

**RSS EXAMINATION IN PUBLIC SOUTH EAST**

**STATEMENT BY CPRE KENT: PARTICIPANT 7150**

**MATTER 8Ci – THAMES GATEWAY: ECONOMY AND ENVIRONMENT**

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**8Ci.1 Are the interrelationships among the Thames Gateway towns and between them and the adjoining areas, particularly in terms of economic prospects and travel patterns, sufficiently recognised in the draft RSS (Policies KTG7, KTG11, KTG12, para2.5)?**

**Growth/transport link**

A key concern here is that substantial housebuilding or the allocation of large areas of employment land should not be undertaken without assurance that adequate transport infrastructure will be in place. We therefore welcome the statement that:

*'realising this capacity depends on all the necessary infrastructure being in place, plus vigorous promotion and implementation'*

(Paragraph 1.3)

This is consistent with the commitment set out in *Creating sustainable Communities: Delivering the Thames Gateway* (ODPM, March 2005), which states that:

*[The Government's] key principles are to... ensure that infrastructure and local services are in place when the community needs them'* (page 7)

and that:

*'Across the Gateway, growth and new development will be focused initially on areas with good existing or planned transport links.'* (Page 27)

The capacity referred to in Paragraph 1.3 is that established within the Interregional Planning Statement and the timescales and numbers differ from those of the draft RSS. Nevertheless, the basic principle is taken forward in the draft RSS through Policy KTG1:

*'Delay in infrastructure, services and employment may reduce the number of dwellings that can be achieved'*

We note the table listing the transport infrastructure schemes in the relevant annex of the latest version of the implementation plan. However, we believe that these transport projects should be explicitly linked to growth and regeneration in specific, named locations, both in respect of housing and employment land allocations. Policy KTG1 should then be linked to those tables, establishing the identified transport projects and employment growth as a pre-requisite for housing growth in the named locations.

Policy KTG12 appears also to support this basic concept, although it leaves the exercise to a later stage (the Sub-Regional Investment Framework). Policy KTG12 does not, however, state that growth in particular locations should be contingent upon specific transport infrastructure projects being put in place. Moreover, the Sub-Regional Investment Framework will not constitute policy that LDFs will be required to observe in the same way as the RSS.

### **Sittingbourne/Sheppey**

Paragraph 2.16(iii) appears to justify additional allocations of employment land largely on the grounds that it would reduce out-commuting. No assurance is offered, however, that the kind of employment which the draft RSS envisages should take place in Sittingbourne/Sheppey will be appropriate to provide a real alternative for those people who currently commute from the area. If that assurance cannot be provided, then a reduction in out-commuting cannot be cited as justification for additional employment land allocations. Furthermore, if the proposed strategy were successful, then, presumably, employment vacancies would be created as Sittingbourne/Sheppey residents move to more local jobs: there is no guarantee that those vacancies would not be filled by individuals commuting long distances from elsewhere.

### **8Ci.2 Are the economic development assumptions realistic in scale and location and is the employment land provision clearly related to that expected economic growth (Policies KTG4, KTG5, KTG6)?**

The economic development assumptions are clearly taking an optimistic view, which is perhaps understandable in an area designated for substantial growth. Policy KTG4, for example opens with the 'prediction' that:

*'The development of the economy in Kent Thames Gateway will be dynamic and widely-based'*

Paragraph 2.15 suggests that employment land provision should be '*generous*'.

The draft RSS does not make it clear what rate of job creation it is assuming, but it cites the Interregional Planning Statement as forecasting the creation of 58,000 from 2006-2026. This compares to the recent 20-year trend of 29,000 (Paragraph 2.13). If the RSS is working to the assumption that the Interregional Planning Statement as forecast is correct, then it is assuming a doubling of the rate of job creation. This seems highly ambitious.

While it is quite laudable for planning authorities to have high ambitions for economic growth, such ambitions frequently result in unrealistically high (i.e. excessive) allocations of employment land. The allocation of land is, of course, a principal activity of planning authorities and is perhaps unsurprising that planning authorities are often keen to use it to help encourage economic growth. It is not, however, sufficient in itself to realise that growth because land availability is not necessarily an important limiting factor. The result is frequently that more land is being allocated for economic development than is - or is ever likely to be - required. Excessive allocation can undermine sequential approach by unnecessarily diverting housing and other development to less favourable sites. This general problem was recognised in the January 2005 amendment to PPG3 - *Housing*. It can also make it difficult to steer economic

development towards sites which best serve the objective of urban regeneration when the total quantity of allocations require greenfield land to be allocated.

Growth in the Thames Gateway is by no means assured and, in any event, is clearly dependent on the provision of substantial new transport infrastructure, much of which has yet to be agreed and funded. Excessive allocation of employment land in LDFs is therefore a very real possibility. The solution is not necessarily to reduce the growth ambitions for the Thames Gateway. Rather, RSS should: attempt to keep employment land allocations broadly in line with realistic requirements. It should:

- give a broad indication of the quantities of employment land that should be made available in the locations that it identifies;
- state the magnitude of the growth rate assumptions that underlie those quantities; and
- make it clear that employment land allocations should be kept closely under review and that the sequential approach should be applied so as to avoid unnecessary allocation or release of greenfield land.

**8Ci.3 Is the emphasis on ‘higher value activity’ appropriate in Policy KTG4, bearing in mind that much recent pressure in Kent Thames Gateway has been for logistics and distribution activities?**

It is not necessarily the case that a policy in RSS emphasising the need for the expansion of ‘higher value activity’ precludes the expansion of logistics and distribution activities. The ‘emphasis’ in question could refer to the need to ensure that adequate provision is made in LDFs, whereas, in the case of logistics and distribution activities, sufficient land is already available in LDFs. It would be helpful if RSS explained what it means by ‘emphasising’ particular sectors, with particular reference to land allocation policy. An assessment of the adequacy of land available for logistics and distribution across the sub-region would be particularly helpful.

In any event, RSS should make it clear that it is not the intention to encourage an oversupply of land allocations for any particular sector and that the quantity of land allocated in development plans is not necessarily an important factor limiting growth.

**8Ci.4 Can the policy on Strategic Gaps in KTG11ii be justified?**

Yes. The Strategic Gaps are crucial in order to protect quality of life and to promote urban regeneration. CPRE Kent notes the emphasis within the South-East Plan on the expansion of urban and suburban living to the detriment of open countryside. This is epitomised by the fact that the Core Document - section D7 on Countryside and Landscape Management - occupies only five pages of a 349 page document and contains only four policies. CPRE Kent therefore sees it as very important that any protection of open countryside is strengthened. We take the view that harm to quality of life in rural Kent will lead to higher public spending on services and amenities and will drive away the better-off active retired who will take with them their spending power and volunteering capacity.

The definition of a Strategic Gap in the Kent context is given in the Glossary of the Kent and Medway Structure Plan (Deposit Plan 2003):

*“An area of predominantly open land between existing urban areas which serves to maintain their separate identity and prevent their coalescence with each other or with smaller nearby settlements”.*

The concept of Strategic Gaps and the importance of their maintenance has been retained in the Kent and Medway Structure Plan that was approved in 2006. Within Chapter 2 (The Spatial Strategy for Kent), Policy SS3 states that:

*“Strategic Gaps are designed to maintain the separation of:*

- *the Maidstone and Medway Gap urban areas from the Medway Towns and from each other;*
- *settlements on the east and west sides of the River Medway; and*
- *the Medway Towns and Sittingbourne urban areas including the separation of Iwade from Sittingbourne and from Ridham and Kemsley.*

*Within these gaps, any development proposals which would significantly extend settlements beyond existing built confines or the areas identified for development in the Plan or current local plan allocations, will not be permitted. Detailed boundaries of the Strategic Gaps will be identified or revised through Local Plan/Local development Documents.”*

In addition, despite the wishes of the Kent and Medway Structure Plan EiP Inspectorate, elected Members reinstated the following in Chapter 3 (Area Policies) Policy MA1 (Maidstone):

*“Provision of land for economic development at Maidstone should be re-appraised to ensure sufficient land and floorspace is available to comply with Policy EP2(c). This reappraisal should not: (1) undermine the principal role of the Strategic Gap in separating north Maidstone, a defined by the M20, from the Medway Towns urban area and the north-western edge of Maidstone from Aylesford/Ditton.”*

This acknowledges not only the requirement to retain open green land between the major urban areas of Maidstone and the Medway Towns, but also between urban Maidstone and smaller settlements along the River Medway.

The Maidstone Local Plan supports the concept of Strategic Gaps in Policy ENV31:

*“Development which significantly extends the defined urban areas or the built up extent of any settlement or development within the Strategic Gaps as defined on the proposals map will not be permitted.”*

**Regeneration of Maidstone** - CPRE supports the draft Plan’s objective of regenerating urban Maidstone. Policy CC8, for example, aspires to

*“The concentration of retail, leisure and service uses at the centre [of Maidstone].”*

and Paragraph 1.24 includes the statement that:

*“the spatial strategy promotes urban renaissance by making provision for development at the major urban areas of Maidstone-Medway Gaps.*

However, unless the sequential approach to site allocation and release is guaranteed to be strictly applied, the option of greenfield development is incompatible with urban renaissance since the greenfield option will remain the preferred first option for developers. CPRE is concerned, for example, that the much needed and vaunted redevelopment of Maidstone East railway station would be jeopardised if greenfield land just to the north and east of the Maidstone urban area is made available for development. It is therefore important to resist unnecessary greenfield development by holding the line of the M20 and maintaining the protection afforded by the Strategic Gap.

The threat of major greenfield development in the Maidstone area appears to be substantial. Paragraph 1.23 of Section D of the Draft South-East Plan Core Document states that:

*“The Maidstone LDF is exploring options for development in the form of urban extensions and/or a new community that would provide for up to an additional 1,000 dwellings above the level set out in Policy H1.”*

Both of these options imply the potential loss of greenfield land and are therefore likely to be a odds with the policies for countryside protection and urban regeneration. The Strategic Gaps will be crucial in order to help maintain the sequential approach to the use of development land.

We do not support the action of Maidstone Borough Council in offering to become a Growth Point accommodating an additional 500 dwellings per year, as opposed to the 400 dwellings per year adopted through Policy H1 of the Kent and Medway Structure Plan. This additional anticipated growth places greater pressure on the currently undeveloped land within the Maidstone area and therefore makes the protection of that land though the Strategic Gap policy all the more important.

In view of the foregoing, CPRE Kent welcomes the inclusion of the general concept of Strategic Gaps contained in Policy CC10b of the draft South-East Plan. We also see the policy as an essential element of the concept of ‘sustainable communities’. This view is strongly held in Kent. We particularly welcome the acknowledgement of the significance of Strategic Gaps in Policy KTG3 and Policy KTG11ii.