructure. It also requires further work on the linkages between infrastructure provision and development in other parts of East Kent to inform identification of priorities.

143. The supporting text refers to the following as key issues:

- New public transport and highway networks at **Ashford**
- Improved access and management to **Dover** to allow management of international traffic, reduce congestion within the town and support 'allocated sites to the north of the town'

- Improved access to **Canterbury** to assist the economic contribution of the City to be realised, and to reduce pressure

Comment

144. *The County Council's concerns and objections regarding increased housing provision at Canterbury are set out above in relation to Policy H1, but also apply to Policy EKA3*

145 *The removal of the phasing for housing is regrettable, especially in the context of higher housing provision in the sub region which, if pursued, will need to be delivered in a sustainable, plan led manner. This will have implications for the trajectory of housing delivery over the South East Plan period. It is noted that the EIP Panel's conclusions both accepted the role of phasing, and recommended that phasing of the increase in provision recommended for Thanet, Dover and Canterbury should be heavily weighted towards the second half of the South East Plan period.*

146. *Policy EKA1 (Core Strategy) recognises Ashford's role as a Growth Area. Although there is specific reference to Dover, the status it now has as a New Growth Point could be more explicitly recognised in EKA1 (ii) and in the supporting text.*

147. *Government is indicating that it does not support the Panel's recommendation to define a regional 'spoke' between Dover and Thanet but an insertion in Map T2 and the Key Diagram is nonetheless proposed. This needs to be clarified. For the reasons stated above (Chapter 8) the County Council advocates the insertion of such a 'spoke'.*

Chapter 19: Kent Thames Gateway

148. Some restructuring and re-sequencing of policies is proposed. The substantive changes are:

- Policy KTG1 (Core Strategy) – reference to defined Strategic Gaps is deleted (consistent with deletion of the core regional policy on this), and replaced with reference to avoiding coalescence to the south, east and west of the Medway urban area, and to the west of Sittingbourne.
- This policy also requires a review of local planning and transport policies to manage forecast growth in car traffic and encourage greater use of sustainable transport modes.
- Policy KTG3 (Employment Locations) now highlights access to the national rail network as well as the M25 as a consideration for major sites in Thameside.
- Policy KTG3 sets out revised housing quantities for Kent Thames Gateway (see also Chapter 7 above) but with deletion of the original phasing provisions (pre/post 2016). These now total **52,140 dwellings (2,607 per annum)** for 2006-20126, an increase of 4,140 (**9%**) on the Draft Plan, and 3,140 (6%) above the Panel's recommendation.
- Increased housing quantities are concentrated in Swale and Dartford.

- An indicative target of 30% affordable housing for Kent Thames Gateway is confirmed.
- Policy criteria relating to the impacts of delay in infrastructure provision on development are deleted (as per Panel recommendation) and replaced by reference to the need for 'active pre planning'
- Policy KTG5 (Role of Retail Centres) – the clause providing for limited additional floorspace at **Bluewater**, where required to maintain the specialist role of the centre, is deleted. Policy now refers to Bluewater continuing its specialist role, but as an out of centre regional centre with any proposals for additional floorspace to be considered through a review of the RSS, and allied to improved access to the centre by non car modes.
- Policy on flood risk (KTG6) includes new reference to the need to identify flood storage areas to contribute to green infrastructure networks. KTG7 on Green Initiatives now refers to Thames Gateway Parklands.
- The policy in the Draft Plan on Infrastructure is replaced by a section on *Implementation and Delivery* which emphasises the need to create a skilled and qualified workforce, the provision of environmental infrastructure, the role of acute health services in a Growth Area, and of Higher Education at Chatham and Ebbsfleet. Key transport themes highlighted are the A2/A282/M2 corridor, a study of Thames Crossing options, Crossrail and CTRL related improvements, Fastrack, and other schemes to promote modal shift.

Comment:

149. *The County Council's concerns and objections regarding increased housing provision at Dartford are set out above in relation to Policy H1 but are also applicable to Policy KTG4.*

150. *The removal of the phasing of housing is regrettable, especially in the context of higher housing provisions for Kent Thames Gateway which, if pursued, will need to be delivered in a sustainable, plan led manner. This will have implications for the trajectory of housing delivery over the South East Plan period. It is noted that the EIP Panel's conclusions both accepted the role of phasing and recommended that phasing of the increases in provision it recommended for Swale should be heavily weighted towards the second half of the South East Plan period.*

151. *Commensurate with its objection to the deletion of the core regional policy on Strategic Gaps, the County Council objects to the deletion from KTG1 of reference to the defined (Mid Kent and Medway-Sittingbourne) Strategic Gaps. The proposed rewording of KTG1 is confusing (referring to avoiding coalescence with adjoining settlements,) and more restrictive in its anti-coalescence objectives than the objectives underpinning the current Structure Plan Strategic Gap designations.¹⁴*

152. *The concerns of the County Council regarding the policy treatment of Bluewater in Policies TC1, TC3 and KTG5 have been set out under Chapter 13 (Town Centres).*

¹⁴ See paras 2.24 – 2.27 and Policy SS3 of the Kent and Medway Structure plan (2006)

Chapter 20: London fringe

153. Policy LF3 – reduces housing provision (-300) for the part of Sevenoaks District within the London Fringe as sought by KCC at the EIP and agreed by the Panel.

Comment

154. *This is welcomed.*

Chapter 25: Areas Outside Sub Regions (Rest of Kent)

Maidstone Hub

155. A new Policy (AOSR2) for the Maidstone Hub requires the Maidstone Local Development Framework to:

- make new provision for housing consistent with its growth role including associated transport infrastructure
- provide for employment of ‘sub regional significance’ with an emphasis on ‘higher quality’ jobs to enhance its role as the county town and a centre for business
- make Maidstone a focus for expansion and investment in new further or higher education facilities
- ensure that development at Maidstone complements rather than competes with Kent Thames Gateway and not add to travel pressures between them
- avoid coalescence between Maidstone and the Medway Gap area

156. The text refers to an indicative 90% of new housing being within, or adjacent to, the town.

Comment

157. *The reference in AOSR2 to Maidstone’s growth role would be more appropriately expressed as its role as a ‘New Growth Point’. The supporting text on the basis for Maidstone’s hub status could be more accurately described. Maidstone is not served by CTRL domestic rail services or the faster existing routes to London. It is suggested that this be rephrased to read :*

‘It is designated as a hub under Policy SP2 of this Plan as it serves as an interchange point between local rail services and London services, and is well related to the strategic road network. .

Tonbridge /Tunbridge Wells Hub

158. A new Policy AOSR3 on the Tonbridge-Tunbridge Wells hub incorporates relevant elements of former Policy CC8c. The supporting text refers to supporting the hub role through improvements to links with East Sussex, Crawley/Gatwick and Maidstone, along with sustainable transport links between the two hub towns. Reference is made to a likely need for a small scale Green Belt review at Tunbridge Wells

Comment

159. *The County Council's comments on the housing provision proposed for Tunbridge Wells and its relationship with a need for review of the Green Belt are set out above under Policy H1.*

160. *The references to improved links between the Tonbridge –Tunbridge Wells hub and Crawley/Gatwick and Maidstone are supported. However it is noted that while the hubs and spokes network incorporates the Tonbridge/Tunbridge Wells and Crawley/Gatwick corridor it does not acknowledge the Tonbridge/Tunbridge Wells – Maidstone corridor linking two regional hubs. This appears at odds with the role of spokes as identified in the Proposed Changes and does not reflect the stated objectives of Policy AOSR3.*

Chapter 26: Implementation, Monitoring and Review

161. A new chapter is to be added on *Implementation and Monitoring* as per the Panel's recommendation. It refers to four main delivery mechanisms for plan implementation ; the need to promote behavioural change particularly on transport, water, waste and energy; the role of fiscal incentives and regulatory changes; and effective management of existing assets, along with investment in additional infrastructure capacity.

162. The Implementation Plan itself (including the Investment Frameworks for each of the sub regions) is non statutory, and does not form part of the RSS. It is not therefore the subject of Proposed Changes.

Comment

163. *Given the significance of the Implementation Plan in setting out the infrastructure investment programmes and other delivery arrangements needed to support the Plan, it is regrettable that the Implementation Plan cannot be an integral part of the statutory RSS and hence by approved by Government. This is important given the EIP Panel's conclusions on the 'uncomfortable' relationship between the short term process of spending reviews and the long term commitment need to deliver major development, the discontinuity between national fiscal policy and the regional strategy and the need to influence mainstream programme funding¹⁵.*

Next Steps

164. Following the Secretary of State's consideration of the response to consultation on the Proposed Changes to the South East Plan, the next stage will be its final approval, probably in the early part of 2009. At this point the statutory policies of the Kent and Medway Structure Plan 2006 will cease to have effect, unless Government agrees that there is a case for policies to be 'saved' beyond this point. This matter now needs to be considered in the light of the proposed final version of the South East Plan. A case for retention would need to be robust, demonstrate a policy deficit in the new South East Plan, and not imply any conflict with current national or regional policies.

¹⁵ EIP Panel Report paras 2.27, 27.20 and 1.11

165. Both the EIP Panel report and the Proposed Changes indicate areas where an early review of the Plan is required. The Proposed Changes suggest that the Government does not believe that the South East Plan, including its currently proposed revisions, fully addresses the region's contribution to the national agenda for increased housing delivery, and the aim of the 2007 Housing Green Paper to achieve 3 million additional homes by 2020. The Green Paper refers to the need for an early review of Regional Spatial Strategies (RSS) to provide for this higher target at a regional and local level, and also indicates that Government would issue guidance to regions at the outset of RSS reviews on the range of housing provision to be tested. This would be based on advice from the National Housing and Planning Advice Unit. Its advice of June 2008 indicates the housing supply to be tested as between 37,800 and 49,700 dwellings per annum. The bottom end of this range is +14%) above the South East Plan provision of 33,125 homes per annum.

166. The presumption behind a review of the Plan is for a further increase in housing, but a such a review will also provide the opportunity to closely examine the factors and assumptions that lie behind the 'drivers' of higher housing change to which Government is referring e.g. long term projections of demographic and household growth, and sustained high levels of in migration to the UK and South East.

167. In addition to the housing provisions the Proposed Changes to the South East Plan indicate a number of other policy areas that will require updating in a first review of the plan. These include employment and land for economic development, identification of broad locations for strategic intermodal freight handling facilities, and accommodation of growth within the region's network of town centres. The scope of and timetable for a review is subject to discussion between the Regional Assembly and Government.

Recommendations

168. It is **recommended** that Cabinet:

- (i) note the key features of the Government's Proposed Changes to the South East Plan and agree the representations contained in the summary and the main report as the basis for the County Council's response to the consultation.
- (ii) authorise the Interim Managing Director for Environment and Regeneration in consultation with the Cabinet Member for Regeneration and Supporting Independence to:
 - (a) agree any further representations of a more detailed nature for inclusion in the response
 - (b) consider whether representations should be subsequently made to SEERA and Government for the retention ('saving') of any of the policies of the adopted Kent and Medway Structure Plan following final approval of the South East Plan

Background Documents

Government Office for the South East : The South East Plan : Secretary of State's Proposed Changes to the draft Regional Spatial Strategy for the South East of England : Schedule of Changes and Reasoned Justification July 2008

Government Office for the South East: The South East Plan: Secretary of State's Proposed Changes to the draft Regional Spatial Strategy for the South East of England: Companion Document. July 2008

Scott Wilson /Levett- Therivel : Regional Spatial Strategy for the South East : Sustainability Appraisal and Habitats Regulations Assessment of the Secretary of State's Proposed Changes . July 2008

The South East Plan: Examination in Public: November 2006-March 2007: Report of the Panel: August 2007

SEERA: Draft South East Plan: Submission to Government: March 2006

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APPENDIX 1 : South East Plan : Distribution of Housing Provision by County following Government Changes (July 2008)

	Draft SE Plan	EIP Panel Recommendation	Change	% Change from draft plan	Government Proposed Changes Jul-08	Change in relation to draft Plan	% change in relation to draft Plan	Share of Regional Provision
Berks	52480	68080	15600	29.7	61180	8700	16.6	9.2
Bucks	80800	86440	5640	7.0	86440	5640	7.0	13.0
E Sussex	38000	40000	2000	5.3	42400	4400	11.6	6.4
Hampshire	122000	128300	6300	5.2	133700	11700	9.6	20.2
IOW	10400	10400	0	0.0	10400	0	0.0	1.6
Kent	122000	131580	9580	7.9	139420	17420	14.3	21.0
Oxon	47200	54600	7400	15.7	55200	8000	16.9	8.3
Surrey	47200	56660	9460	20.0	59160	11960	25.3	8.9
W Sussex	58000	64100	6100	10.5	74600	16600	28.6	11.3
S East	578080	640160	62080	10.7	662500	84420	14.6	100.0