

Jill Peet
Principal Planning Officer Policy Section
Tonbridge & Malling Borough Council
Gibson Building, Gibson Drive
Kings Hill, West Malling
Kent ME19 4LZ

12 October 2006

Dear Ms Peet,

**RE: TONBRIDGE AND MALLING LOCAL DEVELOPMENT
FRAMEWORK – CORE STRATEGY SUBMISSION DRAFT**

Under the provisions of Section 24 of the Planning and Compulsory Purchase Act 2004 (the Act) the South East England Regional Assembly has assessed the general conformity of the Tonbridge and Malling Core Strategy submission document against the adopted Regional Spatial Strategy (RPG9 and Alterations) and also the emerging Regional Spatial Strategy (the Draft South East Plan, submitted to the Secretary of State on 31 March 2006).

Members of the Regional Planning Committee consider the Tonbridge and Malling Core Strategy to be in general conformity with both the adopted and emerging Regional Spatial Strategy. However, a number of specific aspects of the Core Strategy have been identified which do not appear to have had full regard to adopted or emerging RSS and the Assembly has submitted a number of additional representations on the separate representation forms. A summary of these is set out on the attached sheets.

If you have any comments or questions relating to this letter please do not hesitate to contact Sue Janota, Regional Planner, on 01483 555200 or at suejanota@southeast-ra.gov.uk.

Yours faithfully,

Catriona Riddell
Planning Strategy Director

South East England Regional Assembly – Summary of Representations

Representation 1

The Core Strategy should refer to Tonbridge-Tunbridge Wells as a regional hub as opposed to a transport hub and to the need to support and promote it as such as set out in policies CC8b and CC8c of the draft South East Plan.

Representation 2

To reflect Policies EN1, EN2 and EN4 of the draft South East Plan, the Core Strategy should be strengthened through references to achieving 10% of the energy demand for larger developments from renewable sources and encouraging the integration of combined heat and power, CHP, in development proposals where appropriate to reflect Policies EN1 and EN2 of the draft South East Plan. There should also be a commitment to contributing to the achievement of the sub-regional targets for land-based renewable energy in Policy EN4.

Representation 3

Policy T8 of the draft South East Plan (reflecting Policy T13 of the Regional Transport Strategy) advocates the identification of categories of major travel generating developments, both existing and proposed, for which travel plans should be adopted. The Core Strategy should identify the categories of development for which travel plans should be sought or indicate in which subsidiary local development document the detailed criteria will be provided.

Representation 4

Policy T12 of the Regional Transport Strategy (RPG9 as altered) and Policy T7 of the draft South East Plan support maximum parking standards and the provision of sufficient cycle parking at new developments. Restraint-based parking provision standards linked to public transport and accessibility improvements are important in rebalancing the transport system in favour of non-car modes. Policy CP2 of the Core Strategy should refer to the need to provide appropriate levels of car and cycle parking for residential and non-residential developments.

Representation 5

The draft South East plan seeks to ensure better management of the urban rural fringe including, where applicable, Green Belt, and promotes the development of strategies and action plans to deliver a sustainable multi-functional urban rural fringe. The Core Strategy should be strengthened by encouraging the identification of areas of urban rural fringe and the development of management and action plans in accordance with Policy BE4 of the draft South East Plan.

Representation 6

Policy H5 of the draft South East Plan (reflecting Policy Q3 of RPG9) advocates making the best possible use of land and encourages sustainable patterns of development and services and higher housing densities, with an overall regional target of 40 dwellings per hectare. Policy CPI of the Core Strategy or the associated reasoned justification should include a commitment to contributing to the regional density target.

Representation 7

The Core Strategy should include a definition of affordable housing which clarifies that such housing should be subject to mechanisms that will ensure that the housing remains affordable to be consistent with the draft South East Plan definition.

Representation 8

In accordance with Policy H2 of the draft South East Plan, the Assembly seeks a commitment within the Core Strategy to the preparation of a Housing Delivery Action Plan (HDAP) to set out the overall strategy for ensuring that the housing allocation for the authority as set out in Policy H1 of the draft South East Plan can be met.

Representation 9

In accordance with Policy H7 of the draft South East Plan, the Assembly seeks a policy reference in the Core Strategy to measures to make better use of the existing housing stock to help meet housing needs and to promote urban renaissance and sustainable use of resources.

Representation 10

The Core Strategy should refer to the definition of infrastructure set out in Table I of the draft South East Plan Implementation Plan to ensure a consistent approach across the region for implementation and monitoring purposes.

Representation 11

Policy CP27 of the Core Strategy or the reasoned justification in support of the policy should refer to the need to support and develop the role of the regional spokes that relate to Tonbridge and Malling having regard to all modes of travel, to reflect Policy T5 of the RTS and Policy T3 of the draft South East Plan.

Representation 12

Policy S8 of the draft South East Plan encourages mixed use community facilities to make effective use of resources and reduce travel and other impacts. The Core Strategy could be strengthened with the inclusion of a reference to encouraging mixed use community facilities.