



GOVERNMENT OFFICE
FOR THE SOUTH EAST

Matter 8C Thames Gateway

Government Office for the South East of England (7447)

Draft RSS for The South East of England -The South East Plan
Examination in Public - November 2006 to March 2007
Written Statement on behalf of HM Government - December 2006

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)?

Relationships among the Kent Thames Gateway towns

1. The Plan provides little to indicate an understanding of the future roles and inter-relationship between the existing towns in Kent Thames Gateway (KTG), or how those relationships would be affected by major new developments. Policy KTG7 fails to identify where major development should be located and whether facilities, such as for higher education, should be distributed across the different centres or located centrally.
2. The Plan does not appear to look at the relative roles of the KTG towns in the context of the identity and character of the Gateway. Government is keen that the constituent parts of the Thames Gateway should reinforce a common identity. The Panel may wish to explore whether the draft RSS takes enough of an overview to ensure that the towns develop in a complementary fashion, rather than within smaller boundaries and potentially at odds with the overall direction of the Gateway. For example, has the Plan given due consideration to the roles that joint working, sharing of best practice and joint projects should play in achieving successful growth?

Relationship between Kent Thames Gateway towns and adjoining areas

3. There appears to be little appreciation of KTG's relationship with the South Essex and East London parts of the Gateway. The three Regional Development Agencies are currently drawing up an economic strategy for the Thames Gateway that needs to be reflected in the Plan; this strategy reflects the South East England Development Agency's (SEEDA) recently published Regional Economic Strategy (RES).
4. Policy KTG11 refers to policies for local areas outside of the Gateway boundary not being linked to the Gateway. The Panel may wish to consider whether this is realistic or desirable as these areas (Swanley, Medway Gap & Maidstone)

will benefit from and use facilities, employment and services within the North Kent Gateway area. For example, people will commute into the Gateway area for employment purposes. It would be useful for the Panel to further explore this inter-relationship, especially in view of the recent government support for Maidstone as a new growth point. If this is solely a reference to these surrounding areas not being required to make up for any shortfall in KTG growth, this needs to be clarified.

Maidstone Growth Point

5. The role of Maidstone as a New Growth Point is explored in GOSE statement 9B.2. We support the new role for Maidstone and encourage the Panel to reconsider Maidstone's role in regard to the Thames Gateway. One aspect of this relationship is whether the Plan has taken sufficient account of the access requirements between the two, or the desirability of a reduced reliance on car travel on routes through the M2 junctions.

Transport

6. A key issue for the Plan is whether the transport network within the Thames Gateway and between the Gateway and surrounding areas has sufficient coverage and capacity to accommodate the growth generated movements. If not, what mix of reduce, manage and invest is appropriate to fit with the anticipated transport capacity limitations, and/or what changes to the distribution and scale of growth are needed to achieve an optimal relationship between transport investment and other factors.
7. If the KTG is to be an attractor for the surrounding areas the Plan should assess whether the transport links between the KTG and adjoining areas are strong enough. It should also consider the capacity of the KTG transport networks themselves to accommodate extra movements created as a result of growth in those areas. The Panel may wish to examine whether the impact of growth on the KTG transport network should be considered as a factor in setting growth levels for the surrounding areas.
8. Expanding on para 2, above, the Panel may wish to examine whether the Plan gives due consideration to the development of a hierarchy to ensure that the KTG towns develop in a complementary manner. In transport terms, the Panel may wish to be assured that the progressive polycentric development of these towns is associated with a rebalancing of the transport system to facilitate reliable access: and without generating traffic levels which cannot reasonably be accommodated. An explicit policy prioritising public transport between those centres of activity, in line with the policy for spokes between hubs, may be appropriate.

Thames Crossing Capacity

9. The Department for Transport announced in October 2006 that it is commissioning a study to look at the options for addressing long term issues of traffic crossing the Thames, including the possibility of a new crossing. Work

has started on specifying the scope of the study, with a view to letting the study as early as possible in 2007. Although any crossing over the Thames would primarily form a strategic route, it would have implications for the local economies, support growth and address concerns about congestion. In this respect, announcements made by Government in October 2006 are fully supportive of the draft plan.

10. Announcements made by Government in October 2006 make the second part of policy KTG12, which calls for an urgent Lower Thames Crossing Study, redundant. This is particularly the case if the Panel agree with our view that it is inappropriate for a Regional Spatial Strategy to specify in policy form the terms of reference and option scenarios for a proposed study. The policy as drafted risks linking the study to the South East Plan timescale and so frustrating the urgency aim of the policy.

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)?

1. The economic assumptions appear to be realistic. In order to achieve this economic growth people will need to be attracted to the areas proposed for development. In this regard we invite the Panel to examine whether the draft Plan recognises the extent to which housing and social infrastructure will need to attract the type of people required to fulfill the employment opportunities created.
2. The Thames Gateway Strategic Partnership / Communities and Local Government package of documents on the Thames Gateway (launched on 22 November at the Thames Gateway Forum) explain the sectors that have potential for job growth and where these jobs are expected to be located. For example the largest concentration of immediate new jobs in the wider gateway will be in financial and business services located at Canary Wharf and nearby. Further growth is anticipated over the next twenty years in Stratford City and Ebbsfleet Valley.
3. The Thames Gateway Development Prospectus (published by CLG in November 2006) indicates where development is likely to take place, opportunities for private sector development and investment and what those investments are intended to achieve in order to deliver sustainable growth. This should be recognised by the Plan.
4. As illustrated within the Thames Gateway Interim Plan, the Kent Thames Gateway is currently underperforming economically. We would invite the Panel to consider whether the Plan should go further in stating what 'softer' interventions are needed to reverse that pattern, beyond the provision of sites and transport infrastructure. For example, at present there is no clear mechanism to ensure that employers will move to the area. This is an issue on which we would be keen to hear the views of SEEDA.

5. The issues raised here with regard to the alignment of jobs and housing has been raised under previous matters. These issues are of particular relevance to KTG, considering the levels of development and investment required to be sustained over the Plan period. The dangers of this alignment not taking place are clear; for example, new housing not being near to appropriate employment opportunities could lead to dormitory towns and excessive commuting that run contrary to the aims of the Sustainable Communities Plan.

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?

1. Whilst recent pressures may have been for logistics and distribution services, over time, it is expected that higher value activities will become more widespread within the North Kent area. This is not to say that the area should not play to its current strengths, but it should not be blind to the wider economic picture and should plan for how it will build on its assets to respond to the emerging knowledge economy. Long term reliance on lower value jobs is unlikely to be possible given the trend to higher value jobs and therefore the emphasis on higher value activity would appear to be a more sustainable approach if the KTG is to successfully secure significant growth.
2. However, the Plan also needs to be clear about how it will ensure that the appropriate level of “higher value activity” is attracted to the right parts of the KTG. The Thames Gateway Interim Plan expands upon this, as does SEEDA’s Regional Economic Strategy.
3. The Panel might wish to explore whether the Plan sufficiently recognises and addresses the inter-dependence of all of the relevant factors involved in achieving the higher value activity it expects to take place. For example, the factors behind raising the aspirations and skills of the local population and how that links to education, attracting the right employers. The Plan appears to suggest that the development of key sites and provision of supporting physical infrastructure will make the attraction of such industry a foregone conclusion. The views in the Eddington Report which discredit the “build it and they will come” approach are relevant here.
4. The Panel may wish to explore whether or not the Plan has seriously considered the possible effects of competition between the KTG Towns on securing high level investment, and whether these should be legislated for in the Plan. The potential effects of failing to plan for these towns to develop in a complementary fashion could be counter productive to the overall economic ambitions of the sub-region.
5. In terms of the skills base required, an element of the new housing may need to be deliberately targeted at those already working in “higher value activity”. This would help to reduce significant in-commuting from more prosperous nearby areas such as Maidstone and Sevenoaks (or the jobs not being delivered).

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

1. The majority of development within the North Kent area will take place on brownfield land, thereby limiting the need to develop Greenfield sites. Broadly speaking, while the Sustainable Communities Plan and Thames Gateway Interim Plan advocate the advantages of open green spaces, sufficient protection for these already exists.
2. As discussed under matter 2b, we do not favour such local designations in RSS as a means of preventing settlement coalescence. There is no national policy basis for such a designation and creating a further blanket restriction on development is out of step with the positive aims of the new planning system.
3. Even if the principle of Strategic Gaps is supported by the Panel, we note that the Kent Downs AONB runs between the Medway towns and the Medway Gap urban area/ Maidstone. Overlaying a further designation with slightly different boundaries could overcomplicate the situation without offering any positive result. We question whether the gap between Maidstone and the Medway Gap urban area is of sufficient strategic importance to be included in a Regional Plan. We consider that the need for separation between these urban areas is something which could be addressed locally when broad locations for development are chosen through the LDF process.

8Cii.1 Is the overall housing provision at the right level having regard to the status of the sub-region as part of a Growth Area, as well as local constraints, opportunities and building rates (KTG1)?

1. There appears to be little if any recognition of Government's intentions for growth in the North Kent Gateway nor of proposals for work to support and accelerate housing delivery in the Thames Gateway Interim Plan and the Development Prospectus produced in partnership with Government and delivery partners that details our visions for delivery to 2016.

Housing Delivery

2. The Plan's policy to deliver 48,000 homes is welcome but we believe that these could be delivered before 2026. Using data that the DCLG has collected, we calculate that for the period 2001-2006 the Gateway region of North Kent has delivered some 9,000 dwellings. When the Plan's policy to complete a further 24,100 dwellings is added to this we are given a total of appx. 33,000 dwellings for the period 2001-16, some 10,000 short of the previously stated total of 43,000 for the region – agreed by the Regional Assembly as part of the Inter Regional Planning Statement. The IRPS figure represented a rate of 2,867 pa. Policy KGT1 allocates a rate of only 2,410 pa. Over the remaining 10 years of the Plan the target actually drops slightly to 23,900. So at no stage of the Plan period does the rate of growth match potential highlighted by the Inter-Regional Statement.

Building Rates

3. DCLG, DfT and the Highways Agency are currently working with the Local Authorities on essential infrastructure, particularly transport. Building rates are also now increasing, especially in Kent Thames-side. Accordingly, we invite the Panel to consider whether it is reasonable to plan for only 5,000 more homes in the growth area by 2026 than was considered possible by the Inter-Regional statement by 2016.
4. We note the reasons given for a slower build rate but do not believe that they fully reflect Government's intentions for the area. Reference has been made to growth at each location being supported by phased and co-ordinated provision of infrastructure, employment, environmental improvement and community services but the timescale of these supporting measures is not clear. We view housing as being an integral part of the economic regeneration of the Thames Gateway.
5. Since the publication of the Inter-Regional Planning Statement there has been increased investment and infrastructure provision from Government and a greater focus on the area. We would expect this to assist in the delivery of housing for the sub-region.

Transport

6. The Panel should consider whether the;
 - Development Prospectus,
 - RDA pan-Gateway economic statement,
 - Regional Funding Allocation transport interventions programme, and
 - sub-regional investment framework list of unprioritised schemes are sufficiently aligned.
7. There are two other aspects to the relationship between housing and transport that we would wish to see the Panel explore. Firstly, does the Plan provide for the necessary travel behaviour change, mode shift and infrastructure to make the proposed levels of housing viable? Secondly, is the link between housing and jobs sufficiently recognised? There is a danger that if this link is not made, a significant imbalance would be created, leading to dormitory towns and excessive commuting.

8Cii.2 Is the statement in para 2.2 that delivery of the housing capacity figures is not practical by 2016 justified by the evidence? What are the implications of this shortfall compared to the capacity data?

8. The Plan's reduction in housing numbers against the IRPS does not appear to be well founded, especially given that the IRPS also commented that the delivery of housing numbers would be reliant upon the necessary infrastructure being in place.
9. The Plan does not acknowledge that Government contributions and interventions have been greatly increased in the region. Nor does the Plan take into account the publication of the Thames Gateway Interim Plan and Government and delivery partners' commitment to continued increased investment and interventions.
10. Furthermore, the Thames Gateway Interim Plan makes an explicit proposal to establish a task group to advise the Thames Gateway Strategic Partnership how best to accelerate housing completions within the Gateway. This needs to be considered and taken into account within the draft Plan.

8Cii.3 How will the split between social and intermediate housing (mentioned in Policy H4) be handled in the sub-region?

11. Once the outcome of CSR 07 is known, the Thames Gateway Interim Plan commits DCLG, in collaboration with delivery partners, to completing a Gateway wide affordable housing plan with clear targets that accord with aspirations to create mixed communities.
12. We note the difference between the Plans recommended indicative affordable housing levels for KTG (30%) and the wider South East (35%). However, present needs suggest there may be a greater need for affordable housing in KTG than other parts of the region. In particular, it is important that if economic growth does not take place as predicted it will be important that the right

housing is supplied. We would be grateful for the Panel to consider whether the Assembly has correctly balanced these factors, and if the target figure is questionable, whether the LDF process has sufficient freedom correct this.

8Cii.4 Is the distribution and phasing of housing development within the sub-region (for example Medway/Swale before Dartford) appropriate and consistent with the Inter-regional Planning Statement (Policy KTG1)?

13. The levels of distribution set out within South East Plan are relatively consistent with the Inter-Regional Planning statement. See below.

Housing distribution	Inter –reg. statement	S E Plan
Kent Thameside	47%	52%
Medway	34%	32%
Swale	19%	16%

14. The distribution of housing across the IRPS, the development prospectus and the Plan are not comparable. Please see the table below.

	IRPS (01-16)	SE Plan (2006-16)	Dev Prosp (01-16)
Dartford	20,000	8,300	9,900
Gravesham		2,900	5,824
Medway	15,000	7,500	11,677
Swale	8,000	5,400	6,462
TOTAL	43,000	24,100	33,863
		34,048 *	

* figure including Completions to date (01-06) 9,948 (taken from Dev Prospectus)

15. As can be seen from the above table the numbers given in the SE Plan are some 9,000 short of the original IRPS totals.
16. Further, the information contained within the Development Prospectus illustrates the amount of investment so far.

8Cii.5 Is the approach to brownfield land in Policies KTG3i and KTG7v justified by the evidence?

17. We welcome the principles behind KTG3, which broadly reflect the objectives for brownfield land set out in Planning Policy Statement 3 (PPS3).
18. However, the Panel may wish to consider the following questions:
- i) is the approach to previously developed land in KTG5 and KTG7 consistent with the overarching approach to PDL proposed in the draft RSS?
 - ii) how consistent is the approach set out in both policies with the proposed approach to PDL set out in PPS3? In particular:

- what is meant in KTG3i by 'uses new land in a manner which improves the form, functioning and environment of existing settlements'? How might LPAs be expected to interpret this approach at the local level?
 - how does the approach to developing PDL in KTG7 v) relate to the proposed approach to developing PDL in PPS3 ?
19. Government targets 60% of new developments to be on previously developed land, although within the Thames Gateway area developments have thus far exceeded this and taking place on approximately 80% brownfield land.

8Ciii.1 Have the water supply and waste water treatment, and transport implications of the growth proposals been adequately considered (paras 2.25-27)?

1. As already discussed under matter 1E.4, the Environment Agency has carried out helpful studies which have identified where, there are existing capacity, investment, technological or other factors.

Waste Water Treatment

2. There is no evidence provided for the statement made and no suggested action. It would be helpful for the plan to demonstrate that proper assessments have been made with the relevant water companies and that information is being shared between this planning process and that which produces the Water Resource Plans.

Transport

3. Transport investment strategies in Kent Thames Gateway are intended to be aligned with housing growth aspirations. The east – west road and rail routes have received direct additional funding or via rail franchise improvements. Widening of the A2 provides additional road capacity linking with the developments in Eastern Quarry and Ebbsfleet. Further work will be required to examine the performance of the junctions along the route.
2. The introduction of CTRL domestic services to Ebbsfleet in 2009 will form the centre piece of a transport hub with Fastrack services enabling greater accessibility around Kent Thames Gateway.
3. Government is proposing the safeguarding of land for future expansion of Crossrail. This is consistent with supporting homes and jobs for Kent. Recognition of this is absent from the plan.
4. As referred to under 8ci.1, Government has embarked upon a study, which will consider the need for further crossings of the Thames.
5. It should be made clearer in the Plan that Crossrail would safeguard land between Abbey Wood and Ebbsfleet, not Hoo, for any future Crossrail extension. The Implementation Plan scheme for four tracking between Abbey Wood and Hoo only makes sense in the context of an extension of Crossrail.

8Ciii.2 Is the sub-regional development policy sufficiently robust to respond to the outcome of the strategic flood risk assessments as required by Policy KTG9?

6. Flood risk assessments have already been carried out across the Gateway. Reference is made in para 2.22 to TE2100 taking 6 yrs to complete, but this needs checking. High level options resulting from TE2100 will be available for public consultation in Spring 2007. Once the results of the TE2100 modelling are known the results may need to be looked at jointly by the three Regional

Planning bodies to look at the effects on a pan-Gateway level and to plan for the future on that basis. Interventions on a regional basis only could be counter-productive for neighbouring regions flood management plans.

7. PPS25 will subject planning applications for flood risk areas to more thorough scrutiny, enabling appropriate, sustainable development to continue. This provides an adequate framework for local planning authorities on minimising flood risk to new development.

8Ciii.3 Are the proposals in the Implementation Plan¹ (including for social and green infrastructure) clear, justified and well related to the spatial strategy (KTG12)? What are the priorities and is the organisational structure adequate?

8. The long-term planning for infrastructure within this Growth region is welcomed. Government agrees that developing a view on the appropriate infrastructure should be driven by local understanding and local interests but needs to take account of national priorities and programme constraints, and be affordable and deliverable. The status of the Implementation Plan was the subject of a note (GOSE 4) considered by the Panel on 12 December. In order to be effective an understanding of the relative priority of interventions is desirable, with particular emphasis on how that intervention enables continued and successful growth in the sub-region. The Implementation Plan does little to provide that understanding.
9. Emphasis has been explicitly placed by the Assembly on the need for infrastructure. However, we would invite the Panel to explore whether the Plan gives sufficient consideration to the role that demand management in areas like transport and water should play in this sub-region. For example, to what extent demand management might reduce the need for new infrastructure over the Plan period.
10. Whilst we understand the emphasis given to further crossing capacity of the Thames, we believe that the Plan would benefit from highlighting the use of sustainable transport methods as key infrastructure, and the role of transport authorities in strongly promoting this through their local transport plans.
11. KTG12 should also highlight the use of green infrastructure and its multi-functionality (e.g. environment, health, market appeal, education, flood protection, place-making, etc.), as is consistent with Greening the Gateway policy and the emerging policy provisions set out in the Thames Gateway Interim Plan.
12. Within the range of interests identified, we believe that Local Regeneration Partnerships set up by DCLG with key public, private and voluntary representation, have a supportive role in many of the policy areas identified – this should be reflected in the Plan. We would suggest referencing in policies KTG 1, 3, 4, 6, 8, 10 and 12.

¹ To be updated by SEERA prior to EiP

13. A Development Prospectus has been published, in collaboration with delivery partners, that details the nature and scale of development planned, including investment in key transport infrastructure, what is in hand and what remains to be done. The Prospectus document details what is planned for each area and also what they feel can be delivered. The RDAs have also published a pan-Gateway economic statement that reflects their views of the projects that need to be completed in order to benefit the Gateway as a whole. The work that has gone into creating these documents needs to be recognised as the stakeholders and delivery partners have been fully involved in their drafting.

Transport

14. The Highways Agency may make specific comments on strategic road schemes. The following detailed comments relate to rail interventions currently referred to in the Implementation Plan and are generally intended to describe outcomes rather than specific schemes:
 - i) We expect that future phases of Fastrack should facilitate delivering approximately 25,000 houses, rather than the 23,000 reflected in the sub-regional investment framework.
 - ii) North Kent Line capacity. This outcome/ impact should state "increase peak capacity on North Kent Line services (longer trains/ platform lengthening)" rather than the current reference to 4 tracking.
 - iii) We suggest the safeguarding of land for 4 tracking of Abbey Wood-Hoo Junction then on to Ebbsfleet be put under a separate scheme called Crossrail Ebbsfleet extension.
 - iii) For the other rail schemes, the delivery agent should be listed as Network Rail only, not NR/DfT.

Crime

15. The panel may wish to consider whether the impacts of crime and disorder have been taken into account. Crime reduction is not solely the responsibility of the police. Section 17 of the Crime & Disorder Act places a duty on Local Authorities and others to do all they can to reasonably prevent crime and disorder in their area. In this context, LA's have a key statutory role to carry out their core activities in such a way that significantly contributes to reducing crime and improving the quality of life in their area. This impacts upon Local Authority planning services and should be taken into account at that level. However, the Panel may wish to consider whether the draft Plan takes this aspect of development sufficiently into account, in terms of design and supporting infrastructure.